

WIPP Update

Well once again the Department of Energy has been busy trying to modify the Waste Isolation Pilot Plant's (WIPP) mission and has submitted a bunch of permit modification requests (PMRs). The comment period for these modifications ends on July 14, 2003. Nuke Watch has provided ready-to-send comments. But now that your interest has been perked, here's a quick breakdown of what the Department of Energy (DOE) has submitted:

Item 1: Packaging-Specific Drum Age Criteria for New Approved Waste Containers

Remember all those new drums that DOE wanted to bring to WIPP? Well, just as a reminder, they were the 85-gallon, 100-gallon, and the ten-drum overpacks. Since DOE got what it wished for from the last permit modification request (PMR) bonanza, they now need to specify the drum age criteria for these new drums. Here's the scoop, before DOE can send a drum of waste to WIPP they have to make certain that the waste has reached 90% steady state concentration. In other words, they have to make sure that the waste is stable enough to ship and to dump at WIPP. That's what this modification is about. But DOE has not justified its assumptions about its drum age criterion numbers, and because of this the PMR is incomplete. Furthermore, this PMR needs to be a Class 3, not a Class 2. A Class 3 will allow for a hearing to take place where questions can be asked, and more thorough answers can be found.

Item 2: Removal of Booster Fans

Once again DOE is submitting this modification. Last time they submitted it this PMR it was as a Class 1 permit modification request. (Class 1's are usually small items such as typos or name changes, not typically used when the intent is to remove three massive fans.) Well we are here again, this time as a Class 2. DOE wants to make more room at WIPP and believes that the booster fans are no longer needed for safety. Since DOE doesn't think they need them any more, then they believe they should be able to get rid of them. But the PMR does not answer many of the questions that were asked when it was a Class 1 PMR! Without these answers, this modification should not be approved.

Item 3: LANL Sealed Sources Waste Streams Headspace Gas Sampling and Analysis Requirements

A sealed source is any special nuclear material or byproduct material that is encased in a capsule designed

to stop it from leaking. What DOE wants to do, is instead of the normal headspace gas sampling and analysis (which they have to do for all other waste) they want to just assign a concentration value. The reason for this is that DOE believes that the only way headspace gas sampling could be taken from a sealed source is through destroying the capsule that the source is sealed in. DOE also believes that sealed sources do not contain volatile organic compounds (VOCs), the one of the items headspace gas sampling looks for. Since DOE believes that these sources do not have VOCs then there would be no reason to sample for them. Unfortunately this PMR is insufficient as it does not have enough information to make a well informed judgment. Furthermore, a number of these sealed sources are not defense wastes so they cannot be dumped at WIPP.

Item 4: Remove Formaldehyde as a Required Analytical Parameter for LANL (Los Alamos National Laboratory)

DOE wants to remove formaldehyde as an analyte from waste streams at LANL. DOE believes that in waste streams at LANL there is no formaldehyde to be found. Since DOE has not found any formaldehyde in the LANL waste streams they do not wish to continue checking for it in their characterization of LANL waste. But LANL has a terrible track record for its acceptable knowledge (AK). AK is what DOE is basing its decision on and therefore is a poor PMR right from the start.

Item 5: Add New Hazardous Waste Numbers

DOE wants to add hazardous waste numbers to the current list of acceptable waste numbers. Rocky Flats Environmental Technology Site has found that the waste numbers that are on the list have been treated already and no longer exist in their original state. Since this is the case DOE wishes to add them to the acceptable waste list. Once again, though, DOE does not give enough detail to remove the concern that these new hazardous waste numbers will not negatively impact human health or the environment. This modification can't be approved because of this doubt.

Item 6: Construction and Use of Hazardous Waste Disposal Units

WIPP expects that it will be accepting waste much faster than they originally believed they would be. Because of this magnitude of acceptance DOE is requesting that they be able to mine out new panels earlier than was permitted for. This is a Class 3 PMR.

-- Geoff Petrie