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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

May 19, 1997

MEMORANDUM FOR: G. W. Cunningham, Technical Director

COPIES: Board Members
S. Krahn

FROM: D. Winters

SUBJECT: Carlsbad Area Office (CAO) TRU Waste Characterization and Certification Audit of LANL Readiness to Ship TRU Waste to WIPP

This report documents observations made by Defense Nuclear Facilities Safety Board (Board) staff members D. Winters and D. Ralston during a May 12-16, 1997, trip to the Los Alamos National Laboratory (LANL) to observe a Characterization and Certification Audit conducted by the Department of Energy's (DOE's) Carlsbad Area Office (CAO). The primary objective of the trip was to determine whether the CAO audit process is of sufficient rigor to verify the adequacy of storage/generator site preparedness to ship transuranic (TRU) waste to the Waste Isolation Pilot Plant (WIPP) for disposal. The secondary objective was to ascertain whether LANL's preparedness to ship is adequate.

DOE plans to receive the first shipment of TRU waste for disposal at WIPP in May 1998. The Operational Readiness Reviews of the contractor, Westinghouse Waste Isolation Division (WID), and the DOE/CAO are expected in January and March 1998, respectively. The CAO is currently conducting "Characterization and Certification Audits" of those TRU storage/generator sites expected to provide the earliest waste shipments (i.e., Idaho National Engineering and Environmental Laboratory [INEEL], LANL, Rocky Flats Environmental Technology Site [RFETS]). A preliminary review of the current version of the WIPP Safety Analysis Report (SAR) (Rev. 1, March 1997) indicates that, although there are no apparent significant safety risks to the public, *there are potential risks to individual site workers* from various postulated credible accidents resulting in the release of respirable TRU contamination. The significance of these accidents could be greater than analyzed in the SAR should the waste received at WIPP exceed the limits provided in the WIPP Waste Acceptance Criteria (WAC). Because WIPP relies primarily on storage/generator site documentation to establish waste package contents, it is imperative that both the CAO audit of the storage/generator site waste handling, packaging, and shipping process, and the site processes themselves, be rigorous enough to ensure that WIPP WAC limits will not be exceeded.

The Board's staff observed the DOE/CAO audit of the LANL TRU waste program from Tuesday, May 13 through Thursday, May 15, 1997. The staff observed technical and quality assurance oriented reviews of documents and interviews of LANL TRU waste program staff.

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