



Department of Energy
Germantown, MD 20874-1290

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OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

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| To GERM FLEMING | From FRED BUTTERFIELD |
| Dept./Agency DOE/SR | Phone [REDACTED] |
| Fax # [REDACTED] | Fax # [REDACTED] |
| NGN 7540-01-317-7388 5099-101 GENERAL SERVICES ADMINISTRATION | |

Ms. Ann Loadholt, Chairperson
Savannah River Site Citizens Advisory Board

Dear Ms. Loadholt:

Thank you for your December 2, 1998, letter in which you forwarded the Savannah River Site Citizens Advisory Board (SRS CAB) Recommendation Number 72. Your letter detailed SRS CAB recommendations, observations, and conditions regarding SRS's potential role in disposing of low-level waste (LLW) and mixed low-level waste (MLLW), to be decided under pending decisions from DOE's *Waste Management Programmatic Environmental Impact Statement* (WM PEIS).

DOE commits to provide your recommendations as input to DOE decision makers' selection of LLW and MLLW disposal sites. However, because the Department has not yet issued its WM PEIS disposal decisions, this response letter cannot answer all of your points directly. The following paragraphs respond to the points which can be addressed now.

Recommendation (3) states the SRS CAB's understanding that none of DOE's proposed disposal options would permit SRS to ship LLW off-site for disposal. DOE is considering caps in the Record of Decision, on the amount of off-site waste each regional disposal site would be expected to dispose of in the next 20 years, but not to name point-to-point shipper/receiver pairs. DOE's analysis to determine the potential cap waste volumes includes possible shipment of some SRS LLW off-site for disposal.

Recommendation (3) also notes that disposal of SRS "special case" LLW must clearly be a part of the LLW disposal decision process and that this waste should not be disposed of at SRS. However, as you also mention, the WM PEIS does not directly address "special case LLW." DOE's draft Radioactive Waste Management Order, O 435.1, eliminates classification of any waste as "special case," requiring that this waste be classified, treated, and disposed of as LLW, MLLW, high-level waste, or transuranic waste. Implementation guidance for the draft Order also requires field offices to ensure a process is developed and implemented for identifying the generation of radioactive waste with no identified path to disposal. Future decisions on disposition of SRS special case LLW, including how and where that waste will be disposed of, will be addressed through this process.

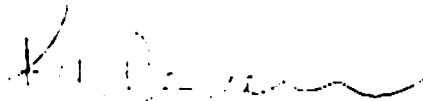


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Recommendation (4) requests DOE clarify why its information package indicated that waste disposal could violate groundwater protection criteria. The information package indicated possible violation of groundwater criteria because it *assumed no mitigation measures* (such as waste acceptance criteria) to restrain radionuclide migration. Your letter correctly noted (as does the WM PEIS) that DOE develops waste acceptance criteria to restrict radionuclides which could be disposed of in each disposal facility, thus avoiding any exceedance of drinking water standards. As a result, waste disposal which meets SRS's disposal facility waste acceptance criteria would not violate any groundwater protection criteria -- as confirmed through SRS's performance assessment and composite analysis results, which you also note in your letter.

DOE intends to make its LLW and MLLW treatment and disposal decisions by June 1999. The Department remains committed to seek and consider stakeholder input in its decision making, to ensure disposal decisions which can be implemented; your recommendations are greatly appreciated. We will continue to keep the SRS CAB informed of progress in making the WM PEIS disposal decisions. Thank you for sharing your views.

Sincerely,



Karen Guevara, WM PEIS Manager
Office of Planning and Analysis
Office of Waste Management
Environmental Management

cc:

M. Crosland, EM-22
B. Noll, SRS