WIPP/NMED Resource Planning Meeting

May 7, 2002

- Meeting Objectives
  - Discuss improvements made to audit program
  - Review resource requirements to support audit and PMR schedules
  - Determine how resource plan and schedules will be developed and implemented

- Implementation of audit program improvements (Calvert)

- Review audit schedule and evaluate resource requirements

- Review PMR schedule and descriptions and evaluate resource requirements

- Discuss development of a resource plan and schedule
## CARLSBAD FIELD OFFICE
### ASSESSMENT SCHEDULE
#### APRIL 2002

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## Tentative Assessment Teams

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04/25/2002 - 8:19 AM
AUDIT PROCESS

5.1.1 CAO QA Manager

Combined Assessment
Schedules

5.1.4 CAO Manager

Approve Assessment
Schedule

5.1.2 Assurance TL

Evaluate Audit
Frequency, Evaluate
Need for Supplemental
Audits

Personnel Selection

5.2.1 Responsible TL

Audit Team Leader Selected

5.2.2 - 5.2.4 Audit TL

Select Audit Team
Members Review
Qualifications

5.3.1 & 5.3.2 Audit TL

Audit Plan and
Notification Letter

5.3.4 Audit TL/AT

Perform Orientation,
Prepare Audit Plan, Audit
Notification and Audit
Checklist. Transmit Audit
Plan and Notification to
Assurance TL for Review
and Concurrence

5.3.5 Audit TL/AT

Perform Audit and
Complete Audit Checklist(s)

5.4.1 Audit TL

Conduct the Preaudit
Conference

5.4.2 - 5.4.12 Audit TL

Approve Audit
Checklist

5.4.12 Audit TL

Meet with the Audited
Organization's
Management

5.4.15 - 5.4.16 Audit TL

Conduct Postaudit
Conference

5.5 Audit TL

Prepare Audit Report and
Any Corrective Action
Report(s). Transmit to
QA Records

Assurance TL

Review/Concur with
Audit Report and Sign
Corrective Action
Reports. Distribute Audit
Report and Any CARs.
Transmit Audit Report and
CARs to the Audited
Organization

Follow-up and
Closeout

5.6 In Accordance with
MP 3.1

CAO QA Manager

Review, Concur and
Transmit

Legend

TL - Team Leader
AM - Assistant Manager
AT - Audit Team
CORRECTIVE ACTION REPORT PROCESS

5.1.1 CAR Initiator Identify CAQ

5.1.2 CATL, ITL or AM Review CAR for Validity

5.1.3 Return to Initiator With Explanation Why CAQ is Invalid

5.1.4 "Invalid"

5.1.5 Related to Currently Certified Process at TRU Waste Site?

5.1.6 Transportation Related?

5.1.7 CATL, ITL, or AM Assign Corrective Action Response Due Date

5.2 RO Write C/A Response and forward to CATL, ITL, or AM

5.3 CATL, ITL, or AM Monitor Timeliness and Approve Extensions

5.4 CATL, ITL, or AM Notify RO of CAP approval/disapproval Monitor Status

5.5 RO Implement Corrective Actions. Notify CBFO of completion

5.6 CATL and ITL, or AM CAV verify completion of C/A and assign trend cause code QAM close CAR

5.9 CATL, ITL, or AM Assign Corrective Action Completion Date NMT 30 Days From CAR Issuance

5.9.1 RO Write C/A Response and forward to CATL, ITL, or AM

5.9.2 CATL, ITL, or AM Monitor Timeliness

5.9.3 RO Provided detailed justification for request for extension of C/A completion date beyond 30 days

5.9.4 CATL, ITL, or AM Recommend Suspension of Site Certification to CFOM

5.9.5 RO Approve requests to extend C/A completion date beyond 30 days

5.9.6 CAV and CATL, ITL, or AM CAV verify completion of C/A and assign trend cause code QAM close CAR

5.9.7 CFOM Approve requests to extend C/A completion date beyond 30 days

5.9.8 RO Suspend Certification

5.9.9 NO

Legend

AM - Assistant Manager
CAQ - Condition Adverse to Quality
CATL - CBFO Assessment Team Leader
CIA - Corrective Action
CAR - Corrective Action Report
CARI - CAR Initiator
CFOM - Carlsbad Field Office Manager
CCOR - CAR Coordinator
CAV - Corrective Action Verifier
ITL - Initiating Team Leader
NMT - No More Than
NTP - National TRU Program
QAPD - QA Program Document
QAM - Quality Assurance Manager
RCRA - RCRA Related Deficiency
RO - Responsible Organization
SCAQ - Significant Condition Adverse to Quality
WSR - Work Suspension Recommendation

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Notes:
- PCB study dependent upon final EPA decision.
- Lack of lawsuit priorities.
## PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
<thead>
<tr>
<th>Name:</th>
<th>Remove Booster Fans</th>
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<tbody>
<tr>
<td>Submittal Date:</td>
<td>May 2002</td>
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<tr>
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<td>Justification for Classification (40 CFR 270.42 Appendix I): A.8</td>
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</table>

### Affected Portions of HWFP:
- Attachments F-4d, M2-2a(3), and M2-2b

### Describe Change:
Remove three underground booster fans that allow for reversal of airflow in the mining area.

### Basis for Change:
- The booster fans are no longer used to support the mine ventilation system. Booster fans were originally installed to maintain sufficient airflow to provide adequate oxygen in accordance with 30 CFR 57.5015 during construction of the facility when only the exhaust filter building fans were available to provide ventilation. Following installation of the main ventilation fans, the booster fans no longer served this purpose.
- Air flow reversal is no longer appropriate due to completion of the underground drifts and the process of directing exhaust fumes.
- MSHA requires one of the following:
  - Control doors
  - Ventilation reversal
  - Effective evacuation procedures
- WIPP currently complies with MSHA through availability of control doors and evacuation procedures.
- The proposal to remove the underground booster fans has been reviewed and approved by MSHA as well as the New Mexico Bureau of Mine Inspection.

### Impact if Requested Change is not Approved:
Safety of personnel could be compromised if the change is not approved. If operated during a fire, the fans could move toxic gases in the direction of personnel.

