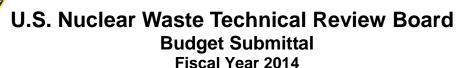
U.S. Nuclear Waste Technical Review Board



Fiscal Year (FY) 2014 Budget Request Submittal

Including Board Performance Goals and Priority Tasks for FY 2014

April 10, 2013



Summary

The U.S. Nuclear Waste Technical Review Board (Board) is an independent federal agency in the Executive Branch. The Board performs ongoing unbiased peer review of the technical and scientific validity of activities undertaken by the Secretary of Energy related to the Nuclear Waste Policy Act (NWPA) (P.L. 97-145, as amended). As the U.S. Department of Energy (DOE) begins implementing the Administration's *Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste* announced in January 2013, the Board also will provide enhanced oversight of storage, transportation, and disposal activities undertaken by DOE as part of the Strategy. In addition to reviewing DOE activities, the Board advises and makes recommendations to Congress and the Secretary on technical and scientific issues related to managing and disposing of spent nuclear fuel (SNF) and high-level radioactive waste (HLW). The Board's technical and scientific perspective and its ongoing and objective evaluation can enhance confidence in the technical and scientific validity of DOE activities.

The Board's budget request for fiscal year (FY) 2014 is \$3,400,000, which is equal to its request for FY 2013. The requested amount reflects the Board's commitment to sound budgeting and cost-effective management practices.

The Board's Mission

The Board was established in the 1987 amendments to the NWPA (Public Law 100-203). According to the Legislative History of the Act, Congress intended that the Board should perform an evaluation of the technical and scientific validity of DOE activities related to implementation of the NWPA and provide objective expert advice to Congress and the Secretary of Energy on technical and scientific issues related to the management of commercial and DOE-owned SNF and HLW. In accordance with its statutory mandate, the Board performs ongoing, independent, and integrated technical and scientific peer review of DOE activities, including those related to transporting, packaging, storing, and disposing of SNF and HLW. The Board is required to report its findings, conclusions, and recommendations to Congress and the Secretary at least twice yearly.

The Board's Continuing Role

For more than 20 years, DOE focused on developing a deep geologic repository for the permanent disposal of SNF and HLW at Yucca Mountain in Nevada. In early 2010, DOE petitioned the NRC to withdraw the Yucca Mountain license application, which had been submitted to NRC in 2008, and Secretary of Energy Steven Chu established the Blue Ribbon Commission on America's Nuclear Future (BRC) to consider alternatives for managing the back end of the nuclear fuel cycle. The BRC issued its final report in January 2012; DOE announced its *Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste* in January 2013. The Strategy represents the Administration's response to the final report

and recommendations of the BRC, and provides "an initial basis for discussions among the Administration, Congress and other stakeholders on a sustainable path forward for disposal of nuclear waste." The Board's statutory mission includes responsibility for evaluating the technical and scientific validity of DOE activities undertaken as part of the Strategy. The Board's technical and scientific evaluation also can help inform policy discussions on the management and disposal of SNF and HLW.

The Board's mission is both different from and complementary to the roles of other entities involved in nuclear waste management. The Board focuses on technical and scientific issues related to the design and performance of the waste management system, including the integration of system components such as transportation, packaging, and handling of SNF and HLW. The Board is (1) unbiased and unconstrained by any stake in the outcome, other than technical and scientific credibility of the activities it reviews; (2) limited by statute to reviewing the technical and scientific validity of DOE activities; and (3) a permanent independent federal agency whose 11 members are nominated by the National Academy of Sciences and appointed by the President.

The Board's Performance Plan for FY 2014

The Board has established three overarching Performance Goals to help facilitate and focus its ongoing technical evaluation. The Board also identifies, on an annual basis, Priority Tasks that support the implementation of the Performance Goals. Following are the Board's three Performance Goals and associated Priority Tasks for FY 2014.

Performance Goal 1. In accordance with its statutory mandate, the Board will continue its technical and scientific peer review and evaluation of DOE activities related to implementation of the NWPA, including activities undertaken as part of the Administration's Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste. The Board will report its findings to Congress and the Secretary.

