

**Subject: Unofficial Comments on Nov 10, 1999 Class 1 submissions**

**Date:** Mon, 21 Feb 2000 11:52:08 -0700

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Here are DRAFT comments on DOE's November 10, 1999 submission of Class 1 changes to the WIPP Hazardous Waste Facility Permit (in WordPerfect 7). These are not EEG's an viewpoint; no one else at EEG has reviewed or approved of them, and they are provided simply as an aid should you be interested in an alternative viewpoint. They are definitely NOT a request to NMED to review the classification applied to them.

Some more caveats. I haven't edited the comments yet. I'm learning RCRA and the Permit as I go, so there may be logical inconsistencies in the opinions expressed. Particularly, I'm confused about what is acceptable as a "typographical error"; a definition of typography would include the "singing" instead of "signing", but not other changes of wording that have been so designated.

I intend (yeah, I'm going down that road) to write up reviews of changes of November 15, Nov. 30, Jan. 7, and Jan 25, too, but I've got a busy schedule the next few weeks (3 audits) so it might be some time before I do so.

Also attached is the January 25, 2000 Item 5 DOE-submitted change that we briefly discussed on the telephone earlier today (converted from PDF format to WP7).

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## General Comments

Changes usually seem to be acceptable changes, though occasionally the rationale for the change is poorly thought out or poorly documented--in at least one instance to the point that the information supplied can be considered inadequate. Some changes that are in conflict with the intent of the WIPP Hazardous Waste Facility Permit, and others, though often seemingly justified, appear to be Class 2 rather than Class 1 changes.

40 CFR 270.42 clearly states that Class 1 modifications may be put into effect on those modifications listed in Appendix I to 40 CFR 270.42, and many of the changes--particularly to waste sampling and analysis--do not fall under Appendix I Class 1 categorization. Many of the questionable items seem to be minor but potentially valuable changes. These likely should have been submitted under 40 CFR 270.42(d), which allows the regulatory authority to apply additional criteria (does not substantially alter the permit conditions or reduce protection of health and environment) to determine Class 1 status. However, the wording of the regulation is clear--the regulator is to make this determination, and the permittees are limited to Appendix I classifications.

Those with single asterisks preceding the alphanumeric designation are the items or sub-items with which disagreements of one sort or another are expressed. Those with double asterisks appear to be technically inappropriate changes to the HWFP.

1. Revision of Part A could not be assessed; the Part A submission was not attached to the on-line version of the change submission.
2. Clarification of the use of SW-846 methods for waste characterization seems allowable; the addition simply states that updates to SW-846 automatically become allowable methods under the HWFP. This was already implicit in the Permit, and the change will enhance the Permit by making it explicit.
- \*  
3. The revised text removes a requirement, and is therefore a questionable Class 1 submission. The listing of the change to Module VII.B.4.d, (p. VII-7), is not clearly listed in the on-line version<sup>1</sup>; in redline/strikeout format the change appears to be:

~~Except as exempted by Section 9(a)(1) in the WIPP LWA, the Permittees shall perform a waste analysis at least annually or when a process changes, to demonstrate that determine whether any hazardous waste generated at the facility meets applicable treatment standards: is restricted from land disposal and complete the notifications to the disposal facility where the waste will be shipped in accordance with 20 NMAC 4.1.800 (incorporating 40 CFR 268.7). Results shall be maintained in the operating record.~~

The changes to this section clearly change the intent of the WIPP HWFP. The DOE argument is that it is allowed as a 40 CFR 270.42 Appendix I B.1.a , "to conform with agency guidance or

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<sup>1</sup> The text was downloaded from a CAO internet site, and redline does not appear in the printing of the PDF files.

regulations" change, because the 40 CFR 268.7 regulations allow determination to be made by testing (waste analysis) or by acceptable knowledge. However, the argument can also be made that the HWFP clearly specified one method in this case, the change specifies the other. This could very easily be a Class II change. The change appears to be a valid one, and the NMED Secretary may be justified in declaring it a Class 1 change under §270.42.d(1), should the DOE resubmit it under that classification.

Note that the hazardous waste is "...that generated at the facility". This means waste generated at the WIPP site, most (if not all) of which will be either simply hazardous waste or low-level mixed waste, not the TRU and TRU mixed wastes the facility was constructed to dispose of.

