

2/21/14

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NMED
Hazardous Waste Bureau

EPA

The primary interest is understanding the evidence and reasoning that DOE has used to determine that WIPP continues to meet the dose limits to the public set by 40 CFR 191, Subpart A, Environmental Standards for Management and Storage, and that there is no risk to the public.

Has DOE conducted consequence assessment dose projections of the incident, as described by procedure WP 12-ER4916? What are the results of consequence assessment dose projections?

Please provide data (both initial count rates and radiochemical analyses) from the Station A, Skid 3 filter that indicates how much material, if any, was exhausted from the facility prior to the switch to HEPA filtration.

Please provide data (both initial count rates and radiochemical analyses) from the Station B filters, which indicates how much material, if any, was exhausted from the HEPA filter banks.

Please provide a timeline of the incident, which includes the status of underground ventilation at each point in time, and the locations of any mobile air monitors. [Expand to read? Please provide a timeline of the incident, which includes the status of underground ventilation at each point in time, and the locations of any mobile air monitors. The timeline should start at the point when the mine ventilation system was restarted after the mine fire of February 5th.]

Please provide information on the material at risk, including the container numbers and waste stream information.

Please provide a diagram of the underground ventilation configuration at the time of the incident, including location of Panel 7 CAM.

NMED Questions

- 1) Is CBFO following a DOE emergency response plan that is found in a federal regulation (such as 10 CFR 830, *Nuclear Safety Management*), permit or authorization? If so, provide citation.
- 2) If there are no superceding regulations, did CBFO implement the RCRA Hazardous Waste Facility Permit Contingency Plan, Attachment D? What is the current status with regards to implementation of the Contingency Plan?
- 3) What are the primary hazardous waste constituents that are likely to be involved? Please include all waste streams emplaced in Panel 6 Room 1 and Panel 7 Rooms 6 and 7.
- 4) Provide a complete description of the filtration building, including number of stages, number of HEPAs in each stage, and the number of fans. The EIS states an overall decontamination factor of 10E6. What is the estimated highest radionuclide concentration at Station A immediately before switching to filtration mode (also, what is the upper detection limit of the Station A monitor)?

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- 5) How long did it take for the ventilation to completely switch to filtration mode (seconds or minutes from the exact time of CAM alarm)? Is there a record providing timing to filtration mode?
- 6) NMED would like to review the air dispersion modeling currently being performed by DOE which is understood to estimate contamination plume concentrations.
- 7) Provide meteorological data from Feb. 5 to the present for the WIPP area.
- 8) In the Permit, Attachment A2, Section A2-2(a)3 defines six possible modes of operation for the ventilation system. State the mode at time of incident and all information related to mode switching since the incident.
- 9) Were any other ventilation modes of operation used in response to the incident?
- 10) Provide a timeline of underground activities and personnel since the Feb 5 fire. Include all entries to the underground by emergency response teams, and indicate on the timeline when, where, and the status of any samples were taken from the underground for analysis.
- 11) Provide data from all tested analytical samples taken since Feb. 5. This includes samples of air, water, and soil.
- 12) Provide waste volumes, container types, and number of containers in Rooms 6 and 7 of Panel 7, and Room 1 of Panel 6.
- 13) Identify the waste streams and generator site(s) associated with the Rooms listed in (11) above.
- 14) Provide the exact location of the CAM alarm that triggered automatic filtration mode on Feb. 14.
- 15) Provide a map of all radiological monitors that pertain to the WIPP facility.
- 16) Provide data that rules out seismic activity as a cause for the release.
- 17) Provide list of and status of RCRA permit requirements that are interrupted because of this event.
- 18) What is the current status of ventilation operation (flow rate, etc)?