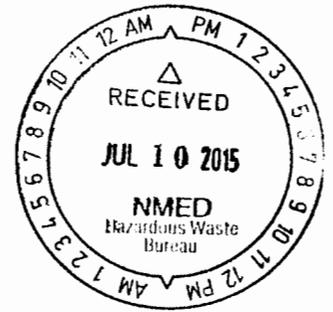




Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
JUL 09 2015



ENTERED



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: Information Requested by the New Mexico Environment Department During the August 5-6, 2014 Inspection of the WIPP Facility

Dear Mr. Kieling:

The purpose of this letter is to provide information requested by the New Mexico Environment Department (NMED), Hazardous Waste Bureau during the inspection of the WIPP Facility conducted on August 5-6, 2014. Accompanying this letter are three boxes of numerically labeled files containing the documentation requested by the NMED.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to 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. Anthony Stone at (575) 234-7475.

Sincerely,

Dana C. Bryson, Acting Manager
 Carlsbad Field Office

Philip J. Breidenbach, Project Manager
 Nuclear Waste Partnership LLC

Enclosures (3)

cc: w/o enclosures
 K. Roberts, NMED *ED
 R. Maestes, NMED ED
 S. Holmes, NMED ED
 CBFO M&RC
 *ED denotes electronic distribution

150704



**HWB Review of the 2014 Post Radiological Release WIPP Inspection Items
Review Completed on: July 21, 2015**

Summary: NMED HWB's Steve Holmes, Coleman Smith, Don Meyer and Michael Duran conducted a site inspection of the WIPP Facility on August 5 and 6, 2014. No adverse findings were discovered during the site visit. A list containing 21 requested items was handed to WIPP representatives. NMED received the requested items on July 10, 2015.

Steve Holmes reviewed the submitted information and he concluded that the information provided was complete and detailed enough to demonstrate WIPP was compliant with Permit requirements for this inspection. There were no adverse findings in this review. The review was completed on July 21, 2015.

A brief summary for each item follows below.

Item 1: *NMED HWB WIPP Group and NMED HWB Compliance and Technical Assistance Program will interview the Training Director, Thomas Lichty, to ensure that normal operational training was conducted between February 5, 2014 and May 29, 2014. NMED will review training records of personnel from SRS and INL (GET, special training for waste handling, etc.). Permit Conditions 1.7.7, 1.13, A1-1d, A2-2, A4-4, D-4a(2), Attachment F, Attachment F1, and Attachment F2. Mr. Lichty will provide training records for any five of these individuals.*

WIPP Response: While at the WIPP Facility on August 5-6, 2014, NMED reviewed the normal operational training conducted between February 5, 2014 and May 20, 2014. No additional training files were requested during the NMED physical file inspection. At that time NMED was informed that INL records are not maintained at the WIPP Facility. Therefore only SRS records are included in this submittal.

A spreadsheet was created by Mr. Lichty in which all seven individuals (there were only seven individuals the worked on the underground [UG] Recovery Plan efforts) took GET 214B; all seven took the basic safety class SAF502B; five took the QA class for writing CARs, CAR101; six took the waste handling class HWW200; six took the radiation worker class, RAD204; two took the personal protection class (PPE) for the Supplied Air Breathing Apparatus (SCBA); six took the safety class for the utilization of the Power Air Personal Respirator (PAPR); and one took the safety manager class, SAFG31H.

Steve Holmes of the NMED HWB reviewed the following WIPP procedures as was trained to the SRS specialists for the Recovery Plan: WP- 02RC-1101, Rev. 9, (Pg. 1-34), *Qualification and Certification of NDE Personnel Performing Radiography for TRU Waste Confirmation*; WP 02RC.12, Rev. 4, (Pg. 35-44), *Qualification of Personnel Performing Visual Examination for TRU Waste Confirmation*; WP 02-RC.13, Rev. 5, (Pg. 45-57), *Conduct of Operations for TRU Waste Confirmation*; WP 02RC-1101, Rev. 9, (Pg. 58-73), *Visual Examination for TRU Waste Confirmation*; WP 02-RC1102, Rev. 12, (Pg. 74-86), *Review of Radiography Media for TRU Waste Confirmation*; WP 02-RC1103, Rev. 9, (Pg. 87-115), *Radiography Inspection Operating Procedure for TRU Waste Confirmation*; WP 02-RC1105, Rev. 13, (Pg. 116-125), *Electronic Notification, Container Selection, and Data Entry for TRU Waste Confirmation*; WP 02-