### Status:
PMR is being developed

### When the PMR needs to be implemented:
This change is not tied to any other event.

* Extensiveness Rating relates to the number of changes to the permit, as well as the number of sections affected.
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## PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
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<thead>
<tr>
<th>Affected Portions of HWFP:</th>
<th>Describe Change:</th>
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</thead>
<tbody>
<tr>
<td>Attachment F, Table F-6, Figure F-5</td>
<td>An annual review of the Contingency Plan (mandated by the HWFP, Attachment F, Section F-9) identified several changes that are necessary to clarify equipment and facility locations, relocate emergency equipment, and bases for change:</td>
</tr>
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</table>

### Basis for Change:

These proposed changes are necessary for the Contingency Plan to be accurate and contain useful information.

1.) Correct a typographical error (Remove the double negative) related to opening off-site waste containers.
2.) State Emergency Response Commission, Department of Public Safety WIPP Coordinator, and National Response Center contact numbers identified in the HWFP are out of date.
3.) Update the description of the WIPP Plant Base Radio to reflect that the UHF is no longer used, however 2-way radio communication is available. And, remove the brand name of the monitor/defibrillators on Ambulance #1 and #2. WIPP now has a different and better brand of monitor/defibrillator.
4.) Change the location of spill response equipment, radiation monitoring equipment, and underground portable eyewash stations and clarify the term “station” as used to reference equipment locations at the shafts. Spill Response Equipment will be move to Building 481 to facilitate access in the event of a spill in the WHB. Radiation monitoring equipment will be moved to Building 412 to facilitate access by radiation control technicians. Eye wash stations will be relocate to locations where they may be used. The definition of "station" is any programmed stopping point of the hoist conveyance. This change will clarify the equipment location at a "station" to be either the collar (surface) or underground stations.
5.) Update the Hazardous Materials Incident Form in Figure F-12. Sections of the form previously completed by Environmental Compliance and Support and Hazardous Waste Operations is now completed by Environmental Compliance.
6.) The function of the alternate EOC has been moved from the Living Desert State Park to the Skeen-Whitlock Building. The same information and resources are available in the event they are necessary.
7.) The functions of Environmental Compliance & Support and Hazardous Waste Operations have combined under Environmental Compliance.
8.) The underground fire alarms at fuel station #2 implies that there may be additional fuel stations in the underground without fire alarms. This change will clarify that only one fuel station exist in the underground.

### Impact if Requested Change is not Approved:

1.) The permit will be incorrect, implying that all containers must be opened at the WIPP.
2.) Phone numbers of contact organizations will be incorrect.
3.) WIPP will be required to maintain obsolete systems.
4.) Emergency Equipment may not be readily available when needed. Emergency equipment referenced at a "station" would need to be installed at each "station" for the referenced shaft.
5.) Figure F-12 in the Hazardous Waste Facility Permit will not be up to date.
6.) The Alternate EOC will remain at the Living Desert State Park.
7.) The permit will reference organizations that no longer function under the names in the permit.
8.) The permit would continue to reference fuel station #2 in the underground when only one fuel station is located in the underground.

### Status: PMN has been drafted.

**When the PMR needs to be implemented:**

Change is necessary as soon as possible to ensure the Contingency Plan is up to date.

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DRAFT FOR DISCUSSION PURPOSES ONLY

PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
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<th>Name: Control Charting</th>
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<tr>
<td>Affected Portions of HWFP: Module II and Attachments B, B1, B2, and B6</td>
<td>Describe Change:: The modifications will provide options for waste analyses activities being conducted at generator/storage sites that send waste for management and disposal at WIPP.</td>
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<td>Basis for Change: The language in the WIPP HWFP is ambiguous with regard to the sample size required for retrievably stored homogeneous solids that are repackaged. In order to resolve this ambiguity, two changes are needed to the permit in this modification. First, the language in B-3d needs to be changed to be consistent with the statement in B-3d(2), thereby eliminating part of the ambiguity. This change assures that if a generator knows that control charts are not appropriate for a repackaged retrievably stored waste, the generator does not have to pursue that option. Second, the phrase in Section B-3d(2): “whichever results in the greater sampling requirements” is clarified to eliminate the remainder of the ambiguity. The permit requires that waste streams be representatively sampled. The maximum number of samples required to achieve representativeness is defined by the statistical approach in Section B2-2a. If a generator/storage site can control chart a repackaged waste stream, then the benefits of reduced sampling that accompany control charting are available. Otherwise, the generator/storage site can opt for the requirements for representative sampling as found in Attachment B2-2a.</td>
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Impact if Requested Change is not Approved: Generator sites will have to continue to over sample waste streams to demonstrate that control charting is not beneficial. Excess samples cost about $15,000 each to obtain and analyze. Sites may be forced to take 10 extra samples for each waste stream at a cost of $150,000 per waste stream.

Status: PMR has been developed

When the PMR needs to be implemented: This Change is not tied to any other event

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**PERMIT MODIFICATION REQUEST (PMR) PROFILE**

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**Affected Portions of HWFP:**
- Attachments B, B1, B2, B4, B6

**Describe Change:**
- Visual Verification

**Basis for Change:**
- The WIPP HWFP establishes different waste characterization requirements for newly generated and retrievably stored waste. When waste is initially packaged or when retrievably stored waste must be repackaged, generator/storage sites are required by the WIPP HWFP to use Visual Verification (VE). Generator/storage sites have identified circumstances when it is more appropriate to do post-packaging confirmation of AK using radiography instead of verifying AK at the time of packaging.
- This modification will allow either Visual Verification or radiography to be used to confirm AK.
- If this modification is approved, generators will still be required to document the contents of a container of waste as it is being filled. This is an important aspect of the AK generation process. However, the AK developed during waste generation and repackaging will be confirmed either through a second operator visually confirming the results of this first operator or by post-packaging radiography.

**Impact if Requested Change is not Approved:**
1) Generator sites will experience delays in packaging of newly generated waste due to insufficient personnel to staff multiple Visual Examination activities in multiple locations.
2) Generator sites would have to perform visual verification on newly generated wastes during packaging. They would not have the flexibility to use radiography at a later time to confirm acceptable knowledge.

