



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 AUG 6 2010



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

Subject: Review of Update for the WIPP Operating Record (Change Notice #4) First and Second Stage Sludge (BNINW216, Rev. 1)

Dear Mr. Bearzi:

The Department of Energy Carlsbad Field Office (CBFO) has approved the Change Notice Number 4 for First and Second Stage Sludge (BNINW216, Rev. 1) by the Advanced Mixed Waste Treatment Project (AMWTP).

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

If you have questions on this matter, please contact me at (575) 234-7300.

Sincerely,

David C. Moody
 Manager

Enclosure(s)

cc: w/enclosure
 S. Zappe, NMED *ED

cc: w/o enclosure
 J. Kieling, NMED ED
 G. Basabilvazo, CBFO ED
 N. Castaneda, CBFO ED
 C. Fesmire, CBFO ED
 C. Gadbury, CBFO ED
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*ED denotes electronic distribution



Mr. James Bearzi

-2-

bcc:

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**Update for WIPP Operating Record (Change Notice #4)
First/Second Stage Sludge (BNINW216, Rev. 1)**

Please add the following information to the WIPP Operating Record for Waste Stream Profile Form (WSPF) BNINW216, Revision 1. This waste stream is First/Second Stage Sludge and was approved by DOE/CBFO on September 17, 2004. Change Notice #1 was approved on February 2, 2005, Change Notice #2 was approved on January 24, 2007, and Change Notice #3 was approved on April 2, 2008.

This WSPF is being revised. The WSPF Form-1195 and AK Summary components are bolded. The updates are:

1. WSPF Form-1195, Technical contact phone number

Update phone number to (208) 557-6425

2. WSPF Form-1195, Date of audit report approval by NMED

Revise NMED audit approval dates to include 7/2/2004, 1/9/2009, and 1/8/2010

3. WSPF Form-1195, Title, version number, and date of documents use for WAP Certification

Update the following procedures:

Certification Plan for INL Transuranic Waste, MP-TRUW-8.1, Rev. 19, 6/30/2010

Quality Assurance Project Plan, MP-TRUW-8.2, Rev. 13, 6/30/2010

CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC), CCP-PO-003, Rev. 11, 6/04/2009

4. WSPF Form-1195, Waste Stream Information, WIPP ID

Add IN-BNINW216

5. WSPF Form-1195, Waste Stream Information, Description from the WTWBIR

Change description as follows:

See RPT-TRUW-09, Section 1.2.6

6. WSPF Form 1195, Waste Stream Information, Number of Drums

Change Number of Drums to 22,304

**Update for WIPP Operating Record (Change Notice #4)
First/Second Stage Sludge (BNINW216, Rev. 1)**

7. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Acronyms and Abbreviations

Delete BBWI from list and add the following:

ATWIR	Annual Transuranic Waste Inventory Report
CFR	Code of Federal Regulations
CH-TRAMPAC	Contact-Handled Transuranic Waste Authorized Methods for Payload Control
CH-TRUCON	Contact-Handled TRU Waste Content Codes
DOE	Department of Energy
DOT	Department of Transportation
EDMS	Electronic Document Management System
FGE	fissile gram equivalents
INL	Idaho National Laboratory
NACE	National Association of Corrosion Engineer
nCi/g	nanocuries per gram
ppm	part per million
ppmv	part per million volume
PRQL	program required quantitation limit
PWTS	Process Waste Transfer System
RFP	Rocky Flats Plant
SDA	Subsurface Disposal Area
TIC	tentatively identified compound
TRU	Transuranic
TSA-RE	Transuranic Storage Area-Retrieval Enclosure
TSCA	Toxic Substances Control Act
UCL ₉₀	90% upper confidence limit
VE	visual examination
VOCs	volatile organic compounds
WTS	Waste Tracking System

Also spell out the above acronyms in their first use in the AK Summary, as required.

8. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), References

Revise the note as follows:

Advanced Mixed Waste Treatment Project (AMWTP) documents such as procedures, Acceptable Knowledge (AK) Reports, and operating instructions are cited without revision numbers or dates. The most recent revisions of these documents are available through the AMWTP Electronic Document Management System (EDMS). Previous revisions are available on EDMS.

