



Waste Management Division

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Date: December 20, 2013
Refer To: WM-DO-13-0096
LAUR: 13-29562

RETURN RECEIPT REQUESTED

Mr. Timothy Hall, STP Project Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Hall:

SUBJECT: Request to Extend Compliance Plan Milestone for Activity 3.2.J, Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO) Site Treatment Plan (STP)

The purpose of this letter is to provide additional information to support LANL's September 4, 2013 request to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) to extend the referenced milestone in the Compliance Plan (CP) volume of the Site Treatment Plan. By letter dated September 4, 2013, the U.S. Department of Energy/National Nuclear Security Administration (DOE/NNSA) and Los Alamos National Security, LLC (LANS) (collectively "the Respondents") requested an extension of the existing December 31, 2013 compliance date for shipment of remaining High Activity waste (LA-W934), to June 30, 2018. Additional information justifying the request is presented below and in Enclosure 1.

a. Detailed description of the proposed revision.

STP Activity 3.2.5 currently requires that LANL complete shipment of existing High Activity waste (LA-W934) to an offsite facility for treatment, or complete parallel options, by December 31, 2013 (per CP Table 3.2-1). As of March 2010, there were 17 *High Activity Waste* items in LANL's LA-W934 inventory, having a total volume of 31.49 cubic meters. Since then, LANL has successfully shipped and disposed 95.9 percent of this mixed low-level waste (MLLW) inventory, leaving only five waste containers having a total remaining volume of 1.2985 cubic meters. These five MLLW items cannot be shipped off-site in their current configuration before the December 31, 2013



compliance date. This extension would affect only the five waste containers, which account for only 4.1 percent of the waste originally in this treatability group.

Description	EPA Codes	Volume (m ³)-each container	Status of Disposal Efforts
Tritium cryotrap with mercury contamination (container no. C00130818)	D009	0.0125	<p>LANL has identified commercial facilities able to accept the RCRA¹ components of the wastes for treatment if they could be segregated from the tritium waste components. None are able to accept the wastes as currently packaged.</p> <p>However, DOT² regulations applicable to this container require use of a compliant Type-B shipping package. If a shipping container cannot be obtained, and approved by DOE and/or the Nuclear Regulatory Commission (NRC), the waste would require repackaging at LANL before it could be sent for disposal off-site.</p>
Mole sieves and squib assemblies with very high tritium (packaged inside Flanged Tritium Waste Containers or FTWCs) (container nos. C09203611, C09203612, C09203613, C09203614)	D008	0.3215	<p>LANL submitted a detailed waste profile on July 15, 2013 to the Nevada National Security Site (NNSS) to pursue acceptance of the four FTWCs containers by NNSS without prior segregation/repackaging. However, to accept them as currently packaged, NNSS would have to approve exceptions to their Waste Acceptance Criteria (NNSSWAC) for gas pressure, void space, the potential for liquid, and the high activity levels associated with the tritium.</p> <p>The full NNSS Waste Acceptance Review Panel will not formally review LANL's waste profile before February 2014. If NNSS accepts the waste for disposal, LANL anticipates it would then be able to ship the four containers as soon as a way is found to transport them in compliance with the applicable DOT requirements. However, the four containers are not shippable as-is due to internal gas pressures and the high activity levels associated with the tritium. DOT requirements applicable to these containers will require use of a compliant Type-B shipping package.</p> <p>If a shipping container cannot be obtained, and approved by DOE/NRC, the waste would require repackaging at LANL before it could be sent for disposal off-site.</p>
TOTAL (5 containers)		1.2985	

b. Rationale for the proposed revision.

These five MLLW items cannot be shipped off-site in their current configuration before the December 31, 2013 compliance date because (a) no off-site treatment and disposal facilities have accepted the wastes as currently packaged; (b) they cannot be transported in compliance with DOT requirements as currently packaged; and (c) there is no on-site LANL facility capable of or approved for repackaging these wastes. Enclosure 1 provides supplemental information addressing

¹ Resource Conservation and Recovery Act

² United States Department of Transportation

each of these areas, as follows:

1. documentation showing which off-site treatment and disposal facilities have been contacted and the reasons those facilities will not accept the waste in its current form.
2. documentation showing that "DOE/LANS have been unable to identify an available Type B shipping container anywhere in the United States having a current, approved Certificate of Compliance with the appropriate specifications to allow for DOT-compliant shipment of any of the five remaining *High Activity Waste* containers."
3. additional detail demonstrating that LANL does not have an approved on-site RCRA facility capable of opening the FTWCs containers for repackaging and additional characterization (if required for off-site shipment). This information is required in order for NMED to issue a Temporary Authorization to process the FTWCs at Technical Area (TA) 16.
4. the reasons why the TA-16 Authorization Basis change may not be approved until October 2016, as well as the reasons for waiting until May 2017 to request a Temporary Authorization.
5. the exact location (i.e., which permitted unit(s) at TA-54) where the subject waste containers are currently stored.
6. If the containers are stored at Area G, they will need to be moved in 2015 in order to begin closure of Area G in accordance with the Consent Order. Discussion of where the containers will be stored once closure of Area G begins.

c. The anticipated length of any delay in performance that would result from the proposed revision, including all compliance dates that would be affected.

