

Date: Fri, 10 Sep 1999 14:07:19
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From: Don Hancock <sricon@earthlink.net>
Subject: IDC 300, Rev. 2
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September 10, 1999

TO: JAMES BEARZI

FROM: Don Hancock

RE: IDC 300, Rev. 2

James,

I understand from Steve Zappe that there has not been a response from DOE to your August 20, 1999 letter to Ines Triay.

Nonetheless, Bill Mackie at EMNR tells me that INEEL has scheduled two more shipments to WIPP this month, one on September 23 and another on September 30.

Since there is no information about such shipments on the WWIS, according to Steve, does NMED even know that those shipments are IDC 300 wastes?

As your August 20 letter noted, it's unclear how many drums DOE believes are covered by Nonhazardous Waste Determination, Rev. 2. Presumably, DOE will say that it covers up to 1,100 drums -- probably 30 - 40 shipments.

SRIC believes that NMED should inform DOE in writing that it has not approved further shipments from INEEL and that a complete and adequate response to the August 20 NMED is necessary, and that such a response should be provided before DOE schedules further shipments from INEEL.

In addition, SRIC would reiterate a few of the concerns in our August 13, 1999 memo regarding IDC 300, Rev. 2. First, DOE has not provided an adequate response regarding the likely presence of beryllium powder in at least some containers of IDC 300 wastes. Second, INEEL is relying in part on visual examination of 35 drums between 1983 and 1999 (page 10). There is no basis to believe that such VE is reliable. Since CAO did not certify INEEL until 1998, many of the drums were not subject even to a DOE-approved VE program and process. Moreover, DOE's own audit of INEEL's performance during 1998-1999 found several portions of the characterization program to be inadequate, including acceptable knowledge, headspace gas sampling, and visual examination.



Again, SRIC strongly urges you to inform DOE that it needs to respond completely to the August 20 letter and that in the meantime it should not ship additional wastes to WIPP from INEEL.

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