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Date: June 15, 2000
Refer to: ESH-19:00-052

Mr. John E. Kieling, Program Manager
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New Mexico Environment Department
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RECEIVED 2000

Dear Mr. Kieling:

Subject: Draft Response to the Request for Supplemental Information (RSI) for the October 1998, General Part B Permit Application, Revision 1.0 Los Alamos National Laboratory (LANL) EPA I.D. NM0890010515

The purpose of this letter is to provide copies of a draft version of the LANL response to the RSI referenced above. This copy is being provided as preliminary information for discussion purposes associated with the review activities of the Permit Working Group (High Performance Team). Lee Winn, of your staff, requested the submittal of this draft on April 27, 2000.

This copy of the RSI Response is subject to further review and potential modification before the final version is submitted. Substantive effort has been made to provide the anticipated substance of the responses to individual comments contained in the RSI but the exact version of the final answer or discussion cannot be guaranteed. The sole purpose of this submittal is to informally assist in the discussion and timely resolution of these issues for the purposes of the Permit Working Group.

This version of the Response does not contain the attachments that will be included with the final version. The attachments are currently in review, are bulky, and provide detail that may not be necessary for the discussion purposes of the working group. If necessary, they can be requested and arrangements made for their production.

If you should have any questions or concerns regarding this submittal, please feel free to contact me at 665-0677 or Gian Bacigalupa at 667-1579.

Sincerely,

James L. White
Group Leader

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ATTACHMENT A
Request for Supplemental Information
For the October 1998, General Part B Permit Application, Revision 1.0
Los Alamos National Laboratory (LANL) EPA I.D. NM0890010515

Specific Comments:

Appendix F - Closure Plan

1. Section F.1.9. "If decontamination to establish cleanup levels is not achievable, LANL will amend this closure plan to address appropriate closure procedures or post-closure care requirements pursuant to 20 NMAC 4.1, Subpart V, 264.117 through 264.120 [1-1-97]." LANL should provide, (in applicable technical-area specific chapters), a written post-closure plan for all land-based units pursuant to 20 NMAC 4.1, Subpart V, §270.14(b)(13) to comply with subparts F, K, L, M, N, and X.

Response:

LANL proposes that Appendix F, "Closure Plan," of the General Part B be deleted. This proposal is in response to Permit Working Group (PWG) discussions held with the Hazardous and Radioactive Materials Bureau (HRMB) on May 5, 2000. The closure plan in the appendix was originally written and intended to provide a reference point for common LANL closure procedures such as sampling and analytical procedures, decontamination goals, and, as discussed in this comment, post-closure plans and procedures. This approach was consistent with the preliminary permit format strategy discussed between HRMB and LANL that suggested a common reference source in LANL permit applications for such facility-wide procedures (Letter, "Proposed Permit Strategy," to Dr. John Browne, LANL, and David Gurulé, U.S. Department of Energy, from Robert S. Dinwiddie, Hazardous and Radioactive Materials Bureau [HRMB], February 5, 1998). This approach also was to allow keeping TA-specific closure plans relatively shorter and less redundant.

The concern has become that this strategy may result in TA or unit specific closure plans that cannot be used as discrete documents and that may require permit-wide modifications as closure activities progress. As discussed, the procedures and references now contained in the General Part B can be moved to the closure plans contained in the TA-specific permit applications, making them comprehensive documents.

The post-closure requirements referenced by this comment can be addressed in the applicable TA-specific closure plans with a combination of a previously submitted proposed text change for the General Part B permit application and an additional revision. In response to previous discussions with HRMB staff, LANL submitted a proposed change to this section that included requirements for specific post-closure related documentation items such as survey plats. The submittal was sent to NMED on December 3, 1999, and was titled "Resource Conservation and Recovery Act (RCRA) Permit Application Revision Request - Los Alamos National Laboratory (LANL) General Part B Permit Application - LANL Hazardous Waste Facility Permit No. NM0890010515-1". The proposed language also provides a statement that LANL anticipates clean closure procedures for container storage and treatment units rather than post-closure plans. In answer to this comment, the following sentence will also be added: "In the event that the closure decontamination standards cannot be met and an alternate demonstration of decontamination is not proposed or approved, LANL will prepare a post-closure plan for the storage or treatment unit. An example of the complete text of this proposed revision is available as Attachment _ of this document. The example revised closure plan**(s)** are included in "clean" format for substitution into the TA-16 Part B permit application as the companion TA-specific portion of this phase of the permit renewal and in "bold/strikeout" format for information.

