



State of New Mexico
ENVIRONMENT DEPARTMENT

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WIPP file - Red 9

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March 6, 1995

George Dials, Manager
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221

Dear Mr. Dials:

Subject: RH-TRU Implementation Plan

The New Mexico Environment Department has reviewed the RH-TRU Implementation Plan submitted by your Office dated January 31, 1995. As stated in the plan, the scope and objectives are derived from the Land Withdrawal Act, (LWA) which requires that a study be conducted on RH-TRU waste. While the Department considers the development of an RH-TRU implementation plan as necessary and perhaps even overdue, the document submitted is much too limited in scope to be considered an implementation plan. It appears instead to simply serve as a plan to satisfy the requirement under the Land Withdrawal Act of conducting a study of RH-TRU waste. Comments which follow are grouped as either general or specific depending upon their scope.

General Comments:

It is not clear how the RH-TRU Implementation Plan (IP) fits into other WIPP planning documents. Where will issues regarding waste characterization, handling and transportation be addressed? Nor is it clear in the IP how DOE intends to address regulatory requirements. Will there be a separate No Migration Petition, 191 Certification application and RCRA Part B application for RH-TRU? The "Project Schedule" provided on page 7 of the Plan calls for the completion of a RH "Strategy" in March 1995. This Strategy purportedly will address operational aspects such as characterization and transportation. What appears to be missing is a strategic planning document which encompasses all issues involved with emplacing RH-TRU waste in the repository.

General confusion exists throughout the IP between the terms Performance Assessment (PA) and System Prioritization Method (SPM). These terms are used interchangeably, yet represent different programs with distinct objectives. PA should refer to the computer codes which calculate the response of the repository to various conditions over time or the subsequent document which describes the results. SPM should be reserved for discussions dealing with implementing the "what-if" aspects of various scenarios in the PA

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codes and the subsequent evaluation of results in a decision matrix. The IP erroneously refers to "SPM codes" when it means PA codes.

The definition of "performance assessment" (40 CFR §191.12) includes an analysis that both (1) identifies the processes and events that might affect the disposal system, and (2) examines the effects of these processes and events on the performance of the disposal system. The LWA does not specify a particular time frame for performance assessment, making it unwise to limit any analysis for this IP to only long-term impact.

Nowhere in this IP is the timing of RH-TRU relative to CH-TRU emplacement discussed. This will be a major issue if RH-TRU will be unavailable for delivery and emplacement until after several panels have already been filled with CH-TRU waste and sealed up. Rather than simply assume the two will be emplaced ideally (RH in the walls first, followed by CH stacked in the rooms), consider operational aspects as they are most likely to occur.

Specific Comments:

- 1) Page 1, second paragraph - Provide a reference for the System Prioritization Method. Not everyone may be familiar with it, and DOE/Sandia needs some documentation to describe this process.
- 2) Page 2, second paragraph - Clarify the assumptions used in modeling the impact of RH-TRU waste on the Performance Assessment. Is the impact determined by modeling the repository filled with only RH-TRU waste (an unrealistic scenario), or by analyzing the difference between filling it with only CH-TRU waste versus CH + RH-TRU waste? The modeling should account for possible synergistic effects between the two waste forms.
- 3) Page 2, number 1 - The RH-TRU Waste Technical Baseline Report by IT Corporation is referenced inadequately. A list of references should also be provided.
- 4) Page 2, number 2 - Before identifying significant RH-TRU waste parameters for PA, mustn't the other study (comparison of RH versus CH characteristics) have been completed? The initial assumption that the only difference between them is "the RH fission product inventory and associated beta/gamma radiation" (from page 1) may not prove true after the differences have been thoroughly studied. Please clarify the timing and

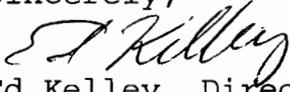
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relationship between these two requirements under Section 6(c)(2)(B) of the LWA.

- 5) Page 2, number 4 - Replace "Sandia will run the SPM code..." with "The SPM team will run the PA code...", unless the additional decision analysis code is used. If it is, please clarify.
- 6) Page 3, number 2 - Flammability and explosiveness issues should not be eliminated from consideration simply because the current Waste Acceptance Criteria (WAC) addresses them. Flammable and explosive gases may be produced after the waste is emplaced.
- 7) Page 3, number 3 - The IP should not be restricted to long term impacts.
- 8) Page 4, paragraph B - Replace SPM with PA.
- 9) Page 4, second from last paragraph - Provide the actual name for Sandia's Department 6348. For consistency, provide the department numbers for those described on the following page.
- 10) Page 5, first and third paragraphs - Unless it is necessary to retain it, replace SPM with PA in these paragraphs.
- 11) Page 6, "RH Strategy" - In view of comment 7 above, it may not be wise to assert "...the RH performance assessment project is concerned with long term impacts..." Operational phase strategies may be very important to adequately address the near-term performance assessment.

Thank you for the opportunity to comment on this document. As stated previously there are numerous issues regarding RH-TRU which are yet to be addressed. NMED would like the opportunity to provide input throughout the process of developing a program to characterize, transport and emplace RH-TRU waste at WIPP. Should you wish to discuss these comments please contact Mr. Benito Garcia at (505) 827-4358.

Sincerely,



Ed Kelley, Director
Water and Waste Management Division

cc: Benito Garcia
WIPP File