

Washington

TRU Solutions LLC



WRES:08:257
UFC:5822.00

August 21, 2008

Mr. J. Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Subject: UPDATE FOR THE WIPP OPERATING RECORD (CHANGE NOTICE #2)
RICHLAND SOLID WASTE OPERATIONS COMPLEX DEBRIS (RLSWOCD.001)

Dear Mr. Bearzi:

Washington TRU Solutions LLC, on behalf of the Permittees, has approved the Change Notice Number 2 for Hanford Waste Stream Profile Form (WSPF) RLSWOCD.001

Enclosed is a copy of the approved form as required by Section B-5a of the WIPP Hazardous Waste Facility Permit, No. NM4890139088-TSDF.

If you have any questions on this matter, please contact me at (575) 234-7545.

Sincerely,

W. M. Wierzbicki, Manager
Regulatory Compliance

KG:dg

Enclosure

cc: J. Kieling, NMED ED
S. Zappe, NMED ED
C. Fesmire, CBFO ED
C. Gadbury, CBFO ED
K. Watson, CBFO ED
W. Ledford, CTAC ED
P. Gilbert, LANL ED
G. Lyshik, LANL ED
C. Walker, TechLaw ED
CBFO M&RC
WIPP Operating Record 486-06

080830



Update for WIPP Operating Record - Change Notice #2

Richland Solid Waste Operations Complex Debris (RLSWOCD.001)

Please add the following information to the WIPP Operating Record for WSPF # RLSWOCD.001. This waste stream is for Richland Solid Waste Operations Complex Debris and was approved by DOE/CBFO on June 7, 2007. Change notice #1 was approved on October 16, 2007. Please update related files as appropriate.

The RLSWOCD.001 waste stream profile form (WSPF) is being revised. The WSPF components are bolded. The updates are:

1. **WSPF, Title, version number, and date of documents used for WAP certification**

Update the list with:

HNF-2599, Hanford Site Transuranic Waste Characterization Quality Assurance Project Plan, Rev. 17 (11/6/2007)

HNF-2600, Hanford Site Transuranic Waste Certification Plan, Rev. 23 (7/14/2008)

2. **WSPF, References**

Update the list of references as follows:

4. TRU-OP-001, "Headspace Gas Samples of TRU Waste Containers," Rev. C-5, May 19, 2008.

9. WMP-400, Section 7.1.10, "TRU Waste Visual Examination Technique," Rev. 10, December 10, 2007.

3. **AK Summary, Hanford Waste Sources, *Laboratory operations***

Replace the first sentence with the following:

Hanford's plutonium production mission was supported by onsite laboratories, including the 325 Building Radiochemistry Laboratory, the 222-S Laboratory, and facilities in the Hanford 300 Area (Chemical Materials Engineering Laboratory, Radiometallurgical Laboratory, Life Sciences Laboratory, Radiochemistry Laboratory).

Revise the last sentence under *Laboratory operations* to read as follows:

The currently approved Hanford waste streams related to onsite laboratory operations are RLM325D.001 and RLM300D.001.

4. **AK Summary, Hanford Waste Sources, *Research and development***

Add the following sentence to the end of the first paragraph:

In addition, facilities (including the High Temperature Lattice Test Reactor, Fuels Development Laboratory, and the Radiation Measurements Laboratory) in the Hanford 300 Area performed research and development activities to support fuel and reactor development activities.

Revise the second sentence of the second paragraph to read as follows:

These uses included research into different configurations for plutonium-based reactor fuels conducted at Hanford and several off site facilities, including Westinghouse Advanced Reactors Division, Kerr-McGee, Babcock and Wilcox, and the GE-Vallecitos Nuclear Center.

Revise the last sentence under *Research and development* to read as follows:

Currently approved Hanford waste streams resulting from research and development activities are RLM308D.001, RLVIPAC.001, RLM231ZD.001, RLM300D.001, RLM209ED.001, and RLMGEVALD.001.

5. **AK Summary, Hanford Waste Sources, *Decontamination and decommissioning***

Add the following bullet to the bullet list under *Decontamination and decommissioning*:

- GE-Vallecitos Nuclear Center (RLMGVALD.001)

6. AK Summary, RCRA Hazardous Waste

Add the following waste streams to Table 3:

Waste Stream	EPA Hazardous Waste Numbers
RLM300D.001	D004, D005, D006, D007, D008, D009, D010, D011, D022, D027, D028, D029, D030, D034, D037, D043, F001, F002, F003, F004, and F005
RLM209ED.001	D006, D007, D008, D009, F002, F003, and F005
RLMGVALD.001	D005, D006, D007, D008, D009, D011, F002, F003, and F005

7. AK Summary, RCRA Hazardous Waste, Toxicity characteristic

Under *Toxicity Characteristic* add the following bullets:

- Facilities (including the Plutonium Recycle Test Reactor, Fresh Metal Storage Building/Special Nuclear Materials Storage Building, Metal Fuels Fabrication Facility, and the Chemical Materials Engineering Laboratory) in the Hanford 300 Area
- 209-E Building
- GE-Vallecitos Nuclear Center (Building 102)

8. AK Summary, RCRA Hazardous Waste, Toxicity characteristic

Under *Toxicity Characteristic* (p. 25 of 42), change the chemical name for the bullet for D028 from 1,2-dichlorobenzene to 1,2-dichloroethane.

