



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Thursday, October 11, 2012 2:29 PM
To: Allen, Pam, NMENV
Subject: FW: Training Records Request

Importance: High

WIPP file

From: Kliphuis, Trais, NMENV
Sent: Tuesday, September 04, 2012 4:30 PM
To: jose.franco@wipp.ws; farok.sharif@wipp.ws
Cc: Kieling, John, NMENV; Davis, Jim, NMENV; Pullen, Steve, NMENV; Basabilvazo, George - DOE; Holmes, Steve, NMENV; Maestas, Ricardo, NMENV; Kliphuis, Trais, NMENV
Subject: Training Records Request
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Messrs. Franco and Sharif,

On December 13 and 14, 2011, the New Mexico Environment Department (NMED) conducted a hazardous waste compliance evaluation inspection and conditions of the hazardous waste facility permit inspection at the Waste Isolation Pilot Plant (WIPP). At that time, NMED requested several records that included documentation that training requirements are met. Those are:

Item 7 of the 2011 WIPP Inspection-Items: NMED Request Descriptions - Names of all individuals in the following positions: Hazardous Waste Workers, TRU Mixed Waste Handlers, Facility Shift Engineers, Facility Shift Mangers, Central Monitoring Room Operators, Radiographers (Level 1 and 2) Visual Examination Experts (Level 1 and 2), and Permittee's Management Representative. Provide 5% of the names to verify training and qualification are current.

We have also requested these records by phone on several occasions, most recently on Friday, August 31, 2012, but have not received them. We are anxiously awaiting this documentation so that we can complete our inspection. Also, please note that the June 26th email sent by staff was not reviewed or approved by management and should not be considered a solution.

As I am sure you know, Permit Condition 1.7.8. - Duty to Provide Information reads:

"The Permittees shall furnish to the Secretary, within a reasonable time frame as specified by the Secretary, any relevant information which the Secretary may request to determine whether cause exists for modifying, suspending, or revoking this Permit, or to determine compliance with this Permit. The Permittees shall also furnish to the Secretary, upon request, copies of records required to be kept by this Permit. Information and records requested by the Secretary pursuant to this condition shall be provided in a paper or an electronic format acceptable to the Secretary. [20.4.1.500 and .900 NMAC (incorporating 40 CFR §§264.74(a) and 270.30(h))]"

NMED understands that there has been concern regarding disclosure of email addresses or other information that may be covered by the Privacy Act of 1974 and suggests that DOE/WTS redact what information is necessary to comply with those laws but at the same time provide records as required by the WIPP permit.

Please provide the requested files by COB September 7, 2012. Electronic format is adequate.

Trais Kliphuis
WIPP Staff Manager



Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive E, Building 1
Santa Fe, New Mexico 87505

Office: 505-476-6051

Fax: 505-476-6060

Front Desk: 505-476-6000