AGENDA

10:30  Introductions  Anne deLain W. Clark
10:40  EEG Update  EEG
11:00  NMED Update  Steve Zappe
11:20  Governor’s Task Force Update  Anne deLain W. Clark
11:30  Break
11:45  WIPP’s June 28, 2002 Class 2 permit modification package - A roadmap to improving waste characterization and disposal efficiencies  Jody Plum, DEO
12:15  Status of WIPP Waste Disposal Ramp up to 28 shipments/wk  Casey Gadbury, DOE
12:30  Lunch
2:00  Update on Transportation to WIPP of LANL High Wattage Waste  Jennifer Biedsheid, WTS
2:30  Latest occupational radiation doses received by truck drivers, waste handlers, and radiation technicians  Casey Gadbury, DOE
3:00  RH TRU inventory  Casey Gadbury, DOE
Schedule for RH TRU receipt at WIPP
Check out of RH Systems (training of operators to operate, use, repair and maintain cranes/robot arms, etc.)
Status of RH TRU licensing/regulatory/approval documents
Impact of recertification on RH TRU regulatory process
3:30  Panel Closure Modification  Jody Plum, DOE
4:00  Regulatory Science Institute Workshops and Meetings - A New Process to Improve Stakeholder Understanding of the WIPP and its Regulatory Envelope  Susan McMichael
RSI Carlsbad
4:30  Closing remarks and Adjourn
EE

Handout - overview of reviews, upcoming activities (review RT mod, panel closure)

Matthew
Silva

MED
Handel

EMNRD

What staff left - who?
Major uproar over inspection of all shipment by citizen; thinks trucks may be running drugs
Deborah asked about safeguard limitation exemption that eliminates requirements for guards
Sept 28 WIPPIRAK in Eddy County
Test crew left on Aug 20 indefinitely postponed
await trip submission of CUSA report = oct/nov

Lunch

Roger Nelsen
Putting together a performance plan, will be on CBF0 web later today

Judy will be in ABQ on Friday, we

Bob Kolman
Permit and requests recently submitted on June 28

WTS
Handout - listed in order of importance
Electronic Data Agent - e-data will be optional?
Not sure who all wants this besides RFE75 + CCP?
Additional waste containers - won't use RTR on new containers because newly generated. Will seek appropriate DAC for containers once approved. Regarding “transfer contents to another container” DOE believes all circumstances covered by implementing Contingency plan.
Visual verification - newly generated, allows substituting RTR for VE
HFPAKT - optimize shipping weights
Control Charting - clarifies permit, deals with mobility
to control production of retrievably stored waste as it is repackaged
Classified info - identifies where record was stored, scope has been narrowed to only be for classified shapes.
Waste is not classified, but information is. Population is several 100 from FPETS, also expect some from NTS, SRS, Hanford. Q - what about VE? Repackaged doesn't require videotaping

U/34 waste code - HF aid. Make sure it isn't corrosive - affects ~100 containers O(WTEC). May also include some waste @ SRS, maybe one other facility

RIT inventory - Class 3 submitted June 28
1,800 m³ currently identified @ 13 sites (based on final disposal volume). Break down inventory by packaging requirements & opportunity for characterization, inventory based on date cell issued in past several months, included in most requests. Giving M&ED 2 years expected before approval

RIT Dry Run scheduled to begin 8/15/02. Ops Readiness Review scheduled to be completed 2004/4th Qtr.
Will submit to EPA Aug 02, before blackout period (Dec 1, 02)

Casey Cobbing, John van de Kraats moving to NTS. Casey now also CBFO acting on transportation
Waste Ops Mgr. Ramp up to 28 shipments/pck from 1/2/02 to present
# of TEPs from 58 in 3/02 to 62 in 6/02. 37 drivers between CAST & TST. 18 tractors, 37 trailers
WIPP needs to use 3 trucks + 1 U6 transporter 7 days/week to maintain 28 shipments/week (at 2 TPS)
1 shift 6AM - 4PM 7 days, using 2 crews. Avg resident time is 1-1/2 days storage in Parkin area + in CT Bay. Usually don't receive on Monday, make it up during rest of week.

Worker dose rate - Handart
Comments that operational dose rates is highest for "other" categories (security, maintenance, for guides, etc.)
Favor our Ramona/Deerco station (trucks spending the night), possibility of establishing monitoring station there.
Jennifer Bedsted "Quick to WIPP" - High battery waste from LANS.

Question about basis for determining risk - what was evaluation (SAR, etc.). Concern over permanent storage building. Also some protested.

Katherine blew up a detailed meeting

Susan McMichael - Improved stakeholder workshop
RSI
Recognize there are shortcomings to post meetings, looking for feedback, went to facilitate public involvement.
(1) Eliminated 3 categories of stakeholders
(2) Registration is voluntary
(3) More informal facilitation, based upon facilitator
(4) Issue general report of meeting w/ transcript & summary - verbatim
CCNS objects to reports. CARD believes process should be dumped, go back to informal meetings. Can't be fixed.
Action Items

1. EEC review double vs single containment
2. RFETS exemption on safeguard termination limits
3. Stop stopping @ Romeroville
4. Raton DOE - data from MINED detector
5. Copies of CVSA report
6. DOE show TPUs clean on return
7. Inspection by other states on return to verify empty
8. TSMT Drivers - why quit?
9. Schedule for replacement of tractor/trailers
10. Maintain schedule on waste hauler charged activity
11. Why drivers have lower dose
12. Rother Text - TLDS vs Newvet
13. Fed Gov't sample Las Vegas water monthly
14. Basis for LANC decision @ Towip
WIPP Quarterly Review
July 23, 2002

