

## ENVIRONMENTAL MANAGEMENT SITE-SPECIFIC ADVISORY BOARD

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Mr. James M. Owendoff  
Acting Assistant Secretary for Environmental Management  
U.S. Department of Energy, EM-1  
1000 Independence Avenue, SW  
Washington, DC 20585

Dear Mr. Owendoff:

### **Background**

A key component to successfully reducing risks to human health and the environment from legacy Transuranic Waste (TRU) located throughout the DOE-EM Complex is the ability to achieve final disposition in the Waste Isolation Pilot Plant (WIPP), located near Carlsbad, New Mexico. With the re-licensing of the WIPP site, we now see the extension of its operation for decades into the future. We champion the potential for expansion of the retrieve/treat/dispose efforts of the TRU program.

In past years, as individual sites queued up for removal, treatment and disposal of their respective TRU inventories, we saw a bottleneck in WIPP operations and TRU remediation efforts due to current capacity limits at WIPP for temporarily staging TRU drums in above ground, surface storage.

Maintenance shutdowns, lack of proximity of DOE-EM sites to the WIPP facility and inclement weather disrupting transportation all have impacted the efficiency of the WIPP program to meet its mandates. Concurrently, at individual sites, we have seen the extension of mortgage costs as sites package and then wait for shipping and disposition. In fact, multiple sites currently have a backlog of drums ready for shipment.

The EM SSAB Chairs believe that DOE's submittal of a modification to its Class 3 Hazardous Waste Disposal Permit with the New Mexico Department (NMED), proposing the construction of an above-ground storage facility at the WIPP site has the potential to be the right answer for addressing the current inefficiencies in operations.

The above ground storage facility proposed by WIPP has the potential to make the TRU waste disposal process more efficient. The permit modification submitted to the NMED contains a quite detailed description of this proposed addition to the WIPP facility. It is a fairly straightforward construction project and there is little reason to doubt, that if constructed to the proposed specifications, it would be capable of temporarily storing a large quantity of TRU waste. However, the permit modification provides no information on the cost of this facility, or the expected benefits to be derived from either in terms of the more efficient operation of the WIPP facility, or the reduction in risk around the DOE complex from the more efficient operations of WIPP and the TRU waste disposal process.

**Recommendation**

1) The EM SSAB recommends seeking further efficiencies in the WIPP TRU program in order to streamline, expand and accelerate TRU waste disposition.

2) The EM SSAB recommends that DOE prepare for public review, information on the expected benefits and costs of this proposed addition to the WIPP facility in terms of more efficient operation of WIPP, an overall reduction of risk around the DOE complex from an increased rate of disposal of TRU waste, and the impact of the cost of this facility on other DOE facilities. Allowing nearly a one-year buffer of TRU waste inventory to be safely stored above ground at WIPP for a period of up to one year, seems to makes sense.



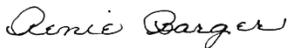
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cc: David Borak, EM-4.32