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**SOUTHWEST RESEARCH AND INFORMATION CENTER**

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November 17, 1999

Dr. Inés Triay  
Carlsbad Area Office  
PO Box 3090  
Carlsbad, NM 88221

VIA FAX (505) 887-1855 and U.S. Mail

Dear Dr. Triay:

The WIPP Waste Information System (WWIS) is the key electronic database to track characterization, certification, shipment, emplacement information regarding wastes coming to and located at WIPP. As such, it is essential for DOE, regulators, and the public that the WWIS be complete and accurate. Moreover, the WWIS must fully meet requirements specified in the WIPP RCRA Permit "prior to the acceptance of TRU mixed waste." (Permit condition II.C.1.g.)

Despite the fact that WIPP has been receiving wastes for almost eight months, it is clear that the WWIS is not operating as required. Under the circumstances, SRIC requests that you conduct a full-scale investigation of the WWIS to correct errors immediately. No further shipments of wastes to WIPP should be approved, nor should any site be providing additional data to the WWIS until the investigation is completed, corrections are made, and new procedures are in place to ensure that the WWIS is complete and accurate and that it functioning correctly.

SRIC does not know the full extent of the problems with the WWIS, because we and the public have no direct access to the system. However, from the very limited materials that we have from the WWIS, there are some obvious problems. Given these easily identifiable problems, we are concerned that many more problems exist. Such problems can only be identified and corrected with a full-scale investigation.

The WWIS Repository Report generated by NMED today (copy attached) indicates (on page 2 of 6) that there are 16 dunnage 55-gallon drums and 574 55-gallon pipe overpack drums emplaced at WIPP. However, the containers by site information (pages 3 through 5) do not show corresponding numbers. Rather than 574 overpack drums emplaced, page 5 under "specific container information" shows that there are 546 drums emplaced -- there are 28 "lost" drums. Under the "container status totals" on the same page, there are 572 emplaced containers (representing 26 55-gallon drums and 546 overpack drums); again there are 28 "lost" drums.

Page 5 also shows that there are 11 dunnage 55-gallon drums emplaced, not the 16 shown on page 2. To further confuse matters, the "specific container information" also shows 14 dunnage 55-gallon drums, but those drums are not reflected on the "container status totals" on that page.



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These are serious problems that should not occur if the WWIS is being operated and maintained properly. SRIC is concerned that additional vital information may be missing and inaccurate in the WWIS. For example, are the thousands of curies of radioactive materials in those 28 drums also "lost"?

SRIC asks that you take immediate action, and provide a report on what actions you are taking and what the results are to appropriate regulatory agencies and the public.

Please feel to contact me, if you need further information. SRIC can also provide suggestions for how to improve the aspects of the WWIS, including readability, information presentation, and other matters.

We look forward to your response.

Sincerely,



Don Hancock

cc: Steve Zappe, NMED (w/o attachment)

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