ENTERED

Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Thursday, June 26, 2014 8:02 AM
To: Allen, Pam, NMENV
Subject: FW: WIPP Information - For Call Today
Attachments: Waste Venting Requirements.docx; 41-b-857 WHT dp Daily Averages_3-18-14.pdf; 41-b-856 WHT dp Daily Averages_3-18-14.pdf; NWP QSL - WCS.PNG; WCS Letter Contract Direction (1).pdf; WCS Letter Contract Direction (2).pdf; NWP evaluation of WCS - Mar 2014.pdf; Re-Entry and Resumption Plan 27 feb 14.pdf

March

From: Kliphuis, Trais, NMENV
Sent: Wednesday, March 19, 2014 1:59 PM
To: Flynn, Ryan, NMENV; Kendall, Jeff, NMENV
Cc: Winchester, Jim, NMENV; Tongate, Butch, NMENV; Blaine, Tom, NMENV; Schwender, Erika, NMENV; Skibitski, Thomas, NMENV; LucasKamat, Susan, NMENV; Kieling, John, NMENV; Maestas, Ricardo, NMENV; Holmes, Steve, NMENV; Nelson, Morgan, NMENV; Smith, Coleman, NMENV; Ines Triay (triayin@fiu.edu)
Subject: FW: WIPP Information - For Call Today

NMED comments/additions in blue.

From: Oba Vincent [mailto:oba.vincent@cbfo.doe.gov]
Sent: Wednesday, March 19, 2014 12:30 PM
To: Kliphuis, Trais, NMENV; 'peake.tom@epa.gov'; 'Edwards, Jonathan'; 'Walsh, Jonathan'; 'Perrin, Alan'; 'Bob.Kehrman@wipp.ws'; 'Rick.Chavez@wipp.ws'; 'Stone.Nick@epa.gov'; Smith, Coleman, NMENV; 'brozowski.george@epa.gov'; 'Fraass, Ron'; 'Russell Hardy'
Cc: George Basabilvazo - WIPPNet; 'Reynolds, Tammy - NWP (Tammy.Reynolds@wipp.ws)'; 'Pace, Berry (Berry.Pace@wipp.ws)'; 'Alton.Harris@em.doe.gov'; Susan McCauslin; 'Joe Harvill (jharvill@portageinc.com)'; 'Kennedy, Scott - NWP (Scott.Kennedy@wipp.ws)'; 'Jones, Stewart - RES'; 'Berta Oates'; 'schultheisz.daniel@epa.gov'; Philip Theisen - ORISE; 'Dale Bignell'
Subject: WIPP Information - For Call Today

Attached are the tables for the station A and B data, information regarding the audit of WCS, the WCS Contract, the draft re-entry workplan and graphs showing the performance of the filtration system.

Below is a summary of the discussion points for today: (Please note, activities and dates are subject to change. Please verify the most current dates of any information provided).

- Explanation of attachments
- A vacuum break is being installed in the exhaust duct (between the two dampers); work has been delayed because of Fire accident report and DNFB letter (ESS- Evaluation of Safety of Situation) - work will be initiated on Friday and continue through the weekend.
- Station A and B Sampling: Work is beginning on installing the CAM at Station B today. Will take a few days to install but will not be put on-line for a week or two (allowing for some operational run-time).
- SS and AIS Shaft/Rope Inspections: All preventive maintenance has been completed on the hoist support systems. Entry has been delayed while safety controls are being implemented. Now expected for Sunday/Monday.
- Initial Manned Re-entry of U/G: After SS and AIS inspections above are completed, personnel will enter the mine and survey the area between the SS and AIS. This entry is expected to occur on Monday.

- Dry run at Mosaic Potash Mine to prepare for the entry is occurring today. [in full gear]
- After the area between the shafts is surveyed, a team will enter the mine, perform initial characterization and attempt to identify the contamination source and location. Entry is expected early next week.
- The in-service aerosol test on the HEPA filters is tentatively scheduled for Sunday – to be done on "off shift".
- The first TRUPACT 3 unloading has been delayed until Thursday.
- The press release for the WCS contract is on-hold until the Secretary Moniz talks to the Governor. Tentatively 6:30 PM eastern time today...

Actions from previous meetings will be discussed during the call:

- The coordinates for Station A and B are as follows: Station A – 32.371621, -103.791727 and Station B – 32.372154, -103.791562
- The VOC summary for the waste handling area will be posted on the web.

List of waste by WT that can and cannot go to WCS – must meet WCS and WIPP WACs going through process - nanocuries per container for WCS – and are evaluating those now. Shipments won't go out until April. Will have list by next Wednesday.

Seismic data question –instruments on or not? One on surface and one UG – both were on. When event comes through it changes from 0 to 1 or 1 to zero and indicates that there were not changes of state. NM Tech system is a different system. They were functional but the transmission system was down so their data was not transmitted, logged or recorded.

WCS and compliance with the RCRA permit: Farok: They will follow procedures and will follow WAC and certification processes in Waste Data System (WDS). They will ship in accordance with all shipping transportation requirements. Will be manifested from shippx site – and will be profiled in accordance with WAC. Each shipment will be entered in WCS and, list next week will have drums indicating < 1% and RCRA empty per WCS requirement. Will comply with WCS permit. Upon arriving inspected and received with their permit, will have security plan that assure government waste at commercial facility (security is OUO and will be in plan), inspections also assure nothing will get tampered with or misplaced. They will follow requirements about WSPF, etc. Use WDS to ensure all requirements will be met. Trais asked for letter stating all this for the record - showing how this is in compliance with RCRA permit. They said they would make this an action item and would get this to NMED as well as post the letter on their website – possibly with an attached fact sheet.

Nick Stone – EPA wants assurance of comprehensive monitoring before re-entry as material may get re-entrained, EPA is being pressured to install EPA monitors even if duplicative but EPA doesn't have money for this but this may still happen,

Cole - If ventilation changes during re-entry and recovery and there is a need more air, how will this be met? - HEPA will be maintained and there will be no change in ventilation. At initial entry air will be at backs therefore, very little contamination. Once they get pictures and idea of what happened then they may have to revisit. e.g. running diesel with HEPA won't work...

John Walsh (EPA) is paying a lot of attention to offsite dose (40 CFR 191 Subpart A and Subpart H). If trigger of $1/100^{th}$ is met then sampling/monitoring is required... is this correct and what is being done? Rob: Already accomplished in Consequence Assessment – modeling and offsite assessment.

As a reminder, the call-in number is (866) 723-6758, code 8040901#

Thanks

Oba

Waste Venting, Storage and Shipping Requirements

The purpose of this document is to describe the remedial activities to meet the needs of the WIPP Site for venting, storage and shipping requirements for TRU Mixed Waste currently stored on the surface, either in the PAU or within the Waste Handling Building.

In order to meet these requirements, this process will be performed in two phases.

- Phase I will describe the associated requirements for WIPP to meet the NRC venting requirements for the Type B Packages currently stored in the PAU.

PAU Status			
Shipment #	Package Type/Number	Container Type	NRC 60 Vent Date & Time
SR314012	TP-III # 4	SLB2	3-27-14 @ 1048
SR314013	TP-III # 6	SLB2	3-28-14 @ 1040
SR314014	TP-III # 1	SLB2	3-30-14 @ 1030
SR140005	TP-II # 135 TP-II # 155 TP-II # 160	14 PK 55-Gallon Drums 14 PK 55-gallon Drums 14 PK 55-gallon Drums	3-31-14 @ 1234 3-31-14 @ 1229 3-31-14 @ 1223
IN140042	TP-II # 132 TP-II # 136 HP # 515	SWBs SWBs SWB	4-1-14 @ 1155 4-1-14 @ 1150 4-1-14 @ 1145
IN140043	TP-II # 163 HP # 501	SWBs SWB	4-1-14 @ 1135 4-1-14 @ 1140
IN140044	HP # 512	7 PK 55-gallon Drums	4-3-14 @ 0149
IN140045	HP # 508	SWB	4-3-14 @ 0148

Waste Venting, Storage and Shipping Requirements

- Phase II will describe the associated requirements for WIPP to meet the storage requirements within the Waste Handling Building and the off-site shipment of waste stored within the Waste Handling Building.

Potential Pallet Configuration				
# of Pallets	Pallet #	Current Payload Configuration	Pallet #	New Payload Configuration
1	W	14PK / TDOP	W	14PK / TDOP
2	BB	14PK / SWB	BB	14PK / SWBs
3	X	14PK / SWB	X	14PK / TDOP
4	K	SWBs / SWB	K	SWBs / SWBs
5	D	TDOP / TDOP	D	TDOP / TDOP
6	Y	SLB2	Y	SLB2
7	U	SWB	U	SLB2
8	A	TDOP / SWB	A	SLB2
9	M	TDOP / TDOP	M	TDOP / TDOP
10	Z	14PK / 14PK	Z	14PK / 14PK
11	EE	SWBs / SWB	EE	SWBs / SWBs
12	L	SWBs / SWBs	L	SWBs / SWBs
13	DD	SWBs / SWB	DD	SWBs / SWBs

Potential Surge Pallets				
1		SLB2		
2		TP 181 / TP 202		
3		TP 142 / TP 167		
4		TP 135 / TP 155		
5		TP 160 / HP 512 and 515		

Packages left in the DOCK			
NW Dock	TP – 163 (IN140043) Lids off	NE Dock	TP – 136 (IN140042) Lids off
SW Dock	TP – 132 (IN140042) Lids off	SE Dock	HP – 508 (IN140045 Lids off

Phase I

Scope:
The Scope of Phase I is to identify the Prerequisite requirements and activities that need to be in place to support the NRC 60 day venting requirements of the Type B Packages in the PAU. Additionally, Phase I will describe the sequence of activities to unload the waste from the Type B Packages and place into storage within the Waste Handling Building.

