DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544

JUL 22 2010

Mr. Ralph L. Phelps
Chairman
Northern New Mexico Citizens Advisory Board
1660 Old Pecos Trail, Suite B
Santa Fe, New Mexico 87505

Dear Mr. Phelps:

Reference:
1.) Contract Number DE-AC52-06NA25396, Los Alamos National Security, LLC and the Department of Energy, National Nuclear Security Administration

Subject: Response to Northern New Mexico Citizens Advisory Board Recommendation 2010-01

The Department of Energy's (DOE) Los Alamos Site Office (LASO) has reviewed the Northern New Mexico Citizens' Advisory Board (NNMCAB) recommendation 2010-01. LASO's response to the recommendation is provided in the enclosure.

If you have any questions or concerns, you may contact M. L. Bishop at (505) 606-1804 or Ed Worth at (505) 606-0398.

Sincerely,

George J. Rael
Manager
Environmental Operations

EPO:15LB-120-266169

Enclosure

cc: w/enclosure
M.L. Bishop, LASO
E. Worth, LASO
M. Graham, LANS
Records Center, LASO
Official Contract File, LASO

ATTACHMENT

Recommendation No. 2010-01
By the Waste Management Committee

Recommendation for Disposition of Remote-handled Waste Buried in 33 Shafts at Technical Area 54 (TA-54)

Recommendations

Note: The 33 Shafts project is highly complex and requires cooperation between many agencies, organizations, and disciplines. EM must establish a needs breakdown structure and assign responsibilities and roles required to accomplish this project in a unified manner.
No. 1—Complete and implement the Sampling and Analysis Plan to determine the integrity of the inner and outer pipe wall by sampling the inner-outer annulus fill material.

No. 2—Assure sufficient funding is available for completion of the project within time limitations and all safety requirements.

No. 3—Assure the necessary technology, trained expertise, and infrastructure is available to implement any selected methodology.

No. 4—Based on the results of implementation of Recommendations No. l, 2, and 3, select an "ideal" or "non-ideal" methodology for disposition of the waste.

No. 5—Determine the non-acceptability/acceptability of time delays required for seeking and obtaining deviations, exceptions, and/or modifications from pertinent agencies for less extensive and more reasonable characterization and handling methodologies for highly radioactive RH-mixed wastes that have been "stable" for 20 to 30 years. Acceptance of more reasonable methodologies will result in great reductions in time, effort, expense, and radiation exposure to workers.

Response

Los Alamos Site Office agrees that this complex problem requires extensive cooperation and completion in a unified manner. These recommendations from the NNMCAB will assist us in determining the proper path forward.

While a number of the recommendations address issues or questions that are necessary to perform this project, LASO is not able to provide a response at this time.

The contractor and LASO project team continue to work with other DOE Sites (Hanford, Carlsbad Field Office, etc.) to evaluate technologies and approaches in executing this work. The 33 shafts is one of our most challenging projects and worker safety is very important due to the Remote Handling Component.

LASO wishes to especially thank the NNMCAB for the extensive research and historical data included in the recommendation. LASO believes this information will be very helpful as DOE evaluates options for a path forward.