



01-0001902

The Secretary of Energy
Washington, DC 20585

September 14, 2001

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW
Washington, D.C. 20004-2901

Dear Mr. Chairman:

Enclosed is the Department's revised Implementation Plan concerning the Defense Nuclear Facilities Safety Board's Recommendation 2001-1, High-Level Waste Management at the Savannah River Site.

The enclosed revised Implementation Plan is the product of numerous meetings between members of your staff and representatives of the Department of Energy. As a result, we believe the Implementation Plan addresses, with one exception, the expectations expressed in your May 24, 2001, letter.

The interactions between members of your staff and representatives of the Department have been helpful in providing an opportunity to discuss and agree on the content of the revised Implementation Plan. Because the Department currently lacks the necessary information to fully address your sub-recommendation 2 relating to salt processing, the Department will update this revised Implementation Plan in April 2002, to address the Department's salt processing strategy when the necessary information is available on which to base commitments and schedules. The Department will continue to work with the Board and your staff to provide progress reports for the commitments contained in the revised Implementation Plan.

Mr. Paul Golan, Chief of Staff, Office of Environmental Management, is the responsible manager for the Department's Implementation Plan to this Recommendation. Mr. Golan can be reached at (202) 586-7710. Mr. Greg Rudy, Manager, Savannah River Operations Office, will be the point-of-contact for the site-specific actions for this Recommendation. Mr. Rudy can be reached at (803) 725-2405.

Sincerely,

Spencer Abraham

Enclosure

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DOE's PLAN OF ACTION TO RE-ASSESS
SAVANNAH RIVER SITE'S HIGH LEVEL WASTE
MANAGEMENT STRATEGY

DNFSB RECOMMENDATION 2001-1
IMPLEMENTATION PLAN
REVISION 1

September 5, 2001

Executive Summary

On March 23, 2001, the Defense Nuclear Facilities Safety Board (Board) issued Recommendation 2001-1, *High-Level Waste Management at the Savannah River Site*. The recommendation addresses the need for the Department to ensure that the margin of safety and amount of tank space in the Savannah River Site High Level Waste (HLW) system is sufficiently maintained to enable timely stabilization of nuclear materials at SRS.

The Department accepts this recommendation and finds that the Board's recommendation appropriately highlights the need to vigorously address the significant management challenges that the Savannah River Site High Level Waste (HLW) program faces in accomplishing the strategic mission of waste stabilization in light of the failure of the In-Tank Precipitation process, recent tank leaks, and other equipment problems in the HLW system. These events have forced major changes in the overall HLW system plans and additional actions are warranted to identify ways to regain operational flexibility, increase system margins to deal with potential future system upsets, and proceed with an alternative salt disposition process. The Department agrees with the Board that addressing these issues will ensure continued safe storage of wastes, as well as continued stabilization of both high level waste and nuclear materials at SRS.

This plan outlines the actions the Department and its contractors will take to ensure continued safe storage of HLW while maintaining operational flexibility and progress in the stabilization of material currently held in HLW storage tanks. Actions include pumping down liquid levels to below the lowest leak sites in two tanks, implementing an alternative salt disposition process, re-evaluating waste treatment and storage options, and conducting an independent assessment of the contractor incentives. The Department has been aggressively pursuing resolution of the issues highlighted in Recommendation 2001-1 and many of these actions are already complete or are presently ongoing.

The plan identifies the responsible manager and provides a due date for completion for each commitment. The responsible manager will ensure the activity is satisfactorily completed, including seeking necessary funding, and formally closed. Mr. Paul Golan, Chief of Staff, Office of Environmental Management, is the overall Responsible Manager and Mr. Greg Rudy, Manager, Savannah River Operations Office, is the point of contact for site specific activities.

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1. Background:

On March 23, 2001, the Defense Nuclear Facilities Safety Board (Board) issued Recommendation 2001-1, *High-Level Waste Management at the Savannah River Site*. The recommendation addresses the need for the Department to ensure that the margin of safety and amount of tank space in the Savannah River Site High Level Waste (HLW) system is sufficiently maintained to enable timely stabilization of nuclear materials at SRS. The Department accepted the recommendation as addressed in the implementation plan provided to the Board on May 18, 2001. On May 24, 2001, the Board responded in a letter in which it found the original implementation plan was not responsive to all elements of the recommendation and provided a suggested course of action for consideration by the Department during the formulation of a revised implementation plan. The Department has evaluated the concerns described in the Board's May 24, 2001, letter and this revision to the original plan incorporates and addresses the Board's expected actions.

