

RED LANL FFCO/97

Hand Delivered
Janice

Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

APR 04 1997



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505

Dear Mr. Garcia:

Subject: Site Treatment Plan Corrective Action Plan (STP-CAP), Federal Facility Compliance Order (FFCO), February 14, 1997 Letter of Violation

The purpose of this letter is to submit the STP-CAP requested in the letter sent by the New Mexico Environment Department (NMED), referenced above. The Department of Energy (DOE) and the University of California (UC) have submitted this STP-CAP to address concerns raised in recent correspondence and meetings with NMED, as documented in the referenced Letter of Violation issued to Los Alamos National Laboratory (LANL). Elements of the STP-CAP address each of the five violations at issue, as noted in your letter. Each is discussed below:

Issue 1: *"DOE and UC failed to provide NMED notification pursuant to Section XX.C.1 of the FFCO and meet the compliance date within the scheduled timeframe as set forth in the FFCO Site Treatment Plan (STP) Compliance Plan Volume (CPV) Section 3.1.1 Activity A. This violation is supported by facts outlined in a letter dated December 9, 1996 from DOE to NMED."*

The STP CPV, page 7, Activity 3.1.1A, required DOE and UC to "(M)et all regulatory requirements prior to shipping waste" for shipments of STP covered wastes scheduled for off-site thermal treatment, i.e., IPA wastes (MWIR waste ID no. LA-W901) and scintillation fluids (MWIR waste ID no. LA-W902), by September 30, 1996. As certified to NMED in the referenced December 9, 1996 letter, this activity had been completed in a timely manner by DOE and UC. Regulatory requirements are verified on a shipment-by-shipment basis. This had in fact been done prior to making each of the shipments completed before the referenced compliance date. Additionally, by September 30, 1996, the regulatory requirements had been met for the one shipment of covered wastes from these treatability groups remaining to be sent (i.e., the shipment sent on December 18, 1996).

However, DOE and UC had failed to send NMED a written notification within ten days of the compliance date, as required by Section XX.C.1 of the October 4, 1995 FFCO issued to LANL. This was reported to NMED in the referenced December 9, 1996 letter. The STP-CAP identifies two root causes of this occurrence and addresses each with a series of corrective action steps (see STP-CAP, enclosed herewith).

Issue 2: *"DOE and UC failed [to] meet the compliance date within the scheduled time frame as set forth in the FFCO CPV, Section 3.4.2 'Activities for waste items in part 1 of this treatability group', as amended October 30, 1996 (CPV Amendment 1.0 dated October 30, 1996). This violation was noted during a meeting held between the parties on January 27, 1997."*



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1996). This violation was noted during a meeting held between the parties on January 27, 1997.”

This Sort, Survey and Decontamination (SSD) activity (Activity A in what is now CPV Section 3.4.2, Rev. 3.0) required completion of the field survey activities for a subgroup of these wastes by October 30, 1996. As stated during the referenced meeting, and in our February 11, 1997 correction letter, DOE and UC had incorrectly reported (in Section 1.1, page 2 of our October 21, 1996 amendment/revision request letter) that field survey activities had been completed for “approximately 1,049” items, comprising what is now subgroup 1 of the treatability group, “Nonradioactive or suspect waste items to be surveyed.” This was reported because these 1,049 SSD items had been incorrectly counted as having been surveyed by Grand Junction Project Office (GJPO) personnel prior to the October 30, 1996 due date.

Since DOE and UC believed these 1,049 SSD items were completed, and that no further field work was required for these items to meet the Activity A due date, they were improperly retained in subgroup 1 (1,049 items). Thus, they were not included in the item counts for subgroups 2 and 3 in LANL’s Amendment 1.0 and Revision 3.0 request, or expected to be subject to the deadlines for Activities D and G.

During the final quality assurance review of this treatability group, DOE and UC discovered that it had incorrectly determined the number of items completed by GJPO. Although this error cannot be reproduced, thereby preventing the determination of the exact cause, contributing factors include errors in LANL’s database on the assignment of this treatability group to the applicable items, the complexity of linking GJPO’s item tracking system to LANL’s database, and an inconsistency between GJPO and LANL regarding which items were in this treatability group. Therefore, database queries were executed and used for project management and reporting, without sufficient review, verification, or use of other quality assurance processes.

