# Radioactive Waste Management



# Generic Waste Acceptance Criteria (WAC) and the UK Disposability Assessment Process

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# **Structure of Presentation**

- Derivation of Generic Waste Packaging Specifications
  - -Historic Low Heat Generating Waste (LHGW) specifications
  - -Basis in generic Disposal System Safety Case (DSSC)
  - -Evolution to requirements
  - -Systematic development of High Heat Generating Waste (HHGW) requirements
  - -Relationship between specifications/requirements and WAC
- Assessment and endorsement against generic specifications
  - -Disposability Assessment process
  - -Current position and progress
- Maintenance of existing endorsements and non-compliance
  - -Periodic Review
  - -Cross-cutting review
  - -Management of non-compliance



# Derivation of Generic Waste Packaging Specifications



### **Getting Packaging Right First Time**





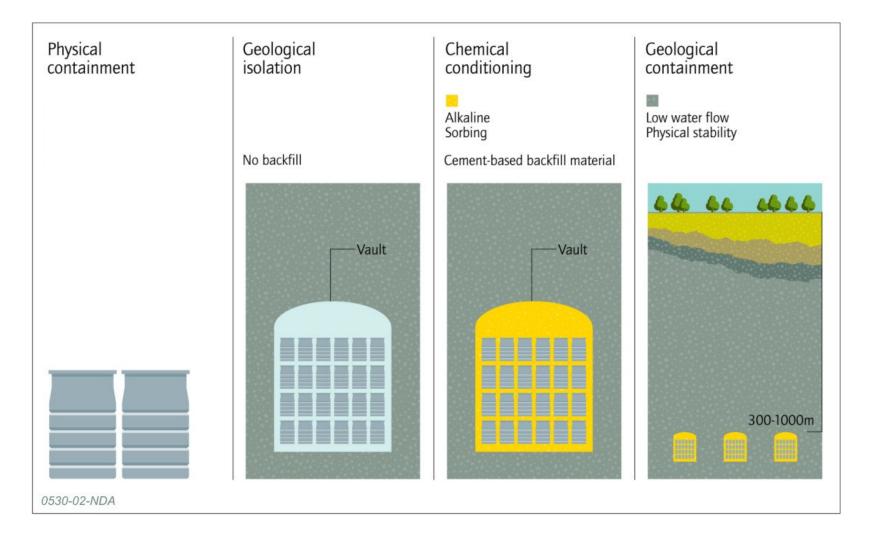


# **Illustrative Geological Disposal Concepts**

Illustrative Geological Disposal Concept Examples <sup>d</sup>	
ILW/LLW	HLW/SF
UK ILW/LLW Concept	KBS-3V Concept
(NDA, UK)	(SKB, Sweden)
Opalinus Clay Concept	Opalinus Clay Concept
(Nagra, Switzerland)	(Nagra, Switzerland)
WIPP Bedded Salt Concept	Gorleben Salt Dome Concept
(US-DOE, USA)	(DBE-Technology, Germany)
	ILW/LLW UK ILW/LLW Concept (NDA, UK) Opalinus Clay Concept (Nagra, Switzerland) WIPP Bedded Salt Concept

