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January 28, 2002

Dr. Inés Triay
Department of Energy
PO Box 3090
Carlsbad, NM 88221

VIA FAX and U.S. Mail

Dear Dr. Triay:

Southwest Research and Information Center (SRIC) has continuing concerns about the accuracy and adequacy of the WIPP Waste Information System (WWIS). Many of the problems have persisted for many months and have been raised with DOE and New Mexico Environment Department (NMED) officials. At a meeting that SRIC and other citizen groups had with NMED on January 10, it was suggested that we put our concerns in writing. This letter will identify specific problems that we believe should be resolved immediately and also request an opportunity to meet with you or your staff to discuss additional changes in the WWIS.

As you well know, the WWIS system is the key information source to DOE, NMED, and the public regarding waste that is destined for or is at WIPP. Thus, the information must be timely and accurate for WIPP to operate safely and for regulators and the public to have confidence that there is reliable information about WIPP's operation and safety. Therefore, SRIC views any inaccuracies and inadequacies with the system as being very serious. These concerns are increased when problems persist for months and are not resolved. The fact that the public does not have direct access to the WWIS is also a continuing concern to SRIC, as there is no direct way for the public to obtain important information about waste at WIPP.

There are also regulatory requirements for the WWIS under both the NMED permit and the EPA certification. For example, the WIPP Hazardous Waste Facility permit requires that the WWIS provide Shipment Summary Reports that "will contain the container IDs of every container in the shipment." B-4b(1)(i). The WWIS currently does not always provide that information.

A recent example of that deficiency is INEEL's shipment number IN010177. In the Shipment Summary Report drum IDR741202896 is not included, even though your CAR No. 02-034 of January 14, 2002 states that drum was on the shipment. Instead, the Shipment Summary Report includes container DUNN002, which was not shipped to WIPP on that shipment. The Waste Container Data Report for that drum shows no Shipment Num., Packaging Num., or Assembly ID, yet the report shows that the drum is "Emplaced at WIPP" and gives a disposal location.



Another inaccuracy, apparently caused by inadequate quality assurance, is that the Shipment Summary Reports for IN020007 and IN020008 show certification dates of "01/05/2001," which we believe is an error of one year.

Since at least September 2001, the WWIS Repository Report has not been complete and accurate, apparently as a result of the drum that did not meet WIPP acceptance requirements that was shipped from INEEL, and was overpacked. Thus, the Report shows emplacement of an 85-gallon drum overpack (and now two overpacks), but does not include those overpacks as coming from any site. Further, the containers summary table does not correctly show the number of drums actually emplaced at WIPP.

The WWIS also does not generate consistent, accurate radionuclide information. Specifically, the repository panel/room activity levels do not always match the total activity levels shown for the waste shipped for each site, and the discrepancies are much larger than those that could result from rounding.

While some of these problems may be more serious than others, we believe that specific inaccuracies should be corrected immediately, and systemic problems should be addressed to prevent their recurrence. SRIC is also concerned that there are likely to be other problems with the WWIS that we cannot identify because of the lack of direct access. Moreover, given DOE's plans to increase the rate of waste receipt, likely generation of derived waste, tracking requirements for the Centralized Characterization Facility which would require major changes in the WWIS, the current inaccuracies with the WWIS are likely to be substantially compounded in the future.

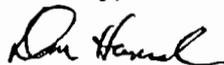
SRIC also believes that there are waste-related and operational characteristics of WIPP that should be included in the WWIS. One way to incorporate such improvements could be the electronic data management permit modification that DOE is developing. Such changes should be discussed with stakeholders before the modification is submitted.

Because of the importance of accurate information and the key role of the WWIS as the source of such data, SRIC also strongly believes that DOE should provide some public, read-only access to the WWIS. We would like to discuss some ideas in that regard with you and your staff.

We appreciate your immediate attention to these matters. We would also request copies of any Corrective Action Requests (CARs) any root cause analysis done regarding the WWIS.

As always, you and your staff should feel free to contact us about these or other matters.

Sincerely,



Don Hancock

cc: Steve Zappe, NMED
Scott Monroe, EPA