As stated above, the five affected items cannot be shipped off-site in their current configuration before December 31, 2013, which is the only STP compliance date affected. Therefore, the maximum possible delay in performance that would result from the proposed revision is equal to the duration of the requested extension, i.e., until June 2018.

d. If the proposed revision would result in a delay in performance, a plan for implementing all reasonable measures to address the cause of the delay, to avoid or minimize the delay, and to avoid such delays in the future, and a schedule for implementing such plan.

Between now and June 2018, NNSA/LANS will continue to diligently pursue all possible options to ship the waste off-site prior to that date. Since the early 1990s, LANL has sent MLLW to a dozen different facilities for treatment and/or disposal. However, many of them cannot accept high-activity, high-tritium wastes, and some are not approved by the DOE for treating radioactive waste. In addition, facilities used by DOE have to pass audits by the DOE Consolidated Audit Program (DOECAP). As detailed in Enclosure 1, for several years DOE/NNSS have been aggressively working with all available potential disposal facilities to pursue their acceptance of this waste. Although one or more of the TSD facilities listed in Enclosure 1 could accept the RCRA components of the wastes for treatment if they could be segregated from the tritium waste components, none are able to accept the wastes as currently packaged.

Nevertheless, LANL submitted a detailed waste profile request to NNSS for review on July 15, 2013, in the hopes that NNSS might be able to accept the wastes as currently packaged. Doing so would require NNSS to approve exceptions to their Waste Acceptance Criteria (NNSSWAC) for gas pressure, void space, the potential for liquid, and the high activity levels associated with the tritium. NNSA/LANS have been informed that NNSS will not review LANL's disposal request before February 2014.

At the same time, DOE/NNSS have been aggressively working to secure a DOT-compliant Type B shipping container capable of transporting this waste as soon as a receiving facility is confirmed. However, the two available 10-160B shipping casks in the United States are 100 percent committed to other shipments for the next 1-2 years. Even when a cask becomes available, it cannot be used until a revised Certificate of Compliance that specifically addresses the waste items being transported is approved by DOE and/or the Nuclear Regulatory Commission. At this time, DOE/LANS have determined that neither of the 10-160B shipping casks in the United States has a current, approved Certificate of Compliance with the appropriate specifications to allow for DOT-compliant shipment of the five LANL *High Activity Waste* containers. Supporting detail is provided in Enclosure 1.

LANL is implementing all reasonable measures to resolve these issues and address this delay. If these alternatives fail, DOE/LANS will have no option but to pursue repackaging on-site, as discussed in the September 4, 2013 extension request.

In accordance with the requirements of Section XX, "*Documents, Information, and Reporting Requirements*," of the FFCO, we certify, as the project managers responsible for overseeing the implementation of the Site Treatment Plan for LANS and for Los Alamos Site Office/National Nuclear Security Administration, that to the best of our knowledge and belief, the information in this document is true, accurate, and complete.

If you have any questions, please contact Monica Noll at (505) 667-5999 or Andrew Worker at (505) 606-0787.

Sincerely,



for Monica D. Noll
STP Project Manager
Los Alamos National Laboratory

Sincerely,



Andrew Worker
STP Project Manager
Los Alamos Field Office

MN/AW: lm

Enclosure 1: Information to Support the Proposed Extension

Cy: John Kieling, NMED/HWB, Santa Fe, NM
Laurie King, EPA Region 6, Dallas, TX (E-File)
George Rael, NA-OO-LA, (E-File)
Peter Maggiore, NA-OO-LA, (E-File)
George Henckel, NA-OO-LA-, (E-File)
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Carl A. Beard, PADOPS, (E-File)
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WM-DO Correspondence File, K491

ENCLOSURE 1

INFORMATION REQUESTED BY NMED-HWB TO SUPPORT THE PROPOSED EXTENSION OF COMPLIANCE DATE FOR ACTIVITY 3.2 (J) IN THE LOS ALAMOS NATIONAL LABORATORY SITE TREATMENT PLAN (STP)

As of March 2010, there were 17 *High Activity Waste* items in LANL's LA-W934 inventory, having a total volume of 31.49 cubic meters. Since then, LANL successfully shipped and disposed 95.9 percent of this inventory, leaving a total remaining volume of 1.2985 cubic meters. The remaining *High Activity Waste* volume consists of five containers as of September 9, 2013. These five MLLW items cannot be shipped off-site in their current configuration before the December 31, 2013 compliance date because (a) no off-site treatment and disposal facilities have accepted the wastes as currently packaged; (b) they cannot be transported in compliance with DOT requirements as currently packaged; and (c) there is no on-site LANL facility capable of or approved for repackaging these wastes.

