



Department of Energy
Carlsbad Field Office
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January 14, 2011



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

Reference: December 14, 2010 letter from James Bearzi, NMED to Mr. Edward Ziemianski, CBFO and Mr. Farok Sharif, WTS concerning Request for Information CCP Waste Stream LA-MHD01.001 Waste Isolation Pilot Plant EPA ID# NM4890139088

Dear Mr. Bearzi:

Enclosed please find our response to the referenced letter. Acceptable Knowledge resolutions (DR) that are associated with containers moved into or out of waste stream LA-MHD01.001 based upon CCP characterization activities are identified on the attached DVD in a folder titled "DRs". Documents identified as requiring declassification by LANL can be reviewed at your convenience by Q-cleared NMED personnel at the CCP Project Offices in Carlsbad or at LANL.

1. Copies of CCP real-time radiography (RTR) video/audio media for the containers listed in Attachment 1.

Copies of the RTR video/audio media are included on the attached DVD in a folder titled "Request 1" for all containers listed in Attachment 1.

2. For any RTR video/audio media that do not describe or identify the "material" in these containers, submit other CCP characterization data that provides a more thorough description of the "material" in each container listed in Attachment 1 (i.e., what the material is, what the waste matrix code is for the material, and which waste material parameter the material's weight is assigned to in Section 4 of the BDRs).

The RTR video/audio media on the attached DVD describe or identify the "material" in the containers. No additional CCP characterization data are provided.

3. Section 5.1 of CCP-AK-LANL-006, Revision 9, states: "Container specific records are reviewed for each container to verify the physical composition and origin of the waste stream inventory." Provide copies of the AK documents (e.g., LANL Waste Profile Forms, any other container specific records) CCP reviewed to determine the containers listed in Attachment 1 were appropriately delineated as belonging to LA-MHD01.001.



Transuranic Waste Storage Records (TWSR) were the documents reviewed in support of assigning containers to waste stream LA-MHD01.001. In support of NMED's request, LANL was able to complete the declassification process for the containers listed in Attachment 1 of your request. These documents are included on the attached DVD in a folder titled "Request 3".

4. Table 2 (Waste Material Parameter Estimates for LA-MHD01.001) of CCP-AK-LANL-006, Revision 9, states that the "Weight Percent Range" for Inorganic Matrix is 0.00% - 72.48%. Provide the container IDs for any container with greater than 50% of its weight assigned to Inorganic Matrix. Also provide copies of the RTR BDRs and video/audio media (or alternately, VE BDRs), as well as the AK documents discussed in Section 5.1 of CCP-AK-LANL-006 (see Number 3 above) for these containers.

- a) Eight containers are identified with greater than 50% of the waste weight assigned to inorganic matrix. They are; 53126, 53220, 60467, 84254, 84589, 86083, S818266, S835402.
- b) The associated AK documentation, RTR video/audio media, RTR BDRs, and VE BDR are included on the attached DVD in a folder titled "Request 4".

5. Several BDRs for the 37 containers listed in Attachment 1 include "Hagen cans" in the Section 3: Container Inventory and Comments (e.g., Container 63676 in BDR LA-RTR2-08-0093). Provide a description of a "Hagen can," including its general purpose, function, and usage at LANL.

Hagan/Hagen containers are used to package waste for on-site storage and transport at LANL. The Hagan containers are equipped with filters to prevent gas buildup and threaded seals to ensure that the lid will continue to function if the container is dropped. Hagan containers are approved to hold radioactive material outside of glove-boxes. These are the cans that have been traditionally used to hold materials that are stored in vaults and they are used to hold materials that are then assayed by LANL. Assuming that non-destructive assay (NDA) shows that the materials are candidates for disposal, then the Hagan containers and their contents are packaged into approved Type A containers (e.g., 55-gallon drums or) as waste and sent to TA-54 for characterization and certification by CCP for WIPP disposal. Additionally, photographs and a manufacturer's drawing is included for NMED reference on the attached DVD in a folder titled "Request 5".