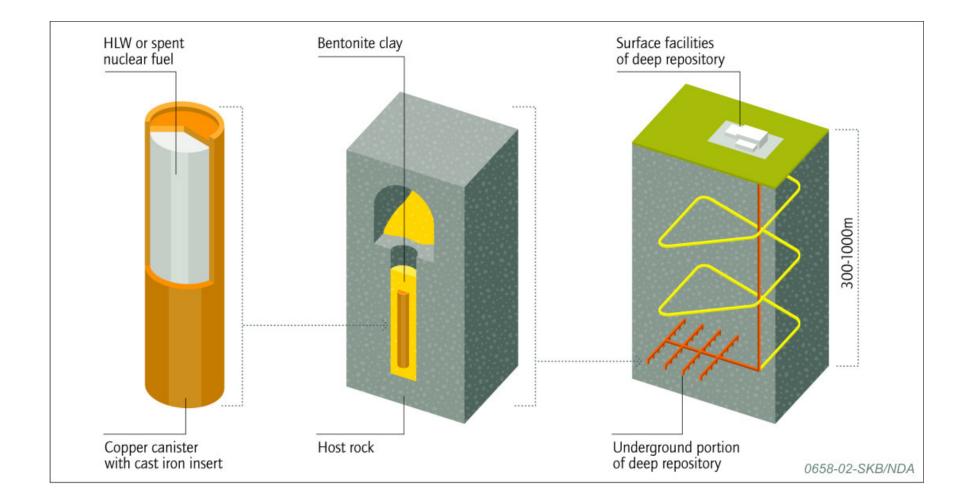


# **DSSC: Multi-barrier Containment for LHGW**



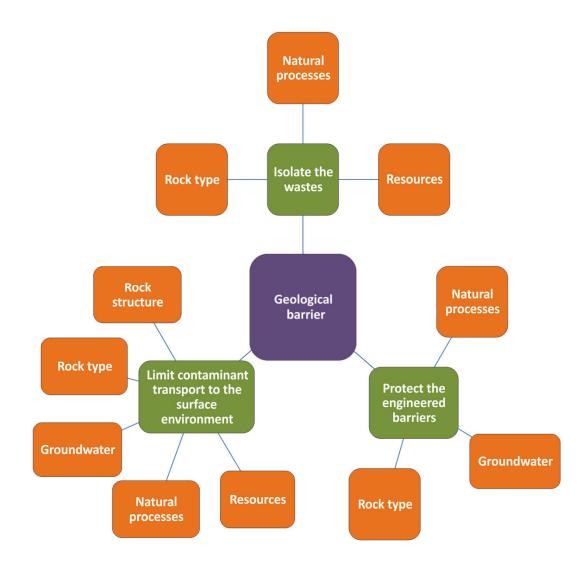


#### **DSSC: Multi-barrier Containment for HHGW**



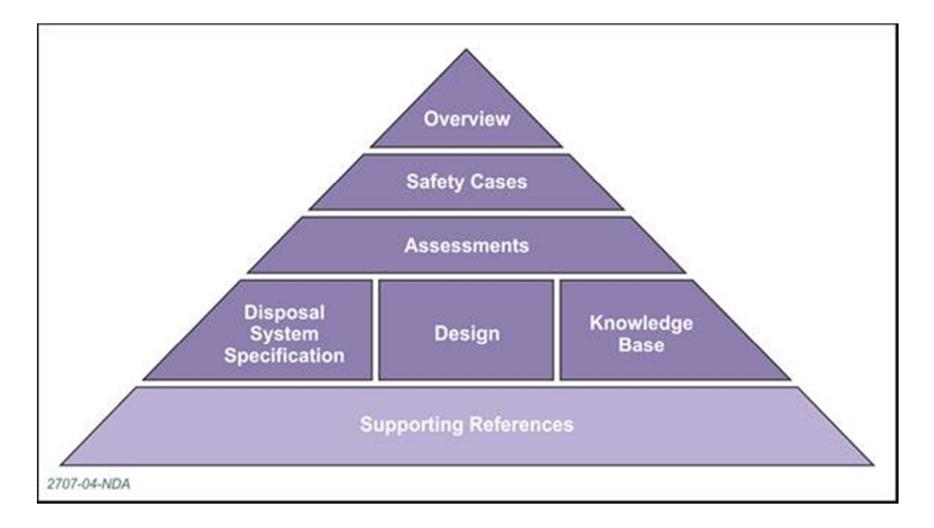


# **Developing a Generic Safety Case**





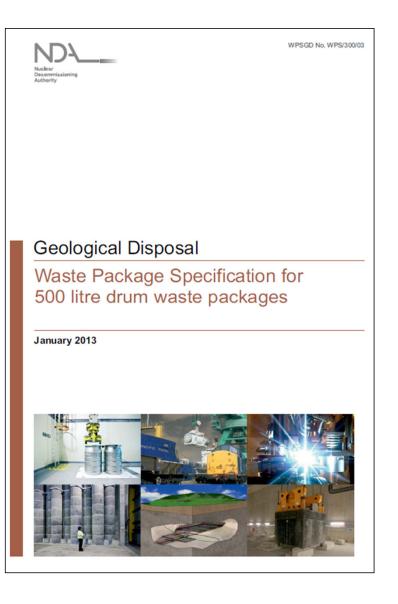
## 2016 generic DSSC





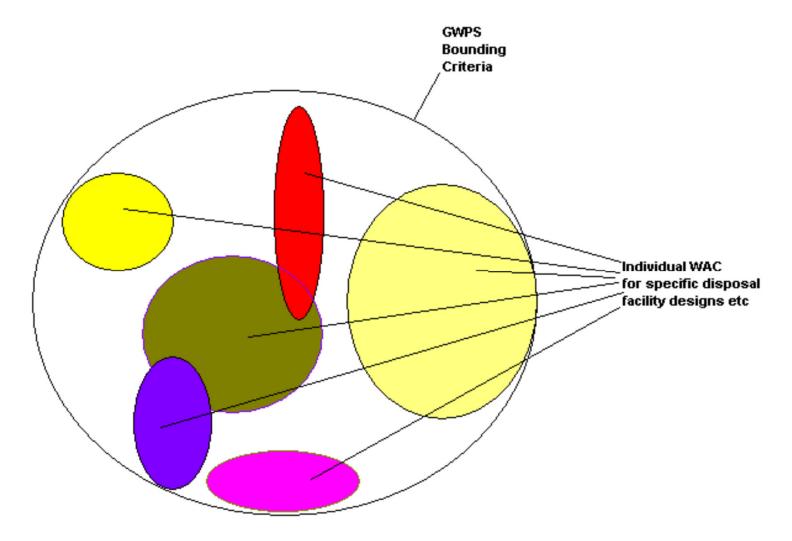
# **Waste Packaging Specifications**

- Waste Packaging Specifications define the key features and requirements for waste packages
- Precursor of GDF waste acceptance criteria but broader in application, recognising uncertainty associated with generic siting requirements
- <u>http://www.nda.gov.uk/publications/</u>
- Current version is WPS/220



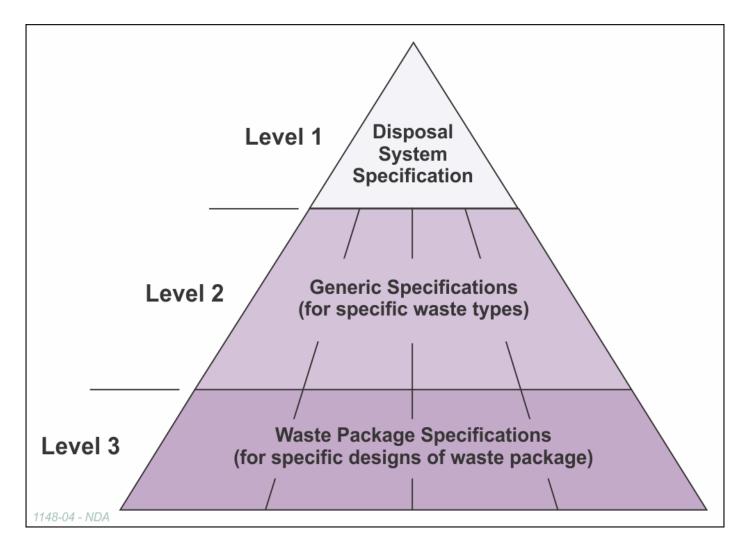


#### **Bounding Specifications**





#### **Hierarchy of Packaging Specifications**





# **Development of Packaging Specifications**

- RWM uses a well-established methodology for the production of the packaging specifications which requires that they are founded on:
  - -The definition of disposal concepts for the waste type (e.g. LHGW);
  - -Generic designs of the transport and disposal facility systems as they apply to waste packages containing that waste type;
  - -Generic safety assessments for the transport and disposal of the waste packages (the latter covering both disposal facility operations and the post-closure period);
  - -Regulations for the storage, transport and disposal of the waste.
- The aim of each specification is to define the bounding requirements for all relevant waste packages
- All of the packaging specifications adopt a similar form by defining the standard features (e.g. dimensions, lifting features etc.) and performance requirements (external dose rate, impact and fire accident performance etc.)