Priority Tasks Related to Performance Goal 1

Task 1-A. The Board will evaluate and report on the technical and scientific validity of activities proposed or undertaken by DOE's Office of Nuclear Energy (DOE-NE) related to SNF and HLW management, including the following:

- Research on the potential waste-isolation capability of different waste forms in various geologic media, including thermal modeling
- Evaluation of various types and design features of back-filled engineered barriers systems and materials
- Evaluation of repository designs, including deep borehole disposal
- Research on the engineered barrier system, including whether direct disposal of existing storage containers can be accomplished in various geologic media
- Evaluation of the implications of repackaging SNF currently loaded in dry-storage casks for disposal in a repository

- Research on the technical consequences of very long-term storage of SNF, and subsequent transportation of dry-storage casks
- Evaluation of issues related to transporting SNF from nuclear utility sites to disposal or consolidated storage facilities.

However, the activities to be reviewed by the Board may change, depending on which activities are actually planned for, or undertaken during, FY 2014 by DOE.

Task 1-B. As directed by the U.S. House of Representatives Subcommittee on Energy and Water Development, Committee on Appropriations, the Board will periodically update its evaluation and report on activities undertaken by DOE's Office of Legacy Management (DOE-LM) related to preserving Yucca Mountain project data and documents and other materials.

Task 1-C. The Board will evaluate and report on the technical validity of activities undertaken by DOE's Office of Environmental Management (DOE-EM) related to the disposal waste form and issues related to the transportation, and disposal of DOE-owned HLW and SNF.

Performance Goal 2. The Board will develop and compile objective technical information to advise Congress and the Secretary on technical issues related to SNF and HLW management and disposal.

Priority Tasks Related to Goal 2

Task 2-A. The Board will use its computer-based systems analysis tool, the Nuclear Waste Assessment System for Technical Evaluation (NUWASTE), to analyze the potential impact of different waste management options such as the need for repackaging SNF from the storage canisters being loaded at the nuclear power stations and to identify factors related to SNF transportation that could be used to evaluate proposed locations for consolidated storage facilities for SNF.

Task 2-B. The Board will continue to assess the implications of the trend to higher fuel burnups on SNF management and disposal.

Task 2-C. The Board will continue to monitor changes in how burnup credit is taken into account in the licensing of equipment and facilities for storage, transportation, and disposal of SNF and the impact of this on the SNF management system.

Performance Goal 3. The Board will gather information and report findings and recommendations from experience gained over more than twenty years of reviewing the U.S. nuclear waste management and disposal program and from observing waste management efforts in other countries.

Priority Tasks Related to Goal 3.

Task 3-A. The Board will continue to update and extend the analyses presented in the *Survey of National Programs Report* issued in December 2009 and is planning to issue a revised report during FY 2014.

Task 3-B. The Board will continually gather information on work undertaken to characterize repository sites in other countries and will issue reports, factsheets, and letters when there is significant new information.

Task 3-C. The Board will report on issues related to repository siting, including the experiences of national programs in other countries related to implementing a consent-based approach to facility siting.

Accomplishing the Performance Goals and Priority Tasks

Information Gathering. Public Law 100-203 grants significant investigatory powers to the Board: "The Board may hold such hearings, sit and act at such times and places, take such testimony, and receive such evidence as it considers appropriate." At the request of the Board, and subject to existing law, DOE is required to provide all records, files, papers, data, and information necessary for the Board to conduct its technical review, including drafts of work products and documentation of work-in-progress. According to the Legislative History of the NWPAA, Congress provided such access with the expectation that the Board will review and comment on DOE decisions, plans, and actions as they occur, not after the fact.

Much of the Board's peer review and information gathering takes place at open public meetings where technical information is presented according to an agenda prepared by the Board. At these meetings, Board members and staff question presenters, and time is provided at the meetings for comments from interested members of the public. The Board typically holds two or three public meetings each year. Board panels and other small groups of Board members and staff meet, as needed, to investigate specific technical topics. The Board's public meetings are typically announced in the *Federal Register* four to six weeks before they are held.

The Board also gathers information from site visits; visits to national laboratories and facilities; and meetings with DOE and national laboratory and contractor staff working on specific projects and programs. Board members and staff attend national and international symposia and conferences related to the science and technology of SNF and HLW management and disposition. From time to time, Board members and staff visit other countries to meet with organizations involved in the management of SNF and HLW to observe their programs and review best practices, perform benchmarking, and assess potential analogs, among other things. The information gathered is used to enhance the Board's technical review of DOE programs and to advise Congress.

