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July 31, 2014

Ms. Kimberly Davis Lebak
Manager
Los Alamos Field Office
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Mr. Pete Maggiore
Assistant Manager for Environmental Operations
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Dear Ms. Lebak and Mr. Maggiore,

I am pleased to enclose Recommendation 2014-02, unanimously approved by the Northern New Mexico Citizens' Advisory Board at its July 30th meeting in Santa Fe.

Please call Lee Bishop, DDFO or Menice Santistevan, Executive Director, if you have questions regarding this recommendation. We look forward to the response from the Department of Energy.

Sincerely,

Carlos J. Valdez
Chair, NNM CAB

Enclosure: a/s
Cc w/encl:
U. S. Senator Tom Udall
U. S. Senator Martin Heinrich
U. S. Congressman Ben R. Lujan
Secretary Ryan Flynn, NMED
David Borak, DFO (via e-mail)
M. Lee Bishop, DDFO (via e-mail)
Christina Houston, DOE/EPO (via e-mail)
George Henckel, DOE/EPO (via e-mail)
Jeff Kendall, NMED
Rich Mayer, EPA
Jeffrey Mousseau (via e-mail)
Dean Hammonds, USACE (via e-mail)
Menice B. Santistevan, Executive Director NNM CAB

Darien Cabral, RCLC Executive Director (via e-mail)
Gil L. Vigil, Director Eight Northern Indian Pueblos
NNMCAB File

NORTHERN NEW MEXICO CITIZENS' ADVISORY BOARD
Recommendation to the Department of Energy
No. 2014-02
Institution of Measures to Help Ensure WIPP and LANL Transuranic
Disposal Operations Remain Continually Operational

Authored by: Douglas Sayre, Stephen Schmelling, and Carlos Valdez

Background

The Waste Isolation Pilot Plant (WIPP) has been operating since 1999 as the world's only underground repository for transuranic (TRU) waste disposal with relatively few operational glitches and no long-term shut downs until this year. The area's salt formation has proven stable and will encapsulate the TRU waste in salt deposits. This will ensure that the waste is sealed off from the surrounding environment safely and securely for the time necessary for the waste to lose most of its radioactivity.

Having the WIPP facility available for TRU waste disposal has been shown to be extremely important to the Department of Energy (DOE) particularly the Los Alamos National Laboratory (LANL), and other generator sites for past, current, and possible future waste disposition.

Observations and Comments

With the recent shutdown of the WIPP, the effects to conducting, continuing, and completing programs regarding the shipment of TRU waste from several of the generator sites, but especially LANL, has put obligatory actions to complete the shipment of all remaining above ground TRU waste by agreed to dates in jeopardy. The shutdown of the WIPP has left LANL with serious violations of regulatory agreements. Planning for future shipments of TRU waste to the WIPP is now on hold with no definitive time table of when shipments may be able to resume.

Recommendations

Due to the very serious problems that the shutdown of the WIPP has caused to LANL and the national shipments of TRU waste, the NNMCAB recommends that the following are considered as vital to WIPP operation:

- 1) DOE should enhanced/enhance/improve policy and procedures to help ensure that both WIPP and LANL do not get complacent with the EM cleanup and disposal.
- 2) DOE should provide enhanced/enhance/improve oversight and training at LANL and at other sites to ensure that employees of the TRU waste disposal program do not become complacent and lose sight of the very important objectives of the program.
- 3) DOE should enhanced/enhance/improve quality assurance/quality programs to adequately oversee TRU waste packaging and disposal operations.

- 1 4) DOE should enhanced/enhance/improve preventative, pre-scheduled maintenance programs on a
2 monthly or hourly basis for all equipment and machinery connected with the TRU waste disposal
3 program.

- 4 5) DOE should adhere to the greatest degree possible to the Conclusions (CON) and Judgments of Need
5 (JON) presented in the Phase 1 Accident Investigation Report on the Radiological Release Event at
6 WIPP.

7 **Intent**

8 It is the intent of the NNMCAB to assure that operations at DOE and LANL regarding the handling, transport, and
9 disposal of transuranic waste from LANL, as well as other generator sites to WIPP, establish policies and procedures
10 that will ensure safe and secure operations that prevent shutdowns of waste disposal operations for any extended
11 period.