This issue is unique to this treatability group. This is the only treatability group being surveyed by off-site personnel not under contract to LANL. All of the rest of the treatability groups (except dewatered treatment sludge) have far fewer items than this one; the next largest, after the dewatered treatment sludge, has less than one-third as many items as were originally in the SSD treatability group. The size and complexity involved with the management of data for this treatability group made it nearly impossible to perform manually, and required the use of many database queries.

However, this issue has identified a weakness in the processes for other treatability groups - quality assurance. The management of data for all other treatability groups has included, and will continue to include the use of hard copies of STP item lists, requiring verification against database information. The STP-CAP identifies two root causes of this occurrence and addresses each with a series of corrective action steps (see STP-CAP, enclosed herewith).

Issue 3: “DOE and UC failed to provide NMED notification pursuant to Section XX.C.1 of the FFCO regarding waste received off-site within the scheduled time frame as set forth in the FFCO CPV Section 3.1.1 Activity C [‘Provide documentation to NMED that waste was received at off-site facility with a milestone date of within 45 days after receipt of waste at treatment facility’]. This violation is supported by facts outlined in a letter from DOE to NMED dated January 31, 1997 and was noted during a meeting between the parties held January 27, 1997.”

On April 19, 1996, LANL shipped 48 items of isopropyl alcohol wastes to Diversified Scientific Services, Incorporated (DSSI), Oak Ridge, Tennessee. NMED was not formally notified of this shipment until receipt of the DOE and UC letter dated January 31, 1997, although DOE and UC timely notified NMED (by letter dated January 9, 1997) of completion of treatment of all wastes comprising this treatability group.

When the signed manifest copies were received from DSSI, copies were not forwarded to the LANL organization that prepares the notification letters. No one had been designated the responsibility to ensure the 45-day shipment notification was made in a timely manner. The STP-CAP identifies three root causes of this occurrence and addresses each with a series of corrective action steps (see STP-CAP, enclosed herewith).

Issue 4: "DOE and UC failed to obtain approval from NMED for a revision as required under Section X of the FFCO for increases in Treatability Groups reported in the 1995 Annual Update. This violation is supported by letter from DOE to NMED dated January 31, 1997."

In early 1995, DOE and UC prepared a draft STP that listed the various treatability groups, the number of items known at that time to be in each, and the waste volume associated with these items. On October 4, 1995, NMED issued the FFCO and STP, including the draft STP covered waste volumes in the final CPV inventory. In the meantime, DOE and UC had been actively reducing the volume of waste in several treatability groups, by off-site shipment of waste for treatment and on-site decontamination of lead. After the FFCO was issued, DOE and UC discovered that a series of items had been inadvertently omitted from the draft STP inventory because of an error in the database query used to construct the draft STP inventory.

The FY 1995 Annual Update submitted on March 31, 1996, reported volume changes through September 30, 1995, which is prior to the issuance of the FFCO by NMED. All of the corrections to the inventory in the STP reported in the FY 1995 Annual Update pre-dated the issuance of the FFCO and were not included in the original CPV inventory. In the transmittal letter for the FY 1995 Annual Update, DOE and UC committed to submitting a revision for the corrections reported in the FY 1995 Annual Update. Since this submittal, however, NMED has requested a number of clarifications related to the volume information, which are still ongoing as of this writing.

There is no specified time period in the FFCO for submitting a revision to NMED, except that a revision must be submitted within two Annual Update cycles. Nonetheless, on March 31, 1997, DOE and UC submitted a request for Revision No. 5, concurrently with submission of the FY 1996 Annual Update, that formally incorporates all covered waste volumes discussed in the FY 1995 and FY 1996 Annual Updates (i.e., all covered waste volumes identified from the date of issuance of the FFCO through the end of FY 1996) into the CPV inventory. Wastes are tentatively assigned to appropriate treatability groups, and additional compliance dates will be requested in those cases where the additional covered wastes cannot be treated within the existing compliance dates specified for each treatability group.

In addition, DOE and UC have requested that many issues regarding additions and deletions of covered wastes be addressed through an amendment to the FFCO, requested on October 29, 1996. This Order amendment is currently being considered by NMED. DOE and UC believe many of these issues will be addressed by approval of the Revision 5.0 request, as stated above, and by the proposed amendments to the FFCO.

