ENTERED

Subject: FW: My Final Word-Smithing
From: "Taylor, Theodore" <ttaylor@doeal.gov>
Date: Tue, 4 Feb 2003 06:24:40 -0700
To: "'bearzi'" <james_bearzi@nmenv.state.nm.us>, "'zappe'" <steve_zappe@nmenv.state.nm.us>
CC: "'brannon'" <james.brannon@jacobs.com>, "Taylor, Theodore" <ttaylor@doeal.gov>, "Crosland, Martha (HQ)" <Martha.Crosland@em.doe.gov>, "Nunz, James" <jnunz@doeal.gov>, "Orban, James E." <jorban@doeal.gov>, "Vozella, Joseph" <jvozella@doeal.gov>, "Erickson, Ralph E." <rerickson@doeal.gov>, "Martinez, E. Dennis" <dmartinez@doeal.gov>

James and Steve, I apologize for leaving you off this distribution list. Attached are the draft recommendations from the SSAB TRU waste workshop, together with a draft transmittal letter.

I am very pleased that Steve could attend the workshop. He and the other representatives of the regulatory community provided invaluable insights throughout the plenary and breakout sessions.

Ted
-----Original Message-----
From: Taylor, Theodore
Sent: Tuesday, February 04, 2003 6:21 AM
To: Nunz, James; Orban, James E.; Triay, Ines (CBFO); Sahd, Gregory (CBFO); Vozella, Joseph; Crosland, Martha (HQ); Dowd, Frederick (HQ); 'ramsey'
Cc: Erickson, Ralph E.; Martinez, E. Dennis; Taylor, Theodore; Manzanares, Menice S.; 'brannon'; 'gale'; 'jordan'
Subject: FW: My Final Word-Smithing

To All,

Attached are the draft final recommendations, together with the draft transmittal letter, from the SSAB TRU waste workshop, held on Jan. 31-Feb. 1, 2003. The workshop was co-sponsored by the Northern New Mexico Citizens' Advisory Board and DOE's Carlsbad Field Office. I am sending this material to you for your information.

Jim Brannon, NNMCAB Chair, prepared the documents, based on a transcript of the recommendations, as they were approved on Feb. 1 by representatives of the SSABs. Each SSAB will now consider the recommendations at their next respective Board meeting. At the Mar. 27-29, 2003 meeting of the SSAB Chairs, the recommendations, if approved by the individual SSABs, will be considered for final approval. Generally, recommendations made at SSAB workshops, if approved by the individual SSABs, are voted "up" or "down" by the SSAB Chairs, without change.

I believe the recommendations as written accurately state the decisions of the workshop attendees.

I believe the workshop was a success. I want to thank Dr. Ines Triay and her staff at CBFO, for attending all sessions of the workshop and providing much valuable information and advice, and Greg Sahd of CBFO and Jessica Hogue of Washington TRU Solutions for their dedication and skill in arranging the tour, handling the registration and reception, providing the outstanding food (we all gained weight!), and in making other arrangements. I also want to thank Martha Crosland for supporting this SSAB activity and for her leadership. Finally, I want to thank Jim Brannon, Richard Gale, Menice Manzanares, Grace Roybal, Ray Lopez, and Ed Roybal for their excellent work.

Ted
DDFO
-----Original Message-----
From: Brannon, James [mailto:James.Brannon%jacobs.com@internet.al.gov]
Sent: Monday, February 03, 2003 5:02 PM
To: Taylor, Theodore

030207

Cc: Manzanares, Menice S.; 'ventrtek@zianet.com'; 'frdrx@newmexico.com'
Subject: My Final Word-Smithing

Ted,

The cover letter and recommendations are attached. If you have no heartburn or objections, I am prepared to shoot them to all concerned for the local CABs to evaluate. Jim <<ffastlog.txt>> <<TRU Waste Recommendations-A.doc>> <<Roberson-TRU Waste Cover Ltr.doc>>

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Ms. Jessie H. Roberson,
Assistant Secretary for Environmental Management
U.S. Department of Energy (DOE)
1000 Independence Avenue, SW
Washington, D.C. 20585

Environmental Management Site-Specific Advisory Boards

Dear Ms. Roberson:

On January 31 and February 1, 2003 all nine Environmental Management (EM) Site-Specific Advisory Boards (SSAB) met in Carlsbad, New Mexico to conduct a conference on transuranic (TRU) waste management. A daylong briefing and tour of the Waste Isolation Pilot Plant (WIPP) preceded the conference. Enclosed for your consideration are the recommendations approved at the conference and subsequently adopted by each of the SSABs. We request that you consider these recommendations and provide us a response within 30 days receipt of this letter.

