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March 30, 2015

Ms. Christine Gelles  
Acting EM-LA Office Manager  
3747 West Jemez Road, MS A316  
Los Alamos, NM 87544

Dear Ms. Gelles,

I am pleased to enclose Recommendations 2015-01 and 2015-02, approved by the Northern New Mexico Citizens' Advisory Board at its March 11, 2015 Combined Committee meeting in Pojoaque, New Mexico.

Please call Lee Bishop, Co-DDFO, Michael Gardipe, Co-DDFO, or Menice Santistevan, Executive Director, if you have questions regarding these recommendations. We look forward to the response from the Department of Energy.

Sincerely,

Douglas M. Sayre  
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, Co-DDFO (via e-mail)  
Michael Gardipe, Co-DDFO (via e-mail)  
George Henckel, DOE/EPO (via e-mail)  
Jeff Kendall, NMED  
Rich Mayer, EPA  
Randy Erickson (via e-mail)  
Dean Hammonds, USACE (via e-mail)  
Menice B. Santistevan, Executive Director NNM CAB  
Andrea Romero, RCLC Executive Director (via e-mail)  
Gil L. Vigil, Director Eight Northern Indian Pueblos  
NNM CAB File

**NORTHERN NEW MEXICO CITIZENS' ADVISORY BOARD**  
**Recommendation to the Department of Energy**  
**No. 2015-01**

**Identification and Preparation of Interim Disposition Site(s) to Enable LANL Transuranic  
Disposal Operations and Nation's Other Sites' Waste Disposal Operations to Remain Continually  
Operational**

**Drafted by: Executive Committee Members**

**Background**

Several DOE sites, including the Los Alamos National laboratory (LANL), The Idaho National Laboratory (INL), the Hanford Site (ONNL), the Oak Ridge National Laboratory (ORNL), and the Savannah River Site (SRS) still have large quantities of transuranic waste (TRU) to that is not safely contained in long-term storage. The Waste Isolation Pilot Plant (WIPP) was created to safely and reliably dispose of this waste, and did so from 1999 to February 2014. Since the shutdown of WIPP in February 2014, no further reduction in the risk from TRU stored at DOE sites such as LANL has occurred, and the distributed risk from these sites continues.

**Comments and Observations**

With the recent shutdown of the WIPP, the DOE efforts to reduce distributed risk by completing programs for the safe disposal of TRU waste from across the national DOE complex have been jeopardized. For example, the shutdown of WIPP has rendered LANL unable to complete its commitments to the State of New Mexico for the removal of 3706 cubic meters of TRU waste that was stored above ground at TA-54. Planning for future shipments of TRU waste to the WIPP are now on hold with no definitive timetable of when shipments may be able to resume.

One of the most unfortunate aspects of the forced shutdown of WIPP is that DOE had no alternative for temporary or permanent storage of TRU waste other than to retain it at the sites where it was produced. WIPP was operated on the premise that it would be operated in such a way that accidents would not occur and that it would never be forced to shut down because of an accident. In light of the incidents that occurred in February 2014 this seems both unrealistic and unfortunate, and a poor model to follow for the future. Alternatives need to be evaluated and selected in a timely manner.

**Recommendation**

To restore public confidence in its ability to safely manage TRU waste, meet its commitments to its state regulators, and minimize the risk to the public from the massive amounts of waste it currently has on hand, the NNMCAB recommends that DOE:

1. Create and make available to the NNMCAB and the public a realistic plan and timetable to restore WIPP to full operation.
2. Identify and evaluate safe alternatives to retaining waste at its point of generation until WIPP is restored to full operation.
3. Put the best of these alternatives into operation to deal with the current situation, and to be prepared in the event of a similar situation arises in the future.

1 These actions need to be taken as soon as possible. To delay is to make a choice for distributing the risks  
2 associated with the temporary storage of nuclear waste at the generator sites around the nation, rather  
3 than being contained at a small number of sites such as Carlsbad, Andrews or other alternative sites.  
4 Identification of the alternatives should include a quantitative evaluation of the financial and risk  
5 benefits and costs of the alternatives  
6

7 **Intent**  
8

9 It is the intent of the NNMCAB to assure that operations at DOE and LANL regarding the safe handling,  
10 transport, and disposal of transuranic waste from LANL, as well as other generator sites to WIPP,  
11 accelerate and make more transparent, any activities in motion or planned, that will re-establish nuclear  
12 disposal pathways and destinations.