4. This change consists of three minor editorial alterations that would seem to be allowed under §270.42 Appendix I.A.1 (informational changes) as specified in the Change submittal.
5. This change consists of 19 separate lettered items, each with their own Basis and Discussion sections. These are actually several different change requests, under several different portions of §270.42 Appendix I, and should have been submitted that way. Several are waste sampling and analysis method alterations that would seem to be Class 2 changes.
  - A: A very minor but necessary typographical change ("singing" to "signing").
  - \* B: The HWFP requires headspace gas samples to be collected in welded containers; the change is to drop the requirement that they be welded. This could be considered a Class 1 change under §270.42 Appendix I A.3 (equipment replacement with functionally equivalent components). The Change Submittal does not specify the Appendix I allowance (nor is there a requirement to do so, but it would seem to be a worthwhile practice). However, there may have been a reason for the addition of the term "welded" to the requirement; if so, this would be a Class II change.
  - \* C: Adds a necessary footnote to a table which limits analysis for PCBs to Waste Matrix Code S3220 (organic sludges) only. The DOE apparently considered this a §270.42 Appendix I A.1 "informational change"; however, as a change to a waste sampling and analysis method, it would seem to be a Appendix I B.1.d "other change" to sampling and analysis methods, which is Class 2. This is a substantive alteration to requirements in that it severely limits PCB sampling and analysis requirements that were universal in the original HWFP. This is a Class 2 change.
  - \*\* D: Changes the allow temperature range of a headspace gas manifold during sampling from "30° to 50° " (temperature scale type not specified) to "18° to 50° C". As with the previous item it fits best under §270.42 Appendix I B.1.d "other change" under waste sampling and analysis methods, which is a Class 2 change. The change is not a minor one, and may not be justified. The headspace gas manifold is under vacuum and the entry of gases from the headspace into the manifold will cool the gases as they expand. The cooling effect could allow gases sampled for to condense on the manifold interior, and hold up there until sampling is completed. This is a Class 2 change--simply adding the Celsius temperature scale would have been a Class 1 change (informational).
  - \*\* E: Removes from headspace gas sampling a requirement that drum punch sampling heads need not be of a type that is "...capable of punching through the metal lid of a drum

without causing sparks"; the "without causing sparks" is dropped. Flammable material in the drum is the obvious concern, and even an unnoticed low-intensity flash inside the drum could potentially change the concentration of flammable VOCs so that samples taken would not be representative of the contents. The submission does not address this obvious concern. Instead, a rationale that drum punches that can be passivated to minimize cross-contamination should be used, and "sparkless" metals do not meet that criterion.

As with 5C and 5D above, this item fits best as a §270.42 Appendix I B.1.d "other change" under waste sampling and analysis methods, which is a Class 2 change. Evidence should be submitted that (1) demonstrates that non-sparking metal cutters than can be adequately cleaned are not available; and (2) illuminates the trade-offs between sparking and cross-contamination concerns. This is a Class 2 change.

- F: The change is from "i.e." (id exempli) to "e.g.", which can only be classified as a justifiable Class 1 change as a §270.42 Appendix I A.1 informational change. It ain't worth worrying about.
- \*\* G. Holding times for samples were dropped from Table B1-1 before the HWFP was officially promulgated, and ostensibly this change seeks to drop the requirement from the text of Section B1-1b also. However, the strike-out also eliminates another item; the deleted text is "~~Holding times and container requirements for gas sample containers are provided in Table B1-1~~" (see p. A-10). Container requirements for gas sample containers (SUMMA canister) are still a part of Table B1-1. The change should be altered to reflect only what the DOE intended it to do--then it would seem to be a Class 1 change.
- \* H. A justified editorial change that changes "Equipment blanks" to "Field blanks". Unfortunately, §270.42 Appendix I B.2 only allows changes to analytical quality assurance/control plans to conform with agency guidelines, not to correct editorial mistakes. It appears that this item should be resubmitted as a request for classification as a Class 1 change, but it currently does not meet that classification.
- I. The word "and" was inadvertently left in a sentence; the change deletes it, and is proper under §270.42 Appendix I A.2, correction of typographical errors.
- \* J. This change justifiably deletes a requirement to perform visual examination only after completion of headspace gas sampling. The DOE correctly points out that this order for waste characterization activities is not necessary as long as drum holding times before headspace gas sampling are met. However, as with several other changes above, §270.42 Appendix I B.1 only allows waste sampling and analysis method changes to conform with agency guidance and regulations, and F039 (multi-leachate from landfill) associated changes to be treated as Class 1 changes. This is an apparent Class 2 change that should be resubmitted as a request for determination as a Class 1 change.
- K. The strikeout version of this change reads (in reference to homogenous solids and soil/gravel):

Samples of retrievably stored waste containers will be collected using appropriate coring equipment or other EPA approved methods to collect a

representative sample core.