**Status:** PMR has been developed.

**When the PMR needs to be implemented:**
This change request is not tied to any other event.

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<td>Describe Change: Data Management</td>
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**Basis for Change:**
- Add the option for electronic data review, validation, and verification
- Revise reviewer responsibilities
- Eliminate Waste Stream Characterization Package
- Eliminate repeat of quarterly data review
- Consolidation and reorganization of data management portions of permit (Attachments B and B3)
- Allow use of barcodes instead of sample tags or labels (applies to samples only, not waste containers)
- Allow use of electronic records

**Impact if Requested Change is not Approved:**
WIPP HWFP will continue to have confusing and redundant language; generator sites will not be able to use electronic data and will have to perform redundant data reviews that do not improve the overall data quality.

**Status:** PMR has been developed

**When the PMR needs to be implemented:**
This change is not tied to any other event.

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### DRAFT FOR DISCUSSION PURPOSES ONLY
PERMIT MODIFICATION REQUEST (PMR) PROFILE

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<th>Describe Change:: This modification will incorporate recordkeeping and audit requirements for classified information.</th>
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#### Basis for Change:
- Inventory of waste destined for disposal at WIPP includes some waste that has associated classified information. This information is classified for national security reasons. The waste with associated classified information is TRU waste that has not been physically altered to remove its classified characteristics. DOE has determined that permanent disposal at WIPP is an appropriate disposition for this waste.
- This waste will be characterized in accordance with the WIPP Waste Analysis Plan and will meet the WIPP Waste Acceptance Criteria.
- Waste management activities will remain the same.
- No changes to the Contingency Plan are required.
- Procedures for maintaining the operating record must be modified to accommodate the national security concerns associated with classified information:
  - Radiography tape review and storage – tapes to be reviewed at Sandia and returned to generator site for storage
  - Disposition of classified information
  - Waste characterization information retrievability
- Audit records and access to classified information – classified information can’t be included in audit reports. Auditors must be “Q” cleared to view classified information:

#### Impact if Requested Change is not Approved:
Waste containing classified materials will not be disposed at WIPP until the procedures for maintaining the records for these waste addresses the national security concerns associated with classified information.

### Status:
- PMR has been developed

### When the PMR needs to be implemented:
- Rocky Flats is scheduled to close an area with classified records in June 2002.

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PERMIT MODIFICATION REQUEST (PMR) PROFILE

Name: HalfPACT

Proposed Classification: 2

Affected Portions of HWFP:
Module II.A, III.A.1 and IV.A, Attachments A, B, C, D, E, F, G, J, M1, M2

Basis for Change:
- The Department of Transportation (DOT) regulates shipping containers used to transport wastes. The DOT requires the use of Nuclear Regulatory Commission (NRC) certified shipping containers. The HalfPACT has been received NRC certification.
- The DOT regulates the weight of tractor/trailers on US Highways. The HalfPACT will increase the shipping efficiency by allowing greater flexibility in the waste loading to comply with DOT weight restrictions.
- Allow the use of HalfPACT shipping containers for waste management to the WIPP facility in addition to the currently permitted TRUPACT-II.
- Add the general term “Contact Handled Packaging” to the Permit. This term is defined to include both empty TRUPACT-lls and empty HalfPACTs, or a component thereof.
- Add the general term “Contact Handled Package” to the Permit. This term is defined to include both TRUPACT-IIIs and HalfPACTs and their contents.
- As appropriate, specific references to TRUPACT-II are replaced by Contact Handled Packaging or Contact Handled Package to be inclusive of all packaging types (i.e. TRUPACT-II and HalfPACTS).
- This permit modification request does not change any container storage capacities found in the WIPP HWFP. However, storage capacities in the WIPP HWFP that refer to specific numbers of TRUPACT-IIIs have been changed to their volumetric equivalent waste storage capacities to reflect that either TRUPACT-IIIs or HalfPACTs may be used.

Describe Change:
Replace the term Transuranic Package Transporter (TRUPACT-11) with the term Contact Handling Packaging and include the HalfPACT in the definition of this term.

Impact if Requested Change is not Approved:
TRU waste transportation will be less efficient than if the modification were approved.

Status: PMR has been developed.

When the PMR needs to be implemented:
HalfPact production is scheduled to start in April 2002 with the first HalfPACT being delivered to the project in September 2002. Delay of this modification could result in the HalfPACT's sitting idle until the modification is approved.

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<th>Submittal Date:</th>
<th>Extensiveness Rating*:</th>
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<tr>
<td>Add U134</td>
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**Proposed Classification:** 2

**Justification for Classification (40 CFR 270.42 Appendix I):** F.3.b.

**Affected Portions of HWFP:**
- Module II.C.4 and Attachments B3 & O

**Describe Change:**
- Add U134 as a New Hazardous Waste Number.

**Basis for Change:**
- U134 is the listed code associated with unused or off-specification hydrofluoric acid, although assignment of the U134 code does not mean that the waste exhibits the characteristic of corrosivity associated with hydrofluoric acid. At INEEL, hydrofluoric acid is complexed with aluminum nitrate to form a non-corrosive aluminum fluoride complex.
- The waste meets the WIPP Waste Acceptance Criteria and will be characterized in accordance with the WIPP Waste Analysis Plan.
- INEEL currently has debris contaminated with waste that has been assigned the U134 code due to the RCRA mixture and derived from rules.
- In order to dispose of waste carrying the U134 code at WIPP, U134 must be added to the Permit.
- No additional or different waste management practices at WIPP will be required.
- The waste will be certified through acceptable knowledge, testing, and/or analysis that it no longer exhibits the characteristic of corrosivity. This is confirmed by assuring that no liquid waste is present.

**Impact if Requested Change is not Approved:**
- WIPP will not be able to receive part of INEEL’s TRU mixed waste inventory (Approximately 100 cubic meters).

