



Subject: DOE's August 2 letter

Date: Fri, 03 Aug 2001 15:42:44 -0600

From: Don Hancock <sricon@earthlink.net>

To: James_Bearzi@nmenv.state.nm.us

James,

It should be clear that you can't rely on what DOE tells you about the INEEL situation.

For example, their August 2 letter "corrects" several errors in their July 18 letter. The dates that the 60-day storage limit expire have changed for three of the shipments. The July 18 letter mentioned "events that my interrupt normal waste handling activities," leading to the clear inference that an "off-normal event" had occurred. Your July 27 response quoted language of the permit related to "off-normal events." So now, DOE denies that there is or has been any "off-normal event." If what's occurred, including the suspension of shipments from INEEL for 12 days, isn't an "off-normal event," I'm concerned about "normal" events.

In essence, DOE is withdrawing everything it asked for in its July 18 letter and much of what it stated as fact.

However, the new dates that they are using for the 60-day time limit for INEEL shipment IN0100095 do not correspond to the information in the WWIS that Steve Zappe had provided me. The WWIS has the same July 9 receipt date for shipments 95, 96, and 97. So some of the information in the August 2 letter is also suspect.

SRIC and Nuclear Watch twice have suggested to NMED (letters of July 13 and 23) that you should not rely on what DOE is saying about the INEEL situation. SRIC wants to reiterate that point, as we believe that DOE's letters of July 18 and August 2 provide further confirmation for our concerns. Thus, SRIC reiterates the requests for action by NMED that we have stated in those two previous letters.

Further, we believe that it is highly likely that DOE is violating container storage limits of Module II.A.1.b of the permit, since they can have only six TRUPACT loads in the Waste Handling Building (WHB) (four in TRUPACTS in the TRUDOCK and two loads on facility pallets in the NE Storage Area), since the remainder of the storage capacity is taken up by the INEEL wastes. Virtually every day six TRUPACTs are arriving at WIPP and yesterday there were supposed to be seven arriving, a similiar situation is on the schedule for next week. While DOE could "stage" TRUPACTs in the Parking Area to avoid violating the WHB limits, they may well not be doing that when they continue to rush to unload TRUPACTs in order to get them back to storage sites in order to get more waste to WIPP.

Thus, in addition to our previous requests for action, SRIC suggests that NMED have an unannounced inspection of the WHB on a day that several shipments are arriving to determine whether it is operating in compliance with the permit.

Thanks for your consideration. I'd be pleased to discuss these matters further with you.

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