

ATTACHMENT C
SECURITY

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SECURITY

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ATTACHMENT C

SECURITY

1 Introduction

2 This Permit Attachment describes the security measures taken at the Waste Isolation Pilot Plant
3 (**WIPP**) during the Disposal Phase. It describes the security equipment and procedures in place
4 at the WIPP facility that continuously monitor and control entry onto the active portion¹ of the
5 facility, including 24-hour security surveillance, fencing, and signs.

6 C-1 Security

7 The security requirements contained in Title 20 of the New Mexico Administrative Code,
8 Chapter 4, Part 1 (20.4.1.500 NMAC (incorporating 40 CFR §264.14)), and in 20.4.1.900 NMAC
9 (incorporating 40 CFR §270.14(b)(4)), require that security be provided by 24-hour surveillance
10 or that a barrier be provided to control entry to the active portion of the facility at all times.

11 C-1a Security Procedures and Equipment

12 The WIPP facility has been designed and will be operated to fully meet the security
13 requirements contained in 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b) and (c)). The
14 WIPP facility has 24-hour security surveillance and the means to control entry to the active
15 portion of the facility. In addition, warning signs are provided. These security requirements are
16 discussed below.

17 C-1a(1) 24-Hour Surveillance System

18 The WIPP facility's 24-hour surveillance system is comprised of security officers that provide
19 protection 24 hours per day, 365 days per year. Security officers work to written procedures that
20 require visitors, contractors, and vendors to log in before they are allowed to proceed to the
21 Main Gate for access into the Property Protection Area (**PPA**) and require continuous
22 monitoring of the active portion of the facility. This system will be maintained to fulfill the
23 requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(1)).

24 The major duties of the security officers are to control personnel, vehicle, and material
25 access/egress 24 hours per day, 365 days per year. During non-operational hours, the security
26 officers conduct documented security patrols outside of the PPA, at a minimum rate of two per

¹ The active portion of the facility is the Property Protection Area (**PPA**) as described in Permit Module III. Within this area, the only area where transuranic (**TRU**) mixed wastes are handled outside of the Contact-Handled **or Remote-Handled** Packaging is inside the Waste Handling Building (**WHB**), the waste hoist, and the underground. Whenever TRU mixed waste is handled, a Controlled Area (**CA**) is established, for the purpose of radiation protection, which limits access to only trained personnel or to untrained personnel (visitors) who are continuously under the escort of trained personnel. CAs are established in accordance with the WIPP Radiation Safety Manual and are managed to limit the radiation exposure to personnel to less than 100 millirem per year. The CA is initially set at the entrances to the Parking Area Container Storage Unit (Parking Area Unit), Waste Handling Building Container Storage Unit (WHB Unit) Bay, and portions of the underground. The boundary of the CA is posted with signs as specified by the Permittees.

1 12-hour shift. Whenever scheduled security patrols cannot be made, for situations such as
2 inclement weather or an emergency, the reason for missing the patrol will be documented in the
3 security logbook. In addition to the security officers, WIPP facility employees are called upon to
4 challenge any person in the WIPP facility who is not wearing a badge or who is not under escort
5 when an escort is required. Further physical protection is provided by fences, protective lighting,
6 and locked buildings.

7 C-1a(2) Barrier and Means to Control Entry

8 The existence of a barrier and a means to control entry demonstrates compliance with
9 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(2)). Each is discussed in detail in the
10 following sections.

11 C-1a(2)(a) Barrier

12 The surface portion of the WIPP facility PPA is contained within a 35 acre (14 hectare) fenced
13 area. This area is surrounded by a permanent 7 foot (ft) (2.13 meter [m]) high chain-link fence
14 that is topped by three strands of barbed wire, for a total height of 8 ft (2.44 m). The fence
15 encloses major surface structures. The regularly inspected chain-link fencing at the WIPP
16 facility completely surrounds the active portion of the facility, thereby complying with 20.4.1.500
17 NMAC (incorporating 40 CFR §264.14(b)(2)(i)). Access is normally through the Main Gate on
18 the west side of the PPA. Two other gates are available for emergency use. One of these gates
19 is opened to allow salt trucks access to the salt pile. Use of all gates is under the supervision of
20 security.

21 C-1a(2)(b) Means to Control Entry

22 Entry into the PPA, whether by personnel or vehicles, is through controlled gates and doors.
23 WIPP-facility access-control procedures are designed to ensure that only properly identified and
24 authorized persons, vehicles, and property are allowed entrance to and exit from the facility. A
25 personnel identification and access control system is maintained within the facility. Employees
26 identify themselves with an identification badge when entering or leaving the premises. Security
27 officers require visitors to show proper authorization prior to allowing them to enter the facility. In
28 addition, visitors are required to wear a temporary badge and may require an authorized escort.
29 Because the WIPP facility controls entry to the active portion of the facility at all times, the
30 requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(2)(ii)), are met.

31 For the purposes of entry control to areas where wastes are being handled, the Waste Handling
32 Building Container Storage Unit (**WHB Unit**), the boundaries of the Parking Area Unit south of
33 the WHB, and those portions of the underground where wastes are disposed are posted as
34 Controlled Areas (**CAs**). The WIPP allows access to a CA by anyone who has successfully
35 completed General Employee Radiological Training, which is included in the General Employee
36 Training Course. Access for visitors can also be arranged with proper training.

37 Areas within the CA, however, may have further access restricted. Smaller areas may be
38 designated as Radiological Buffer Areas, Radiation Areas, and Radioactive Materials Area.
39 These smaller areas are generally within the direct vicinity of waste handling activities or waste
40 storage or disposal areas. They are sized and posted in accordance with strict guidelines.
41 Activities in these areas are performed under a Radiological Work Permit (**RWP**), and personnel

1 must be listed on the RWP before they are allowed to enter. To be listed on the RWP, personnel
2 must have the appropriate radiological and hazardous waste worker training and must have
3 available radiation dose for the task. In addition, the individuals must sign the RWP
4 acknowledging that they intend to comply with the radiological controls that are in place.
5 Personnel may be escorted into the smaller areas if they are escorted by a person who meets
6 all of the above requirements and is not performing any work in the area.

7 The WHB Unit, the Parking Area Unit, and the underground Hazardous Waste Disposal Units
8 (HWDUs) will be posted with a sign that states: "Danger: Authorized Personnel Only" in both
9 English and Spanish.

10 C-1a(3) Warning Signs

11 The permanent chain-link fence surrounding the PPA is posted at approximately 50 ft (15.24 m)
12 intervals with "No Trespassing" signs and with "Danger: Authorized Personnel Only" signs in
13 English and Spanish. The signs are legible from a distance of 25 ft (7.62 m) and can be seen
14 from any approach to the facility. These same signs, plus security and traffic signs, are also
15 located on the controlled gates. The fence and gate signs at the WIPP facility fully comply with
16 20.4.1.500 NMAC (incorporating 40 CFR §264.14(c)). Warning signs with "Controlled Area" and
17 "Hazardous Waste Management Unit" will be posted at entrances to the HWDUs prior to the
18 emplacement of waste.