**Status:** PMR has been developed

**When the PMR needs to be implemented:**
- This change is not tied to any other event.

* - Extensiveness Rating relates to the number of changes to the permit, as well as the number of sections affected.
† - Complexity Rating relates to the technical complexity of the PMR. This is unrelated to the Extensiveness Rating, e.g., a PMR can have a large number of changes to the permit but not be technically complex.
### DRAFT FOR DISCUSSION PURPOSES ONLY
### PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
<thead>
<tr>
<th>Name: RH WAP and Facility</th>
<th>Submittal Date: May 2002</th>
<th>Extensiveness Rating*: 5</th>
<th>Complexity Rating†: 5</th>
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<tbody>
<tr>
<td>Proposed Classification:</td>
<td>Justification for Classification (40 CFR 270.42 Appendix I):</td>
<td></td>
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</tr>
</tbody>
</table>

**Affected Portions of HWFP:**
- Modules I, II, III, IV and
- Attachments A, BR, BR1, BR2,
- BR3, BR4, BR5, C-1, D, E, F, G, I3

**Describe Change:**
- This modification will allow WIPP to receive/dispose of RH wastes

**Basis for Change:**
- The HWFP currently prohibits storage and disposal of Remote Handled TRU mixed waste. In this Class 3 PMR, DOE seeks to remove the prohibition on receipt of RH TRU waste and continue with its mission of disposing defense-generated TRU waste.
- Define the facility configuration and process.
- Define a RH WAP.

**Impact if Requested Change is not Approved:**
- WIPP will not be able to fulfill its regulatory mission to dispose of RH TRU waste. Some sites will face regulatory fines and penalties for failing to meet closure orders.

**Status:**
- PMR is being finalized.

**When the PMR needs to be implemented:**
- This modification is tied to the Recertification blackout period which requires this request to be submitted by November 2002.

---

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### PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
<thead>
<tr>
<th>Name:</th>
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<th>Submittal Date:</th>
<th>Extensiveness Rating*: 2</th>
<th>Complexity Rating†: 1</th>
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</table>

**Affected Portions of HWFP:**
- Module II.C.3.f, Attachment B-1c, B-3a(2), B-3d(1)(a), B1-2a(2), Table B1-4, Table B3-6, and Table B6

**Describe Change:**
- Remove Prohibition on Acceptance of PCBs. Also remove references to analysis for PCB's.

**Basis for Change:**
1. Remove prohibition on PCBs contamination greater than 50 ppm from the permit.
2. Remove references to analysis and sampling for PCBs to allow compliance with waste characterization requirements in 40 CFR 761, Toxic Substances Control Act Regulations for Polychlorinated Biphenyls.

**Impact if Requested Change is not Approved:**
1. TSCA regulated TRU-waste could not be disposed at WIPP. In addition, the DOE Blue Ribbon Panel would have to find another disposal/treatment option.
2. The Permit will require that unnecessary analysis be performed on wastes.

**Status:** TSCA Initial Report submitted to EPA Region VI on 3/22/02, PMR is being drafted.

**When the PMR needs to be implemented:**
Change should be submitted upon receipt of EPA TSCA approval.

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<table>
<thead>
<tr>
<th>Name: Inspection (Forklift)</th>
<th>Submittal Date: September 2002</th>
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<tr>
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<td>Extensiveness Rating*: 1</td>
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<tr>
<td></td>
<td>Complexity Rating†: 1</td>
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<td>Justification for Classification (40 CFR 270.42 Appendix I): A.1</td>
<td></td>
</tr>
</tbody>
</table>

**Affected Portions of HWFP:** Attachment D, Table D-1

**Describe Change:**
Replace reference to three separate electric forklift inspection procedures with one procedure.

**Basis for Change:**
- Replace procedures: WP 05-WH1401 "6-Ton Electric Forklift 74-H-010A&B", WP 05-WH1402 "13-Ton Electric Forklifts 41-H-012A&B", and WP 05-WH1403 "3-Ton Electric Forklift 41-H-009" with WP 05-WH1413 "Electric Forklifts" (a generic procedure for inspections of electric forklifts). This change will streamline and improve the inspection of electric forklifts by standardizing these inspections in a single procedure.

**Impact if Requested Change is not Approved:**
If this change is not approved, Waste Handling will be slowed from continuing to improve procedures and will be unable to reduce the amount of unnecessary procedures that Waste Handling is accountable for. Without this change, Waste Handling will continue to have to do annual reviews of three procedures instead on one comprehensive procedure.

**Status:** PMN is being developed for submittal.

**When the PMR needs to be implemented:**
This request is not tied to any other events.

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## Name:
Container Descriptions

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|-------------------------------------------------------------------------|

<table>
<thead>
<tr>
<th>Affected Portions of HWFP: Attachment B-4b(2)(iii)</th>
<th>Describe Change: Clarify information to be provided on the Manifest</th>
</tr>
</thead>
</table>

### Basis for Change:
- Change wording in Attachment B from “container number” to “TRUPACT number” to clarify what information is on the shipping documents

### Impact if Requested Change is not Approved:
NMED may require that generator sites enter the individual container number(s) for the SWB, TDOP or other overpacked containers on the manifest or other shipping papers.

### Status:
Request is being formalized.

### When the PMR needs to be implemented:
This change is not tied to any other event.

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**PERMIT MODIFICATION REQUEST (PMR) PROFILE**

<table>
<thead>
<tr>
<th>Name:</th>
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</tr>
<tr>
<td>Justification for Classification (40 CFR 270.42 Appendix I):</td>
<td>270.42(d)</td>
</tr>
</tbody>
</table>

| Affected Portions of HWFP: | Module II and Attachments la, lb, and lc                                                |
| Describe Change:           | This modification will request a change to the panel closure system design.              |

**Basis for Change:**  
- CBFO and WTS are continuing their evaluation of the panel closure system specified in the WIPP HWFP. If a redesign of the closure system is necessary, the Permittees will submit a Class 3 permit modification requesting approval of an amended closure plan that includes the redesigned system. The amended closure plan would include a revised schedule of the activities required to complete installation of the proposed closure system.  
- If the Permittees determine it is appropriate, the permit modification request will be submitted in September or October 2002. This submittal schedule will allow time for completion of design activities as well as development of a permit modification request.  
- Current schedules project that Panel 1 will be full in approximately January 2003. In accordance with the currently permitted closure plan, WIPP needs to notify NMED of the intent to close Panel 1 30 days prior to receipt of the last waste in Panel 1. This notification is likely to occur in December 2002.  
- If the Class 3 permit modification request has not been approved by December 2002, it is our understanding that the currently approved closure plan is held in abeyance until such time that a decision regarding the permit modification request occurs, which we believe is consistent with other closures in New Mexico.

