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099 Panel: Challenges in DOE HLW Tank Management: Making Progress Under Differing Stakeholder and Regulatory Environments

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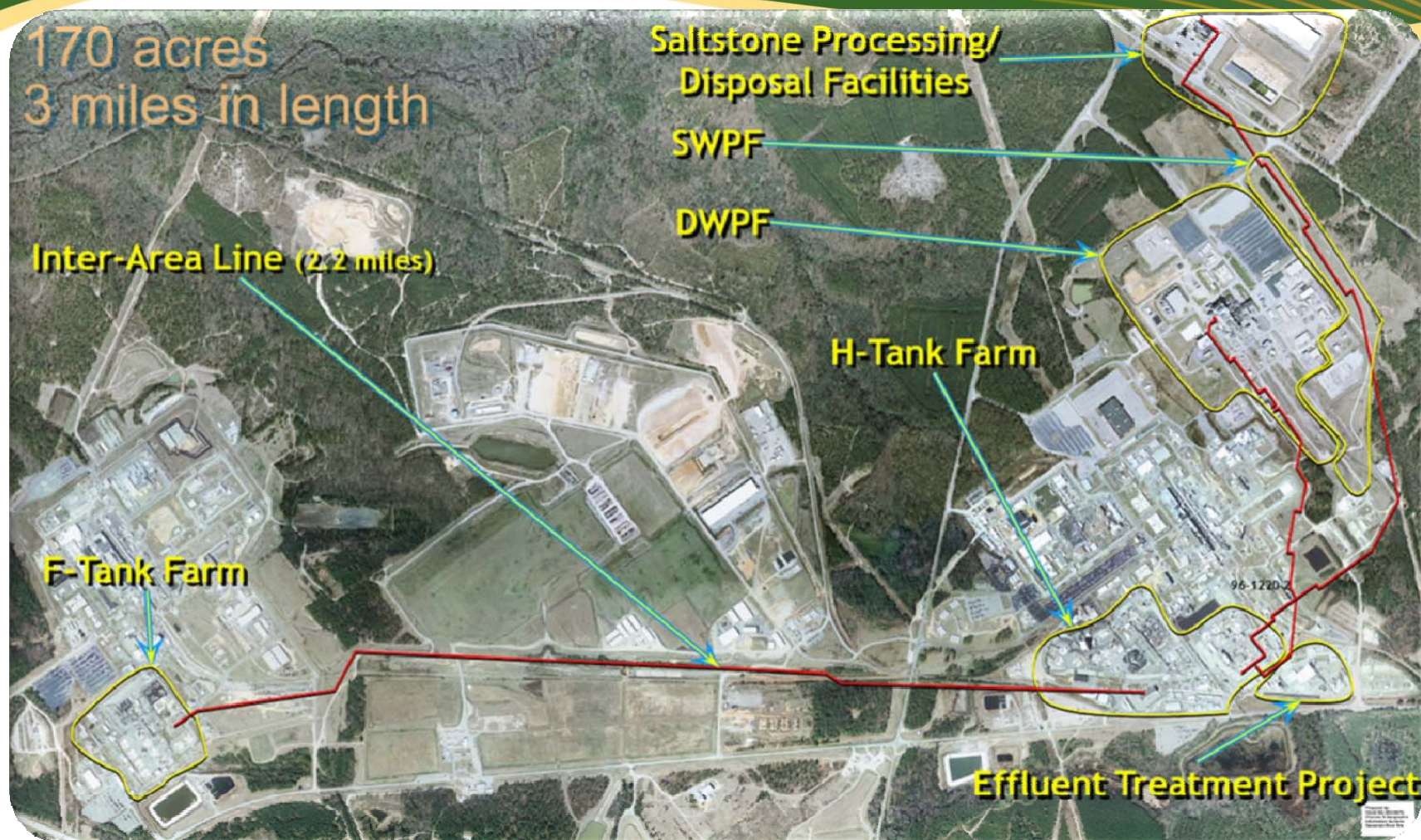
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Liquid Waste Operations Overview