The only way to obtain a “core” would be by use of “coring equipment”, and the inclusion of the phrase “or other EPA approved methods” implies samples other than cores. It’s not clearly a typographical error, but the change could be justified either as a valid Class 1 change under 40 CFR 170.42 Appendix I A.2.

L. The redline/strikeout version reads:

The sampling locations shall be randomly selected within three equal-length subsections of the ~~one~~core along the long axis of the liner...

This also is not clearly a “typographical” error--the typography was correct, the word used was wrong--but again could be justified as a valid Class 1 under 40 CFR 170.42 Appendix I A.1 as an informational change.

M. This change is that solids (homogenous solids and soil/gravel) sampling should collect co-located samples “...at a frequency of one per sampling batch, or one per week, whichever is more frequent”. The changed text is more restrictive--the original version merely required one co-located sample per sampling batch--and will align the requirement with other statements in the WAP. This change would seem to be a valid Class 1 as a 40 CFR 170.42 Appendix I A.1 informational change.

N. A sample custody requirement used the term “waste container” instead of “sample container”; the change is justified, and since similar “wrong word” issues have been considered as typographical errors this also would appear to be justified as of a 40 CFR 170.42 Appendix I A.1 informational change.

\* O. This change is actually two separate changes. The first is a reconsideration of a HWFP requirement that equipment blanks to be obtained from “fully assembled sampling and coring tools”, one from each cleaning batch. The DOE cites sampling tools which are not immediately reassembled, and the change is to allow an equipment blank to be obtained from tools in an unassembled state. This change would seem to be a 40 CFR 170.42 Appendix I B.2.b change; it involves a change to analytical quality assurance/control (B.2), but is not a change to conform with agency guidance or regulations (B.2.a), so it falls under B.2.b, other changes, which are designated Class 2. Since the change would seem to be readily allowable, the DOE should resubmit this change under 40 CFR 170.42.d as a request for a determination that it can be classified as a Class 1 modification.

The second alteration is a change to a different section, and is for a different reason. The change reads in strikeout form (Section B1-2b(3), p. B1-18):

All surfaces of coring tools and sampling equipment that will come into contact ~~with the waste and~~ the samples shall be clean prior to use.

The DOE submission states as the basis for the change (p. A-8):

The change to Section B1-2b(3) is required to make the sections consistent. That is, the requirement to clean waste surfaces is inconsistent with other requirements in the permit to avoid cross contamination.

The DOE seems to be misinterpreting the language; it is not the "waste surfaces" that must be clean, it is the sampling equipment that is to come in contact with it. The Permit wording is perhaps awkwardly phrased, but the requirement for cleaning of the tool surfaces that come into contact with the waste is more likely to prevent cross-contamination than the DOE's change. This is not a Class 1 change, but a Class 2, under the same argument as above, and should be rejected anyway.

- \* P. The HWFP requires pressure/vacuum gauges to be mounted on each SUMMA canister for the taking of headspace gas samples. SUMMA canisters are in vacuum, and samples are taken by opening the canister valve to allow the sample to fill the canister. One method of sampling (the only one considered in the change) is to attach these canisters to a manifold. A vacuum is drawn on the manifold before the canister valves are opened; the DOE change is to allow the vacuum/pressure gauge to be mounted only on the manifold, rather than individual SUMMA canisters. This would eliminate the cost and complications caused by gauges on each canister. Again, this is a sampling and analysis method change that is not for conforming with agency guidance or regulations, and is therefore a Class 2 change (§270.40 Appendix I.B.2(b)).

