



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

ENTERED

October 10, 2002

Mr. Steve Zappe
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505



Dear Mr. Zappe:

Endorsement of Remote Handled Transuranic Waste Permit Modification Request

The Department of Energy (DOE) is seeking authorization to ship remote-handled transuranic (RH-TRU) waste to the Waste Isolation Pilot Plant (WIPP) as part of DOE's effort to accelerate the disposition of legacy waste. To obtain authorization to ship mixed RH-TRU waste, DOE has submitted a request for a Class 3 modification to the WIPP Resource Conservation and Recovery Act (RCRA) permit. The Oak Ridge Site Specific Advisory Board (ORSSAB) would like to take this opportunity to comment on the proposed Class 3 permit modification request for the WIPP.

Oak Ridge has the largest percentage of the 3,800 cubic meters of defense related RH-TRU waste in the DOE complex. Oak Ridge also has relatively high annual rainfall levels and shallow, inter-connected aquifers, making it an unsuitable location for the indefinite storage and disposal of RH-TRU wastes; therefore, the ORSSAB has a vested interest in the acceptance by the New Mexico Environment Department (NMED) of this permit modification request. If approved, the RCRA permit modification would allow the management, storage, and disposal of mixed RH-TRU waste at WIPP. We offer these comments in support of the proposed request:

- ✍ RH-TRU waste constitutes only 14% of the total curie activity in DOE's TRU inventory, and the effects of the radionuclides (greater than 20 year half-life) associated with this waste are two orders of magnitude lower than that in the contact-handled transuranic (CH-TRU) waste.
- ✍ The preliminary assessment analyses show that the characteristics of RH-TRU waste will have a negligible impact on the potential long-term release of radionuclides into the environment.
- ✍ The Land Withdrawal Act of 1992 allows the disposal in WIPP of up to 175,564 cubic meters of TRU waste, including 7,080 cubic meters of RH-TRU waste. The estimated inventory of RH-TRU waste in the DOE complex is well below this level, and final disposal volumes will be further reduced by treatment.
- ✍ DOE's proposed RH-TRU waste characterization plan is performance based and includes the acceptable knowledge process, visual examination, radiography, and characterization at time of packaging. Use of these tools, in combination when appropriate, will ensure that WIPP waste



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- ☞ acceptance criteria will be met and items indicating presence of hazardous constituents or prohibited items of concern to safe management of the RH-TRU waste will be identified.
- ☞ The RH-TRU wastes from Oak Ridge will all be characterized and repackaged in a specially designed processing facility. The wastes processed in this facility should meet or exceed the waste acceptance criteria proposed in the Class 3 RCRA permit modification request.

DOE's crosscutting approach of accelerated legacy waste disposition will result in reduced risk to the public and the environment. It is ORSSAB's hope that NMED will accept this permit modification request and allow shipment of RH-TRU waste to the WIPP.

The ORSSAB is a volunteer citizens' panel composed of up to 20 members, chosen to reflect the diversity of gender, race, occupation, and interests of persons living near the Oak Ridge Reservation (ORR). Non-voting members include representatives from the Department of Energy - Oak Ridge Operations Office, the U.S. Environmental Protection Agency - Region 4, and the Tennessee Department of Environment and Conservation. These members advise the Board on their respective agency's policies and views. In addition, the Board has two non-voting high school student representatives.

The ORSSAB is dedicated to provide advice and recommendations to the DOE on its ORR Environmental Management program regarding environmental restoration, waste management, stewardship, and economic development of specified areas. Recommendations concerning health and safety, environmental justice, and other topics may be included as the Board determines appropriate. The Board is also committed to serving as a communication link between the public and relevant government agencies. The group was formed and chartered under the Federal Advisory Committee Act in 1995.

We are pleased to have this opportunity to provide input and look forward to learning how our comments will be addressed in action on the RH-TRU waste permit modification request.

Sincerely,



David N. Mosby, Chair

cc: Gerald Boyd, DOE-ORO
Martha Crosland, DOE-HQ
Pat Halsey, DOE-ORO
Connie Jones, EPA
John Owsley, TDEC
Gary Riner, DOE-ORO
WIPP Program, Office of Radiation and Indoor Air