Prerequisite Activities

A) Place all applicable battery operated equipment on charge (Complete)
B) Perform USQ on the use of the Surge Area and full waste capacity in the CH Bay
    a. Calculate waste capacity on container volume versus pallet equivalents
C) Determine the PM status on all needed equipment
    a. Tennelec programming by the vendor
    b. Two FTV batteries need to be de-sulfated
    c. One YTV battery needs to be de-sulfated
    d. HVAC PMs
D) Schedule Maintenance for performance of PMs (if required)
    a. Electrical Craft
    b. Waste Handling support
E) Determine operating support personnel (Complete, one operating position)
    a. Waste Handling
    b. Radiological Control
F) Determine operating schedule (7/10s or 9/80s) (schedule assumes 7/10s)
G) Define schedule/time required to meet NRC venting requirements
H) CBFO notification to NMED for use of Surge Area
I) Re-call of Waste Handling personnel for equipment proficiency operations

NOTE: Although the WIPP Site *is not in normal operations*, Phase I remedial activities to meet the NRC 60 day vent requirements will be performed using *normal operating procedures* for waste processing. Procedures to be used are the associated pre-operational procedures, and WP05-WH1011, CH Waste Processing and WP05-WH1015, Preparation of CH Packaging for Empty Shipment for waste processing.

Waste Venting, Storage and Shipping Requirements
Phase I

Sequence of Activities for Processing

Date	Activity
3-10-14	Perform USQ for Surge Area use (maximum CH Bay capacity)
3-10-14 Thru 3-14-16	De-sulfating of FTV and YTV batteries HVAC PMs Tennelec Programming by vendor WH equipment mechanical/electrical PMs
3-10-14	Identified and notify required WH personnel for return to site
3-10-14	Identify and notify required Maintenance personnel for return to site
3-17-14	**CBFO decision to process all waste in the PAU and store in the CH Bay** • CBFO notify NMED for use of CH Bay Surge Area and provide justification for its use as required by HWFP Attachment A1-1c(1) • CBFO notify NWP with direction to process TRU waste Packages in the PAU and store waste in the CH Bay and utilization of Surge Area **Waste Handling/Radiological Control** • Determine Watch-Bill for staffing
3-12-14 Thru 3-18-14	WH personnel proficiency on equipment operations
3-19-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Relocate empty TP-III # 3 in Room 108 to the PAU • Initiate waste processing on TP-III # 4 (SR314012) • Re-stack payload assemblies as required on facility pallets to optimize CH Bay capacity • Submit documentation for Facility Mode change to Waste Storage Mode
3-20-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete waste processing for TP-III # 4 (SR314012) • Submit documentation for Facility Mode change to Waste Storage Mode

Waste Venting, Storage and Shipping Requirements
Phase I

Date	Activity
3-21-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete empty shipment on T-III # 4 (SR314012) • Relocate TP-III # 4 to the PAU • Initiate waste processing and empty shipment for TP-III # 6 (SR314013) • Submit documentation for Facility Mode change to Waste Storage Mode
3-22-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete waste processing for TP-III # 6 (SR314013) • Submit documentation for Facility Mode change to Waste Storage Mode
3-23-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete empty shipment for TP-III # 6 (SR314013) • Relocate TP-III # 6 to the PAU • Initiate waste processing and empty shipment for TP-III # 1 (SR314014) • Submit documentation for Facility Mode change to Waste Storage Mode
3-24-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete waste processing for TP-III # 1 (SR314014) • Submit documentation for Facility Mode change to Waste Storage Mode

Waste Venting, Storage and Shipping Requirements
Phase I

Date	Activity
3-25-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete empty shipment for TP-III # 1 (SR314014) • Relocate TP-III # 1 to the PAU • Complete processing and empty shipment of one of the four TPs in the docks (IN140044 TPs 181) • Relocate TP 181 to the PAU • Submit documentation for Facility Mode change to Waste Storage Mode
3-26-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete processing and empty shipment of the three remaining TPs in the docks (IN140044 TPs 202 and IN140045 TP 142 and 167) • Relocate TPs 202, 142and 167 to the PAU • Submit documentation for Facility Mode change to Waste Storage Mode
3-27-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete processing and empty shipment of two additional TPs (SR140005 TPs 135 and 155) • Relocate TPs 135 and 155 to the PAU • Submit documentation for Facility Mode change to Waste Storage Mode

Waste Venting, Storage and Shipping Requirements
Phase I

Date	Activity
3-28-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete processing and empty shipment of two additional TPs (SR140005 TP 160 and IN140045 HP 501) • Relocate TPs 160 and HP 501 to the PAU • Submit documentation for Facility Mode change to Waste Storage Mode
3-29-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Complete processing and empty shipment of two additional HPs (IN140044 HP 512 and IN140042 515) • Note: HP 512 is being processed out of sequence to support upcoming Annual Maintenance • Complete surveys for EPD release on HP 512 • Relocate HP 512 and HP 515 to the PAU • Submit documentation for Facility Mode change to Waste Storage Mode
3-30-14	**Waste Handling/Radiological Control/Facility Operations** • Perform pre-job and site status briefing • Perform area inspections, equipment pre-ops and mode compliance checks • Submit documentation for Facility Mode change to Waste Handling Mode **Waste Handling/Radiological Control** • Perform processing to remove ICV and OCV lids to meet vent requirements (IN140043 TP 163, IN140042 136 and TP 132 and IN140045 HP 508) • Submit documentation for Facility Mode change to Waste Storage Mode

Phase II

Scope:
The Scope of Phase II is to identify the associated requirements for WIPP to meet the storage requirements within the Waste Handling Building and the sequence of activities for off-site shipment of waste stored within the Waste Handling Building.

Prerequisite Activities

A) Submit written proposal to NMED outlining alternative storage options as required by the Administrative Order
B) Determine and revise WIPP operating procedures as required for loading waste into Type B packages
C) Determine applicable use of DOE/WIPP 02-3184 for loading waste into Type B packages
D) Develop and issue AJHAs to address the hazard identification and mitigation for the use of DOE/WIPP 02-3184
E) CBFO obtain approval for off-site shipment of waste from WIPP to the designated storage location (e.g. SRS, INL or WCS)
F) Determine sequence of loading activities
G) Determine leak testing equipment capabilities at WIPP or the need for off-site equipment from MLU
H) Determine leak testing support personnel
I) Determine leak testing procedural usage on the WIPP Site (e.g. WIPP procedure, MLU procedure or DOE/WIPP 02-3184 procedure)
J) Obtain Argon gas for leak testing
K) Determination if waste assemblies will be returned as venting equilibrium is reached, or if shipments will be campaigned after all waste assemblies have reached equilibrium
L) Transportation determine which trailers and packages will be used for waste shipments
M) Transportation notification/coordinate with state of NM for return shipments
N) Transportation notification/coordinate with all other states on travel route for return shipments
O) Contact/coordinate NM State Police for CVSA Point of Origin Inspections
P) Contact/coordinate Carrier for CVSA Point of Origin Inspections
Q) Transportation ensure Carriers have Highway Routing Plans (SRS shipments)

Waste Venting, Storage and Shipping Requirements
Phase II

Sequence of Activities for Processing

Date	Activity
3-31-14	Determine applicable use of DOE/WIPP 02-3184 for loading waste into Type B packages
4-1-14 Thru 4-16-14	Determine and revise WIPP operating procedures as required for loading waste into Type B packages
4-15-14	Determine leak testing equipment capabilities at WIPP or the need for off-site equipment from MLU
4-15-14	Determine leak testing support personnel
4-15-14	Determine leak testing procedural usage on the WIPP Site (e.g. WIPP procedure, MLU procedure or DOE/WIPP 02-3184 procedure)
4-15-14	Obtain Argon gas for leak testing
4-15-14	Develop and issue AJHAs to address the hazard identification and mitigation for the use of DOE/WIPP 02-3184
5-6-14	Submit written proposal to NMED outlining alternative storage options as required by the Administrative Order
	CBFO obtain approval for off-site shipment of waste from WIPP to the designated storage location (e.g. SRS, INL or WCS)
	Transportation determine trailers and packages to be used for waste shipments
2 Days 1ST Shipment (IN)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load TDOP into TP-II 166 (Controlled) • Load TDOP into TP-II 168 (Controlled) • Load SWBs into TP-II 210 • MLU personnel perform leak testing • WH load TP-IIs 166, 168 and 210 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (IN shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (IN shipment) • Complete WP08-NT3111 attachments (IN shipments) • Radiological Control perform release surveys • Release IN shipment

Waste Venting, Storage and Shipping Requirements
Phase II

Date	Activity
2 Days 2nd Shipment (IN)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load TDOP into TP-II 186 (Controlled) • Load TDOP into TP-II 208 (Controlled) • Load SWB into HP-505 • MLU personnel perform leak testing • WH load TP-IIs 186, 208 and HP-505 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (IN shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (IN shipment) • Complete WP08-NT3111 attachments (IN shipments) • Radiological Control perform release surveys • Release IN shipment
2 Days 3rd Shipment (IN)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load TDOP into TP-II 125 (Controlled) • Load TDOP into TP-II 203 (Controlled) • Load SWB into HP-509 • MLU personnel perform leak testing • WH load TP-IIs 125, 203 and HP-509 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (IN shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (IN shipment) • Complete WP08-NT3111 attachments (IN shipments) • Radiological Control perform release surveys • Release IN shipment

Date	Activity
2 Days 4th Shipment (IN)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load TDOP into TP-II 181 (Controlled) • Load TDOP into TP-II 202 (Controlled) • Load SWBs into TP-II 191 • MLU personnel perform leak testing • WH load TP-IIs 181, 202 and TP-191 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (IN shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (IN shipment) • Complete WP08-NT3111 attachments (IN shipments) • Radiological Control perform release surveys • Release IN shipment
2 Days 5th Shipment (IN)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load TDOP into TP-II 142 (Controlled) • Load TDOP into TP-II 167 (Controlled) • MLU personnel perform leak testing • WH load TP-IIs 142 and 167 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (IN shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (IN shipment) • Complete WP08-NT3111 attachments (IN shipments) • Radiological Control perform release surveys • Release IN shipment