Activities Update for NMED's
RCRA Permits Program

1. Ongoing Permitting Process

- Earlier outstanding Class 1 modifications
  - Issued Administrative Completeness letters on February 25 and July 1, 2002, clearing entire backlog of Class 1 modifications including Class 1 changes received May 31, 2002
  - Granted time extension to implement February 25, 2002 revisions until June 1, 2002 on May 15, 2002

- Drum Age Criteria (DAC) modification request
  - Issued draft permit on May 13, 2002
  - Public comment period ended June 27, 2002
  - Received 9 comments, most asked for public hearing
  - Received request from citizen groups on July 5, 2002 to postpone DAC public hearing
  - Secretary Maggiore issued response on July 8, 2002 denying the request for delay
  - Deadline to submit Entry of Appearance or Notice of Intent to Present Technical Testimony is July 26, 2002
  - Public hearing still scheduled for August 26, 2002

- Centralized Waste Confirmation Facility (CCF) Class 3 modification request
  - Issued Notice of Deficiency (NOD) on June 19, 2002
  - NOD identified major issues that must be addressed before NMED can proceed
  - Permittees requested extension to 30-day response requirement on July 11, 2002
  - NMED granted extension on July 22, 2002 until January 15, 2003

- Underground Booster Fans Class 1* modification request
  - Received June 11, 2002, requesting Director approval
  - Received comments from SRIC, NMAGO, and Nuclear Watch
  - Permittees withdrew request on July 11, 2002, expressed intent to resubmit as a Class 2 modification
  - NMED provided comments on booster fan modification on July 15, 2002

- Remote-Handled TRU Waste Class 3 modification request
  - Permittees requested an extended public comment period on June 21, 2002
  - NMED granted the request on June 25, 2002
  - Received actual permit modification request on June 28, 2002
  - Public comment period ends on October 31, 2002
• Received other numerous modifications on June 28, 2002
  - Electronic data management (determined to be a Class 3 modification on July 22, 2002)
    - Control charting
    - Radiography in lieu of visual verification
    - HalfPACT
    - New Hazardous Waste Number (U134)
    - Classified information
    - Additional waste container types (determined to be a Class 2 modification on July 22, 2002)
    - Comment period ends September 3, 2002

• WIPP Facility Work Plan, Sampling and Analysis Plan
  - Received Quarterly Progress Report for SWMU investigations on May 13, 2002
  - Received Annual Modification of WIPP Facility Work Plan on February 25, 2002
  - NMED submitted comment letter on split sampling results on June 17, 2002
  - Also preparing general letter regarding approval of Facility Work Plan

• Groundwater Detection Monitoring Program
  - NMED issued comments on the groundwater level monitoring program on May 13, 2002
  - Received response to water level comments on June 14, 2002

2. RCRA-related Audits

• Previously rejected audit reports, October 11, 2001 (RFETS and Hanford recertifications)
  - NMED issued clarification letter identifying what information needs to be submitted on February 19, 2002
  - Received objective evidence for rejected RFETS report on March 15, 2002
  - Received objective evidence for rejected Hanford report on March 18, 2002
  - Both currently under review

• LANL Packaging – Sealed Sources, May 14 - 18, 2001
  - Received final audit report February 6, 2002
  - Deferred approval on June 18, 2002 until report includes AK information for newly generated waste

• INEEL Recertification, July 30 - August 3, 2001
  - Received final audit report March 5, 2002
  - Received revised audit report March 6, 2002
  - Currently under review

• LANL Recertification, October 22 - 26, 2001
  - Received final audit report April 26, 2002
  - Currently under review

• SRS Recertification, December 10 - 14, 2001
  - Received final audit report May 2, 2002
  - Currently under review
• RFETS Recertification, February 4 - 8, 2002
  - Received initial final audit report April 22, 2002
  - Received revised final audit report May 10, 2002
  - Currently under review

• SRS HSG Compositing, March 13 - 14, 2002
  - Received final audit report April 3, 2002
  - Currently under review

• RFETS New VE, Mobile RTR, June 4-7, 2002
  - Received final audit report July 5, 2002
  - Currently under review

• Hanford Recertification, June 24-28, 2002
  - Awaiting final audit report

• Upcoming audits (“official” dates, some may have changed or been postponed)
  - INEEL Recertification, August 5-9, 2002
  - LANL Recertification and new HSG system, August 26-30, 2002
  - ANL-E/CCP, September 9-13, 2002
  - NTS/CCP, September 23-27, 2002
  - RFETS Bldg 440 VE, PCB analysis, etc., October 1-4, 2002
  - SRS Recertification, October 22-25, 2002
  - Advanced Mixed Waste Treatment Facility (INEEL), November 12-15, 2002
  - RFETS Polymerized organic sampling, etc., November 19-23, 2002
  - RFETS Recertification, March 3-7, 2003

3. Other activities

• NMED clearance status
  - Steve Holmes had his “L” clearance reinstated June 19, 2002
  - Both Holmes and Steve Zappe are currently being investigated for “Q” clearances
  - CBFO clarified conditions which NMED must meet to obtain clearances on June 13, 2002

• New Mexico Court of Appeals ruling on citizen lawsuit regarding Permit Condition IV.B.2.b on June 5, 2002
  - Ruled that the court had jurisdiction in the case
  - Affirmed the Secretary’s determination that the change was appropriately processed as a Class 1 modification

