

Subject: SRS Trip Report

From: Stone.Nick@epamail.epa.gov

Date: Wed, 05 Mar 2003 14:42:03 -0600

To: james_bearzi@nmenv.state.nm.us, steve_zappe@nmenv.state.nm.us



Attached is my trip report from the National Academy of Sciences meeting at the Savannah River Site, regarding transuranic waste characterization. No immediate action is required. EPA and NMED will continue to monitor DOE's efforts with third party reviews for potential permit modifications. If you have any questions, please call on me.

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(See attached file: SRS trip report.wpd)



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3/10/2003 10:53 AM

Meeting Augusta, Georgia
March 3-4, 2003
National Academy of Sciences

**Optimizing the Characterization and Transportation of Transuranic Waste Destined for
the Waste Isolation Pilot Plant**

Background

I attended this meeting to provide technical expertise on regulatory requirements under the Land Withdrawal Act (LWA) and the Resource Conservation and Recovery Act (RCRA).

DOE provided speakers that characterized the WIPP operation as too complex and over regulated. Specific issues were raised with the Waste Acceptance Criteria, modification procedures under RCRA, and the audit process for generator sites.

DOE explained to me in private that they intend to use the National Academy of Sciences document to justify radical changes in the waste characterization process. DOE believes:

1. Minimal Acceptable Knowledge (AK) must be defined so generators can stop searching waste data after adequate AK is achieved.
2. Head Space Gas Analysis should be removed from the Waste Characterization process.
3. Visual Examination is unnecessary.
4. Radiography and Non-Destructive Assay should be limited to a small sample of each waste stream.
5. Measurement of radionuclide concentrations should be discontinued in favor of total Curie count from AK data.
6. The audit process to approve generator sites for waste shipment to WIPP must be streamlined and simplified.

Recommendations

No response is required from this third party review. If DOE references this review as part of a regulatory action, then EPA (or NMED) will respond based on applicable regulations.

The permit/approval notice requirements that DOE wants to change are taken from the applications DOE supplied NMED and EPA. Both regulators welcome modification proposals with adequate documentation from DOE.