Waste Venting, Storage and Shipping Requirements
Phase II

Date	Activity
2 Days 6th Shipment (IN)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load 2 7Pks into TP-II 169 • Load 2 7Pks into TP-II 195 • MLU personnel perform leak testing • WH load TP-IIs 169 and 195 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (SR shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (SR shipment) • Complete WP08-NT3111 attachments (SR shipments) • Radiological Control perform release surveys • Release SR shipment
2 Days 7th Shipment (SR)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load 2 7Pks into TP-II 162 • Load 2 7Pks into TP-II 193 • Load 2 7Pks into TP-II 201 • MLU personnel perform leak testing • WH load TP-IIs 162, 193 and 201 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (SR shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (SR shipment) • Complete WP08-NT3111 attachments (SR shipments) • Radiological Control perform release surveys • Release SR shipment

Waste Venting, Storage and Shipping Requirements
Phase II

Date	Activity
2 Days 8th Shipment (SR)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load SLB2 into TP-III 003 • MLU personnel perform leak testing • WH load TP-III 003 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (SR shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (SR shipment) • Complete WP08-NT3111 attachments (SR shipments) • Radiological Control perform release surveys • Release SR shipment
5-26-14 Thru 5-27-14 9th Shipment (SR)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load SLB2 into TP-III 004 • MLU personnel perform leak testing • WH load TP-III 004 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (SR shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (SR shipment) • Complete WP08-NT3111 attachments (SR shipments) • Radiological Control perform release surveys • Release SR shipment

Waste Venting, Storage and Shipping Requirements
Phase II

Date	Activity
5-28-14 Thru 5-29-14 10TH Shipment (SR)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load SLB2 into TP-III 006 • MLU personnel perform leak testing • WH load TP-III 006 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (SR shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (SR shipment) • Complete WP08-NT3111 attachments (SR shipments) • Radiological Control perform release surveys • Release SR shipment
5-30-14 Thru 5-31-14 11TH Shipment (SR)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load SLB2 into TP-III 001 • MLU personnel perform leak testing • WH load TP-III 001 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (SR shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (SR shipment) • Complete WP08-NT3111 attachments (SR shipments) • Radiological Control perform release surveys • Release SR shipment

Waste Venting, Storage and Shipping Requirements
Phase II

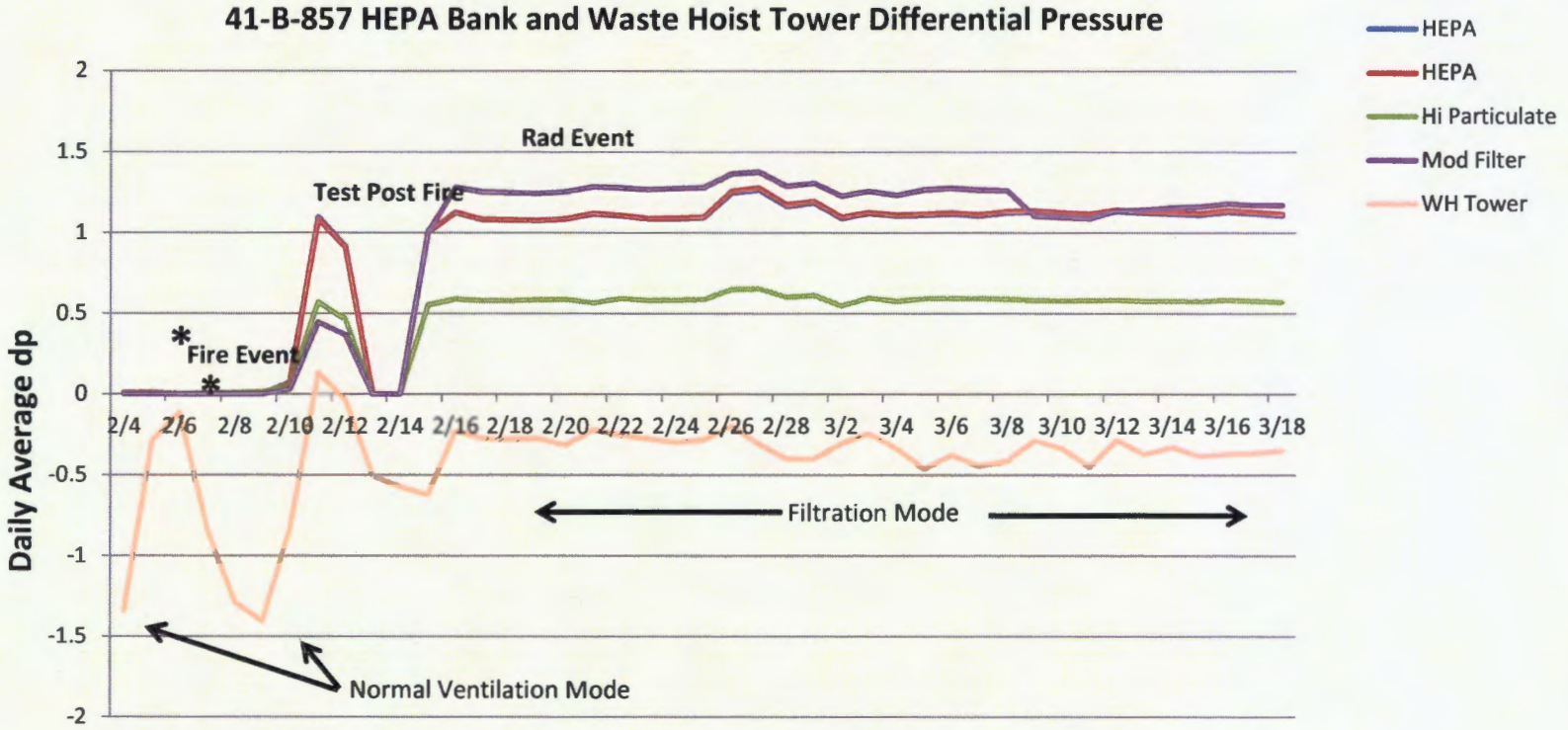
Date	Activity
6-1-14 Thru 6-2-14 12th Shipment (SR)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load 2 7Pks into TP-II 135 • Load 2 7Pks into TP-II 155 • Load 2 7Pks into TP-II 160 • MLU personnel perform leak testing • WH load TP-IIs 135, 155 and 160 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (SR shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (SR shipment) • Complete WP08-NT3111 attachments (SR shipments) • Radiological Control perform release surveys • Release SR shipment
6-3-14 Thru 6-4-14 13th Shipment (IN)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load 2 SWBs into TP-II 132 • Load 2 SWBs into TP-II 136 • Load 1 SWB into HP-515 • MLU personnel perform leak testing • WH load TP-IIs 132, 136 and HP-515 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (IN shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (IN shipment) • Complete WP08-NT3111 attachments (IN shipments) • Radiological Control perform release surveys • Release IN shipment

Waste Venting, Storage and Shipping Requirements
Phase II

Date	Activity
6-5-14 Thru 6-6-14 14th Shipment (IN)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load 2 SWBs into TP-II 163 • Load 2 SWBs into TP-II ??? (these are from HP-501 and 508) • Load 1 7Pk into HP-512 • MLU personnel perform leak testing • WH load TP-IIs 163, ??? and HP-512 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (IN shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (IN shipment) • Complete WP08-NT3111 attachments (IN shipments) • Radiological Control perform release surveys • Release IN shipment
6-7-14 Thru 6-8-14 15th Shipment (LA)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load 2 SWBs into TP-II 172 • Load 2 SWBs into TP-II 127 • MLU personnel perform leak testing • WH load TP-IIs 172 and 127 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (LA shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (LA shipment) • Complete WP08-NT3111 attachments (LA shipments) • Radiological Control perform release surveys • Release LA shipment

Waste Venting, Storage and Shipping Requirements
Phase II

Date	Activity
6-9-14 Thru 6-10-14 16th Shipment (LA)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load 2 SWBs into TP-II 126 • Load 2 SWBs into TP-II 156 • Load 2 SWBs into TP-II 190 • MLU personnel perform leak testing • WH load TP-IIs 126, 156, and 190 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (LA shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (LA shipment) • Complete WP08-NT3111 attachments (LA shipments) • Radiological Control perform release surveys • Release LA shipment
6-11-14 Thru 6-12-14 17th Shipment (LA)	Transportation • Prepare trailer load sheets • Prepare Uniform Hazardous Waste Manifest • Prepare Bill of Lading • Schedule Carriers for return shipments • Coordinate transfer information into WDS for return shipments with MLU Waste Handling • Obtain trailer load sheets from Transportation • Perform pre-job and site status briefing • Load 2 SWBs into TP-II 133 • Load 2 SWBs into TP-II 137 • Load 2 SWBs into TP-II 147 • MLU personnel perform leak testing • WH load TP-IIs 133, 137 and 147 onto trailer ?? Transportation • Coordinate NM State Police for CVSA Point of Origin Inspections (LA shipment) • Coordinate Carrier for CVSA Point of Origin Inspections (LA shipment) • Complete WP08-NT3111 attachments (LA shipments) • Radiological Control perform release surveys • Release LA shipment