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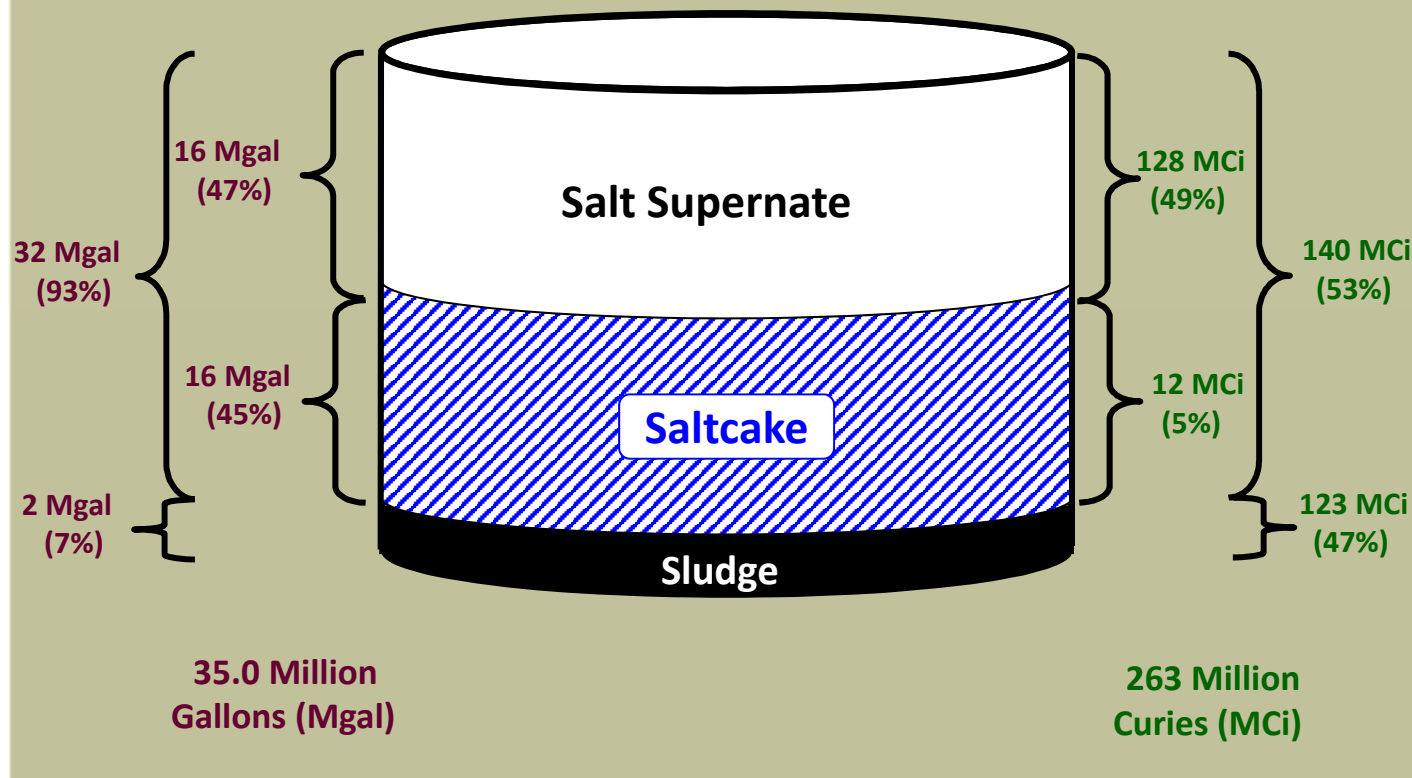
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SRS Composite Inventory

