

Department of Energy

Savannah River Operations Office P.O. Box A Aiken, South Carolina 29802

DEC 1 2 2006

Ms. Karen Patterson, Chair Savannah River Site Citizens Advisory Board 1103 Conger Drive Aiken, South Carolina 29803

Dear Ms. Patterson:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 241 – Progress of Plutonium/Uranium Extraction (PUREX) and Transuranic (TRU) Waste Disposition (Your letter, 11/15/06)

Thank you for your recommendation on the PUREX and TRU waste disposition plans presented to the CAB on November 14, 2006. My responses to the six parts of Recommendation #241 are as follows:

1. Continue to accelerate disposition of the final legacy organic PUREX, report to the Savannah River Site (SRS) CAB once it is complete, and prepare a public news release that highlights this accomplishment.

The Department of Energy (DOE) plans to disposition the final legacy organic PUREX by September 30, 2007, and will report to the SRS CAB. Upon completion, DOE will also prepare public information highlighting this accomplishment.

2. Transfer closure of the Consolidated Incineration Facility (CIF) to the Federal Facilities Agreement (FFA) program and report to the SRS CAB in October 2007 on the progress made.

DOE plans to transfer the CIF to the FFA program and will report to the SRS CAB in October 2007 on the progress.

3. Expedite shipments of legacy TRU drums, approval of the accreditation program for repackaged large box TRU wastes, and pre-licensing activities controlled by DOE for the TRUPACT-III and report to the SRS CAB in October 2007 on the progress.

DOE continues to make the SRS TRU waste program a Site priority and expects to make significant progress on these activities in Fiscal Year (FY) 2007. DOE will report on the progress to the SRS CAB in October 2007.

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4. Work with Waste Isolation Pilot Plant (WIPP), U.S. Environmental Protection Agency (EPA), and the State of New Mexico Environment Department (NMED) to accelerate the necessary program approvals from EPA and NMED to begin removing the Battelle Remote Handled (RH) -TRU waste and present the progress to the SRS CAB in October 2007.

DOE is committed to making sure it meets the Battelle agreement with the State of South Carolina and plans to ship all the Battelle RH-TRU waste currently stored at SRS to WIPP by January 1, 2009, per the agreement. DOE will continue to assess the RH-TRU program at WIPP for any opportunities to accelerate shipments. DOE will report the progress to the SRS CAB in October 2007.

5. Expedite the disposal of the high activity TRU waste on Pad 1 including the submission of an application for the issuance of a Resource Conservation and Recovery Act (RCRA) Part B Permit and present the progress to the SRS CAB in October 2007.

DOE has developed an overall baseline for the disposition of the legacy TRU waste inventory at SRS by 2013 which includes key activities such as the removal of TRU waste on Pad 1. DOE is scheduled to submit a RCRA Part B Permit for Pad 1 to the South Carolina Department of Health and Environmental Control in June 2007, and begin excavation of TRU waste containers on Pad 1 in FY 2009. DOE believes any additional acceleration would only jeopardize the planned completions scheduled in FY 2008 for the low activity drummed TRU waste program and the RCRA compliance of all the TRU waste Pads. DOE will present the overall project plan and progress for Pad 1 to the SRS CAB in October 2007.

6. Accelerate the management decisions to decrease the high activity TRU waste inventory at SRS and present the progress to the SRS CAB in October 2007.

DOE would like to clarify with the CAB that WIPP does not use the term "high activity" TRU waste. WIPP has two types of TRU waste: 1) contact handled (CH), and 2) remote handled or RH. SRS TRU waste is mainly CH with less than 5 percent being RH. In the past, SRS has used the term "high activity" TRU waste to identify some of the TRU waste stored onsite that contains Plutonium 238. The term "high activity" has also been used in TRU waste presentations with the CAB in the past. In the future, DOE will refer to the waste as being CH or RH.

DOE believes under Part 6 of the recommendation, the CAB reference to high activity TRU waste inventory means the waste stored on Pad 1. In the past, SRS has identified the waste on Pad 1 to have as much as 30 percent of the total activity in the TRU waste inventory. DOE estimates it has disposed of nearly 40 percent by volume and 30 percent by activity of the legacy TRU waste stored at SRS. DOE agrees with the CAB that the remaining waste contains the majority of the activity with Pad 1 containing nearly 50 percent of that activity.

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DOE has accelerated the SRS TRU waste program including the RH waste inventory to the point that technical challenges and external regulatory processes are now part of the critical path. DOE remains committed to disposing the TRU waste inventory at SRS.

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

Sincerely,

Jeffrey M. Allison Manager Manager

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