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Date: December 20, 2013
Refer To: WM-DO-13-0095
 LAUR: 13-29552

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 for Amendment of Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO) to Extend Site Treatment Plan (STP) Compliance Milestone for Activity 3.3.4

The purpose of this letter is to request a 90-day extension to the Compliance Plan milestone in the Site Treatment Plan (STP) for shipment of the 10-100 nCi/g waste (LA-W935). The U.S. Department of Energy/National Nuclear Security Administration (DOE/NNSA) and Los Alamos National Security, LLC (LANS) (DOE/LANS; collectively "the Respondents") hereby request an amendment to the STP that proposes a revised compliance date of April 16, 2014 for this activity. The previously-approved compliance date of December 31, 2013 was extended to January 16, 2014 by the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) by letter dated November 15, 2013. The following sections address the requirements of FFCO Section XI.B. 2 (OTHER AMENDMENTS TO THE STP).

a. Detailed description of the proposed amendment.

STP Activity 3.3.4 currently requires that LANL complete shipment of existing waste to an offsite facility for treatment, or complete parallel options, by 12/31/13 (per Table 3.3.4-2). By this letter, the Respondents seek a 90-day extension of the due date, to April 16, 2014. The extension would affect only two (2) oversized boxes, which account for 45.8441 m³ of the 201.4007 m³ of waste in this treatability group. To date, LANL has shipped 144.8624 m³ of the 201.4007 m³ of waste in this treatability group. The Respondents did not request additional time in their November 7, 2013



letter; but subsequently, the Respondents have determined that the two remaining boxes cannot be shipped off-site in their current configuration before the January 16, 2014 compliance date.

b. Rationale for the proposed amendment.

The two oversized boxes in question contain gloveboxes that are classified as mixed low level waste (MLLW) and therefore must be shipped to an off-site permitted treatment, storage and disposal facility (TSDF). In order to meet the off-site TSDF's Waste Acceptance Criteria (WAC), the oversized boxes must be opened and checked for items that do not conform to the facility's WAC. Because the windows in the gloveboxes are no longer intact, they can only be opened and processed safely in a box-line facility. Unfortunately, the two box line facilities at LANL are currently being utilized entirely for the 3706 Campaign.

Additionally, the two oversized boxes in question do not meet Department of Transportation (DOT) shipping requirements and must be overpacked into DOT-compliant containers. These boxes will not physically fit in any existing LANS DOT container without being size-reduced, which must also occur in one of the two LANL box line facilities. As stated above, the two box line facilities are completely committed to the 3706 Campaign.

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

The LANL box line facilities are fully committed to the 3706 Campaign until March, 2014. The Respondents' current understanding is that the 3706 Campaign is one of the Governor's highest environmental priorities. DOE/NNSA and LANS did not want to risk missing a 3706 Campaign goal (and the Governor's priority) to process these two oversized boxes. Additionally, these two boxes will require size-reduction prior to repackaging.

Due to the box lines being 100 percent committed to the 3706 Campaign through March of 2014, and the length of time required to safely size-reduce these two boxes, the Respondents hereby request an extension of the milestone date for shipment of the two remaining 10-100 nCi/g waste items to April 16, 2014.

d. If the proposed amendment 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.

It is DOE/LANS' intent to process these two STP boxes immediately after the completion of the 3706 Campaign. As stated above, the box lines will be 100 percent committed to the 3706 Campaign during every operating hour from now through March of 2014. The Respondents will promptly notify NMED-HWB in the event of any unforeseen obstacle that might result in a further delay in performance.

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

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implementation of the Site Treatment Plan for LANS and for DOE/NNSA, that to the best of our knowledge and belief, the information in this document is true, accurate, and complete.

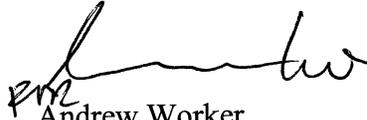
If you have any questions, please contact Monica Noll at (505) 667-5999 or Andrew Worker at (505) 606-0787.

Sincerely,



Monica D. Noll
STP Project Manager
Waste Management Programs (WM-PROG)
Los Alamos National Security, LLC

Sincerely,



Andrew Worker
STP Project Manager
Los Alamos Field Office
National Nuclear Security Administration

MDN:AW/lm

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