

Savannah River Site CITIZENS ADVISORY BOARD

PO Box A

Building 730-B, Room 3396

Aiken, SC 20802

A Department of Energy Site-Specific Advisory Board

November 19, 2008

Mr. Jeffrey M. Allison, Manager
U.S. Department of Energy
Savannah River Operations Office
Aiken, S.C. 29808

Dear Mr. Allison:

On behalf of the Board, I am pleased to forward to you the following recommendation adopted during the November 17-18, 2008, Savannah River Site (SRS) Citizens Advisory Board (CAB) meeting.

Recommendation 259 – General Accounting Office (GAO) Report Regarding Processing Additional Nuclear Materials at the SRS H-Canyon

We anticipate your written response prior to the January 26, 2009, Board meeting. Thank you for your timely consideration of the enclosed recommendation.

Sincerely,



Donna Antonucci, Chairperson
SRS Citizens Advisory Board

Enclosure:
SRS CAB Recommendation #259

cc w/enclosure:
Melissa Nielson, EM-13, DOE-HQ
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Recommendation #259

General Accounting Office (GAO) Report Regarding Processing Additional Nuclear
Materials at the SRS H-Canyon

Background

H-Canyon began operations at the Savannah River Site (SRS) in 1955 and processed nuclear materials for nuclear weapons and nuclear energy. Previously, the Department of Energy (DOE) planned to shut down H-Canyon/HB-Line in 2007. However in August 2006, the DOE Deputy Secretary approved extending H-Canyon/HB-Line operations until 2019.

In conjunction with extending operations, the Subcommittee on Energy and Water Development Committee on Appropriations requested the GAO to perform a review (Ref. 1) to include:

1. Types of material to be processed in H-Canyon/HB-Line and associated costs,
2. Waste generation and whether SRS facilities can process and disposition this waste, and
3. Compliance with safety and environmental requirements.

The review was conducted from October 2007 thru July 2008 and the methodology utilized included:

1. Review of DOE's nuclear materials disposition plans, and
2. Review of DOE's project management guidance on how to estimate costs, determine milestones, and monitor performance.

The following actions occurred: interviews were conducted with Environmental Management (EM) personnel, National Nuclear Safety Administration (NNSA) personnel, Inspector General (IG) personnel, and independent reviews. Reviews were conducted on Waste Management and Risk Management plans, DOE Business Plans, integrated project management documents that outline the approach to meet H-Canyon/HB-Line processing and waste management goals, and DNFSB reports. In addition, tours of the H-Canyon/HB-Line and Waste Management facilities were conducted by the GAO.

Conclusions:

1. H-Canyon can be operated safely through 2019 to disposition Al-clad SNF, HEU, and plutonium,
2. SRS has not, nor will not, process any materials without adequate safety basis,
3. SRS has made progress on upgrading H-Canyon/HB-Line safety documentation,
4. EM has updated the cost estimate for dispositioning nuclear materials through H-Canyon/HB-Line to include cost for waste storage and disposition, and
5. H-Canyon has completed initiatives to minimize waste generation.

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The GAO's review identified no safety concerns with operating H-Canyon/HB-Line through 2019, provided DOE invests in planned infrastructure upgrades. DOE's plan for processing these materials has several benefits:

1. The amount of SNF to be disposed in the geological repository will be decreased,
2. Down-blending of Highly Enriched Uranium (HEU) to Low Enriched Uranium (LEU), which is not weapons usable, can be used in commercial reactors, and
3. The sale of LEU can provide revenue to the Department of Treasury.

However, the GAO recommended a need to ensure all material requiring H-Canyon/HB-Line processing be identified. In response, DOE stated that the Nuclear Materials Disposition and Consolidation Coordinating Committee (NMDCCC) forum provides cross-cutting nuclear materials disposition and consolidation planning (Ref 2). Close coordination within DOE and utilizing DOE Order 413.3 will ensure that future decisions regarding additional materials beyond the EU Disposition project to H-Canyon/HB-Line will be coordinated to minimize impact to H-Canyon/HB-Line disposition schedule.

Comment

The SRS Citizens Advisory Board (CAB) supports the consolidation and processing of nuclear materials in the H-Canyon/HB-Line (Ref 3), as well as the transition to the replacement group for NMDCCC when NNSA takes over the administration of nuclear materials consolidation.

Recommendation

The SRS CAB has not changed its stance on the importance and continued operation of H-Canyon and considers H-Canyon a national resource. The SRS CAB recommends that:

1. DOE continue to aggressively pursue measures to keep the H-Area assets (people and equipment) fully engaged in stabilizing and dispositioning all DOE legacy nuclear materials provided the current consolidated schedule for SRS clean-up is not jeopardized. To that effect, DOE should propose an updated agency-wide call for any additional nuclear materials requiring processing and inform the new DOE nuclear materials coordination team since they may impact H-Canyon schedule, plans for closure, and additional waste streams.
2. DOE provide updates on the replacement group for NMDCCC to ensure continued timely and accurate information/presentations on activities and missions for H-Canyon to the SRS CAB.
3. By July 27, 2009, DOE inform the CAB of progress in updating the safety documentation for H-Canyon operations.

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References

1. General Accounting Office (GAO) Report on reduction of risks prior to processing additional nuclear material at the Savannah River Site H-Canyon, presentation by Allen Gunter, DOE-SR; September 9, 2008.
2. Citizens Advisory Board Recommendation No. 232 (adopted May 24, 2006), "NMDCCC Committee"
3. Citizens Advisory Board Recommendation No. 235 (adopted July 25, 2006), "Nuclear Materials Disposition Consolidation & Coordination Committee."