Issue 5: "DOE and UC failed to comply with the requirements set forth in Section X.B.4 or Section VIII of the FFCO for the failure to report waste previously omitted from the October 1995 CPV inventory. This violation is supported by letter from DOE to NMED dated January 31, 1997."

The background given above for issue 4 applies in this instance as well, since the violation noted refers to the same issue regarding when and how newly identified covered waste must be incorporated into the CPV inventory. As discussed above, there is no specified time period in the FFCO for submitting this revision to NMED, except that a revision must be submitted within two Annual Update cycles. Nonetheless, DOE and UC submitted a revision request

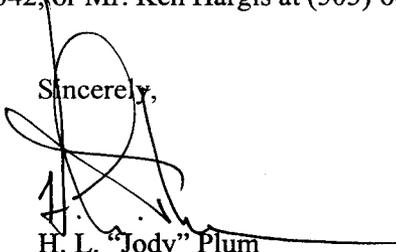
(Revision 5.0, March 31, 1997), concurrently with submission of the FY 1996 Annual Update, that formally incorporates all covered waste volumes discussed in the FY 1995 and FY 1996 Annual Updates (i.e., all covered waste volumes identified from the date of issuance of the FFCO through the end of FY 1996) into the CPV inventory. Wastes are tentatively assigned to appropriate treatability groups, and additional compliance dates will be requested in those cases where the additional covered wastes cannot be treated within the existing compliance dates specified for each treatability group.

In addition, DOE and UC have requested that many issues regarding additions and deletions of covered wastes be addressed through an amendment to the FFCO, requested on October 29, 1996. This Order amendment is currently being considered by NMED. DOE and UC believe many of these issues will be addressed by approval of the Revision 5.0 request, as stated above, and by the proposed amendments to the FFCO.

Also enclosed is a Certification Statement. These documents were prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements," of the FFCO.

DOE's and UC's records and documents related to this letter are available to NMED's staff upon request. Please contact me at (505) 665-5042, or Mr. Ken Hargis at (505) 667-2347 if you have any questions.

Sincerely,



H. L. "Jody" Plum
Office of Environment and Projects

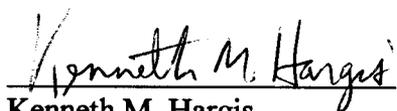
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Enclosures

CERTIFICATION

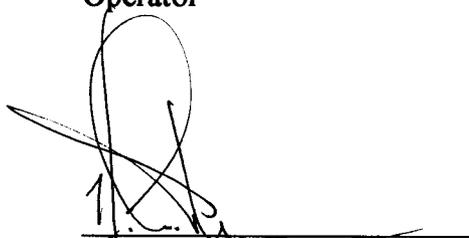
SITE TREATMENT PLAN CORRECTIVE ACTION PLAN (STPAP), FEDERAL FACILITY COMPLIANCE ORDER (FFCO), FEBRUARY 14, 1997 LETTER OF VIOLATION

I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



Kenneth M. Hargis
Manager of Operations
Waste Management Program
Environmental Management Programs
Los Alamos National Laboratory
Operator

3 April 1997
Date Signed



H. L. Plum
Regulatory Permitting and Compliance Manager
Los Alamos Area Office
U.S. Department of Energy
Albuquerque Operations
Owner/Operator

4/4/97
Date Signed

**SITE TREATMENT PLAN
CORRECTIVE ACTION PLAN (STP-CAP)**

in response to
**Federal Facility Compliance Order
(Letter of Violation)
dated February 14, 1997**

Issue 1: "DOE and UC failed to provide NMED notification pursuant to Section XX.C.1 of the FFCO and meet the compliance date within the scheduled timeframe as set forth in the FFCO Site Treatment Plan Compliance Plan Volume (CPV) Section 3.1.1 Activity A [Meet all regulatory requirements prior to shipping waste for IPA wastes and scintillation fluids, compliance date of September 30, 1996]. This violation is supported by facts outlined in a letter dated December 9, 1996 from DOE to NMED."

