



## ENVIRONMENTAL EVALUATION GROUP

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

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October 5, 1989

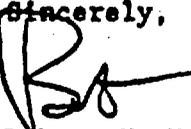
Mr. John Linehan  
U.S. Nuclear Regulatory Commission  
Room 4D23  
Washington, DC 20555

Dear Mr. Linehan

Enclosed please find a copy of the latest EEG report, "Evaluation of the DOE Plans for Radioactive Experiments and Operational Demonstration at WIPP," EEG-42, by Dr. Lokesh Chaturvedi. The report examines the evolution of the concept of tests with radioactive wastes, the problem to be addressed by these tests and the questions of timing, validity, and usefulness of these tests. It concludes that it is more important to make efforts to find solutions to the potential problems in maintaining the long-term integrity of the repository due to gas production by the waste and brine inflow from the rock, rather than obtain more precise predictions of the amount of gas being generated. To that end, the report recommends modifying the proposed experiments to study the effectiveness of several possible engineered modifications to the waste and design of the repository. It also recommends immediate publication of the calculations that form the basis for WIPP scientists' conclusion of difficulties in meeting compliance with the U.S. Environmental Protection Agency (EPA) Standards for disposal of transuranic (and high-level) waste (40 CFR 191).

The EEG does not see a need for shipping any waste to WIPP for "operational demonstration" before the facility can be demonstrated to meet compliance with the EPA Standards. Reasons for this position are provided in the report.

Sincerely,

  
Robert H. Neill  
Director

RHN:lsb

Enclosure

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