



State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
P.O. Box 1663, MS/J-993
Los Alamos, New Mexico 87545

GARY E. JOHNSON
GOVERNOR

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September 22, 1997

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LANL TA-3 (TA-53)

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Mat Johansen, DOE AIP POC
U. S. Department of Energy
Los Alamos Area Office, MS A316
528 35th Street
Los Alamos, New Mexico 87544

RE: AIP Comments on the August 18, 1997 Predecisional Draft, "Environmental Assessment for the ParalleX Project Fuel Manufacture and Shipment"

Dear Mr. Johansen:

The DOE Oversight Bureau (DOE OB) has reviewed the subject document. The attached comments are provided for the purpose of communicating the results of the review. They are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department.

As a result of our review, we are recommending that DOE reconsider the type of containerization and the method of shipment for Mox fuels. Nuclear reactor fuel pellets do not appear to qualify as "relatively low level radioactive materials."

If there are any questions, please contact Bruce Swanton, DOE Oversight Bureau, at (505) 827-1536.

Sincerely,

Stephen Janicak

Steve Janicak, LANL POC
Department of Energy Oversight Bureau

SY:bas

Attachment

cc w/o attachment:
J. Parker, NMED, Chief, DOE OB

cc w/attachment:

- B. Garcia, NMED, Chief, HRMB
- T. Taylor, DOE, Program Manager, EM/ER, MS A316
- B. Koch, DOE FUI FPC, MS A316
- J. Jansen, LANL, Project Manager, EM/ER, MS M992
- J. Canepa, LANL, Deputy Project Manager, EM/ER, MS M992

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Refer to NMED File No. 1122 ER
New Mexico Environment Department
DOE Oversight Bureau Comments on the
Parallex Project Fuel Manufacture and Shipment: PDEA
Request for comment dated August 28, 1997

General comment:

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.

Specific comment:

Section 2.1.2. The text states that a "Type A" package will be used for shipping the Mox fuel. This package appears substantially similar to a 55-gal 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 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 the 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.