• Project organization
  - Recently hired Kevin Krause to work on audits and permit compliance issues
  - WIPP project now has five staff members
  - Currently adding three new positions to handle workload

• New WIPP Technical Contractor
  - Reviewed proposals to provide technical assistance with permit modifications and audits
  - Awarded contract to Trinity Engineering, using many of the same people from the earlier A.T. Kearney and TechLaw Inc. contracts
Subject: Change in WIPP Presentations for 79th Periodic C&C Agreement Meeting - 7/23/02

Date: Tue, 23 Jul 2002 07:21:13 -0600
From: "Nelson, Roger - DOE" <Roger.Nelson@wipp.ws>
To: "DeLain Clark, Ann" <aclark@state.nm.us>
CC: "Steve Zappe" <Steve_Zappe@nmenv.state.nm.us>, "Silva, Matthew - EEG" <msilva@eeg.org>,"Kehrman, Bob" <Bob.Kehrman@wipp.ws>

Due to mechanical failure, the only Mesa Flight from Carlsbad was cancelled this morning (~15 minutes ago). CBFO apologizes for any inconvenience this causes. However, there will be WIPP participation at the meeting. Casey Gadbury (CBFO Waste Handling Team Leader and Jody Plum, Regulatory Compliance Specialist) will represent CBFO at the meeting. Bob Kehrman and I will be available by phone during the meeting to answer questions as well.

Casey and Jody are in transit, and as I write this, are unaware that they are being called upon to step up their contribution. We will continue to attempt contact throughout the remainder of the early morning.

The following agenda shows suggested revisions based on the changes to CBFO participation:

10:45 WIPP's June 28, 2002 Class 2 permit modification package - A roadmap to improving waste characterization and disposal efficiencies. Bob Kehrman, WTS was to have given this presentation. Now: Jody Plum.

11:15 Status of WIPP Waste Disposal Ramp up to 28 shipments/wk. Casey Gadbury will give this presentation.

1:00 Update on Transportation to WIPP of LANL High Wattage Waste. Murthy Devrokanda, WTS was originally going to present this subject, but Jennifer Biedsheid will now present it.

1:30 Latest occupational radiation doses received by truck drivers, waste handlers, and radiation technicians. Casey Gadbury, DOE will give this presentation.

2:00 RH TRU inventory. Willie Most, WTS was to give this presentation. Casey Gadbury will now present it.

2:30 Panel Closure Modification. Daryl Mercer, DOE was originally assigned to make this presentation. Now, Jody Plum will present it.

3:00 Regulatory Science Institute Workshops and Meetings - A New Process to Improve Stakeholder Understanding of the WIPP and its Regulatory Envelope. Phil Gregory, Director RSI Carlsbad, was originally asked to make this presentation. Because of personnel changes, Susan McMichael will lead this discussion.
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LXXIX QUARTERLY MEETING

U.S. Department of Energy
Environmental Evaluation Group
N.M. Energy, Minerals, and Natural Resources
N.M. Environment Department
N.M. Attorney General

Environmental Evaluation Group
http://www.eeg.org

July 23, 2002
Santa Fe
Reviews

☑ Provided comments on the Class 3 Drum Age Criteria Modification

☑ Reviewed and are currently composing comments on the Proposed Annual Update of CH TRU SAR

☑ Observed the Salado Flow Peer Review process and reviewed the Peer Review Panel Report

☑ Reviewed the Proposed Modification to remove the underground booster fan

☑ Reviewed and are currently composing comments on proposed changes affecting the double containment of Pu shipments (NRC 10 CFR 71)
Reviews

☑ Submitted comments to NRC concerning the request by WTS for authorization to ship high wattage CH TRU from Los Alamos to WIPP

☑ Provided comments on the draft revision to the CBFO's Quality Assurance Program Documents

☑ Reviewed Site Users Guide for Organizations

☑ Reviewed Motor Carrier Safety Analysis, Facts & Evaluations Regarding CSVA Level VI Inspections
Anticipated Activities

☑ RH TRU Review- Request for a Class 3 Permit Modification

☑ Presentation to Western Governors Association

☑ Forthcoming EEG Reports:
  ➢ RH TRU Waste
  ➢ Recertification Issues

☑ Review forthcoming Panel Closure proposed modifications
Meetings

- June 4-5: CBFO/EPA Working Meeting; Washington, DC (L. Allen; M. Silva)
- June 5: RSI RH-TRU Information Workshop; Santa Fe, NM (J. Channell)
- June 6: RSI Information Interactive Workshop on Proposed WIPP Permit Modifications; Carlsbad, NM. (S. Ballard)
- June 18: Joint Effluent Monitoring Informational Exchange group [formerly the AMIT group]; Carlsbad, N.M (T. Klein)
- June 27: RSI Workshop on High Heat Source Waste (G. Anastas)
Audits

- May 14-16: EPA audit of CBFO QA to verify completion of corrective actions. (B. Walker)

- May 20-21: CBFO audit of WTS QA. (B. Walker)

- June 3-7: CBFO audit of RFETS, CBFO A-02-19. (B. Walker; S. Webb)

- June 24-28: EPA audit of CBFO (T. Klein)

- June 24-27: CBFO audit of Hanford Recertification of the TRU Waste Characterization, Certification and Transportation Programs (S. Webb)

- July 9-11: CBFO audit of WTS QA Program Activities. (B. Walker)
EEG Presentations/Publications


