



Department of Energy
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MAR 28 2014

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NM Environment Department
Office of the Secretary



Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Notification of Class 1 Permit Modification to the Waste Isolation Pilot Plant
Hazardous Waste Facility Permit Number: NM4890139088-TSDF

Dear Mr. Kieling:

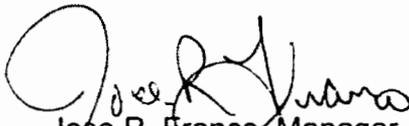
Enclosed is a Class 1 Permit Modification Notification for the following items:

- Update Chronology in Attachment A
- Change Preventative Maintenance Procedure Number in Table E-1a

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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

Sincerely,


Jose R. Franco, Manager
Carlsbad Field Office


Robert L. McQuinn, Project Manager
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure
T. Kliphuis, NMED *ED
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*ED denotes electronic distribution

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Class 1 Permit Modification Notifications

**Update Chronology in Attachment A
Change Preventative Maintenance Procedure Number in Table E-1a**

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

WIPP Permit Number - NM4890139088-TSDF

March 2014

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Transmittal Letter

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Overview of the Permit Modification Notifications

This document contains two Class 1 Permit Modification Notifications (**PMNs**) to modify the Hazardous Waste Facility Permit (**Permit**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Nuclear Waste Partnership LLC, collectively referred to as the Permittees, in accordance with Permit Part 1, Section 1.3.1. (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (**CFR**) §270.42(a)). The PMNs in this document are necessary to notify the New Mexico Environment Department (**NMED**) of changes which impact the Permit. These changes do not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the Permit and any related supporting documents are provided in these PMNs. The proposed modifications to the text of the Permit has been identified using **red** text and **double underline** and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by italicized text.

Attachment A
Description of the Class 1 Permit Modification Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

Item	Affected Permit Section	Change Description	Category
1.	Permit Attachment A, Section A-6	This modification updates Permit Attachment A, Section A-6, to reflect a recent reorganization within URS Corporation applicable to the Management and Operating Contractor (MOC), Nuclear Waste Partnership LLC. Note that there is no change in ownership or operational control of the facility. This is an administrative change to update the Permit. Nuclear Waste Partnership LLC was previously under an organization called URS Energy and Construction and is now in an organization called URS Federal Services Division.	A.1
2.	Permit Attachment E, Table E-1a	This modification changes the Preventative Maintenance Procedure number in Permit Attachment E, Table E-1a, from PM041173 to PM411028.	A.1

Item 1

Description

This modification updates Permit Attachment A, Section A-6, to reflect a recent reorganization within URS Corporation applicable to the Management and Operating Contractor (MOC), Nuclear Waste Partnership LLC. Note that there is no change in ownership or operational control of the facility. This is an administrative change to update the Permit. Nuclear Waste Partnership was previously under an organization called URS Energy and Construction and is now within an organization called URS Federal Services Division.

Basis

The change is simply to update the Permit with current information. It does not reflect a transfer of the Permit, nor a change in ownership of the MOC or operational control pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.40(b)) and does not require a change to the Part A Permit Application. Therefore, this modification is a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, *Appendix I, A.1, Administrative and Informational changes*).

Discussion

URS announced an organizational realignment in February 2014, to become effective on April 1, 2014, to move Global Management and Operational Services Group (GMOS) from URS Energy and Construction Division to URS Federal Services Division. Nuclear Waste Partnership LLC is part of GMOS. This modification changes "URS Energy and Construction" to "URS Federal Services Division" in Permit Attachment A, Section A-6, Chronology of Events Relevant to Changes in Ownership or Operational Control.

Proposed Revised Permit Text

A-6 Chronology of Events Relevant to Changes in Ownership or Operational Control

October 1, 2012 NMED received a Class 1 permit modification requiring prior agency approval in a letter dated June 25, 2012 describing a change in the MOC for the WIPP facility. The new MOC for the WIPP facility will be Nuclear Waste Partnership LLC. The new MOC is comprised of URS Energy and Construction, Inc. and Babcock and Wilcox Technical Services Group, Inc.

April 1, 2014

URS announced an organizational realignment to move Global Management and Operational Services Group (GMOS) from URS Energy and Construction to URS Federal Services Division. Nuclear Waste Partnership LLC is part of GMOS and remains in this group. The MOC is comprised of URS Federal Services, Inc. and Babcock and Wilcox Technical Services Group, Inc.

Item 2

Description

This modification changes the Preventative Maintenance Procedure number in Permit Attachment E, Table E-1a, from PM041173 to PM411028.

Basis

The change is simply to update the Permit with current information regarding the preventative maintenance procedure for a piece of equipment. It does not reflect a decrease in inspection frequency or preventative maintenance activity. Therefore, this modification is a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, *Appendix I, A.1, Administrative and Informational changes*).

Discussion

This change is necessary because the Preventative Maintenance procedure PM041173 for the 6.25-Ton Grapple Hoist has been combined into Preventative Maintenance procedure PM411028. Maintenance originally performed annually by Preventative Maintenance procedure PM041173 is now performed by Preventative Maintenance procedure PM411028. There is no change in frequency or content of the inspection for this piece of equipment.

