



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 September 21, 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 #1 Remote Handled Heterogeneous Debris Waste from the Argonne National Laboratory (AERHDM)

Dear Mr. Bearzi:

The Department of Energy, Carlsbad Field Office (CBFO) has approved the Change Notice #1, Remote Handled Heterogeneous Debris Waste from the Argonne National Laboratory (ANL) by the Central Characterization Project at the ANL-East.

Enclosed is a copy of the form as required by Section B-5a of the Waste Isolation Pilot Plant 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

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

cc: w/o enclosure
 J. Kieling, NMED ED
 C. Gadbury, CBFO ED
 J. R. Stroble, CBFO ED
 C. Fesmire, CBFO ED
 G. Basabilvazo, CBFO ED
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 K. Watson, CBFO ED
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 C. Walker, TechLaw ED

*ED denotes electronic distribution



**Update for WIPP Operating Record (Change Notice #1)
Remote Handled Heterogeneous Debris from the Argonne National Laboratory (AERHDM)**

Please add the following information to the WIPP Operating Record for Waste Stream Profile Form (WSPF) AERHDM. This waste stream is Remote Handled Heterogeneous Debris from the Argonne National Laboratory and was approved by DOE/CBFO on May 22, 2008.

This WSPF is being revised. The WSPF components are bolded. The updates are:

1. WSPF, Date of audit approval by New Mexico environmental Department (NMED)

Update the audit approval date(s) to include 7/31/08, 10/31/08, and 11/12/09.

2. WSPF, Title, version number, and date of documents used for WAP Certification

Update the following procedures:

CCP-PO-001, CCP Transuranic Waste Characterization Quality Assurance Project Plan, Revision 18, June 30, 2010

CCP-PO-002, CCP Transuranic Waste Certification Plan, Revision 24, June 30, 2010

3. WSPF, Waste Stream Information, Number of Canisters

Revise the number of canisters from 48 to 92.

Revise the footnote associated with the number of canisters as follows: This waste stream consists of 44 30-gallon drums, with a projection of approximately 180 30-gallon and 50 55-gallon drums. Three 30-gallon or 55-gallon drums will be packaged into 1 canister.

4. WSPF, Waste Stream Information, Applicable TRUCON Content Numbers

Update the list of applicable TRUCON Content Numbers to include AE 322.

The revised section will identify the following TRUCON Content Numbers:
AE 321, AE 322 and AE 325.

5. WSPF, Required Program Information, Required Waste Stream Information, and Supplemental Documentation

Update reference CCP-AK-ANLE-500, Rev. 3, May 8, 2008 to CCP-AK-ANLE-500, Rev. 6, September 21, 2010.

6. Summation of Aspects of AK Summary Report: AERHDM, Overview, Last Paragraph

Update reference CCP-AK-ANLE-500, Rev. 3, May 8, 2008 to CCP-AK-ANLE-500, Rev. 6, September 21, 2010.

7. Summation of Aspects of AK Summary Report: AERHDM, Waste Stream Identification Summary, Waste Stream Volume

Revise the number of projected canisters from 33 to 77.

Revise the footnote associated with the number of canisters as follows:

This waste stream consists of 44 30-gallon drums, with a projection of approximately 180 30-gallon and 50 55-gallon drums. Three 30-gallon or 55-gallon drums will be packaged into 1 canister.

8. Summation of Aspects of AK Summary Report: AERHDM, Waste Stream Identification Summary, TRUCON Content Numbers

Update the list of applicable TRUCON Content Numbers to include AE 322.

The revised section will identify the following TRUCON Content Numbers: AE 321, AE 322 and AE 325.

9. Summation of Aspects of AK Summary Report: AERHDM, New Section

Add a new section entitled "Justification for the Selection of Radiography or VE" and include the following justification.

Containers in Lot 1 of this waste stream were characterized using VE. VE meets all of the Data Quality Objectives for Nondestructive Examination for the AERHDM waste stream.

Reason/Justification for the Change

The audit report approval date(s) have been revised to reflect the most recent approval dates.

Documents used for WAP certification have been revised to reflect the most recent revisions.

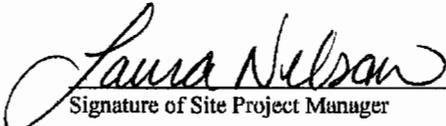
The approved TRUCON Content Code AE 322 is added to this waste stream to support the packaging configuration of waste from the K-wing hot cell. The waste stream volume is also updated to reflect the waste generated from K-wing.

Reference to CCP-AK-ANLE-500, Rev. 3, May 8, 2008 is being updated to reflect the most current version, CCP-AK-ANLE-500, Rev. 6, September 21, 2010.

A new section, entitled "Justification for the Selection of Radiography or VE", is added to meet current WIPP HWFP requirements.

Update for the WIPP Operating Record (AERHDM) 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

Laura Nelson, SPM

Printed Name and Title

9-21-10

Date