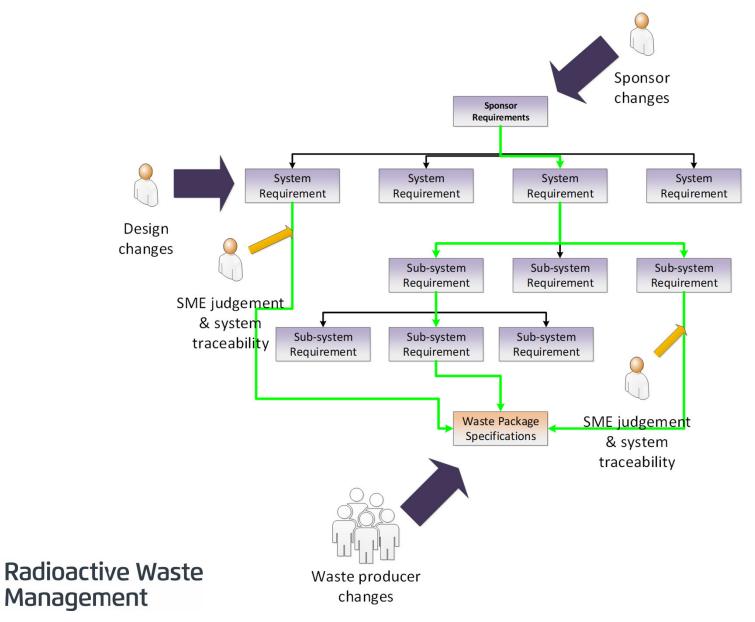


# **Evolution to Requirements**

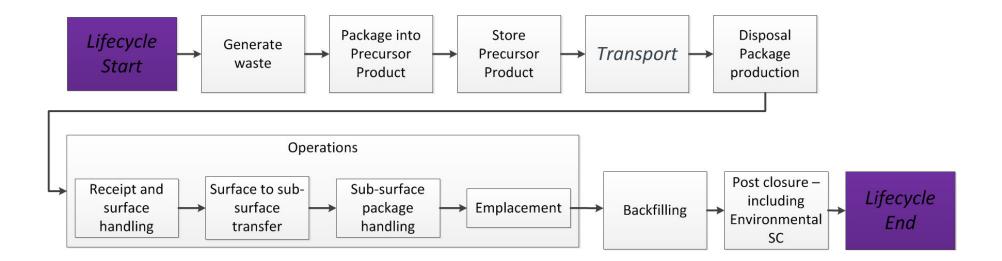
- Use a full and robust systems engineering approach to derive, develop and organise the disposal requirements for waste packages to a level that is appropriate for current knowledge base and programme
- Addressing challenges emerging from historic specifications approach:
  - Underpinning for the WPS is not rigorous or well-documented in some cases, cannot be directly linked to safety cases
  - -Lack of clear and traceable ownership of individual elements
  - -No single source of information
  - Poor requirements management and tools across organisation, so poor flow of requirements to WPS
  - -Programme of work to address underlying issues not recognised
- Clear placement of packaging requirements within a comprehensive approach for the GDF and safety cases



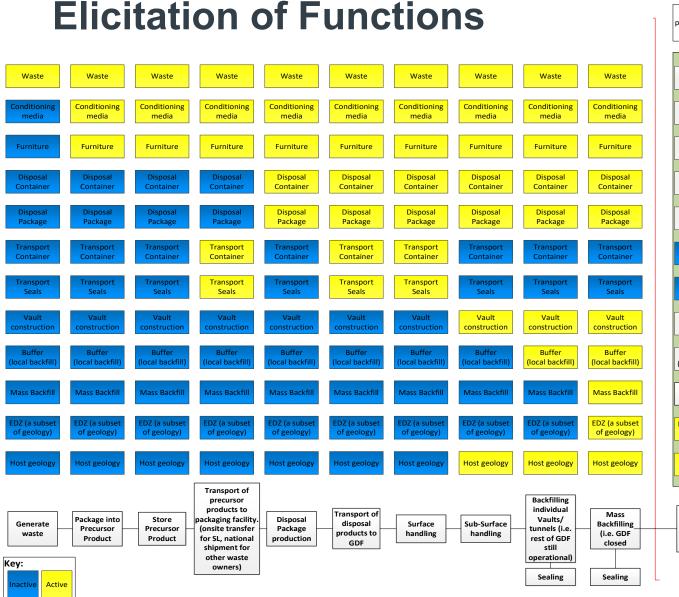
# **Requirements and Packaging Specifications**



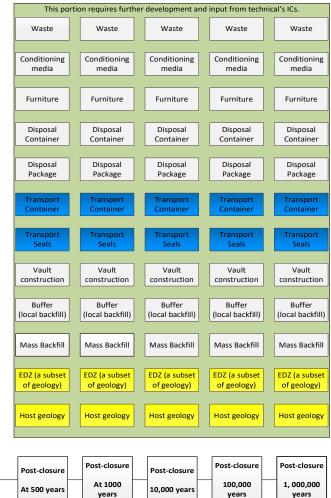
## **Packaging Life-cycle for Requirements**







This portion of the lifecycle is intended to indicate that the barriers will cease to perform their intended function over given time periods (will be different for different waste streams).