One hundred five people attended the first plenary session. Dr. Inés Triay, Manager of DOE's Carlsbad Field Office (CBFO) and her staff attended all sessions and provided excellent support. DOE managers from Albuquerque and Los Alamos also provided support. Patrice Bubar and Alton Harris of your staff provided an overview of the National TRU Waste Management Plan. Representatives from regulatory agencies in New Mexico, South Carolina, and Washington also attended the workshop.

We conducted core-topic breakout sessions covering: regulatory and outreach, including issues related to WIPP certification, state permitting, and stakeholder involvement; transportation, including issues related to trucks and shipping containers, shipping and receiving, and emergency preparedness and response; waste characterization, including issues related to characterization, treatment, and packaging; and management, including issues related to the National TRU Waste Program strategy, the Performance Management Plan (PMP), priorities and scheduling, and costs. The thirteen enclosed recommendations were developed in the breakout sessions. The conferees approved them in plenary session February 1.

Sincerely,

Chair, Fernald CAB	Chair, Hanford Advisory Board
Chair, INEEL CAB	Chair, Nevada Test Site CAB
Chair, Northern New Mexico CAB	Chair, Oak Ridge Site Specific Advisory Board
Chair, Paducah CAB	Chair, Rocky Flats CAB
Chair, Savannah River Site CAB	

cc w/ enclosure:

Patrice Bubar, Associate Deputy Assistant Secretary for Environmental Management, EM-20, DOE
Dr. Inés Triay, Manager, CBFO

_____, Acting Designated Federal Officer, EM-11, DOE
Fred Dowd, Public Participation Specialist, EM-11, DOE-HQ/FORS

DOE Site Managers and SSAB DDFOs:

Steve McCracken, Site Manager, DOE Fernald EM Project
Gary Stegner, Fernald CAB DDFO, Fernald EM Project
Keith Klein, Site Manager, Hanford Site, DOE Richland Operations Office
Wade Ballard, DDFO, Hanford Advisory Board, Hanford Site, DOE Richland Operations Office
Harry Boston, Manager, DOE Office of River Protection
Steve Wiegman, DOE Office of River Protection
Warren Bergholz, Acting Site Manager, DOE Idaho Operations Office
Gerald Bowman, DDFO, INEEL CAB, DOE Idaho Operations Office
Ralph Erickson, Site Manager, DOE Los Alamos Site Office
Theodore J. Taylor, DDFO, NNMCAB, DOE Office of Los Alamos Site Operations
Kathy Carlson, Site Manager, DOE Nevada Test Site
Carl Gertz, DDFO, NTS CAB, DOE Nevada Test Site
Michael Holland, Acting Site Manage, DOE Oak Ridge Operations Office
Gerald Boyd, DDFO, ORSSAB, DOE Oak Ridge Operations Office
Don Seaborg, Site Manager and DDFO, DOE Paducah Gaseous Diffusion Plant and PGDP CAB
Barbara Mazurowski, Site Manager, DOE RFETS, Rocky Flats Field Office
Jeremy Karpatkin, DDFO, RFCAB, DOE RFETS, Rocky Flats Field Office
Greg Rudy, Site Manager, DOE Savannah River Site
Thomas Heenan, DDFO, SRS CAB, DOE Savannah River Site

DOE EM Site-Specific Advisory Boards (SSAB):

Fernald CAB, Jim Bierer, Chair
Hanford Advisory Board, Todd Martin, Chair
Idaho National Engineering & Environmental Laboratory Citizens Advisory Board, Monte Wilson, Chair
Northern New Mexico Citizens' Advisory Board, James R. Brannon, Chair
NTS Community Advisory Board, Phil Claire, Chair
Oak Ridge Site Specific Advisory Board, Luther V. Gibson, Chair
Paducah Gaseous Diffusion Plant Citizens Advisory Board, J. Merryman Kemp, Chair
Rocky Flats Citizens Advisory Board, Jeff Eggleston, Chair
Savannah River Site Citizens Advisory Board, Wade Waters, Chair