- May 31: Radioactive Waste Consultation Task Force; Santa Fe, NM. "WIPP Update & Briefing" by Matthew Silva


- Jun 13: National Conference of State Legislatures-Legislative Roundtable on Waste Disposition Issues; Santa Fe, NM. "WIPP Update" by Matthew Silva
Read/Download:

☑ EEG's Sample Results for the Year 2001: Air Monitoring (Prepublication)

☑ EEG Reports on Transportation Issues


➤ EEG 46: Risk analysis of the transport of contact handled transuranic (CH-TRU) wastes to WIPP along selected highway routes in New Mexico using RADTRAN IV, by Anthony F. Gallegos and James K. Channell. August 1990.
NM WIPP SAFE
TRANSPORTATION PROGRAM
State of New Mexico
Radioactive Waste Consultation Task Force
Update

79th WIPP Quarterly Meeting
July 23, 2002

Anne del.ain W. Clark
NM Energy, Minerals and Natural Resources Department
Santa Fe, New Mexico 87505
(505) 476-3224

Task Force Accomplishments

- Coordinator attended/participated in the following meetings/presentations connected with WIPP:
  - National Conference of State Legislatures (NCSL)
  - 2 WGA Conference calls or WGA letter commenting on proposed NRC double containment rule change
  - DOE WIPP Workshop on LANL high wattage waste
  - DOE MERRITT Train the Trainer training hosted by NM DPS
  - Meeting with WGA & EEC staff to discuss RH waste, rail transport, & NRC's proposed rule change
  - Meeting with CBFO & WGA staff in Carlsbad
- Coordinator facilitated:
  - 3 NM WIPP Working Group meetings
  - Co-Chair of the WGA March meeting in Phoenix
- Coordinator presented on the NM WIPP Safe Transportation Program to the NCSL
- Held Task Force Meeting on May 21, 2002
Department of Health Accomplishments

- Provided 1 “EMS Operations for Hazardous Materials” course.
- Provided 4 “Hospital Response to Hazardous Materials” courses which included hands on training with Ludlum Geiger counters.
- Received new equipment to be distributed (with appropriate training) to medical first responders and hazmat hospital teams along WIPP route:
  - 50 Powered Air Purifying Respirators (PAPR)
  - 15 decontamination shower packages
- Discussed with the EMS Academy making a 1 hour presentation on Hazmat/WIPP response a required part of the curriculum for EMT-B training.

Dept of Public Safety Accomplishments

- 13 EROs attended Modular Emergency Response Radiological Transportation Training (MERRTT) hosted by DPS
- 5 EROs attended Incident Commander Course at TTCI
- 16 EROs attended Highway Emergency Response Specialist Course at TTCI
- 5 EROs attended Tank Car Specialist Course at TTCI
**DPS MTD Accomplishments**

En-route inspections (radiological & mechanical) conducted at Raton Port of Entry and Loving Inspection site for all WIPP shipments entering New Mexico during the quarter.

- INEEL – 113
- RFETS – 181
- SRS – 1

Violations of Federal Motor Carrier Safety Regulations

- 26 WIPP shipments
- 32 violations
- 12 vehicles placed Out-of-Service until defects/violations detected were repaired

**DPS MTD Accomplishments cont.**

Hosted CVSA Basic Level VI Inspection Training at the Pecos River Village Convention Center:

- April 2 – 5, 2002
- May 28 – 31, 2002
- June 27 – 29, 2002

- MTD personnel attended and MTD Hazardous Materials Training Team Members were instructors

- MTD Hazardous Materials Training Team members attended DOE MERRIT “Train-the-Trainer” Course hosted by DPS.

- MTD personnel provided CVSA Level I Practical “On-Hands” Training to WIPP shipment drivers at San Jon POE.
**DPS MTD Accomplishments cont.**

- MTD HM/WIPP Coordinator responded to accident involving a WIPP shipment and a deer on the evening of 6/11/02 on US 285 at MM 235 southbound. Vehicle sustained damage to left front bumper, fender and headlight assembly. Upon arrival at the scene, it was discovered the headlight had been secured in place with tape and plastic wire ties. Vehicle was in operable condition and allowed to proceed after roadside inspection at 12:15 am, 6/12/02.

- MTD held annual Inspector Competition at NM State Fair grounds June 13 - 15. MTD Hazardous Materials Training Team members conducted and judged hazardous materials portion of competition (both bulk & non-bulk). Patrolman Greg Kerr, certified CVSA Level VI Inspector, won the competition.

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**DPS OEM Accomplishments**

- Scott Field started work as the WIPP Administrative Coordinator
- WIPP Administrative Assistant hired, Stacey Day
- Trained in MERRTT
- Assisted in planning Eddy County WIPPTRAX
- WIPP Tour and met with WIPP Emergency Response Staff
- Conference call meeting with WGA Security Committee
- Observed WIPP site emergency exercise
- Assistant instructor for MERRTT Training in Las Vegas, NM
  - Ms. Day attended as a student
- Meeting with DOE OTS
- LANL tabletop exercise involving release of radiation
- Mr. Field and Ms. Day attended TRANSCOM training
- Eddy County WIPPTRAX tabletop
- WIPP Tour for Department of Public Safety Personnel
- Conducted equipment inventory to tracked by database
State Fire Marshal’s Accomplishments

- Executed and funded Joint Powers Agreements with local governments along the WPP routes:
  - Broad spectrum of responses from no action (Torrance and San Miguel Counties) to the best, Cibola County
  - Cibola County developed a training program, purchased needed response equipment, conducted several exercises and produced ongoing plan of action.
  - Other local governments have used funding to provide for training, equipment purchases and payment of overtime for hazardous materials training.