2. Underlying Causes

The underlying causes of the problems highlighted in Recommendation 2001-1 are the failure of the In-Tank Precipitation process, recent tank leaks, and other equipment problems within the HLW system. These events have forced major changes in the overall HLW system plans and added a level of complexity to the already challenging mission objectives. The actions identified in this Plan are intended to provide increased short-and long-term operational flexibility to meet mission objectives and deal with future system upsets that may occur.

3. Summary of Completed and Near-Term Actions

See specific subrecommendations under Section 4

4. Recommendation Issue Resolution

The Board's subrecommendations and the specific actions the Department intends to take to address each subrecommendation are discussed below.

Subrecommendation 1. Initiate actions to remove transferable HLW liquid from Tank 6 to a level below all known leak sites.

Background: After a January 2001 transfer of low activity waste water into an older style (Type I) tank (Tank 6) that had been essentially empty since 1973, alarms were received in the control room indicating liquid in the annulus area (collection space between the tank wall and the concrete vault that encases the tank). Visual inspections confirmed liquid in the annulus and sampling identified the material as radioactive waste (versus rainwater intrusion). Detailed inspections using a remote crawler and video camera identified 6 leak sites.

Resolution: The Department accepts this subrecommendation. The Department recognizes that situations compromising the integrity of the primary containment are undesirable. An initial transfer of 40,000 gallons of liquid from Tank 6 into Tank 8 was completed on March 27, 2001. The direction to lower Tank 6 further was given to the site contractor on May 1, 2001 and the contractor completed lowering the level in Tank 6 to below the lowest known leak site on May 30, 2001.

Subsequent to Recommendation 2001-1 issuance, leak sites were also identified in another old style tank (Tank 5) after the addition of low activity waste water. The inspection program identified the leak sites before any alarms were received and the waste level was lowered below the lowest known leak site on July 30, 2001, by pumping the material to Tank 8. Tank 8 is also an old style tank that received low activity waste water in the past year. Because of the leaks in Tanks 5 and 6, the Department initiated an inspection of Tank 8 using the remote crawler with a video camera. This inspection shows no indication of tank leakage. However, given the nature of the leak sites in Tank 5, no additional transfers into Type I storage tanks are planned except for those special and infrequent additions required for waste removal activities.

SRS has had a Waste Tank Structural Integrity Program for many years. The Waste Tank Structural Integrity Program includes an In-Service Tank Inspection Program that has been based primarily on remote camera visual inspections. One limitation with the visual inspection program has been the percentage of the tank walls that could be inspected due to physical access restrictions. Based on the new crawler inspection capabilities developed as part of the response to the tank leaks and the new ultrasonic inspection program recently implemented, SRS intends to revise and re-issue the Waste Tank In-Service Inspection Program to include these new tools and the lessons learned from the two recent tank leak investigations. The In-Service Inspection Program will include enhanced visual and ultrasonic inspections of both single walled and double walled waste tanks. The acceptance criteria outlined in the program are based on guidance from the DOE Tank Structural Integrity Panel published in 1997 and referenced in DOE Order 435.1, *Radioactive Waste Management*. The primary changes are in the area of the new ultrasonic inspection program. The changes will identify the tanks to be inspected and the bases for selection, identifying the magnitude of the inspections (e.g. percentage of horizontal/vertical welds inspected, percentage of overall tank types to be inspected and by what technique), and establishing of the frequency of the inspections (e.g. Tank X every Y years after initial inspection).

The Department implementation milestones for subrecommendation 1 are:

Commitment 1.1 Pump Tank 6 to below the lowest known leak site.
Lead Responsibility: Manager, Savannah River Operations Office
Deliverable: Waste physically lowered in Tank 6 to below the lowest leak site
Due Date: May 31, 2001
Status: Complete May 30, 2001

Commitment 1.2 Pump Tank 5 to below the lowest known leak site.
Lead Responsibility: Manager, Savannah River Operations Office
Deliverable: Waste physically lowered in Tank 5 to below the lowest leak site
Due Date: July 30, 2001
Status: Complete July 30, 2001

Commitment 1.3 Revise HLW tank inspection program
Lead Responsibility: Manager, Savannah River Operations Office
Deliverable: Revised Inspection Program Plan (document)
Due Date: April 2002

Subrecommendation 2. Reassess the schedule and priority for selecting a technology for a salt processing capability, and vigorously accelerate the schedule leading to operation of a salt processing facility.