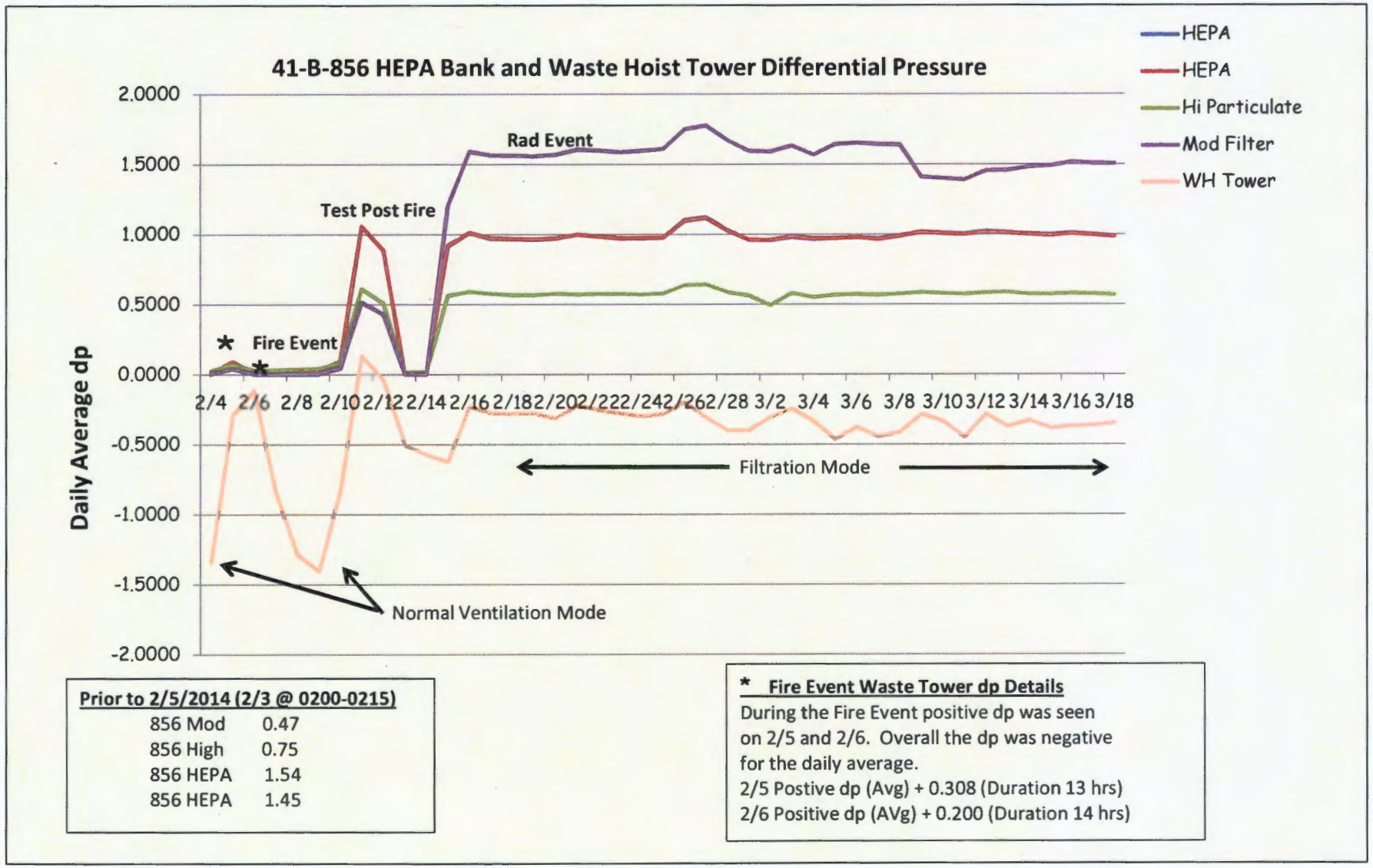
Prior to 2/5/2014 (2/3 @ 0200-0215)	
857	Mod 0.45
857	High 0.75
857	HEPA 1.52
857	HEPA 1.45

*** Fire Event Waste Tower dp Details**

During the Fire Event positive dp was seen on 2/5 and 2/6. Overall the dp was negative for the daily average.

2/5 Postive dp (Avg) + 0.308 (Duration 13 hrs)

2/6 Positive dp (AVg) + 0.200 (Duration 14 hrs)



Prior to 2/5/2014 (2/3 @ 0200-0215)

856 Mod	0.47
856 High	0.75
856 HEPA	1.54
856 HEPA	1.45

*** Fire Event Waste Tower dp Details**

During the Fire Event positive dp was seen on 2/5 and 2/6. Overall the dp was negative for the daily average.

2/5 Postive dp (Avg) + 0.308 (Duration 13 hrs)

2/6 Positive dp (AVg) + 0.200 (Duration 14 hrs)

Qualified Suppliers List

< Select type to sort / filter by

< Leave blank for full listing. Click Submit

Submit < Click to execute request.

FR71 Part-	TSDF	Basis for Qual	Basis for Qual Date	Expiration Date	Product	Status	Last Eval Date	QA Progra
	Yes	FACILITY AUDIT E14-02	3/17/2014	3/31/2015	RECEIVE AND TEMPORARILY STORE SPECIFIC TRU WASTE POPULATIONS THAT ARE CURRENTLY CERTIFIED FOR DISPOSAL AT THE WIPP FACILITY; RADIOLOGICAL CONTROL SERVICES; CRANE OPERATION/RIGGING SERVICES; WASTE HANDLING/FORKLIFT SERVICES	ACTIVE	3/17/2014	TEXAS COMMISSIC ENVIRONME QUALITY (T HAZARDOU WASTE PER

NWP
Nuclear Waste Partnership LLC

A URS-led partnership with B&W and AREVA

CO:14:02630
UFC:4250.00

March 17, 2014

Mr. Rod Baltzer, President
Waste Control Specialists LLC
9998 West State Highway 176
Andrews TX 79714

Subject: AWARD OF LETTER SUBCONTRACT NUMBER 502773 TO WASTE CONTROL SPECIALISTS LLC FOR RECEIPT AND TEMPORARY STORAGE OF TRANSURANIC WASTE UNDER NUCLEAR WASTE PARTNERSHIP LLC PRIME CONTRACT DE-EM0001971

Dear Mr. Baltzer:

This letter is submitted to notify your firm of the subject subcontract award and provides authorization to proceed with all work described in Request for Proposal (RFP) No. 502773.

This letter subcontract, in the maximum not-to-exceed amount of $500,000, for a period of performance to commence April 1, 2014, is necessitated by the urgent need to commence shipments on April 1. A fixed-price/firm-fixed-unit subcontract type is contemplated. Upon Department of Energy Carlsbad Field Office (CBFO) approval, a formal subcontract will be issued.

Please indicate acceptance by signing in the designated area herein and returning it to Marty.Gonzales@wipp.ws, no later than 2:00 p.m. Mountain Time today. By signing below, Waste Control Specialists LLC (WCS) agrees to finalize negotiations with Nuclear Waste Partnership LLC (NWP) regarding the terms and conditions of a definitive subcontract that will include the following, in each case with changes as negotiated by NWP and WCS:

- NWP's Statement of Work for Receipt and Temporary Storage of Transuranic Waste at Waste Control Specialists (WCS), dated March 5, 2014, Revision 0;
- NWP's General Terms and Conditions for Commercial Items (CI 10/12 Rev. 0);
- WCS' standard Environmental Services Agreement.

The schedule for definitizing this subcontract is eight (8) calendar days from the date of this letter. The term of this letter subcontract is through April 30, 2014 and may be extended pending final consent to award by CBFO of a formal subcontract. Award of a formal subcontract shall supersede this letter subcontract and shall include the funding and period of performance included in this letter subcontract.

The following information is relevant to award of this letter subcontract and contributes to the conditions under which it is issued:

1. WCS is a commercial provider of this service.
2. WCS is registered in the System for Award management and no active exclusions prevent award of a subcontract, including a letter subcontract, to WCS.

If you have any questions or need additional information, please contact Ms. M. P. (Marty) Gonzales at 575-234-7291.

Sincerely,

M. A. Edwards C.P.M.
Manager, Procurement Services

MPG

Waste Control Specialists LLC

Rod Baltzer
President

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
March 15, 2014

Mr. Mark Edwards
Manager, Procurement Services
Nuclear Waste Partnership, LLC
P. O. Box 2078
Carlsbad, NM 88220

RE: Contract DE-EM0001971, Nuclear Waste Partnership, LLC – Advance Notification and Consent to Award a Subcontract with Waste Control Specialists LLC for Storage of Transuranic Waste per NWP Letter CO:14:02627, Dated March 10, 2014

Dear Mr. Edwards:

The Carlsbad Field Office (CBFO) and the Environmental Management Consolidated Business Center have completed the review of the documents submitted in the consent package to award a subcontract with Waste Control Specialists, LLC (WCS). Nuclear Waste Partnership is provided conditional approval to enter into a letter subcontract with WCS subject to availability of funds. The letter subcontract shall have a schedule for definitization within 30 days. The ceiling for the letter subcontract action is approved at $8M with a term not to exceed twelve months, pending finalization and CBFO review of the definitized subcontract.

NWP shall submit the definitized WCS subcontract to CBFO for review prior to execution. The conditional approval provides NWP sufficient time to resolve any outstanding issues, complete assessments, respond to reviewers' comments, and to complete the subcontract package.

If you have any questions, please contact me at (575)234-7452.

Sincerely,

Vicki Diane Snow

Vicki Diane Snow
Contracting Officer

Enclosure

cc w/enc:

J. Franco, CBFO	*ED	M. Roy, EMCBC	ED
D. Bryson, CBFO	ED	D. Hess, EMCBC	ED
G. Hellstrom, CBFO	ED	L. Parsons, EMCBC	ED
W. Mackie, CBFO	ED	B. Jones, EMCBC	ED
J.R. Stroble, CBFO	ED	R. Gifford, NWP	ED
J. Rhoades, CBFO	ED	M. Gonzales, NWP	ED

*Electronic distribution

CBFO:OOB:VDS 14-0707:UFC:4250.00

NWP
Nuclear Waste Partnership LLC

A URS-led partnership with B&W and AREVA

QA:14:00045
UFC:2300.00

March 17, 2014

Jeff Shouse, Director of Quality Assurance
Waste Control Specialists LLC
P.O. Box 1129
Andrews, TX 79714

SUBJECT: TRANSMITTAL AND CLOSURE OF NUCLEAR WASTE PARTNERSHIP LLC AUDIT E14-02, WASTE CONTROL SPECIALISTS LLC

Dear Mr. J. Shouse:

Nuclear Waste Partnership LLC (NWP) Quality Assurance (QA) conducted Audit E14-02, *Waste Control Specialists LLC (WCS)* on March 11, 2014, at your Andrews, Texas, facility. The purpose of this audit was to evaluate the adequacy, implementation and effectiveness of the WCS QA Program, for compliance with select requirements of the WCS *Quality Assurance Plan*, and the Statement of Work, for the Receipt and Temporary Storage of TRU Waste at WCS.

The scope also included personnel interviews, observations of processes, documentation reviews, and evaluation of associated plans and procedures, in order to determine the implementation and effectiveness of the WCS QA Program.

The audit concluded that an adequate and effective Quality Assurance Program is being maintained and that the established and relevant processes, procedures and practices are being satisfactorily implemented.

