

## **Fact Sheet for Radioactive Waste Management Process Comparison of DOE Order 5820.2A vs DOE O 435.1 requirements**

DOE O 435.1, *Radioactive Waste Management*, and its mandatory manual DOE M 435.1-1, are the current DOE radioactive waste management requirements related to the generation, treatment, storage, and disposal of radioactive wastes. They replace DOE Order 5820.2A, which has been cancelled. DOE Order 5820.2A is being removed from all RL contracts; the contractor requirements document of DOE O 435.1 is a requirements document for all RL contractors that generate radioactive waste. Please note that

DOE O 435.1 is applicable for wastes; it does not apply to product or to spent nuclear fuel.

DOE O 435.1 uses an implementation plan to show compliance with the order. DOE-HQ defines order compliance as meeting the following requirements:

- full compliance with all parts of DOE O 435.1 by 7/9/00 or
- issuance of an implementation plan, signed by the field office manager, which states how the order will be implemented

RL utilized a single implementation plan for Fluor, PNNL, and BHI. This plan was approved by the RL Manager on 7/6/2000. Please note that ORP has a separate DOE O 435.1 implementation plan for their contractors.

The RL implementation plan helps clarify which of the Field Element Manager requirements are being performed by the contractor versus RL. The major points of DOE O 435.1 that RL employees must fulfill are mostly basic program management oversight items. Some of these basic program management activities include such tasks as ensuring waste minimization/pollution prevention is incorporated in work scope, using the lessons learned process, and ensuring facilities operate under their appropriate authorization basis and permit requirements. There are specific waste management RL actions that are addressed, most of which were already RL requirements under DOE Order 5820.2A. These include:

- Development of Radioactive Waste Management Basis
- Requirements to obtaining a waiver for the use of non-DOE facilities for radioactive waste treatment, storage, or disposal
- Requirements related to the disposal of radioactive waste with no path forward to disposal

### How Radioactive Waste Management is reflected in RIMS

The RIMS description of Radioactive Waste Management is organized as follows:

1. A Radioactive Waste Management Program Description has been generated to capture the more general programmatic requirements such as ALARA, Defense in Depth, and waste minimization. It also refers to the more specific crosscutting Processes
2. Crosscutting Processes have been written to address the following actions:
  - Development of a waiver to use a non-DOE radioactive waste treatment, storage, and disposal unit
  - Resolution of such issues as a no path forward or incidental waste designation
  - Development of a disposal performance assessment
  - Development of the composite analysis for disposal actions

Questions related to these crosscutting processes can be addressed to Rudy Guercia (376-5494) or Todd Shrader (376-2725).