ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
May 3, 2011

RECEIVED
MAY 1 2011

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

Subject: Transmittal of the Information Requested During the November 2, 2010, Inspection by the NMED at the Waste Isolation Pilot Plant

Dear Mr. Bearzi:

The purpose of this letter is to provide information requested by the New Mexico Environment Department (NMED), Hazardous Waste Bureau during their inspection of the Waste Isolation Pilot Plant in Carlsbad, New Mexico, on November 2, 2010.

Enclosed is a table listing the documentation requested by the NMED at the inspection opening meeting. The boxes that accompany this letter contain the documentation listed in this table.

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, the 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 possibility of fines and imprisonment for knowing violations.

Please contact George T. Basabilvazo at (575) 234-7488 if you have any questions or require additional information.

Sincerely,

Edward Ziemianski, Acting Manager
Carlsbad Field Office

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

Enclosures (14)

cc: w/o enclosures
S. Zappe, NMED *ED
J. Kieling, NMED ED
CBFO M&RC
*ED denotes electronic distribution

CBFO:OESH:GTB:MDA:11-0758:UFC 2300.00

110502

2010 WIPP Inspection-Items: New Mexico Environment Department (NMED)
Request Description
Initial Date of Inspection: November 2, 2010

ITEM	DOCUMENTATION REQUESTED/PROVIDED
1.	Information and data regarding any derived waste that has been generated and accumulated in the Waste Handling Building (WHB) from September 23, 2009 to November 2, 2010. Permit Condition II.C.5.
	1.a. Narrative supporting this request (1 Page)
2.	Documentation regarding all Occurrence Reports from September 23, 2009 to November 2, 2010.
	2.a. Copies of all Occurrence Reports from September 23, 2009 to November 2, 2010 (101 Pages)
3.	Copies of waste manifests of Contact-Handled (CH) Waste shipments with payloads disposed of within the fifteen weeks prior to this inspection (November 2, 2010), of all Remote-Handled (RH) Waste shipments received from September 23, 2009 to November 2, 2010, and of all shipments (both CH and RH) from LANL in calendar year 2009. In addition, obtain photocopies of all in house routing, transfer, and/or 'cleared to deposit' documents for the one week prior to this inspection.
	3.a. Copies of the Waste Manifests of CH shipments with payloads disposed of within the fifteen weeks prior to this inspection (November 2, 2010) (484 Pages)
	3.b. All RH shipments received from September 23, 2009 to November 2, 2010 (164 Pages)
	3.c. All shipments (both CH and RH) from LANL in Calendar Year 2009 (144 Pages)
	3.d. Copies of all in-house routing, transfer, and/or "cleared to deposit" documents for the one week prior to this inspection (119 Pages)
4.	Documentation demonstrating that the storage capacities of the Parking Area Unit and Parking Area Surge Storage (from Table III.A.2) and WHB Units (CH Bay Storage Area, CH Bay Surge Storage Area, Derived Waste Storage Area, RH Bay, Cask Unloading Room, Hot Cell, Transfer Cell, and Facility Cask Loading Room) (from Table III.A.1) were not exceeded during a one-month period in Calendar Year 2010 (Selected by the inspector, will be the entire month of May 2010).
	4.a. WIPP Procedure (WP) 05-WH1101, Revision 12, CH Surface Transuranic Mixed Waste Handling Area Inspections (19 Pages)
	4.b. WP 05-WH1101, Attachment 2, Trailer Parking Area and CH Bay Container Storage Area Weekly Inspection, April 2010 (4 Pages)
	4.c. WP 05-WH1101, Attachment 1, Surface CH TRU Mixed Waste Handling Area Preoperational Inspection, May 2010 (36 Pages)
	4.d. Operations Log for CH, May 2010 (125 Pages)
	4.e. WP 05-WH1744, Revision 11, Surface RH Transuranic Mixed Waste Handling Area Inspections (20 Pages)
	4.f. WP 05-WH1744, Attachment 3, Trailer Parking Area and RH Container Storage Area Weekly Inspection (8 Pages)
	4.g. WP 05-WH1744, Attachment 1, Surface RH TRU Mixed Waste Handling Area Preoperational Inspection (12 Pages)
	4.h. Operations Log for RH, May 2010 (52 Pages)
	4.i. WP 08-NT3020, Attachment 3, TRU Waste Receipt Log, April 30, 2010 – June 4, 2010 (6 Pages)

