

FW: PMR Agreements from Discussions with NMED

Maestas, Ricardo, NMENV

Sent: Thursday, June 13, 2013 7:14 AM

To: Allen, Pam, NMENV

Attachments: PMR Agreements from Discu~1.docx (17 KB)



WIPP file

From: Miehls, Dennis - DOE [mailto:Dennis.Miehls@wipp.ws]

Sent: Friday, May 17, 2013 1:44 PM

To: Kliphuis, Trais, NMENV

Cc: Navarrete, Martin - DOE; Harvill, Joe - CTAC; Maestas, Ricardo, NMENV

Subject: FW: PMR Agreements from Discussions with NMED

Hi Trais,

Please take a look at the revised draft that we spoke about this morning. As we discussed, in respect to the C-6 checklists this may be a less cumbersome way for us to accurately document our audit activities and for your review as well. Also, some additional language was included in this draft regarding generator sites where characterization and certification activities have been suspended. Please contact me or Martin if you have any questions. Have a good weekend.

Thanks again--Dennis

130528



The following is a summary of a conference call held on April 17, 2013 with members of your staff and personnel from the Department of Energy Carlsbad Field Office (CBFO), the Nuclear Waste Partnership – Central Characterization Program (NWP/CCP), the Advanced Mixed Waste Treatment Project (AMWTP), and the CBFO Technical Assistance Contractor (CTAC). Additional clarifications received during a call on May 15 have also been incorporated. Both calls were to discuss the New Mexico Environment Department (NMED) expectations regarding the recent modifications to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) regarding the implementation of those modifications by the waste generator sites (i.e., CCP and AMWTP), and the performance of subsequent recertification audits (by CBFO and CTAC).

As a result, the following clarifications were reached to ensure continued compliance with recent changes to the WIPP HWFP in the areas of headspace gas sampling, and chemical sampling and analysis.

The NMED expressed that they expect the waste generator sites to complete the Batch Data Reports (BDRs) initiated for chemical sampling and analysis activities prior to March 13, 2013. Examples of these activities include completion of sample collection activities including associated BDRs through project level validation and verification (Project Level Validation and Verification [PL V&V]) and completion of sample analysis activities including completed BDRs through PL V&V for analyses that commenced prior to March 13, 2013. With regard to the completion of sampling and analysis lots, the CBFO understands that only those containers that have been selected for sampling and analysis will be completed if sampling and analysis activities were initiated prior to March 13, 2013. There is no expectation of completing the sample lots since chemical sampling and analysis are no longer required.

Also, CBFO and NMED expect that waste characterization activities and generated data are evaluated for compliance with the requirements in effect at the time. The generator site recertification audits will therefore use the Waste Analysis Plan C-6 Checklists based on the period being audited. Through April 12, 2013 (March 13, 2013 plus 30 calendar days), the previous C-6 Checklists (those from the Hazardous Waste Facility Permit [HWFP] dated May 8, 2012) will be used for headspace gas sampling, and chemical sampling and analysis. The C-6 Checklists from the HWFP (dated March 13, 2013) will be used for the other areas to be reviewed (i.e., real time radiography, visual examination, etc.).

In addition, to minimize the amount of paper generated and maintain consistency in the documentation of generator site activities, the C-6 checklist documentation for generator sites where characterization and certification activities have been suspended will be minimized. CBFO does not expect a need to include the entire C-6 checklist, but will be limiting the submittal to only the respective cover sheet for each area of review. The cover sheet will include an annotation that no characterization or certification activity has been performed at this generator site since the last certification or recertification audit. There will be no objective evidence package provided, and no current copy of procedures.

The CBFO believes these expectations expressed by the NMED are consistent with the revised HWFP and will promote a unified understanding of the requirements for future recertification audits. Should you have any questions or comments regarding these agreements, please contact Mr. Martin Navarrete of my staff at 575-234-7483.