Revise reference as follows:

6. DOE/WIPP-01-3194, CH-TRU Waste Content Codes (CH-TRUCON), Rev. 37, June 2010

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First/Second Stage Sludge (BNINW216, Rev. 1)**

Replace references as follows:

4. CKA-002-10, Memo to file, Volume Estimate for BNINW216 First/Second Stage Sludge Waste Stream, July 5, 2010 [C877A]
32. Material Safety Data Sheets, Aquaset[®] (sodium montmorillonite) and Aquaset II-G[®] (sepiolite), Fluid Tech, January 1, 2005 and November 11, 2008 [P881S]

Add the following references:

48. Material Safety Data Sheet, Micro-cel[®]E, Celite Corporation, January 17, 2007 [P808S]
49. RCM-001-10, Memo to file, Earliest Pack Date for Rocky Flats Waste Retrieved from Pits 11 and 12, July 05, 2010 [C875S]
50. DOE/TRU-09-3425, Annual Transuranic Waste Inventory Report - 2009, U.S. Department of Energy, Carlsbad, New Mexico, Rev. 0 [P838A]

9. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Cross Reference

Delete cross reference table and delete cross reference page from table of contents.

10. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.2.3, Waste Stream Volume

Replace Section 1.2.3 as follows:

22,304 containers (4,639 m³) - current volume ⁽⁴⁾

The estimated percentage of the waste greater than 100 nCi/g is 92%. The estimated percentage of waste equal to or less than 100 nCi/g is 8%. ⁽¹²⁾

11. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.2.4, Generation Dates

Delete sub-section 1.2.4.1 and replace section 1.2.4 as follows:

AMWTP stored containers of RFP First/Second Stage Sludge waste were generated from 1968 to 1988. Waste stored at AMWTP with generation dates (i.e., pack date) later than 1988 are the result of repackaging (e.g., waste characterization/treatment activities). ^(2, 49)

12. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.2.5, TRUCON Codes

Change title to:

Contact-Handled TRU Waste Content Codes (CH-TRUCON) ^(5, 6)

Update for WIPP Operating Record (Change Notice #4)

First/Second Stage Sludge (BNINW216, Rev. 1)

13. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.2.6, Transuranic Waste Baseline Inventory Report (TWBIR) Information:

Change title to:

Transuranic Waste Baseline Inventory Report (TWBIR) and Annual Transuranic Waste Inventory Report (ATWIR) Information ^(6, 50)

Replace Section 1.2.6 as follows:

ATWIR Waste Stream ID: IN-BNINW216 (formerly identified as TWBIR Waste Stream IDs: IN-W216.875, IN-W216.98, IN-W216.99, IN-W228.101, IN-W228.102, IN-W228.103, and IN-W228.883)

TWBIR waste stream descriptions:

IN-W216.875, IN-W216.98, IN-W216.99: IDC 001 waste consists of immobilized materials generated from first-stage treatment operations in Rocky Flats Plant (RF) Building 774. Aqueous liquids coming into the process originated from Building 771 recovery operations. The liquids were made basic with sodium hydroxide to precipitate iron, magnesium, etc. that also carried down the relatively small precipitate of plutonium and americium hydrated oxides. The precipitate was filtered to produce a sludge (IDC 001), which was placed in a drum with Portland cement. Beginning in 1979, sludge waste from second-stage treatment was combined with first-stage sludge. The combined sludges were also assigned IDC 001. IDC 001 was discontinued in 1986 when the immobilization process changed, and has since been assigned IDC 800.

IN-W228.101, IN-W228.102, IN-W228.103, and IN-W228.883: IDC 002 waste consists of immobilized materials generated from second-stage treatment operations in RF Building 774. Aqueous liquids to be treated originated from first-stage treatment and from numerous buildings on plant site. The liquids were treated in the same manner as the liquids from the first stage, and the resulting sludge (IDC 002) were placed into a drum with Portland cement. Prior to 1973, second-stage sludge may contain miscellaneous debris.

IN-W216.875, IN-W216.98, IN-W216.99, IN-W228.101, IN-W228.102, IN-W228.103, and IN-W228.883: The process that produced sludge from RF Building 774 (IDC 800) was the same process as that which generated IDC 001. The difference between the two IDCs was the immobilization process. For IDC 800, the sludge was co-fed into a drum with a diatomite and Portland cement mixture, which formed a solid monolith after curing. IDC 800 is most accurately described by the combination of TWBIR numbers for IDC 001 and IDC 002, therefore all TWBIR numbers associated with IDC 001 or IDC 002 were applied to IDC 800.

