



Department of Energy
Carlsbad Field Office
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MAR 21 2014

Mr. Jeffrey M. Kendall
Office of General Counsel and Environmental Policy
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87502-5469

Subject: Response to Information Request, WIPP Permit Section 1.7.8

Reference: NMED Memorandum from Mr. Jeffrey M. Kendall to George Hellstrom, Joe Franco, Dennis Cook, Farok Sharif, dated March 12, 2014, subject: NMED Request for Information, WIPP Permit Section 1.7.8

Dear Mr. Kendall:

In response to your March 12, 2014 request for information, we have not invoked the RCRA Contingency Plan for the February 14, 2014 radiological event at the WIPP facility for the following reasons.

At approximately 11:15 PM Friday February 14, 2014, a Continuous Air Monitor (CAM) detected airborne radiation in the underground indicating a radiological release from waste that had been disposed in an underground hazardous waste disposal unit (HWDU). The WIPP facility ventilation system automatically switched to filtration mode when the airborne radiation was detected underground. No personnel were underground at the time of the event. To date, there has been no re-entry into the underground to determine the cause of the event.

Because of the airborne radiation detected by the CAM in the underground and by radiological monitoring Stations A and B in the exhaust ventilation system at the surface, the event has been managed as a radiological event and appropriate radiological event response procedures were implemented to protect human health and the environment. The Permittees performed chemical analysis of radiological sampling Stations A and B filters from the time of the event. The results indicated that the event is being appropriately managed as a surface radiological event. Additionally, volatile organic compound sampling and industrial hygiene monitoring is ongoing on the surface. The ventilation system will continue operating through HEPA filtration for the indefinite future.

The on-duty Facility Shift Manager (FSM) evaluated the necessity to implement the RCRA Contingency Plan. The FSM determined that the criteria in Permit Attachment D, Section D-3 requiring implementation of RCRA Contingency Plan had not been met. As stated above, this event was considered a radiological event and there is no indication of a release of hazardous waste or hazardous constituents to the surface. Should surface conditions change indicating a release of hazardous waste or hazardous waste constituents, implementation of the RCRA Contingency Plan will be re-evaluated.

The Permittees anticipate re-entry into the underground disposal units in the near future to evaluate the conditions that caused the release. Part of re-entry is to complete a plan for recovery. The Permittees intend to implement the RCRA Contingency Plan after re-entry, but prior to finalization of the recovery plan in order to use the RCRA Contingency Plan during recovery. Upon implementation of the RCRA Contingency Plan the Permittees will notify the NMED and other agencies as appropriate, will provide a follow up report to the NMED within 15 days, provide a sampling plan for NMED's approval in accordance with Permit Attachment D, Section D-4d(10), and upon termination of recovery procedures the Permittees will notify the NMED in accordance with Permit Attachment D, Section D-8.

If you have any questions, please contact Mr. G. T. Basabilvazo at (575) 234-7488.

Sincerely,



George W. Hellstrom, Legal Counsel
U.S. Department of Energy, CBFO



Dennis N. Cook, Legal Counsel
Nuclear Waste Partnership LLC

cc:

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Mr. Jeffrey M. Kendall

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