



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



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Mr. Ralph L. Phelps
Chairman
Northern New Mexico Citizens Advisory Board
1660 Old Pecos Trail, Suite B
Santa Fe, New Mexico 87505

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11/10/08

Dear Mr. Phelps:

The Department of Energy's Los Alamos Site Office has reviewed the Northern New Mexico Citizens Advisory Board recommendation 2008-01 – Recommendation to DOE and LANL to Expedite Planned Change Request for Shielded Containers. The Los Alamos Site Office response to this recommendation is provided in the attachment.

If you have any questions or concerns, you may contact Lee M. Bishop at (505) 606-1804, or myself at (505) 606-0197.

Sincerely,

George J. Ray
Manager

Environmental Projects Office

EPO-15/C-002

cc:
L. Bishop, EPO, LASO
E. Worth, EPO, LASO
J. Casalina, EPO, LASO
Records Center, LASO
Official Contract File, LASO

ATTACHMENT

Recommendation No. 2003-01 by Waste Management Committee -

Recommendation to DOE and LANL to Expedite Planned Change Request for Shielded Containers

Recommendation

The NNMCAAB recommends that:

DOE provide strong support and encouragement to EPA to expedite the approval process for allowing the shielded containers for handling and disposing RH TRU wastes at WIPP, since it may expedite removal of TRU waste from LANL Area G with no significant impact on the performance of the repository.

If above issues have already been addressed in other documents or references, the NNMCAAB recommends that for clarity and completeness, they be either summarized and added to the Change Request or specifically referenced where appropriate.

Intent

The intent of this recommendation is to encourage DOE to provide strong support for using shielded containers for removal of RH TRU waste, so that the TRU wastes from the LANL Area G can be removed on schedule.

Effect

The effect of using shielded containers to transform RH TRU containers into CH TRU containers will greatly increase the efficiency for removal, transport and disposition of the TRU.

Response

This recommendation is correct. Using shielded containers to manage and ship Remote Handled TRU (RH TRU) Waste to WIPP by allowing them to be handled as Contact Handled TRU (CH TRU) can greatly increase the efficiency for removal, transport, and disposition of RH TRU wastes. The LASO EM program can use this NNMCAAB recommendation to bolster its position in using lead shielding for radioactive RH waste management activities when working with disposal sites and regulators including the EPA.

In October 2006 the New Mexico Environment Department (NMED) issued the Department of Energy's Waste Isolation Pilot Plant (WIPP) a revised hazardous waste facility permit that enabled WIPP to receive remote handled (RH) Transuranic (TRU) wastes. Previously in 2000, the Nuclear Regulatory Commission certified a sturdy, lead

lined cask (RH-72B) for transport of RH TRU wastes to WIPP. RH TRU wastes shipped in the shielded RH-72B casks presents the same external low radiation levels as the contact-handled TRU waste shipments. This shipping cask provides for safe, efficient disposal of RH TRU wastes.

Currently, LANL works directly with disposal facilities on their ability to receive lead shielded containers as non-hazardous waste with the understanding that the lead is present for the sole purpose of shielding. LANL also employs various shielding techniques to handle RH TRU waste by utilizing temporary shielding, overpacks, canisters, and casks that in many cases utilize lead as the primary shielding component.

The most recent example of utilizing lead shielding was on April 16, 2009, when DOE received approval from the NMED to commence shipping of 16 Remote-Handled Transuranic (RH-TRU) canisters stored in vertical shafts at LANL Area G.

On June 2nd, after an extensive readiness review, shipping commenced. On July 2nd, the shipping campaign was completed, with no injuries or off-normal events.

The shipping casks used were DOT-approved RH-72B casks. Due to the lead shielding and impact limiters on the casks, as well as a long record of successful loading and shipping by the WIPP team, the shipments were completed efficiently and safely.

The EPA is carefully considering the use of shielded canisters and DOE supports this. In October 2008, WIPP submitted two documents to support this use.

A plan is currently being formed regarding the disposition of the remainder of the RH-TRU waste being stored at Area G. The plan is to protect on site workers, environment and public during retrieval, repackaging and shipping through use of temporary shielding, packaging (e.g. containers), and shipping casks to reduce potential exposures to higher radiation levels. DOE will update the CAR as this plan progresses.