This audit resulted in no findings, no conditions corrected during the assessment, and no observations. Therefore, this audit is considered closed with the issuance of this report and WCS LLC will be added to the Qualified Supplier's List.

If you have any questions or need further information regarding this audit, please contact Mr. Pete Rodriguez at (575) 234- 8233.

Sincerely,

J. E. Hoff

J. E. Hoff, Manager
Quality Assurance

PVR:ses

Attachment

Nuclear Waste Partnership, LLC
Quality Assurance External Audit Report
Waste Control Specialists LLC (WCP)
Audit Number E14-02

I. EXECUTIVE SUMMARY:

Nuclear Waste Partnership LLC (NWP) Quality Assurance (QA) Audit E14-02, *of Waste Control Specialists LLC (WCS)*, was performed on March 11, 2014. Audit activities were performed at the WCS facility in Andrews County, Texas.

This audit was conducted to evaluate the WCS Quality Assurance Program and its ability to meet proposed Statement of Work (SOW) and select quality requirements. The proposed SOW entails the receipt and temporary storage of transuranic (TRU) waste at permitted and licensed WCS storage facility.

The adequacy, implementation and effectiveness of the WCS, QA program was found to be compliant with their established Quality Assurance Plan and the WIPP Procedure (WP) 13-1, NWP LLC *Quality Assurance Program Description*, as well as select WCS implementing procedural requirements.

The scope included an evaluation of the Organization, QA Program, Instructions, Procedures and Drawings; Document Control; Identification and Control of Materials, Parts and Components; Inspection; Handling, Storage and Shipping; Nonconformance control; corrective actions; QA Records, Audits, Surveillances and Assessments. The processes for inventory control measures to be implemented by WCS, as well as proposed storage areas were also discussed, observed and evaluated.

No adverse conditions were noted during the audit and WCS is qualified for placement on the NWP Qualified Suppliers List (QSL).

II. AUDIT DETAILS:

Purpose and Scope:

The purpose of this audit was to evaluate the adequacy, implementation and effectiveness of the WCS QA program for compliance with the WCS Quality Assurance Plan (QAP-100 Revision 2, 6/3/13), and the WIPP Procedure (WP) 13-1, NWP LLC *Quality Assurance Program Description*. Associated upper-tier and applicable implementing procedural requirements were also evaluated for consideration and placement of WCS on the NWP QSL.

The scope included an evaluation of the Organization, QA Program, Instructions, Procedures and Drawings; Document Control; Identification and Control of Materials, Parts and Components; Inspection; Handling, Storage and Shipping; Nonconformance control; corrective actions; QA Records, Audits, Surveillances and Assessments. The processes for inventory control measures to be implemented by WCS, as well as proposed storage areas were also discussed, observed and evaluated.

The approach to this audit included observations of processes, documentation reviews, personnel interviews, and evaluations of associated plans and procedures relevant to the Statement of Work SOW, for the Receipt and Temporary Storage of TRU Waste at WCS.

The checklist used during the audit was based on the NQA-1, 1989 basic requirements as applicable to the proposed SOW.

Criteria Used:

- WP 13-1, Rev. 34, *NWP Quality Assurance Program Description*
- WP 13-QA.03, Rev. 22, *NWP Quality Assurance Independent Assessment Program*
- WP 13-QA3012, Rev. 21, NWP Supplier Evaluation/Qualification
- WCS QA-100, Rev. 2, *Quality Assurance Plan*, and associated implementing procedures

Audit Team:

Lead Auditor:
Mr. P. V. Rodriguez, NWP, QA

Auditors:
Mr. W. Ledford, NWP, QA

Inclusive Dates of Audit:

March 11, 2014

Location of Audit:

Waste Control Specialists LLC (WCS)
P.O. Box 1129
9998 West State Highway 176
Andrews, TX 79714

Safety and Security:

The supplier indicated and provided protective headgear/(hardhats), reflective safety vests; as required in certain facility and container storage areas. The NWP Audit Team complied with all personal protective equipment requirements and instructions during the conduct of this audit.

Conclusions:

- Organizational charts and interfaces are satisfactorily established to show the relationships and responsibilities for WCS personnel.
- Existing and applicable WCS procedures and processes (including the QA Plan) will be utilized for the WIPP waste handling, inventory and interim storage as described in the proposed SOW.
- The following NQA-1 basic requirements/elements were deemed to be not applicable or relevant to the SOW: Design Control, Procurement Document Control, Control of Purchased Items and Services; Control of Special Processes; and Test Control.
- Appropriate personnel training and qualification records were verified for: Heavy Equipment Operation; Practical Operations (i.e., Forklift, Dram Grapple, Mobile Crane and et. al.); and Environmental and Compliance Inspection.
- Inventory control processes, including daily and weekly inspections and container inventory reports were determined satisfactory and sufficient for the control of WIPP waste containers
- Instructions, procedures and document control processes were examined, evaluated and verified as being satisfactorily compliant with procedural requirements
- The nonconformance and corrective action processes as described in the procedure describing the Action/Issue Management System (AIMS), was examined and evaluated. The AIMS database and review of several open and closed issues - evidenced satisfactory compliance to the established requirements.
- QA Records controls processes satisfactorily established and implemented. Processes included but are not limited to an Electronic Records Management System (ERMS), establishment of departmental satellite records, et. al. measures for the preparation, receipt and safe storage of quality assurance records.
- Security arrangements for access to the proposed storage areas include key card access to the WCS property, background checks of all personnel provided key card access, and motion sensors/security cameras in the proposed storage areas.

The audit results allow NWP's approval of WCS to provide interim TRU waste storage, in accordance with SOW.

This audit resulted in no findings or observations.

Response(s) to Findings:

N/A

FINDINGS:

None

CONDITIONS CORRECTED DURING THE AUDIT (CDAs):

None

OBSERVATION(S):

None

III. ATTACHMENTS:

Attachment 1, *Table of Personnel Contacted*
Attachment 2, *Table of Documents Reviewed*

IV. SIGNATURES:

Prepared by: _____ 3/17/14
Pete V. Rodriguez, Lead Auditor — Date
Oversight Programs

Approved by: _____ 3/17/14
V. K. Cannon, Manager — Date
Assurance Programs

Attachment 1, *Table of Personnel Contacted*

[A] Attended Audit Entrance Meeting
[B] Contacted During the Audit
[C] Attended Audit Exit Meeting

Personnel Contacted	A	B	C
WCS			
J. Britten	X		X
M. Burney			X
J. Cartwright			X
D. Frenette	X		X
K. Page-Gonzalez	X	X	X
D. Henderson			X
R. Murdock		X	
S. Parker		X	X
J. Shouse	X	X	X
K. Vazquez	X	X	X
T. Ward	X	X	X
W. Williams	X	X	X
Susan Van Leuvan		X	
NWP/CTAC/DOE			
W. Ledford, NWP	X	X	X
P. Martinez, CTAC	X	X	X
D. Miehls, DOE	X	X	X
P. Rodriguez, NWP	X	X	X

Attachment 2, *Table of Documents Reviewed*

Document Identification	Document Title or Description
WP 13-1, Rev. 34, 10/9/13	*NWP Quality Assurance Program Description*
WP 13-QA.03, Rev. 22, 5/22/13	*NWP Quality Assurance Independent Assessment*
WP 13-QA3012, Rev. 21, 2/4/14	*NWP Supplier Evaluation/Qualification*
WCS QA-100, Rev. 2, 6/3/13	Quality Assurance Plan, and associated implementing procedures
WCS HS-2.11.1, Rev. 3, 12/20/10	*Crane Safety Program*
WCS HS-2.32.1 Rev. 3, 7/29/10	*Forklifts/Power Industrial Trucks*
WCS MA-1.1.1 Rev. 4, 10/6/12	*Pre-Start Inspection Checklist for the Crane (MA-1.1.1-5) and Pre-Start Inspection Checkl9ist for the Forklift (MA-1.1.1-9)*
WCS OP-1.2.29, Rev. 6, 11/14/13	*Waste Acceptance for Treatment. Storage and Disposal*
WCS QA-2.2, Rev. 2, 6/3/13	*QA Program Management Review*
WCS QA-5.1, Rev. 2, 6/3/13	*Standard Operating Procedures and Work Instructions*
WCS QA-6.1, Rev. 2, 6/3/13	*Document Control*
WCS QA-8.1, Rev. 0, 6/3/13	*Identification and Control of Quality-Affecting Items*
WCS QA-10.1, Rev. 2, 6/3/13	*Inspections*
WCS QA-12.1, Rev. 2, 6/3/13	*Control of Measuring and Testing Equipment*
WCS QA-13.1, Rev. 0, 6/3/13	*Handling, Storage, and Shipping*
WCS QA 16.1, Rev. 2, 6/3/13	*Corrective Action Management*
WCS QA-17.1, Rev. 2, 6/3/13	*Quality Assurance Records*
WCS QA-18.1, Rev. 2, 6/3/13	*Audits*
WCS QA-18.3, Rev. 1, 6/3/13	*Management Assessments*
WCS QA-18.4, Rev. 1, 6/3/13	*Surveillance*
WCS OP-1.1.21, Rev. 5, 6/19/12	*Material Control and Accountability (Electronic Waste Tracking System)*
WCS RS-3.1.1, Rev. 5, 3/6/12	*Operation of Portable Survey Instruments*
WCS RS-3.3.9, Rev. 2, 1/3/11	*Operation and Calibration of the Canberra Tennelec Series 5 Counter*
WCS QA-7.1-1	*SQF Supplier Qualification Form; Ludlum Measurements, Inc.; for: calibration and instrument repairs of ionizing radiation detection instrumentation; 12/19/11*
WCS Supplier Requalification Evaluation Report; American Crane Company	*1/6/14 reports, including: SQF, QA-7.1-1, and American Crane Company, personnel certifications et. al. training correspondence*
WCS 2013 Audit Report	*2013 Audit report: WCS Radiation Safety Program WCS Radiological Environmental Monitoring Program; Sept. 30 – Oct. 2, 2013*
WCS 2014 QA Internal Audit Schedule	*2014 QA Internal Audit Schedule – approved by the Director of Quality Assurance 1/6/14*
WCS 2014 QA Surveillance Target Schedule	*2014 QA Surveillance Target Schedule - approved by the Director of Quality Assurance 1/6/14*
WCS 2013 QA Program Management Review Report	*2013 QA Program management Review Report – dated 12/12/13; documents WCS annual management review and direction by the WCS President, including review team selection*

