



FW: Timeline for Ak-21 at SRS

Maestas, Ricardo, NMENV

Sent: Wednesday, December 19, 2012 3:04 PM

To: Allen, Pam, NMENV

Cc: Kliphuis, Trais, NMENV

Attachments: SR-221H-PuOx timeline Rev 1.docx (15 KB)

Email and attachment for December WIPP file

From: Morgan, Thomas - DOE [mailto:Thomas.Morgan@wipp.ws]

Sent: Wednesday, December 19, 2012 2:38 PM

To: Maestas, Ricardo, NMENV; Kliphuis, Trais, NMENV

Cc: Fesmire, Courtland - DOE

Subject: Timeline for Ak-21 at SRS

I asked SRS to insert additional information to help your understanding of the process. This looks like it covers what we explained on the phone. Please call if you have any questions.

Tom Morgan

Department of Energy Carlsbad Field Office

National Transuranic Program CCP Manager

CBFO desk 575 234 7462

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SR-221H-PuOx

- June 26, 2012 – First WSPF approved for AK-21,
- June 29, 2012 – SRS notified CCP that an error was discovered in the Hazardous Waste Determination for the DE3013 campaign:
SRS Environmental Compliance Authority (ECA) identified an incorrect assumption was made during a previous calculation concerning the SR-221H-PuOx Waste Stream. The HBL down blend process was to take an individual DE3013 “can” into a glovebox; blend the Pu oxide with inert material; weigh out individual batches and load into POCs. The H Area ECA thought that the down blending process was accomplished by mixing all of the first campaign DE3013 “cans” with the down blend material in a mixer and then weighing out batches of blended material into the POCs. This understanding was used to determine whether the initial Pu Blend Down material met the definition of hazardous waste. Since the initial campaign of DE3013 “cans” to be down blended contained insignificant quantities of RCRA reportable metals, the resultant determination appeared correct and the process flaw was not caught by the independent reviewer. The same method was then employed by the H Area ECA to the second campaign of material. Some of the individual cans contained RCRA significant quantities, but when taken collectively using the flawed process understanding, resulted in an incorrect determination. During the independent review, the SWM ECA noticed the higher metals content of the individual DE3013 cans and identified the calculation (blending process) error. Once questioned, the calculation was corrected and CCP was notified. (CCP notified CBFO of the issue with waste stream)
 - CCP removes POCs from WDS (renders containers unshippable)
- July 10, 2012 – CBFO rescinded waste stream SR-221H-PuOx
- August 3, 2012 – CBFO issued new waste stream profile for waste stream SR-221H-PuOx
 - CCP adds containers back into WDS
- August 16, 2012 – Shipped first shipment of SR-221H-PuOx