For land-based units (i.e., landfills, surface impoundments, waste piles, and land treatment units), LANL will provide a written post-closure plan in TA-specific permit applications, permit modification requests, or

permit renewal documents. The schedule for these submittals has not been resolved with the HRMB at this time. An example of this approach is the submittal of the TA-54, Area L, inactive surface impoundment and storage shaft closure/post-closure application.

Appendix B - Waste Analysis Plan [WAP]

Section B.1.1 Facility Waste-Generating Processes and Activities

2. Section B.3.1.1 Acceptable Knowledge. The last bullet on the top of page B-25 seems to misquote the guidance. "Wastes containing heterogeneous materials, where the physical nature of the waste does not lend itself to taking a representative sample (e.g., laboratory trash and construction debris with surface contamination.)" There is no mention of "trash" in the quoted guidance. LANL should revise this statement.

Response: The parenthetical reference to the 1994 EPA WAP guidance at the end of the bulleted item was intended to provide a source citation for the entire section of acceptable knowledge examples rather than a specific reference restricted to the heterogeneous material item. The intention of this section can be made clearer if the citation is moved to the beginning of the paragraph. The examples have also been modified to incorporate the guidance we were given in the PWG meeting of April 27, 2000 that any additions to the WAP guidance were to be deleted. The additional changes and examples were originally added to provide more specificity regarding LANL waste management operations.

Incorporating these changes, LANL proposes the following language:

"Examples presented in the EPA guidance (EPA, 1994) for the appropriate use of acceptable knowledge include:

- Hazardous constituents in wastes from specific processes are well documented, such as with F-listed and K-listed wastes.
- Wastes are discarded unused commercial chemical products, reagents or chemicals of known physical and chemical constituents.
- Health and safety risks to personnel would not justify sampling and analysis (e.g., radioactive mixed waste).
- Physical nature of the waste does not lend itself to taking a laboratory sample."

3. Section B.3.1.1.1 Process Knowledge. The process knowledge described in this permit application reflects what is called Supplemental Process Knowledge in the WIPP permit. In order to be consistent, for all waste subject to the WIPP permit referenced in number 9 below, the process knowledge section should be changed in the permit application to reflect process knowledge as identified in the WIPP permit.

Response:

The term "supplemental" is used in two different contexts when described in Section B4-2c of Attachment B4 of the WIPP permit and in the Appendix B WAP of the LANL General Part B. As discussed in the WIPP permit (B4-1 Introduction, and B4-2c Supplemental Acceptable Knowledge Information), the term is used to generally describe both methods of analysis and other sources of information that can be used for MTRU waste characterization using acceptable knowledge. The example list of potential supplemental information sources supplied in Section B4-2c indicates a variety of process documentation sources. The introduction to the attachment also includes analytical methodology such as radiography, visual

examination, headspace gas sampling, and homogeneous waste sampling and analysis as "supplemental" sampling and analytical data sources.

The term "supplemental" waste analysis data as used in the LANL General Part B WAP (Section B.3.1.1.2) was originally intended to illustrate the distinction between approved sampling and analysis methodology (e.g., SW-846 methods) and other analytical data that could be used for acceptable knowledge waste characterizations. The LANL WAP is required to cover waste characterization activities for hazardous and mixed low-level waste in addition to the MTRU characterization program. Acceptable knowledge sources were broken down into process knowledge, supplemental waste analysis data, and other facility records of analysis as indicated by the EPA guidance. The description used supplemental waste analysis data to include the potential to use other, less rigorous but adequate, analytical data for waste characterization. An example could be qualitative parameters such as color and phase, or the use of screening procedures such as pH test papers. The use of analytical data from the testing of surrogate materials was also included in this category. As such, the intent was to describe a type of acceptable knowledge rather than define acceptable knowledge as a supplement to approved analytical methodology.