ITEM	DOCUMENTATION REQUESTED/PROVIDED
5.	Generate and provide a histogram from the WIPP Waste Information System (WWIS) database, plotting the number of containers versus the number of days in storage, demonstrating whether storage times were ever exceeded from September 23, 2009 to November 2, 2010.
	5.a. Histogram plotting the number of containers versus the number of days in storage for containers received from September 23, 2009 to November 2, 2010 (3 Pages)
6.	Photocopies of calibration records from September 23, 2009 to November 2, 2010 for all specific types of instruments (one instrument of each specific type) used to demonstrate permit compliance with Attachments D, L, N, N1, and Q. Radiological instruments are not considered demonstration of permit compliance.
	6.a. Copies of the 2010 Hydrology Instrument Calibration Records from September 23, 2009 to November 2, 2010 (14 Pages)
	6.b. Copies of the Instrumentation and Control Calibration Records from September 23, 2009 to November 2, 2010 (39 Pages)
	6.c. Copies of the Underground Geomechanical Instrumentation Calibration Records from September 23, 2009 to November 2, 2010 (26 Pages)
	6.d. Copies of the Volatile Organic Compound and Hydrogen/Methane Monitoring Instrument Calibration Records from September 23, 2009 to November 2, 2010 (11 Pages)
7.	Names for all individuals in the following positions: Hazardous Waste Workers, TRU Mixed Waste Handlers, Facility Shift Engineers, Facility Shift Managers, Central Monitoring Room Operators, Radiographers (Levels 1 and 2), Visual Examination Experts (Levels 1 and 2), and Permittees' Management Representative. Inspector will request summary of training records for up to 10% of the names provided to verify training and qualification are current.
	7.a. RCRA Matrix (9 Pages)
8.	Copies of any coordinating agreements specified in the Contingency Plan, Section F-6 that were revised from September 23, 2009 to November 2, 2010. Provide a copy of the current Contingency Plan as well.
	8.a. Copy of the Memorandum of Understanding between the United States Department of Energy Carlsbad Field Office and the Sheriff of Eddy County Concerning Local Law Enforcement Support (4 Pages)
	8.b. Copy of the Memorandum of Understanding between the United States Department of Energy Carlsbad Field Office and the Sheriff of Lea County Concerning Local Law Enforcement Support (5 Pages)
	8.c. Copy of the Contingency Plan in effect on November 2, 2010 (102 Pages)
9.	Current copies of all WIPP technical procedures referenced in Permit Attachment P that were revised from September 23, 2009 to November 2, 2010. In addition, provide current copies of all procedures related to management, storage, and disposal of RH TRU Waste regulated under the permit that were revised from September 23, 2009 to November 2, 2010.
	9.a. WP 02-EM1002, Revision 4, Electric Submersible Pump Monitoring System Installation and Operation (19 Pages)
	9.b. WP 02-EM1005, Revision 6, Groundwater Serial Sample Analysis (69 Pages)
	9.c. WP 02-EM1006, Revision 7, Serial and Final Sample Collection (This revision was current from September 15, 2010 to February 1, 2011) (23 Pages)
	9.d. WP 02-EM1014, Revision 5, Groundwater Level Measurement (9 Pages)
	9.e. WP 02-EM3003, Revision 7, Data Validation and Verification of RCRA Constituents (38 Pages)
	9.f. WP 02-RC.04, Revision 7, RCRA Training Documentation (This revision was current from August 30, 2010 to December 29, 2010) (9 Pages)
	9.g. WP 12-HP1100, Revision 15, Radiological Surveys (This revision was current from May 27, 2010 to December 20, 2010) (27 Pages)

