

**Allen, Pam, NMENV**

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**From:** Maestas, Ricardo, NMENV  
**Sent:** Thursday, December 18, 2014 9:29 AM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: initial comments on LANL Plan  
**Attachments:** Carlsbad\_LANL\_List\_Variance\_2014-05-20.xlsx

May

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**From:** Kliphuis, Trais, NMENV  
**Sent:** Thursday, May 22, 2014 5:37 AM  
**To:** Kendall, Jeff, NMENV; Kieling, John, NMENV  
**Cc:** Maestas, Ricardo, NMENV; Holmes, Steve, NMENV; Smith, Coleman, NMENV; Hall, Timothy, NMENV; Briley, Siona, NMENV; Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV  
**Subject:** RE: initial comments on LANL Plan

We finally got access to the ftp site mentioned in the calls! There are 372 documents. Attached is one that is very useful. Note the third tab.

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**From:** Kendall, Jeff, NMENV  
**Sent:** Wednesday, May 21, 2014 7:24 PM  
**To:** Kieling, John, NMENV  
**Cc:** Maestas, Ricardo, NMENV; Kliphuis, Trais, NMENV; Holmes, Steve, NMENV; Smith, Coleman, NMENV; Hall, Timothy, NMENV; Briley, Siona, NMENV; Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV; Hower, Jennifer, NMENV  
**Subject:** RE: initial comments on LANL Plan

All,

Great start on reviewing the LANL submission. John and Trais, please get a hold of me first thing in the morning to discuss. We have received positive feedback for our cautions approach with this suspect waste stream.

Jeff

**Jeffrey M. Kendall**  
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LEGISLATIVE COORDINATOR  
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**From:** Kieling, John, NMENV  
**Sent:** Wednesday, May 21, 2014 5:19 PM  
**To:** Kendall, Jeff, NMENV  
**Cc:** Maestas, Ricardo, NMENV; Kliphuis, Trais, NMENV; Holmes, Steve, NMENV; Smith, Coleman, NMENV; Hall, Timothy, NMENV; Briley, Siona, NMENV; Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV; Hower, Jennifer, NMENV  
**Subject:** initial comments on LANL Plan

Jeff,

Below are the initial comments on the LANL Plan. Some comments may be duplicative at this point as they were compiled from various staff reviewing the Plan. Staff will continue to review the Plan tomorrow.

Thanks, John

#### **HWB Comments on the LANL's Isolation Plan, submitted May 21, 2014**

1. The order states (at 14) that waste stream LA-MHD01-001 contains varying amounts of nitrate salts remediated with cat litter (unsure if Swheat Scoop). This is consistent with the AK. The LANL response does not address MHD01. This stream is in the WHB, emplaced at WIPP, and status unknown at LANL. We need the container-specific information to confirm that MHD01 is not dangerous. Otherwise, this stream should be treated with the same caution as MIN02.
2. Throughout response: the order discusses the four specific waste streams in CCP-AK-LANL-006. All discussions in the response need to state which waste stream(s) will be subject to the Plan.
3. The response at III needs to discuss neutralization steps, reagents used, location of process, and any other specific information related to neutralization.
4. The response at IV(3) state the nitrate-bearing waste will be stored in the Permacons at Domes 231 and 375. Would a Permacon contain a breach with energy similar to the WIPP incident?
5. The response at IV(4) and V(2) state "Action levels will be established and response instructions prepared." Action levels for what parameters?

