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## Savannah River Site

# CITIZENS ADVISORY BOARD

A U.S. Department of Energy Site-Specific Advisory Board

September 8, 2005

Dr. Ines Triay, Chief Operating Officer, EM  
U. S. Department of Energy  
Office of Environmental Management  
1000 Independence Ave SW  
Washington, DC 20585

Subject: Battelle West Jefferson Site TRU Waste Shipments to SRS

Dear Dr. Triay :

It has come to the attention of the Waste Management (WM) Committee of the Savannah River Site (SRS) Citizens Advisory Board (CAB) that the closure activities at the Battelle Waste Jefferson Site near Columbus, Ohio (BC) will require approximately 37 cubic meters of transuranic (TRU) waste to be dispositioned. Some of this waste is expected to be "remote" handled TRU waste (RH-TRU). DOE is contractually responsible for disposal of this waste by the end of CY 05 (December 30, 2005). This waste needs final packaging and disposal certification at a site with necessary handling capabilities for this type of material before final disposal at the Waste Isolation Pilot Plant (WIPP). Originally, DOE had planned to utilize the Hanford site for this activity but due to the state of Washington's initiative 297 (i.e., no shipments into Hanford) SRS is now being considered as a potential receiving site.

The SRS CAB is a non-partisan group of individual stakeholders from South Carolina and Georgia. Chartered under the Federal Advisory Committee Act, the Board provides informed and timely recommendations on waste management, environmental restoration, and other activities affecting SRS. The SRS CAB recently (July 26, 2005) adopted Recommendation #217, which was drafted by the WM Committee. This recommendation focused on the recent agreement to send additional TRU waste shipments from DOE Mound Closure Project (MCP) to SRS. In addition, the recommendation noted the SRS CAB support for consolidating and treating TRU waste at SRS provided that similar equity considerations to those associated to the MCP shipments are in place prior to receipt of any such waste at SRS.

As requested in the recommendation, DOE has unofficially notified the WM Committee of the possibility that this new TRU waste stream BC-TRU could come to SRS. Although the WM Committee would like to have more lead-time to think about any equity considerations, we appreciate DOE's effort to provide early identification of the potential shipments.

Before the WM Committee and the SRS CAB could support the receipt of the TRU waste from BC, DOE-HQ needs to provide SRS with several commitments. One commitment would be to ensure the necessary resources to accelerate the deployment and certification of the characterization system for large containers/boxes by the end of FY06.

Another commitment would be to assure no further schedule slippage associated with the SRS TRU Pad #1 excavation, which is currently expected to be about 1 year. In addition, DOE-HQ commitments are needed to ensure that a transportation packaging method to handle SRS high-activity TRU waste drums is available by FY07 (e.g. implementing the Arrowpak container or changing the transportation requirements are currently under consideration). Furthermore, DOE-HQ should make a commitment that the TRUPACT III is available for non-drummed by the end of FY07 and that the removal from SRS of all of the non-drummed TRU wastes occurs by the end of FY09 if at all possible, but in any case, no later than the end of FY10.

Currently, the New Mexico Environmental Department (NMED) prohibits RH-TRU waste from disposal at WIPP pending approval of a permit modification. This permit modification is being considered and the SRS CAB provided a letter in support of the authorization for RH-TRU waste in the WIPP permit on July 26, 2005. Since SRS only has a small quantity of RH-TRU, we also want assurances that any additional RH-TRU inventory be removed from SRS, either to WIPP or another site. Therefore and finally, we expect a commitment from WIPP that once the permit modification is received, a program for RH-TRU waste will be in place at WIPP and at SRS to ensure that RH-TRU waste is removed from SRS within two to three years of the permit modification. If this date can not be met, then all RH-TRU waste at SRS should be relocated to another DOE site by January 1, 2009 but in any case, no later than January 1, 2010.

In order to provide DOE-HQ with an early indication of the WM Committee's expectations, the Committee is submitting this letter as our position on the BC-Ohio TRU waste shipments. It is expected that an official recommendation will be forthcoming from the SRS CAB; however, the next meeting of the SRS CAB will not occur until September 27, 2005. Since we would like to see these commitments in-place as early as possible, we are providing them to you now for your consideration. If these commitments are not met, then it is unlikely that the SRS CAB can provide its full support. Please notify us of your intent to meet these commitments.

Sincerely,



Mr. Robert Meisenheimer  
WM Committee Chair  
46 Haul Way Road  
Hilton Head, SC 29928

cc: Frank Marcinowski, DOE-HQ  
Jeff Allison, DOE-SR  
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