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Area 54 TA-54
TWISP

Los Alamos National Laboratory

Hazardous and Solid Waste (ESH-19)
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Date: November 20, 2000
Refer to: ESH-19-00:0101

Mr. James Bearzi
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. Bearzi:

**SUBJECT: FOURTH QUARTER PROGRESS REPORT (2000) FOR
CONSENT AGREEMENT FOR COMPLIANCE ORDERS
NMHWA 93-01, 93-02, 93-03, and 93-04**

The purpose of this letter is to submit the Department of Energy/Los Alamos National Laboratory Fourth Quarterly Progress Report (2000) for the Transuranic Waste Inspectable Storage Project (TWISP) at Technical Area 54, Area G. This report is required by Section IX.C of the December 10, 1993 Consent Agreement between the Department of Energy (DOE), the University of California (UC) and the New Mexico Environment Department (NMED).

The enclosed report addresses activities related to the TWISP during the reporting period of August 1, 2000 through October 31, 2000. The following elements, as required by the referenced Consent Agreement, are addressed in the report:

- I. A brief description of activities completed during the reporting period to implement the requirements of the Consent Agreement.
- II. A brief description of activities scheduled for the following reporting period.
- III. A description of any change in key project personnel that occurred during the reporting period.
- IV. A description of problems encountered during the reporting period and mechanisms used or proposed for resolving the problems.
- V. Information summarizing all data, sampling, and test results for the period.



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Mr. James Bearzi
ESH-19:00-0101

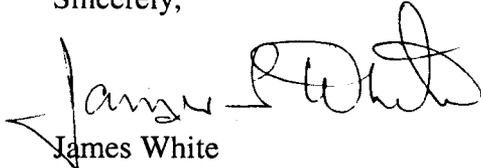
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November 1, 2000

The TWISP Project is enthusiastic about the progress made to date. We will continue to keep you apprised of the progress in accordance with our agreement. If you should have any questions, please feel free to contact me at (505) 665-5042.

JW/SF/vh

Sincerely,



James White
Group Leader, ESH-19

Enc. a/s

Cy: w/enc., Debby Brinkerhoff
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
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**TRANSURANIC WASTE INSPECTABLE STORAGE PROJECT
FOURTH QUARTER PROGRESS REPORT (2000)
AUGUST 1, 2000 through OCTOBER 31, 2000**

The Transuranic Waste Inspectable Storage Project (TWISP) was initiated in May 1993 in response to the New Mexico Environment Department's (NMED's) Consent Agreement for Compliance Order's NMHWA 93-01, 93-02, 93-03, 93-04. The TWISP involves the recovery of approximately 16,865 TRU and TRU-mixed waste containers currently under earthen cover on Pads 1, 2, and 4 at Technical Area (TA)-54, Area G, and placement of that waste into inspectable storage. All waste will be moved into inspectable storage by September 30, 2003. Waste recovery and storage operations will emphasize protection of worker safety, public health, and the environment.

I. Activities accomplished during the period August 1, 2000 – October 31, 2000

1. Summary

- The Drum Venting System (DVS) remains fully operational.
- The following procedures were developed, trained to, and implemented:
 - 1) Operations of the Remote Drum Venting Device
 - 2) TWISP Standing Orders
 - 3) Changing Gloves on a Glove Box
 - 4) Changing Glass on a Glove Box
 - 5) Changing HEPA Filters on a Glove Box
 - 6) Operating the MART Drum Washers
 - 7) Maintenance of the MART Drum Washers
- Real-time Radiography (RTR) of TWISP drums continues.
- TWISP successfully completed a Management Self-Assessment (MSA) for Pad 2 retrieval.
- TWISP successfully completed a contractor Readiness Assessment (RA) for Pad-2 retrieval.
- TWISP has fully implemented the Basis for Interim Operations (BIO) document
- TWISP retrieved 76 drums from Pad 2.
- TWISP retrieved 8 fiberglass reinforced plywood boxes (FRPs) from Pad 2.

2. TWISP Facility Construction

- In accordance with the TA-54/FMU-64 Storm Water Pollution Prevention Plan and the recent revision to the TWISP Remedial Action Plan (RAP-2000), storm water run-on/runoff controls were upgraded to include the Pad 2 retrieval site.
- Construction of a new dome (TA-54-375) for storage of retrieved TWISP containers is complete. Efforts to obtain a RCRA storage permit for this structure continue.

3. Drum Venting System

- The Drum Venting System (DVS) remains operational. The TWISP project continues to procure spare parts for the DVS. The system engineer continues to evaluate ways to optimize operation of the system.

4. Equipment Purchasing

No new equipment was purchased during the fourth quarter (2000).

5. Update on Waste Verification Facilities

No new waste characterization processes or facilities during the fourth quarter (2000).

6. RCRA Permit Application Activities

NMED's final approval of RCRA permit modifications for TWISP and supporting operations remains on the critical path for the project. No date has been provided by NMED for completion of that review.

In April 1998, October 1998, and January 1999 LANL submitted Los Alamos National Laboratory's General Part A Permit Application (Revision 0.0), General Part B Permit Renewal Application (Revision 1.0), and Technical Area 54 Part B Permit Renewal Application, respectively. These documents work together to meet the requirements of the New Mexico Administrative Code, Title 20, Chapter 4, Part 1, Subpart IX, §§ 270.10(h), 270.30(b), and 270.50(a), as revised January 1, 1997, regarding the duration of and reapplication for hazardous waste permits. TWISP operations have been specifically addressed in these documents.

II. Activities scheduled for the period November 1, 2000 through January 31, 2000

- Retrieval of waste at Pad 2 will continue.
- Drum washing operations will continue.
- Drum venting operations will continue.
- Environmental surveillance of the TRU Pad area will continue.
- Work will continue at the waste verification facilities.
- RTR will continue.
- Maintenance of storm water runoff control measures will continue during retrieval operations at Pad 2.

III. Changes in personnel during the period August 1, 2000 – October 31, 2000

No changes in personnel during the fourth quarter (2000).

IV. Problems encountered during the period August 1, 2000 – October 31, 2000

- The program and resource priority demands associated with the Cerro Grande Fire recovery effort have had a major impact to the start-up of retrieval operations at Pad 2.
- The Basis of Interim Operations document took longer than anticipated to complete.

V. Monitoring during the period August 1, 2000 – October 31, 2000

Continuous Air Monitoring is ongoing in Domes 54-229, 54-230, 54-231, and 54-232 (Waste Storage Domes), Dome 54-33 (Drum Prep Facility), and during Pad 2 Retrieval Operations. No elevated readings above action limits have been detected.

Direct Penetrating Radiation (DPR) monitoring conducted at the Area G perimeter is ongoing using Electret Ion Chambers (EICs). In addition, LANL continues the use of Thermo Luminescent Dosimeters (TLDs) for Consent Agreement Monitoring.