6. The response at IV (general) and V (general) state numbers of nitrate-bearing waste containers that are remediated and unremediated. These are for waste stream MIN02 only, and don't include the MHD01 waste.
7. The response at V(2) states that the unremediated drums are overpacked into 85 gal containers. Does this process include the neutralization steps? Please list locations(s) where neutralization occurred.
8. The response at IV(4) and V(3) state that the subject containers will be placed "an adequate distance apart". What distance was determined to be adequate by LANL?
9. The Plan does not provide a "detailed description of how DOE and LANS will isolate, secure and/or treat all nitrate salt bearing waste containers currently stored at LANL..." LA-MHD01.001 does not appear to be addressed and cemented legacy and newly generated nitrate salt-bearing wastes are excluded from the Plan.
10. The Plan does not detail the remediation process or the schedule for doing so, but instead refers to a "Remediation Team" that will identify a path forward.
11. The Plan should discuss in more detail the active fire suppression system in Dome 230 and whether the system is compatible with the waste and any byproducts produced in the event a reaction occurs.
12. Part II.- The Plan does not describe how daily temperature measurements being taking of closed containers which are over packed in SWBs with additional tamper seals installed. The plan does not detail how the Permittees are preventing workers from coming in contact with these containers?
13. Part IV.3- The Plan does not detail the distance apart the sister drum and 57 remediated nitrate containers being stored from one another and other containers. The Plan does not describe in detail how did the Permittees determined this distance.
14. Part IV.3- The Plan does not describe Permacons design features and capabilities to contain explosive/heat events. The Plan does not detail how and if other protective shields/barriers be utilized for workers. The Plan does not detail what characteristic (toxicity, reactivity, ignitability, corrosively) mixed TRU waste the Permacons are authorized to treat.
15. Part IV.5.- The description does not state if fire department/emergency responders were present or alerted that the containers when the potentially explosive containers were being transported. The Plan also does not describe if they will be present/alerted during remediation actions.
16. Part IV.5- The Plan states that "where possible fire resistant curtains will be used in lieu of spacing" The Plan does demonstrate the effectiveness of fire resistant curtain; since it does not describe the temperatures these curtains are rated for, and what temperatures the event at Panel 7 reached.
17. Part IV.7- The Plan does not state that the sister drum and 57 containers been labeled with the explosive warning label.
18. Do these remediation actions in domes 230, 231, and 375, change the waste treatment that LANL is permitted for?
19. Do these new configurations change the figures/unit descriptions and require a permit modification?
20. According to the latest STP report from LANL for the second quarter many containers from this waste stream are being stored at WCS, what precautions have been taken there? Will these containers be shipped back to LANL for remedial action?

21. In the "I. Introduction" section, there is a statement that indicates that, "the Isolation Plan describes how the Permittees will isolate, secure and/ treat all nitrate salt –bearing waste containers currently stored ". There may be a required Permit Modification Request (PMR) necessary for the term "treatment".
22. In the "III. Waste Container Categories" section, the term treatment occurs again and thus, a PMR will be required.
23. In the "IV. Immediate Actions for Remediated Nitrate Salt-Bearing Waste Containers" section, the number of 57 remediated nitrate salt-bearing waste containers infers the only one waste stream (LA-MIN02-V.001) is mentioned. Another stream (LA-MHD01.001) was not responded to as directed in the Administrative Order as mentioned in the BACKGROUND, Item 14.
24. In the "IV. Immediate Actions for Remediated Nitrate Salt-Bearing Waste Containers" section, in Part 2), the Permittees indicate that the temperature will be monitored. How will this be accomplished, through Infrared detection, charts of temperature over a period of time (a day), or visual examination and recording of the temperature.
25. Also in Part 2), there is mention of visual inspections of the overpacked drums. Is there a check list associated with this activity?
26. In Part 3) of the same section, there is mention of unpremeditated nitrate salt-bearing containers being spaced an adequate distance apart to limit any potential interactions with other containers. What exactly is this distance?

There are 56 container numbers on the Carlsbad List that are not on the LANL List

Four of these are SWB Overpacks with inner containers

PKG_ID
SB10174
SB50018
SB50019
SB50032

Three of these SWB Overpacks have their inner containers itemized in the LANL list:

Overpacked Into	Inner Cont	Salt Type
SB50018	69188	Nitrate
SB50018	68509	Nitrate
SB50018	69087	Nitrate
SB50019	68584	Suspect
SB50019	68342	Nitrate
SB50019	69103	Nitrate
SB50032	69195	Nitrate
SB50032	69077	Nitrate

The fourth SWB Overpack has inner containers that are MINO2 which are not Nitrate Salts:

OverpackedInto	PKG_ID	Salt Type	Waste Stream
SB10174	68643	NA	LA-MIN02-V.001
SB10174	S824056	NA	LA-MIN02-V.001
SB10174	S841295	NA	LA-MIN02-V.001
SB10174	S870129	NA	LA-MIN02-V.001