- Posted and accepted applications for the WIPP Coordinator Position within State Fire Marshal’s Office. Should begin interviewing in next week or so.

NMED

Radiation Control Bureau Accomplishments

- Raton POE radiation detection monitoring system operating with real time transportation data being collected since May 2002.

- Radiation Control Bureau staff finalizing final quality control/assurance procedures on system

- Standard Operating Procedures for POE personnel developed in draft form

- Final test performance criteria involving remote testing of system’s performance standards to be performed in two weeks by Eberline Company (makers of system)
NMED
Radiation Control Bureau Accomplishments

- NMED undergoing major program directive to consolidate all emergency response protocols under jurisdiction of single coordinator. Radiation Control Bureau and WIPP coordinator have developed draft emergency response plans and procedures, mandating roles/responsibilities related to Class 7 emergency response activities.

- Radiation Control Bureau upgraded their radiation instrumentation inventories to include two multi-channel analyzers:
  - Berkeley Nucleonic SAM-615 for radionuclide identification of gamma emitters
  - SAIC AP-2 alpha swipe monitor for counting swipes for alpha contamination and on-site identification of alpha emitter (including transuranic elements)
  - two instrument packages greatly enhance response capabilities allowing for on-site determination of Class 7 materials.

Problems/Unresolved Issues

- 2-hour notifications to the Raton POE are not happening on a regular basis
- Next formal Radioactive Waste Consultation Task Force Meeting indefinitely postponed until DOE provides an expected completion date for CVSA Inspection Report and Analysis
- Effectiveness of State Fire Marshal's Community Emergency Response Preparedness JPA program is uneven and may not be recommended for continuation
What's in the Future

- PAPRs & decontamination shower packages will be distributed & EMS & hospital staff trained in their use over the next quarter
- Meet with Torrence County on WIPP medical preparedness
- DTPA Inventory/Usage report

Thank You

State of New Mexico:
www.emnrd.state.nm.us/wipp
WIPP Joint Powers Agreements
Between the Public Regulation Commission / State Fire Marshal's Office
On behalf of the WIPP Transportation Safety Program
And local governments

<table>
<thead>
<tr>
<th>Local Governing Body</th>
<th>Amount</th>
<th>Purpose</th>
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<tbody>
<tr>
<td>City of Artesia</td>
<td>7000.00</td>
<td>Support regional response haz mat team</td>
</tr>
<tr>
<td>City of Albuquerque</td>
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<td>Support regional response haz mat team</td>
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<tr>
<td>City of Carlsbad</td>
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<td>Support regional response haz mat team</td>
</tr>
<tr>
<td>City of Gallup</td>
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</tr>
<tr>
<td>City of Hobbs</td>
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</tr>
<tr>
<td>City of Raton</td>
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</tr>
<tr>
<td>City of Roswell</td>
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<tr>
<td>Santa Fe County</td>
<td>15000.00</td>
<td>Support first responder training</td>
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<tr>
<td><strong>Total amount</strong></td>
<td><strong>133,000.00</strong></td>
<td></td>
</tr>
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</table>

A Joint Powers Agreement was offered to Bernalillo County and was declined by Bernalillo County. A request was received from the City of Espanola and was declined by the WIPP Working Group.
Recently Submitted WIPP Permit Modification Requests

July 23, 2002

Energy, Minerals, and Natural Resources Department
Santa Fe, New Mexico

Recently Submitted Requests

- Data Management
- Containers
- Visual Verification
- HalfPACT
- Control Charting
- Classified Information
- U134 Code
Stakeholder Workshops (cont.)

- June 4, 2002
  - HalfPACT
  - Classified Information
  - Control Charting
  - Data Management
  - Visual Verification
  - U134
  - Waste Containers
Benefits

- Cuts data approval time significantly
- Allows CBFO and NMED remote access to program-related records
- Reduces the amount of paper that must be managed

Changes Incorporated Following Stakeholder Workshops

- Modified text to reflect February 2002 permit reissuance
- Added crosswalk between previous permit text and proposed permit text
- Verified that all text changes are explained
- Added “EPA Electronic Reporting Initiative” information as an appendix
- Added reference to the standard for electronic data storage
Proposed Change

- Add three containers
  - Direct-loaded 85-gallon drums
  - Direct-loaded Ten Drum Overpacks (TDOPs)
  - 100-gallon drums
- Addition of these waste containers will facilitate generator sites' shipment of larger debris items

Benefits

- Facilitates the shipment of larger items
- Facilitates super-compacted waste from the Advanced Mixed Waste Treatment Facility
- Aligns disposal containers with shipping containers
Proposed Change

• Allow generator sites the flexibility to use radiography for newly generated waste, instead of the visual examination technique

Benefits

• Allows sites to manage waste more efficiently
• Minimizes number of trained VE operators
Proposed Change

- Add the HalfPACT to the list of approved NRC-certified packages

Benefits

- Allows shipment weight to be optimized
Proposed Change

- Allow generator sites to use retrievably stored waste characterization sampling process for repackaged homogeneous solids

Benefit

- Clarifies permit language
- Allows sites to demonstrate that repackaged waste is not a candidate for control charting
Proposed Changes

• Radiography tape review and storage
• Disposition of classified information
• Waste characterization information retrievability
• Audit records and access to classified information

Benefits

• Sites do not have to open containers to sanitize waste
• Sites avoid doses during sanitization
• Sites do not have to build or upgrade facilities for sanitization
Proposed Change

• Add U134 to the WIPP permit
• No additional or different waste management practices at WIPP will be required
• The waste will meet the WIPP Waste Acceptance Criteria
  • Characterized in accordance with the WIPP Waste Analysis Plan

79th WIPP Quarterly Meeting

Proposed Change (cont.)

