

United States Government

Department of Energy

# memorandum

 Carlsbad Field Office  
 Carlsbad, New Mexico 88221


DATE: MAR 10 2004

 REPLY TO  
 ATTN OF: CBFO:NTP:RMK:VW:04-1036:UFC:5822

SUBJECT: Reconciliation of 85-gallon drums vs. 83-gallon drums designations for the AMWTP

 TO: Brian Edgerton, DOE-ID  
 Richard Cullison, DOE-ID

The Carlsbad Field Office (CBFO) has determined that a point of confusion may exist in the nomenclature used to describe the drums utilized by Advanced Mixed Waste Treatment Project (AMWTP) as over-packs for 55-gallon drums. Currently, AMWTP designates these over-packs as 83-gallon containers as reflected in numerous programmatic documents. The EPA Inspection Report No., EPA-INEEL AMWTP-08.03-8 stated in section 7.2, first paragraph on page 16, "These systems are designed to quantify the radiological components of TRU waste in 55-gallon drums and 55-gallon/83-gallon over-packs, with a variety of waste matrices, including combustibles, glass, organic and inorganic sludge, and metals."

WIPP programmatic and regulatory documents, including the Waste Analysis Plan (WAP), the Contact-Handled Transuranic Waste Acceptance Criteria for the WIPP (CH-WAC) and the TRUPACT-II and HalfPACT TRAMPAC refer to 85-gallon drum over-packs. In addition, the WIPP Waste Information System (WWIS) will only allow for the recognition of 85-gallon containers. Furthermore, the CBFO audit report for audit A-03-05, Section 5.3.1 states: "Both systems are calibrated to assay 55- and 85-gallon containers and all information in this report pertains to both sizes of container unless otherwise noted." This is consistent with WIPP programmatic and regulatory documents.

CBFO has investigated this issue and has determined that the WIPP programmatic and regulatory documents clearly allow 83-gallon over-packs to be used as over-packs for 55-gallon drums. Therefore, the 83-gallon designation is considered synonymous with the 85-gallon drum designation specified by the WIPP regulatory and programmatic documents. No further action regarding this issue is required.

If you have any questions or comments concerning this issue, please contact me at (505) 234-7374.

 Reinhard Knerr  
 National TRU Waste Certification Team Leader

040314



Brian Edgerton  
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MAR 10 2004

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