6. The revision history of CCP-AK-LANL-006 states that Revision 7 was "Revised to include additional containers to waste stream LA-MHD01.001 and to update the affected sections (types and quantities of TRU waste generated, waste material parameters, estimated radionuclide distributions)..." Provide a list of the containers that were added to LA-MHD01.001 by Revision 7 and the reason(s) they were added, including AK source documents discussed in Section 5.1 of CCP-AK-LANL-006 (see Number 3 above).

The list of containers that were added to Revision 7 of LA-MHD01.001 is included on the DVD in a folder titled "Request 6" as a spreadsheet. The following Table summarizes the spreadsheet.

| Number of containers | Generic Reason | Further Explanation |
|----------------------|------------------------------|--|
| 580 | LANL Suspect TRU added to AK | These were drums that were previously identified by LANL to be probable LLW. |
| 1102 | Homogeneous – Suspect S5000 | These were drums managed by LANL as S3000, however, CCP reclassified these as Debris (S5000) based on AK review. |
| 71 | Newly Generated | These were drums generated at TA-55 since the previous revision of the AK. |
| 164 | Continuing AK Review | These are drums that were part of the LANL inventory which CCP had not reviewed/identified as belonging to LA-MHD01.001. |
| 16 | Waste Matrix Code Hold | These are containers that LANL managed as S3000 that CCP reclassified as S5000 based on AK review. However during RTR it was determined that these drums were, in fact S3000 and removed from the LA-MHD01.001 waste stream. |

The following Source Documents from Section 5.1 of CCP-AK-LANL-006, Revision 7 will require declassification by LANL:

| Source Document Tracking number | Title |
|---------------------------------|-------------------------|
| AK6-M019 | Generator Documentation |

| | |
|----------|--|
| AK6-M156 | Project 2010 Container Specific Database Information for LA-MHD01.001. |
| AK6-M215 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from 2500 Set. |
| AK6-M216 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from AK6 Remaining Set. |
| AK6-M217 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from AK7 Remaining Set. |
| AK6-M218 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from Imagic Printout Set. |
| AK6-M219 | Electronic image of TWSRs and RSWD Forms from Imagic Software. |
| AK6-M222 | CONCERT Database. |
| AK6-M224 | LANL Hard Copy RSWDs and TWSRs for LA-MHD01 and LA-MHD02. |
| AK6-M226 | LANL Hard Copy RSWDs and TWSRs for LA-MHD01 and LA-MHD02. |
| AK6-M238 | NUGEN Drum TWSRs. |
| AK7-M018 | Generator Documentation (RSWD/TWSRs). |
| AK7-M020 | CONCERT Database Query, Physical Parameter Inventory Analysis for Waste Stream LA-MHD02.002. |

7. The revision history of CCP-AK-LANL-006 states that Revision 8 was "Revised to remove originally generated homogeneous containers from waste stream LA-MHD01.001 added during Revision 7 ... " Provide a list of the containers that were removed from LA-MHD01.001 by Revision 8 and the reason(s) they were removed, including AK source documents discussed in Section 5.1 of CCP-AK-LANL-006 (see Number 3 above).

The list of containers that were removed per Revision 8 of LA-MHD01.001 is included on the attached DVD in a folder titled "Request 7" as a spreadsheet. The following Table summarizes the spreadsheet.

| Number of containers | Generic Reason | Further Explanation |
|----------------------|--------------------------------------|--|
| 1118 | Homogeneous – Suspect S5000 | These were drums managed by LANL as S3000, however, CCP reclassified these as Debris (S5000) based on AK review. |
| 28 | Previous Characterization Questioned | NONE |
| 582 | LANL SUSPECT TRU removed from AK | These were drums that were previously identified by LANL to be probable LLW. |
| 128 | RPGD | Drums were repackaged and the container numbers no longer exist. |