RC1107, Rev. 7, (Pg. 126-133), *Management of Nonconforming Waste Identified During TRU Waste Confirmation*; WP 02-RC1108, Rev. 12, (Pg. 134-146), *Review of Visual Examination Records for TRU Waste Confirmation*; WP EA02RC1102-1-0, Rev. 7, (Pg.147-148), *TRU Waste Confirmation (RTR/VE) Approval Form*; WP EA02RC1102-2-0, Rev. 1 (Pg. 149-150), *TRU Waste Confirmation ITR Review Checklist*; and WP EA02RC1102-3-0, Rev. 1 (Pg. 151-154).

The reason that the SRS were trained on C7 Confirmation procedures is that they would have a better comprehension of how the waste was characterized.

A list of NWP personnel that operate in the C7 Confirmation activities was submitted along with the C7 Confirmation and we had asked for this information during the interview with Thomas Lichty, when we asked him how he was to train the SRS personnel to be operational in the UG in such a short period of time. He stated that the best and fastest method would be to go through Confirmation. Steve Holmes also agrees, after reviewing the data.

Included in the submittal of the data was the report of training for the SRS personnel.

The procedures are complete and these SRS personnel were trained on them. The data given indicates that the training is in compliance.

Item 2: *Please submit maintenance records and inspection data for the Air Intake Shaft Hoist (for the time frame of 11/02/2013-01/04/2014). Permit Condition Table E-1.*

WIPP Response: The inspection data is Pre-Operational. There were no operational activities until 11/06/2013. Therefore there is no data from 11/02/2013 to 11/06/2013.

The Permittees did, however, submit data from 11/06/13 to 01/30/2014. Included in the data is AIS Hoist Inspection with seven items (Examination of Work Area, Break Paths-Clean, Hoist Bearings-Oil Flow, Pump Reservoir-Oil Level, Lilly Controller-Functional, Hoist Generator-No Loose Connections, and Notification of CMR-Hoist Operations) ; the Collar Inspection with eight items (Examination of Work Area, Rope Connection-No Slippage, Cage Latches & Hinges, Cage Welds-No Cracks, Cage Phone or Radio, Mine Phone-Functional, Collar Doors, and Bell Signal-Functional); the Station Inspection with four items (Examination of Work Area, Safety Gates-No Damage, Bell Signal-Functional, and Mine Phone-Functional); and Galloway Inspection with seven items (Examination of Work Area, Communication-Functional, Rope Connection, Structure Welds-No Cracks, Trap Door & Wings, Fire Extinguisher-Charged, and First Aid Kit-Usable). The inspection also included comments, if any.

The AIS Hoist Operation's Log, as it is called, has three columns for three shifts (Night Shift, Day Shift, and Mid Shift) . Most entries are Day Shift.

The data submitted in the inspection requests are compliant for inspection of the Air Intake Shaft Hoist.

Item 3: *Please submit maintenance records and inspection data for the Underground Ambulances (for the time frame of 12/04/2013-02/04/2014). Permit Condition Table E-1*

WIPP Response: Inspection and maintenance data was conducted on 12/07/2013, 12/14/2013, 12/26/2013, 1/4/2014, 1/09/2014, 1/18/2014, 1/24/2014 and 2/01/2014.

These are all compliant with Table E-1.

Item 4: *Please submit maintenance records and inspection data for the Contact Handled (CH) TRU Underground Transporter(s) (for the time of 11/04/2013-2/04/2014). Permit Condition Table E-1.*

WIPP Response: For vehicle 52-H-008A, Pre Ops data was submitted for 11/05/2013-11/08/2013, 11/10/2013, 11/13/2013-11/15/2013, 11/17/2013-11/24/2013, 11/26/2013, 11/30/2013, 12/02/2013, 12/03/2013-12/05/2013, 12/07/2013-12/08/2013, 12/10/2013-12/11/2013, 12/14/2013-12/15/2013, 12/18/2013-12/21/2013, 12/27/2013-12/29/2013, 12/31/2013, 01/03/2014, 01/07/2014-01/12/2014, 01/14/2014-01/19/2014, 01/21/2014-01/22/2014, 01/24/2014-01/26/2014, 01/28/2014-02/02/2014, and 02/04/2014.

