



**From:** Kliphuis, Trais, NMENV  
**Sent:** Wednesday, January 04, 2012 2:49 PM  
**To:** 'McCauslin, Susan - DOE'  
**Cc:** Chavez, Rick - RES; Kehrman, Bob; Kieling, John, NMENV  
**Subject:** ventilation and "described" versus "specified"?

Greetings,

Although Don seems to be OK with the current draft, we are having some internal debate over the ventilation change.

Specifically, when we look at Figures 3 and 4 of the PMR Item 2 we see that the worker on the bottom left of Fig 3 who is "preparing the next disposal room" (also potentially doing RH emplacement although not shown in the Figure) and with the new language this worker would not be covered if there was a fall in the active room.

In addition to this, there is still also concern about removing the ventilation requirement for RH active rooms. According to staff, the requirement was subject to extensive discussions between NMED, the Permittees, and stakeholders, as well as a public comment period and a hearing, during renewal in 2010 and the Permittees' current concerns were not raised when the specific requirement was added to the Permit (Attachment O) during that process.

NMED's written testimony stated the following: "The minimum active room ventilation rate [35,000 scfm] condition is based on the direct relationship between the minimum active room ventilation rate and the underground worker exposure concentration of VOCs in an open room. Any decrease in the active room mine ventilation rate would result in an increase in the concentration of VOCs in an open room."

and concluded: "NMED believes that specification of the minimum active room ventilation rate of 35,000 scfm when workers are present is appropriate."

I believe the language I proposed and the draft versions I sent last week would address these concerns while still provide for the stated intent of the modification. Please let me know your thoughts.

And finally, I would like to know whether you have a preference for the definitions below? ("described" versus "specified") Don Hancock believes "the convention in the permit would be "specified" rather than "described" though both terms are used."

Current version in draft:

1.5.19. Filled Room

"Filled Room" means a room in an Underground Hazardous Waste Disposal Unit as described in Permit Part 4 will no longer receive waste for emplacement.

1.5.20. Active Room

"Active Room" means a room in an Underground Hazardous Waste Disposal Unit as described in Permit Part 4 that contains emplaced TRU mixed waste and is not a filled room

Proposed:

1.5.19. Filled Room

"Filled Room" means a room in an Underground Hazardous Waste Disposal Unit as specified in Permit Part 4 that will no longer receive waste for emplacement.



1.5.20. Active Room

“Active Room” means a room in an Underground Hazardous Waste Disposal Unit as specified in Permit Part 4 that contains emplaced TRU waste and is not a filled room.

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