• Waste will be certified through acceptable knowledge or testing and/or analysis that it no longer exhibits the characteristic of corrosivity
  • This is confirmed by assuring that no liquid waste is present through the use of visual examination or radiography on 100% of the containers

79th WIPP Quarterly Meeting
Changes Incorporated Following Stakeholder Workshops

- There were no changes suggested at the stakeholder meetings with regard to this modification

<table>
<thead>
<tr>
<th></th>
<th>Assist in WIPP Site Compliance</th>
<th>Make Permit Current With Operations</th>
<th>Make Operations More Efficient</th>
<th>Reduce Worker Shoe Rate</th>
<th>Incorporate Technology or Equipment</th>
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<td>Data Management</td>
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<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
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<td></td>
<td></td>
<td>X</td>
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<tr>
<td>Use of Radiography for Newly Generated Waste</td>
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<td>X</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Control Charting</td>
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<td>X</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Addition of MatPACTs</td>
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<td>X</td>
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<tr>
<td>Add U13M</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
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</table>
RH-TRU Waste Inventory

- Total of 1,800 m$^3$ RH-TRU waste (vs. 7,080 m$^3$ RH disposal capacity)
- RH-TRU waste managed at 13 generator/storage sites
- Other RH-TRU wastes may come to WIPP
  - West Valley
  - Sodium Bearing waste from INEEL
RH-TRU Inventory By Packaging

- Packaged: 2%
- To Be Packaged: 42%
- To Be Repackaged: 5%
- To Be Generated: 55%

79th WIPP Quarterly Meeting

RH-TRU Inventory By Waste Form

- Debris: 30%
- Homogeneous: 70%

79th WIPP Quarterly Meeting
RH-TRU Inventory Mixed vs. Non-Mixed

70% Mixed

Non-Mixed

RH-TRU Inventory by Location of Curies (%)

5% Hanford

23% INEEL

62% LANL

5% ORNL

6% BCL
### Schedule for RH-TRU Receipt at WIPP

- Final RH-TRU Permit Modification Request submitted to the NMED 6/28/02
- Final submittal of RH-TRU EPA Notice of Planned Change 8/02
- Schedule shows a two-year NMED approval time frame
- EPA-ORIA approval expected by 7/03

### Schedule for RH-TRU Receipt at WIPP

- Site program development and certification (requirements may change with final authorization)
  - Certification plans
  - QAPjPs
  - Procedures
  - Surveillance
- RH-TRU waste receipt 3/05
Checkout of RH Systems

- RH performance dry run
- Scheduled for 8/19/02
- Operational demonstration of both the 72B and 10-160B RH waste handling systems

Checkout of RH Systems

- Begins at the trailer in the RH Bay through emplacement in the underground RH boreholes
- Exercises operational procedures
- Exercises maintenance procedures as necessary
- Dry run uses weight-loaded containers to simulate real conditions
Checkout of RH Systems

- In addition to the RH TRU Performance Dry Run there will be an Operational Readiness Review (ORR) to verify that formal processes are in place for management of RH TRU waste
- ORR will be completed prior to going hot.
- ORR scheduled completion 4th quarter 2004

Status of RH-TRU Agency Approval Documents

- RH-TRU Permit Modification Request
  - Submitted to NMED June 28, 2002
  - 120-day public comment period, RH public meetings scheduled Oct 1st and Oct 3rd, 2002
- RH-TRU EPA Notice of Planned Change
  - Undergoing final review/comment/resolution cycle
  - Formal submittal for agency review and approval anticipated August 2002
Impact of Recertification on RH-TRU Regulatory Process

- DOE intends to submit the RH-TRU EPA Notice of Planned Change before the blackout period to avoid conflicts with recertification activities
- EPA believes they can approve WIPP's RH waste analysis notice prior to commencement of recertification activities

Transportation Requirements

- Department of Transportation and Nuclear Regulatory Commission requirements were not addressed in the RH agency approval documents
- These requirements are addressed in the RH-TRU Waste Acceptance Criteria
Status of WIPP CH TRU Waste Disposal Ramp Up to 28 Shipments/Week

Casey Gadbury
DOE Carlsbad Field Office

79th Quarterly EEG Meeting
July 23, 2002
Presentation Outline

- 28 Shipments/week Ramp Up Period
- Status of Transportation Resources
- Status of WIPP Site Resources
28 Shipments/week Ramp Up Period

• In January to March 2002, WIPP achieved and maintained about 17 shipments per week rate

• From April 2002 to present, WIPP ramped up to the 28 shipment per week rate

• See Monthly Shipments Graph
WIPP Monthly Shipments Summary

Number of Shipments

0 10 20 30 40 50 60 70 80 90 100 110 120

- SRS
- Hanford
- RFETS
- INEEL
- LANL

M-99 J-99 S-99 D-99 M-00 J-00 S-00 D-00 M-01 J-01 S-01 D-01 M-02 J-02

Ships Recd. x's

7/8/02
Status of Transportation Resources

• TRUPACT-IIs
  – March – 56
  – April – 58
  – May – 59
  – June – 62

• Truck Drivers (March – June 2002)
  – CAST – 17
  – TSMT – 20
Status of Transportation Resources (Cont.)