For vehicle 52-H-008B, Pre Ops data was submitted for 11/05/2013-11/08/2013, 11/17/2013-11/24/2013, 11/26/2013, 11/30/2013, 12/01/2013, 12/04/2013-02/05/2013, 12/07/2013-12/08/2013, 12/10/2013, 12/14/2013, 12/08/2013, 12/20/2013-12/21/2013, 12/31/2013, 01/07/2014-01/12/2014, 01/14/2014-01/19/2014, 01/21/2014-01/22/2014, and 01/24/2014-01/31/2014.

For vehicle 52-H-008C, Pre Ops data was submitted for 11/05/2013-11/06/2013, 11/10/2013, 11/14/2013-11/15/2013, 11/17/2013, 11/19/2013-11/23/2013, 11/26/2013, 11/30/2013, 12/01/2013, 12/04/2013, 12/07/2013-12/08/2013, 12/10/2013, 12/14/2013-12/15/2013, 12/18/2013-12/21/2013, 12-12/29/2013, 12/31/2013, 01/03/2014, 01/07/2014-01/09/2014, 01/11/2014-01/12/2014, 01/14/2014-01/21/2014, 01/25/2014, 01/29/2014-02/02/2014, and 02/04/2014.

Item 5: *Please submit maintenance records and inspection data for the Exhaust Shaft (for the last two Quarterly Inspections prior to 2/4/2014). Permit Condition Table E-1.*

WIPP Response: The CHAMPS Preventative Maintenance (Contractor to WIPP) Cover Sheet, along with the SIMON PM 4.0.03.000 Working Copy (another contractor for WIPP) Attachment 1 – Sign-Off Sheet was submitted for the following dates: 9/4/2013 and 09/05/2013, 11/14/2013. These were maintenance records.

To demonstrate inspections, two CDs showing videos of a camera being slowly guided down the exhaust shaft were submitted. One, dated 9/5/2013 identified the following items:

Air velocity tube @ 60', Radiation intake probes (south) @ 14', Radiation intake probe (west) @ 3', Radiation intake probe (east) @ 60', Cracks and seepage with running water similar to a small waterfall @ 115', Magenta aquifer and water ring @ 655', 13.8kv feeder on west wall @ 720', Instrument cables north wall @ 705' 4-inch airline on east wall at 720', 2-inch water line on east wall @ 735', Culebra aquifer and water ring @ 795-938', Key and water ring @ 938', and Chain-link fencing @ 1010-1852'. The second CD was recorded on 11/14/2013 and identified the following: Shaft Collar @ 13', Radiation intake probe (south) @ 13', 13.8 kV on

west wall @ 720', Magenta aquifer and water ring @ 795-938', Key and water ring @ 935', and Chain-link fencing @ 1852'.

It must be noted that there was an abundance of salt stalactites hanging down off of all structures identified above.

The submitted items appear to indicate compliance with the Permit.

Item 6: *Please submit maintenance records and inspection data for the Fire Detection and Alarm System (for the time frame of the entire year of 2013) Permit Condition Table E-1.*

WIPP Response: WIPP submitted Operations Log of Fire Alarm Inspections of all alarms at the WIPP Site for the following dates: 01/06/14 (with Operations Log # 22912), 01/08/13 (Operations Log # 23316), 07/10/2013 (Operations Log # 21555) and 09/11/2013 (Operations Log # 21707) for inspections of the alarms site wide. They also provided three maintenance worksheets and four CMR screen shots of system analysis, indicating that the alarms are functional.

Item 7: *Please submit maintenance records and inspection data for the Fire and Emergency Response Truck [Seagrave Fire Apparatus, Emergency One Apparatus, and Underground Rescue Truck] (for the time frame of 11/04/2013-2/04/2014). Permit Condition Table E-1.*

WIPP Response: The Permittees submitted fourteen inspection reports for the Seagrave Fire Apparatus (fire truck) for the following dates: 10/31/2013, 11/07/2013, 11/14/2013, 11/21/2013, 11/27/2014, 12/05/2013, 12/16/2013, 12/20/2013, 12/26/2013, 12/31/2013, 01/09/2014, 01/16/2014, 01/24/2014, 01/31/2014, and 02/07/2014. Maintenance only occurs if the inspections find a "Maintenance Required Immediately" situation. This would be written on the inspection.

