

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

27 JAN 2003

ENTERED



Mr. Steve Zappe, Project Leader (WIPP)
 Hazardous Waste Permits Program
 Hazardous Waste Bureau
 New Mexico Environment Department
 2909 E. Rodeo Dr, Bldg. 1
 Santa Fe, NM 87502-6303

Subject: Notification of a Class 1 Permit Modification to the Hazardous Waste Facility
 Permit for Relocation of the Fire Alarm Control System, Permit Number:
 NM4890139088-TSDF

Dear Mr. Zappe:

The purpose of this letter is to submit this notification of a Class 1 modification to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Number: NM4890139088-TSDF. The proposed changes do not comprise worker safety, human health, or the environment. The purpose of this modification is to allow the relocation of the fire alarm control system from Panel 1 prior to closure of that Panel.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

If you have any questions regarding this data transmittal, please contact Mr. Jody Plum at (505) 234-7462.

Sincerely,

Chuan F. Wu for

Dr. Inés R. Triay, Manager
 Carlsbad Field Office

S. D. Warren for

S. D. Warren, President
 Washington TRU Solutions LLC

Enclosure

cc: w/enclosure
 C. Walker, TechLaw

cc: w/o enclosure
 J. Bearzi, NMED
 J. Kieling, NMED



Class 1 Permit Modification Notification

Relocate Fire Alarms

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

WIPP HWFP #NM4890139088-TSDF

January 24, 2003

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Acronyms and Abbreviations

CMR	Central Monitoring Room
HWFP	Hazardous Waste Facility Permit
NMAC	New Mexico Administrative Code
PA	Public Address
PMN	Permit Modification Notification
TRU	Transuranic
TRUPACT	Transuranic Package Transporter
TSDf	Treatment, Storage and Disposal Facility
WIPP	Waste Isolation Pilot Plant

Overview of the Permit Modification Notification

This document contains a Class 1 Permit Modification Notification (**PMN**) to the Hazardous Waste Facility Permit (**HWFP**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF hereinafter referred to as the WIPP HWFP.

This PMN is being submitted by the U.S. Department of Energy, Carlsbad Field Office and Westinghouse TRU Solutions LLC, collectively referred to as the Permittees, in accordance with the WIPP HWFP, Condition I.B.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating 40 Code of Federal Regulations §270.42(a)). The PMN in this document is necessary to maintain compliance with the current HWFP. This change does not reduce the ability of the Permittees to provide continued protection to human health and the environment.

This PMN has been classified as a Class 1 modification under 20.4.1.900 NMAC incorporating 40 CFR §270.42 Appendix I, Item B.6.b (Contingency Plan: Replacement with functionally equivalent equipment, upgrade or **relocate emergency equipment listed**). (Emphasis added)

The requested modification to the WIPP HWFP and related supporting documents are provided in this PMN. The proposed modification to the text of the WIPP HWFP has been identified using a double underline and revision bar in the right hand margin for added information, and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by italicized text.

Attachment A

Description of the Class 1 Permit Modification Notification

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notification

No.	Affected Permit Section	Item	Category	Attachment A Page #
1	a.1. Attachment F, Table F-6 a.2. Attachment F, Figure F-5	Relocate fire alarm from Panel 1	B.6.b	A-3

Item 1

Description:

This PMN revises the WIPP HWFP, Attachment F, RCRA Contingency Plan, to reflect relocation of the fire alarm panel from Panel 1 of the underground Hazardous Waste Disposal Unit to between E-140 and E-300 in the S-2180 drift. In addition, the fire alarm hand switch was relocated from Panel 1 to E-140 just north of S-2580.

Basis:

The fire alarm panel was located in Panel 1 outside of Room 1 and the fire alarm hand switch was located in S-1950 of Panel 1. It is estimated that Panel 1 will be full in March 2003. Consequently, it is necessary to move the fire alarm panel and fire alarm hand switch prior to closure in order to maintain access per HWFP, Module II.H.3.

This PMN is required per the WIPP HWFP, Module II.I.3. The relocation of emergency equipment identified in the RCRA Contingency Plan is a Class 1 modification pursuant to 20.4.1.900 NMAC incorporating 40 CFR §270.42, Appendix I, Item B.6.b (Contingency Plan: Replacement with functionally equivalent equipment, upgrades or relocate emergency equipment listed.)