Valves on the SUMMA canisters would seem to ensure that the canisters have a vacuum before sampling begins. However, the HWFP does not require recording of pressures from these gauges prior to sampling, apparently relying on good sampling practices by the samplers to ensure that headspace gases actually do enter the canisters. The submitted change does not alter this practice; only if the technician identifies an increase of pressure on the manifold gauge when the SUMMA canister valve is opened would a lack of vacuum in the canister be identified. A part of the change should be a requirement for training of samplers to look for such changes, and/or a requirement to document the gauge readings before and after each valve is opened.

Headspace sampling also can be performed by direct connection of the SUMMA canister to the sampling head. In direct canister sampling (described in B1-1a(2)) the pressure/vacuum gauge should be on the SUMMA canister, as there is no manifold. This change would eliminate the only requirement for this in the HWFP. As a part of this change, a requirement that the pressure/vacuum gauge be on the SUMMA canister for direct canister sampling should be made.

- Q. Another "singing" to "signing" typographical change.

- R. In strikeout mode, the change is:

Sampling through the drum lid ~~shall~~ may be performed as an alternative to sampling through the drum's carbon-composite filter if an air-tight seal can be maintained.

The "may" was in the original text, and obviously one of the two words should be deleted

as a typographical error. Which word is deleted does not appear to make a difference to the substance of the sentence.

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S. This change deletes a requirement that should remain within the permit. The HWFP requires both manifold and canister pressure/vacuum gauges used in gas sampling to be certified prior to initial use, and annually. The DOE change would eliminate the requirement for canister pressure/vacuum gauges, according to the DOE to align with sub-item P (above). However, the DOE failed to consider that direct canister method (discussed in the review of sub-item P above) would need pressure/vacuum gauges on the SUMMA canisters. As with other changes listed above, this change should be a Class 2, as it is an "other change" under §270.42 Appendix I.B.1.

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6. This change deletes a reference to an example in the canceled (not "retired") QAPP. The document still exists--it was the cornerstone of waste characterization for WIPP for 5 years--and the example in the document is still valid for the HWFP. The DOE states that the change is necessary to keep the HWFP current with facility operations; however, the example is not replaced by another, and is still valid. There appears to be no reason for the change.

7. As with Change Submission 5 above, this change consists of multiple separate lettered items, each with their own Basis and Discussion sections. These are actually several different change requests, under several different portions of §270.42 Appendix I, and should have been submitted that way.

A. An administrative or informational change, from "CAO Office of Regulatory Compliance Manager" to "Permittee", a valid Class 1 change under §270.42 Appendix I.A.1.

\* B. Change to remove a reference to granting of a variance as a method for correcting nonconformances to waste sampling and analysis requirements. The DOE rationale is that the DOE no longer allows variances. This is a change to a waste sampling and analysis requirement, and the change is not to meet regulatory guidance or regulations, is not associated with F039 sampling and analysis, and is not associated with underlying hazardous constituents in ignitable or corrosive wastes. therefore it falls under §270.42 Appendix I.B.2(b), and should be a Class 2 change. The DOE should resubmit this as a §270.42(d) request for determination as a Class 1 change.

C. This change is considered by the DOE to be a "typographical error" under Description (p. A-16), and also states it "...provides for the correct reference to DQOs in the text of Section B3-11" under Basis (also p. A-16). The original HWFP references the DQO section of the QAPP instead of the DQO section of the WAP, and the improper reference is properly replaced. This is a conceptual, rather than a typographical, error, but is nevertheless a minor §270.42 Appendix I.A.1 informational change.

\* D. This change eliminates a waste characterization project level reporting requirement. The change is as follows:

For each waste container being reported in the waste stream characterization summary packages, the following information shall be included: ...~~A summary of all process knowledge documentation~~

supporting the waste stream characterization (e.g. the acceptable knowledge summary report).

The rationale for the change provided by the DOE is that (p. A-16):

This requirement is not necessary under this heading. This summary should be included in the up-front narrative section of the waste stream characterization package and is already required under section B3-10. This level of information is more appropriate on a waste stream level than on a [sic; an] individual drum basis.

The change is a major alteration to a permit requirement, and should be considered a Class 2 change.

- E. This change simply adds an "e.g." to a parenthetical example, which can easily be considered a §270.42 Appendix I.A1 informational change.
- F. A typographical error in a Table footnote is corrected, justified under §270.42 Appendix I.A.2.
- G. The wrong section of the HWFP was referenced; this change corrects the informational error (§270.42 Appendix IA.1 change).
- \* H. The precision QAO for total metals analysis is amended as follows (in redline/strikeout version; the comma is struck out):

Precision shall be assessed by analyzing laboratory sample duplicates; ~~or~~ laboratory matrix spike duplicates, replicate analyses of laboratory-control samples, and PDP blind-audit samples.

