

memorandum

DATE: JUN 20 1991

REPLY TO
ATTN OF: EM-50.1 (Boyd:353-7282)

SUBJECT: Use of United States Department of Energy (DOE) and Department of Defense (DOD) Facilities as Safe Parking Areas

TO: Mike McFadden, WIPP

R	RECEIVED	Department of Energy
	JUN 25 1991	<i>AW</i> <i>BBS</i>

The existing 1989 Interagency Agreement between DOE and DOD for the Temporary Parking of Transuranic Waste Shipments at Military Installations states that: "In the event of civil disorder, natural disaster, severe weather conditions, or other emergency situations, the need may arise to temporarily layover a TRU waste shipment..."

Under these conditions, DOE also considers any of its facilities as suitable temporary parking areas, and these installations are authorized for such use. In some cases, this may be as simple as returning to the point of origin in the event of unexpected adverse weather. If needed, the Waste Isolation Pilot Plant (WIPP) Central Monitoring Room Operator (CMRO) will coordinate with the DOE facility desired for safe parking. This is similar to the procedure used to coordinate use of a DOD facility.

As a result of discussions with the Western Governors' Association Task Force and action items from the November TRANSAX '90 exercise, additional issues concerning safe parking of "damaged" TRUPACT-II's have been identified. To address these issues, an interpretation of a "damaged" TRUPACT-II is required. Guidance received from the U.S. Department of Transportation, dated November 6, 1990 (attached), stated that: "49 CFR 177.854 and 177.861 authorize the further movement of the package, under specified conditions" and "If the repair to the package is adequate to prevent a release to the environment or the contamination of other lading on the vehicle, the package may be shipped to a facility for further repair, repacking or disposal, as appropriate." The intent is to SAFELY move a package to its destination.

Since this guidance states that it is safe to move a package to its destination, DOE would move a "safe" damaged TRUPACT-II to a DOE generator/storage site or to WIPP as appropriate, rather than to a DOD installation. A damaged TRUPACT-II that is considered "not safe" to move would be properly repacked by use of mobile loading capability in the safest manner possible.

It will continue to be the DOE policy to coordinate closely with State and local organizations in all recovery actions.

Susan H. Denny
 Susan H. Denny, Director
 Transportation Management Program
 Office of Technology Development

Attachment