



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
September 21, 2001

 ENTERED



Mr. Steve Zappe, Project Leader  
New Mexico Environment Department  
2905 E. Rodeo Park Drive, Bldg. 1  
Santa Fe, NM 87505

RE: Response to Inquiry of September 18, 2001, Container IDRF074112468

Dear Mr. Zappe:

The purpose of this letter is to respond to your inquiry of September 18, 2001 to Ken Mikus, Westinghouse TRU Solutions about the WWIS Repository Report (Enclosure 1) regarding the emplacement of an 85-gallon drum overpack container in the WIPP. You requested that the response be submitted to you no later than September 21, 2001. It is my belief that the following summary of events and actions respond to your inquiry.

It was determined that Container IDRF074112468, received August 25, 2001 did not meet the acceptance criteria for containers expressed in the WIPP Hazardous Waste Facility Permit (HWFP). This determination led to the separation of this container from the seven pack assembly in which it was shipped. Container IDRF074112468 was then placed in an 85-gallon overpack container and disposed as a separate container on September 6, 2001, as allowed by the WIPP HWFP. A dunnage drum was placed in the void in the seven pack after removal of Container IDRF074112468 and normal disposal continued for the remainder of the containers.

Container IDRF074112468 has been in the WWIS since its emplacement and available in the container data report query. A report regarding the drum information may be printed by performing the following:

- Start the WWIS application on your PC
- Select Inventory >Inventory Reports > Waste Container Data Reports
- Enter 'IDRF074112468' for the Container ID

The WWIS should generate a report as found in enclosure 2, IDRF074112468.pdf, RP0360 Waste Container Data Report.

The container in question, IDRF074112468 from INEEL, was submitted, reviewed and approved in the WWIS as is every other container, which is sent to WIPP for disposal. The information you requested regarding the container (i.e., container number, where it came from, the associated waste stream profile, disposal location, etc.) is in enclosure 2 and will also print when you query the container data report from your PC.



A flaw in the WWIS logic was noticed when WWIS personnel were in the act of emplacing the overpacked container on September 6, 2001. As you will recall, the emplacement report generated by WWIS is based upon waste container assemblies (seven packs of waste, four packs of overpacks, SWBs, or TDOPs). Because the overpacked container was removed from its shipping assembly, the WWIS would not include it in the emplacement report.

Corrective action to resolve this issue has been underway since discovery and was completed at approximately 1600 on 9/18/01. The change to WWIS was performed using the required software configuration management protocols and by use of the WWIS Software Modification Request. The modification was subjected to developer peer review and testing by a qualified WWIS software tester prior to implementation.

As a result of the software modification, the emplacement report, as demonstrated in enclosure 3, RP0440.pdf, RP0440 Waste Emplacement Report, now shows the emplaced overpacked drum. The overpack container is shown at COLUMN position "1i" as the container was actually emplaced in the interstitial space closest to COLUMN 1.

Because the drum was removed from its original assembly, the WWIS group has entered a comment which appears in the container data report identifying the shipment and manifest numbers. The original assembly now shows a dunnage in place of the overpacked container. In addition, the WIPP has entered the manifest number associated with this drum on the U/G waste emplacement map. Enclosure 4, WWIS Data Change Request Sheet and enclosure 5, Waste Emplacement Diagram provide the WWIS data change request to include the aforementioned comment on the container data report and the emplacement map with the overpacked drum, container IDRF074112468.

In summary, the container is, and has been, in the WWIS and accessible by performing a waste container data report. The WWIS personnel have subsequently executed a modification to allow WWIS to recognize the emplaced overpack container when printing the waste container emplacement report. The container is compliant with all tenets of the WIPP HWFP as demonstrated by the waste container data report included as an attachment and accessible from your PC.

If you have any further questions, please contact me at (505) 234-7300 or Mr. Jody Plum at (505) 234-7462 or on his pager at (505) 481-9034.

Sincerely,



Dr. Inés R. Triay  
Manager

Mr. Steve Zappe

-3-

September 21, 2001

cc:

C. Zvonar, CBFO

K. Watson, CBFO

J. Plum, CBFO

J. VandeKraats, CBFO

R. Kehrman, WTS

G. Barnes, WTS

J. Cotton, WTS

# Enclosure

1

## Waldram, Veronica - DOE

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**From:** Plum, Jody - DOE  
**Sent:** Friday, September 21, 2001 9:05 AM  
**To:** Waldram, Veronica - DOE  
**Subject:** FW: 85-gallon overpack in WWIS



Card for Steve  
Zappe

This is Attachment 1.