Document Identification	Document Title or Description
WCS Controlled Document Index	*Controlled Document Index dated 3/7/14*
WCS Organization Chart	*Organizational Chart(s); Compilation dated: 3/3/14*
WCS Training Document PC Print-outs	*Course Completion Listing, 10/3/13 – Heavy Equipment Operation; Coarse Retraining, 29 page listing of Operations, i.e., Forklift Operation and Practical Training, Mobile Crane and etc., 2/7/14; and Environmental and Compliance inspection personnel listing; generated: 3/11/14*
WCS Environmental and Compliance Weekly Inspection	*WCS Weekly Inspection Forms, 2/12/14; includes inspections for: East & West Landfill-TCEQ P.U. #2; Stabilization Building – TCEQ P.U. #8 (RCRA) and (MWTF), et. al., as required by the various permit and agency mandates.*
WCS Environmental and Compliance Weekly Inspection	*WCS Weekly Inspection Forms, 2/5/14; includes inspections for: East & West Landfill-TCEQ P.U. #2; Stabilization Building – TCEQ P.U. #8 (RCRA) and (MWTF), et. al., as required by the various permit and agency mandates.*
WCS Environmental and Compliance Weekly Inspection	*WCS Weekly Inspection Forms, 2/19/14; includes inspections for: East & West Landfill-TCEQ P.U. #2; Stabilization Building – TCEQ P.U. #8 (RCRA) and (MWTF), et. al., as required by the various permit and agency mandates.*
WCS Weekly Container Inventory	*WO#: 6721; Weekly Container Inventory CSB/BSA/90 Day; 2/14/14*
WCS Weekly Container Inventory	*WO#: 6846; Weekly Container Inventory CSB/BSA/90 Day; 2/28/14*

NWP
Nuclear Waste Partnership LLC

A URS-led partnership with B&W and AREVA

CO:14:02915
UFC:2200.00

February 26, 2014

Ms. Vicki Diane Snow, Contracting Officer
Office of Business
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221-3090

Subject: SUBMITTAL OF RE-ENTRY AND RESUMPTION PLAN UNDER PRIME CONTRACT DE-EM0001971

Reference: DOE Memorandum CBFO:OOB:VDS:HL:14-0656:UFC 4250.00 from Vicki Diane Snow to Mr. M. F. Sharif, dated February 20, 2014, subject: Contract DE-EM0001971, Nuclear Waste Partnership, LLC – Contracting Officer Direction for Employee Plan for Non-Essential Personnel and Initial Re-Entry and Resumption Plan and Approval of Salary Continuation for Non-Essential Personnel February 20-28, 2014, per NWP Letter AA:14:01026

Dear Ms. Snow:

In accordance with the above referenced letter, requesting a re-entry and resumption plan, attached is Nuclear Waste Partnership LLC's (NWP's) Integrated Recovery Plan, Revision 0, dated February 25, 2014, including milestones, schedules, and development and implementation of a full recovery plan.

Also attached is a Level One Schedule to accompany the Plan. A Level Three Schedule will be provided to CBFO electronically today.

If you have any questions or would like to request further information regarding this submittal, please contact Mr. Farok Sharif at Extension 7400.

Sincerely,

M. P. Gonzales, Manager
Contracts

MPG:skc

Attachments (2)

cc: D. Bryson, CBFO
J. Franco, CBFO

P.O. Box 2078 • Carlsbad, New Mexico USA 88221-2078
Phone: (575) 234-7200 • Fax: (575) 234-7083

bcc: NWP Distribution

R. M. Gifford	ED
P. J. Hester	ED
T. R. Reynolds	ED
M. F. Sharif	ED

Waste Isolation Pilot Plant (WIPP)
Haul Truck Fire and Radiological Release Events

Integrated Recovery Plan

Executive Summary

This document describes the actions that the US Department of Energy (DOE) Carlsbad Field Office (CBFO) and the Nuclear Waste Partnership (NWP) have taken and will take at the DOE's Waste Isolation Pilot Plant (WIPP) to integrate recovery efforts from the underground salt haul truck fire and radiological release events and restore WIPP back to transuranic (TRU) waste disposal operations.

The document is divided into seven sections:

1. **Purpose and scope of the plan**
2. **Background**
3. **Event investigation and root cause determination**
4. **Integrated recovery plan objectives**
5. **Key recovery strategies**
6. **Re-entry and recovery**
7. **Planning for resumption of operations**

The objectives of the recovery plan are:

- Protect worker and public health and the environment at all times during the recovery—it is the top priority of the DOE and the NWP and is the essential component of all recovery actions
- Using approved Integrated Safety Management System (ISMS) processes, identify and mitigate the hazards, including mine and radiological safety
- Terminate the low-level release of radioactive material from the underground ventilation exhaust
- Identify the source of the radiological event in the underground and isolate/mitigate the release
- Replace the moderate and high efficiency filters in the underground ventilation exhaust system and remediate any other contamination on the surface
- Identify the root cause of the two events and perform actions to prevent event recurrence
- Utilize WIPP's highly skilled and knowledgeable workforce to the maximum extent practical, recognizing that retaining their unique skills and knowledge are critical for re-entry, recovery, and resumption of waste disposal operations
- Organize and fully utilize the expertise/resources available from the Department, the NWP parent companies, national laboratories, and others to assist NWP to ensure a safe and timely recovery
- Throughout the recovery, ensure effective and transparent communication, involvement, and collaboration with stakeholders, municipalities, and regulators
- Resume waste disposal operations in a safe, systematic manner following completion of corrective actions

Key strategies covered in the document include:

- **Re-entry**
  - Use of Salt Hoist for re-entry with the Air Intake Hoist as the secondary means of egress
  - Unmanned instrumented entry to establish safe habitability before manned entry
  - Manned entry to characterize air quality conditions and mine stability, attempt to identify the cause of the release, and stabilize the incident scene to the extent possible

- **Recovery**
  - Take actions to terminate the low-level release of radioactive material from the underground exhaust
  - Isolation/ mitigation of the activity source in the underground
  - Replace underground exhaust filter bank elements as necessary to support restored operations

- **Workforce protection and usage**
  - Limiting site access to essential personnel during re-entry and mitigation activities that could open fugitive underground exhaust pathways
  - Temporarily assigning some personnel to other key activities

- **Expertise/resource usage**
  - Deploy best-in-class resources from both federal and contractor sectors to recovery efforts

- **Communication**
  - Be proactive and timely in communication to stakeholders and regulators

- **Resumption of operations**
  - Proactive examination of scenarios and options for resuming operations as emergent information unfolds

1.0 Purpose and scope of plan

This document describes the actions that the US Department of Energy (DOE) Carlsbad Field Office (CBFO) and the Nuclear Waste Partnership (NWP) have taken and will take at the DOE's Waste Isolation Pilot Plant (WIPP) to integrate recovery efforts from the underground salt haul truck fire and radiological release events and restore WIPP back to transuranic (TRU) waste disposal operations.

These actions include those initially taken in response to each event, those that will be taken to assure safe re-entry, what is planned during re-entry, and what actions must be completed as part of recovery in preparation to return to operation. This plan is expected to change as a result of knowledge gained from preceding actions. As major strategies change, this plan will be updated.

This is a planning document only. All field activities will be performed using approved WIPP program documents, procedures, and work control processes.

2.0 Background

2.1 WIPP overview

The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility designed to safely isolate defense-related transuranic waste from people and the environment. Waste temporarily stored at sites around the country is shipped to WIPP and permanently disposed in rooms mined out of an ancient salt formation 2,150 feet below the surface. WIPP, which began waste disposal operations in 1999, is located 26 miles outside of Carlsbad, N.M. The facility is managed and operated for the DOE by Nuclear Waste Partnership, LLC.

2.2 The events

2.2.1 Haul truck fire in the WIPP underground

On February 5, 2014, an underground diesel-powered vehicle used to transport mined salt caught on fire. All underground personnel were evacuated to the surface. Ventilation to the underground was aligned through filtered exhaust and all waste handling operations were suspended. Initial critiques were performed by NWP and DOE deployed an Accident Investigation Board to investigate the event in accordance with DOE Order 225.1B.

2.2.2 Radiological release event

On February 14, 2014, a continuous air monitor detected airborne radioactive contamination in the underground. There were no employees working underground at the time. Per site procedures, site and offsite sampling and monitoring were initiated to characterize the release. Site access was limited to essential personnel only. The source of the airborne radioactive contamination is under investigation.

2.3 Key initial actions to the event

2.3.1 Response to the underground salt haul truck fire

- Evacuated and provided accountability for all personnel
- Treated employees as necessary for smoke inhalation
- Activated Emergency Operations Center (EOC) and the Joint Information Center (JIC) and made notifications
- Held NWP critique to identify issues and initial corrective actions
- Provided onsite Corporate management support for recovery efforts
- Established event War Room for command and control center
- Supported the Accident Investigation Board (AIB) investigation
- Developed Recovery Plans for both Surface and Underground
- Executed three entries with Mine Rescue under approval of MSHA to assess fire and assure it was extinguished
- Once fire confirmed extinguished, terminated EOC
- Executed reentry plans to confirm operability of two hoists for primary and secondary egress/access
- Confirmed air quality and reestablished Continuous Air Monitor (CAM) operability after impacts on CAMs from soot
- Preserved incident scene
- Made various mine entries accompanied by AIB members and advisors
- Began ventilation modeling to understand smoke propagation

2.3.2 Response to the radiological release

- Per site procedure, sheltered in place and performed initial radiological monitoring of site and offsite areas (there were no personnel underground)
- Activated EOC/JIC
- Evacuated non-essential personnel and limited site access to essential personnel
- Assigned all nonessential personnel to offsite duties or placed on standby until radiological conditions stabilized
- Ongoing daily sampling and monitoring to assess offsite consequences, analyze hazards, define onsite radiological controls, and identify the source
- Established whole-body exit monitoring for all site personnel and visitors
- Terminated EOC/JIC once release levels sufficiently lowered and stabilized
- Continued support to AIB now reviewing both events
- Began assembling corporate resources to support recovery

3.0 Event investigation and root cause determination (this section will be completed when the root cause analysis findings are issued)

Root cause identification and analysis
Following the events, formal critiques were performed and immediate corrective actions were initiated (see previous section). A formal Accident Investigation Board (AIB) was appointed by DOE to investigate and determine causal factors for both events. Critical corrective actions will be mandatory prerequisites to future operations or activities.

