

PART III – SECTION J, ATTACHMENT U

OPERATING DISPOSAL AUTHORIZATION STATEMENT FOR THE
REMOTE-HANDLED LOW-LEVEL WASTE DISPOSAL FACILITY
IDAHO NATIONAL ENVIRONMENTAL LABORATORY, IDAHO

Effective May 22, 2018 -

Operating Disposal Authorization Statement
for the
Remote-Handled Low-Level Waste Disposal Facility
Idaho National Environmental Laboratory, Idaho

Revision No. 0

Effective Date: May 22, 2018

Disposal Authorization Statement

In fulfillment of the requirements of the Department of Energy's (DOE) Order 435.1, *Radioactive Waste Management*, this 2018 operating disposal authorization statement (ODAS), which serves as the DOE Federal authorization for the design, construction, operation, monitoring, and closure of a low-level waste disposal facility, is hereby issued to the Idaho Operations Office for the Remote-Handled Low-Level Waste (RHLLW) Disposal Facility. The issuance of this ODAS allows the Idaho Operations Office to commence the disposal of low-level radioactive waste at the RHLLW facility. Operation of the facility under the ODAS requirements shall ensure reasonable expectations that the facility does not pose a threat to human health and the environment.

DOE must conduct its low-level radioactive waste disposal program in accordance with the requirements contained in the following documents and any subsequently approved revisions. The following documents are components of the DOE approved Radioactive Waste Management Basis (RWMB) for the RHLLW Disposal Facility:

- Performance Assessment (PA) DOE/ID-11421, R0
- Composite Analysis (CA) DOE/ID-11422, R0 and CA Addendum, DOE/ID-11577, R0
- Performance Assessment Closure Plan (CP) PLN-3370 R0 and Addendum, PLN-5503. R0
- Performance Assessment Monitoring Plan (MonP), PLN-5501, R0
- Performance Assessment Maintenance Plan (MP), PLN-3368, R0
- Change Control Process (CCP) Procedures: SD-52.1.4, R0 and IFM Number:01, R0
- Waste Acceptance Criteria (WAC), PLN-5446, R0

The operation of the facility is subject to all applicable rules and orders now or hereafter in effect and to the conditions specified below. Also, this authorization is applicable to any subsequent revisions and additions to the PA, CA, and other technical basis documents provided the revisions and additions are in accordance with the *Disposal Authorization Statement and Tank Closure Documentation* Technical Standard (STD-5002-2017, May 2017). Applicable permits and reports that comprise the RWMB shall be approved and continue to be maintained current according to the applicable DOE Directives.

Facility Construction and Design

The design features of disposal units in the RHLLW disposal facility shall conform to the conceptual model used in the PA. Significant changes in the disposal technology, disposal unit, or waste form shall be evaluated in accordance with the *Disposal Authorization Statement and Tank Closure Documentation* Technical Standard (STD-5002-2017, May 2017) and the change control procedures identified in the Disposal Authorization Statement section. If required, changes shall be submitted to the LFRG for review/approval.

Radionuclide Limits, Waste Form, and Packaging

Disposal within the RHLLW facility shall be in accordance with the WAC which provide specific radionuclide disposal limits, waste form restrictions, and descriptions of acceptable waste packages. The WAC shall be based on the facility PA and any Special Analyses (SA) developed in accordance with *Disposal Authorization Statement and Tank Closure Documentation* Technical Standard (STD-5002-2017, May 2017) and the change control procedures identified in the Disposal Authorization Statement section. If an SA is required and results in more restrictive limits than those derived under the original PA analyses, the WAC shall be changed to incorporate the more restrictive limits. Waste acceptance procedures shall be in place describing requirements for waste characterization, waste certification, and record keeping as well as the process for authorizing deviations from the requirements. All wastes received for disposal at this facility must conform to the waste acceptance procedures or have an authorized deviation.

Closure

If necessary, CP for the RHLLW must be revised to accommodate any deviations from the closure concept analyzed in the PA or SA.

PA/CA Monitoring

If necessary, PA/CA monitoring plans shall be updated to accommodate any deviations from the conceptual model analyzed in the PA/CA. PA/CA monitoring plans shall be evaluated annually as part of the PA maintenance program and updated, if required, to reflect any changes in facility conditions. PA/CA monitoring plans shall include monitoring frequencies and protocols for all the data collection required to assess the continued performance of the disposal facility. The plans shall also require monitoring results be compared to forecasted system behavior, and for the development of any corrective actions if deemed necessary.

PA and CA Maintenance

Changes in the disposal facility operations (e.g., waste form, waste stream, disposal unit design, monitoring, radionuclide quantity, etc.) or onsite policy (e.g., land use plan) or future strategies (e.g. receipt of offsite waste) constitute changes in disposal facility controls and shall be managed according to the *Disposal Authorization Statement and Tank Closure Documentation* Technical Standard (STD-5002-2017, May 2017) and the change control procedures identified above in the

Disposal Authorization Statement section. Changes and discoveries that have the potential of exceeding a Performance Objective/Measure must be submitted to the LFRG for review and approval (if required). DOE shall utilize a change control process to evaluate conditions (proposed changes and discoveries) that cannot be readily determined to comply with the PA requirements. If after analysis, the facility exceeds the Performance Objectives, operations will be suspended and the LFRG will be informed immediately. Exceeding any of the Performance Objectives is considered a violation of the DAS.

DOE shall perform an annual review of the adequacy of the following documents and provide the results of this review to the LFRG for review:

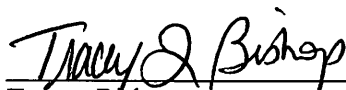
1. Disposal Authorization Statement
2. Performance Assessment
3. Composite Analysis
4. Closure Plan
5. Monitoring Plan
6. Maintenance Plan
7. Waste Acceptance Criteria
8. Change Control Process Procedure

CONDITIONS

No additional conditions

Violation of Operational Requirements

Operational procedures shall be developed and maintained that support the list of documents identified in the "Disposal Authorization Statement" section of this document and implemented to ensure the disposal facility is operated in a manner that protects the worker, the public, and the environment. These procedures shall be identified in the RHLLW facility's Radioactive Waste Management Basis. Violation of these procedures will be handled in accordance with the appropriate site corrective action programs (Non-Conformance Report, Problem Identification Report, Root Cause Analysis, etc.). As appropriate, the LFRG site representative is responsible for evaluating violations to operating procedures and informing the LFRG as necessary if there is a potential of violating the DAS. A violation of the DAS has occurred if the Performance Objectives identified in DOE Manual 435.1-1 have been exceeded.



Tracey Bishop
Deputy Assistant Secretary
For Nuclear Infrastructure Programs



Date