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LANL TA-3 (TA-55)

September 18, 1997

Dean Triebel  
U.S. Department of Energy  
Los Alamos Area Office  
528 35th Street  
MS-A316  
Los Alamos, N.M. 87544

RECEIVED

SEP 19 1997

DOE OVERSIGHT BUREAU

Dear Mr. Triebel:

**RE: PREDECISIONAL DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PARALLEL PROJECT FUEL MANUFACTURE AND SHIPMENT; LOS ALAMOS NATIONAL LABORATORY, LOS ALAMOS, NEW MEXICO; PREPARED BY U.S. DEPARTMENT OF ENERGY, LOS ALAMOS AREA OFFICE; AUGUST 18, 1997**

The following transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Predecisional Draft Environmental Assessment (PDEA).

1. Page 5, Section 2.1: TA-3 is highlighted in Figure 1, however, there is no mention of TA-3 in the text. What is the purpose of TA-3 and why is it highlighted?
2. Page 23, Section 3.3.2: The sentence in this section reads, "Responsibility for each shipment would transfer from the US government to the Canadian Government at the border." How would this be accomplished?
3. Page 3, Section 4.1.2: The paragraph states, "HEPA filters are regularly replaced...." How often is "regularly"? Do the HEPA filters undergo testing to meet certain requirements?
4. Page 3, Section 4.1.2: The U.S. Department of Energy (DOE) must meet requirements of 40 CFR 61, Subpart H, specifically Section 61.93.
5. 20NMAC2.72.200.E requires that "applications for permits shall be filed prior to the commencement of the construction, modification or installation. Regardless of the anticipated commencement date, no construction, modification or installation shall begin prior to issuance of the permit." There is no mention of whether or not this facility has been included in the current air quality permit for Los Alamos National Laboratory (LANL). If it has not, then it must be included in the permit before commencement of construction.
6. It should be noted that the proposed shipments include relatively small amounts of Mox Fuel: a total of 59.2 pounds will be shipped to Canada over the life of this project. The text in Section



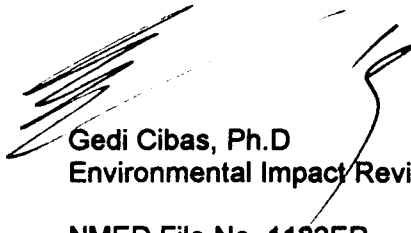
Dean Triebel  
September 18, 1997  
Page 2

2.1.2. states that a "Type A" package will be used for shipping Mox fuel. This package appears substantially similar to a 55-gallon drum with top and bottom thermal shields and interior packing. The text explains that this type of container is typically used for "relatively low-level radioactive materials." DOE's Los Alamos Office should explain the rationale behind this choice. Mox fuel contains significant quantities of plutonium and uranium and should therefore require more protective packaging.

That many citizens in our State have been sensitized to such issues by the prospect of radioactive waste shipments to the Waste Isolation Pilot Plant (WIPP) should provide ample reason for caution in this case. The comparison is apt to be made between the Mox fuel shipments and the planned WIPP shipments. In the case of WIPP shipments the wastes are planned to include, among other radionuclides, plutonium and uranium isotopes at much lower levels than in the Mox shipments. The type A drums of TRU waste comprising WIPP shipments will be transported in Trupact II containers that have been subjected to extremely rigorous tests. DOE should also explain its proposed use of commercial trucks in shipping this material.

We appreciate the opportunity to comment on this document. Please let us know if you have any questions.

Sincerely,



Gedi Cibas, Ph.D  
Environmental Impact Review Coordinator

NMED File No. 1122ER