The DOE explanation for the change is that it is inconsistent with similar sections of the WAP that address VOC (B3-6) and SVOC (B3-7) precision; both these sections contain the amended wording. The DOE also notes that Table B3-9, Laboratory Control Samples and Frequencies for Metals Analysis, does not address acceptance criteria for laboratory sample duplicates.

This change alters a requirement of the permit. Metals analysis is a separate category from VOC or SVOC analysis, and Table B3-8, Metals Target Analyte List and Quality Assurance Objectives, does contain a precision criteria. The problem could as easily be that Table B3-9 should add laboratory sample duplicate requirements as it is that . The clear intent was that all the various replicates were to be used to assess precision; the change separates lab sample duplicates out and makes it an either-or logical construction. This is not one of the Class 1 changes allowed to analytical quality assurance/control plans (§270.42 Appendix I.B.2), and should be considered a Class 2 change.

- \*\* I. The total metals analysis is to calculate the program required quantitation limit (PRQL) based on dry weight. The DOE wishes to change this to wet weights, citing "SW-846" as requiring sample results to be based on a wet weights. SW-846 consists of hundreds of

methods and thousands of pages--a more specific reference should be supplied in the justification. The submitted change alters a requirement of the permit in a significant way, and should be considered a Class 2 change until a better rationale for the change is provided.

- \* J. The permit requires that waste characterization data package review signature releases are to be performed before "...any waste associated with data reviewed is characterized...". This is a logical impossibility that should be removed from the permit. However, it does not fall under any of the §270.42 Appendix I.B.1 Class 1 changes allowed, and must therefore be considered a Class 2 change under B.1.d. "other changes". The DOE should resubmit the change under §270.42(d), requesting the regulator to allow it to be considered a Class 1 change.

8. A change to another reference error; Section B3-b was referenced instead of B4-3b. The correction is a proper Class 1 change, under §270.42 Appendix I.A.1, informational change.

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9. This is another change to align one part of the permit with another, in this case a temperature value in an auditing checklist (B6) with the actual requirement in the text of Section B1-1a. The DOE properly classifies this change as falling under §270.42 Appendix I.A.1 as an informational, Class 1 change. However, the Basis, and the temperature value selected to change to, are questionable. The Basis states that:

Section B1-1a of the permit allows HSG sampling at ambient equilibrium temperatures of 19°C or higher.

The temperature "19°C" is not in Section B1-1a, nor is there any statement of the temperatures at which headspace gas sampling can take place. The section does state that all headspace gas sampling is to be performed only on drums that are in compliance with the container equilibrium requirement of 72 hours at 18°C or higher. The change to the B6 checklist should be amended to read 18°C.

10. This change consists of two independent sub-items concerning waste-handling equipment inspection logbooks at the WIPP. The change removes requirements to enter (A) inspection results into "appropriate logbooks", and (B) inspection observation notations, and "the date and nature of any repairs or other remedial actions" into inspection logs. These changes would seem to be valid Class 1 changes under §270.42 Appendix I.B.3, changes in procedures for maintaining the operating record, but are tied to Change Item 12A. If Item 12A is not accepted then these changes probably should not be allowed either.

It's worth noting the the language deleted from sub-item B is part of an almost direct quotation from 40 CFR 264.15(d). The CFR allows a "log book or summary"; the HWFP language only allows logbooks. The Attachment D1 checklists in Change Item 12A could be classified as summary documents.

11. A change to eliminate the manufacturer's name that has become attached to equipment that may be purchased from other manufacturers. The DOE properly identifies the change as an Appendix I.A.1 administrative and informational change.

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12. What should have been three separate changes are listed as sub-items in this change. The actual changed HWFP were not included in the CAO on-line version of the changes--the Discussion portion of the submitted change references an Attachment 1-B for which only the title page was included in the on-line version. The NMED's on-line HWFP also did not include the references, so that neither verification of the changes nor a full understanding of the HWFP text could be performed.