Technical Analysis. Analysis of technical information is performed by Board members with assistance from a small, full-time senior professional staff. When necessary, the Board is authorized to hire expert consultants to perform in-depth reviews of specific technical and scientific topics. On the basis of these analyses, the Board reports its findings and recommendations to Congress and the Secretary of Energy. All Board reports, testimony, correspondence, and meeting agendas, transcripts, presentations, and public comments, are posted on the Board's Web site at www.nwtrb.gov.

Board Panels. The Board maintains the option of organizing topical panels and working groups to help facilitate and focus its technical review and accomplish its Performance Goals and Priority Tasks.

Evaluation of Board Performance — FY 2012

The Board's progress in achieving its priority tasks is reviewed quarterly and a qualitative evaluation of the Board's performance is performed annually. This performance evaluation is used as input for the development of the Board's annual budget submittal. The Board's annual performance evaluations are included in "Summary Reports" that are issued periodically.

Following is an evaluation of the Board's performance in completing Priority Tasks established for FY 2012. (All documents referred to in the evaluation are available on the Board's website: www.nwtrb.gov.)

Performance Goal 1. In accordance with its statutory mandate, the Board will continue its technical peer review and evaluation of DOE activities related to implementation of the NWPA and will report its findings to Congress and the Secretary.

Goal 1 Priority Tasks

Task 1-A. Evaluate and report on the technical validity of activities proposed or undertaken by DOE-NE's Office of Used Fuel Disposition Research and Development, including the following:

- Generic R&D on potential geologic media for deep geologic disposal
- Generic Engineered Barrier System Evaluation
- Thermal modeling for repositories in granite, clay, and salt
- R&D and technical bases for very long term storage of SNF
- Issues related to transporting SNF after very long-term dry storage
 - ➤ Performance Evaluation, Task 1-A, Bullets 1-5: The Board evaluated and reported on the technical validity of DOE activities referred to in Task 1-A, by undertaking the following activities:

Board Meetings – The Board held a meeting in Arlington, Virginia, on January 9, 2012, at which the DOE presented its work on generic repository concepts and thermal analysis and the compatibility of commercial storage containers with the waste management system. On March 7, 2012, the Board met in Albuquerque, New Mexico, where it heard and commented on presentations by DOE staff on activities related to repository site-selection criteria, performance assessment models for geologic media, engineered barrier systems for different geologic media, and assessment of the potential use of deep borehole disposal for permanent disposal of SNF and HLW.

Board Correspondence – The Board provided comments to DOE on the recommendations made in the final report of the Blue Ribbon Commission on America's Nuclear Future, including the following:

- "The Board agrees with the Commission's position that disposal must be pursued with the same vigor as interim storage, because both need to be done in order to provide confidence that there is a solid integrated technical solution to the problem of the disposition of nuclear waste."
- "...it is very important that DOE take into account its past efforts related to developing siting criteria along with similar work that has been undertaken by nuclear waste repository programs in other countries. The Board notes that generic studies do not replace the need to focus on specific geologies and potentially available sites in the Unites States..."
- "The Board concurs strongly with the Commission that research is needed on fuel degradation mechanisms and other factors that may affect the ability to store SNF for long periods."

The Board also provided detailed comments to DOE in its December 8, 2011, letter on DOE's *Gap Analysis to Support Extended Storage of Used Nuclear Fuel*. In its letter to DOE on December 30, 2011, the Board commented on DOE's generic research on options for the disposition of HLW and SNF. The Board noted that, in establishing research priorities, deep mined geologic disposal should have a higher priority than deep borehole disposal. The Board also recommended that work should be continued that has been undertaken by DOE and other groups involving the implications of long-term storage and subsequent transportation of SNF. In its letter to DOE dated March 28, 2012, the Board commented on DOE research related to generic repository site-selection criteria, storing SNF for extended periods, and deep borehole disposal.

Task 1-B. Evaluate and report on activities undertaken by DOE's Office of Legacy Management (DOE-LM) related to preserving Yucca Mountain data and documents. The Board is working with DOE-LM to develop a scope of work and to assess the preservation and accessibility of DOE documents. The Board will provide feedback in its summary reports to Congress and the Secretary on progress in this area.