Background: At the point of Defense Waste Processing Facility (DWPF) startup, the HLW system plan consisted of two waste pretreatment processes – sludge preparation via the extended sludge processing (ESP) and salt preparation via In-Tank Precipitation (ITP). Due to initial startup issues with the ITP process (see Board Recommendation 96-1), DWPF began radioactive operations processing sludge only. In 1998, due to concerns the ITP process could not be cost-effectively implemented to meet safety and production objectives, the contractor recommended and the Department agreed to suspend ITP startup to perform an extensive evaluation of alternative processing options.

Resolution: The Department accepts this subrecommendation. The selection of a salt processing technology is a critical priority of the Department. The Department began work evaluating alternatives to the ITP process in 1998, and since March 2000 the Department has been working toward selecting a technology in accordance with the Action Plan defining the Savannah River Site Salt Processing Project Roles and Responsibilities. Under this Plan, a joint Headquarters/Savannah River Site Technical Working Group (TWG) was established to lead the effort for technology selection. Key activities included the development of selection criteria and the conduct of extensive research and development testing to address high technical risks for each of the technologies under consideration. The Environmental Management HLW Tank Focus Area supported the TWG by providing technical direction and management of this R&D effort. The Salt Processing Alternatives Supplemental Environmental Impact Statement (SEIS) was issued in July 2001 and presents the Department's preferred technology selection along with the basis for the selection. The Department currently plans to have the Record of Decision for this SEIS issued by October 2001. Once the technology decision is finalized, a Request for Proposal (RFP) will be issued by November 2001 for program implementation. The proposed acquisition strategy is to seek up to two Engineering, Procurement, and Construction (EPC) contractors to perform conceptual design of a facility capable of future production utilization. One EPC will then be selected to perform final design and construction of the facility. Selection of the two contractors is expected in early 2002.

Ongoing evaluations of potential salt processing strategies and the current maturity of concepts do not readily facilitate the identification of specific project actions the Department will complete by specific dates beyond those already discussed. Because the Department cannot provide milestones and dates based on reliable information at this time, the Department proposes to provide additional details and commitment dates relative to this subrecommendation in April 2002, rather than provide commitments and dates that have a high likelihood of changing in the near future. The April 2002 date allows ongoing studies to be completed or near completion (including system planning impacts) and selection of an EPC based on an approved acquisition strategy.

The current HLW System Plan (Revision 12) shows that an FY 2010 date for startup of a salt processing facility can be supported. However, the Department will conduct a sensitivity evaluation surrounding this date. This sensitivity evaluation will be documented in a separate

report to be issued in April 2002 and will be based on assumptions utilized in Revision 13 of the HLW System Plan, which is expected to be issued in May 2002. Revision 13 is expected to identify the potential benefits derived from an early facility start-up as well as the impact of other initiatives such as alternate methods for low-source-term salt disposition. The study will also look at the impacts of delayed salt disposition activities. The results of this study will be factored into the new commitments for the HLW Salt Project.

The Department implementation milestones for subrecommendation 2 are:

- | | |
|----------------------|--|
| Commitment 2.1: | Identify a Preferred Technology |
| Lead Responsibility: | Chief of Staff, Office of Environmental Management |
| Deliverable: | Draft SEIS published with preferred technology identified |
| Due Date: | June 2001 |
| Status: | Complete |
| Commitment 2.2: | Issue Record of Decision on Salt Processing Alternatives |
| Lead Responsibility: | Chief of Staff, Office of Environmental Management |
| Deliverable: | SEIS ROD published |
| Due Date: | October 2001 |
| Commitment 2.3: | Brief the Board on the preferred salt processing technology and schedule |
| Lead Responsibility: | Chief of Staff, Office of Environmental Management |
| Deliverable: | Briefing |
| Due Date: | June 2001 |
| Status: | Complete |
| Commitment 2.4: | Issue Request for Proposals for up to two Engineering, Procurement, and Construction contractor(s) |
| Lead Responsibility: | Manager, Savannah River Operations Office |
| Deliverable: | Publish RFP |
| Due Date: | November 2001 |
| Commitment 2.5: | Issue report on HLW Tank Farm schedule sensitivity analysis |
| Lead Responsibility: | Manager, Savannah River Operations Office |
| Deliverable: | Report |
| Due Date: | April 2002 |
| Commitment 2.6: | Develop and submit commitments related to implementation of the revised salt processing program |
| Lead Responsibility: | Chief of Staff, Office of Environmental Management |
| Deliverable: | Revised 2001-1 Implementation Plan |
| Due Date: | April 2002 |