51 of the other 52 containers on the Carlsbad list which are not on the LANL list are MINO2 that are not Nitrate Salts:

PKG_ID	Overpacked Into	GG Stretch Status	Salt Type	Waste Stream
56621		Characterization Complete	NA	LA-MIN02-V.001
56684		Needs Characterization	NA	LA-MIN02-V.001
56806		Needs Characterization	NA	LA-MIN02-V.001
56880		Approved In WDS	NA	LA-MIN02-V.001
56895		Characterization Complete	NA	LA-MIN02-V.001

57753		In Characterization	NA	LA-MIN02-V.001
58027		Remediation Planned	NA	LA-MIN02-V.001
58155		Remediation Planned	NA	LA-MIN02-V.001
59301		Dispositioned	NA	LA-MIN02-V.001
59374	SB50559	Characterization Complete	NA	LA-MIN02-V.001
59415		Dispositioned	NA	LA-MIN02-V.001
62547	SB01907	Dispositioned	NA	LA-MIN02-V.001
62912		Dispositioned	NA	LA-MIN02-V.001
63116	SB01907	Dispositioned	NA	LA-MIN02-V.001
63130	SB50410	Dispositioned	NA	LA-MIN02-V.001
63182		Dispositioned	NA	LA-MIN02-V.001
63198	SB01907	Dispositioned	NA	LA-MIN02-V.001
63365		Dispositioned	NA	LA-MIN02-V.001
63401		Dispositioned	NA	LA-MIN02-V.001
63497	SB01907	Dispositioned	NA	LA-MIN02-V.001
63975		Characterization Complete	NA	LA-MIN02-V.001
64627		Dispositioned	NA	LA-MIN02-V.001
64665	SB01908	Dispositioned	NA	LA-MIN02-V.001
64863	SB01908	Dispositioned	NA	LA-MIN02-V.001
66376		Dispositioned	NA	LA-MIN02-V.001
66866		Dispositioned	NA	LA-MIN02-V.001
68383		Dispositioned	NA	LA-MIN02-V.001
68384		Dispositioned	NA	LA-MIN02-V.001
69212	SB50087	Dispositioned	NA	LA-MIN02-V.001
69233	SB50102	Dispositioned	NA	LA-MIN02-V.001
69236	SB50103	Dispositioned	NA	LA-MIN02-V.001
69320	SB50418	Approved In WDS	NA	LA-MIN02-V.001
69488		Approved In WDS	NA	LA-MIN02-V.001
70069		Remediation Planned	Suspect	LA-MIN02-V.001
82952	SB02094	Dispositioned	NA	LA-MIN02-V.001
90270		Dispositioned	NA	LA-MIN02-V.001
92284		Dispositioned	Cemented	LA-MIN02-V.001
92285		Dispositioned	Cemented	LA-MIN02-V.001
92286		Dispositioned	Cemented	LA-MIN02-V.001

93515		Dispositioned	NA	LA-MIN02-V.001
93516		Dispositioned	NA	LA-MIN02-V.001
93935	SB50026	Dispositioned	Miscellaneous	LA-MIN02-V.001
93951		Characterization Complete	NA	LA-MIN02-V.001
93953	SB50060	Dispositioned	NA	LA-MIN02-V.001
93955		Characterization Complete	NA	LA-MIN02-V.001
93957		Characterization Complete	NA	LA-MIN02-V.001
93960		Characterization Complete	NA	LA-MIN02-V.001
S802985	SB50432	Dispositioned	NA	LA-MIN02-V.001
S822714	SB01908	Dispositioned	NA	LA-MIN02-V.001
S832485	SB02204	Dispositioned	NA	LA-MIN02-V.001
S835380	SB02081	Dispositioned	NA	LA-MIN02-V.001
S851883		Remediation Planned	NA	LA-MIN02-V.001

The one container on the Carlsbad list which is not on the LANL list (70069) has been relabeled in the process of recent sampling.

Reoverpacking for Sampling  
Nitrate Salts

Unit	Date	DrumID	Into85GAL
B412	5/8/2014	S802701	70069

The earlier container ID (S802701) is on the LANL list.

PKG_ID	Salt Type	Waste Stream
S802701	Suspect	LA-MIN02-V.001