-----Original Message-----

**From:** Steve Zappe [mailto:Steve\_Zappe@nmenv.state.nm.us]  
**Sent:** Tuesday, September 18, 2001 9:05 AM  
**To:** Ken Mikus  
**Cc:** Dave Speed; Jody Plum; Bob Kehrman  
**Subject:** 85-gallon overpack in WWIS

Ken -

I noticed last week in the WWIS Repository Report that an 85-gallon drum overpack appeared on the Container page, and it states that it was emplaced. However, I can find no further information on an overpacked container in the WWIS.

Please provide information - either within the WWIS (preferred) or otherwise - to demonstrate that this container met the storage and disposal requirements of the permit. Things I would like to know include container number, where it came from, the associated waste stream profile, disposal location, etc. Also, please explain why I can't find it as a container in the WWIS (without insulting me, please!).

As this appears to be a matter of permit compliance, I will follow up with an official letter if I haven't received a satisfactory reply by Friday. Thanks!

Steve  
(505) 428-2517

# Enclosure 2

# Waste Isolation Pilot Plant

## WWIS

**Report**      *RP0360*    *Waste Container Data Report*  
**Filename**  
**Run by**      *OFFNERS*  
**Report Date**    *09/20/2001 11:43*  
**Total Pages**    *5*

### Selection Criteria

**Module**    *RP0360*  
**Version**    *1.5*  
**Container Number**    *IDRF074112468*  
**Site Id**    %  
**Waste Stream**    %  
**Data Status Code**    %

# Waste Container Data Report

WIPP Waste  
Information System

Waste Isolation Pilot Plant

Page 2 of 5

Container Number : **IDRF074112468**  
 Site ID : **IN - IDAHO NATIONAL ENGINEERING LAB**  
 Data Status Code : **Container Emplaced at WIPP**  
 Waste Stream Profile : **INW216.001**  
 Container Type : **001 - 55 GAL DRUM**

## Waste Container Information

WAC Ex. # :	Handling Code :	CH
WAC Rev # : 7	Waste Type:	MTRU
Cert Date : 06/15/2001	Waste Stream BIR ID :	IN-W216
Cert Site : IN - IDAHO NATIONAL ENGINEERI	Waste Stream MWIR ID :	IN-W216
Generator Site : RF - ROCKY FLATS	TRU Alpha Act (Ci) :	2.010E+00
IDC Code : 001	TRU Alpha Act Uncert (Ci) :	1.762E+00
Matrix Code : S3121	TRU Alpha Act Conc (Ci/g) :	1.099E-05
TRUCON Code : ID211A	TRU Alpha Act Conc Uncert (Ci/g) :	9.639E-06
Shipping Category : 1001300190	Pu239 Eq Act (PE Ci) :	2.010E+00
PCB Conc (ppm) : 0	Pu239 Fiss Gm Eq (FGE) :	8.800E-01
Decay Heat (watts) : 6.706E-02	Pu239 Fiss Gm Eq Uncert (FGE) :	7.700E-01
Decay Heat Uncert (watts) : 5.879E-02	Layers of Packaging :	2
Closure Date : 01/16/1973	Fill Factor (%) :	75
Vent Date : 12/07/1987	Liner Exists :	Y
Aspiration Method ID : 3	Liner Hole Size (mm) :	7.62
Gas Gen Rate :	Gross Weight (kg) :	217.27
Gas Hyd Meth Gen Rate :	Gross Weight Uncert (kg) :	.91
Gas Gen Comp Date :	Alpha Surf Cont (dpm/100cm2) :	0
Shipment Num :	BG Surf Cont (dpm/100cm2) :	0
Packaging Num :	BG Dose Rate (mrem/hr) :	3
Assembly ID :	Neut Dose Rate (mrem/hr) :	0
Container Disposal Date : 09/06/2001	Total Dose Rate (mrem/hr) :	3
Container Status Code : XO4	Overpack Cntr Num : IDRF074112468	
	Overpack Cntr Type : 9 - 85 GALLON DRUM - OVERPACK	