In the interests of resolving the discrepancy between the WIPP and LANL uses of the term "supplemental," LANL proposes replacing the word with the phrase "additional characterization data." The existing definition of supplemental waste analysis data in Section B.3.1.1 of the General Part B WAP will be replaced with "Additional characterization data includes data obtained from chemical or physical analysis or review that is not subject to RCRA protocols such as "Test Methods for Evaluating Solid Waste, Physical/Chemicals Methods" (SW-846) and other approved methods, or through testing of similar or surrogate wastestreams." The title of Section B.3.1.1.2 of the General Part B WAP will be changed to "Additional Characterization Data." The first sentence of that section will be replaced with: "Additional characterization data used for acceptable knowledge includes information for the waste stream provided by the generator that may be qualitative in nature, not be subject to an approved quality control program, or performed on a similar waste stream." The supporting notes in the eighteen waste stream and analytical parameter tables of the WAP will also be changed.

4. Section B.2.1 Proposed Analytical Parameters and Methods (page B-21). For consistency within the permit, the acceptable knowledge criteria for all waste streams should be the same as the acceptable knowledge criteria for mixed TRU waste characterization (including the revisions to process knowledge in number 3 above).

Response:

Because the LANL General Part B WAP is designed to be inclusive of characterization data for hazardous and mixed low-level waste types in addition to mixed TRU waste and because this is a general listing, the list includes but is not intended to be consistent with the parameters of the mixed TRU waste characterization program. The incorporation of the headspace gas sampling, RTR, and visual examination items under one mixed TRU waste characterization item is proposed to clarify this context. An additional item has also been added to incorporate the additional characterization data discussion as included in the response to Comment 3.

5. Section B.3 Characterization Procedures. Page B-22. LANL should include characterization procedures for the solidification/cementation treatment process.

Response:

There are currently two cementation treatment processes at LANL and specific waste characterization procedures for these units are or will be discussed in the waste analysis plans (WAPs) included in their appropriate TA-specific permit applications. These include the TA-50, Building 1, Room 60A cementation

unit included in the "Los Alamos National Laboratory Technical Area 50 Part B Permit Renewal Application, Revision 1.0, January 1999" and the TA-55, Building 4 cementation unit in the permit application now in development. The WAPs in the TA-specific permit applications reference appropriate waste characterization procedures for the site-specific treatment processes and this is consistent with the format supporting the permit development strategy (as described in the HRMB letter referenced in Comment 1)

The sentence that states "The waste analysis information contained in this WAP is specific to storage in containers and tanks, and treatment by open burning (OB), open detonation (OD), and stabilization (cementation)" on page B-1 of the Appendix B WAP in the General Part B can be revised for clarity. The WAP contains descriptions of facility-wide procedures that may be used for all or as a starting point for the described waste characterization and documentation activities. LANL proposes modifying this and the following sentence to read:

"The waste analysis information contained in this WAP is used for waste characterization of wastes managed in containers and tanks, and may be used for information supporting treatment by open burning (OB), open detonation (OD), and stabilization (cementation). Waste analysis plan requirements specific for other types of storage or treatment and for additional operation specific waste characterization procedures will be developed and submitted in Attachment B of technical area (TA)-specific permit applications, permit modification requests, or permit renewal documents."

6. Section B.3.1.1 Acceptable Knowledge (second bullet on top of page B-25). "(e.g., radioactive mixed waste)", the e.g. meaning 'for example' should be replaced with i.e. meaning 'that is.'

Response:

The list of appropriate acceptable knowledge examples for waste characterization as presented on page B-25 has been modified in response to Comment 2 above. The EPA guidance language is quoted directly. The use of radioactive mixed waste as an example is also consistent with the potentially diverse types of wastes generated at LANL and the subsequently general nature of the waste characterization procedures in the Appendix B WAP. Wastes that contain hazardous constituents in addition to potentially infectious, acutely toxic, or physically hazardous as well as radioactively active components may also require acceptable knowledge characterization procedures for health and safety reasons.

7. Section B.3.1.3 Verification and Reevaluation Frequencies. Page B-29. "Reevaluation of initial characterization information may be performed to verify the accuracy of the initial waste characterization; to verify that applicable treatment standards have been met; when there is a change in a waste-generating process; when the generator requests a review; or when analytical results indicate a change in a waste stream." Because LANL has chosen to describe waste categories rather than waste streams in the permit application, LANL should provide an example of acceptable knowledge documentation for each waste category.

