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RECEIVED



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SECRETARY

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April 6, 2001

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Dr. Ines Triay  
Manager, Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, New Mexico 88221

Dear Dr. Triay:

Thank you for the opportunity to visit with you on March 23, 2001, to discuss the National TRU Program Business Plan. The purpose of this letter is to provide feedback to you on the document as well as to identify key elements which we will be addressing with you regarding the WIPP facility in the near future.

First, I would like to thank you for the opportunity to review the referenced documents. By carefully demonstrating how the WIPP facility is integrated with the national TRU complex, I am left with a better appreciation for the vision and "end-points" the Department of Energy (DOE) has in mind for this facility.

Comments for each section are contained below:

National TRU Waste Program Vision (p.2)

No comment.

Where We Are (p. 3)

The first two elements contained herein reflect the DOE's position and the Environment Department does not necessarily concur.

We agree that a performance-based waste analysis plan should be a priority. We believe that such a plan must remain specific and enforceable. We acknowledge that having a plan that is less prescriptive could be achieved while maintaining compliance with performance standards and usability requirements criteria (i.e. DQO's).

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Shipping Schedule for CH Waste (p.4)

I fail to understand the basis for the underperformance of the "Status Quo" shipping rate on the chart. Does DOE have data to support this scenario?

Visualization of Waste Flow (p. 4 & 6)

No comment.

Consequence of Audit Driven Approach (p. 7)

No comment.

End State (p. 8)

Many of these proposed "end states" require reduction/relaxation of standards currently imposed by the permit, and will involve significant public input and dialog. The NMED cannot predetermine the "approvability" of these types of modifications via the high performance team approach.

Optimized CH and RH Waste Flow (p 9 & 10)

Inherent in achieving this optimized state is the assumption that the waste is well known (i.e., "AK Standardized" is a euphemism for knowing the waste completely and not having to dig very deep to obtain all the necessary information). From our experience on audits, this may prove challenging for the DOE to achieve.

Roadline (p. 11)

This is useful information, particularly regarding the timing and classification of modifications. I encourage the DOE to share this information with stakeholders and periodically update it, as appropriate.

Draft Certification Roadline (p. 12)

No comment.

How Do We Get There? (p. 13)

No comment.

Proposed Approach (p. 14)

In our March 23, 2001, meeting we agreed to the following composition for a Senior Management Council.

- Senior Management Council
  - Pete Maggiore , NMED Secretary
  - Paul Ritzma, NMED Deputy Secretary
  - Ines Triay, SBFO Manager
  - Kerry Watson, SBFO Deputy Manager
  - Hank Herrera, Westinghouse General Manager

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rather than create a specific mid-level management council or high-performance teams at this point, we agreed to create an initial single committee to discuss alternative significant issues and barriers to implementation. This letter, when accompanied with the March 23, 2001, National TRU Program Business Plan should form the Charter for this committee.

Representatives from the NMED to this Committee should be:

- Mr. James Bearzi, Chief, Hazardous Waste Bureau
- Mr. John Kieling, Manager

Please advise us of your selection of DOE-appointed staff, at your earliest convenience.

Finally, in order to better facilitate an understanding of NMED activities and performance, I proposed to develop the performance metrics for the following categories:

- A) Financial/Procurement
- B) Staffing (number, caseload, compensation, turnover)
- C) Auditing (inventory/timelines)
- D) Permit modifications (~~auditing~~/timelines)  
inventory

We propose to begin compiling this data immediately with the goal of providing quarterly updates for review at Senior Management meetings.

Again, thank you for the opportunity to comment on the National TRU Program Business Plan. I look forward to working with you regarding the State of New Mexico. Hopefully, our respective leadership will result in a successful April 20th meeting with our staff.

Sincerely,



PETE MAGGIORE

Cabinet Secretary