Subrecommendation 3. Develop and implement an integrated plan for HLW tank space management that emphasizes continued safe operation of the Tank Farms throughout its life cycle. This plan should include enough margin to accommodate contingencies and reduce overall programmatic risk. The plan should also restore operating margin to the Tank Farms by including action to: [see sections a - e below]

Background: The Tank Farm space management strategy is based on a set of key assumptions involving canister production rates, influent stream volumes, Tank Farm evaporator performance, and space gain initiative implementation. Tank space management is a subset of the overall integrated HLW System Plan and as such is a life-cycle look at the space available to accommodate contingencies and support site missions. The HLW System Plan is updated annually and considers the latest data available as well as the current conditions, challenges and potential impacts to Tank Farm operations.

Due to the decision to suspend salt processing operations at ITP, recent process and equipment problems with the site evaporators, and recent leaks in two older style tanks, space limitation in the HLW tank farms has created an operational challenge that, if not properly managed, could adversely impact the ability of the site to meet mission objectives.

Resolution: The Department accepts this subrecommendation. Revision 12 to the HLW System Plan issued in May 2001, and provides enhanced coverage of areas not previously highlighted, including management of Type I, II, and Type IV tanks. The Department recognizes that aggressive action is required to address HLW system challenges, and the results and conclusions of ongoing and planned studies addressing the following components will be incorporated into the next revision of the HLW System Plan.

a. reduce or eliminate the DWPF recycle stream

DWPF is the largest single contributor of waste to the tank farms. Several actions have already been taken to reduce the more than 2 million gallons of DWPF recycle waste sent to the Tank Farms annually. A major reduction effort was implemented in January 2000 to isolate the steam atomized scrubber system from the melter off-gas system. This resulted in an annual 700,000-gallon reduction in recycle being sent to the Tank Farm. Implementation of proposals associated with the frit transfer system and reductions in sample line flushes also resulted in additional water generation reductions. It is anticipated that the annual recycle being sent to the Tank Farm will be reduced from approximately 2,200,000 gallons for a 250 can-per-year production rate to approximately 1,400,000 gallons or less. Additional DWPF recycle reduction proposals (such as the installation of a DWPF acid evaporator and the feasibility of sending some recycle directly to the Saltstone or effluent treatment facility) will be evaluated. A decision relative to the need for an acid side evaporator will be made in FY02 based on technical feasibility reviews, evaporator recovery efforts, resolution of silica issues, and demonstrated evaporator performance.

b. recover former ITP tanks for Tank Farm operations

A schedule has been implemented to return Tank 49 (previously an ITP salt processing tank) to waste concentrate storage service. A briefing for the Board on August 2, 2000 provided the Department's plans relative to Tank 49. Tank 49 contained approximately 200,000 gallons of benzene-bearing solution from ITP demonstration runs that had to be removed prior to its return to waste storage service. The decomposition of benzene-producing phenylborate compounds was performed in two phases. The first phase was completed in March 2001 when the material in Tank 49 was heated to 40 degrees Celsius. The second phase involved the introduction of copper catalyst to Tank 49. The first copper addition occurred in March 2001 and subsequent additions were completed by July 2001. The material in Tank 49 will be transferred to Tank 50 by the end of FY2001. Modifications required to tie Tank 49 into the H-Tank Farm transfer system have already been completed. Tank 49 is expected to be available for service by October 2001.

Tank 50, currently being used as a receipt tank for Effluent Treatment Facility (ETF) bottoms, will be available for use in March 2003. The associated construction/project work has been initiated to support this effort. A Baseline Change Package authorizing the start of this work was approved April 23, 2001.

Additionally, Tank 48, which contains approximately 250,000 gallons of precipitate from the original startup of the ITP process, will be evaluated for possible return to the HLW system. This evaluation will focus on the technical options for dispositioning the material, discuss the confidence level of success based on technical and regulatory risks and identify any research and development work that must be accomplished. Lessons learned from returning Tank 49 to service will be incorporated into the future Tank 48 plans.

c. assess the desirability of adding an additional HLW evaporator to support Tank Farm operations

The Space Management review identified in commitment 3.1 will re-assess a new evaporator option as a longer-term enhancement to the HLW program. In general, the current issues impacting tank space management are not associated with evaporator capacity, but are process and equipment related problems, which would also impact a new evaporator that utilizes existing tank farm support systems. These existing system problems are specifically addressed in paragraph (e) below.