Response:

Example acceptable knowledge waste characterization packages have been provided for each waste stream type described in the General Part B Waste Analysis Plan. These are included in Attachment _ of this document.

8. Section B.3.1.3 Verification and Reevaluation Frequencies. Page B-30. "Hazardous waste received at the waste management unit for storage will be randomly selected for verification by acceptable knowledge or sampling and analysis at a rate of 1 percent of received waste streams characterized by

acceptable knowledge per year." LANL should include in the permit application a discussion the Solid Waste Organization's (SWO's) process for waste verification and non-conformance tracking.

Response:

The waste verification process presented to NMED permit writers during the waste management tour of March 29, 2000, and included in this RSI Response as Attachment _ is a detailed procedure designed to implement the waste verification condition as stated in the WAP. As an SWO document, it is specific to TA-54 Area L and G waste management operations although it applies to the majority of Resource Conservation and Recovery Act (RCRA) regulated waste managed at LANL. As such, we propose that its description be appropriately placed in the WAP section of the TA-54 Part B permit application rather than the General Part B at the time that revisions are prepared in the application review process.

The following additional language is proposed to be included at Attachment B of the TA-54 Part B Permit Application, Revision 0.0, January, 1999:

"B.1, Verification and Reevaluation Frequencies [20 NMAC 4.1, Subpart V, 264.13(a)(3) and 264.13(b)(4)]

Hazardous and mixed waste received at TA-54 is verified in accordance with Section B.3.1.3 of the waste analysis plan in Appendix B referenced above. Hazardous and mixed low-level waste samples are selected for verification sampling and/or visual inspection procedures as part of a program to confirm that acceptable knowledge applied under generator waste certification programs adequately characterizes the waste for storage. The program is designed to meet the verification random sampling frequency contained in Section B.3.1.3 of the General Part B but may require additional sampling of wastestreams as a result of other programmatic requirements such as waste acceptance non-conformance investigation or off-site pre-shipment checks. The verification program is performed in accordance with TA-54 procedures including sample identification, documentation, collection, shipping, recordkeeping, and quality assurance. Mixed transuranic wastestreams received or stored at TA-54 are verified in accordance with the Waste Isolation Pilot Plant (WIPP) Waste Certification Program as described in Section B.3.2 of the General Part B."

9. Section B.3.2 Mixed TRU Waste Certification Plan (page B-31, second paragraph). "Because these references are subject to change as new information is provided, developed, or approved, and because LANL is not subject to their requirements in LANL's operating permit for storage, but rather utilizes them as waste management guidelines this WAP will not be modified as ongoing changes to the referenced documents occur." If this is the case, then LANL should make sure the correct documents are referenced in this permit application. Please refer to the "Hazardous Waste Facility Permit issued to the Waste Isolation Pilot Plant EPA No. NM4890139088, October 27, 1999."

Response:

LANL has included this and other appropriate updated citations as indicated by this RSI. A complete list of the revised citations includes:

- Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit, NM 4890139088, November 26, 1999.
- Waste Acceptance Criteria for the Waste Isolation Pilot Plant, U.S. Department of Energy, (DOE/WIPP-069/Rev. 7, Carlsbad, New Mexico, November 26, 1999.

10. Section B.3.2.1 Mixed TRU Waste Certification Plan (page B-31, third paragraph). "The "Los Alamos TRU Waste Certification Plan" (TWCP) (LANL, 1991) incorporates the certification requirements of the "Waste Acceptance Criteria for the Waste Isolation Pilot Plant" (WIPP WAC) (DOE, 1996b) for mixed TRU waste that will be sent to that site." LANL should insert the phrase 'or most recent version' after the (WIPP WAC) (DOE, 1996b) reference.

Response:

The phrase "or most recent version" has been inserted after the reference. See page __ of the revised WAP, Attachment _ of this document.

11. Section B.2.2.1 Real-Time Radiography (page B-32, first paragraph). "The audio/visual tapes produced during the waste container scan will be maintained for a minimum of three years." LANL should verify that this time period is consistent with the WIPP permit referenced in number 9 above.

