

**Subject:** FW: info. from DOE for 5/31 conf call

**Date:** Thu, 31 May 2001 15:05:12 -0600

**From:** greg\_lewis <greg\_lewis@nmenv.state.nm.us>

**Organization:** NMED

**To:** "Steve Zappe (E-mail)" <steve\_zappe@zeus.nmenv.state.nm.us>

-----Original Message-----

From: Beauchesne, Ann [SMTP:ABeauchesne@NGA.ORG]

Sent: Thursday, May 31, 2001 9:07 AM

To: Brown, Ethan; Bill Ross; Brian Monson; Dan Miller; David Wilson; Gordon Appel; Graham Mitchell; Greg Lewis; Jack Spath; Jerry Boese; Joan Sowinski; John Owsley; John Swartout; John Walker; Kathleen Trever; Keith Collinsworth; Max Power; Mike Grainey; Mary Lou Blazek; Mike Wilson; Paul Liebedorfer; Randy McDowell; Roger Mulder; Roger Murphy; Shelley Sherritt; Steve Tarlton; Tom Winston; Tuss Taylor

Cc: Doug Frost; Martha Crosland

Subject: info. from DOE for 5/31 conf call

Below is a schedule sent by DOE for discussion on today's conference call at 2:00 (EDT). Also, you may wish to refer to Lynne Wade's presentation from our April task force meeting.

You can link to Lynn's presentation on the NGA website at <http://www.nga.org/cda/files/FFTFLYNNE2.ppt> or by opening the attached PowerPoint presentation below

<<Lynn.ppt>>

Remote Handled TRU Schedule for Disposal at WIPP

Activity  
Schedule

Review of RH WAP/WAC & Facility Modification by NAS  
Ongoing

Submittal of documentation to RSI for 45-day review  
June 9, 2001

(DOE/NM/EEG Sponsored)

RSI Review of RH Documentation begins in Carlsbad



0105435

Submit RH WAP/WAC Permit Modification to EPA & NMED  
September 15, 2001

Facility ORR Begins  
End of CY 2001


Target Date for RH Operations  
January 2003


OR TRU Project Draft Storage Schedule

Begin design activities for storage bunkers  
June 2002

Begin RH TRU processing  
January 2003

New storage bunker(s) available  
July 2003

 Lynn.ppt  
**Name:** Lynn.ppt  
**Type:** Microsoft PowerPoint Show (application/vnd.ms-powerpoint)  
**Encoding:** base64

  
ENTERED



# Remote-Handled Transuranic Waste Disposition Discussion

## Meeting of the National Governors' Association

April 12, 2001

U. S. Department of Energy

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## Topics To Be Discussed

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- Definition of RH TRU Waste
- Volume of RH TRU at DOE sites
- Regulatory strategy for disposal of RH TRU at the Waste Isolation Pilot Plant (WIPP)
- Requirements and considerations for approval
- RH shipping casks
- Small Quantity Sites (SQS) strategy
- Current schedule



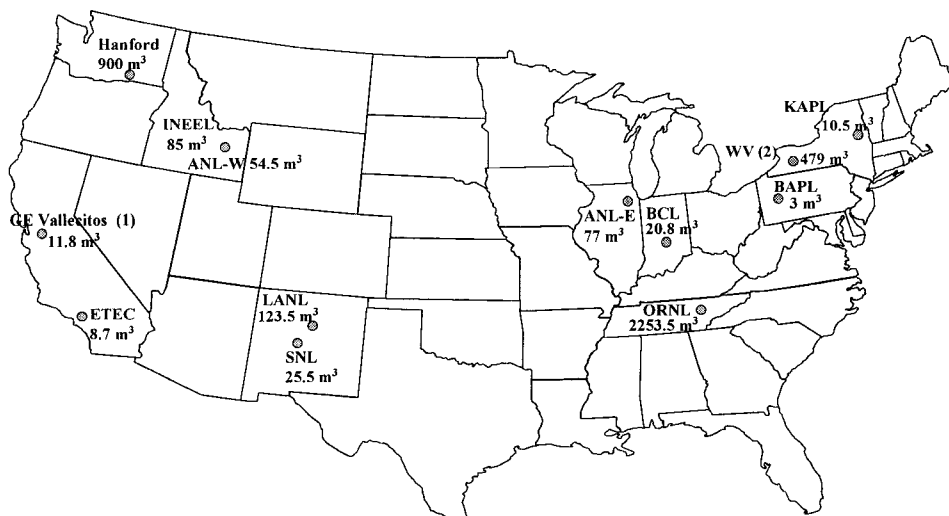
# Definition of RH TRU Waste

- TRU waste is waste containing more than 100 nanocuries of alpha-emitting transuranic isotopes per gram with half-lives greater than 20 years
- RH TRU waste has an outer surface dose rate of greater than 200 millirem per hour
- Homogeneous solids, debris, soil, and gravel

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## Volume of RH TRU at DOE Sites (Stored and Projected)



Source: *The National TRU Waste Management Plan, Revision 2 (December 2000)*

(1) Waste may not be of defense origin; compliance with LWA requirement will need to be demonstrated prior to disposal at WIPP.

(2) Waste is commercial and does not meet the LWA requirement for disposal at WIPP.

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## **Regulatory Strategy for Disposal of RH TRU at WIPP**

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- Characterization program to be proposed to the Environmental Protection Agency (EPA) and New Mexico Environment Department (NMED) is performance-based, responsive to:
  - ALARA requirements
  - Joint EPA/NRC guidance
  - NAS recommendations
- “Acceptable Knowledge” is the focus of the program, where available, to meet Compliance Certification, Land Withdrawal Act and RCRA requirements
- This strategy may require EPA rule-making and NMED Class 3 permit hearings

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## **Requirements and Considerations for EPA and NMED Regulatory Approval**

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- DOE to submit RH characterization program to EPA that meets WIPP Land Withdrawal Act and 40 CFR 191/194 requirements, and EPA approves via 40 CFR 194.8 process
- New Mexico Environment Department must approve modification to the WIPP Hazardous Waste Facility Permit
- DOE to submit to NMED:
  - RH Facility Modification Request
  - RH Waste Analysis Plan
- NMED issues draft and final permit allowing RH TRU waste storage and disposal

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# **Requirements and Considerations for EPA and NMED Regulatory Approval (cont.)**

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- Informally discussed draft RH TRU characterization process document and supporting position papers with EPA, March 14, 2001
- Two permit modification requests to be submitted to NMED, summer of 2001
- Independent review of performance-based approach by NAS or outside organization is expected