Volume

Curies



Inventory values as of 2016 – 12-30

Salt Supernate

Saltcake

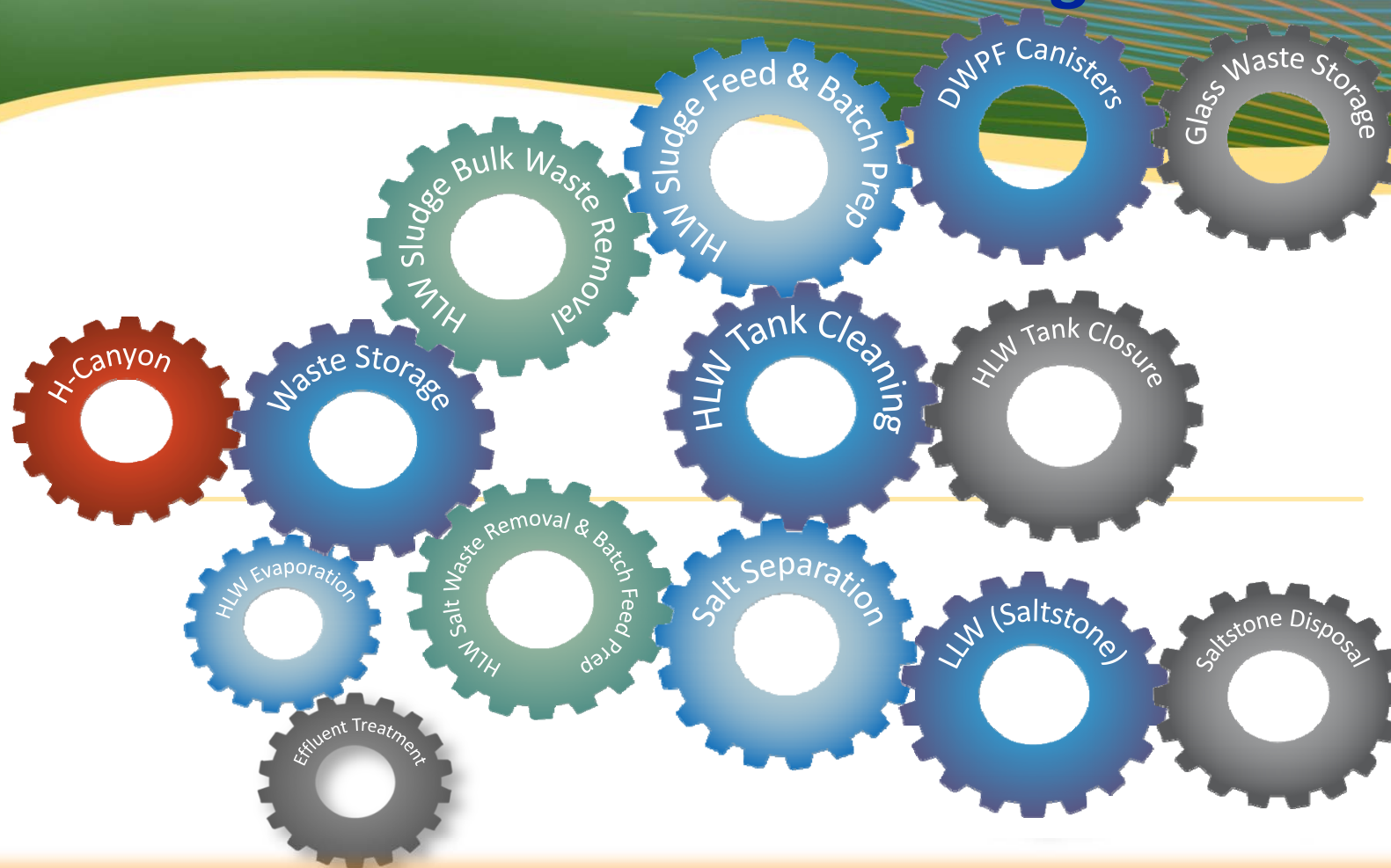
Sludge



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Liquid Waste Program Integration



Safe storage, treatment, and disposition of SRS liquid waste requires synchronization of several highly interdependent nuclear facilities and chemical operations