Background: By September 30, 1996, three shipments containing either IPA wastes or scintillation fluids had occurred, resulting in the treatment of 99.89 percent of the IPA wastes and 99.85 percent of the scintillation fluids. Two shipments were to a commercial treatment facility and one to a non-commercial off-site facility. This non-commercial facility, the WERF at INEEL, required coordination between NMED and the State of Idaho Department of Environmental Quality, as well as a revision to the FFCO and a corresponding modification to LANL's operating permit. NMED was involved with all of these activities. However, the remaining waste was not shipped until December 18, 1996.

Root Cause: No designation of responsibility for this milestone; no milestone tracking system.

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Anticipated Completion Date
Undesignated Responsibility	Update LANL's STP Implementation Plan	Correct Plan to reflect current LANL organizations	Waste Management Program Office	June 30, 1997
		Identify key roles and responsible organizations		
		Ensure that all milestones are identified in the Plan, including those following shipments		
		Identify all requirements and activities under the FFCO and STP		
		Designate responsible organizations for each milestone, requirement and activity, and data quality		
		Define process for resolving FFCO and STP compliance issues		
		Have Plan approved by appropriate management level		

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Anticipated Completion Date
		Conduct training on the Plan		
		Assign roles to personnel and implement Plan	Appropriate organizations	July 31, 1997
	Formalize LLMW work-off process	Develop written procedure for work-off of LLMW	Solid Waste Operations Group	July 31, 1997
		Identify roles of personnel in work-off process		
		Assign responsibility for applicable milestones and notifications, and determination of STP status of the waste; verification of lists of items and item data; data quality; quality assurance; and notification of shipments and receipt of waste to specific personnel		
		Formalize and verify the queries used to determine data submitted to NMED		
		Conduct formal on-the-job training for this procedure		
Inadequate Milestone Tracking	Implement computerized milestone tracking	Compile list of all fixed milestones and associated dates, including notification milestones	Solid Waste Operations Group	Completed
		Define process for adding milestones following shipments to software system	Solid Waste Operations Group	Completed
		Assign administration of software system to an individual	Solid Waste Operations Group	Completed
		Identify software system to automate advance notification of pending milestones.	Solid Waste Operations Group	April 30, 1997
		Install and implement software system	Solid Waste Operations Group	April 30, 1997
		Load all existing milestones into software system	Solid Waste Operations Group	May 31, 1997
		Test e-mail notification process	Solid Waste Operations Grp	May 31, 1997

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Anticipated Completion Date
		Write procedure for operation and administration of software system and adding milestones, including the variable milestones (e.g., notification of receipt of waste at off-site facilities)	Solid Waste Operations Group	May 31, 1997

Issue 2: "DOE and UC failed [to] meet the compliance date within the scheduled timeframe as set forth in the FFCO CPV, Section 3.4.2 'Activities for waste items in part 1 of this treatability group', as amended October 30, 1996 (CPV Amendment 1.0 dated October 30, 1996). This violation was noted during a meeting held between the parties on January 27, 1997."

Background: Section 3.4.2 deals with the survey of waste suspect of radioactive contamination, being conducted on-site with equipment and staffing provided by another DOE site. The process, known as the sort, survey, and decon (SSD) project, involved sorting waste items to separate those suspected of radioactive contamination from those known to be contaminated, surveying the waste items (including sampling for radiological analysis), and, if appropriate, decontaminating the outside surface of the waste items. The purpose was to allow some items to be declared non-radioactive, with the concurrence of NMED, and then allow these items to be treated and disposed as hazardous, non-radioactive waste. Because of a lack of treatment facilities for LLMW, this process was anticipated to allow more rapid treatment and disposal of LLMW.

This effort was conducted by personnel from the DOE's Grand Junction Projects Office (GJPO), with LANL support for facilities and material handling. The field operations for this project initiated in June, 1995 and were scheduled to complete in September, 1996. However, due to unexpected delays in facility availability for some of the activities and a decreased throughput due to the complexity of the material handling, drums contents, and safety review process for each drum, the project was almost two months behind schedule.

In the meantime, commercial and DOE off-site treatment capabilities for LLMW developed and DOE decided that the SSD project was not justified. Therefore, the field operations were terminated by the DOE at the end of July, 1996. To allow completion of the milestone for survey of these items, LANL proposed an amendment and revision that separated the 1250 items in this treatability group into three groups: those already surveyed by GJPO; those that were amenable to full RCRA/radiological sampling; and those amenable only to visual examination.