Response:

The three year record keeping requirement is not consistent with the WIPP permit requirement. Originally, this language was intended to meet the general document record keeping requirements indicated by 20 NMAC 4.1, §264, Subpart E, "Manifest System, Recordkeeping, and Reporting," and the existing LANL permit (Module II, Section K, "Recordkeeping and Reporting"). The WIPP permit contains additional detailed directions for the retention of waste characterization records at generator/storage sites for mixed transuranic wastes disposed at that facility (WIPP Permit, Attachment B, Section B-4a(7) "Records Management," page B-22) but had not been approved at the time the General Part B WAP was written.

LANL proposes that the following language should be added to the end of Section B.3.2, "Mixed TRU Waste Characterization" of the General Part B in an effort to make the record keeping requirement for the MTRU waste characterization program consistent with the WIPP permit. Adding the language to this section of the WAP will also make the requirement applicable for all types of MTRU WIPP waste characterization data rather than restrict it to RTR:

"LANL shall prepare a records inventory and disposition schedule (RIDS) or an equivalent system for all waste characterization data and related QA/QC records for MTRU waste to be shipped to the WIPP facility. These documents will be designated as Lifetime Records or Non-Permanent Records as defined by the RIDS and Table B-7 of the WIPP permit. Lifetime Records shall be maintained for the life of the LANL MTRU waste characterization program plus six years and then offered to WIPP or the appropriate Federal Records Center for permanent archival. Non-Permanent Records shall be maintained for ten years after the date of record generation and then disposed according to the RIDS."

With the addition of this language, the audio/visual tape requirement sentence referenced in the comment should be deleted from Section B.3.2.2.1. The phrase "In addition," should also be deleted from the following sentence regarding an RTR data form.

12. Section B.2.2.1 Real-Time Radiography (page B-33, fourth paragraph). The referenced "TRU Waste Characterization Sampling and Analysis Methods Manual" (DOE, 1996c) is no longer the acceptable reference since the WIPP permit has become effective. LANL should provide the correct reference for this procedure from the WIPP permit referenced in number 9 above.

Response:

LANL proposes the replacement of the reference for "...Procedure 310.1, Physical Waste Form Characterization Using Radiography, "TRU Waste Characterization Sampling and Analysis Methods Manual" (DOE, 1996c)." at the end of Section B.3.2.2.1 "Real Time Radiography." The reference has

been changed to "...Attachment B-1, "Waste Characterization Sampling Methods," Section B1-3, "Radiography," (DOE, ___)."

13. Section B.3.2.2.2 Visual Examination (page B-34, last paragraph). LANL references the WIPP QAPP that has been removed from the approved WIPP permit. LANL should refer to the correct documents (i.e., the WIPP QAPD, WAC, and Permit WAP).

Response:

LANL proposes the replacement of the reference for the WIPP QAPP at the end of the sentence starting "The basis for the determination..." The reference has been changed to "the WIPP Permit, Attachment B2, "Statistical Methods Used in Sampling and Analysis," Section B2-1 (DOE, ___)." The reference to the WIPP QAPP at the end of the sentence starting "The selection process will be updated..." should also be changed to the "WIPP permit, (DOE, ___)."

14. Section B.4 Off-Site Waste Acceptance Procedures. The guidance document Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes (OSWER 9938.4-03, April 1994), suggests that TSDFs receiving wastes from an off-site generator (or other facility), require a submittal of a Waste Profile Sheet (or comparable document) to the TSDF as a pre-acceptance condition. LANL failed to mention this form in their documentation requirements for off-site waste acceptance.

Response:

Section B.4, "Off-Site Waste Acceptance Procedures," of the General Part B WAP, page B-42, states that LANL's "routine waste characterization documentation" will be obtained from the generator and reviewed for LANL waste acceptance procedures. This general language was submitted with this WAP to reduce the need for permit modifications and to simplify the determination of the appropriate document for compliance purposes as LANL waste profile forms evolve in response to changing regulatory requirements and waste management operation program needs. Based on LANL's operational history, further revisions of the WPF will occur and will be stringently reviewed to determine that they correctly reflect the regulatory conditions in effect at the time of revision. For informational purposes, the current LANL Waste Profile Form (WPF) is included for review in Attachment __.