Discussion:

The filling of Panel 1 requires that the fire alarm system be moved to a more suitable location. The Permittees will relocate the system to a location that should not require future relocation. The new location for the fire alarm panel is between E-140 and E-300 in the S-2180 drift. The fire alarm hand switch was relocated to E-140 just north of S-2580.

The fire alarm panel and fire alarm hand switch are used as a backup method for notification in the event of a fire. The primary notification system is the mine pager phone (WIPP HWFP, Attachment E, Section E-1a(1)), which is not affected by this relocation.

Revised Permit Text:

a. 1. Attachment F, Table F-6

TABLE F-6
EMERGENCY EQUIPMENT MAINTAINED
AT THE WASTE ISOLATION PILOT PLANT

Equipment	Description and Capabilities	Location
Communications		
Building Fire Alarms	Manual pull stations and automatic devices (sprinkler system flow, and smoke and thermal detectors) trigger fire alarm; locally visible and audible; visual display and alarm in Central Monitoring Room (CMR)	Guard and Security Building, Pumphouse, Warehouse/Shops, Exhaust Filter Building, Support Building, CMR/ Computer Room, Waste Handling Building, TRUPACT Maintenance Facility, SH Hoisthouse, Maintenance Shops, Guard Shack*, Auxiliary Warehouse, Core Storage Building, Engineering Building, Training Facility, Safety Building, Maintenance Shop, Hazardous Waste Storage (non-TRU) Area (Facility 474) *local alarms; not connected to the CMR
Underground Fire Alarms	Automatic/Manual; have priority over other paging channel signals but not override intercom channels; alarms sound in the general area of the control panel and are connected to the underground evacuation alarms; they also interface with the CMR.	Fire detection and control panel locations: Waste Shaft Underground Station, SH Shaft Underground Station, <u>Panel 1 (outside room 1) Between E-140 and E-300 in S-2180 Drift, E-O/N-1200, Fuel Station</u>
Site-wide Evacuation Alarm	Transmitted over paging channel of the public address system, overriding its normal use; manually initiated according to procedures requiring evacuation; audible alarm produced by tone generator at 10 decibels above ambient noise level (or at least 75 decibels); flashing strobe lights; radios and/or pagers are used to notify facility personnel outside alarm range. Monthly test are performed on the PA, site notification alarms, and plectrons.	Site-wide

a.2. Attachment F, Figure F-5

See Attachment B for the revised Figure F-5.

Attachment B

Figure F-5

Underground Emergency Equipment Locations and Underground Evacuation Routes

GENERAL INSTRUCTIONS

ANY TIME AN EVACUATION ALARM IS SOUNDED PROCEED TO THE NEAREST EGRESS HOIST STATION.

ALL CARTS, TRUCKS, ETC. WILL BE PARKED.

CONTACT THE CMR VIA MINE PAGER PHONE, DIAL PHONE, OR GATRONICS ON DIRECTION FROM THE CMR OPERATOR, PROCEED ON FOOT TO THE NEAREST EGRESS HOIST STATION.



















