



**INSTITUTE FOR ENERGY AND
ENVIRONMENTAL RESEARCH**

6935 Laurel Avenue, Suite 201
Takoma Park, MD 20912

Phone: (301) 270-5500
FAX: (301) 270-3029
e-mail: ieer@ieer.org
<http://www.ieer.org>

April 21, 2006

Ms. Elizabeth Forinash
Center for Federal Regulations (6608J)
Office of Radiation and Indoor Air
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington DC 20460

Dear Ms. Forinash:

A reader of IEER's report, *Weapons Plutonium in Los Alamos Soil and Waste: Environmental, Health, and Security Implications*, brought to my attention that my analysis of plutonium in Los Alamos waste did not take into account plutonium used in hydronuclear tests at Los Alamos. As a result, my colleague Brice Smith and I decided to correct the oversight and take the opportunity to thoroughly review and revise the analysis as necessary. We have also decided to issue it as a separate report: *Dangerous Discrepancies: Missing Plutonium in Los Alamos National Laboratory Waste Accounts*, since there was no problem with the first part dealing with residual radioactivity and cleanup. A copy of the revised report is enclosed. While some details are different from Part II of the November 29, 2005 report, the major conclusions of the analysis are unchanged. We have concluded that Los Alamos plutonium accounts have a discrepancy of about 300 kilograms of plutonium. The range is 270 kilograms to 350 kilograms. This report reaffirms that there could be a great deal more plutonium in Los Alamos waste designated for WIPP than is shown by the official WIPP data.

I look forward to the results of your investigation and re-affirm the request to stop the shipments to WIPP for LANL that was made in the earlier letter from Don [Hancock] and myself. Thank you very much.

Sincerely,

Arjun Makhijani, Ph.D.
President, Institute for Energy and Environmental Research

cc: Ambassador Linton Brooks, Administrator NNSA
Elizabeth Cotsworth, EPA
David Moody, CBFO