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Hazardous Waste Bureau

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 Underground Monitoring and Inspections During Recovery and Re-entry,  
Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF

Dear Mr. Kieling:

The purpose of this letter is to notify you of some Permit-required activities that cannot be accomplished due to inaccessibility of the Waste Isolation Pilot Plant (WIPP) underground facility due to two recent incidents. Currently, access to the WIPP facility is limited to those personnel essential to investigating the incidents and returning the facility to normal operations. Normal waste handling operations have been suspended, and the underground facility is currently not accessible for operations. It is likely that these required activities cannot be accomplished until further into the recovery process. Because of this, there are certain Permit-required activities that cannot be accomplished because performing them would place workers in jeopardy due to the hazards related to the radiological release. In addition, there are some activities that are not addressed in the Permit that may be required during recovery and re-entry procedures. Permit-related activities affected by the current status of the underground are described below.

Room-Based Volatile Organic Compound (VOC) Monitoring requires access to the Hazardous Waste Disposal Units (HWDUs) in the underground. These activities are required by Permit Part 4, Section 4.4.3, *Ongoing Disposal Room VOC Monitoring in Panels 3 through 8*; and Permit Attachment N; and cannot be accomplished at this time. In addition, future reports required by Permit Part 4 will be impacted due to the inability to perform data collection activities. Note that the semi-annual VOC monitoring and hydrogen methane report for the period July 1, 2013, through December 31, 2013, required by Permit Part 4, Section 4.6.2.2; Permit Attachment N; and Permit Part 4, Section 4.6.5.2, will be complete. However, subsequent reports will not have complete sets of underground monitoring data for the entire reporting period.

Repository VOC Monitoring requires access to sampling locations in the underground. These activities are required by Permit Part 4, Section 4.6.2, *Repository Volatile Organic Compound Monitoring*; and Permit Attachment N; and cannot be accomplished at this time. Note that under the February 28, 2014, Administrative Order, the Permittees are evaluating the use of surface-based VOC sampling to temporarily replace Repository VOC Monitoring. In addition, future reports required by Permit Part 4 will be impacted, as noted above, due to the inability to perform data collection activities.

Disposal Room Monitoring requires access to the HWDUs in the underground. These activities are required by Permit Part 4, Section 4.6.3, *Disposal Room Volatile Organic Compound Monitoring*; and Permit Attachment N; and cannot be accomplished at this time. In addition, future reports required by Permit Part 4 will be impacted, as noted above, due to the inability to perform data collection activities.

Hydrogen and Methane Monitoring requires access to the HWDUs in the underground. These activities are required by Permit Part 4, Section 4.6.5, *Hydrogen and Methane Monitoring*; and Permit Attachment N1; and cannot be accomplished at this time. In addition, future reports required by Permit Part 4 will be impacted, as noted above, due to the inability to perform data collection activities.



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Mr. John E. Kieling

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Geomechanical Monitoring as required by Permit Part 4, Section 4.6.1, *Geomechanical Monitoring*; Permit Attachment A2, Section A2-5b(2), *Geomechanical Monitoring*; and Permit Attachment E, Table E-2, can be performed in part as follows. Remote monitoring is still functional at this time; however, no underground maintenance of associated equipment can be performed should some functionality be lost. In addition, the annual inspection required by Permit Part 4, Section 4.6.1.2, *Reporting Requirements*, to provide the annual certification by a registered professional engineer certifying the stability of explosion-isolation walls, requires access to the HWDUs in the underground and cannot be performed at this time. In addition, reports required by Permit Part 4 will be impacted due to the inability to perform data collection activities.

With regard to the ventilation requirements in Permit Part 4, Section 4.5.3.2, *Ventilation*; Section 4.6.4, *Mine Ventilation Rate Monitoring*; and Permit Attachment O, the minimum running annual average mine ventilation exhaust rate of 260,000 standard cubic feet per minute (scfm) likely cannot be met because the ventilation rate through high efficiency particulate air (HEPA) filtration is approximately 60,000 scfm. In addition, it may not be possible to complete the test and balance of the ventilation system as required by Permit Attachment O due to limited accessibility and ventilation limitations.

Underground Inspections as required by Permit Part 4, Section 4.7, *Inspection Schedules and Procedures*; and Permit Attachment E, Table E-1 and Table E-1a, (inspections are pre-operational; therefore, inspections are not required and because underground equipment is not operating, preventative maintenance is not required) all require access to the underground and cannot be performed at this time.

It is anticipated that derived waste will be generated in the underground as a result of decontamination activities. Underground storage of derived waste is currently not addressed in the Permit. Staging and storage of derived waste prior to emplacement may be required.

The Permittees will provide a schedule identifying when the aforementioned activities will resume when we are further into the recovery process. Once recovery is completed and the facility is ready for normal operations, the New Mexico Environment Department will be notified that the conditions in this letter no longer exist; and routine inspections and monitoring will be resumed.

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 Basabilvazo at 575-234-7488.

Sincerely,

  
Jose R. Franco, Manager  
Carlsbad Field Office

  
Robert L. McQuinn, Project Manager  
Nuclear Waste Partnership LLC

cc:

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