

SNL 2002



**Department of Energy  
National Nuclear Security Administration**

**Albuquerque Operations Office  
Office of Kirtland Site Operations  
P.O. Box 5400  
Albuquerque, New Mexico 87185-5400**

DEC 06 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James Bearzi, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Dr. East, Bldg 1  
Santa Fe, NM 87505

Dear Mr. Bearzi:

The purpose of this letter is to request an extension to the 60-day response deadline specified in Notice of Deficiency (NOD) HWB-SNL-02-002.

On October 15, 2002, the U.S. Department of Energy / National Nuclear Security Administration (DOE) and Sandia Corporation (Sandia) received the NOD identified as Task # HWB-SNL-02-002. The Notice of Deficiency includes a set of 524 comments that list the issues DOE/Sandia should address and the additional information that DOE/Sandia should provide to NMED before NMED can make a determination on the administrative and technical completeness of the Comprehensive Part B Permit Request (permit request) for Sandia National Laboratories (SNL).

The NOD provides a deadline of 60 calendar days for providing the information. It also states that the New Mexico Environment Department (NMED) may consider a petition for a deadline extension.

DOE/Sandia are requesting this extension for several reasons:

- The permit request is a complex 5-part document that addresses waste management operations at nine units. The 524 comments address all areas of the request and are so complex and interrelated that Sandia and DOE cannot adequately address them in 60 days. DOE and Sandia also need to clarify some of the more complex comments with NMED staff before responding.
- Three of the nine units in the permit request are used for management of remediation wastes under Sandia's corrective action program: the Corrective Action Management Unit (CAMU) containment cell, the Low Temperature Thermal Desorption Unit (LTTD), and the Temporary Unit (TU). These units are currently operating and are scheduled to

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Mr. J. Kieling

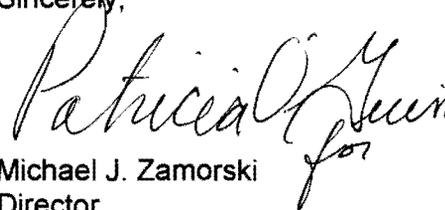
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- complete operations in early 2003. The permit documents for these three units have been or are currently being modified to reflect ongoing operations and upcoming completion and closure. The comments included in the NOD for these units pertain to the permit request submitted in February 2002. In some cases, the comments have been addressed or are currently being addressed through the ongoing modifications of various parts of the permit documents (e.g., the closure plan). DOE and Sandia will be able to provide the most appropriate and meaningful responses to many of the comments after operations are complete, ongoing permit modifications are complete, and closure of the units is underway.
- The upcoming change in status of the CAMU, LTTD, and TU is likely to affect responses to many of the comments that do not directly address these units (e.g., comments on site-wide information). This is due to the complexity of the comments and the permit request. DOE and Sandia will be able to provide the most appropriate and meaningful responses in these areas only after careful consideration of CAMU operations and permit modifications that are underway.
- The building adjacent to the Thermal Treatment Facility (TTF) is currently undergoing renovation. The TTF is currently not operational and is not being modified. However, planned operations at the TTF may change in conjunction with planned operations in the renovated facility. Additional information may be available in early 2003.

DOE and Sandia have developed a schedule for responding to the comments. It is presented in the table in Attachment A.

If you have any questions, please contact John Gould at (505) 845-4428.

Sincerely,



Patricia A. Quinn  
for

Michael J. Zamorski  
Director

Enclosure

Mr. J. Kieling

(3)

cc w/enclosure:

M. Gardipe, ERD

W. Moats, NMED-HWB

J. Parker, NMED-OB

R. Kennett, NMED-OB

D. H. Blanton, SNL, MS 0186, 3000

E. D. Krauss, SNL, MS 0141, 11300

OKSO, Legal File

SNL ISS Records Center, MS 0651, 9612

cc w/o enclosure:

L. West, SNL, MS 1114, 3100

P. Yourick, SNL, MS 1050, 3120

J. Thompson, SNL, MS 1151, 3125

A. Reiser, SNL, MS 1151, 3125

## Attachment A

**Proposed Schedule for DOE/Sandia Response to NMED Comments  
Task # HWB-SNL-02-002**

COMMENT	TOPIC	PROPOSED RESPONSE DATE		
		12/14/2002	2/18/2003	3/31/2003
1-9	Site-wide information		X	
10	Protection of groundwater		X	
11-12	Solid waste management units			X
13-52	Waste analysis plan			X
53-57	Operating and design requirements for ignitable, reactive and incompatible waste		X	
58	Waste analysis plan			X
59-61	Operating and design requirements for ignitable, reactive and incompatible waste		X	
62	Security		X	
63-67	Inspections		X	
68-73	Personnel training		X	
74-90	Contingency plan		X	
91-94	Closure			X
95-110	CAMU design and operations			X
111-126	CAMU treatment standards			X
127-139	CAMU design and operations			X
140-141	CAMU treatment standards			X
142-184	CAMU design and operations			X
185-186	CAMU treatment standards			X
187-191	CAMU design and operations			X
192-208	CAMU waste analysis plan			X
209-213	CAMU contingency plan			X
214-223	CAMU personnel training			X
224-311	CAMU containment cell closure plan		X	
312	CAMU containment cell post-closure care			X
313	CAMU containment cell closure plan		X	
314-319	Alternative to groundwater monitoring for CAMU containment cell			X
319-324	Quality assurance for CAMU containment cell			X
325	Solid waste management units and test sites			X
326	Recordkeeping		X	
327-344	Hazardous Waste Management Facility (HWMF) design and operation		X	
345-347	HWMF container management			X
348	HWMF waste analysis plan			X
349	HWMF operations		X	
350	HWMF security		X	
351	HWMF operations		X	
352-353	HWMF contingency plan		X	
354-355	Thermal Treatment Facility (TTF) document format		X	
356	Solid waste management units and test sites			X
357	Off-site waste accepted for management at SNL			X
358	TTF design		X	

COMMENT	TOPIC	PROPOSED RESPONSE DATE		
		12/14/2002	2/18/2003	3/31/2003
359-370	TTF waste analysis plan			X
371-375	TTF inspections		X	
376	TTF security		X	
377-383	TTF operations			X
384-385	TTF contingency plan		X	
386	TTF soil and vadose zone monitoring			X
387-391	TTF closure and post closure			X
392-398	TTF protection of ground water			X
399-400	TTF air quality assessments			X
401-411	TTF risk analysis			X
412	TTF exposure pathways			X
413	TTF noise			X
414	TTF health and safety			X
415	Waste minimization			X
416	TTF land disposal restrictions			X
417	Radioactive and Mixed Waste Management Facility (RMWMF) waste analysis plan			X
418-424	RMWMF design and operation		X	
425	RMWMF waste analysis plan			X
426-428	RMWMF contingency plan		X	
429-430	RMWMF operations		X	
431	RMWMF container management			X
432	RMWMF design (tanks)		X	
433-439	RMWMF container management			X
440-441	RMWMF closure plan			X
442-443	RMWMF treatment			X
444	RMWMF waste analysis plan			X
445-449	High Bay Waste Storage Facility (HBWSF) design and operation		X	
450-451	HBWSF waste analysis plan			X
452-454	HBWSF contingency plan		X	
455-456	HBWSF operations		X	
457-458	HBWSF closure plan			X
459-463	HBWSF container management			X
464	HBWSF design (tanks)		X	
465	HBWSF waste analysis plan			X
466-469	Auxiliary Hot Cell Facility (AHCF) design and operation		X	
470-471	AHCF waste analysis plan			X
472-474	AHCF contingency plan		X	
475-476	AHCF operations		X	
477-478	AHCF closure plan			X
479-485	AHCF container management			X
486	AHCF design (tanks)		X	
487	AHCF waste analysis plan			X
488-491	Manzano Storage Bunkers (MSB) design and operation		X	
492-493	MSB waste analysis plan			X
494-495	MSB contingency plan		X	
496-497	MSB operations		X	
498-499	MSB closure plan			X
500-504	MSB container management			X

COMMENT	TOPIC	PROPOSED RESPONSE DATE		
		12/14/2002	2/18/2003	3/31/2003
505	MSB design (tanks)		X	
506	MSB waste analysis plan			X
507-508	MSB operations		X	
509-511	Low Temperature Thermal Desorption Unit (LTTD) description and type of unit	X		
512	LTTD potential pathways of exposure	X		
513	LTTD treatment effectiveness	X		
514-516	LTTD prevention of releases	X		
517-518	LTTD monitoring, analysis, inspection, response, and reporting	X		
519	LTTD air emission standards	X		
520-521	LTTD design and operation	X		
522	LTTD contingency plan	X		
523	LTTD recordkeeping	X		
524	LTTD closure plan	X		