Communications with Stakeholders and Regulators

1. Positive Steps to Good Communications

- a. Recognize who your stakeholders are:
 - i. Stakeholders – Citizens Advisory Board (CAB), Defense Nuclear Facilities Safety Board (DNFSB), Nuclear Regulatory Commission, public , special interest groups
 - ii. Regulators - South Carolina Department of Health and Environmental Control (SCDHEC) and Environmental Protection Agency (EPA)
- b. What are their focus areas and areas of regulatory oversight – permits, commitments, Site Treatment Plan, Monitoring, etc.
- c. Understand what the stakeholders/regulators know or more importantly don't know
- d. Recognize and Identify the Challenges – Funding uncertainties, Aging Facilities and Workforce, Gaps, Interconnection of facilities
- e. Share all background with the stakeholders and regulators

2. Things we do/have done to establish good rapport:

- a. Establishing common goals and understandings – focus on the outcomes, end product
- b. Impromptu phone calls on status of facilities
- c. Tours, training, walk downs of facilities – Liquid Waste System Overview & System Plan –
- d. Periodic Status updates:
 - i. Bi-Monthly CAB
 - ii. Quarterly Reviews w/SCDHEC & EPA
 - iii. Monthly DNFSB
 - iv. Bi-weekly w/ HQ SRS Liaison
 - v. DOE/EPA/SCDHEC Workshops – yearly
 - vi. Working Level Integration Team – as needed (monthly)

Communications Approach

3. Formal Communication Plans – for any major events like the demise of the high-level waste treatment facility melter 2- planned notifications
 - a. Plans should recognize each of the stakeholders/regulators and ensure all are given the same information
 - b. Hierarchy of notifications
4. What is the approach? when things aren't going according to plan and the potential for missing commitments is realized:
 - a. Have an agreed to process for Dispute Resolution –
 - b. SRS – Federal Facilities Agreement (FFA) Dispute Process–
 - i. Informal - FFA Manager, 1st level supervisors, Subject Matter Experts – any party may elevate to next higher level (No legal, resolve technical issues)- may be as many meetings as necessary
 - ii. Formal Dispute Resolution Committee (DRC) – mid management, may elevate to next higher next – issues remain technical primarily, but legal ramifications may be introduced; i.e., formal agreements, resolution of penalties, Consent Decree – this lasts until resolution or one party requests to elevate to next level but must be done in 28 days unless the parties agree to extensions; ex: Dispute Resolution Agreement - a year
 - iii. Senior Executive Committee – senior organization's management – need to resolve if possible as it's an agreement between all 3 parties, if not then EPA makes the final ruling – 30 days to come to an agreement.

Communications Approach (Cont'd)

- c. **Try to resolve at the lowest level.** Start all discussions as low in the management chain as possible – starting with the working level and 1st level supervisor . Focus on the technical issues that are the basis for missing the commitment. Try to resolve the technical issues first
- d. In the informal stage - have as many meetings as necessary so that everyone understands the issues and basis for the missed milestone/commitment. DOE should have recommended resolution(s) – **Be the LEADER of the resolution.**

Lessons Learned

1. Communications

- a. We are not adversaries
- b. It is not "winner take all" but rather give and take
- c. All parties are heard - nobody is shut out or off, all parties communicate openly, there is no hidden agendas or omissions.
- d. All parties/representatives are cordial throughout the various levels

2. The work goes on and the issue is not carried over to other areas of interest to the stakeholders (e.g., LW dispute has no impact on Area Closure Projects)

3. Success requires all parties not only resolve the issue but accomplish progress – what end state are you trying to reach – how do we get there (Tank 15 & 10 example)

4. Successful resolutions have occurred at informal and formal levels because:

- a. Early and frequent engagement beforehand (our quarterly meetings, document development, etc.) leave little room for surprises
- b. Transparency is expected and the norm, it is neither withheld or earned
- c. All parties are proud of the site accomplishments
- d. Without transparency, frequent updates, etc - the negotiations would undoubtedly be longer, more difficult, and challenging