



RSI
Institute For Regulatory Science

5457 Twin Knolls Road, Suite 200, Columbia, MD 21045 USA
Phone: 301-596-1700 Fax: 301-596-1707



May 14, 2002

Steve Zappe
NMED
2905 Rodeo Park Drive
Building 1
Santa Fe, NM 87505

Dear Mr. Zappe:

The Institute for Regulatory Science (RSI) would like to invite you to attend an Information Interactive Workshop regarding the proposed modifications to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit. In order to accommodate as many members of the public as possible, please note that we have made provisions for the same workshop to be held at three different times at the following two locations:

Tuesday, June 4, 2002	9:00 a.m. - 12:00 p.m.	Courtyard Marriot 3347 Cerrillos Road Santa Fe, NM 87505 Telephone: (505) 473-2800
Tuesday, June 4, 2002	5:00 p.m. - 8:00 p.m.	

Thursday, June 6, 2002	5:00 p.m. - 8:00 p.m.	New Mexico State University at Carlsbad Lecture Hall, Room 153 1500 University Drive Carlsbad, NM 88220
-------------------------------	------------------------------	--

This workshop is in response to a request by the Carlsbad Field Office of the U.S. Department of Energy (DOE) to convene one or more Information Interactive Workshop(s) in accordance with RSI policies and procedures. The purpose of the workshop(s) is to present several proposed modifications to an audience consisting of members of the public—especially stakeholders—and solicit their input through comments and questions. We are hoping that you will be a member of that audience. Please note that this is not a public hearing, but a workshop where only the topic of the WIPP draft permit modifications requests will be discussed.

For your convenience, we have enclosed the following:

- Guidance for Stakeholders
 - Registration Form
 - Tentative Agenda
 - Fact Sheet on WIPP Draft Permit Modification Requests, provided by DOE
- (Please note: The complete Draft Permit Modifications Requests can be found on the WIPP website at www.wipp.ws/rcradox/proposedmods.htm)

020521



Steve Zappe
May 14, 2002
Page 2

If you would like to participate in this workshop, please complete the enclosed registration form and return it no later than May 24, 2002, to: Institute for Regulatory Science, 5457 Twin Knolls Road, Suite 200, Columbia, MD 21045, Attention: Sharon D. Jones. You may also reach Ms. Jones by phone at (301) 596-1700; fax at (301) 596-1707; or e-mail at RSI@NARS.org.

We hope that you will take advantage of this opportunity to obtain information and provide your input on the permit modifications requests by attending this important event.

Sincerely,

A handwritten signature in cursive script that reads "A. Alan Moghissi for".

A. Alan Moghissi, Ph.D.
President

AAM:mfb

Enclosures

INSTITUTE FOR REGULATORY SCIENCE

www.nars.org

GUIDANCE FOR STAKEHOLDERS

There is ample evidence suggesting that the participation of stakeholders enhances the outcome of those activities which include scientific and engineering issues. This guide provides rules governing the participation of stakeholders in meetings that address these activities.

All meetings are normally chaired by a senior RSI staff member. All segments of technical meetings, except those designated as executive sessions of peer reviewers and similar activities are open to the public. Stakeholders can attend these meetings, provided the following criteria are met:

1. Consistent with the tradition of professional societies, all attendees must register. All registered individuals will be provided a name tag, which must be worn while attending the meeting. All registrants will receive a registration package, which includes information such as: a list of review criteria for peer review meetings; topics previously agreed upon as being relevant to workshops; and other technical information. As a general rule, there is no registration fee for these meetings.
2. During the meeting, all attendees may ask questions of the speakers. These questions are limited to clarification of specific issues presented by the speaker.
3. A segment of the meeting has been slated for comments by stakeholders. Those making statements should be aware that their comments should be directly related to a specific review criterion or technical topics provided to the audience during the registration. General statements that are not related to these items cannot be permitted.
4. Due to time constraints, lengthy statements should be avoided as there may not be enough time to accommodate all who wish to participate. Therefore, stakeholders designated by the sponsors will be provided specific times with a specific duration in the program to state their case. All other stakeholders wishing to make a statement should limit their statements to only a few minutes to allow as many people as possible to make their concerns and questions known during the time allotted for stakeholders' comments.
5. The Chair of the meeting will be responsible for ensuring that the audience adheres to these requirements.