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#### **Evolution to Waste Acceptance**

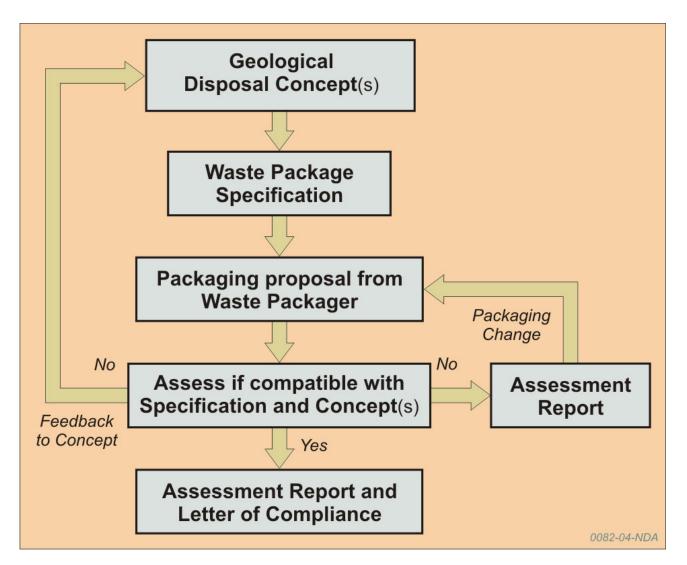
- Definition of WAC for a disposal facility has two strands:
  - -The definition of the WAC themselves
  - Procedures by which the acceptability of individual waste package can be judged; the acceptance process
- WAC ultimately will be derived from the safety case submissions for an operational GDF, based on evolution of packaging requirements
- Extended period before disposal allows progressive increase in confidence in the acceptability and early action if deviations are recognised
- Development of WAC, and waste acceptance, is an evolutionary process over an extended period, enabled through:
  - -Increasing clarity of the criteria that ultimately would become WAC
  - -Maintenance of clear and sufficient records
  - -Building confidence in the condition of waste packages



# **Assessment and Endorsement against Generic Specifications**



#### **Assessment Process – Overall Picture**



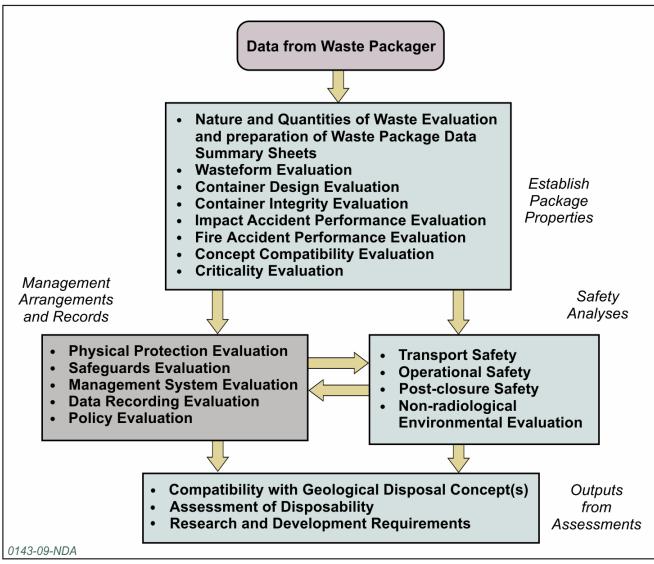


## **Assessment Process – Key Elements**

- Inventory challenge:
  - -Origin of waste, fissile content, variability / uncertainty
- Package design and properties:
  - -Container type, immobilisation matrix (if any), accident performance
- Compliance with disposal system:
  - -Disposal concept and design, package specifications
- Fulfilment of management requirements
  - -Records, Management System, criticality compliance
- Compatibility with safety cases:
  - -Transport, operations, environmental (post-closure)



