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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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January 29, 1998

The Honorable Federico Peña Secretary of Energy 1000 Independence Avenue Washington, D. D. 20585-1000

Dear Secretary Peña:

On May 26, 1994, the Defense Nuclear Facilities Safety Board (Board) issued its Recommendation 94-1, Improved Schedule for Remediation in the Defense Nuclear Facilities Complex, to the Secretary of Energy. When this Recommendation was made, the future disposition of plutonium-bearing residues at the Rocky Flats Plant and at other nuclear defense sites had not been decided. It appeared to the Board then that essentially all plutonium belonging to the Department of Energy (DOE) regardless of physical and chemical form might be retained for a long time. That view was the basis for sub-recommendation (5) That preparation be expedited to process the containers of possibly unstable residues at the Rocky Flats Plant, and to convert constituent plutonium to a form suitable for safe interim storage.

The Board observes that the more hazardous of these residues at the Rocky Flats Plant (now the Rocky Flats Environmental Technology Site, RFETS) have now been so treated that for the near future they are relatively benign. The Board is also informed that DOE intends to discard the plutonium in many of the items of residue, mostly through planned entombment in the Waste Isolation Pilot Plant (WIPP).

When plutonium-bearing residues of less immediate hazard can be interred in WIPP in the relatively near future, the Board's concerns that motivated the sub-recommendation stated above are no longer so urgent. The objective could be reached instead by expeditious burial. Similar considerations apply to plutonium-bearing residues from other defense nuclear sites.

Assuming that current plans for WIPP's opening remain effective, the Board would therefore look favorably on revised plans for timely movement of any such residues from defense nuclear facilities to that repository without further processing, if no immediate safety problems are present. It is realized that, for other reasons than are in the Board's purview, other actions such as repackaging and dilution may be called for in such circumstances.

The Board would like to review any changes in plans that may result from the above considerations before they are fully decided.

Sincerely.

Iohn T. Conway

Chairman