**Impact if Requested Change is not Approved:**  
The most expensive option for a panel closure will be used for all panels. In addition, an opportunity to collect actual repository performance data may be missed.

**Status:**  
Technical plans are being reviewed.

**When the PMR needs to be implemented:**  
This PMR will be submitted prior to the start of closure for panel 1, currently scheduled to begin January 2003.

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### PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
<thead>
<tr>
<th>Name:</th>
<th>Submittal Date:</th>
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<th>Complexity Rating:</th>
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<tr>
<td>Add F039</td>
<td>October 2002</td>
<td>1</td>
<td>1</td>
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<table>
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<tr>
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<th>Justification for Classification (40 CFR 270.42 Appendix I):</th>
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<tbody>
<tr>
<td>2</td>
<td>F.3.b.</td>
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<table>
<thead>
<tr>
<th>Affected Portions of HWFP:</th>
<th>Describe Change:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module II.C.4 and Attachments B3 &amp; O</td>
<td>Add F039 as a New Hazardous Waste Number.</td>
</tr>
</tbody>
</table>

**Basis for Change:**
- F039 is the listed code associated leachate from a hazardous waste storage area or landfill.
- The waste meets the WIPP Waste Acceptance Criteria and will be characterized in accordance with the WIPP Waste Analysis Plan.
- INEEL anticipates generating wastes that will be assigned the F039 code.
- These wastes will be generated as a result of the retrieval of buried TRU waste from the Rocky Flats Plant.
- In order to dispose of waste carrying the F039 code at WIPP, F039 must be added to the Permit.
- No additional or different waste management practices at WIPP will be required.

**Impact if Requested Change is not Approved:**
WIPP will not be able to receive part of INEEL's TRU mixed waste inventory (Approximately 100 cubic meters).

**Status:** Request is being formalized.

**When the PMR needs to be implemented:**
The first retrieval generating the F039 waste at INEEL is anticipated to occur in October 2003. Thus, inclusion of this code in the WIPP permit will remove a potential hurdle in ultimately getting the waste certified for acceptance.

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**Name:** Analyte  
**Proposed Classification:** 2  
**Justification for Classification (40 CFR 270.42 Appendix I):** A.2, B.1.d.

<table>
<thead>
<tr>
<th><strong>Affected Portions of HWFP:</strong></th>
<th><strong>Describe Change:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Module V and Attachments B, B3, and L</td>
<td>Remove cis-1,2-dichloroethylene as a Required Analytical Parameter</td>
</tr>
</tbody>
</table>

**Basis for Change:**

- The listing of cis-1,2-dichloroethylene as either a target analyte or groundwater monitoring parameter is not required by State or Federal regulations. Neither 20.4.1.200 NMAC (incorporating 40 CFR Part 261, Appendix VIII) nor 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Appendix IX) list cis-1,2-dichloroethylene as a hazardous constituent nor a groundwater monitoring parameter. The generator/storage sites currently analyze for cis-1,2-dichloroethylene as well as trans-1,2-dichloroethylene. Trans-1,2-dichloroethylene is listed in both Appendices VIII and IX.

**Impact if Requested Change is not Approved:**
Generator/storage sites were performing analysis not required by federal or state regulations thus incurring additional costs and analytical process time.

**Status:** PMR has been developed

**When the PMR needs to be implemented:**
This change is not tied to any other event.
## PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
<thead>
<tr>
<th>Name:</th>
<th>Submittal Date:</th>
<th>Extensiveness Rating:</th>
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<tr>
<td>Training Overhaul</td>
<td>October 2002</td>
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<td>2</td>
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### Justification for Classification (40 CFR 270.42 Appendix I): B.5.a

<table>
<thead>
<tr>
<th>Affected Portions of HWFP:</th>
<th>Describe Change:</th>
</tr>
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<tbody>
<tr>
<td>TOC; Module II; Attachments H, H1 and H2</td>
<td>Revision of the Training Plan (Attachments H, H1, and H2) modeling the Triassic Park Waste Disposal Facility Permit No. NM0001002484.</td>
</tr>
</tbody>
</table>

### Basis for Change:
- The current Hazardous Waste Facility Permit (HWFP), Training Plan, prescribes required elements and details of the WIPP training program. Most of which are required by RCRA regulations, however these regulations allow many of the elements and details in the WIPP HWFP, Training Plan, to be included in the facility operating record (40 CFR § 264.16 [d][1-4]) as opposed to a HWFP (40 CFR § 270.14[b][12]).
- These elements and details include 33 job titles/functions with required courses/prerequisite skills, 30 course descriptions with a detailed outline of the content for each, and 17 qualification cards detailing knowledge requirements for each position requiring a card. Inclusion of these elements and details in the WIPP HWFP, Training Plan, impedes the facility's ability to maintain state of the art training program by requiring a HWFP modification prior to implementing any changes to the training program. For example, if WTS/CBFO wanted to eliminate the First Line Initial Response Team (FLIRT) and roll their responsibilities into the Emergency Response Team (ERT) or if they wanted to expand the role of the Mine Rescue Team (MRT) to include fire fighting, a permit modification would be necessary. Several courses, such as GET, could be shortened to eliminate/reduce unnecessary elements like Stormwater Management or increased to account for additional security considerations in light of Sept 11, 2001. In addition, several courses might benefit from new computer based or on the job training techniques. The WIPP training program currently lacks the flexibility to implement or evaluate other options to training personnel.
- This change will allow WIPP the same flexibility in training employees as other facilities permitted in New Mexico by modeling the Triassic Park Waste Disposal Facility Permit No. NM0001002484, Attachment E. Furthermore, this change will decrease the number of future permit modifications required to update the Training Plan.
- The permittees will continue to maintain all of the required information in the operating record at the facility in accordance with 40 CFR § 264.16(d).

