



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802

NOV 15 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 198 – Savannah River Site (SRS) Transuranic (TRU) Waste Program Challenges (Your letter, 10/13/04)

Thank you for your recommendation regarding the SRS TRU waste program. It is important to have the CAB's support and commendation on SRS's success with accelerating TRU waste shipments to the Waste Isolation Pilot Plant (WIPP). The Department of Energy (DOE) will continue to aggressively pursue the removal of TRU waste at SRS and expects results for Fiscal Year (FY) 2005 to be similar to those achieved in FY 2004 but with more challenges. DOE will continue to brief the CAB on the progress of the TRU waste program and related matters that have a significant impact to our TRU program.

On Recommendation 198, the CAB identified six parts that I would like to address:

Part 1 requests that DOE provide SRS with enough TRU Package Transporter Model II (TRUPACT-II) shipping containers to ensure an average of 20 shipments per month.

DOE will be challenged for adequate shipping resources in FY 2005 based on the Idaho National Environmental Engineering Laboratory resuming WIPP shipments and the increased demand from other sites for shipments. Currently, SRS's shipping rate is three shipments per week through December 2004, with the expectation that shipments will increase in January 2005. It is too early to determine how many shipments SRS will make in FY 2005. If shipments curtail to the point SRS will not be able to complete the drum shipments in FY 2006, DOE will notify the CAB.

Part 2 suggests that DOE build new TRUPACT-II shipping containers and designate at least one to SRS to meet the 2008 target date for removal of all legacy TRU waste at SRS.

DOE recently investigated purchasing new TRUPACT-IIs to support the increased shipping demand in FY 2005. However, due to the cost of fabricating TRUPACT-IIs and their long fabrication schedule, DOE elected to not purchase additional containers. DOE notes the current projections show beyond FY 2005 the demand for TRUPACT-IIs will decrease to a level supported by the current TRUPACT-II inventory.

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Part 3 recommends that DOE work with the Nuclear Regulatory Commission (NRC) so an early approval date for the TRUPACT-II Shipping Package Revision 21 (SARP – Revision 21) ensures all SRS high activity drummed TRU waste is removed by 2008 and requests a presentation on the status by January 25, 2005.

DOE is on schedule to have NRC approve the Safety Analysis Report for the TRUPACT-II Shipping Package SARP – Revision 21 in March 2005, three months ahead of schedule. Once NRC has approved the revision, DOE will brief the CAB on the changes and the drummed waste affected by the changes.

Parts 4 and 5 request an update by January 25, 2005, on the licensing effort for TRUPACT-III shipping containers; on the nondestructive assay equipment deployment; and to expedite the installation and provide the status of the Modular Repackaging Facility. You requested that DOE maintain the accelerated TRU waste shipments at 20 per month and also provide an update by January 25, 2005.

DOE agrees and will provide a status update to the CAB by January 25, 2005.

Part 6 recommends that DOE develop a backup plan to the risk-based end state (RBES) variance and disposition of plutonium (Pu-238) contaminated TRU waste and provide an update by November 16, 2004.

DOE expects the majority, if not all of the contaminated Pu-238 waste, can be shipped to WIPP once the waste is fully characterized and permit changes and/or one-time exemptions with the New Mexico Environmental Department have been pursued. In the near future, it is important to focus on the current objective to ship all TRU waste to WIPP and only develop backup plans if it becomes apparent all avenues to ship the waste to WIPP have been exhausted. If DOE decides to change the SRS TRU waste baseline and pursue an RBES for some of the waste, DOE will include the CAB in the decision process.

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

Sincerely,



Jeffrey M. Allison  
Manager

WDPD-05-016

cc: P. Golan (EM-1), HQ  
F. Dowd, DOE-HQ  
J. Palmer, EPA-Region 4