

Department of Energy

Savannah River Operations Office P.O. Box A Aiken, South Carolina 29802 FEB 2 5 2004

Ms. Jean Sulc, Chair Savannah River Site Citizens Advisory Board 24 Harbor River Circle St. Helena Island, South Carolina 29920

Dear Ms. Sulc:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 182 – Waste Isolation Pilot Plant (WIPP) Permit New Mexico Environmental Department (NMED) Initiated Modification (Your letter, 01/28/04)

Thank you for your recommendation regarding the NMED permit modification. We encourage and appreciate the CAB's participation in the NMED public comment period on the proposed draft WIPP permit modification. The Department of Energy (DOE) is in agreement with the CAB and has provided comments to NMED on their proposed permit modification and has also requested a public hearing. DOE believes the proposed draft permit modification includes provisions that would hinder transuranic (TRU) waste disposal operations, is unnecessary and unduly burdensome, and would not result in increased benefits to human health or the environment.

On the CAB's Recommendation No. 4, DOE believes it would be premature to conduct any studies for alternative disposal options for any TRU waste that meets the WIPP waste acceptance criteria and is currently planned for WIPP disposal. In addition, some of the identified 5,775 cubic meters of TRU waste that is not identified in the 1995 Baseline Inventory Report (BIR) is currently being shipped to WIPP.

On the CAB's Recommendation No. 5, DOE has recently provided its latest TRU waste inventory to the DOE Carlsbad Field Office for inclusion in the latest WIPP baseline inventory report. That report will be submitted to the U.S. Environmental Protection Agency as part of the WIPP Compliance Re-certification Application in late March 2004. The Savannah River Site updated inventory includes the 5,775 cubic meters of recently generated TRU waste not included in the 1995 BIR, the Mound waste, and estimated future generated TRU waste.

If you have any questions or need additional information, please contact me or Charles Hansen, of my staff, at (803) 208-6072.

Sincerely,

Alym. al:

Jeffrey M. Allison Manager