For the Underground Rescue truck, the Permittees submitted thirteen inspection reports for the following dates: 10/31/2013, 11/07/2013, 11/14/2013, 11/22/2013, 11/30/2013, 12/07/2013, 12/13/2013, 12/18/2013, 12/26/2013, 01/04/2014, 01/11/2014, 01/17/2014, and 01/25/2014. Maintenance only occurs if the inspections find a "Maintenance Required Immediately" situation. This would be written on the report.

For the Emergency One Apparatus (truck), the Permittees submitted XXXX inspection reports on the following dates: 11/7/2013, 11/13/2013, 11/20/2013, 11/28/2013, 12/04/2013, 12/11/2013, 12/18/2013, 12/23/2013, 12/31/2013, 01/06/2014, 01/15/2014, 01/22/2014, 01/29/2014, and 02/07/2014.

Since the inspection is to be inspected weekly, the Permit Condition has been met and WIPP is in compliance for this item.

Item 8: *Please submit maintenance records and inspection data for the Mine Pager Phones [between the Surface and the Underground] (for the time frame of four months prior to 02/04/2014). Permit Condition Table E-1.*

WIPP Response: The Permittees submitted a CHAMPS (see above) Preventative Maintenance Cover Sheet (PM CS) regarding the communication device (pager phones) dated 11/01/2013;

another PM CS of the pager phones dated 11/26/2013; a third PM CS of the pager phones dated 12/26/2013, and a fourth PM CS of the pager phones dated 01/30/2014.

These clearly indicate that the Permittees are in compliant for this item.

Item 9: *Please submit maintenance records and inspection data for the MSHA Air Quality Monitor (for the time frame of 12/04/2013-02/04/2014). Permit Condition Table E-1.*

WIPP Response: WIPP submitted Bump Certificates for the ITX Multi-Gas Monitor, Instrument SN 03050008275 to field check Combustible-LEL Sensors for Methane, Oxygen, and Carbon monoxide on the following dates: 12/04/2013, 12/06, 2013, 12/08/2013, 12/10/2013, 12/12/2013, 12/13/2013, 12/15/2013, 12/17/2013, 12/18/2013, 12/19/2013, 12/22/2013, 12/26/2013, 12/28/2013, 12/30/2013, 12/31/2013, 01/03/2014, 01/05/2014, 01/07/2014, 01/09/2014, 01/11/2014, 01/13/2014, 01/15/2014, 01/16/2014, 01/18/2014, 01/20/2014, 01/22/2014, 01/24/2014, 01/26/2014, 01/28/2014, 01/30/2014, 02/01/2014 and 02/03/2014.

The Permittees also submitted the same type of data for Instrument SN 0305008300 for the following dates: 12/5/20/2013, 12/07/2013, 12/09/2013, 12/09/2013, 12/12/2013, 12/14/2013, 12/16/2013, 12/18/2013, 12/19/2013, 12/20/2013, 12/21/2013, 12/23/2013, 12/27/2013, 12/29/2013, 01/02/2014, 01/04/ 2014, 01/06/2014, 01/08/2014, 01/10/2014, 01/12/2014, 01/14/2014, 01/14/2014, 01/17/2014, 01/19/2014, 01/21/2014, 01/23/2014, 01/25/2014, 01/27/2014, 01/29/2014, 01/31/2014, 02/02/2014, and 02/04/2014.

The data is compliant with the Permit.

Item 10: *Please submit maintenance records and inspection data for the Public Address [Surface and Underground] (for the time frame of four months prior to 02/04/2013). Permit Condition Table E-1*

WIPP Response: The Permittees submitted four test inspection of the Public Address System for the following dates: 11/26/2013, 12/26/2013, 01/23/2014, and 01/30/2014.

The data indicates that the Permittees are compliant with the Permit.

Item 11: *Please submit maintenance records and inspection data for the Rescue Truck(s) [Surface and Underground] (for the time frame of 12/02/2013-02/04/2014). Permit Condition Table E-1.*

WIPP Response: See Surface Rescue Truck and Underground Rescue Truck data listed above in Item #7.