New Mexico State Regulatory Staff

Ron Curry, Secretary, New Mexico State Environment Department
Charles Lundstrom, Water and Waste Management Division
James P. Bearzi, Chief, Hazardous Materials Bureau
Steve Zappe, RCRA Permits Management Program

Recommendations to the Department of Energy on
Transuranic (TRU) Waste Management
By
Environmental Management's Site Specific Advisory Boards

The cost of characterization of transuranic (TRU) waste is too high, particularly at small quantity sites. The cost of confirmation of TRU waste is too high, especially at large quantity sites.

THEREFORE, we recommend that the Department of Energy (DOE) characterize TRU waste as required to reduce risk and minimize transportation and handling of the waste, while making the confirmation process cost effective. [1]

The receiving capacity of the Waste Isolation Pilot Plant (WIPP) is not always sustained.

THEREFORE, to meet site-specific needs, we recommend that the DOE allocate and coordinate resources complex-wide to optimize shipping to match the receiving capacity of WIPP. [2]

Some requirements affecting the TRU waste management program are overly prescriptive, are hazardous to worker safety, do not contribute to public safety, and are also negatively impacting schedules and costs. These requirements were developed without the experience the National TRU Waste Management Program now possesses.

THEREFORE, we recommend that the DOE, in concert with stakeholders and regulators, initiate an ongoing program to identify, correct, and revise those requirements that interfere with the safe, prompt and cost effective management of TRU waste. [3]

There are potential TRU wastes for which volumes and disposition paths are not yet identified, including but not limited to: (a) pre-1970 TRU waste, (b) non-defense TRU waste, (c) sodium bearing TRU waste, (d) Hanford tank TRU waste, and (e) TRU waste without an identified disposal path. These TRU wastes may cumulatively exceed the authorized capacity of WIPP.

THEREFORE, we recommend that the DOE identify volumes and disposition pathways for all potential TRU waste streams; and further, [4]

We recommend that DOE, in consultation with stakeholders and regulators, initiate action to assure that WIPP has the capacity to accommodate all of the above listed TRU wastes, as necessary. [5]

There is TRU waste for which containers are not currently available or planned.

THEREFORE, we recommend that the DOE accelerate TRU waste container design, licensing and deployment. [6]

At present, the regulatory framework requires one hundred percent confirmation of TRU waste process knowledge.

THEREFORE, we recommend that the DOE streamline TRU waste management by accepting demonstrated process knowledge for TRU waste characterization; and further, [7]

We recommend that the DOE, in consultation with stakeholders and regulators, reexamine the categorization of TRU waste using a risk-based approach; and further, [8]

We recommend that the DOE identify the inventory of orphan TRU waste and assign a corporate project team to develop a path forward. [9]

Ninety-five percent of the TRU waste is at five sites, and the remaining five percent is at more than twenty sites. The small sites have limited capacity (i.e., time, personnel, and funding) to characterize and obtain WIPP certification for disposal. The ability to ship from small sites to major sites involves less rigorous characterization than WIPP acceptance criteria. Some major sites will have the personnel and facilities to characterize the waste to WIPP at less risk and for less money.

THEREFORE, we recommend that the DOE evaluate the concept of one or more locations to characterize TRU waste for WIPP disposal; and further, [10]

We recommend that the DOE finish its analyses and make a decision with adequate public involvement regarding where to characterize TRU waste for disposal. [11]

The following issues impede accelerated cleanup: (a) oversized boxes have no available containers or method of transport without size reduction; and, (b) high-activity waste has no available container without requiring repackaging and increased risk to personnel.

THEREFORE, we recommend that the DOE expedite design, certification, and fabrication of appropriate containers (e.g., ARROW-PAK and TRUPACT III), and accelerate the adoption of rail transport, as appropriate. [12]

There is a continuing public concern about shipping radioactive TRU waste, which impacts states' approaches to permitting and inspection.

THEREFORE, we recommend that the DOE revitalize its efforts in coordinating transportation issues with states and Indian Tribes and assist in updating and disseminating information to the public about transportation risks and safety and provide public participation opportunities on transportation issues. [13]

Approved: March XX, 2003