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First/Second Stage Sludge (BNINW216, Rev. 1)**

ATWIR waste stream description:

IN-BNINW216 (aqueous sludge wastes from Building 774) was generated from a carrier precipitation and immobilization process (sludge mixed with diatomite and Portland cement). The First/Second Stage Sludge waste stream is comprised of Item Description Codes (IDCs) ID-RF-001, ID-RF-002, and ID-RF-800. The First/Second Sludge waste stream consists of >50% by volume secondary sludge or filter cake from wastewater treatment processes or heavy metal sludges from recovery processes. Two waste matrix codes have been assigned to this waste stream because the immobilization process for this waste stream was changed in 1986. Prior to 1986 the first/second stage sludge was placed into a drum with Portland cement. The excess liquid was immobilized, but a solid monolith was not formed. Subsequent to 1986 the sludge was co-fed into a drum with a diatomite and Portland cement mixture, which formed a solid monolith after curing. ^{a (8)}

Add the following footnote:

- a. The description in the ATWIR will be revised in the next annual update to include IDCs ID-RF-741 and ID-RF-742.

14. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.2.8, Waste Matrix Codes

Change first line to:

S3121 - Waste Water Treatment Sludge (IDC 001, IDC 002, IDC 741, IDC 742)

15. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.3.1, Description

Change first paragraph and replace Table 1-1 as follows:

The First/Second Stage Sludge waste stream consists of drums containing First Stage Sludge (IDCs 001 and 741), Second Stage Sludge (IDCs 002 and 742), or Solidified Sludge – Bldg 774 (IDC 800).

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First/Second Stage Sludge (BNINW216, Rev. 1)

Table 1-1. Physical Waste Form Descriptions for First/Second Stage Sludge

IDC	WMC	Description
001 741	S3121	<p>This waste consists of immobilized materials generated from first stage treatment operations in RFP Building 774. Aqueous liquids coming into the process originated from Building 771 recovery operations. The liquids were made basic with sodium hydroxide to precipitate iron, magnesium, etc., that also carried down the relatively small precipitate of plutonium and americium hydrated oxides. The precipitate was filtered to produce sludge which was placed in a drum with Portland cement (IDCs 001 and 741) and assigned container prefix 741. IDC 001 was assigned to the first stage sludge by RFP. IDC 741 is used to identify first stage sludge drums retrieved from the Subsurface Disposal Area (SDA) Pits 11 and 12. The waste was generated prior to 1972, shipped to Idaho National Laboratory (INL), and buried in SDA Pits 11 and 12. The waste was subsequently retrieved from the pits and placed into the Transuranic Storage Area-Retrieval Enclosure (TSA-RE) prior to 1979. Because RFP did not assign IDCs to waste until mid-1971, AMWTP assigned IDC 741 to these waste containers. ^(1, 2, 4)</p> <p>Beginning in 1979, sludge waste from second stage treatment was combined with first stage sludge and assigned container prefix 7412. The combined sludges were also assigned IDC 001. IDC 001 was discontinued in 1986 when the immobilization process changed, and has since been assigned IDC 800. ⁽⁴³⁾</p>
002 742	S3121	<p>This waste consists of immobilized materials generated from second stage treatment operations in RFP Building 774. Aqueous liquids to be treated originated from first stage processing and from numerous buildings on plant site. The liquids were treated in the same manner as the liquids from the first stage, and the resulting sludge were placed in a drum with Portland cement (IDCs 002 and 742) and assigned container prefix 742. IDC 002 was assigned to the second stage sludge by RFP. IDC 742 is used to identify second stage sludge drums retrieved from the SDA Pits 11 and 12. The waste was generated prior to 1972, shipped to INL, and buried in the SDA Pits 11 and 12. The waste was subsequently retrieved from the pits and placed into the TSA-RE prior to 1979. Because RFP did not assign IDCs to waste until mid-1971, AMWTP assigned IDC 742 to these waste containers. ^(1, 2, 4)</p> <p>Prior to 1973, second stage sludge may contain miscellaneous debris, as identified by visual examination (VE) and Real-Time Radiography (RTR) inspections of second stage waste containers. The following types of debris have been identified: cellulosic debris, plastic debris, leaded rubber gloves, rubber debris, ⁽¹⁸⁾ rubber gloves, and metal debris. AK indicates that up until 1973, other items (e.g., electric motors, bottles containing residual liquid chemical wastes and mercury, and mercury batteries and lithium batteries) may be present in second stage sludge (IDCs 002 and 742) containers. These items have not been confirmed through characterization activities.</p>
800	S3150	<p>The process that produced sludge from RFP Building 774 (IDC 800) was the same process as that which generated combined first and second stage sludge (container prefix 7412). The difference between the two IDCs was the immobilization process. For IDC 800, the sludge was co-fed into a drum with a diatomite and Portland cement mixture, which formed a solid monolith after curing. ⁽⁴³⁾</p>