The following sections of this enclosure provide supplemental information pertinent to each of these areas.

1. Documentation showing which off-site treatment, storage and disposal facilities (TSDFs) have been contacted and the reasons those facilities will not accept the waste in its current form.

Since the early 1990s, LANL has sent MLLW for treatment to approximately a dozen different facilities. A number of commercial and DOE facilities have had success treating certain LANL STP wastes in the past³, primarily in treatability studies (done on samples only). The treatability study facilities are not discussed further here, because they cannot accept high-activity, high-tritium wastes as treatability study material, and they are not approved by the DOE for treating radioactive waste. Facilities used by DOE have to pass audits by the DOE Consolidated Audit Program (DOECAP). Other DOE sites and commercial facilities have been informally contacted at annual radioactive waste or hazardous waste conferences regularly attended by LANL representatives, such as DOECAP, the DOE Mixed Waste Focus Area, Waste Management Symposia, NNSS, FedRad, TSDF users conferences, and others. Some facilities contacted have been unable so far to give LANL more than advice. These include Oak Ridge national Laboratory, NNSS, Sandia, Hazen Research, StataG, Argonne/Chicago Office, and the Portsmouth DOE facility.

As detailed in Table ES-1, LANL identified nine off-site facilities as the most likely candidates for accepting all five containers, including two DOE facilities (Lawrence Livermore National Laboratory and the Nevada National Security Site). Perma-Fix owns a parent facility in Florida, and a number of subsidiary facilities –Material & Energy Corporation (M&EC) in Tennessee; Diversified Scientific Services, Inc.(DSSI) in Tennessee, and Perma-Fix NorthWest in Washington. LANL approached Perma-Fix with consideration of all of its subsidiary facilities for this waste. LANL likewise approached Energy Solutions, Inc. with consideration of both its Clive facility in Utah and its Bear Creek Operations in Tennessee. As of this date, LANL has found only one

³ They included WERF, IT Corp/TSCAI, LANL, ARS, CUA/VSL, CMRI/ADA, and PEcoS.

facility (Perma-Fix/M&EC, Tennessee) that can potentially treat the cryotrap, and only one facility (NNS) that might be able to accept the FTWCs as currently packaged, without prior segregation, treatment, and repackaging. LANL is awaiting a response from NNS following their review of the waste profile currently in process (response expected in February 2014). Detailed information regarding all the facilities contacted, status, and LANL's results is provided in Table ES-1 at the end of this enclosure.

2. Documentation showing that "DOE/LANS have been unable to identify an available Type B shipping container anywhere in the United States having a current, approved Certificate of Compliance with the appropriate specifications to allow for DOT-compliant shipment of any of the five remaining High Activity Waste containers."

None of the five containers is currently shippable for treatment and disposal as-packaged. To comply with Department of Transportation (DOT) regulations, these high-activity wastes must be transported in a compliant Type-B shipping package. Over the last 8-10 months, NNSA/LANS have evaluated all candidate certified Type B Casks. The available Type B Casks and their current status are as follows:

- 10-160B Cask: Type B Cask with dimensions of 67 ¾" diameter x 76 ¾" height
- 8-120B Cask: Type B Cask with dimensions of 61.8" diameter x 74.9" height
- Midus Cask: Type B Cask designed primarily for medical isotopes. Internal dimensions are 3.3" diameter x 5.3" height
- 3-60B Cask: Design licensed only, no casks in inventory. Internal dimensions are 35" diameter x 109.38" height

Only the 10-160B casks can handle the tritium content associated with the five STP waste items, and none of the Type B casks are certified for flammable gases greater than 5 percent. Only two 10-160B casks are available in the US: one is owned by the DOE; the others by a subcontractor, EnergySolutions Inc. The DOE cask is fully committed to other DOE shipments for a minimum of 1 year. The EnergySolutions is 100 percent committed to other DOE waste projects (the first being the LANL 3706 program) for the next 2 years.