The Permittees are in compliance with the Permit.

Item 12: *Please submit maintenance records and inspection data of the Salt Handling Salt for the time frame of 11/04/2013-02/04/2014). Permit Condition E-1*

WIPP Response: The Permittees submitted the "Salt Hoist Operator's Log" for the daily inspections and comments for the dates given.

The permittees are compliant with the Permit.

Item 13: *Please submit maintenance records and inspection data for the Self-Rescuers (for the last two Quarterly Inspections prior to 02/04/2014). Permit Condition E-1*

WIPP Response: The Permittees submitted the Self-Rescuer Quarterly Check (WP 04-AU1026< Rev. 5, Attachment 1) for the following devices: Model ID No. W-65, 260 units were tested, all of which passed the tests on 09/25/2013-12/02/2013. They also submitted another 137 units under the same procedure on 12/28/2013 - 1/29/2014 and all passed the tests.

The Permittees are in compliance for this item of the Permit.

Item 14: *Please submit maintenance records and inspection data for the Underground Openings-Roof Bolts and Travelways (for the time frame of 11/04/2013-02/04/2014). Permit Condition Table E-1.*

WIPP Response: The Permittees submitted WP 04-AU1007, Rev 13., Attachment 1 for 73 bolts and plates (12' x 12" steel plate just atop the ceiling with the bolt through it) inspected with 3 replacements on 10/28/2013; 12 bolts and plates inspected with 1 replacement on 10/29/2013; 52 bolts and plates inspected with 1 replacement on 11/05/2013; 51 bolts and plates inspected with 2 replacements on 11/06/2013; 67 bolts and plates inspected with 4 replacements on 11/12/13-11/14/2013; 127 bolts and plates inspected with 8 replacements on 11/18/13-11/20/2013; 103 bolts and plates inspected with 9 replacements on 11/24/2013-11/27/2013; 116 bolts and plates inspected with 4 replacements on 12/02/2013-12/04/2013; 105 bolts and plates inspected with 3 replacements on 12/09/2013; 96 bolts and plates inspected with 12 replacements on 12/09-12/17/2013; 119 bolts and plates inspected with 9 replacements on 12/22/2013; 106 bolts and plates inspected with 11 replacements on 12/30/2013; 107 bolts and plates inspected with 16 replacements on 01/06/2014-01/08/2013; 108 bolts and plates inspected on 01/13/2013; 107 bolts and plates inspected with 7 replacements on 01/21/2013; and 106 bolts and plates inspected with 3 replacements on 01/27/2014-01/29/2014.

This data indicates compliance of the Permit.

Item 15: *Please submit maintenance records and inspection data for the Underground-Geomechanical Instrumentation System (GIS) (for the time frame of 10/04/2013-02/04/2014). Permit Condition E-1*

WIPP Response: The Permittees submitted an electronic mail from Rey Carrasco (NWP) to Steve Travis (WRES) pertaining to the GIS Geomechanical Monitoring Inspection results. The 17 inspections were the following: GIS Field Data Sheet for 10/01/2013, 10/01/2013-09/30/2013, 10/07/2013-10/08/2013, 10/15/2013-10/017/2013, 10/21/2013-10/22/2013, 10/28/2013-10/29/2013, 11/04/2013-11/06/2013, 11/12/2013-11/13/2013, 11/18/2013-11/19/2013, 11/19/2013-11/26/2013, 12/02/2013-12/03/2013, 12/09/2013-12/11/2013,

12/16/2013-12/17/2013, 12/30/2013-12/31/2013, 01/06/2014-01/07/2014, 01/13/2014-01/15/2014, 01/20/2014-01/22/2014, 01/27/2014-01/29/2014, and 02/03/2014-02/05/2014.

These tests on the GIS indicate compliance with the Permit.

Item 16: *Please submit maintenance records and inspection data of the Underground Mixed Waste Disposal Area (for the time from of the last two Quarterly Inspections prior to 02/04/2014). Permit Condition Table E-1*

WIPP Response: The Permittees submitted WP 05-WH1810, Rev. 14, Attachment 1, Preoperational Underground TRU Mixed Waste Disposal Area Inspections from 07/02/2013 through and including 12/30/2013. The second inspections were data from 01/30/14 through and including 02/05/2014.

