

Environmental Management Site-Specific Advisory Board

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Northern New Mexico
Oak Ridge

Paducah
Rocky Flats
Savannah River

December 7, 2005

Mr. James Rispoli,
Assistant Secretary for Environmental Management
U.S. Department of Energy
Washington, DC 20585

Dear Mr. Rispoli:

The Environmental Management (EM) Site-Specific Advisory Board (SSAB) Chairs continued to discuss DOE's waste disposition challenges at our recent meeting in Idaho Falls. The Chairs commend DOE for its renewed efforts toward more integrated, credible disposition strategies. In addition, the Chairs thank DOE for the personal attention and openness from the EM staff (Frank Marcinowski, Christine Gelles, Doug Frost, and Melissa Nielson), pertaining to the development of these disposition strategies and the best methods for our participation. The Chairs also wish to acknowledge the responses (see references) to our recent suggestions to the Secretary and Mr. Golan. This memorandum is meant to address the specifics of your suggestions.

In our continuing effort to further DOE's cleanup campaign, and in response to past DOE correspondence, the Chairs offer the following recommendations and commitments:

The EM SSAB Chairs and the Site-Specific Boards wish to take a strong leadership role in facilitating public involvement and comment during the development of the national Waste Management disposition strategies. We especially wish to assist in securing public comment and input from stakeholders regarding the disposition strategies for low-level (LLW) and mixed low-level waste (MLLW). To this end, when the draft strategy is available in March 2006, the Chairs hope to participate in workshops or other appropriate mechanisms to solicit comment on the draft strategy.

The EM SSAB Chairs would also like to offer our support (and comment when solicited) to the New Mexico Environment Department (NMED) regarding the WIPP permit modification for remote-handled transuranic (RH-TRU) waste. Provided the permit modification meets the standards established by the NMED and is fully compliant with regulatory requirements, the EM SSAB Chairs intend to solicit our respective Board's approval to support the permit modification with direct comment to the NMED. Any Board making such a supportive comment to NMED would provide a copy to your office.

Several sites throughout the DOE complex are grappling with unanswered questions related to high-level waste (HLW) disposition. Although not all the SSABs can address this issue specifically since it does not fall within their charter (e.g., the Nevada Test Site Citizen's Advisory Board), as a body the EM SSAB Chairs urge the DOE to continue to address this issue for those sites who have a stake in the outcome.

The eight other EM SSAB Chairs also believe that they can assist the DOE by providing some support for the pending Environmental Protection Agency standards being adjudicated for a federal high-level waste repository that will provide a final disposition for those sites that have high-level waste (HLW) streams. These eight EM SSAB Chairs desire to encourage a positive regulatory climate for environmental standards which impact HLW disposition.

Finally, the EM SSAB Chairs wish to express their concern regarding pre-1970 TRU waste¹ that remains an open question at many sites. We observe that no consistent national policy exists regarding retrieval and/or characterization of these buried wastes. Many are concerned that a significant volume of buried pre-1970 TRU waste that perhaps should be disposed of at WIPP will remain a site hazard in perpetuity. The EM SSAB Chairs would like to participate with DOE in the development of a national policy addressing pre-1970 TRU wastes and their proper disposition.

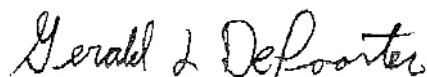
The EM SSAB Chairs sincerely appreciate the opportunity to regularly gather to consider cross-cutting national issues and other site interdependencies. We hope these recommendations and our demonstrated commitment to public involvement and meaningful advice will prove useful to you as we move forward together in this vital endeavor. We appreciate your consideration of our concerns and look forward to your written response and suggestions.



Kerry Trammell, Chair
Oak Ridge Site-Specific Advisory Board



Chad A. Kerley, Chair
Paducah Gaseous Diffusion Plant Citizen's Advisory Board



Gerald DePoorter, Chair
Rocky Flats Citizen's Advisory Board



Charles A. Phillips, Chair
Community Advisory Board for the
Nevada Test Site Programs



Jean M. Sulc, Chair
Savannah River Site Citizen's Advisory Board



James R. Brannon, Chair
Northern New Mexico Citizen's Advisory Board

cc: Charlie E. Anderson Doug Frost
 Christine Gelles Paul Golan
 Frank Marcinowski Melissa Nielson
 Ines Triay

References:

- a. DOE Memo, July 22, 2005, Charles Anderson; reply to EM-SSAB Chairs' memo to Secretary Bodman (June 22, 2005; Sulc recommendations regarding EM transfers to Legacy Management.
- b. DOE Memo, June 6, 2005, Charles Anderson; reply to Jean Sulc's transmittal memo for the EM SSAB Chairs, May 9, 2005; Subject: National Stakeholder Workshop on Waste Disposition.
- c. DOE Memo, April 22, 2005, Paul Golan; reply to EM SSAB Chairs' memo to Mr. Golan, November 30, 2004; Subject: National Stakeholder Forum on Waste Disposition.

¹ Post 1970 alpha waste was reclassified in 1970 as transuranic waste.