INFORMATION

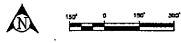
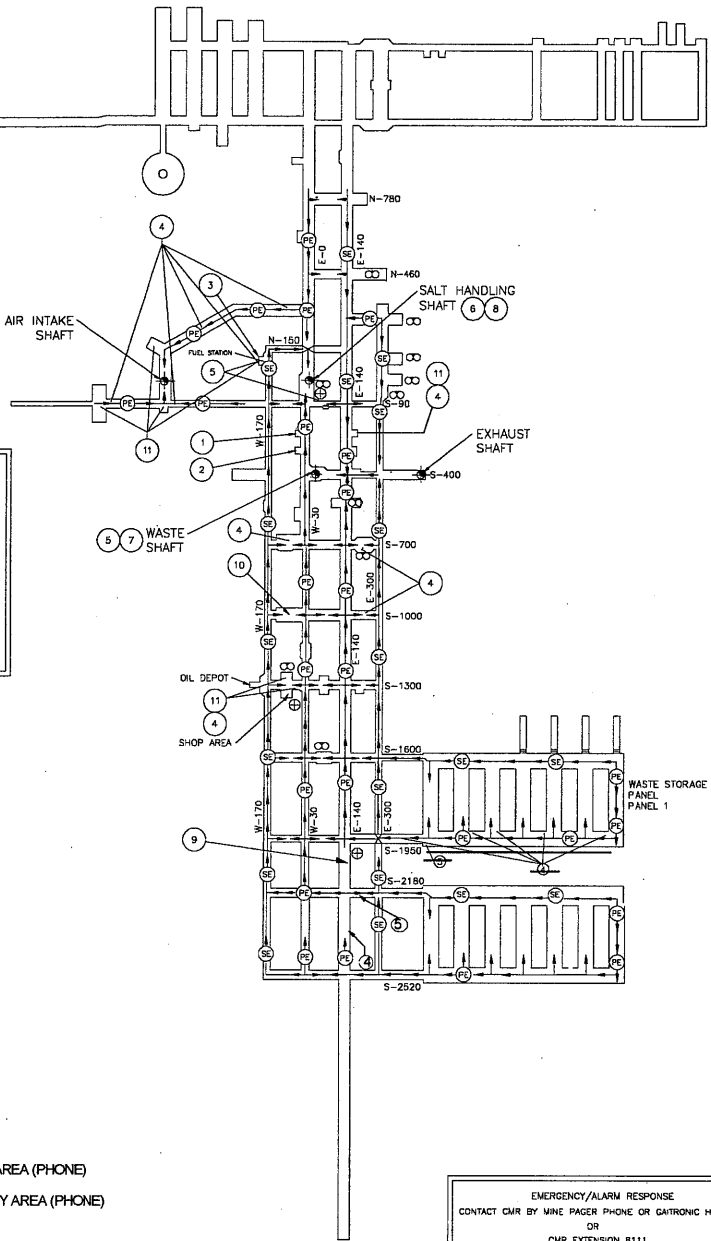
PRIMARY ESCAPE = INTAKE AIR = GREEN REFLECTIVE MARKERS INDICATE YOU ARE HEADING TOWARD A SHAFT IN INTAKE AIR

SECONDARY ESCAPE = EXHAUST AIR = RED REFLECTIVE MARKERS INDICATE YOU ARE HEADING TOWARD A SHAFT IN EXHAUST AIR

WHITE REFLECTIVE MARKERS INDICATE YOU ARE IN INTAKE AIR OR EXHAUST AIR HEADING AWAY FROM A SHAFT

NOTE:
SECONDARY ESCAPE ROUTE WILL ONLY BE USED UNTIL CLEAR ACCESS AT A BULK-HEAD PAST THE BLOCKED AREA TO THE PRIMARY ACCESS ROUTE IS FOUND.

- LEGEND
-  PRIMARY ESCAPEWAY
 -  SECONDARY ESCAPEWAY
 -  UNPASSABLE BULKHEAD (PROHIBITED AREA)
 -  VERTICAL SHAFT
 -  OVERCAST
 -  FIRST AID STATION (PHONE)
 -  EYE WASH STATION
 -  1 AMBULANCE
 -  2 RESCUE TRUCK
 -  3 DRY CHEMICAL SYSTEM
 -  4 FIRE ALARM HAND SWITCH (PHONE)
 -  5 FIRE ALARM PANEL
 -  6 SH SHAFT UNDERGROUND STATION EMERGENCY AREA (PHONE)
 -  7 WASTE SHAFT UNDERGROUND STATION ASSEMBLY AREA (PHONE)
 -  8 SALT HANDLING SHAFT ASSEMBLY AREA (PHONE)
 -  9 S-1950 & E-140 ASSEMBLY AREA (PHONE)
 -  10 S-1000 ASSEMBLY AREA (PHONE)
 -  11 THERMAL DETECTOR



EMERGENCY/ALARM RESPONSE

CONTACT CMR BY MINE PAGER PHONE OR GATRONIC HANDSET
OR
CMR EXTENSION 8111
IDENTIFY TYPE OF EMERGENCY AND LOCATION

PERSONNEL REPORT TO THE NEAREST EGRESS HOIST STATION FOR UNDERGROUND EVACUATION
PERSONNEL REPORT TO THE NEAREST DESIGNATED ASSEMBLY AREA FOR OTHER SITE EMERGENCIES AND CMR ESCAPE ROUTE INSTRUCTIONS

DURING AN EMERGENCY/ALARM RESPONSE
PERSON-IN-CHARGE IS THE U/G FE

Figure F-5
Underground Emergency Equipment Locations and Underground Evacuation Routes