## Nuclide Information

Radionuclide	Description	Activity (Ci)	Activity Uncert (Ci)	Mass (g)	Mass Uncert (g)	List
AM-241	AMERICIUM 241	1.951E+00	1.711E+00	5.624E-01	4.930E-01	Y
PU-238	PLUTONIUM 238	1.434E-03	1.667E-03	8.287E-05	9.636E-05	Y
PU-239	PLUTONIUM 239	4.669E-02	4.088E-02	7.424E-01	6.498E-01	Y
PU-240	PLUTONIUM 240	1.038E-02	9.249E-03	4.514E-02	4.021E-02	Y
PU-241	PLUTONIUM 241	1.420E-01	1.346E-01	1.365E-03	1.294E-03	Y
PU-242	PLUTONIUM 242	1.347E-06	1.793E-06	3.394E-04	4.518E-04	Y



# Waste Container Data Report

WIPP Waste  
Information System

Waste Isolation Pilot Plant

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Container Number : **IDRF074112468**  
Site ID : **IN - IDAHO NATIONAL ENGINEERING LAB**  
Data Status Code : **Container Emplaced at WIPP**  
Waste Stream Profile : **INW216.001**  
Container Type : **001 - 55 GAL DRUM**

## Nuclide Information (continued)

Radionuclide	Description	Activity (Ci)	Activity Uncert (Ci)	Mass (g)	Mass Uncert (g)	List
U-234	URANIUM 234	8.264E-07	1.103E-06	1.308E-04	1.745E-04	Y
U-235	URANIUM 235	2.664E-07	2.413E-07	1.216E-01	1.102E-01	Y

## Material Parameters Information

Waste Matl Parm	Description	Weight (kg)
4	OTHER INORGANIC MATERIALS	10.89
9	SOLIDIFIED INORGANIC MATERIAL	170.10
13	STEEL CONTAINER MATERIALS - KG	26.76
14	PLASTIC/LINERS CONTAINER MATERIALS- KG	9.53

## Filter Model Information

Filter Model	Description	Quantity	Install Date
NF020	NUCFILL CARBON COMPOSITE	1	05/11/2001

## Assay Methods Information

Radio Assay Method	Description	Assay Date
P/GS	PAN/GAMMA SYSTEM	04/03/2001

## Characterization Methods Information

Method ID	Description	Charz Method Date
RTR	REAL-TIME RADIOGRAPHY	04/03/2001

## Hazardous Code Information

Haz Code	Description
D004	ARSENIC
D005	BARIUM
D006	CADMIUM
D007	CHROMIUM
D008	LEAD
D009	MERCURY
D010	SELENIUM
D011	SILVER

# Waste Container Data Report

WIPP Waste  
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Container Number : **IDRF074112468**  
Site ID : **IN - IDAHO NATIONAL ENGINEERING LAB**  
Data Status Code : **Container Emplaced at WIPP**  
Waste Stream Profile : **INW216.001**  
Container Type : **001 - 55 GAL DRUM**

## Hazardous Code Information (continued)

Haz Code	Description
D022	CHLOROFORM
F001	SPENT HALOGENATED SOLVENTS
F002	SPENT HALOGENATED SOLVENTS
F005	SPENT NON-HALOGENATED SOLVENTS
F006	WASTEWATER TREATMENT SLUDGE
F007	SPENT CYANIDE PLATING BATH
F009	SPENT STRIPPING SOLUTION

## Sample Information

Sample ID: **ID051101EI636** Sample Type: **HS**  
Layer No Sampled : **0** Date Sampled : **05/11/2001**

