Mr. John E. Kieling, Bureau Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87508-6303

Subject: Submittal of 2014 Contact-Handled (CH) Bay Surge Storage Summary Report

Dear Mr. Kieling,

The purpose of this letter is to provide you with the 2014 CH Bay Surge Storage Summary Report pursuant to Permit Part 3, Section 3.1.1.4., Notification of CH Bay Surge Storage Use. The Permittees originally notified the New Mexico Environment Department of the use of surge storage on March 14, 2014.

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,

[Signature]

Jose R. Barocio, Manager  
Carlsbad Field Office

Robert L. McQuinn, Project Manager  
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure  
R. Maestas, NMED  
T. Kliphuis, NMED  
CBFO M&R  
*ED denotes electronic distribution

Background

Pursuant to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (Permit) Part 3, Section 3.1.1.4., Notification of CH Bay Surge Storage Use, the Permittees are required to submit an annual report to the Secretary by October 27 of each year summarizing Contact-Handled (CH) Bay Surge Storage Area usage. The purpose of this report is to provide the annual report for the period of July 1, 2013, through June 30, 2014. The Permittees used the CH Bay Surge Storage Area during this period to manage and store CH transuranic (TRU) mixed waste that could not be emplaced as a result of the fire and radiological events. Note that surge storage reports are only submitted when surge storage has been used during the year.

CH Bay Surge Storage Summary

An onsite event on February 5, 2014, involving a salt-haul truck fire in the WIPP underground and the February 14, 2014 radiological event resulted in the suspension of TRU mixed waste downloading and emplacement activities. At that time, CH TRU mixed waste was in permitted storage in the CH Bay of the Waste Handling Building (WHB) as well as the Parking Area Unit (PAU). No remote-handled (RH) TRU mixed waste was in permitted storage at the WIPP facility (i.e., PAU or WHB).

The CH TRU mixed waste packages in the PAU were moved into the CH Bay to be vented. To accommodate the CH TRU mixed waste stored in the PAU in the CH Bay, the use of surge storage was required. Surge Storage in the CH Bay is authorized pursuant to Permit Part 3, Section 3.1.1.3., Use of CH Bay Surge Storage. Because the PAU was not full, which is a condition necessary for the use of the WHB surge storage, the Permittees requested permission from the New Mexico Environment Department (NMED) to use surge storage. Use of the CH Bay Surge Storage Area was granted in the February 27, 2014, Administrative Order under the New Mexico Hazardous Waste Act §74-4-13.

The NMED was notified of the Permittees intent to use surge storage pursuant to Permit Part 3, Section 3.1.1.4 on March 14, 2014. An illustration of CH Bay Surge Storage is found in Figure 1 of this report.

The CH TRU mixed waste was moved from the PAU to the CH Bay Surge Storage Area starting on March 26, 2014. A total of 1,285 cubic feet was placed into the CH Bay Surge Storage Area. As of the end of the reporting period, the waste remains in the surge storage in the WHB. See Table 1 for a summary of CH Bay Surge Storage.
Figure 1
Waste Handling Building - CH TRU Mixed Waste Container Storage and Surge Storage Areas
Table 1
CH Bay Surge Storage Area Summary

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<th>Surge Storage Date</th>
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<th>Assembly</th>
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</table>

1 55-Gal Drum = 7.4 ft³, SWB = 66.3 ft³, TDOP = 160 ft³, SLB2 = 261 ft³ (Permit Part 3, Section 3.3.1)