

Chronolog WIPP Waste Analysis Plan (WAP) Requirements

May 26, 1995 - DOE submits initial WIPP Permit Application

Contained first proposal for requiring waste characterization at generator sites.

July 21, 1997 - DOE submits final revision relating to WAP

May 15, 1998 - NMED issues initial WIPP Draft Permit

Contains NMED's initial proposal for implementation of WAP requirements

November 14, 1998 - NMED issues WIPP Revised Draft Permit

Contains NMED's response to comments by public, including RFETS, INEEL, and LANL.

June 25, 1999 - NMED issues WIPP Proposed Final Permit

NMED identifies all elements recommended for incorporation into final permit. Includes responses to comments at public hearing and written comments from same three generator sites.

From this date forward, there were no changes in WAP requirements!!!!

October 27, 1999 - NMED issues final WIPP Hazardous Waste Facility Permit

No changes to WAP requirements from June 25, 1999 version

November 12, 1999 - WIPP Notification that all remaining shipments from RFETS to WIPP are suspended, apparently due to readiness problems at RFETS.

November 26, 1999 - WIPP Permit becomes effective

No further shipments allowed until WIPP complies with permit requirements regarding audit activities at generator sites and NMED approval of audit reports.

December 13-17, 1999 - Initial WIPP audit at RFETS

Results were indeterminate, because site had only been implementing actual procedures required by WIPP permit for less than one week (only three containers available for review during audit).

December 28, 1999 - DOE puts \$20 million in trust as their selected mechanism to comply with financial assurance requirements of the permit.

January 18-20, 2000 - Second WIPP audit at RFETS

WIPP determines RFETS fulfills requirements of WAP.

January 24-28, 2000 - Hanford audit.

January 27, 2000 - WIPP submits final audit report for RFETS to NMED

Report consists of 21-page report, 134-page detailed checklist required by permit, and approximately 8,000 pages of ancillary documentation (example of implementation, actions taken to correct deficiencies, and final approved SOPs).

February 17, 2000 - TechLaw submits initial draft review of RFETS audit report.

Identifies no major issues, but includes suggestions for improvement to process.

February 22, 2000 - TechLaw submits additional comments on RFETS audit report

February 25, 2000 - DOE's proposed initial shipment under permit (60 after meeting FA requirements)

March 15, 2000 - Expected date of NMED final determination on RFETS audit report

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