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First/Second Stage Sludge (BNINW216, Rev. 1)

- 16. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.4.4.1, Material Inputs – RF IDC 001**

Change title to:

1.4.4.1 Material Inputs – RF IDCs 001 and 741

- 17. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.4.4.2, Material Inputs – RF IDC 002**

Change title to:

1.4.4.2 Material Inputs – RF IDCs 002 and 742

- 18. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.4.4, Material Inputs**

Add new sub-section as follows:

1.4.4.5 Absorbent Addition

Non-hazardous immobilization/solidification agents (e.g., Aquaset[®], Aquaset II-G[®] or Micro-Cel[®] E) may be added to waste containers by AMWTP to treat prohibited liquids. Aquaset is a sodium montmorillonite clay material, Aquaset II-G[®] is a sepiolite clay, and Micro-Cell E is a synthetic calcium silicate. ^(32, 48)

- 19. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.5, Prohibited Items**

Delete the first paragraph and accompanying bullet.

Replace the 2nd paragraph as follows:

The following items are prohibited in waste containers shipped to Waste Isolation Pilot Plant (WIPP) as documented in MP-TRUW-8.1, Certification Plan for INL Transuranic Waste and MP-TRUW-8.2, Quality Assurance Project Plan. ^(46, 47)

Add the following as the first and last bullets:

- Liquid waste
- Sealed containers greater than four (4) liters.

Change the last paragraph as follows:

Excess liquid is a common prohibited item identified during RTR and VE in this waste stream. Other prohibited items are expected to be very rare. ^(1, 2) Drums with excess liquid may be treated by adding non-hazardous absorbent (e.g., Aquaset[®], Aquaset II-G[®], or

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First/Second Stage Sludge (BNINW216, Rev. 1)

Micro-Cel[®] E) prior to shipment. ^(32, 48) Drums with other prohibited items will be treated or rejected as appropriate. Drums with prohibited items will not be part of the waste stream shipped to the WIPP.

20. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.6.2, Hazardous Determination, Characteristic Waste, Ignitability

Add the following to the end of the 1st paragraph:

Containers identified with liquid in excess of WIPP waste acceptance criteria (WAC) limits may be treated using non-hazardous solidification agents (e.g., Aquaset, Aquaset II-G[®], or Micro-Cel[®] E) to render the waste acceptable prior to shipment ^(32, 48)

The waste materials in this waste stream are not compressed gas and do not contain compressed gas, and the waste does not meet the United States Department of Transportation (DOT) definition of an oxidizer as defined in 49 CFR 173 and is not capable of causing fire through friction, absorption of moisture, or spontaneous chemical change. This waste stream does not exhibit the characteristic of ignitability (D001).

21. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.6.2, Hazardous Determination, Characteristic Waste, Corrosivity

Add the following to the last paragraph:

Containers identified with liquid in excess of WIPP-WAC limits may be treated using non-hazardous solidification agents to render the waste acceptable prior to shipment (e.g., Aquaset[®], Aquaset II-G[®], or Micro-Cel[®] E). ^(32, 48) This waste stream does not exhibit the characteristic of corrosivity (D002).

22. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.6.2, Hazardous Determination, Characteristic Waste, Reactivity

Add the following to the end of the first paragraph:

The waste is not capable of detonation or explosive reaction if subjected to a strong initiating source of if heated under confinement. The waste is not readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure. The materials do not contain explosive material and are not forbidden explosives or Division 1.1, 1.2, or 1.3 (Class A or B) explosives as defined in 49 CFR Part 173.