4.0 Integrated recovery plan objectives

4.1 Protect worker and public health and the environment at all times during the recovery—it is the top priority of the DOE and the NWP and is the essential component of all recovery actions

4.2 Using approved ISMS processes, identify and mitigate the hazards, including mine and radiological safety

4.3 Terminate the low-level release of radioactive material from the underground ventilation exhaust

4.4 Identify the source of the radiological event in the underground and isolate/mitigate the release

4.5 Replace the moderate and high efficiency filters in the underground ventilation exhaust system and remediate any other contamination on the surface

4.6 Identify the root cause of the two events and perform actions to prevent event recurrence

4.7 Utilize WIPP's highly skilled and knowledgeable workforce to the maximum extent practical, recognizing that retaining their unique skills and knowledge are critical for re-entry, recovery, and resumption of waste disposal operations

4.8 Organize and fully utilize the expertise/resources available from the Department, the NWP parent companies, national laboratories, and others to assist NWP to ensure a safe and timely recovery

4.9 Throughout the recovery, ensure effective and transparent communication, involvement, and collaboration with stakeholders, municipalities, and regulators

4.10 Resume waste disposal operations in a safe, systematic manner following completion of corrective actions

5.0 Key Recovery Strategies

5.1 Re-entry

- **Salt Hoist:** the salt hoist will be used as the primary pathway for underground re-entry activities.

- **Air Intake Shaft (AIS) Hoist:** the AIS hoist will be used as the secondary egress path to meet MSHA requirements

- **Unmanned entry:** before sending any personnel into the shaft or the underground, atmospheric monitoring instrumentation will be transported on the conveyance to characterize air quality throughout the shaft and surrounding areas.

- **Manned entry:** data from air monitoring equipment will be used to determine the type of personal protective equipment (PPE) necessary for the manned team. If results are acceptable, the manned team will wear Powered Air Purifying Respirators (PAPRs) with backup batteries and self-contained breathing apparatus (SCBA) in reserve. If the probe finds significant activity, the team will wear SCBAs. PPE will be determined consistent with DOE requirements.

  Once lowered into the underground on the salt hoist, the team will establish a base from which to operate and rest, and establish appropriate communication with the entry team and the Central Monitoring Room (CMR). Armed with equipment for radiation detection, industrial hygiene sampling, communication, and ground control, the team will progress through the mine to the AIS to ensure two modes of egress from the mine; then to the ventilation regulator to configure the controls to Auto for improved ventilation control from the CMR. After ensuring ventilation stability, a separate entry into the mine will progress to the suspect incident areas and attempt to identify the location of the source of the activity, marking off clean and contaminated areas. This effort will focus on Room 7, Panel 7 and Room 1, Panel 6, near where the alarming continuous air monitor (CAM) is located.

  Before manned entry, the ventilation system and filtration system will be verified to be stable and with sufficient margin to support any unplanned releases.

- **Robotics:** the deployment of robotics has been investigated and robots are available if conditions warrant.

5.2 Recovery

- **Isolation/ mitigation of the activity source in the underground** will depend on the instrument readings and visual observations made by the manned team and any subsequent remote or manned surveillance actions. Regardless of the findings, careful and comprehensive work/safety planning and preparation will be performed prior to any source isolation activities.

- **If the source of the activity is in a visible, accessible location**: it may be possible to simply cleanup or containerize/over pack the waste. For example, if a drum has dropped from the stack and the lid has come off or the drum is punctured.

- **If the source of the activity is in an inaccessible location:** such as deep within the rows of drums, it may be necessary to install bulkheads (seal the room off). Note that this strategy would result in the loss of disposal space in the repository.

- **Filter banks** for the repository ventilation/exhaust system are located on the surface. During the radiological event, the filters ventilation system significantly reduced the radiological release as designed. The filters are now contaminated, but the system is stable and functioning. However, planning is underway, parallel with re-entry efforts, for filter replacement due to loading, and to seal leakage pathways.

5.3 Workforce protection and usage

- **Limiting site access to essential personnel during re-entry and mitigation activities**: during salt and AIS hoist movements, filter replacement, and other re-entry and mitigation activities with potential to disturb waste or residual contamination, all non-essential personnel will be restricted from site access and will be assigned to offsite, in-town activities such as training. This will minimize radiological risk to the workforce.

- **Temporarily assigning some personnel to other key activities**: some of the work performed and supported by WIPP personnel stopped when waste disposal operations was suspended. The strategy is to temporarily assign as many personnel as possible to corrective, repair, and improvement work that can be performed at the site and in-town during the shutdown. The unions have agreed to this approach. The advantage of this approach is that key, unique talent will be retained rather than lost to the local booming oil and gas market and a local economy that has only 2% unemployment.

5.4 Expertise/resource usage

- **Organize and deploy best-in-class resources.** CBFO and NWP will use all available federal and corporate resources in recovering from the radiological event. To this end, WIPP will employ/is employing the following in recovering from the radiological event:
  - National Labs
  - DOE headquarters and other sites
  - NWP parent companies

5.5 Communication

- Proactively communicate with stakeholders and regulators through the full set of communication channels
- Utilize lessons learned to continuously improve communications

5.6 Resumption of operations

- **Systematic resumption**: Resumption of waste disposal activates will be performed in a systematic, controlled manner.

6.0 Re-entry and recovery

6.1 Management support activities

- Team of specialists from NWP parent companies (URS, B&W, AREVA) were immediately assigned to WIPP (corporate reachback) with assignments in the following areas:
  - Interface with DOE Office of Environmental Management
  - Re-entry and Recovery Planning/Management
  - Resumption Management
  - Plutonium Management
  - Environmental Monitoring and Radiological Controls
  - Recovery Planning
  - Strategic Planning/Communication/HR
- National Labs—LANL, SRNL, and INL are already assisting in recovery planning efforts. Their expertise and technology will continue to be used throughout the recovery
- DOE headquarters—experts from EM and NNSA are being engaged in a variety of areas including communication and event investigation
- Radiological control technicians and SMEs from SRR, INL, AMWTP, and LANL are providing support
- DNFSB staff are onsite observing recovery efforts
- Expertise from other DOE sites are supporting AIB and recovery activities

6.2 Workforce protection and usage plan

- Actions to return WIPP Non-essential employees to site
  - Regular, ongoing communication with personnel on standby
  - Maximize presentation of required training at off-site locations
  - Define site radiological conditions and post as appropriate
  - Provide necessary personnel monitoring equipment and stations
  - Provide additional monitoring training as necessary to site personnel and visitors
  - Make facility modifications as necessary to ensure airborne pathways are directed through filtered release
  - Complete changes to emergency response procedures identified from event investigations
  - Return employees in stages as needs are determined by Operations management to support required site work activities
  - Remove monitoring requirements when determined appropriate by Radiolgical Controls management
- Limiting site access to essential personnel during initial re-entry and mitigation activities, which present contamination pathways to the underground
- Temporarily assigning some personnel to other key activities

6.3 Communication plan

- Develop a communication plan to ensure all stakeholders and regulators are getting timely, accurate, and consistent progress updates. Stakeholders include site workers, CBFO, DOE-HQ, community leaders, state leaders, media

- Daily Status Report on website
- Regular Status updates to key Regulator and state leaders
- Regular All Hands meetings
- Town Hall Meetings as required
- News release updates for new information

6.4 Environmental monitoring and survey plan

- Off site
  - Initial characterization surveys
    - Following the underground radioactivity release that occurred on 2/14/14, Environmental Monitoring and Radiological Controls personnel performed extensive on-site and off-site surveys to characterize the WIPP site and immediate off-site impact. NWP personnel also performed plume models using NARAC atmospheric modeling codes. The results of on- and off-site initial surveys performed were consistent with model predictions with low levels of radioactivity detected on environmental air samples.
    - Following release detection on 2/14/14, seven perimeter and two blank air samples were pulled on a special basis to characterize the release. In addition, samples of soil (27 samples with 5 control samples), and 7 perimeter water samples with one control sample were obtained. Results will be communicated as received.
  - Ongoing surveys
    - Samples of site perimeter vegetation are being performed to assess off-site vegetation impact. Results will be communicated as received.
    - NWP Environmental Controls has an established environmental monitoring program, as described in the WIPP Environmental Monitoring System Description (DOC/WIPP-05-3318), to include routine monitoring of site emissions, and environmental media analysis to characterize WIPP environmental emissions.
    - The Environmental Controls group will continue to obtain these samples (air, soil, water) on a weekly basis, in accordance with the established site program, and will revert to accident monitoring upon indication of change in conditions.
- On site
  - Initial characterization surveys
    - NWP Radiological Controls has an established radiological habitability program, and has enhanced that program following the release event to ensure the habitability of the site. Radiological Controls personnel have performed extensive surveys following the indication of a release to ensure the site conditions were characterized and understood.