Proposed Revised Permit Text

**Table E-1a
RH TRU Mixed Waste Inspection Schedule/Procedures**

System/ Equipment Name	Responsible Organization ^j	Inspection ^a Frequency and Job Title of Personnel Normally Making Inspection ^j	Procedure Number (Latest Revision)	Inspection Criteria		
				Deterioration ^b	Leaks/ spills	Other
Cask Transfer Car(s)	Waste Operations	Pre-evolution ^{c,d,e} See List 1	WP05-WH1701 PM041187 (Semi-Annual)	Yes	NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
RH Bay Overhead Bridge Crane	Waste Operations	Preoperational ^{c,d,e,j} See List 1	WP05-WH1741 PM041232 (Quarterly) PM041117 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
Facility Cask	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05-WH1713 PM041201 (Annual) PM041203 (Annual)	Yes	NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical PM.
RH Bay Cask Lifting Yoke	Waste Operations	Preoperational ^{c,d,e,j} See List 1	WP05-WH1741 PM041169 (Annual)	Yes	NA	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
Facility Cask Transfer Car	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05-WH1704 PM041186 (Quarterly) PM041195 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication Electrical Inspection
Facility Cask Rotating Device	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05-WH1713 PM041175 (Annual) PM041176 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication Electrical Inspection
Facility Grapple	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05-WH1721 PM041172 (Quarterly) PM041177 (Annual)	Yes	NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear. Non-Destructive Examination
6.25-Ton Grapple Hoist	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05-WH1721 PM041473 <u>PM411028</u> (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
Transfer Cell Shuttle Car	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05-WH1705 PM041184 (Semi-Annual) PM041222 (Annual)	Yes	Yes	Pre-evolution Pre- operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection.

System/ Equipment Name	Responsible Organization ^J	Inspection ^a Frequency and Job Title of Personnel Normally Making Inspection ^J	Procedure Number (Latest Revision)	Inspection Criteria		
				Deterioration ^b	Leaks/ spills	Other
Cask Unloading Room	Waste Operations	Preoperational ^{c,d,e,f,h,j} See List 1	WP05-WH1744	Yes	NA	Floor integrity
Hot Cell	Waste Operations	Preoperational ^{c,d,e,f,g,h,j} See List 1	WP05-WH1744	Yes	NA	Floor integrity
Hot Cell Overhead Powered Manipulator	Waste Operations	Preoperational ^{c,d,e,j} See List 1	WP05-WH1743 PM041215 (Annual) PM041216 (Annual) IC411037 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration
Hot Cell Bridge Crane	Waste Operations	Preoperational ^{c,d,e,j} See List 1	WP05-WH1742 PM041217 (Annual) PM041209 (Annual) IC411038 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration.
Transfer Cell	Waste Operations	Preoperational ^{c,d,e,f,h,j} See List 1	WP05-WH1744	Yes	NA	Floor integrity
Facility Cask Loading Room	Waste Operations	Preoperational ^{c,d,e,f,h,j} See List 1	WP05-WH1744	Yes	NA	Floor integrity
Closed Circuit Television Camera	Waste Operations	Preoperational ^{c,j} See List 1	WP05-WH1757	NA	NA	Operability
Radiation Monitoring Equipment	Radiation Control	Preoperational ^{c,d,e} See List 2	WP12-HP1245 IC240010 WP12-HP1307 IC240007 WP12-HP1314 (Annual)	Yes	NA	Operability Checks, Functional Checks, Instrument calibrations, Flow Calibration, Efficiency Checks.
Cask Unloading Room Crane	Waste Operations	Preoperational ^{c,d,e,j} See List 1	WP05-WH1719 PM041190 (Quarterly) PM041191 (Annual) PM041192 (Annual) IC411035 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration.

System/ Equipment Name	Responsible Organization ^j	Inspection ^a Frequency and Job Title of Personnel Normally Making Inspection ^j	Procedure Number (Latest Revision)	Inspection Criteria		
				Deterioration ^b	Leaks/ spills	Other
Horizontal Emplacement and Retrieval Equipment or functionally equivalent equipment	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05-WH1700 PM052010 (Semi-Annual) ^k PM052011 (Annual) PM052013 PM052012 PM052014 (Annual)	Yes	Yes	Assembly and Operating Instructions. Electrical Inspection. Position Transducer Calibration. Tilt Sensor Calibration.
41-Ton Forklift	Waste Operations	Preoperational ^{c,d,e,f} See List 1	WP05-WH1602 PM074061 PM052003 (Hours of Use) PM074027 (Quarterly) PM074029 & PM074051 (Annual)	Yes	Yes	Pre-Operational Checks. PM performed every 100 hours of operation, every 500 hours of operation or every 5 Years. Quarterly Engine Emission Test. Annual Electrical Inspection. Annual NDE.
RH Bay	Waste Operations	Preoperational ^{c,d,e,h,i} See List 1	WP05-WH1744	Yes	NA	Floor integrity
Surface RH TRU Mixed Waste Handling Area	Waste Operations	Preoperational ⁱ See List 1	WP- 05 WH1744	Yes	Yes	Posted Warning, Communications