CAS Number - Analyte Name	Method ID	Concentration	Date Analyzed	Detection Flags
100-41-4 - ETHYL BENZENE	9930.4	.670 Ppm	05/22/2001	J
107-06-2 - 1,2-DICHLOROETHANE	9930.4	.091 Ppm	05/22/2001	U
108-10-1 - METHYL ISOBUTYL KETONE	9930.4	.150 Ppm	05/22/2001	U
108-67-8 - 1,3,5-TRIMETHYLBENZENE	9930.4	.120 Ppm	05/22/2001	U
108-88-3 - TOLUENE	9930.4	2.700 Ppm	05/22/2001	J
108-90-7 - CHLOROBENZENE	9930.4	.240 Ppm	05/22/2001	U
108383/106423 - M,P-XYLENE	9930.4	1.500 Ppm	05/22/2001	J
110-82-7 - CYCLOHEXANE	9930.4	.210 Ppm	05/22/2001	U
127-18-4 - TETRACHLOROETHYLENE	9930.4	.370 Ppm	05/22/2001	J
1333-74-0 - HYDROGEN	9925.0	.0054 Volume %	05/17/2001	U
156-59-2 - CIS-1,2-DICHLOROETHYLENE	9930.4	.150 Ppm	05/22/2001	U
56-23-5 - CARBON TETRACHLORIDE	9930.4	.150 Ppm	05/22/2001	J
60-29-7 - ETHYL ETHER	9930.4	.270 Ppm	05/22/2001	U
67-56-1 - METHANOL	9910.4	18.000 Ppm	05/21/2001	U
67-64-1 - ACETONE	9930.4	2.000 Ppm	05/22/2001	J
67-66-3 - CHLOROFORM	9930.4	.077 Ppm	05/22/2001	U
71-36-3 - BUTANOL	9930.4	1.800 Ppm	05/22/2001	J
71-43-2 - BENZENE	9930.4	.890 Ppm	05/22/2001	J
71-55-6 - 1,1,1-TRICHLOROETHANE	9930.4	72.000 Ppm	05/22/2001	NA

# Waste Container Data Report

WIPP Waste  
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Container Number : IDRF074112468  
Site ID : IN - IDAHO NATIONAL ENGINEERING LAB  
Data Status Code : Container Emplaced at WIPP  
Waste Stream Profile : INW216.001  
Container Type : 001 - 55 GAL DRUM

## Sample Information (continued)

Sample ID: ID051101EI636 (continued)      Sample Type : HS  
Layer No Sampled : 0      Date Sampled : 05/11/2001

CAS Number - Analyte Name	Method ID	Concentration	Date Analyzed	Detection Flags
75-09-2 - METHYLENE CHLORIDE	9930.4	.170 Ppm	05/22/2001	U
75-25-2 - BROMOFORM	9930.4	.200 Ppm	05/22/2001	U
75-34-3 - 1,1-DICHLOROETHANE	9930.4	.200 Ppm	05/22/2001	U
75-35-4 - 1,1-DICHLOROETHYLENE	9930.4	1.400 Ppm	05/22/2001	J
76-13-1 - 1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	9930.4	.140 Ppm	05/22/2001	U
78-93-3 - METHYL ETHYL KETONE	9930.4	.250 Ppm	05/22/2001	U
79-01-6 - TRICHLOROETHYLENE	9930.4	21.000 Ppm	05/22/2001	J
79-34-5 - 1,1,2,2-TETRACHLOROETHANE	9930.4	.160 Ppm	05/22/2001	U
95-47-6 - O-XYLENE	9930.4	.250 Ppm	05/22/2001	J
95-63-6 - 1,2,4-TRIMETHYLBENZENE	9930.4	.180 Ppm	05/22/2001	U

## Comment Information

Comment Type	Comments
GENERAL COMMENTS	This container came to WIPP in shipment #IN010123, manifest #50102 and was overpacked in an 85 gal drum and its original assembly position was replaced by a dunnage container.

## Location Information

Panel Number	Room Number	Row	Col	Ht
1	6	10	1i	B

# Enclosure

# 3

## Waste Isolation Pilot Plant

### WWIS

Report **RP0440** *Waste Emplacement Report*

Filename

Run by **OFFNERS**

Report Date **09/19/2001 15:55**

Total Pages **2**

#### Selection Criteria

Module	<b>RP0440</b>
Version	<b>1.2</b>
Start Date	<b>01/01/1999</b>
End Date	<b>09/19/2001</b>
Container Number	<b>IDRF074112488</b>
Site Id	<b>%</b>
Panel	<b>%</b>
Room	<b>%</b>
Bore Hole	<b>%</b>
Building	<b>%</b>
Pad	<b>%</b>

\* Indicates Dunnage

# Waste Emplacement Report

WIPP Waste  
Information System

Waste Isolation Pilot Plant

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Panel: 1

Room: 6

(Process Code: X04)