15. The above referenced EPA guidance also states that: "The shipment received on site should be sampled and analyzed to the extent necessary to verify that it meets permit specifications and regulatory requirements. ...This may be accomplished by performing a systematic process of screening and analysis that allows for monitoring key indicator parameters. In some cases, however, more stringent waste analysis may be required." This application states that LANL intends to examine the waste for things such as pre-shipment inspection and physical examination for correct documentation once waste is received, but there is no mention of systematic analysis that allows for monitoring for prohibited items under the DOE WIPP WAC. LANL should address this oversight. LANL should also include a flow diagram for incoming waste shipment procedures.

Response:

Previous permit modifications to Section II.B.2. "Off-Site Wastes," of the 1989 LANL hazardous waste facility permit have been designed to simplify the addition of sources for off-site waste on a waste generation type basis. This has been done in consultation with the HRMB permit section and has resulted in Table 2-1 for off-site generated LANL Environmental Restoration site wastes and Table 2-2 for LANL generated waste and residual waste sent back from off-site treatment facilities. The strategy provides a mechanism that allows NMED review and approval of each potential off-site source as it is requested

without the need for an extensive revision of the existing permit language. Each change to the permit condition is subject to the appropriate regulatory and public review as indicated by the stated requirement for a formal permit modification at the end of the permit condition. Details of the waste and facility have been included with each permit modification request or application.

With this submittal, LANL is requesting a general category of off-site waste acceptance although the described facilities for off-site waste in the proposed Table 2-3 and supporting language is currently limited to mixed transuranic waste from Sandia National Laboratory (SNL). If approved, Table 2-3 can be used to simply include future off-site waste generating facilities as they are requested through permit modifications. Therefore, the general off-site waste acceptance discussion in the first part of Section B.4 of the General Part B WAP is appropriate for the range of potential waste types (hazardous, mixed low-level, and mixed transuranic) the revision is designed to provide a permit mechanism for. The section goes on to describe the additional characterization procedure for mixed TRU waste characterization for WIPP disposal and the WIPP QAPP reference has been updated to the WIPP WAP in Attachment __.

A flow diagram for off-site waste acceptance procedures incorporating the procedures discussed in Section B.4 has been developed and is included with this document as Attachment _ for information purposes.

16. Supplement 6-Off-Site Waste Information (Introduction, page 6-1, first paragraph). "This supplement provides descriptions of hazardous or mixed waste streams proposed to be received from off-site facilities by waste management...." LANL should remove the reference to hazardous waste in this sentence. LANL is not requesting a permit to receive hazardous waste from off-site.

Response:

As stated in the response to Comment 15, LANL does foresee the potential need to accept hazardous and mixed waste from off-site generators and intends to submit future permit modification requests when appropriate. The basis for the statement in the supplement was to propose that Supplement 6 would be available for additional wastestream descriptions for other facilities if that became necessary prior to the approval of the permit supported by this application. That circumstance has not occurred and the introductory paragraph has been modified to be specific to the described SNL wastes.

The words "hazardous or" have been removed from the first sentence in Supplement 6. The revised supplement is included in "clean" format for substitution into the General Part B and in "bold/strikeout" format for information in Attachment _ of this document.

17. Supplement 6-Off-site Waste Information (Los Alamos National Laboratory Waste Acceptance Procedures, page B-3, second paragraph). "The generator waste documentation will be collected and reviewed for completeness prior to shipment using LANL routine waste characterization procedures as described in this General Part B WAP." LANL should review for completeness by comparing to the WIPP WAP, not the General Part B WAP.

Response:

The WIPP WAP defines the acceptance conditions for mixed transuranic waste as previously certified to that facility's disposal requirements at the generating sites. As described in Supplement 6, SNL does not possess the appropriate additional confirmational capability (e.g., headspace gas sampling) to meet WIPP certification procedures. The waste will be transported to LANL and managed for the purpose of efficiently meeting the full conditions of the WIPP program without the need for additional facilities at SNL. As stated on page 6-4 of Supplement 6, the initial generator characterization will be reviewed for its suitability for transportation and storage at LANL waste management units rather than for disposal at

WIPP. This is consistent with the LANL MTRU waste characterization approach as stated in Section B.3.2 of the General Part B. Therefore, we believe the LANL General Part B WAP is the appropriate reference rather than the WIPP procedures because the waste information will be reviewed for transportation and LANL storage requirements rather than to meet the full WIPP disposal certification program.