- Tractors (March – June 2002)
  - CAST – 8
  - TSMT – 10

- Trailers (March – June 2002)
  - CAST – 17
  - TSMT – 20
Status of WIPP Site Resources

• To process 28 shipments per week, the WIPP site needs the following personnel to staff 3 dock positions and 1 U/G Transporter 7 days per week
<table>
<thead>
<tr>
<th>EACH CREW</th>
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<tbody>
<tr>
<td>1 WHE</td>
</tr>
<tr>
<td>5 WHTs (docks - 3 positions)</td>
</tr>
<tr>
<td>2 Floor, Yard and Emplacement Techs (surface)</td>
</tr>
<tr>
<td>2 Floor, Yard and Emplacement Techs (U/G)</td>
</tr>
<tr>
<td>2 Backfill Techs (MgO)</td>
</tr>
<tr>
<td>3 RCTs (docks - 3 positions)</td>
</tr>
<tr>
<td>1 RCT (U/G)</td>
</tr>
<tr>
<td>1 Survey/Air Monitoring Tech (rover)</td>
</tr>
<tr>
<td>1 Air Monitoring Tech (effluent monitoring, sampling, instrument cals)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TOTAL - 2 CREWS</th>
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</thead>
<tbody>
<tr>
<td>2 WHEs</td>
</tr>
<tr>
<td>10 WHTs</td>
</tr>
<tr>
<td>4 F/Y/E Techs (surface)</td>
</tr>
<tr>
<td>4 F/Y/E Techs (U/G)</td>
</tr>
<tr>
<td>4 Backfill Techs (MgO)</td>
</tr>
<tr>
<td>6 RCTs (docks)</td>
</tr>
<tr>
<td>2 RCTs (U/G)</td>
</tr>
<tr>
<td>2 Survey/Air Monitoring Techs (rover)</td>
</tr>
<tr>
<td>2 Air Monitoring Techs</td>
</tr>
</tbody>
</table>
Status of WIPP Site Resources (Cont.)

- Waste Handling Equipment
  - (2) 13 Ton Forklifts
  - (2) TRUDOCKs with 4 postions
  - (2) 6 Ton Cranes (one over each dock)
  - (8) Facility Pallets
  - (1) Conveyance Loading Car
  - (4) ACGLFs
  - (4) 6 Ton Forklifts with BRUDI/LORON
LATEST WIPP CH TRU DOSE RATES AND WORKER DOSES

Casey Gadbury, NRRPT
DOE Carlsbad Field Office

79th Quarterly EEG Meeting
July 23, 2002
PRESENTATION OUTLINE

• Review of TRU Waste Dosimetry Requirements
• WIPP CH TRU Dose Rates & Doses
• WIPP Dosimetry Data – 1999 to 2002 CH TRU Operations
• Histograms of Payload Dose Rates
REVIEW OF TRU WASTE DOSIMETRY REQUIREMENTS

• 10 CFR 835, *Occupational Radiation Protection*
  – All radiological activities must maintain radiation dose levels *ALARA*
  – Occupational dose limit --- 5 rem/y
    • DOE administrative dose limit --- 2 rem/y
    • facility/site admin. dose limit --- 1 rem/y at WIPP

• TRU Waste Container Surface Dose Rates
  – CH TRU --- < 200 mrem/h
  – RH TRU --- Between 200 mrem/h and 1,000 rem/h

• Transportation Requirements per 10 CFR 71
  – Applicable to CH and RH TRU shipments in DOT Type B transportation casks
    • cask surface --- < 200 mrem/h
    • 2 m (6.6 ft) from cask surface --- < 10 mrem/h
    • any occupied location --- < 2 mrem/h
WIPP CH TRU DOSE RATES & DOSES

- Actual Dose Rates are Much Less than Regulatory Limits (200 mrem/h on cask surface, 10 mrem/h at 2 m, 2 mrem/h at driver location)

- Doses to Truck Drivers Depend on Dose Rates and Transportation Duration

- CH TRU Truck Driver Dose --- Total dose to truck drivers from WIPP opening to June 20, 2002 is 342 mrem for 965 shipments → 0.35 mrem/shipment
WIPP CH TRU WASTE DOSE RATES

- TRUPACT and Payload Dose Rate Information (WWIS)
  - Shipment dose rates
    - gamma + neutron dose rates on TRUPACT-II
    - dose rates on TRUPACT-II surface
    - dose rates at 1 m and 2 m from TRUPACT-II surface
  - Payload surface dose rates
    - Gamma + neutron dose rates on each container in the payload
WIPP CH TRU WASTE DOSE RATES

- Container Dose Rates (RCT Surveys)
  - photons (gamma & X-ray, major component) and beta (negligible)
  - neutron (minor component, < 10%)
  - surface & 30 cm dose rates
  - Used by RCT to apply appropriate radiological controls and to check against WWIS container dose rate information
DOSES FROM WIPP CH TRU WASTE

- **Worker Dose Information**
  - Personnel (including truck drivers) dose recorded at the WIPP facility by a DOELAP-accredited Harshaw TLD system capable of measuring beta, gamma, X-ray and neutron doses
  - LLD per readout: 10 mrem deep dose, 35 mrem shallow dose
WIPP CH TRU Shipments and Average Dose Rates, 3/1999 – 6/2002 (WWIS Data)