➤ Performance Evaluation, Task 1-B: Discussions with DOE have been ongoing for more than a year as documents have been transferred from Las Vegas, Nevada, to the DOE facility in Morgantown, West Virginia for preservation. In August 2012, Board staff visited the DOE-LM facility to conduct a review of DOE-LM preservation activities; the Board is preparing a report on the basis of that review, which it plans to issue in FY 2013.

Task 1-C. Evaluate and report on the technical validity of activities undertaken by DOE-EM related to storage, transportation, and disposal of DOE-owned SNF and HLW. In FY 2012-2013, the Board will:

- Complete a report started in FY 2011 on management of DOE-owned SNF and HLW at DOE facilities.
 - ➤ Performance Evaluation, Task 1-C, Bullet 1: The Board is in the process of finalizing the Report, which is scheduled to be issued before the end of 2013.
- Monitor progress and follow up on issues raised in Board letters, such as the final disposition form and treatment of calcined waste at Idaho National Laboratory (INL).
 - Performance Evaluation, Task 1-C, Bullet 2: The Board commented on this issue in an October 21, 2010, letter to Assistant Secretary Inés Triay. The Board recommended that the technical basis for the design lifetime estimates of the calcined waste storage facilities should be examined in detail, and "the results of the examination including any assumptions regarding inspection and maintenance frequencies should be conveyed" to the DOE programs carrying out research on very long-term dry storage. The Board also observed that DOE's decision to process the calcined waste using hot isostatic pressing was in part a decision made based on the cost of alternatives, and that decision could increase the number of containers requiring storage, transportation, and disposal. The Board recommended that DOE undertake another cost comparison of alternative processing technologies that takes into account appropriate technical assumptions and potential risks. During FY 2012 the Board also requested DOE to present an update on its plans for processing the calcined waste at the Board's public meeting that was being planned for early in FY 2013.
- Evaluate decontamination and decommissioning activities and the effects of the activities on the generation of HLW
 - Performance Evaluation; Task 1-C, Bullet 3: This Task will be carried forward into FY 2013.
- Evaluate and report on technical issues associated with long-term storage and transportation of HLW and DOE-owned SNF.
 - Performance Evaluation; Task 1-C, Bullet 4: The Board sent a letter to DOE on December 8, 2011, commenting on DOE's draft report, Gap Analysis to Support Extended Storage of Used Nuclear Fuel; the Board agreed with the high priority placed on the technical basis for taking credit for high-burnup fuel. The Board suggested testing methods and recommended opening and examining representative dry-storage systems periodically.

Performance Goal 2. The Board will develop and compile objective technical information to advise Congress and the Secretary on technical issues related to SNF and HLW management.

Goal 2 Priority Tasks

Task 2-A. Investigate the technical comparison of performance issues related to a repository site with an oxidizing environment and a repository site with a reducing environment.

➤ Performance Evaluation, Task 2-A: This work was undertaken by DOE. The Board will consider whether to issue a report assessing DOE's activities, or possibly a report on its own work, during FY 2013 and FY 2014.

Task 2-B. Explore options for expanding the application of the Board's computer-based systems analysis tool, NUWASTE, for system enhancements, and for other activities.

- ▶ Performance Evaluation, Task 2-B: The Board has undertaken analysis of the effects of different fuel cycle scenarios on waste volumes and the implications of partitioning for the characteristics of the waste forms generated and is developing a basis for analyzing the attributes of proposed sites for consolidated storage facilities. As this work continues, the Board will consider issuing reports on the results of these analyses.
- **Task 2-C.** Develop information on generic disposal issues associated with designing repositories for specific waste forms and with optimizing HLW and SNF package sizes as a function of potential repository geologic media.
 - Performance Evaluation, Task 2-C: In a March 28, 2012, letter to Dr. Peter Lyons, the Board noted that waste-package size will have a significant effect on repository design and that the large storage containers currently in use at reactor sites could require substantial operational and engineering interventions if directly disposed of in a repository, especially one located in shale or granite rock. The Board's report on "Lessons Learned" from the Yucca Mountain program also recommended that consideration should be given to using different methods of deep geologic disposal for different waste forms.
- **Task 2-D.** Assess the effects of taking burnup credit on the management and disposal of SNF.
 - Performance Evaluation, Task 2-D: The Board is in the process of developing an analysis of this issue that may be used as the basis of a Board fact sheet or report.
- **Task 2-E.** Evaluate the impact of the projected trend towards SNF with higher burnup.
 - Performance Evaluation, Task 2-E: The Board has used its NUWASTE systems analysis tool to investigate this issue. An analysis has been prepared that will be used to review work being undertaken by DOE and this may form the basis of a Board fact sheet or report.

