An Approach to Solving the Small Quantity Site TRU Waste Problem

May 16, 2000

Accelerate Disposal

SQS Initiative

Clean Up 18 Sites
WIPP has received waste from three of the large generator sites. Expansion of waste shipments from large quantity sites to WIPP is scheduled.

<table>
<thead>
<tr>
<th>Site</th>
<th>Audit Date</th>
<th>Projected Certification Date</th>
<th>Projected Shipping Date</th>
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<tbody>
<tr>
<td>RFETS</td>
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<td>Hanford</td>
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<td>INEEL</td>
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<td>LANL</td>
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<td>SRS</td>
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<td>ORNL</td>
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...3% of TRU waste is at 18 small quantity sites (SQS) in 12 states...

...And it must be characterized for transport/disposal.

California   New York
Illinois     Ohio
Iowa         New Mexico
Kentucky     Pennsylvania
Missouri     Tennessee
Nevada       Virginia

NM-2
The Problem: the enormous amount of time and cost of preparing SQS TRU Waste for disposal
... Meaning that the waste would remain at these sites and in these states for years, rather than being where it should be ... WIPP.
A Potential Solution: 1) Mobile characterization at SQS for transportation; 2) ship to WIPP for disposal characterization; and 3) address special case waste at DOE facilities.
The Approach...

SQS - Mobile Characterization for Transport

WIPP - Disposal characterization for most SQS contact-handled TRU waste

DOE Sites – Disposal characterization for special case SQS waste
The benefits of waste characterization at WIPP...

- Makes it easier for NMED to oversee the process.
- Protects the public and the environment by accelerating removal of the waste to a safer place.
- Reduces the overall environmental impact by reducing the number of characterization facilities required.
- Fingerprinting
  Reduces costs, meaning that state and federal resources can be redirected to meet other environmental needs.
- Facilitate communication between NMED and DOE/CAO.
Accelerated waste removal ...
Reduced risk, by shipping once, in most instances...
Instead of twice.
This is a proposed approach. The path forward is:

- Work with NMED to identify potential regulatory issues
- Work with stakeholders to identify potential public concerns
- Generator Sites to refine inventory

Decision
Permit modifications...

Storage capacity increase of no more than 25%.

Add state-specific waste codes

Temporary authorization

Non-Destructive Assay

Headspace Gas Sampling

Real Time Radiography

Visual Examination

On-site characterization using currently allowed processes and techniques
Options for managing items not permissible at WIPP...

- Return to generating site.
- Transport to alternate storage and/or disposal facility.

Modify permit to allow acceptance and treatment.
## Proposed Schedule

<table>
<thead>
<tr>
<th>Event</th>
<th>June</th>
<th>July</th>
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<th>September</th>
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<tbody>
<tr>
<td>Submit permit modification</td>
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- Submitted permit modification: June
- Construction commencement: July
- Waste acceptance for trial testing: August
- Audit approval: September-
- Waste receipt: November-December
At this point, the SQS Initiative appears to make sense for the sites, the host and transportation corridor states, and the nation.

- Facilitates NMED oversight of process
- Beneficial to human health and the environment
- Positive economic impact on New Mexico, while reducing national cost