### Impact if Requested Change is not Approved:
If this change is not approved, the permittees will continue to request a significant number of changes to the permit related to organizational structure, course outline and context, and personnel skill/requisite training. These subsequent requests will impede the facility's ability to take effective and timely advantage of new technologies or lessons learned, or respond to other related regulatory drivers, which will result in higher costs than should be necessary.

### Status:
Initial request is being formalized

### When the PMR needs to be implemented:
This is not tied to other events, however changes are necessary to the training plan that may require other modification if this is not implemented.

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DRAFT FOR DISCUSSION PURPOSES ONLY
PERMIT MODIFICATION REQUEST (PMR) PROFILE

Name: Containers/Storage

Submittal Date: October 2002
Extensiveness Rating*: 4
Complexity Rating†: 2

Proposed Classification: 2

Justification for Classification (40 CFR 270.42 Appendix I): F.2.a

Affected Portions of HWFP:
- Modules III.C.1, IV.C.1 and Attachments B, D, E, F, G, I, J, J1, M1, and M2

Describe Change:
- Consolidate permit container descriptions, add 100 gallon drums, and allow direct loaded TOOP.

Basis for Change:
- This permit modification request would consolidate or remove numerous references to containers from the attachments. These references include receipt of Contact Handled (CH) Transuranic (TRU) wastes, contents of Contact Handled Packages/TRUPACT-II's, and contents of facility pallets. Where necessary, the container list in the permit will be replaced with a reference location describing the containers (M1-1b).
- This permit modification request would also add container descriptions for 100 gallon drums and direct loading of Ten Drum Overpack (TDOP). Both container configurations meet the DOT 7A Standards and are identified in the TRUPACT and HalfPACT container certifications. This modification will not seek an increase to the permitted waste volume limits for storage or disposal as a result of the TDOP, however, the Waste Handling procedures and inspections will ensure compliance with the waste volume storage limits in the permit. In addition, no change is necessary to the descriptions of secondary containment as they are based on the current maximum volume limitations and the one percent by volume container limit. Volume limit increase and secondary containment will be addressed as part of the storage volume increase request, if approved.

Impact if Requested Change is not Approved:
Unclear language in the permit could lead to significantly different interpretations for implementation between the permittees and New Mexico Environment Department (NMED). Theoretically, NMED could choose to enforce container restrictions specified in applicable sections of the permit because of permit language. In addition, generator sites may be unable to ship some of the large debris wastes without reducing the size potentially exposing workers to unnecessary radiation, which may impact agreement that the Department of Energy has with state governments at sites such as Rocky Flats and Idaho.

Status: This request is being formalized

When the PMR needs to be implemented:
This change will allow INEEL (Advanced Mixed Waste Facility) to ship larger debris wastes in direct loaded TDOP. The Advanced Mixed Waste Facility is scheduled to start operations in December 2003.

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# PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
<thead>
<tr>
<th>Name: Contingency Plan</th>
<th>Submittal Date: October 2002</th>
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<td>Justification for Classification (40 CFR 270.42 Appendix I): B.6.a&amp;c</td>
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</table>

### Affected Portions of HWFP:
- Attachments E and F

### Describe Change:
- Revise emergency response and preparedness/prevention procedures

### Basis for Change:
- Revise Attachments E and F to remove unnecessary/duplicated details (e.g. three sections of text referring to reporting to agencies, the number of band-aids on an ambulance, organization charts), update emergency response information, remove outdated definitions and reduce redundancy.

### Impact if Requested Change is not Approved:
The contingency plan will continue to reference outdated terms and definitions. In addition, the plan may not adequately address an emergency response during certain activities or involving hazardous materials not currently identified in the contingency plan.

### Status:
- This request is not fully developed.

### When the PMR needs to be implemented:
- This request is not tied to any other events.

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**PERMIT MODIFICATION REQUEST (PMR) PROFILE**

<table>
<thead>
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<td></td>
<td>Complexity Rating†: 4</td>
</tr>
<tr>
<td><strong>Affected Portions of HWFP:</strong> Modules I, II, and IV and Attachments B, B1, B3, B6, and N</td>
<td><strong>Describe Change:</strong> This PMR will change the way in which VOC concentrations in HSG are determined and assigned to individual containers.</td>
</tr>
<tr>
<td><strong>Basis for Change:</strong></td>
<td><strong>Justification for Classification (40 CFR 270.42 Appendix I): 270.42(d)</strong></td>
</tr>
</tbody>
</table>

WIPP's Waste Analysis Plan (WAP) requires TRU waste generator/storage sites to measure the type and concentration of volatile organic compounds (VOCs) in the headspace gas (HSG) of each container of waste destined for WIPP. As set forth in the WAP, HSG measurements ensure WIPP compliance with RCRA environmental performance standards and confirm hazardous waste identification by acceptable knowledge.

Although the WAP includes provisions for reduced HSG sampling and analysis (HSGS&A) for wastes that have been thermally treated and for wastes with no VOC-related hazardous waste codes, most wastes are still subject to the 100% HSGS&A requirements. HSGS&A represents approximately 44% of all TRU waste life cycle characterization costs. It has been estimated that DOE spends $31 million annually on HSGS&A.

Since submission of WIPP’s RCRA permit application in the mid-1990’s, over 6,000 HSG VOC measurements have been made. The data from these measurements indicate that the WAP data quality objectives (DQOs) for VOC-content of TRU waste can be achieved without HSGS&A. The HSG PMR will include a methodology to meet the WAP DQOs by: 1) demonstrating that there is a technical basis to assign VOC properties to each container without HSGS&A, 2) proposing that VOC-related hazardous waste codes can be confirmed without HSGS&A of each container, and 3) that the per-drum assignment of VOC concentrations will be conservative.

**Impact if Requested Change is not Approved:**
The TRU waste complex will not gain time or cost savings relative to waste characterization.

**Status:** PMR is being developed

**When the PMR needs to be implemented:**
This change is not tied to any other event.

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### PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
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#### Proposed Classification:

- 3

#### Justification for Classification (40 CFR 270.42 Appendix I):

- D.1, 270.42(b)(6)(i)(C)(2)

#### Affected Portions of HWFP:

- Module II and Attachments B-1c, B-3c, B-3d(2), B-4a(1), B1, B1-3, B2, B2-1, B3-1, B3-4, B3-9, B3-10a, B3-

#### Describe Change:

- Allow Digital Radiography and Computed Tomography as an Alternative to Visual Examination for Performing Quality Control of Radiography.