A revised Certificate of Compliance for the 10-160B shipping cask that specifically addresses the waste items being transported (specifically including flammable gases greater than 5 percent) must be obtained in order to transport these containers offsite. Once a Type B shipping container becomes available, approval of a revised Certificate of Compliance with the appropriate specifications to allow for DOT-compliant shipment of any of the five remaining High Activity Waste containers will take an additional 6-18 months to complete. Points of contact for verification of this information are Steve Singledecker, LANL Waste Management Services Group Leader, at (505) 665-5516; and Frank Tarantello, Director of Performance Assurance, EnergySolutions Government Services in Los Alamos, at (505) 663-7238.

3. Additional detail demonstrating that LANL does not have an approved on-site RCRA facility capable of opening the FTWCs containers for repackaging and additional characterization (if required for off-site shipment). This information is required in order

for NMED to issue a Temporary Authorization to process the FTWCs at Technical Area (TA) 16.

If LANL ultimately is unable to ship the five containers to off-site facilities in their current form, there may be no choice but to open and characterize and/or repackage them on-site in order to render them acceptable for shipment and disposal. LANL anticipates it would be able to ship these four containers to off-site facilities, as soon as these issues have been resolved and they can be transported in compliance with the applicable DOT requirements.

However, LANL currently has no operational on-site facilities that are authorized to open these containers for repackaging or additional characterization. The RCRA-permitted facility at TA-54 lacks the engineering controls or Authorization Basis approval that would be needed to open these containers. Likewise, the RCRA-permitted facilities at TA-3-29, TA-55, and elsewhere lack the engineering controls or Authorization Basis approval that would be needed to open these containers. One facility at TA-16 generally has the engineering controls needed to handle tritium material, but its Authorization Basis to operate is not yet approved, and it has no RCRA-permitted units able to store the waste for processing. [see section 4 below for additional detail.]

4. Reasons why the TA-16 Authorization Basis change may not be approved until October 2016, as well as the reasons for waiting until May 2017 to request a Temporary Authorization.

The general process for approving and modifying the Authorization Basis for DOE nuclear facilities such as the Weapons Engineering Tritium Facility (WETF) at TA-16 is outlined in a number of DOE Orders and associated documents, including DOE O 425.1B (*Startup and Restart of Nuclear Facilities*), which are available at www.energy.gov. The timeline for approval of the DOE/NNSA Authorization Basis for WETF presented in LANL's September 4, 2013 STP extension request was conservative (as requested by NMED), and was based on the events and progress made up to that point in time. Progress made since then has allowed LANL to move the anticipated date for Authorization Basis implementation up to May 2014, at which time LANS can begin/resume standard operations at WETF.

However, high-activity mixed waste segregation activity in TA-16 is a special high hazard activity that is not part of the Authorization Basis process for startup of normal WETF operations that is currently ongoing. The segregation activity for the LA-W934 items will require a separate Authorization Basis approval process once the necessary equipment has been designed and installed.

LANL believes that engineered equipment for remote handling will be necessary to safely handle this high activity mixed waste. LANL has approached the University of New Mexico for assistance in design of a robotic remote handling system, but the project has not yet commenced. The remote handling equipment would have to be developed, tested and validated off-site before installation at WETF is considered. These activities associated with the high activity mixed wastes, including implementation of the engineered equipment for remote handling, then would need to be incorporated into the safety and authorization basis of the facility, subject to DOE/NNSA approval.

Once approved, the engineered equipment would be installed and must undergo DOE/NNSA readiness review and acceptance before use. This overall process is likely to extend into CY 2017.

The September 4, 2013 extension request timeline was also based partly on allowing time for development and NMED approval of a RCRA Temporary Authorization. A Temporary Authorization would be required in order to open and repack the high activity tritium mixed waste containers at the WETF facility, since WETF currently does not have a permitted RCRA storage unit. In order to accurately describe in the Temporary Authorization application the facilities and the waste operations to be performed, along with the processes and engineering controls to be utilized in these activities, LANL could not reasonably prepare and submit an approvable Temporary Authorization request to NMED until equipment has been installed, procedures are developed, and the DOE/NNSA Authorization Basis modification process is well underway.

Based on all these considerations, LANL believes the overall timeline presented in the September 4, 2013 STP extension request is justified. NNSA/LANS emphasize that while these efforts are being made to address the high activity mixed waste, WETF is continuously working to reduce its legacy inventory of radioactive material under the accepted authorization and safety basis. At the same time, every effort is being made to continue seeking options for offsite treatment and disposal without segregation and repackaging if at all possible.

5. Provide the exact location (i.e., which permitted unit(s) at TA-54) where the subject waste containers are currently stored.