Institute for Regulatory Science
Interactive Information Workshop
Proposed WIPP Permit Modifications

TENTATIVE AGENDA

Introduction

A. Alan Moghissi, RSI
Betty R. Love, RSI

Description of Draft Permit Modifications

WIPP Project Team

Break

Discussion

WIPP Project Team and
Stakeholders

SUMMARIES OF DRAFT PERMIT MODIFICATION REQUESTS WASTE ISOLATION PILOT PLANT

CLASSIFIED INFORMATION RECORDKEEPING AND AUDIT REQUIREMENTS

This Class 2 permit modification request will incorporate recordkeeping and audit requirements for classified information. The inventory of waste destined for disposal at WIPP includes some waste materials that have associated classified information. The receipt and disposal of classified waste at WIPP requires modification to the procedures related to operating records to accommodate the national security concerns associated with classified information. This proposed modification has no impact on characterization, transportation, or disposal of classified waste. Classified waste will be characterized as required in the Waste Analysis Plan and will meet the WIPP Waste Acceptance Criteria.

ADDITION OF HF (U134) AS A NEW HAZARDOUS WASTE CONSTITUENT

This Class 2 permit modification request will add hydrofluoric acid (HF with the hazardous waste code U134) to the WIPP permit. This modification will not require any additional or different waste management practices at WIPP. Waste with the U134 code will not contain any free liquids and will not exhibit the characteristic of corrosivity. Addition of this constituent is necessary to accommodate waste from the Idaho National Engineering and Environmental Laboratory.

REMOVAL OF UNDERGROUND BOOSTER FANS

This Class 1 permit modification requests removal of three booster fans from the WIPP underground ventilation system. The booster fans allow for reversal of airflow in the mining area in case of an explosion. The Mine Safety and Health Administration (MSHA) requires shaft mines to provide one of the following to control the spread of fire: 1) control doors, 2) reversal of mechanical ventilation, or 3) effective evacuation procedures. WIPP complies with this requirement with control doors and effective evacuation procedures. Consequently, removal of the booster fans would maintain compliance with the MSHA requirement. MSHA and the New Mexico Mine Inspector both agree that removal of these booster fans does not reduce safety in underground operations.

REMOVAL OF CIS-1,2-DICHLOROETHYLENE AS A REQUIRED ANALYTICAL PARAMETER

This permit modification request will remove cis-1,2-dichloroethylene as a required analytical parameter. This compound is not listed as a hazardous waste constituent nor a groundwater monitoring parameter in the state regulations nor in the corresponding Federal regulations (40 CFR 261, Appendix VIII and 40 CFR 264, Appendix IX). The generator/storage sites currently analyze for trans-1,2-dichloroethylene. This isomer is listed in both Appendices VIII and IX mentioned above.

CHARACTERIZATION OF REPACKAGED HOMOGENOUS SOLIDS AS RETRIEVABLY STORED WASTE WITH REGARD TO SOLIDS SAMPLING (CONTROL CHARTING)

This modification will allow the option to characterize repackaged homogenous solids as retrievably stored waste, using representative sampling following the sample size determination in Attachment B2-2a of the Permit. The current WIPP Permit establishes different waste characterization requirements for newly-generated waste and retrievably-stored waste. In the response to comments on the revised draft permit, the NMED indicated that there would be times when a generator could elect to characterize repackaged waste as retrievably stored waste. However, when homogeneous solid waste is repackaged, the WIPP HWFP requires that it be characterized as newly-generated waste. This modification is consistent with the approach required for newly generated soils and gravels in Permit Attachment B-3d(1)(b).

USE OF RADIOGRAPHY FOR NEWLY GENERATED WASTE (VISUAL VERIFICATION)

The WIPP Permit establishes different waste characterization requirements for newly-generated and retrievably-stored wastes. When waste is initially packaged or when retrievably-stored waste must be repackaged, generator/storage sites are required by the WIPP Permit to use Visual Verification (using the visual examination technique). Generator/storage sites have identified circumstances when it is more appropriate to perform post-packaging confirmation of Acceptable Knowledge (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. However, the AK developed during waste generation and repackaging would be confirmed either through a second operator visually confirming the results of this first operator or by post-packaging radiography.

ADDITION OF HALFPACTS

This permit modification request will allow the use of HalfPACT shipping containers for waste management at the WIPP facility in addition to the currently-permitted TRUPACT-II. This modification requests the addition of the general term "*Contact Handled Packaging*" to the Permit. This term is defined to include both empty TRUPACT-IIs and empty HalfPACTs, or a component thereof. It also requests the addition of the general term "*Contact Handled Package*" to the Permit. This term is defined to include both TRUPACT-IIs and HalfPACTs and their contents. Consequently, the request is seeking to replace specific references to TRUPACT-II by Contact Handled Packaging or Contact Handled Package to be more inclusive. This permit modification request does not change any container storage capacities found in the WIPP Permit. This permit modification request changes shipping package storage capacity from the number of packages allowed to an equivalent volume.