Add the following to the beginning of the last paragraph:

Containers identified with compressed gases or aerosol cans will have the prohibited items treated/removed prior to shipment. Containers with liquid in excess of WIPP-WAC limits may be treated with non-hazardous solidification agents to render the waste acceptable prior to shipment (e.g., Aquaset[®], Aquaset II-G[®], or Micro-Cel[®] E). ^(32, 48)

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First/Second Stage Sludge (BNINW216, Rev. 1)

23. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 1.7, Radionuclides

Replace Section 1.7 as follows:

The two most prevalent radioisotopes in waste stream BNINW216 can be any two of the following: ^{239}Pu , ^{240}Pu , ^{235}U , and ^{238}U , depending on the relative mixture of weapons-grade plutonium, enriched uranium, and depleted uranium in the waste. The First/Second stage sludge waste stream does not contain concentrations of plutonium in excess of 20% by weight for the aggregate of any material category. ^(12, 47)

As a minimum, to confirm existing AK data, the ratios of the two most prevalent radionuclides in the isotopic mix are compared. ⁽²²⁾ The two most prevalent radionuclides by weight expected in the Building 774 sludge waste drums are ^{239}Pu and ^{240}Pu .

The recommended default mass fraction values of the plutonium isotopes to be used as the AK based values and confirmed during non-destructive assay (NDA) are listed in RPT-TRUW-07, *Determination of Radioisotopic Content in TRU Waste Based on Acceptable Knowledge.* ⁽¹²⁾

Table 1-4 provides a breakdown of the radionuclides present so that the general isotopic content of the waste is established.

Table 1-4. Nominal compositions of radionuclide mixtures at RFETS (wt %)

Weapons-Grade Plutonium (WG Pu)	Enriched Uranium (EU)	Depleted Uranium (DU)
^{238}Pu 0.01 – 0.05%	^{231}Th negligible	^{231}Th negligible
^{239}Pu 92.8 – 94.4%	^{234}Th negligible	^{234}Th negligible
^{240}Pu 4.85 – 6.5%	^{234}U ~0.1%	^{234}U ~0.0006%
$^{241}\text{Pu}^a$ 0.3 – 1.0%	^{235}U ~90 – 93%	^{235}U ~0.2%
^{242}Pu 0.005 – 0.60%	^{236}U ~0.4%	^{238}U ~99.8%
	^{238}U ~5.3%	

a. Includes ^{241}Am daughter product

Mass fraction values for ^{241}Am , ^{233}U , ^{235}U , and ^{238}U previously determined for Rocky Flats at the INEEL were based on individual gamma spectrometric measurements. The ^{234}U activities were calculated based on ratios with depleted uranium isotopes. The criteria used for selection and the formulas for determining the ^{234}U mass are presented in RPT-TRUW-07. ⁽¹²⁾

Radionuclides such as ^{244}Cm , ^{232}Th , and ^{236}U may be found in Rocky Flats wastes. ⁽¹²⁾ Americium-241, ^{234}U , and ^{237}Np are expected in most of the Rocky Flats TRU waste containers due to radioactive decay and ingrowth. ⁽¹⁴⁾ Americium-243 and ^{245}Cm , other isotopes resulting from radioactive decay, have also been detected during AMWTP

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NDA. ^(15, 20, 21, 38) Potassium-40 may be detected when other radionuclides in a container are significantly lower in concentration. In some cases ⁴⁰K has been detected in higher concentrations than ²³⁹Pu and contributes to 95% of the radionuclide hazard. ⁽¹⁶⁾

AMWTP will employ payload management practices in accordance with the WAC for waste stream BNINW216. The estimated total waste volume for BNINW216 is 4,431 m³. The estimated percentage of the waste greater than 100 nCi/g is 92%. The estimated percentage of waste equal to or less than 100 nCi/g is 8%.

24. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 2.1, Waste Packaging

Add the following paragraph at the end of Section 2.1:

Some of the 55-gallon drums may be overpacked into 83- or 85-gallon drums. Either four 55-gallon drums or two 83- or 85-gallon drums, with either the drum lid filters or the drum lids removed, may be direct loaded into a standard waste box (SWB) equipped with approved filters.

25. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 2.2, Flammability Consideration

Add the following as the last sentence:

Payloads containing flammable VOCs are managed in accordance with CCP-PO-003, Central Characterization Project (CCP) Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC).

26. AK Summary, First/Second Stage Sludge (RPT-TRUW-09), Section 2.3, Tradename Index

Add the following as 2nd and 3rd rows:

Aquaset II-G [®]	Granular sepiolite clay ⁽³²⁾
Micro-Cel [®] E	Synthetic calcium silicate ⁽⁴⁸⁾

Reason/Justification for the Change

Item 1. WSPF Form-1195, phone number of technical contact was updated to reflect change.

