



Department of Energy
National Nuclear Security Administration
Washington, DC 20585



September 2, 2015

MEMORANDUM FOR

RANDALL HENDRICKSON
ASSOCIATE ADMINISTRATOR FOR
MANAGEMENT AND BUDGET

JM Chronology
JM RECEIVED 9/14/15
OUR FOR REVIEW 9/21/15
DRB DISCUSSION 10/1/15

THROUGH:

INGRID KOLB
DIRECTOR, OFFICE OF MANAGEMENT

FROM:

RICHARD MEEHAN 
DIRECTOR, OFFICE OF NUCLEAR MATERIALS INTEGRATION

SUBJECT:

Notice of Intent to Develop *Nuclear Materials Disposition Guidance*
(Department of Energy Guide 410.2-1)

PURPOSE: U.S. Department of Energy (DOE) Order 410.2, *Management of Nuclear Materials* identifies the Office of Nuclear Materials Integration (ONMI) as the organization responsible for nuclear materials management policy, guidance, and integration of DOE agency-wide management, consolidation, and/or disposition of nuclear materials. Specifically, the Order directs ONMI to provide guidance to DOE field elements, as required, for Defined Use and No Defined Use nuclear materials. Further, the Order authorizes this office to review and evaluate justifications for nuclear materials designated as No Defined Use. DOE Order 410.2 also requires ONMI to provide guidance to DOE field elements regarding nuclear material discard limits in coordination with relevant DOE headquarters organizations.

DOE Order 474.2, *Nuclear Materials Control and Accountability* identifies ONMI as the office responsible for determining that accountable nuclear material is of no programmatic value to DOE when sites or facilities request to terminate regulatory controls for nuclear material as part of the disposition process. ONMI conducts a thorough analysis of DOE-needs in consultation with program offices and sites to determine whether the material may be required for other ongoing mission-related activities. DOE sites that have identified material for disposition, work with ONMI to complete the disposition process. This Guide will assist DOE sites in this effort by:

- providing a detailed explanation of the disposition process and associated requirements as specified in DOE Order 410.2 and 474.2;
- offering a clear, expeditious path for sites to request a determination of programmatic value for nuclear material targeted for disposition; and
- providing conservative, complex-wide disposition limits for select accountable nuclear materials.

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Justification Memorandum (Continued)

Consistent with direction from DOE Order 410.2, ONMI provides informal instructions and guidance (verbal, e-mail, and briefings), to the DOE sites, to establish administrative processes regarding nuclear materials disposition. In September 2013, ONMI issued guidance to the DOE sites in a preliminary document titled *Nuclear Materials Disposition Process Guidance – Phase I*. This preliminary document outlined general suggestive instructions on the disposition process. The proposed directive, *Nuclear Materials Disposition Guidance DOE Guide 410.2-1*, will further clarify and formalize the steps involved in the disposition process.

JUSTIFICATION: Description of the Guide: This Guide will explain the nuclear materials disposition process, formalize the Programmatic Value Determination (PVD) process, and approve Discard Limits for select accountable nuclear materials. A standardized PVD request form will be included as a separate fillable form. Sites can use this form to request approval to dispose of accountable nuclear material, or to advertise the material for potential reuse. There are no valid external, consensus or other “Standards (e.g., ISO, VPP, etc.)” available which can be used in place of this Guide.

Applicability: This guidance is applicable to all DOE sites and programs that manage accountable nuclear material. The *Nuclear Materials Disposition Guidance* is not prescriptive in nature but may be tailored and applied by programs and sites in a manner that meets their needs. The guide will not conflict with other applicable directives, laws, and regulations.

Development and Coordination: ONMI developed a draft of the Guide with the support of the Nuclear Materials Management Team (NMMT), a body consisting of Federal and contractor site nuclear material managers. Furthermore, ONMI circulated the draft of the Guide among the members of the Nuclear Materials Advisory Board, a DOE headquarters-level board consisting of a senior representative from each DOE headquarters organization that manages nuclear materials as well as other functional experts.

Request for an alternative processing time: ONMI request an alternative processing time of 90 days for the following reasons:

- This guide and its incorporated forms will be consistent with instructions and procedures already given to the DOE sites and have proven to function successfully.
- The draft of the guide was developed in coordination with site material managers.
- ONMI has already circulated the draft of the guide and solicited, resolved, and incorporated unofficial comments and edits from the principal program offices with nuclear material equities as well as interested parties.

IMPACT: The proposed Guide does not duplicate existing laws, regulations or national standards. This guide will not require revision of any existing requirements. Since its application is not mandatory, the guide does not contain any requirements and will not create undue burden on the DOE programs and sites. In fact, the Discard Limits that will be included in the Guide alleviates an unnecessary step of getting Headquarters PVD approval for certain low equity nuclear materials that will be disposed as waste. The Guide will serve as the basis for training site nuclear materials

Justification Memorandum (Continued)

managers on nuclear material disposition processes, including the PVD process and the use of discard limits. In recent meetings with the NMMT, the DOE site representatives expressed a sense of urgency and anticipation for the issuance of this Guide.

The processes that will be formalized in the Guide, such as the PVD process, are practices that are already functioning successfully. ONMI regularly reviews nuclear material that is no longer needed at a particular site and, on multiple occasions, has identified a critical mission need for such material at an alternate site. This Guide will help ONMI promote nuclear material redeployment and reuse resulting in cost savings and enhanced mission effectiveness for the Department. This Guide will formalize and enhance existing communication and processes between ONMI and the DOE sites, and will help sites be more effective in using existing resources to meet existing requirements under the aforementioned DOE Orders. Therefore, no additional costs or major impacts to programs or sites are anticipated.

WRITER: Nicholas Quintero, 301-903-0228

OPI/OPI CONTACT: Office of Nuclear Materials Integration / Dale Dunsworth, 301-903-5156

Ingrid Kolb, Director, Office of Management (MA-1):

Concur: [Signature] Nonconcur: _____ Date: 10-1-2015

Randall Hendrickson, Associate Administrator for Management and Budget (NA-MB-1):

Concur: [Signature] Nonconcur: _____ Date: 7 OCT 15

Requested Schedule for Directives Development

Draft Development (Writer – already developed – final edits)
Review and Comment (RevCom)
Comment Resolution (Writer)
Final Review
Total

Days

~~15~~

~~15~~

~~30~~

~~30~~

~~90~~

In accordance with the DRB's decision, the normal 15 day process will be used.