

Recommendation 321

Improving Public Communication and Understanding of the Liquid Waste Program and Revisions to the “Liquid Waste System Plan”

Background

For many years the Savannah River Site Citizens Advisory Board’s Work Plan has included an annual update on the revisions to the “Liquid Waste System Plan.” This “Liquid Waste System Plan” is a very important document as it details the activities that must be sequenced to treat and disposition the High Level Waste currently in the underground storage tanks and to close the tanks. While the “Liquid Waste System Plan” is revised annually, it describes the planning basis for processing the liquid waste in the underground storage tanks through the end of the program mission. The development of the “Liquid Waste System Plan” is a joint effort between the Department of Energy, Savannah River, and the company that has the contract for the liquid waste program, which currently is Savannah River Remediation.

To fulfill the Work Plan, the Department of Energy or a contractor for the liquid waste program has given a presentation on the revisions to the “Liquid Waste System Plan” to the Waste Management Committee or to the full Board at one of the bi-monthly meetings. The most recent presentation was given on July 24, 2014, to the full Board by a representative from Savannah River Remediation. The liquid waste program is very complicated and involves many steps with many processes and utilizes many facilities. In addition, the liquid waste program is subject to several laws and regulations as well as an enforceable agreement. As a result, it is difficult for members of the Board and the public to comprehend the significance of the revisions in the “Liquid Waste System Plan” given during a single presentation and to have time to formulate thoughtful questions or comments at the conclusion of the presentation.

This is unfortunate given the importance of the liquid waste program to the safety of workers at the Savannah River Site and the citizens of South Carolina. The High Level Waste in the underground storage tanks has repeatedly been described by the Department of Energy and the South Carolina Department of Health and Environmental Control as the greatest environmental risk in South Carolina. The latest revision, number 19, to the “Liquid Waste System Plan” shows that enforceable milestones will be missed, which will result in delays in the treatment of the High Level Waste and closure of the underground storage tanks. Not only will the risk to the public from the High Level Waste continue for many years to come, the tax payers may have to foot the bill for millions of dollars of fines if enforceable deadlines are not met.

Comments

Over the years the presentations about the annual revision to the “Liquid Waste System Plan” given by the Department of Energy or its contractors have not consistently shown the same figures, tables, schematics or bullet lists to communicate the Liquid Waste Program and the “Liquid Waste System Plan” or its revisions. In addition, the presentations have included numerous acronyms. When such a complicated presentation is given without previous discussions or copies in advance, the public is not well served.

All experts that give presentations to the Savannah River Site Citizens Advisory Board should keep in mind that, by design, the Citizens Advisory Board is not a technical Board; as a result, there are many members who do not have scientific or technical backgrounds. That does not mean, however, that complicated processes/issues have to be avoided; instead, the presenters need to be able to explain complicated processes in layman's terms. For example, one does not have to be a chemist or be given chemical formulas to understand what the outcome and importance of the "Actinide Removal Process/Modular Caustic Side Solvent Extraction Unit" (often abbreviated as ARP/MCU) is to the treatment of high level liquid waste.

A better process needs to be initiated to inform the Board and the public at large about the Liquid Waste Program and the Liquid Waste System Plan (and its revisions), the progress that is projected for the future, and the consequences of missed milestones.

This recommendation is intended to build upon "Recommendation #269-Semi-Annual Review of the Inputs and Assumptions Used to Develop the Liquid Waste System Plan" (http://cab.srs.gov/library/recommendations/recommendation_269.pdf) that was adopted by the Board on May 25, 2010, and accepted by the Department of Energy on July 19, 2010.

Recommendations:

The Savannah River Site Citizens Advisory Board recommends that the Department of Energy:

1. Work with the Waste Management Committee to develop a template for the annual presentation that describes the revisions to the Liquid Waste System Plan; specifically, at a minimum, the template should specify what diagrams, figures, tables, or schematics should be used every year and must be free of acronyms.
2. Adhere to the template described above when the annual revision to the Liquid Waste System Plan is presented to the Board thereafter.
3. Hold an information session every year with the Waste Management Committee prior to the finalization of the revision to the "Liquid Waste System Plan" to highlight the changes and to answer questions that arise; this session must be done prior to any scheduled presentation to the Board on the revisions to the "Liquid Waste System Plan."
4. Provide an estimate of how much of an increase in the budget for the Liquid Waste Program would be needed to meet milestones when budget shortages are responsible for delays in meeting enforceable milestones.
5. Provide a printed copy of the Executive Summary of the annual revision to the "Liquid Waste System Plan" to the Waste Management Committee at least one week prior to any scheduled presentation on such revisions.
6. Provide a printed copy of the annual revision to the "Liquid Waste System Plan" to the Chair of the Waste Management Committee as soon as it is finalized.

7. Include links to copies of the current and past “Liquid Waste System Plan” revisions on the www.srs.gov homepage under the “Publications and Documents” dropdown tab.
8. Work with the Waste Management Committee to come up with a schedule to develop the template described above.
9. Work with the Waste Management Committee to develop a mutually agreeable timeline for the information session described above, distribution of the Executive Summary to the final revision of the “Liquid Waste System Plan” and the annual update on the revision to the “Liquid Waste System Plan.”
10. Include a presentation that describes the Liquid Waste Program and the role of the Liquid Waste Program Plan at the Citizens Advisory Board’s Annual Education/Process Meeting.
11. Include the liquid waste system facilities as a routine part of the Site tours provided for members of the Citizens Advisory Board.