These are daily inspections of the waste consisting of U/G Work Area Ground Control Satisfactory in Accordance with WP 04-AU1007; Room Ventilation Rate (35,000 scfm/42acfm); No Evidence of Adverse Health/Safety Conditions; Unobstructed Access to Exposed Face of Emplaced Containers; Area free of Debris; No Evidence of Sills/Leaks from Containers; Adjacent Mine Pager Phones Operational; U/G Phone System Operational; Warning Signs Posted; and PCB Warning Signs Posted on Radiological boundary at the Entrance and Exhaust side to Active Room, along with Performer Initials and Reviewer Initials.

All inspection, performed on a daily basis and before any Active Room activities indicate that the Permittees are compliant with the Permit.

Item 17: *Please submit maintenance records of the Waste Hoist (for the time frame of 10/04/2013-02/04/2014). Permit Condition Table E-1*

The Permittees provided daily inspections of the Waste Hoist on the Waste Hoist Operator's Log from 10/04/2013-02/04/2014. The inspections consist of the following: Waste Hoist Inspection [Examination of the Area, Disc Brake Paths Clean, Hoist Bearings, Brake Reservoir-Oil Level, Brake Drain Lines, Brake Drain Collector, Motor Shaft Ground Brushes, Lilly Controller, Brake Maintenance Valves-Locked, and Notification to CMR-Hoist Operational.

If any one item is negative, then an order to shut down and repair is carried out. No maintenance was conducted during the time frame given above.

The daily inspection sheets indicate that the Permittees are compliant with the Permit.

Item 18: *Please submit maintenance records and inspection data of the Explosion-Isolation Walls (for the time frame of the last two Quarterly Inspections prior to 02/04/2014). Permit Condition Table E-1*

WIPP Response: The Permittees submitted an electronic mail from Ben 'Ty' Zimmerly, Mine Engineering, NWP, to Steve Travis, WRES on 08/25/2014, stating that "No maintenance has been performed on any of the block walls". The Permittees also submitted inspections of the Explosion Isolation Wall, Panel 1 Intake on 11/04/2013, with a comment of "Corners of bulkhead taking weight", meaning early signs of buckling. No action required.

Another inspection was conducted at the same location on 02/03/2014 with no comments. Another inspection of the Explosion Isolation Wall of Panel 1 Intake took place on 11/04/2013 with a comment of "First layer of block and part of second on surface east side down" meaning some extreme wear and crumbling of some blocks due to buckling of the face of the wall.

An inspection of the Explosion Isolation Wall of Panel 2 Intake took place on 11/03/2013, with the comment of "First layer on south east side down", meaning the first set of blocks have all crumbling away from the wall onto the ground. Another inspection, dated 02/03/2013 was conducted with comment of the same Explosion Isolation Wall of Panel 2 Intake.

Another inspection on the Explosion Isolation Wall Panel 2 Exhaust was conducted on 11/04/2013 with the following comment, "Flaking on top first layer", meaning that the blocks are experiencing buckling and erosion from the salt. Another inspection was conducted on 02/03/2014 for the same location with no comment.

On 11/04/2013, the Explosion Isolation Wall of Panel 5 Intake was conducted with a comment of "No comment". On the same day, another inspection occurred for Panel 5 Exhaust Explosion Isolation Wall with no comment.

This data indicates that the Permittees are compliant with the Permit.

Item 19: *Please submit maintenance records and inspection data for the Filled Panel (for the time frame of 09/04/2013-02/04/2014). Permit Condition Table E-1*

WIPP Response: The Permittees submitted 22 items to achieve compliance.

On 09/05/2013-09/06/2013, an inspection of the Bulkhead of Interim Panel 3 Closure Intake was conducted. The local fire panel 534-FP0700 is no longer in service (and cannot be repaired) and the bulkhead is taking weight (early signs of buckling). Another inspection on 10/07/2013 was conducted at Panel 3 Intake. The bulkhead is still taking weight due to salt creeping. Another inspection of the bulkhead of Panel 3 Intake indicated that there is even more taking weight at a faster rate than expected. This was on 11/03/2013. A fourth inspection of the same panel indicated that the bulkhead was taking weight. Rubber flashing separated from rib and metal flashing was also separating from the rib. On 01/06/2014, another inspection occurred at Panel 3 Intake bulkhead. On 02/02/2014, another inspection was conducted and the bulkhead had slowed down taking weight.