Item 2. WSPF Form-1195, audit report approval dates were updated to reflect all audit dates.

Item 3. WSPF Form-1195, documents used for WAP certification were revised to reflect the most recent revisions.

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First/Second Stage Sludge (BNINW216, Rev. 1)

Items 4, 5, & 13. WSPF Form-1195 and AK Summary Section 1.2.6 TWBIR information was updated to reflect the WIPP ID and description from the most recent annual update of the TWBIR.

Item 6 and 10. WSPF Form-1195 and AK Summary Report Section 1.2.3, Waste Stream Volume was changed due to the addition of First/Second Stage Sludge containers retrieved from the SDA Pits 11 and 12. The retrieved waste was originally generated at Rocky Flats prior to 1972, shipped to the INL and buried in the SDA Pits 11 and 12. The waste was subsequently retrieved from the pits prior to 1979 and placed in the TSA-RE. The First/Second Stage Sludge waste containers retrieved from Pits 11 and 12 were generated from the same process as the waste containers already included in BNINW216. Therefore, there is no impact on the EPA hazardous waste numbers assigned to waste stream BNINW216.

Item 7. AK Summary Report Acronym and Abbreviation list was updated to reflect all acronyms and abbreviations used in the report. The text of the AK Summary was also updated to spell out the first use of each acronym.

Item 8. The AK Summary Report References was changed to update the note to reflect current practices of Document Control and to identify references that support information revised or updated in the AK Summary.

Item 9. The AK Summary Report, Cross Reference table was deleted because the AK source document cross reference information is no longer needed.

Item 11. AK Summary Report Section 1.2.4, Generation Dates was changed to reflect an earlier waste generation date due to the addition of First/Second Stage Sludge waste containers retrieved from Pits 11 and 12.

Item 12. AK Summary Report Section 1.2.5, TRUCON Codes was updated to delete reference that no longer applies.

Items 14, 15, 16, and 17. AK Summary Report Section 1.2.8 (Waste Matrix Codes), Section 1.3.1 (Description), and Sections 1.4.4.1 and 1.4.4.2 (Material Inputs) were updated to incorporate the addition of information regarding IDCs 741 and 742 assigned to First/Second Stage Sludge waste retrieved from Pits 11 and 12.

Item 18. AK Summary Report Section 1.4.4.5, Material Inputs was changed to provide information regarding absorbents that may be used by AMWTP to treat prohibited liquids.

Item 19. AK Summary Report Section 1.5, Prohibited Items was changed to address all prohibited WIPP waste in accordance with MP-TRUW-8.1, Certification Plan for INL Transuranic Waste and MP-TRUW-8.2, Quality Assurance Project Plan. The last paragraph was modified to clarify disposition of containers identified as containing prohibited liquid that may be treated with non-hazardous absorbents.

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First/Second Stage Sludge (BNINW216, Rev. 1)

Items 20, 21 and 22. AK Summary Report Section 1.6.2, Hazardous Determination language under Ignitability, Corrosivity, and Reactivity were changed to support the recent WIPP Permit Modification concerning prohibited liquids.

Item 23. AK Summary Report general grammar or usage corrections were made to the text in several places that did not affect the summary information or intent.

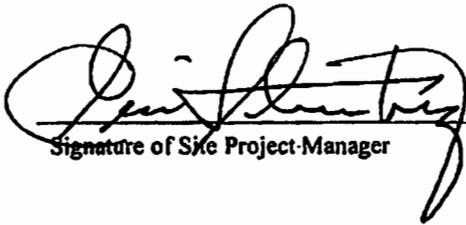
Item 24. AK Summary Report Section 2.1, Waste Packaging was changed to add a paragraph describing potential direct loading of containers into SWBs.

Item 25. AK Summary Report Section 2.2, Flammability Consideration revised to include sentence identifying procedure used to manage payloads containing flammable VOCs.

Item 26. AK Summary Report Section 2.3, Tradename Index table updated to include absorbents that may be used by AMWTP to treat prohibited liquids.

Update for the WIPP Operating Record (BNINW216) certification:

I hereby certify that I have reviewed this Update for WIPP Operating Record, 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

Eric P. Schweinsberg, SPM

Printed Name and Title

7/27/10

Date