# **Assessment Process – Detailed Structure**





# Significance of a Letter of Compliance (LoC)

• Obtaining endorsement through the issue of a Letter of Compliance (LoC) from RWM means that:

- -The packaging proposals are in line with the specifications and requirements for a GDF (i.e. they are being packaged in line with Government policy)
- -The GDF is being designed to accommodate these wastes as a feed stream
- The waste packager has a statement (essentially a snapshot) of the situation/progress with the disposability assessment at any point in the process
- Endorsement may be offered in a staged manner to support development of packaging proposals over time:
  - -Conceptual (initial support for the general concept)
  - -Interim (confirmation of process through R&D)
  - -Final (endorsement of the complete process as implemented)



## **Innovative Packaging Proposals**

- RWM welcomes innovative packaging proposals
- Packaging proposals that are not intended to comply with an existing Waste Package Specification (WPS) and/or to fulfil the currently understood safety functions of a GDF
- Procedure in place to define and analyse information requirements prior to Disposability Assessment, areas to be considered include:
  - -GDF design changes and handling challenges
  - -Complexity and impact on operating regime
  - -Applicability of safety cases and fulfilment of safety functions
  - -Knowledge gaps
- Disposal of innovative packages might incur costs and dis-benefits for geological disposal
  - -Need to understand balancing benefits earlier in the lifecycle to justify change



# Maintenance of Existing Endorsements and Non-compliance



# **Periodic Review and Package Assurance**

- Maintain and manage the validity of existing endorsements and maintain confidence in the disposability of both waste packages currently being produced and existing waste packages in interim storage
- Manage confidence when challenged by the following:
  - -Evolution of the Disposal System Safety Case;
  - -Acquisition of new knowledge (arising knowledge);
  - -Recognition of changes to regulatory expectations for disposal;
  - -As a result of modification to the existing scope of an endorsement;
  - -Identification of significant issues or shortcomings with an endorsement.
- Primary activities:
  - -Annual Review (Q3 each year)
  - -Periodic Review Disposability Assessment
  - -Cross-cutting reviews
  - -Technical Audits



# **Consolidation and Annual Review**

• Programme of Disposability Assessments determined by waste custodians, with assessment not planned systematically

-Commenced in late 1980's, almost 1000 assessments completed

- Currently, there are about 140 Final stage Letters of Compliance (LoCs)
- Many overlap or represent incremental changes as process scope evolves
- Final stage LoCs are being consolidated
  - -Similar wastes, similar packaging processes, similar packages
- Annual Review tests the status of each endorsement, capturing any changes during the current year
  - -Identifies any requirement for updated or improved Disposability Case
  - -Identification of drivers for Cross-cutting Reviews
  - -Status of previous Technical audits



# **Periodic Review Disposability Assessment**

- Updating of the 'Disposability Case' to current basis (*eg* new DSSC) through a further, targeted Disposability Assessment
- Integration of recent changes, extensions and/or removal of qualifications
- Use data from package records for assessment inventories
- Support the consolidation into singular endorsement, re-visiting and aligning the arguments supporting individual previous assessments

• Also may be used to provide modern basis for endorsement consistent with knowledge management expectations (improved documentation *etc*)



## **Cross-cutting Review**

- 'Single issue' review across some or all existing consolidated endorsements
- Driven by 'arising knowledge' from continuing programmes of technical development, including external sources
- May be recognised through Annual Review or initiated ad hoc



# **Management of Emergent Non-compliance**

• (Periodic Review) Disposability Assessment or Cross-cutting Review may recognise that existing endorsement is not longer valid, or not applicable to some fraction of the waste (emergent non-compliance)

• Early recognition allows timely action:

- -Additional research or development to address the challenges
- -Recognition of requirement for (or risk of) future re-work of waste packages
- Introduction of special arrangements or potential changes to the Disposal System requirements to accommodate challenges



# **Summary and Key Points**



# Summary

- Existing packaging specifications are derived from generic safety cases
- Evolving into a requirements-based system, providing more traceability and consistency
- Disposability Assessment systematically tests compatibility of proposals and audits the completeness of safety cases/requirements for real wastes
- Assurance approach provides for continuing maintenance of the validity of the endorsements (and packages produced under them)
- Provides for early recognition of emerging non-compliance, allowing timely intervention and/or risk management
- Continuous management of acceptability of wastes, providing gradual waste acceptance and confidence in future disposal