On 09/04/2013-09/05/2013, the Bulkhead of Isolation Panel 3 Exhaust was inspected. The comment "Looked Good" was the inspection result. Another inspection of the Bulkhead of Isolation Panel 3 Exhaust was taken on 10/07/2013-10/10/2013 with the comment "Performed panel closure inspection no unexpected outcomes". Another inspection occurred on 11/04/2013 on the same location. The comment was "No concerns". The December inspection of the Bulkhead of Isolation Panel 3 Exhaust was conducted on 12/02/2013 with a comment of "No Concerns". On 12/26/2013 for the inspection and 01/06/2014 for the QA of the data, an inspection of the Bulkhead for Isolation Panel Exhaust was performed. The comment was "No concerns". On 02/03/2014, the January inspection occurred. The comments were "Flashing-good, Flashing joints-good, Skin-good, Ground deformation-minimal".

On 09/09/2013-09/10/2013, the Bulkhead of Interim Panel 4 Closure Intake was inspected. The comment was "No problems found". On 10/13/2013-10/14/2013, the October inspection of the same bulkhead was performed. The comment was "Performed PM/No Problems/Sat some floor

heave on north side, will need to watch for on next PM". On 11/11/2013, the November inspection was performed. The comment was "Bulkhead in good condition". On 12/09/2013, the December inspection of the same bulkhead was reformed. The comment was "No concerns". On 01/14/2014, the January inspection was reformed. The comment was "No concerns". On 09/09/2013-09/10/2013, the Bulkhead of the Interim Panel 4 Closure Exhaust was performed. The comment was "Bulkhead has separated in the center, squeezing ribs and back, Submit A/R # 1307670 Repair Request". On 10/13/2013-10/14/2013, the October inspection was performed on the same bulkhead. The comment was "PM/Performed Inspection/Bulkhead needs attention/Submitted A/R # 1307670 for repairs". On 11/12/2013, the November inspection was performed on the same bulkhead. The comment was "Bulkhead has separation on center from back to floor". Another comment was "Area posted for VOCs". On 12/09/2013, the December inspection was performed on the same bulkhead. The comment was "Separation in middle section due to back settling down". On 01/14/2014, the January inspection was performed on the same bulkhead. The comment was "No concerns".

The data provided by the Permittees indicated that the Permittees are in compliance with the WIPP Permit.

Item 20: *The Permittees shall submit data to NMED that all guideline and requirements were met when the RCRA Contingency Plan was activated into effect. Permit Condition Attachment D.*

WIPP Response: The Permittees submitted the following to NMED to comply with the Permit:

1. A letter from George W. Hellstrom and Dennis N. Cook to Jeffery Kendall dated March 21, 2014 with the subject of "Response to Information Request, WIPP Permit Section 1.7.8. This letter explained that the Facility Shift Manager (FSM) on duty at the time of the radiological release excursion decided that the situation did not meet the criteria in Permit Attachment D, Section d-3, requiring implementation of the RCRA Contingency Plan. The letter went on to read that the Permittees would implement the Plan when the Permittees could enter the underground as part of the recovery plan (which was not yet finalized).
2. A letter from Jose Franco and Robert McQuinn to John Kieling dated April 28, 2014 with the subject of Report on Implementation of the Waste Isolation Pilot Plant Facility Resource Conservation and Recovery Act Contingency Plan on April 22, 2014. Basically, the latter stated that the Plan was in effect and implemented.
3. WIPP Procedure WP 04-AD3033-1, Rev.), Attachment I WIPP Hazardous Material Incident Report, dated 11/04/2013, an investigation of the details of the implementation of the Contingency Plan. Included in the investigation was Agencies (DOE, HQ; Carlsbad Police; Carlsbad Fire Department; Eddy County Sheriff,; Hobbs police; Hobbs Fire department; John Kieling; New Mexico State Police; Lea County Emergency Manager; Eddy County Local Emergency Planning Manager; NMED, NM Department of Public Safety; Department of Public Safety WIPP Coordinator; NM State EOC and Watch Office; NM Department of Homeland Security WIPP Coordinator and State Emergency Response Commission; National Response Center; Miles Ranch; Smith Ranch; Berry Ranch; Mobley ranch;; Devon; Yates Petroleum; OXY; Bobco; and Linn Oil and that notified and by whom.