The three evaporator systems currently available have sufficient capacity to handle the expected demands of the HLW system once the process and equipment issues associated with the 2H and 3H Evaporator systems are overcome. Revision 12 of the system plan shows that to meet the current plan the 2H evaporator must achieve 40percent availability, 3H must achieve 40 percent, and 2F must achieve 35 percent after ongoing issues are resolved. These studies also show that the three evaporator systems operating

at expected capacity will provide margin to accommodate future system upsets and allow the option to shut down the 2F Evaporator system at some point in the future. As an example of expected operations, 2H had 60 percent availability for the 1997 through 1999 period and 2F evaporator has achieved 57 percent availability in FY01. If the expected operational performance is achieved, the 2F Evaporator system could potentially be used to facilitate increased operational flexibility (salt disposition) or early waste removal from old style tanks instead.

d. assess the feasibility of constructing new HLW tanks

The Space Management review identified in commitment 3.1 will re-assess the option of new storage tanks, including smaller tanks as part of or separate from the Tank Farms.

e. resolve waste compatibility and equipment degradation problems to allow unconstrained operation of the three existing evaporators

Improvements made to the 2F Evaporator system during FY 2000 have made that system more reliable, and current performance is better than expected. This system is operational and a new vessel is currently on hand should it be necessary to replace the existing vessel. The current planning case does include a vessel replacement in the utilization projections.

The 2H Evaporator experienced erratic lift rates and was shut down in January 2000 when attempts to correct the lift rate were unsuccessful. Sample results from solids previously found in the evaporator pot revealed that the material consisted of sodium aluminosilicate and sodium diuranate. Initial analysis indicated that these solids form in the presence of high silica and high aluminum feed. The Savannah River Technology Center (SRTC) continues to analyze methods of preventing the sodium aluminosilicate formation in the evaporator pot. Analytical work and testing verification is expected to continue through FY2002. Work is also underway to develop a 2H Evaporator flowsheet, based on SRTC experimentation, which will support continuous 2H operation after restart. This flowsheet will incorporate the results of SRTC experimentation with respect to potential means to prevent or mitigate sodium aluminosilicate formation. It will reflect the design and operating constraints of the HLW evaporator system, along with any needed process and equipment changes, in order to eliminate the need to periodically inspect and clean potential solids buildup. The flowsheet will be extended to the 3H and 2F Evaporator Systems. Until this work is completed, appropriate controls have been put in place to limit the amount of silica content in the feed to the 3H and 2F Evaporators. Operations are essentially complete to clean the 2H Evaporator and remove the solids. The 2H Evaporator activities are now focused on restart efforts and the system is expected back in operation in Fall 2001.

The 3H Evaporator system is operating in a limited mode due to cooling coil problems in Tank 30 (the 3H Evaporator drop tank). A project to convert Tank 37 to drop tank service, by installing a drop line from the evaporator to the tank, has been initiated and the Baseline Change Proposal (BCP) authorizing funding was approved on April 23, 2001. In addition to hardware modifications, some degree of salt removal from Tank 37

will be required for efficient system operations. The schedule to have the 3H system functioning at full capacity is late 2002.

Revision 12 of the HLW System Plan accounts for these difficulties and shows that, even with the low utilization rates discussed in section 3.c, the overall HLW system can meet mission objectives. These low utilization rates are intended to demonstrate some continuing level of flexibility to deal with unforeseen upsets, and expected utilization rates provide even greater flexibility in dealing with future problems.

A comprehensive re-assessment of Tank Farm Space management options is underway to identify specific options that can be taken to restore operational flexibility with respect to available storage capacity. A second study, a system vulnerabilities assessment, is also currently in progress to identify system vulnerabilities that can significantly impact the HLW System Plan and the HLW mission objectives. This study will then evaluate potential mitigative strategies/actions that could be pursued. These studies will be comprehensive in nature and cover a wide range of options. Revision 13 of the HLW System Plan will incorporate the results of these studies and identify the options that will be pursued further (i.e. either a decision has already been made to implement and/or will be evaluated further with a specific decision date defined).

The Department implementation milestones for this subrecommendation are:

Commitment 3.1: Assess Tank Farm Space Management options and system vulnerabilities.

Lead Responsibility: Manager, Savannah River Operations Office

Deliverable: (1) Tank Farm Space Management Options Assessment Report, and (2) System Vulnerability Assessment Report

Due Date: January 2002

Commitment 3.2: Issue revised HLW System Plan incorporating actions from Commitment 3.1

Lead Responsibility: Manager, Savannah River Operations Office

Deliverable: HLW System Plan, Revision 13

Due Date: May 2002

Commitment 3.3: Tank 49 Available for HLW service.