<table>
<thead>
<tr>
<th></th>
<th>1999</th>
<th>2000</th>
<th>2001</th>
<th>2002</th>
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<tbody>
<tr>
<td># TRUPACT-II's /</td>
<td>105 / 44</td>
<td>224 / 84</td>
<td>807 / 362</td>
<td>957 / 475</td>
</tr>
<tr>
<td># Shipments</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>TRUPACT Surface Dose</td>
<td></td>
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<tr>
<td>Rate (mrem/h) - Average</td>
<td>0.34</td>
<td>0.19</td>
<td>0.2</td>
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</tr>
<tr>
<td>- Highest</td>
<td>2.0</td>
<td>1.0</td>
<td>1.0</td>
<td>1.1</td>
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<tr>
<td>Container Surface Dose Rate (mrem/h) - Average</td>
<td>0.2</td>
<td>0.9</td>
<td>2.5</td>
<td>3.5</td>
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<tr>
<td>- Highest</td>
<td>6.0</td>
<td>46</td>
<td>162</td>
<td>153</td>
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## WIPP CH TRU Operational Dose

<table>
<thead>
<tr>
<th></th>
<th>1999 (Dose / # of Workers with Positive Dose)</th>
<th>2000</th>
<th>2001</th>
<th>2002</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Handling</td>
<td>52 mrem / 4</td>
<td>45 mrem / 2</td>
<td>211 mrem / 9</td>
<td>519 mrem / 19</td>
</tr>
<tr>
<td>Rad Con</td>
<td>14 mrem / 1</td>
<td>11 mrem / 1</td>
<td>247 mrem / 9</td>
<td>602 mrem / 25</td>
</tr>
<tr>
<td>Truck Drivers</td>
<td>96 mrem / 3 (highest 39 mrem)</td>
<td>55 mrem / 4</td>
<td>173 mrem / 12</td>
<td>29 mrem / 2</td>
</tr>
<tr>
<td>Others</td>
<td>169 mrem / 12</td>
<td>21 mrem / 1</td>
<td>472 mrem / 29</td>
<td>346 mrem / 27</td>
</tr>
<tr>
<td>Total</td>
<td>0.331 person-rem / 20</td>
<td>0.132 person-rem / 8</td>
<td>1.103 person-rem / 59</td>
<td>1.496 person-rem / 73</td>
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</tbody>
</table>
Histogram of Average Gamma Dose Rates from Payloads, 3/1999-6/2002
Histogram of Average Neutron Dose Rates from Payloads, 3/1999-6/2002
Update on Transportation to WIPP of LANL High-Wattage CH-TRU Waste

Murthy Devarakonda
Westinghouse TRU Solutions, LLC

79th WIPP Quarterly Meeting – Santa Fe, New Mexico
July 23, 2002

Accelerated Shipment of High-Wattage CH-TRU Waste from LANL

- Part of overall DOE-Albuquerque initiative supported by DOE-CBFO to accelerate cleanup of LANL and other New Mexico sites
- Eliminates lengthy repacking process to accommodate transportation requirements
- Developed in response to evaluation of risk associated with the plutonium stored above ground at LANL Technical Area 54 (TA-54)
Accelerated Shipment of High-Wattage CH-TRU Waste from LANL

- Evaluation concluded that risk can be reduced by shipping approximately 2,000 drums of high-wattage CH-TRU waste stored above ground at TA-54 to WIPP
  - 2,000 high-wattage CH-TRU waste drums (removing 4.5% of LANL TA-54 inventory reduces 61% of risk posed by dispersible materials)

Waste Inventory

- Waste Volume at LANL, TA-54 (910 C m³)
  - Cement/Sludge Waste: 2,000 m³ (22%)
  - Stored Below Ground: 2,400 m³ (29%)
  - Volume at Risk: Dispersible Waste Stored Above Ground: 4,300 m³ (47.5%)
  - Target 2000 Drums (4.5% of LANL Inventory)
  - 2,000 Debris Drums (61%)
  - Dispersible Homogeneous Drums (27.5%)

Translates to 4.5% of Inventory and 61% of Risk
### Steps to Accelerated Shipment – Transportation Activities

- Submitted application for Revision 19a of TRAMPAC to NRC on March 15, 2002
  - Limited to 2,000-drum population posing risk
  - Vacuum application to remove hydrogen accumulated during storage and inerting of Inner Containment Vessel as an additional margin of safety
  - Shorter shipping period to limit hydrogen accumulation during transport (5 days)

- Application for Revision 19a of TRAMPAC approved by NRC on July 5, 2002
- Controls specified in Revision 19a must be implemented by LANL and WIPP to ensure compliance
  - Training unit demonstration of Revision 19a evacuation/backfill procedure completed June 20, 2002
  - Operational procedures are being developed by LANL and WIPP
Steps to Accelerated Shipment – Characterization Activities

- LANL will characterize waste in full compliance with current WAP and CH-WAC requirements
  - WIPP Central Characterization Project (CCP) will assist LANL by performing headspace gas sampling and analysis (HSGS&A)
  - Modular units for HSGS&A and visual examination/repackaging will be re-located at Area G
  - LANL plans a permit modification request to reflect this change

Steps to Accelerated Shipment – Public Involvement Activities

- Public involvement governed by the DOE/NNSA 2002 Communications Plan for Expedited Shipment of TRU Waste from LANL to WIPP
  - Workshop conducted by Institute for Regulatory Science on June 27, 2002
  - Project updates are being provided to the Northern New Mexico Citizens Advisory Board