



TRU SOLUTIONS
Westinghouse TRU Solutions LLC

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To: Steve Zappe

From: Bob Hehrman

Fax:

Fax:

Phone:

Phone:

Pages (including cover sheet): 3

Date:

Re:

Comments:

Steve, after our discussions with you, we've decided to rescind two of the Class 1 - Hazard Ops & Incident Levels, and clarifying Job Descriptions. I'm in tomorrow 505 234 7462 (o) or 505.481.9034 (p). THANKS.

Jody

010966





Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

26 SEP 2001

Mr. Steve Zappe, WIPP Project Leader
Hazardous Waste Permits Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 E. Rodeo Park Dr. Bldg. 1
Santa Fe, New Mexico 87505-6303

RE: Class 1 Permit Modifications Dated June 28, 2001

Dear Mr. Zappe:

The Department of Energy (DOE) requests that two of the Class 1 modifications from our June 28, 2001 submittal, which were in question, be rescinded. These are:

- Item 1.a.2 Updated Incident Level Descriptions
- Item 1.a.3 Updated Hazard Assessment

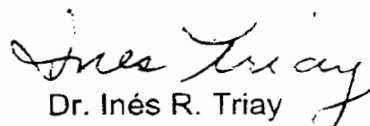
We have enclosed the updated Hazard Analysis as per your request.

Additionally, we have enclosed our response to your questions regarding the following item from the June 28, 2001 submittal:

- Item 4.a.5 and 4.a.6 Updated Job Descriptions

If further questions arise please feel free to contact Mr. Jody Plum at (505) 234-7462.

Sincerely,


Dr. Inés R. Triay
Manager

Enclosure

cc: w/o enclosure
C. Zvonar, CBFO
J. Plum, CBFO
R. Kehrman, WTS

Class 1 Modifications Dated June 28, 2001

Item 1.a.2

This modification has been withdrawn and will be re-submitted at a later date with additional details.

Item 1.a.3

This modification has been withdrawn and will be re-submitted at a later date with additional details.

A copy of the document entitled "Report of Emergency Planning Hazard Assessment for the Department of Energy Waste Isolation Pilot Plant (WEPHA-2000) Revision 1" has been attached.

Item 4.a.5

This modification was necessary to keep the permit current with staffing requirements at the WIPP facility.

This modification changed the title of Non-TRU Waste Handlers to Site Generated Waste Handlers. All non-TRU waste is site generated waste. As indicated within Attachment A-5 of the HWFP "Non-mixed hazardous wastes generated at the WIPP, through activities where contact with TRU mixed waste does not occur, are characterized, placed in containers, and stored (for periods not exceeding the limits specified in 20 NMAC 4.1.300 (incorporating 40 CFR §262.34)) until they are transported off site for treatment and/or disposal at a permitted facility. This waste generation and accumulation activity, when performed in compliance with 20 NMAC 4.1.300 (incorporating 40 Part CFR §262), is not subject to RCRA permitting requirements and, as such, is not addressed in the permit."

The personnel dealing with site generated waste no longer have dual responsibilities and, as a consequence, all job activities are now outside the regulatory realm of the current permit. The former HWFP responsibilities of Non-TRU Waste Handlers dealt with transportation. The Waste Operations Administrative Assistant has been renamed the Transportation Engineer and the transportation related responsibilities of the Non-TRU Waste Handler have been assigned to this position. The Permit related responsibilities, education/experience and training requirements for both the Non-TRU Waste Handler and the Waste Operations Administrative Assistant have been absorbed by the transportation engineer.