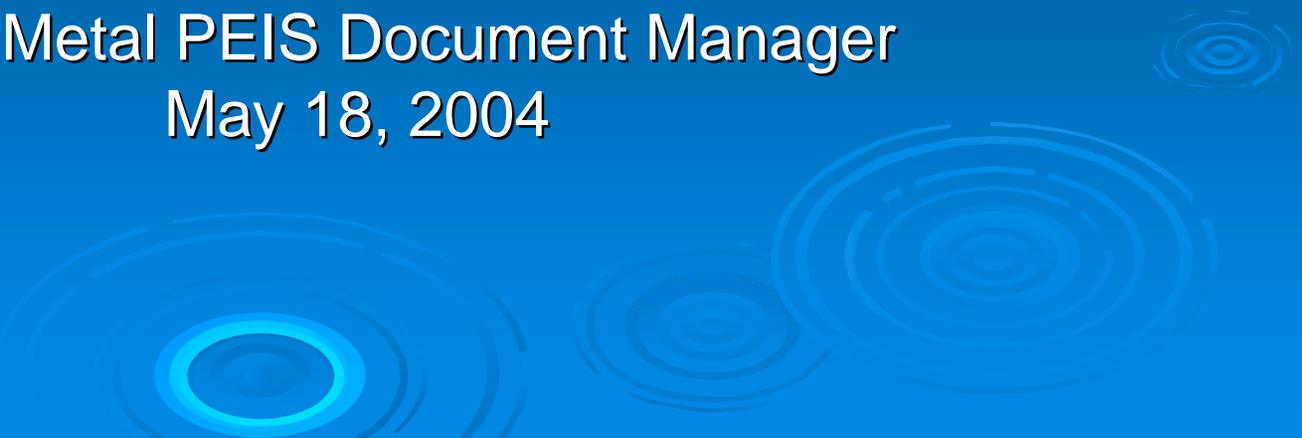


DOE Metals Recycling Policy Review

P2 Tele-video Conference

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May 18, 2004



OVERVIEW

- Background
- Status of Moratorium and Suspension
- Status of Scrap Metal PEIS
- NRC Rulemaking on Solid Materials
- EPA Proposed Rulemaking – Low Activity Radioactive Waste (LARW)
- Wrap-up/Questions

Background

- Historically, DOE has recycled scrap metal in order to facilitate cleanup of nuclear weapons sites and avoid disposal of valuable resources
- DOE has now begun major D&D of the weapons complex
- Many examples of past successes in recycling and reuse

K-770 and K-1094 Scrap Yards



Barter

- **Scrap metal bartered in exchange for clean up of yard**
- **Exceeding \$23 million in cost savings**
- **29,200 metric tons recycled**

Tower Shielding Facility Recycle



Sale

- Surveyed and sold clean material for recycle
- \$2.1 million cost savings
- 468 metric tons waste avoidance

K-1401 Decontamination Project



Barter

- Vendor decontaminated building in exchange for machine tools
- Sold the tools at public auction for over \$2.2 million in sales revenues
- \$691,629 cost avoidance
- 9,072 metric tons waste avoidance

Mound Plating Shop



Sale

Equipment sold for commercial reuse

- **\$17,500 asset received**
- **\$26,500 cost savings**
- **184 yd³ recycled**

ORNL Scrap Metal and Pans



Sale

- **\$20,000 asset received**
- **\$11.3 million cost avoidance**
- **2,973 metric tons scrap metal recycled**

Background (Cont'd)

- S-1 issued moratorium on unrestricted release of volumetrically-contaminated metals in Jan 2000
- Materials Reuse and Recycle Task Force studied policies on reuse, records, release
- DOE “Steel Mill” Study initiated
- In July 2000, S-1 suspended unrestricted recycling of scrap metal, emphasized internal recycling, and directed DOE Order revision

Background (Cont'd)

- Jan 2001, S-1 placed further emphasis on internal recycling (e.g., nickel, lead policies)
- S-1 also extended restrictions, put DOE Order revision on hold, and directed EIS be done
- First two PEIS contracts terminated, only public scoping completed
- EM-1 directed PEIS be federalized (Feb 2002)
- NRC announced rulemaking on control of solid materials in Feb 2003

Status of Moratorium and Suspension

- Both restrictions still in place; sites either accumulating or disposing
- Consideration on lifting not likely until NEPA process is complete
- Allowable metal releases:
 - Metals with volumetric radioactivity for restricted use (e.g., nickel to specified industrial use)
 - Scrap metal outside radiological areas for unlimited use, inside radiological areas for restricted use
 - Reuse (e.g., RW equipment, lead) and disposal
- Metals recycling for internal/regulated use (e.g., Ni) held up by ongoing NEPA, not moratorium

Status of Scrap Metal PEIS

- Analysis has been completed, Draft PEIS prepared
- Scope is limited to scrap metals (est. 0.7M tons)
 - Dose and Transportation (Human Health) Analyses
 - Environmental Analysis
 - Cost Analysis
 - Socio-economic Analysis
- Document reviewed by field, concurred on by affected programs (EM, NE, NNSA, SC, RW)

Status of Scrap Metal PEIS (Cont'd)

- Numerous comments (EH/GC) addressed, document returned to EH for final approval
- GC issues remain, require resolution at AS level
- Publication date for Draft PEIS??
- Public comment/meetings will follow
- Issuance of Final PEIS/ROD??

NRC Rulemaking – Control of Solid Materials

- Feb 2003 FR Notice:
 - Rule would address materials with “no, or very small amounts of, radioactivity”
 - Applicable to NRC-licensed facilities only
 - Broader range of materials, actions
 - Could result in new standards for recycle and disposal (EPA-regulated)
- DOE could adopt such a standard in the future (requires DOE NEPA)
- Proposed Rule to be published??

EPA Advance Notice of Proposed Rulemaking (ANPR) on Low Activity Waste

- Would address dual regulation of MLLW by defining “low activity” radioactive waste
- Focus on disposal of some mixed waste in RCRA Subtitle C facilities
- Could include “low activity” LLW as well
- Public comment period just ended
- Proposed Rule to be published??

Wrap-Up

- Significant uncertainty with schedule for sister agency efforts
- Outcome of EPA/NRC efforts could affect future economics of recycling
- Lack of final DOE metals recycling policy is affecting sites' cleanup/planning
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