



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

JUN 3 2011



Mr. John Kieling, Acting 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 #1) Remote-Handled Heterogeneous Debris Waste from the Radiochemistry Development Center (OR-REDC-RH-HET)

Dear Mr. Kieling:

The Carlsbad Field Office (CBFO) has approved the Change Notice #1 for waste stream profile form Remote-Handled (RH) Heterogeneous Debris Waste from the Radiochemistry Development Center (OR-REDC-RH-HET) by the Central Characterization Project at the Oak Ridge National Laboratory.

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

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

Sincerely,

Edward Ziemianski
 Acting Manager

Enclosure

cc: w/enclosures:
 S. Holmes, NMED *ED

cc: w/o enclosure
 J. R. Stroble, CBFO ED
 N. Castaneda, CBFO ED
 C. Fesmire, CBFO ED
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*ED denotes electronic distribution



Update for WIPP Operating Record (Change Notice #1)

Remote Handled Heterogeneous Debris Waste from the Radiochemistry Engineering Development Center

(OR-REDC-RH-HET)

Please add the following information to the WIPP operating record for Waste Stream Profile Form (WSPF) OR-REDC-RH-HET. This waste stream is Remote Handled Heterogeneous Debris Waste from the Radiochemistry Engineering Development Center and was approved by DOE/CBFO on February 20, 2009.

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

1. WSPF, Date of audit report approval by NMED

Update the audit approval date to include September 9, 2008, November 2, 2009 and August 12, 2010.

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

Update the following procedure revision numbers and approval dates:

CCP-PO-001, CCP Transuranic Waste Characterization Quality Assurance Project Plan, Revision 19, December 29, 2010

CCP-PO-002, CCP Transuranic Waste Certification Plan, Revision 25, December 29, 2010

CCP-PO-027 CCP/TRU Waste Processing Center/Oakridge National Laboratory Interface Document, Revision 3, December 29, 2010

3. WSPF, Waste Stream Information, Applicable TRUCON Content Codes

Update the list of applicable TRUCON Content Codes to include OR 321 and OR 322.

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

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

Update reference CCP-AK-ORNL-500, revision 1, October 3, 2008 to CCP-AK-ORNL-500, revision 2, January 13, 2011.

5. WSPF, Note (3)

Revise Note (3) as follows: TWBIR numbers OR-W211, OR-W214 and OR-REDC-RH-HET also apply.

6. Summation of Aspects of AK Summary Report: OR-REDC-RH-HET, Overview

Update reference CCP-AK-ORNL-500, revision 1, October 3, 2008 to CCP-AK-ORNL-500, revision 2, January 13, 2011

7. Summation of Aspects of AK Summary Report: OR-REDC-RH-HET, Waste Stream Identification Summary, TRUCON Content Number (TRUCON):

Update the list of applicable TRUCON Content Codes to include OR 321 and OR 322.

8. Summation of Aspects of AK Summary Report: OR-REDC-RH-HET, Waste Stream TWBIR Identification, Footnote 1

Revise Footnote 1 as follows: TWBIR numbers OR-W211, OR-W214 and OR-REDC-RH-HET also apply.

9. Summation of Aspects of AK Summary Report: OR-REDC-RH-HET, RCRA Determinations - Hazardous Waste Determinations, new section entitled Hazardous Waste Management

The REDC waste has been historically managed in accordance with ORNL waste management practices in compliance with the requirements required by the Tennessee Department of Environment and Conservation. The assignment of EPA HWNs to ORNL waste began in 1994. EPA inspections were conducted as late as 2003 and the containers were subsequently identified as "RCRA suspect" with no specific HWNs assigned. Therefore, the historical waste management was considered with respect to characterization of waste stream OR-REDC-RH-HET.

10. Summation of Aspects of AK Summary Report: OR-REDC-RH-HET, new section entitled Justification for the Selection of Radiography or Visual Examination

Visual examination (VE) has been used to characterize waste stream OR-REDC-RH-HET. Visual examination was selected as the characterization method because the waste containers were not previously packaged and VE is an acceptable characterization method for meeting all the Data Quality Objectives for NDE of waste stream OR-REDC-RH-HET.

Reason/justification for the change

The audit report approval date has been revised to reflect the most recent approval date.

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

Reference to CCP-AK-ORNL-500, revision 1, October 23, 2008 is being updated to reflect the most current version, CCP-AK-ORNL-500, revision 2, January 13, 2011.

The approved TRUCON Content Codes are being added to support higher container wattage limits for waste stream OR-REDC-RH-HET. The TRUCON Content Codes were approved in October 2008.

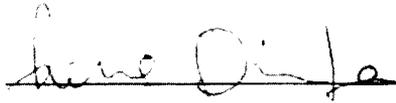
The TWBIR number OR-REDC-RH-HET has been added to reflect the current ATWIR. Two new sections entitled Hazardous Waste Management and Justification for the Selection of Radiography or Visual Examination have been added to reflect current WIPP HWFP requirements.

11. EPA Hazardous Waste Number Assignment

The EPA Hazardous Waste Numbers assigned to the waste stream have not changed.

Update for the WIPP Operating Record (OR-REDC-RH-HET) 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.



Irene Quintana, SPM

5/4/11

Signature of Site Project Manager

Printed Name and Title

Date