Lead Responsibility: Manager, Savannah River Operations Office

Deliverable: Tank 49 ready for HLW service

Due Date: October 2001

Commitment 3.4: Tank 50 Available for HLW service.

Lead Responsibility: Manager, Savannah River Operations Office

Deliverable: Tank 50 ready for either HLW or Salt Processing service

Due Date: March 2003

Commitment 3.5: Assess the technical feasibility of dispositioning the current Tank 48 material and returning Tank 48 to HLW service.

Lead Responsibility: Manager, Savannah River Operations Office

Deliverable: Report

Due Date: September 2002

Commitment 3.6: Return 2H evaporator to operations.

Lead Responsibility: Manager, Savannah River Operations Office

Deliverable: Operational 2H evaporator

Due Date: November 2001

Commitment 3.7: Complete Tank 37 modifications required for normal 3H evaporator operations

Lead Responsibility: Manager, Savannah River Operations Office

Deliverable: Tank 37 available as the drop tank for 3H evaporator

Due Date: December 2002

Subrecommndation 4. Reassess contractor incentives to ensure that near-term production at DWPF is not overemphasized at the expense of safety margin in the Tank Farms

Background: Under the current contractual arrangements, the SRS contractor is paid based on Performance Based Incentives (PBIs). In the calendar year 2000 contract development effort, the Department endeavored to develop a PBI package that balanced the overall HLW mission needs (safety, production, cost effectiveness) over the 6-year contract period without being overly prescriptive or a hindrance (real or perceived) to effective operations. The primary PBIs developed relate to waste volume reduction (evaporator overheads and useable tank space), tank closure, Authorization Basis development, and waste stabilization (canisters produced). Recognizing that changes may be needed, the contract is designed to adjust and add PBIs over the course of the six-year period based on issues and events to ensure safety, cost-effectiveness, and the expeditious cleanup of the HLW legacy.

Resolution: The Department accepts this subrecommndation. The Department will conduct an independent assessment of the current HLW PBIs using personnel chartered from the DOE-HLW Steering Committee (i.e. independent of the DOE-SR HLW management). The scope of the review will be focused on HLW PBIs to determine if they provide adequate balance and flexibility to meet mission objectives in a safe and efficient manner. It is expected that the review team will be led by a senior Department manager from another DOE HLW site, and that the team will be comprised of other HLW and contract experts from within the Department. The Department will factor the team's recommendations into the PBI package as part of the normal ongoing review of PBIs. As an example of this continually ongoing evaluation, the Department is considering the establishment of a new PBI to disposition low-source-term salt waste using the existing Saltstone Facility. If accomplished, this incentive has the potential to significantly improve the longer-term tank space availability options and shorten the salt processing operational completion date.

The Department implementation milestones for subrecommndation 4 are:

- Commitment 4.1: The Department will conduct an Independent Assessment of the HLW Performance Based Incentives
- Lead Responsibility: Chief of Staff, Office of Environmental Management
- Deliverable: Team Assessment Report
- Due Date: January 2002

5. Organization and Management

The Chief of Staff, Office of Environmental Management is the Responsible Manager for this Implementation Plan. He has responsibility to perform all associated planning, response, and implementation activities, consistent with guidance provided in *Interface with the Defense Nuclear Facilities Safety Board* (DOE M 140.1-1B). The Manager for the Savannah River Operations Office, will be the point of contact for the site-specific actions for this recommendation.

To ensure that the various Departmental implementing elements and the Board remain informed of the status of Plan implementation, the Department's policy is to provide periodic progress reports until implementation plan commitments are completed. For this Plan, the Responsible Manager and/or designee will provide quarterly reports (either in oral briefings or written format) to the Board and/or its staff.

This Plan requires sufficient flexibility to accommodate changes in commitments, actions, or completion dates that may be necessary due to additional information, improvements, or changes in baseline assumptions. The Department's policy is to (1) provide prior, written notification to the Board on the status of any Plan commitment that will not be completed by the planned milestone date, (2) have the Secretary approve all revisions to the scope and schedule of Plan commitments, and (3) clearly identify and describe the revisions and basis for the revisions. Fundamental changes to the Plan's strategy, scope, or schedule will be provided to the Board through formal revision and re-issuance of the Plan. Other changes to the scope or schedule of planned commitments will be formally submitted in appropriate correspondence approved by the Secretary, along with the basis for the changes and appropriate corrective actions.