The change Discussion identifies all three sub-items as Class 1 changes under §270.42 Appendix I.A.1, administrative or informational changes.

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November 10, Item 12 comments that may be applicable once the applicable portions of the permit are reviewed:

- A. This sub-item adds signature blocks to a number of checklist forms to bring them in conformance with 40 CFR 264.15(d) (see Change Item 10 above), and could be justified as a Class 1 change under §270.42 Appendix I.2.a, to conform with agency guidance or regulations. As noted above, however, the implementation of these changes could not be checked in the on-line version of this change. The NMED should verify that the changes are as stated before accepting them.
- \* B. This sub-item changes the requirement for minimum water level in the "north DW STG tank" to 60%, in order to meet other HWFP requirements that such tanks are to contain at least 100,000 gallons. This is a 180,000-gallon tank, and the 60% fill level would be 108,000 gallons, so the change seems conservative.
- There are, however, two considerations that should be evaluated before accepting the change. The first is that the change to the reference ("Facility Operations Round Sheet for location 456, Pumphouse Building") needs to be verified as accurate. The second is that the tank might become damaged, or changed to a smaller tank for another reason at some time in the future. There should be provision to ensure that the minimum 100,000 gallon limit would still be met should the tank be changed.
- C. Various vehicle wheel pressures are changed to a range of apparently appropriate values from what was a single value. Again, the changes in the reference needs to be verified.

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13. Four sub-item changes are listed, and appear to meet Class 1 criteria under §270.42 Appendix I.A.1, administrative and information changes. No further checking was made on these items.
14. This change contains two sub-items, both of which seem to represent substantive changes to permit:
- \*\* A. Deletes a requirement that forklifts used at WIPP be designed and constructed so as to retain their loads in the event of a power loss. The DOE argument is that forklifts have self-contained power supplies, so that loss of site electrical power has no impact on their operation. The HWFP language, however, does not refer merely to site electric power loss; its words are "...so that they will retain their loads in the event of a loss of power". A

battery-operated forklift should still be required to retain its load when the batteries become depleted, or a short in the wiring occurs. The change is not a §270.42 Appendix I.A.1 administrative and informational change as the DOE submission cites. It deletes a requirement and should be a Class 2 change.

- \* B. Deletes a potential method of fire suppression (firefighting foam) that is a part of the HWFP. The DOE supplies no justification for the change; the Basis merely states "This change properly identifies those methods that may be used to fight fires involving TRU mixed waste". Again, this appears to change the intent of the HWFP, and is not a §270.42 Appendix I.A.1 administrative and informational change. This should likely be submitted as a request for designation as a Class 1 change under §270.42(d).
- 15. Four sub-items are included in this change, all related to training, and all seem justified under §270.42 Appendix I.B.5.b, other changes to training plans, as none seem to affect the type or lessen the requirements of the training.
- 16. Nine sub-items are included in this change, all related to training, and all seem justified under §270.42 Appendix I.B.5.b, other changes to training plans, as none seem to affect the type or lessen the requirements of the training.
- 17. The change is to add a position to the training list (environmental Sampling Team Assistant). This change, and the assigning it as a Class 1 change under §270.42 Appendix I.B.5.b, other changes to training plans, seems valid.
- \* 18. Change to a requirement specifying a nylon sampling pump line (hose?) is to be used; the change eliminates the requirement that the line be nylon, in several places. The change does not specify a §270.42 Appendix I.A.3, equipment replacement or upgrading, as the DOE submission states--it eliminates a specification, without replacing it. The change should likely simply change the wording to specify that a non-reactive line be used. As it stands it should be classified as a Class 2 change.
- \*\* 19. This changes the requirement that space be maintained over the stacks of containers in the repository to assure adequate ventilation during waste handling operations. The DOE identifies the requirement as conflicting with a statement in the permit that "No roof maintenance behind stacks of waste is planned", and identifies it as a Class I change under §270.42 Appendix I.A.1, administrative or informational change. There doesn't appear to be any conflict--the room or panel could simply be closed off when the ventilation requirement can no longer be met. This is an alteration of an important requirement, not a mere informational change, and should be a Class II change.
- 20. This change was not evaluated--it consists of changes to the WID QAPD and another WID document entitled Calibration and Control of Monitoring and Data Collection Equipment. These documents were not attached to the on-line change submission, and have yet been received from other sources.