ITEM	DOCUMENTATION REQUESTED/PROVIDED
	9.h. WP 13-1, Revision 29, Washington TRU Solutions LLC Quality Assurance Program Description (This revision was current from May 10, 2010 to November 15, 2010) (127 Pages)
	9.i. WP 05-WH1709, Revision 13, RH-TRU 72-B Trailer Unloading (18 Pages)
	9.j. WP 05-WH1710, Revision 21, 72-B RH Processing (39 Pages)
	9.k. WP 05-WH1711, Revision 9, 6-Ton Diesel Forklift 52-H-007C (10 Pages)
	9.l. WP 05-WH1712, Revision 3, RH-TRU 72-B Cask Operation (10 Pages)
	9.m. WP 05-WH1713, Revision 10, Facility Cask and Facility Cask Rotating Device (14 Pages)
	9.n. WP 05-WH1714, Revision 3, RH Cask Preparation Station 41-Z-076 (6 Pages)
	9.o. WP 05-WH1719, Revision 6, 25-Ton Cask Unloading Room Crane (7 Pages)
	9.p. WP 05-WH1722, Revision 11, 10-160B RH Processing (35 Pages)
	9.q. WP 05-WH1726, Revision 0, RH Waste Downloading/Emplacement Using Distributed Controls (25 Pages)
	9.r. WP 05-WH1730, Revision 0, Horizontal Emplacement and Retrieval Equipment Assembly Using Distributed Controls (17 Pages)
	9.s. WP 05-WH1731, Revision 0, Horizontal Emplacement and Retrieval Equipment Disassembly Using Distributed Controls (15 Pages)
	9.t. WP 05-WH1732, Revision 0, RH Training Canister and Shield Plug Retrieval Using Distributed Controls (18 Pages)
	9.u. WP 05-WH1742, Revision 5, Hot Cell Bridge Crane 41-T-104 (15 Pages)
	9.v. WP 05-WH1746, Revision 8, 2.5-Ton JIB Crane 41-T-201 (8 Pages)
	9.w. WP 05-WH1758, Revision 8, RH Waste handling Abnormal Operations (53 Pages)
10.	Complete copy of the WWIS [WIPP Waste Information System] Data Change Log from September 23, 2009 to November 2, 2010.
	10.a. WWIS Data Change Log Report from September 23, 2009 to November 2, 2010 (704 Pages)
11.	Maps of waste disposal location and quantity from September 23, 2009 to November 2, 2010 as specified in Permit Condition IV.H.2.
	11a. CH Maps (19 Pages)
	11b. RH Maps (10 Pages)
12.	Records, including revised procedures, of all adjustments made to the ventilation system based upon results of the most recent Test and Balance Report and quarterly airflow checks from September 23, 2009 to November 2, 2010. Adjustments include, but are not limited to 1) changes to the underground configuration; 2) exhaust fan adjustments; and 3) replacement, repair, calibration, and maintenance of equipment (e.g., air flow sensors, fans, regulators, etc.).
	12.a. Work Orders - In addition to a negative NVP, the E-300 drift is too restrictive for passing the air from both the emplacement and construction panels. These increased pressure losses further reduced airflow to both panels 5 and 6. MVS recommends that E-300 be cleared of un-used overcasts and other structures not needed for ventilation control. (144 Pages)
	12.b. Work Orders – The airflow sensor in W-170 (BH533) could not be calibrated and should be replaced. The relative humidity sensor at the Salt Shaft Station should also be replaced. Problems were also noted for differential pressure sensors at BH313 and at the AIS. (51 Pages)
	12.c. Work Orders – Mandoors in BH 528 and BH 337 need repair. (37 Pages)
	12.d. Work Orders – Only the 700C fan FloSonic airflow sensor measured within 10% accuracy. All other fan FloSonic sensors were significantly out of calibration. This usually is indicative of a lack of maintenance (e.g. cleaning the sensor heads). The FloSonic sensors on 700A, 700B, 860A and 860B need to be cleaned and recalibrated.

ITEM	DOCUMENTATION REQUESTED/PROVIDED
	The 860 fans did not have FloSonic instruments. We relied on Kurz flow instruments which were obsolete. We installed a FloSonic instrument at Station B to capture the sum of the flow from the 860 fans. (70 Pages)
	12.e. Work Orders – Only the 700C fan FloSonic airflow sensor measured within 10% accuracy. All other fan FloSonic sensors were significantly out of calibration. This usually is indicative of a lack of maintenance (e.g. cleaning the sensor heads). The FloSonic sensors on 700A, 700B, 860A and 860B need to be cleaned and recalibrated. Cleaning and maintenance of the 700 fan FloSonic instruments is performed on the quarterly fan flow check PMs. One additional work order was performed as corrective maintenance to the 700A FloSonic. (130 Pages)
	12.f. WP 04-VU1001, Surface Underground Ventilation and Filtration System Operation (revised procedures related to the underground ventilation system) (41 Pages)
	12.g. WP 04-VU1002, Operability Testing of Underground Filtration (revised procedures related to the underground ventilation system) (19 Pages)
13.	Analytical laboratory results of Panel 5 disposal room VOC monitoring any time in 2010 of any one round, both paper and as an electronic spreadsheet (selected by the inspector).
	13.a. Analytical laboratory results of Panel 5 disposal room VOC monitoring any time in 2010 of any one round (4 Pages) (Electronic version also)