- Routine and release follow-up air sampling on the WIPP site and hundreds of samples from portable and fixed air samples since the release show no detectable contamination.
- Following the event, Radiological Controls personnel have performed over a thousand contamination smears within the WIPP site. Three smears taken under the A-2 skid in the "Station A" exhaust sampling building showed contamination, possibly the result of contamination migration during the sample pull evolution to obtain the initial air sample. All other samples showed no contamination above detectable levels.
- The smears to characterize the site include general site areas, predicted maximum deposition regions from plume models (to include building roofs), and areas of high occupancy.
- Several times the Salt shaft has been reporting as 'upcasting'; each time this condition has been reported, follow-up surveys have been performed of the shaft collar region with no contamination detected. The salt shaft collar region has been covered to minimize potential contamination. In addition, real-time air monitors were provided to detect and alarm any high activity releases.
- Since 2/14/14, Radiological Controls personnel have performed almost 1000 personnel whole body surveys at the WIPP Controlled Area exit, with no process related contamination detected.

o Ongoing surveys

- Following the event, compensatory monitoring was established to ensure the continued habitability of the WIPP Property Protection Area. These surveys include:
  - Air sampling of all mine access shafts
  - Contamination surveys of all mine access shafts (weekly, or as indicated based on air sample results or indications of "upcasting")
  - More frequent changes of station A and B samples
- In addition, the NWP procedure for radiological surveys, WP 12-HP1100, is being revised to reflect the change in radiological conditions, to include:
  - Contamination surveys of high traffic areas and building entrances in the Property Protection Areas (weekly)
  - Contamination surveys of the WIPP main cafeteria (daily)

- Although releases to the environment have not resulted in contamination above 10CFR835 limits on the WIPP site, some potential exists for fugitive release at underground access points. As a result, radiological postings have been established to ensure that access points to the underground are controlled to prevent inadvertent entry. Required exit monitoring requirements are stipulated for these areas, since these areas are established for contamination potential, ensuring underground contamination is contained at the source and does not migrate out of radiological posted areas.

- New Radiological Buffer Area boundaries (along with corresponding controlled areas) have been established for contamination control at all the mine access locations, to include:
  - Air Intake Shaft
  - Salt Shaft
  - Waste Shaft Collar
  - Auxiliary Air Intake Building
  - Building 413 Exhaust Filter Building and surrounding underground exhaust ductwork
- These posting changes implement contamination control measures following the release event. Additional changes are anticipated to accommodate initiation of mine reentry and subsequent recovery activities.

6.5 Regulatory compliance plan

- WIPP is working to obtain an emergency permit from NMED due to the fact that some activities required by the existing permit cannot be performed
- NWP will obtain appropriate formal approvals from DOE for key TSRs that currently cannot be performed because of access restrictions
- WIPP will coordinate with other regulators to address the changed conditions ensuring compliance with applicable regulations, including EPA, MSHA, and NRC

6.6 Re-entry plan

- All reentry activities will be performed using WIPP approved procedures and work control processes. These steps outline some of the key planning activities that will be incorporated
- Prerequisites for entry
  - Ensure compensatory measures for entry identified by the Haul Truck Fire event are met prior to reentry (immediate LL from fire event / information from mine rescue entries)
  - Obtain Pu experienced radiological controls personnel to participate in planning and on each reentry team.
  - Establish re-entry team makeup
  - Train non-site personnel on mine safety.
  - Train reentry personnel on specific hazards associated with Pu
  - Complete dry runs
  - Obtain necessary radiological monitoring equipment (CAMs, retrospective samplers, lapel monitors, isotopics, etc. – battery capability)
  - Obtain Anti-contamination clothing
  - Obtain respiratory protection equipment – PAPR/SCBA
  - Obtain communication equipment for workers, base station, and CMR communication
  - Obtain video equipment
  - Fall Protection
  - Obtain egress monitoring stations/equipment
  - Establish personnel decontamination capability
  - Establish standby mine rescue team

- Establish written re-entry procedure
- Establish RWP
- Establish JHA

- Summary of reentry steps
  - Establish Shaft / Conveyance Habitability
  - Establish Egress Capability & Operating Base
  - Establish CMR control for ventilation system in filtration mode
  - Identify Source Term
  - Source Containment / Confinement if possible
- Conduct reentry
  - Establish Shaft / Conveyance Habitability
    - Survey the above ground AIS conveyance
    - Conduct unmanned AIS shaft air monitoring survey down to 2150 feet as part of pre-op checks of hoist
    - Establish AIS conveyance as safe to transport people and validate proper PPE for conditions
    - Repeat steps above for Salt shaft / conveyance
    - Initiate manned entry to conduct radiological surveys on way down to 2150 feet
  - Establish Egress Capability & Operating Base
    - Survey (air quality, contamination, ground control, etc.) mine between AIS and Salt shafts – establish safe zone and mine operating base at Salt station
  - Establish CMR control for ventilation system in filtration mode
    - Survey from Salt shaft (W30) to S700 to E140 to S400
    - Configure 308 regulator from manual to auto
  - Wait at least 12 hours to adjust monitor and stabilize the ventilation system
  - Identify Source Term
    - Survey and perform ground control checks from SALT shaft (W30) to S1950 to E140 to S2520 (under the exhaust duct/overcast) into Panel 7 (air intake)
    - If needed, survey from E140 to S2750 up to Panel 6 closure barrier.
    - With visual observation and video equipment, to the extent possible, locate and identify the source of the release
  - Source Containment / Confinement if practical
    - Based on results from above, and with additional planning, subsequent entries will be made to implement controls to contain/confine
  - Robotics may be deployed as necessary to further examine source term or aid in containment

6.7 Recovery plan

- Summary of Recovery Plan
  - Purpose of recovery

- Establish conditions that will allow return to Surface and Underground operations

- Strategy
  - The strategy is largely dependent on levels of underground contamination found during re-entry and the physical nature of the source term
  - The recovery plan ends when the mine is ready to support operations

- Recovery Actions
  - Take actions to terminate the low-level release of radioactive material from the underground ventilation exhaust
  - Develop and implement a comprehensive corrective action plan to address the AIB results
  - Evaluate infrastructure modifications, training, and procedure and process changes required from event lessons
  - Establish a training and drill program of abnormal and emergency events
  - Ensure that personnel have radiological equipment necessary to allow for safe evacuation if another failure were to occur
  - Review AOP's and EP's to identify needed changes
  - Enhance training to work in a rad environment
  - Evaluate the Ventilation system to determine need for decontamination, or operational/ design changes

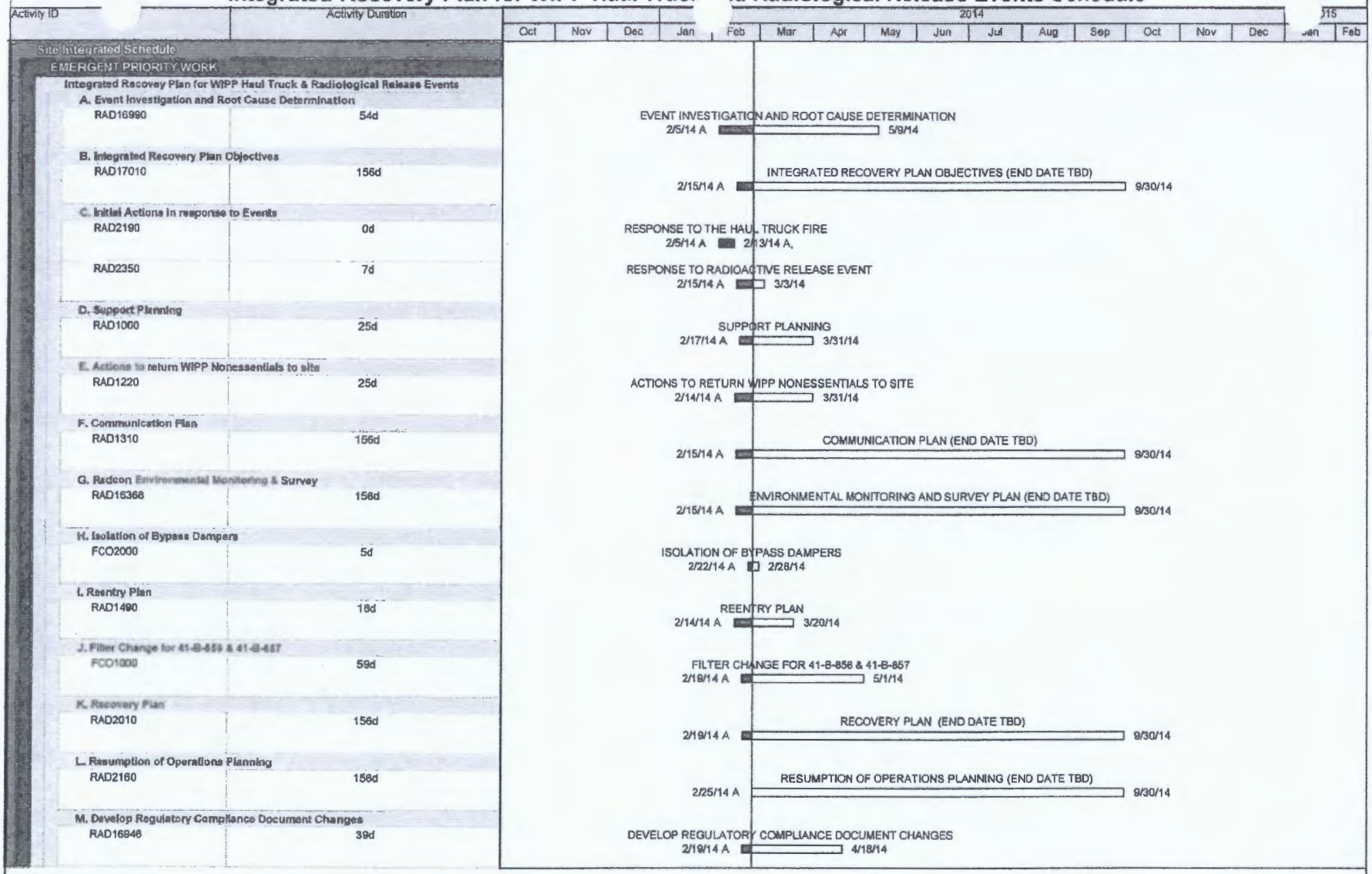
7.0 Planning for resumption of operations

7.1 Establish a joint DOE/contractor working group to consider key systems and processes likely affected by the event; potential long-term impacts to the WIPP facility and the TRU complex; and the range of potential recovery actions.

7.2 Based on results of investigations and impacts of contamination, establish necessary changes to WAC, mine configuration, or operations to support resumption of waste shipments

7.3 Conduct readiness reviews consistent with DOE Order 425.1d prior to resuming operations

Integrated Recovery Plan for WIPP Haul Truck and Radiological Release Events Schedule



Current Bar
Critical Milestone
Milestone
Actual Work
Actual Milestone
Critical Remaining Work

Status as of: 2/25/14

Printout As Of: 2/26/14