4. An electronic mail dated 04/11/2014@1031 hours from Koreen Guillermo (NWP) to I. Velasquez (Lea County) and Rick Chavez (RES) to notify that the Contingency Plan was activated.
5. An electronic mail dated 04/11/2014@1142 hours;from Lorenzo Velasquez (see above # 4) to Koreen Guillermo (see # 4 above) about being notified of the activation of the Contingency Plan.
6. An electronic mail dated 04/11/2014@1140 hours from Koreen Guillermo to DOE HQ informing them of the activation of the Contingency Plan.
7. An electronic mail dated 04/11/2014@1140 hours from Julia Muse (DOE HQ) to Koreen Guillermo stating receipt of information of activation of the Contingency Plan.
8. An electronic mail dated 04/11/2014@1140 hours from NSSA/DOE to Koreen Guillermo of the receipt of information of the activation of the Contingency Plan.
9. An electronic mail dated 04/11/2014@1143 hours from Gale Martin (DOE HQ) to Koreen Guillermo of receipt of information of the activation of the Contingency Plan.
10. An electronic mail dated 04/11/2014@1210 hours from Craig Jackson (DOE HQ) to Koreen Guillermo of receipt of the information of the activation of the Contingency Plan.
11. An electronic mail dated 04/11/2014@1214 from DOE Office of Environmental Management to Koreen Guillermo of receipt of information of activation of the Contingency Plan.
12. A letter dated April 22, 2014 from Rick Chavez (Manager, Regulatory Environmental Services) to Robert McQuinn (Project Manager, NWP) with the subject of Transmittal of the Report of Implementation of the Waste Isolation Pilot Plant Resource Conservation and recovery Act Contingency Plan on April 11, 2014. Per the Contingency Plan, the Permittees have to create a Report of the reason the Contingency Plan was activated to NMED and US EPA Region IV. This report was due on April 28, 2014.
13. The Report of the Implementation of the Waste Isolation Pilot Plant Facility Resource Conservation and Recovery Act Contingency Plan, dated April 11, 2014. The report explains what happened (to the best of the knowledge at that time), and type of reaction (to the best of the knowledge at that time), and the date and time of the excursion. They also provided the name and quantity of materials involved. The extent of injuries (WIPP stated no injuries) was also included in the report. They also provided an assessment of actual or potential hazards to human health or the environment. The last piece of information was the list that WIPP contacted for informing agencies and immediately close establishments of the activation of the Contingency Plan, as well as the times on April 11, 2014.

The Permittees have met the requirements as stated in Attachment D of the Permit and seem to be compliant.

Item 21: *Please submit the locations and inspection data of all isolated containers from LANL waste stream LA-MIN02_V.001 for the time frame July 07, 2014 through July 21, 2014.*

WIPP Response: Steve Holmes had a phone call from Stewart Jones asking if we wanted just the drums at WIPP or the entire stream he responded that the drums only at WIPP. WIPP provided a spreadsheet with columns for Container Number, Current Location, Waste Stream Profile Code (waste stream, LA-MIN01-V.0010), Shipment Number, and Emplacement Location. The

spreadsheet had 1,845 containers current located in the underground at WIPP. Steve Holmes logged onto the WDS and WWIS sites and verified that the number was correct and Steve also selected 19 drums at random and checked if the locations matched. They did match.

The information given is compliant with the Permit.

WIPP also provided the following WIPP Procedures (WP): WP 02-RD.11, Rev. 7; WP 02-RC12, Rev. 4; WP 02-RC13, Rev. 5; WP 02-RC1101, Rev. 9; WP 02-RC1102, Rev. 12; WP 02-RC1103, Rev. 9; WP 02-RC1105, Rev. 13; WP 02-RC1107, Rev. 7; WP 02-RC1108, Rev. 12; WP EA02RC1102-1-0, Rev. 7; WP EA02RC1102-2-0 Rev. 1.

Conclusion: Steve Holmes reviewed the submitted information and he concluded that the information provided was complete and detailed enough to demonstrate WIPP was compliant with Permit requirements for this inspection. There were no adverse findings in this review.

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