9. AK Summary, Radionuclides

To the first paragraph, add Pu-244 to the list of plutonium isotopes and U-232 to the list of uranium isotopes potentially present in the waste in the first sentence. Add the following radionuclides to the list of other non-TRU radionuclides in the second sentence: selenium (Se-79), sodium (Na-22), technetium (Tc-99), curium (Cm-244).

Add the following sentence to the first paragraph: Other TRU radionuclides present in trace amounts include californium (Cf-249) and curium (Cm-243 and -245).

10. AK Summary, Reference List:

Add the following references:

47. Acceptable Knowledge Document for 300 Area Mixed Debris Waste Stream, RLM300D, HNF-33244, Rev. 1, June 2008.
48. AK Document for Hanford Site 209-E Critical Mass Laboratory Mixed Debris Waste Stream RLM209ED, HNF-35539, Rev. 1, June 2008.
49. Acceptable Knowledge Document for the General Electric – Vallecitos Mixed Transuranic Debris Waste Stream, RLMGVALD, HNF-34377, Rev. 1, June 2008.

11. Appendix B

Add the following lines to Table B-1

Waste Stream Profile Number: RLM300D.001	Waste Stream Name: Richland 300 Area Mixed Debris (RLM300D)
TWBIR, Rev. 2 Numbers: N/A	
TWBIR-2004, Rev. 0 Numbers: RL-T110, RL-T112, RL-T116, RL-T118, RL-W602, RL-W603, RL-W604, RL-W605, RL-W606, RL-W607, RL-W608, RL-	

W610, RL-W615, RL-W622, RL-W674, RL-W675, RL-W676, RL-W677, RL-W678, RL-W679, RL-W680, RL-W681, RL-W685, RL-W689, RL-W690, RL-W691, RL-W692, RL-W693, RL-W695, RL-W696	
Waste Stream Profile Number: RLM209ED.001	Waste Stream Name: Richland 209-E Critical Mass Laboratory Mixed Debris (RLM209ED)
TWBIR, Rev. 2 Numbers: N/A	
TWBIR-2004, Rev. 0 Numbers: RL-T114	
Waste Stream Profile Number: RLMGEVALD.001	Waste Stream Name: Richland General Electric – Vallecitos Nuclear Center Decontamination and Decommissioning Debris
TWBIR, Rev. 2 Numbers: N/A	
TWBIR-2004, Rev. 0 Numbers: RL-T143	

Reason/Justification for Change:

Changes to the existing, approved WSPF and AK Summary for the RLSW OCD.001 waste stream are required as a result of recent approval of the RLM300D.001, RLM209ED.001, and RLMGEVALD.001 waste streams. The RLSW OCD waste stream can only contain waste generated from processing of approved waste streams, thus the RLSW OCD.001 WSPF needs to be revised as new waste streams are approved. The specific reasons for these changes are outlined below.

The WSPF documents used for WAP certification have been updated to reflect the current revision of the documents.

The WSPF references have been updated to reflect the current revisions.

The AK summary has been updated in the appropriate locations to reflect the approval of the RLM300D.001, RLM209ED.001, and RLMGEVALD.001 waste streams and to add the generating facilities, the Hanford 300 Area, the 209-E Building, and the GE-Vallecitos Nuclear Center (Building 102), as sources of waste to be processed through the Solid Waste Operations Complex facilities.

Table 3 of the AK Summary has been revised to reflect the HWNs present in waste from the Hanford 300 Area facilities, the 209-E Building, and the GE-Vallecitos Nuclear Center. Bullets were also added to identify the source facilities. In addition, an editorial change was made correcting the name of the chemical associated with the D028 HWN from 1,2-dichlorobenzene to 1,2-dichloroethane).

The radionuclides Pu-244, U-232, Na-22, Se-79, Tc-99, Cf-249, and Cm-243, -244, and -245 have been added to the Radionuclides discussion based on their presence in trace quantities in the RLM300D.001, RLM209ED.001, or RLMGEVALD.001 waste streams.

The AK documents (HNF-33244, Rev. 1; HNF-35539, Rev. 1; and HNF-34377, Rev. 1) for the Hanford 300 Area, 209-E Building, and GE-Vallecitos Nuclear Center, respectively, have been added to the reference list.

The TWBIR numbers for the Hanford 300 Area, 209-E Building, and GE-Vallecitos Nuclear Center from the approved waste streams were added to Table B-1.

The changes submitted in this change notice do not affect the assignment of Hazardous Waste Numbers or the Waste Matrix Code as identified in the previously approved Waste Stream Profile Form.

Waste Stream Profile Form Certification:

I have reviewed the information in this Waste Stream Profile Form and have found the information consistent with the information in the analytical batch data reports.


Signature of AKE

Dan Arrenholz AKE
Printed Name and Title

7-15-08
Date

I hereby certify that I have reviewed the information in this Waste Stream Profile Form, and it is complete and accurate to the best of my knowledge. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.


Signature of Site Project Manager

K.M. McDonald, SPM
Printed Name and Title

7/15/08
Date