The following Source Documents from Section 5.1 of CCP-AK-LANL-006, Revision 8 will require declassification by LANL:

| Source Document Tracking number | Title |
|---------------------------------|--|
| AK6-M019 | Generator Documentation. |
| AK6-M156 | Project 2010 Container Specific Database Information for LA-MHD01.001. |
| AK6-M215 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from 2500 Set. |
| AK6-M216 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from AK6 Remaining Set. |

| | |
|----------|--|
| AK6-M217 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from AK7 Remaining Set. |
| AK6-M218 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from Imagic Printout Set. |
| AK6-M219 | Electronic image of TWSRs and RSWD Forms from Imagic Software. |
| AK6-M222 | CONCERT Database. |
| AK6-M224 | LANL Hard Copy RSWDs and TWSRs for LA-MHD01 and LA-MHD02. |
| AK6-M226 | LANL Hard Copy RSWDs and TWSRs for LA-MHD01 and LA-MHD02. |
| AK7-M018 | Generator Documentation (RSWD/TWSRs). |
| AK7-M020 | CONCERT Database Query, Physical Parameter Inventory Analysis for Waste Stream LA-MHD02.002. |

8. The revision history of CCP -AK -LANL-006 states that Revision 9 was "Revised to include additional containers to waste stream LA-MHD01.001 that were originally characterized as homogeneous by Los Alamos National Laboratory ... " Provide a list of the containers that were added to LA -MHD01.001 by Revision 9 and the reason(s) they were added, including AK source documents discussed in Section 5.1 of CCP -AK-LANL-006 (see Number 3 above).

The list of containers that were added to Revision 9 of LA-MHD01.001 is included on the attached DVD in a folder titled "Request 8" as a spreadsheet. The following Table summarizes the spreadsheet.

| Number of containers | Generic Reason | Further Explanation |
|----------------------|------------------------------|--|
| 593 | LANL SUSPECT TRU added to AK | These were drums that were previously identified by LANL to be probable LLW. |

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|-----|--------------------------------|--|
| 737 | Homogeneous – Suspect S5000 | These were drums managed by LANL as S3000, however, CCP reclassified these as Debris (S5000) based on AK review. |
| 576 | Newly Generated | These were drums generated at TA-55 since the previous revision of the AK. |
| 22 | Continuing AK Review | These are drums that were part of the LANL inventory which CCP had not reviewed/identified as belonging to LA-MHD01.001. |
| 149 | RPGD | New drum numbers generated after repackaging drums. |
| 34 | Waste Matrix Code Hold | These are containers that LANL characterized as S3000 that CCP reclassified as S5000 based on AK review. However during RTR it was determined that these drums were, in fact S3000 and removed from the LA-MHD01.001 waste stream. |

The following Source Documents from Section 5.1 of CCP-AK-LANL-006, Revision 9 will require declassification by LANL:

| Source Document Tracking number | Title |
|---------------------------------|--|
| AK6-M019 | Generator Documentation. |
| AK6-M156 | Project 2010 Container Specific Database Information for LA-MHD01.001. |
| AK6-M215 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from 2500 Set. |

| | |
|----------|--|
| AK6-M216 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from AK6 Remaining Set. |
| AK6-M217 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from AK7 Remaining Set. |
| AK6-M218 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from Imagic Printout Set. |
| AK6-M219 | Electronic image of TWSRs and RSWD Forms from Imagic Software. |
| AK6-M222 | CONCERT Database. |
| AK6-M224 | LANL Hard Copy RSWDs and TWSRs for LA-MHD01 and LA-MHD02. |
| AK6-M226 | LANL Hard Copy RSWDs and TWSRs for LA-MHD01 and LA-MHD02. |
| AK6-M238 | NUGEN Drum TWSRs. |
| AK6-M273 | LA-MHD01.001 TWSRs. |
| AK6-M274 | TWSRS for Containers 8000 Series. |
| AK6-M275 | TA-55 NUGEN TWSRs. |
| AK6-M276 | TA-55 VE NUGEN TWSRs. |
| AK7-M018 | Generator Documentation (RSWD/TWSRs). |
| AK7-M020 | CONCERT Database Query, Physical Parameter Inventory Analysis for Waste Stream LA-MHD02.002. |

9. Provide Revision 10 of CCP-AK-LANL-006. If containers were added to or removed from LA-MHD01.001 in Revision 10, provide a list of the containers and the reason(s) they were added or removed, including AK source documents discussed in Section 5.1 of CCP-AK-LANL-006 (see Number 3 above).