All five containers are currently stored in TA-54-1028 at TA-54, Area G.

6. If the containers are stored at Area G, they will need to be moved in 2015 in order to begin closure of Area G in accordance with the Consent Order. Discussion of where the containers will be stored once closure of Area G begins.

Should it ultimately be necessary to repack the containers at TA-16, it is unknown at this time whether the TA-16 authorization to proceed will be granted before or after the date of final closure of Area G. If it occurs after the date of final closure of Area G, the containers will be relocated to another RCRA-permitted storage unit that is authorized to store this type of high-activity MLLW.

Table ES-1. TSD FACILITIES CONTACTED AND STATUS OF LANL EFFORTS

TSD FACILITY	POINT OF CONTACT	OPTION FOR DRUM No. C00130818 ? <i>[Tritium cryotrap with mercury contamination and very high tritium (up to 50,000 Curies) - requires reacting and recapture or destruction of tritium]</i>	OPTION FOR DRUM Nos. C09203611, C09203612, C09203613, C09203614, C00130818? <i>[Tritiated mole sieve and squib assemblies with very high tritium (up to 50,000 Curies), packaged in FTWCs]</i>
Permafex (including the following TSDs: Permafex of FLA, M&EC in TN, DSSI in TN and PFNW in WA)	Tammy Monday (865-813-1309)	A similar LANL waste container was processed at M&EC in approx. 2010. Segregation/ repackaging/ treatment at M&EC would be possible, contingent upon facility modifications.	A WPF was informally submitted for review. Segregation/ repackaging/ treatment at M&EC would be possible, contingent upon facility modifications.
IMPACT Services, Inc. (Pyrolytic process for DAW)	No POC contacted (researched online as option for future MLLW items)	Filed for Chapter 7 liquidation May 24, 2012 in U.S. Bankruptcy Court. No longer a potential option.	Filed for Chapter 7 liquidation May 24, 2012 in U.S. Bankruptcy Court. No longer a potential option.
Waste Control Specialists (WCS), TX	Sherrod Reavis, Matt la Barge, Kelly Hunter, Trent Riggs, Lisa Berta (972-488-1495)	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].	Waste does not meet current WAC. Could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].
Energy Solutions –Clive, UT	Johnny Bowne (801-557-5211)	Energy Solutions at Clive, Utah, is limited to NRC Class A waste (this is Class C waste). The Clive facility has no intention of pursuing a Class B/C license. Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].	Energy Solutions at Clive, Utah, is limited to NRC Class A waste (this is Class C waste). The Clive facility has no intention of pursuing a Class B/C license. Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].
Energy Solutions--Bear Creek Operations, TN	Johnny Bowne (801-557-5211)	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].
Nuclear Fuel Services (NFS), TN	Norm Jacobs (423-743-2503)	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].
Integrated Environmental Services (IES), TN	Jeff Gold (404-863-8175)	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].
NSSI Sources and Services, Inc., TX	Bob Gallagher, president (713-641-0391)	Possible treatment/recycle options under discussion - contingent upon license and permit modifications. DOE audit status unclear. Audit	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or

TSD FACILITY	POINT OF CONTACT	OPTION FOR DRUM No. C00130818 ? <i>[Tritium cryotrap with mercury contamination and very high tritium (up to 50,000 Curies) - requires reacting and recapture or destruction of tritium]</i>	OPTION FOR DRUM Nos. C09203611, C09203612, C09203613, C09203614, C00130818? <i>[Tritiated mole sieve and squib assemblies with very high tritium (up to 50,000 Curies), packaged in FTWCs]</i>
		and LAFO approval needed for exception to DOE 435.1.	changes to their RCRA Permit and NRC license [not a feasible option].
Lawrence Livermore (LLNL), CA	Charlie Hunt (925-422-3813)	Not Permitted for treatment of hazardous waste.	Waste could not be accepted for treatment/ disposal without building a special facility, and obtaining necessary exceptions or changes to their RCRA Permit and NRC license [not a feasible option].
National Nuclear Security Site (NNSS), NV	R. Gregory Geisinger, Radioactive Waste Acceptance Program Manager (702-295-5196)	Would be likely to meet NNSS-WAC after <u>repackaging</u> [to reduce tritium content] and <u>LDR treatment</u> of mercury	All FTWCs WPF documentation has been formally submitted to NNSS on July 15, 2013 for acceptance of waste as <u>currently packaged</u> . It will not be reviewed by NNSS until after MLLW certification is granted to the LANL NNSS Program; however, until corrective actions are completed, NNSS has suspended review of all LANL waste profiles. The formal NNSS review of the FTWC WPF is expected to occur in February 2014.