Performance Goal 3. The Board will gather information and report findings and recommendations from experience gained over more than twenty years of reviewing the U.S. nuclear waste management and disposal program and from observing waste management efforts in other countries

Goal 3 Priority Tasks

- **Task 3-A.** Update the *Survey of National Programs Report*, issued in December 2009. The tables in the widely-used report on programs in 13 countries will be revised to reflect changes that have occurred since the original report was completed, and information on programs in other countries will be added, to the extent it is available.
 - ➤ <u>Performance Evaluation, Task 3-A</u>: There are significant changes currently in progress in several of the national programs included in the survey report. Consequently, the Board deferred updating the report until FY 2013 to include the results of these changes in the revised report.
- **Task 3-B.** Gather information on the basis for assessing site-suitability and "best practices" that can be determined from work done to characterize repository sites in other countries. The information may form the basis for a report.
 - ➤ <u>Performance Evaluation, Task 3-B</u>: The Board is in the process of preparing the report that is scheduled to be released by the end of calendar year 2013.
- **Task 3-C.** Evaluate the appropriate mix of engineering and science in repository development, natural transition points for a change in the mix, and how science and engineering can be best integrated. The Board may issue a report based on its evaluation.
 - Performance Evaluation, Task 3-C: After analysis and consideration of all the issues, the Board opted not to issue a report on this subject.
- **Task 3-D.** Observe the management in other countries of spent MOX and recycled uranium fuel from thermal reactor operations.
 - ➤ <u>Performance Evaluation, Task 3-D</u>: The Board reviewed this issue as part of the preparation of the update on the Survey report and is taking account of the information collected in the continued development of the NUWASTE analysis tool.

Nuclear Waste Technical Review Board

Salaries and Expenses

(Including Transfer of Funds)

For necessary expenses of the U. S. Nuclear Waste Technical Review Board, as authorized by Public Law 100-203, section 5051, \$3,400,000 to be derived from the Nuclear Waste Fund and to remain available until expended.

Budget Details

To fulfill its statutory mandate for reviewing the technical and scientific validity of activities undertaken by the Secretary of Energy related to nuclear waste management and for providing independent technical information and advice to Congress and the Secretary, the Board requests \$3,400,000 for FY 2014. The Board's request is equal to its request and enacted amount in FY 2012 and 2013, and reflects the Board's commitment to efficient and cost-effective budget management practices. The Board notes that its peer review activities are likely to increase in FY 2014 with the implementation by DOE of the Administration's recently announced Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste.

A detailed explanation of the Board's request by Object Class follows.

Object Class 11.0, Salaries: \$1,802,000

The estimate for this object class includes funding for 11 part-time Board members, Executive Schedule senior professional staff, and General Schedule support staff. The 11 part-time Board members are Special Government Employees and, in accordance with the Board's enabling legislation, each member is compensated at the rate of pay of Executive Schedule Level III for every day he or she is engaged in work for the Board. The senior professional staff members support the work of the 11 part-time Board members in evaluating the technical and scientific validity of DOE activities related to SNF and HLW management and disposal. The General Schedule staff members perform administrative activities related to the Board's ongoing technical and scientific evaluation and the operation of the organization. Such activities include budget preparation and financial management, dissemination of Board publications, information technology, management of meeting logistics, and preparation and implementation of Board responses to federal directives.

Object Class 12.0 Civilian Personnel Benefits: \$431,000

The estimate in this object class represents the government's contribution for employee benefits for staff and Board members.

Object Class 21.1 Travel and Transportation: \$288,000

The estimate in this object class includes travel costs for Board members, staff, and consultants who are required to travel to Board meetings, professional meetings, conferences, orientation activities, analog sites, national laboratories, and other events and venues related to accomplishing the Board's mission and performance goals. The amount estimated assumes that each of the 11 Board members will attend two Board meetings and an average of four miscellaneous meetings for approximately three days each during the year. The assumption is that the professional staff members will attend two Board meetings and two miscellaneous meetings during the year and that each trip will last approximately three days.