#### Basis for Change:

- The WIPP HWFP currently requires that a statistically selected portion of the radiographed waste containers be opened and visually examined as a QC check of radiography. This QC check of radiography is one of the uses for VE in the WIPP HWFP and is the only use addressed by this PMR. As a QC check of radiography, VE assesses the effectiveness of radiography in determining both (1) the physical form of the waste and (2) the absence of prohibited items.
- Recent improvements in technology now make it possible to perform these assessments without opening the containers, using high-resolution DR/CT as an alternative to more invasive techniques. Using DR/CT as an alternative to VE has the benefit of reducing the potential for accidental radiation exposure or releases and reducing the generation of additional TRU mixed waste. Generator sites have estimated they generate a new drum of waste for every three to 20 drums subjected to VE. This may include packaging materials removed from the original drum, contaminated personal protective equipment and decontamination waste.
- This PMR will allow the generator/storage sites to continue using VE in lieu of radiography. When generator/storage sites opt to use the VE technique described in the WIPP HWFP, the sites are not required to perform radiography and are not affected by the change in this PMR.
- In addition, generator/storage sites may have the option to use non-alterable electronic media to record and store the results of radiography or VE. All records required by the WIPP HWFP must still be maintained.

#### Impact if Requested Change is not Approved:

They would not be able to use DR/CT which reduces potential radiation risks to workers. DR/CT will not be an option available to reduce radiation exposure risks to workers during the Visual Examination process and to reduce risks associated with an unplanned radioactive material release.

#### Status:

PMR has been developed.

#### When the PMR needs to be implemented:

This change is not tied to any other event.

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DRAFT FOR DISCUSSION PURPOSES ONLY

PERMIT MODIFICATION REQUEST (PMR) PROFILE

Name: Storage Volume/Derived Waste Area

<table>
<thead>
<tr>
<th>Proposed Classification:</th>
<th>Submittal Date:</th>
<th>Extensiveness Rating*</th>
<th>Complexity Rating†</th>
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</tr>
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Justification for Classification (40 CFR 270.42 Appendix I): F.1.a, F.2.a

Affected Portions of HWFP:
- Modules II and III, Attachments A, D, E, F, G, I, M1, O

Describe Change:
1) Increase the storage capacity of the Parking Area Unit and 2) increase the storage capacity of the Waste Handling Building.

1) Increase the storage capacity of the Parking Area Unit (PAU) from 12 TRUPACTs (1591 cubic feet of TRU Waste) to 102 approved Contact Handled Packages (13,525 cubic feet of TRU Waste [16320 if direct loaded TOOP]).
- Clarify that TRUPACT's and HalfPACT's can be stored directly on the pavement in the Parking Area Unit.
- Include the waste handling building (WHB) air locks and TRUPACT maintenance Facility (TMF) as part of the Parking Area Unit.
- Revise aisle space requirement to allow storage on the ground in a manner consistent with being on the trailer, or storage in groups of up to three with 6 inches between individual contact handled packages and 4 feet between groups of contact handled packages.

2) Consolidate the Northeast Storage, Shielded Storage, and TRUDOCK Storage areas thereby allowing storage on facility pallets at the TRUDOCKs and the storage of manifest discrepant loads in the Northeast Storage area.
- Increase the capacity of the Waste Handling Building to 23 loaded facility pallets and 4 loaded Contact Handled Packages (a total of 6,630 cubic feet [8,000 cubic feet if direct loaded TOOP]).
- Remove the requirement for a specific pallet in the Derived waste storage area. The permit currently has three references to a standard polyethylene drum pallet with a grated deck.

Impact if Requested Change is not Approved:
1) Waste shipments may be delayed or paused in transit. Options for responding to delay include more overtime for workers or added shifts/personnel to process wastes.
2) The storage capacity of the Waste Handling Building will be insufficient to provide continued full support for continued operations in the event of an equipment malfunction or generator/storage site(s) issue(s).

Status: Request is being developed.

When the PMR needs to be implemented:
This change is necessary to support continued increases in shipping rates to meet agreements between generator/storage sites and their host states.

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**Name:** Solids Sampling  
**Proposed Classification:** 3  
**Submittal Date:** January 2003  
**Extensiveness Rating**: 3  
**Complexity Rating**: 3  
**Justification for Classification (40 CFR 270.42 Appendix I):** 270.42(d)

**Affected Portions of HWFP:** Modules I, II, and IV and Attachments B, B1, B3, B6  
**Describe Change:** This proposed change would reduce or eliminate solids sampling and analysis.

**Basis for Change:**
When the DOE prepared its risk assessment for compliance to RCRA for the WIPP, it had two objectives in mind. One was to obtain a no-migration determination (NMD) from the EPA; the other was to obtain an operating permit from the NMED. The requirements for the NMD were by far the more stringent since the facility had to demonstrate releases are below health-based concentrations in soil, water and air for 10,000 years. In order to do this, certain waste characteristics were very important. These included the concentrations of VOCs in the headspace, the concentrations of RCRA compounds in the solid matrix, and the distribution of waste materials such as rubber, cellulosic, plastic, ferrous metals, non-ferrous metals, and the like. The quantification of solids is not needed since the risk assessment shows that there are no pathways from the closed facility during the RCRA timeframe. Since these requirements are not needed, the DOE must now prepare a justification for their removal. The risk assessment in the RCRA permit application will allow the DOE to do this. It applies to the RCRA permit time period and shows that the results of solids samples are of no importance. DOE will have to compensate for the loss of confirmation of hazardous waste code assignment chemical analysis.

**Impact if Requested Change is not Approved:**
Sites will continue to perform work as currently identified; requiring visual examination and its associated exposure; along with the documentation generation and qualification of MPWs by container. Unnecessary exposure and the potential for accidents due to the physical handling of the container contents.