In the amendment and revision, LANL reported "approximately 1049" items as having been surveyed by GJPO (subgroup 1); that is, we incorrectly reported that Activity A in CPV Section 3.4.2, rev. 3.0, had been completed. However, during the final quality assurance review for all 1250 items in this treatability group, LANL found that between 10 and 15 percent of the 1049 items had been incorrectly counted as completed by GJPO personnel prior to the October 30, 1996 due date. We are unable to reconstruct the database queries that determined the number of items remaining to be surveyed after the subgroup 1 team completed their on-site activities. However, our investigations have identified

inconsistencies between our database and the spreadsheet used by the subgroup 1 team to track their activities. In addition, we discovered an inaccuracy in our database on the assignment of MWIR ID numbers. Basically, database queries were executed and believed, without any review, verification, or other quality assurance process.

This issue is unique to this treatability group. This is the only treatability group being processed by off-site personnel not under contract to LANL. In addition, all of the rest of the treatability groups (except dewatered treatment sludge) have far fewer items than this one; the next largest, after the sludges, has less than one-third as many items as were originally in the SSD treatability group. The size and complexity of the data management for this treatability group was nearly impossible to manage manually and required the use of database queries. The data management for all other treatability groups has included and will continue to include manual reviews of the lists of items and manual verification.

However, this issue has identified a weakness in the processes for other treatability groups - quality assurance.

Root Cause: Lack of quality assurance processes and verifications in the determination of the number of items; lack of verification of the assignment in the database of treatability groups to specific items.

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Anticipated Completion Date
Lack of Quality Assurance	Verify treatability group data in database	Compare data in database to paper list of items in each treatability group	Solid Waste Operations Group	May 31, 1997
		Correct data in database as necessary		
	Formalize LLMW work-off process	Develop written procedure for work-off of LLMW	Solid Waste Operations Group	July 31, 1997
		Identify roles of personnel in work-off process		
		Assign responsibility for applicable milestones and notifications, and determination of STP status of the waste; verification of lists of items and item data; data quality; quality assurance; and notification of shipments and receipt of waste to specific personnel		
		Formalize and verify the queries used to determine data submitted to NMED		
		Conduct formal on-the-job training for this procedure		

Issue 3: "DOE and UC failed to provide NMED notification pursuant to Section XX.C.1 of the FFCO regarding waste received off-site within the scheduled timeframe as set forth in the FFCO CPV Section 3.1.1 Activity C [*Provide documentation to NMED that waste was received at off-site facility with a milestone date of within 45 days after receipt of waste at treatment facility*]. This violation is supported by facts outlined in a letter from DOE to NMED dated January 31, 1997 and was noted during a meeting between the parties held January 27, 1997."

Background: On April 19, 1996, LANL shipped 48 items of IPA wastes to Diversified Scientific Services, Incorporated (DSSI), Oak Ridge, Tennessee. NMED was not formally notified until the receipt of DOE's and UC's letter dated January 31, 1997. When the signed manifest copies were received from DSSI, copies were not forwarded to the LANL organization that prepares the notification letters. No one had been designated the responsibility to ensure that this notification was made.

Root Cause: No designation of responsibility for this milestone; no process for notifying appropriate LANL organization that shipment had been received; no formal system for internally forwarding manifests signed by off-site facilities.

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Anticipated Completion Date
Undesignated Responsibility	Update LANL's STP Implementation Plan	Correct Plan to reflect current LANL organizations	Waste Management Program Office	June 30, 1997
		Identify key roles and responsible organizations		
		Ensure that all milestones are identified in the Plan, including those following shipments		
		Identify all requirements and activities under the FFCO and STP		
		Designate responsible organizations for each milestone, requirement and activity, and data quality		
		Define process for resolving FFCO and STP compliance issues		
		Have Plan approved by appropriate management level		
		Conduct training on the Plan		
		Responsible organizations assign roles to personnel and implement Plan	Appropriate organizations	July 31, 1997