Object Class 23.0, Rental Payments to the General Services Administration (GSA): \$228,000

The estimate represents the amount that the Board will pay to the General Services Administration under its contract for rental of the Board's office space in Arlington, VA.

Object Class 23.3, Communication, Utilities, Miscellaneous: \$40,000

The estimate represents costs for long-distance and local telephone service, postage, local courier services, video teleconferencing, internet, and mailing services.

Object Class 24.0, Printing and Reproduction: \$60,000

The estimate is for costs associated with publication of Board reports that are required by statute to be sent to Congress and the Secretary of Energy at least two times per year, publication of additional reports and technical materials, and meeting notices in the *Federal Register*. The Board expects to publish at least two major reports in FY 2014. The estimate also includes the costs of producing and disseminating press releases and other information necessary for informing the public of the Board's activities. To reduce costs, the Board uses electronic publishing to the extent feasible. To comply with Board standards of quality and transparency established in 2001, physical copies of Board materials are sent to the public upon request.

Object Class 25.0 Consultants: \$64,000

The estimate includes funding for consultants to support and supplement Board and staff analyses of specific technical and scientific issues as authorized by Congress.

Object Class 25.1/2/4, Contractual Services - Other: \$298,000

The estimate for this object class includes: costs associated with accomplishing the Board's mission, including meeting-room rental and related services and court-reporting services; maintenance agreements for equipment rental; professional development for both supervisors and staff; and services from commercial sources. The Board contracts to supplement and support in-house operations, including IT support, Web site management, and report production and editing. The Board supports and complies with Administration initiatives, which include financial auditing in accordance with the Accountability of Tax Dollars Act. The Board supports the goals set forth in Executive Order 13514, "Federal Leadership in Environmental, Energy, and Economic Performance," and is committed to reducing its greenhouse gas emissions where practicable.

Object Class 25.3, Services from Other Government Agencies: \$79,000

The Board's enabling legislation authorizes the procurement of necessary administrative services from the General Services Administration (GSA) on a reimbursable basis. The estimate for this object class includes funding for administrative support services (payroll, accounting, personnel, etc.) provided by GSA, legal advice from GSA, security clearances through the Office of Personnel Management, and other miscellaneous interagency agreements.

Object Class 26.0, Supplies and Materials: \$60,000

This estimate includes anticipated expenses for office supplies, subscriptions, library materials, meeting supplies, and off-the-shelf technical reports and studies.

Object Class 31.0, Equipment: \$50,000

The estimate for this object class includes costs for purchase of miscellaneous equipment, including computer hardware, and upgrading computer software. The object class also includes the continuation of upgrades to IT security, continuity of operations (COOP), support of E-Gov telecommuting efforts, and technical support for the management of electronic records and e-mail.

The Nuclear Waste Technical Review Board Projected Fiscal Year 2014 Expenditures Object Classification

(in Thousand Dollars)

		Actual	Annualized FY13 CR*	Requested
Classification code 48-0500-0-271		FY 2012	FY 2013	FY 2014
	Expenditures			
11.0	Salaries	\$1,727	\$1,768	\$1,802
12.0	Civilian Personnel Benefits	436	426	431
21.1	Travel and Transportation	247	342	288
23.0	Rental Payments to GSA	208	206	228
23.3	Communication, Utilities, Misc.	58	36	40
24.0	Printing and Reproduction	6	38	60
25.0	Consultants	185	96	64
25.1/2/4 25.3	Contractual Services - Other Services from other Government	184	308	298
	Agencies	91	100	79
26.0	Supplies and Materials	36	41	60
31.0	Equipment	<u>50</u>	<u>39</u>	<u>50</u>
	Total	<u>\$3,228</u>	<u>\$3,400</u>	<u>\$3,400</u>

(Numbers may not add because of rounding)

^{*}NOTE: FY2013 amounts shown reflect P.L. 112-175 Continuing Resolution level annualized to a full year.

Identification Code 48-0500-0-1-271	Actual FY 2012	Requested FY 2013	Requested FY 2014
Total Number of Full-Time Permanent Positions	12	12	13
Total Compensable Work-years: Full-Time			
Equivalents	12	12	13