**Status:** PMR is being developed

**When the PMR needs to be implemented:**
This change is not tied to any other event.

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### PERMIT MODIFICATION REQUEST (PMR) PROFILE

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<td>Affected Portions of HWFP:</td>
<td>Modules I, II, and IV and Attachments B, B1, B3, B6</td>
</tr>
<tr>
<td>Describe Change::</td>
<td>This proposed change will change the way in which material parameter weights are estimated.</td>
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</table>

#### Basis for Change:

When the DOE prepared its risk assessment for compliance to RCRA for the WIPP, it had two objectives in mind. One was to obtain a no-migration determination (NMD) from the EPA; the other was to obtain an operating permit from the NMED. The requirements for the NMD were by far the more stringent since the facility had to demonstrate releases are below health-based concentrations in soil, water and air for 10,000 years. In order to do this, certain waste characteristics were very important. These included the concentrations of VOCs in the headspace, the concentrations of RCRA compounds in the solid matrix, and the distribution of waste materials such as rubber, cellulose, plastic, ferrous metals, non-ferrous metals, and the like. These latter compounds are called the material parameters. The DOE proposed to characterize the waste with regard to these compounds and to track the total quantity of the material parameter weights. The permit requires these be estimated on a container basis. Sufficient information can be obtained by estimating them on a waste stream basis since they are only used to validate an assumption that was used in the numerical modeling. The PMR provides an option to estimate these on a waste stream basis using general information about the waste stream.

It is believed that this change will reduce the cost of radiography operations since much of the radiographer’s time is spent estimating the material parameter weights in the container. The reduction in cost has not been quantified.

#### Impact if Requested Change is not Approved:

Sites will continue to perform work as currently identified; requiring visual examination and its associated exposure; along with the documentation generation and qualification of MPWs by container. Unnecessary exposure and the potential for accidents due to the physical handling of the container contents.

#### Status:

PMR is being developed

When the PMR needs to be implemented:

This change is not tied to any other event.

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## PERMIT MODIFICATION REQUEST (PMR) PROFILE

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<td>Ventilation/Flow</td>
<td>January 2003</td>
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<td>A.3, A.4.b, 270.42(d)</td>
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<th>Affected Portions of HWFP:</th>
<th>Describe Change:</th>
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<tr>
<td>Module IV.E.3.b, Attachments F-4d, M2-2a(3), and M2-2b</td>
<td>Revise Ventilation requirements to allow flexibility and increase efficiency.</td>
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</tbody>
</table>

### Basis for Change:

1. The Ventilation Control Bulkheads are currently construction and removal of a ventilation control bulkhead at the exhaust point of each room where waste is emplaced to allow control over the ventilation rate through the active disposal room. A single bulkhead installed at the Panel exit could control meet the required ventilation in an active disposal room. This modification is supported by the ALARA Concept, reducing employee exposure to 1/7th (an estimated 2100-2800 hours per panel).

2. Chain link and brattice cloth barriers described in the permit are used to restrict airflow and access to certain areas. The use of alternate materials accomplishes the same purpose. Tensar can installed in almost 1/10th of the time reducing employee radiation exposure from 15 hours to 2 hours which supports the ALARA Concept.

3. Removal of specific modes of operation will allow more flexible combinations of 700 and 860 fans that will facilitate calibration and maintenance of the exhaust ventilation system during waste emplacement.

4. Correct a typographical error in a previous submittal. Louver style dampers are an option to a sliding gate regulator and not “on” a sliding gate regulator as submitted.

5. Reduced air flow through the active disposal room would meet the requirements of the regulatory drivers found in 30 CFR 57 for mine ventilation. In addition, reduce ventilation can be shown to still protect worker health relative to VOC concentrations (NMED concerns) and oxygen levels (MSHA concerns).

6. This airflow requirement was specified in the original ventilation plan based on three active disposal rooms with leakage through the unused rooms, and does not allow the flexibility to divert air to support one active disposal room and simultaneous mining activity in other parts of the mine. This change will allow WIPP to meet MSHA ventilation requirements during simultaneous waste handling and mining activities.

7. The original ventilation plan specified 60 feet of air flow per minute to ensure the comfort of workers and visitors in the underground and is not driven by any regulatory or safety basis.

### Impact if Requested Change is not Approved:

1. Employees will be exposed to additional radiation and construction hazards as they install and remove VCBs required by the HWFP. Waste emplacement activities will be suspended during the installation and removal of these VCBs. And, WIPP will continue to fund this construction and demolition at approximately $175K each.

2. 15 hours to construct chainlink barricade vs. 2 hours to construct using tensar and preconstructed frames.

3. Maintenance of surface fans, including required airflow checks on the filtration fans will be greatly restricted during waste emplacement activities.

4. A typographical error will not be corrected.

5. Underground operations will be subjected to a standard that conflicts with ongoing operational priorities. The applicable standard is 30 CFR 57.5015 which required a minimum of 19.5% oxygen in all working areas. In areas where diesel equipment is used, specific requirements for each piece are specified under 30 CFR 57.8520.

6. Underground operations will be subjected to a standard which conflicts with ongoing operational priorities hampering the ability to support activities in the non-disposal areas of the repository when waste handling in not in process.

7. Underground Operations will be subjected to a standard which conflicts with ongoing operational priorities.

### Status:

Request is being prepared

When the PMR needs to be implemented:

This change request is not tied to any other events.

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## PERMIT MODIFICATION REQUEST (PMR) PROFILE

<table>
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<th>Name:</th>
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<td>January 2003</td>
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<tr>
<td>Affected Portions of HWFP:</td>
<td>Module VII</td>
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<tr>
<td>Describe Change::</td>
<td>This proposed change would remove the SWMU's currently designated in the HWFP</td>
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</table>

### Basis for Change:
Removing the SWMUs from the permit reduces future liability with regard to these areas once they are closed. In addition, removal reduces permit fees for SWMU ($250/year each) and the administrative burden of plan maintenance and oversight.

### Impact if Requested Change is not Approved:
Liability to close these areas remains. Annual fees of $3750 will continue to be paid to NMED.

### Status:
NFA report is being developed

### When the PMR needs to be implemented:
Change is contingent upon NMED approval of NFA

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