



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

MAR 18 2015

Mr. Harold Simon, Chairperson
Savannah River Site Citizens Advisory Board
P.O. Box A
Aiken, SC 29802

Dear Mr. Simon:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 326 – Double-Stacking Defense Waste Processing Facility (DWPF) (Your letter, dated 01/28/2015)

Thank you for your recommendation on the continuation of research on double-stacking to ensure that double-stacked canisters are as safe to the community and environment as traditionally stored canisters. The Department of Energy, Savannah River Operations Office (DOE-SR) partially accepts your recommendation and provides the following responses to the recommendation:

1. Work with Savannah River Remediation and its contractors to request and justify necessary funding to ensure safe treatment and storage of waste while moving forward with maximum effort to close the aging tanks no later than the agreed upon schedule in the Federal Facility Agreement and other legally binding documents.

We accept this subpart. During the budget formulation process, DOE-SR identifies and submits funding requests in the Integrated Priority List needed to meet all Minimum Safe and Regulatory Compliance scope requirements.

2. Continue to research double-stacking to ensure that double-stacked canisters are as safe to the community and environment as traditionally stored canisters, and protect workers from radiation exposure per applicable DOE regulations.

We partially accept this subpart. The Department does not plan to conduct any research regarding double-stacking. However, as required by US Code of Federal Regulation 10 CFR 830 Nuclear Safety Management, DOE and its contractors must establish the safety basis of its nuclear facilities. The nuclear safety requirements in 10 CFR 830 are implemented under DOE Order 420.1.C Facility Safety. DOE and its contractors are currently performing all the steps required by the DOE Order to validate that double-stacking of canisters in Glass Waste Storage Building 1 (GWSB-1) will not exceed the radiological and chemicals limits that are required to protect the safety of the workers, the public, and the environment. Security plan evaluation remains the same. The following supporting activities are on-going which the Department will review to ensure the safety of the workers, the public and the environment:

- Structural qualification of the canisters for double stacking configuration
- Structural qualification of the GWSB-1 foundation for double stacking configuration

MAR 18 2015

- Technical Feasibility Report for double-stacking configuration
- Operational Exposure Dose Rate Evaluation
- End State Exposure Dose Rate Evaluation
- Heat Transfer Analysis
- Safety Basis Strategy
- Fire Hazards Analysis
- Safety Basis Documents

3. If research results indicate that double-stacked containers do not pose a threat to the public and environment utilize this temporary storage method while a federal repository is sought.

We accept this subpart. Once all of the analytical evaluations outlined in item two are completed with positive results, it is the Department's plan to pursue double-stacking of DWPF canisters in GWSB-1.

Furthermore, preliminary analyses results for double-stacking of canisters concluded that the dose will not exceed the evaluation guideline limits. Therefore, double stacking will not pose any additional risk to the worker, the public, or the environment.

As always, DOE welcomes input from the public as we continue to work on cleanup and waste disposition activities at the Savannah River Site. If you have questions, you can contact me or contact Carl Lanigan, of my staff, at (803) 208-6483.

Sincerely,



David C. Moody
Manager

WDPD-15-34

cc: Kristen Ellis, EM-3.2, DOE-HQ
David Borak, EM-3.2, DOE-HQ
Terry Spears, Deputy Manager, DOE-SR
Michael Mikolanis, DDFO, DOE-SR
Sandra Waisley, DDFO, DOE-SR
Marshall Taylor, SCDHEC
Gwen Keyes, EPA
Sean Hayes, GADNR