Report Row #	Container Number	Site ID	Shipment Number	Assembly ID	Emplacement Date	Hazardous Codes	Matrix Code	Container Weight (kg)	Emplacement		
									Row	Col	Ht
1	IDRF074112468	IN			09/06/2001	D004,D005,D006,D007,D008, D009,D010,D011,D022,F001, F002,F005,F006,F007,F009	3000	217.27	10	1i	B

**Enclosure**

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### ATTACHMENT 4 - WWIS DATA CHANGE REQUEST SHEET

Data Change Number: \_\_\_\_\_

Brief Description of Data Change: Add a statement to the Comments Field for IDR074112468

Detailed Description of Data Change (use additional sheets as necessary):

Add the following to the comment field: This container came to WIPP in Shipment #IN010123, Manifest #50102 and was overpacked in an 85-gal drum and its original assembly position replaced by a dunnage container.

(Fill in the Blanks)

Container #: IDRF074112468 Date of Receipt: 8/25/01 Shipment #: IN010123

Date Emplaced: 9/6/01 Emplacement Location: Panel 1, Room 6, Row 10, Col 1i, Bottom

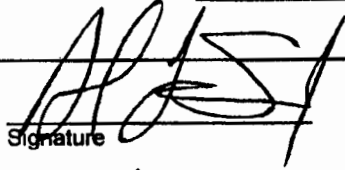
Container #: INDUNN074112468 Date of Receipt: 8/25/01 Shipment #: IN010123

Date Emplaced: 9/6/01 Emplacement Location: Panel 1, Room 6, Row 10, Col 1, Top

Shipper Site: IN

Technical Contact: Dave Speed

D. Speed  
Requester Name

  
Signature

9/26/01  
Date

Approvals:  
M. Strum  
WWIS Data Administrator Name

  
Signature

9/20/01  
Date

S. Offner  
WWIS Cognizant Engineer Name

  
Signature

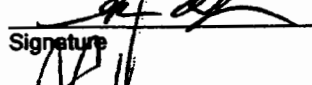
9/20/01  
Date

P. Damm  
WWIS Software QA Specialist Name

  
Signature

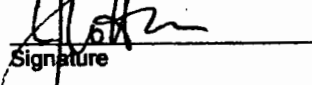
9/20/01  
Date

S. Offner  
WWIS Database Administrator  
Concurrence:

  
Signature

9/20/01  
Date

J. J. Cotton  
Cognizant Manager

  
Signature

9/20/01  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



# Enclosure

# 5

MANIFEST NUMBER  
50102

SHIPMENT IND10123

85 Actual  
Order  
10RF07412448

T R FDA 7409 M R FDA 1559 B R FDA 2957	B SR 611004	T R FDA 8033 M SR 074700304 B SR 074700185	B SR 741206574	T R FDA 7436 M SR 074700305 B SR 074700448 7.9.19.07	B SR 741201880
T SR 741202609 M R FDA 1935 B R FDA 2593	T SR 741201184 M SR 741200725 B R FDA 7167	T R FDA 5480 M SR 741201916 B SR 741200910	T R FDA 741201870 M R FDA 8585 B R FDA 8520	T SR 741202192 M SR 741202192 B SR 074700262	T R FDA 6680 M R FDA 3878 B R FDA 7050
T SR 741200550 M R FDA 7422 B R FDA 7416	T SR 674701030 M SR 741200707 B SR 074700863	T SR 741200964 M R FDA 8549 B R FDA 8045	T SR 074700705 M SR 074701063 B SR 074700449	T SR 074700850 M R FDA 7132 B R FDA 6682	T SR 074700650 M R FDA 6454 B R FDA 5679
T R FDA 2488 M R FDA 5530 B R FDA 3035	T SR 074700746 M SR 004002597 B SR 004101590	T R FDA 6477 M R FDA 8744 B R FDA 8522	T SR 741200440 M SR 004002049 B SR 074700910	T SR 741200506 M SR 004002316 B SR 004002050	T SR 741202457 M SR 074700225 B SR 074700138
T SR 00005782 T SR 741201184	T SR 741205807 M SR 98556 B R FDA 5545	T SR 00005783 M SR 741201163	T R FDA 3061 M SR 741200831 B SR 741200844	T R FDA 8061 M SR 741201600	T R FDA 3668 M R FDA 8778 B R FDA 8770

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