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Anticipated Completion Date
	Formalize LLMW work-off process	Develop written procedure for work-off of LLMW Identify roles of personnel in work-off process Assign responsibility for applicable milestones and notifications, and determination of STP status of the waste; verification of lists of items and item data; data quality; quality assurance; and notification of shipments and receipt of waste to specific personnel Formalize and verify the queries used to determine data submitted to NMED Conduct formal on-the-job training for this procedure	Solid Waste Operations Group	July 31, 1997
Determination of Date for Receipt of Waste	Implement notification of receipt of signed waste manifests	Develop written procedure for data entry, including entry of dates from receipt of signed manifest, and required internal notifications Implement a pop-up window during data entry from receipt of signed manifests to remind data entry clerk to complete internal notifications Define process to add milestones following shipments to Computerized Milestone Tracking System Include shipment notification milestones in written procedure for Computerized Milestone Tracking System	Solid Waste Operations Group	April 30, 1997

Issue 4: "DOE and UC failed to obtain approval from NMED for a revision as required under Section X of the FFCO for increases in Treatability Groups reported in the 1995 Annual Update. This violation is supported by letter from DOE to NMED dated January 31, 1997."

Background: In early 1995, DOE and UC prepared a draft Site Treatment Plan (STP) that listed the various treatability groups, the number of items known at that time to be in each, and the waste volume associated with these items. On October 4, 1995, NMED issued the FFCO and STP, including the draft STP covered waste volumes in the final CPV inventory. In the meantime, DOE and UC had been actively reducing the volume of waste in several treatability groups, by off-site shipment of waste for treatment and on-site decontamination of lead. After the FFCO was issued, DOE and UC discovered that a series of items had been inadvertently omitted from the draft STP inventory because of an error in the database query used to construct the draft STP inventory.

The FY95 Annual Update submitted on March 31, 1996 reported volume changes through September 30, 1995, which is prior to the issuance of the FFCO by NMED. All of the corrections to the inventory in the STP reported in the FY95 Annual Update pre-dated the issuance of the FFCO and were not included in the original CPV inventory.

In the transmittal letter for the FY95 Annual Update, DOE and UC committed to submitting a revision for the corrections reported in the FY95 Annual Update. Since this submittal, however, NMED has requested a number of clarifications related to the volume information, which are still ongoing as of this writing.

There is no specified time period in the FFCO for submitting a revision to NMED, except that a revision must be submitted within two Annual Update cycles. Nonetheless, on March 31, 1997, DOE and UC submitted a request for Revision No. 5, concurrently with submission of the FY96 Annual Update, that formally incorporates all covered waste volumes discussed in the FY95 and FY96 Annual Updates (i.e., all covered waste volumes identified from the date of issuance of the FFCO through the end of FY96) into the CPV inventory. Wastes are tentatively assigned to appropriate treatability groups, and additional compliance dates will be requested in those cases where the additional covered wastes cannot be treated within the existing compliance dates specified for each treatability group.

In addition, DOE and UC have requested that many issues regarding additions and deletions of covered wastes be addressed through an amendment to the FFCO, requested on October 29, 1996. This Order amendment is currently being considered by NMED. DOE and UC believe many of these issues will be addressed by approval of the Revision 5.0 request, as stated above, and by the proposed amendments to the FFCO.

Issue 5: "DOE and UC failed to comply with the requirements set forth in Section X.B.4 or Section VIII of the FFCO for the failure to report waste previously omitted from the October 1995 CPV inventory. This violation is supported by letter from DOE to NMED dated January 31, 1997."

The background given above for issue 4 applies in this instance as well, since the violation noted refers to the same issue regarding when and how newly identified covered waste must be incorporated into the CPV inventory. As discussed above, there is no specified time period in the FFCO for submitting a revision to NMED, except that a revision must be submitted within two Annual Update cycles.

Nonetheless, DOE and UC submitted the Revision 5.0 request, concurrently with submission of the FY96 Annual Update, that formally incorporates all covered waste volumes discussed in the FY95 and FY96 Annual Updates (i.e., all covered waste volumes identified from the date of issuance of the FFCO through the end of FY96) into the CPV inventory. Wastes are tentatively assigned to appropriate treatability groups, and additional compliance dates will be requested in those cases where the additional covered wastes cannot be treated within the existing compliance dates specified for each treatability group.

In addition, DOE and UC have requested that many issues regarding additions and deletions of covered wastes be addressed through an amendment to the FFCO, requested on October 29, 1996. This Order amendment is currently being considered by NMED. DOE and UC believe many of these issues will be addressed by approval of the Revision 5.0 request, as stated above, and by the proposed amendments to the FFCO.