The list of containers that were added to Revision 10 of LA-MHD01.001 is included on the attached DVD in a folder titled "Request 9" as the first spreadsheet. The following Table summarizes the spreadsheet for adding containers.

| Number of containers | Generic Reason | Further Explanation |
|----------------------|----------------------|---|
| 713 | Below Grade | In preparation for retrieval activities, updates to various AK Reports were completed including identification of containers Below Grade. |
| 423 | Newly Generated | These were drums generated at TA-55 since the previous revision of the AK. |
| 26 | Continuing AK Review | These are drums that were part of the LANL inventory which CCP had not reviewed/identified as belonging to LA-MHD01.001. |
| 2101 | RPGG | New drum numbers generated after repackaging drums. |

The list of containers that were removed in Revision 10 of LA-MHD01.001 is included on the attached DVD in a folder titled "Request 9" as the second spreadsheet. The following Table summarizes the removal spreadsheet.

| Number of containers | Generic Reason | Further Explanation |
|----------------------|-----------------|--|
| 60 | Recharacterized | These were drums that were previously identified by LANL to be probable LLW. |
| 1952 | RPGD | Drums were repackaged and the container numbers no longer exist. |

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| 38 | Waste Matrix Code Hold | These were drums managed by LANL as S3000, however, CCP reclassified these as Debris (S5000) based on AK review. During RTR it was determined that these drums were, in fact S3000 and removed from the LA-MHD01.001 waste stream. |
|----|---------------------------|--|

The following Source Documents from Section 5.1 of CCP-AK-LANL-006, Revision 10 will require declassification by LANL:

| Source Document Tracking number | Title |
|------------------------------------|--|
| AK6-C179 | Evaluation of volume and Calculation of Individual and Total Radionuclide Masses and Activities for Waste Stream LA-MHD01.001. |
| AK6-M019 | Generator Documentation. |
| AK6-M156 | Project 2010 Container Specific Database Information for LA-MHD01.001. |
| AK6-M215 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from 2500 Set. |
| AK6-M216 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from AK6 Remaining Set. |
| AK6-M217 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from AK7 Remaining Set. |
| AK6-M218 | LANL Hard Copy TWSRs for LA-MHD01 and LA-MHD02 from Imagic Printout Set. |
| AK6-M219 | Electronic image of TWSRs and RSWD Forms from Imagic Software. |
| AK6-M222 | CONCERT Database. |

| | |
|----------|--|
| AK6-M224 | LANL Hard Copy RSWDs and TWSRs for LA-MHD01 and LA-MHD02. |
| AK6-M226 | LANL Hard Copy RSWDs and TWSRs for LA-MHD01 and LA-MHD02. |
| AK6-M238 | NUGEN Drum TWSRs. |
| AK6-M273 | LA-MHD01.001 TWSRs. |
| AK6-M274 | TWSRS for Containers 8000 Series. |
| AK6-M275 | TA-55 NUGEN TWSRs. |
| AK6-M276 | TA-55 VE NUGEN TWSRs. |
| AK7-M018 | Generator Documentation (RSWD/TWSRs). |
| AK7-M020 | CONCERT Database Query, Physical Parameter Inventory Analysis for Waste Stream LA-MHD02.002. |

We certify under penalty of law that this document and all enclosures were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibilities of fines and imprisonment for knowing violations.

If you should have questions, please contact J.R. Stroble at (575) 234-7313.

Sincerely,

George T. Baschilways for

Edward Zlemianski, Acting Manager
Carlsbad Field Office

M.F. Sharif

M.F. Sharif, General Manager
Washington TRU Solutions LLC

Enclosure

Mr. James P. Bearzi

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January 14, 2011

cc: w/enclosure

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Site Documents ED

RCRA Chronology ED

WIPP Operating Record ED

CBFO M&RC

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