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 Carlsbad Field Office
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OCT 27 2015

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

Subject: Submittal of the 2015 CH Bay Surge Storage Summary Report

Dear Mr. Kieling:

The purpose of this letter is to provide you with the *2015 Contact-Handled (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 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. George T. Basabilvazo at (575) 234-7488.

Sincerely,

Todd A. Shrader, Manager
 Carlsbad Field Office

Philip J. Breidenbach, Project Manager
 Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure
 K. Roberts, NMED * ED
 R. Maestas, NMED ED
 S. Holmes, NMED ED
 C. Smith, NMED ED
 D.C. Gadbury, CBFO ED
 CBFO M&RC

*ED denotes electronic distribution



Surge Storage 2015 Annual Report

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 27th of each year summarizing CH Bay Surge Storage Area usage. The purpose of this report is to provide the annual report for the period of July 1, 2014, through June 30, 2015. The Permittees used the Contact-Handled (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 that occurred in February 2014. Note that surge storage reports are only submitted when surge storage has been used during the year.

CH Bay Surge Storage Summary

An onsite emergency on February 5, 2014, involving a fire in the WIPP underground and a February 14, 2014 radiological event resulted in the suspension of TRU mixed waste downloading and emplacement activities. At that time, waste was in permitted storage in the CH Bay of the Waste Handling Building (WHB) as well as the Parking Area Unit (PAU).

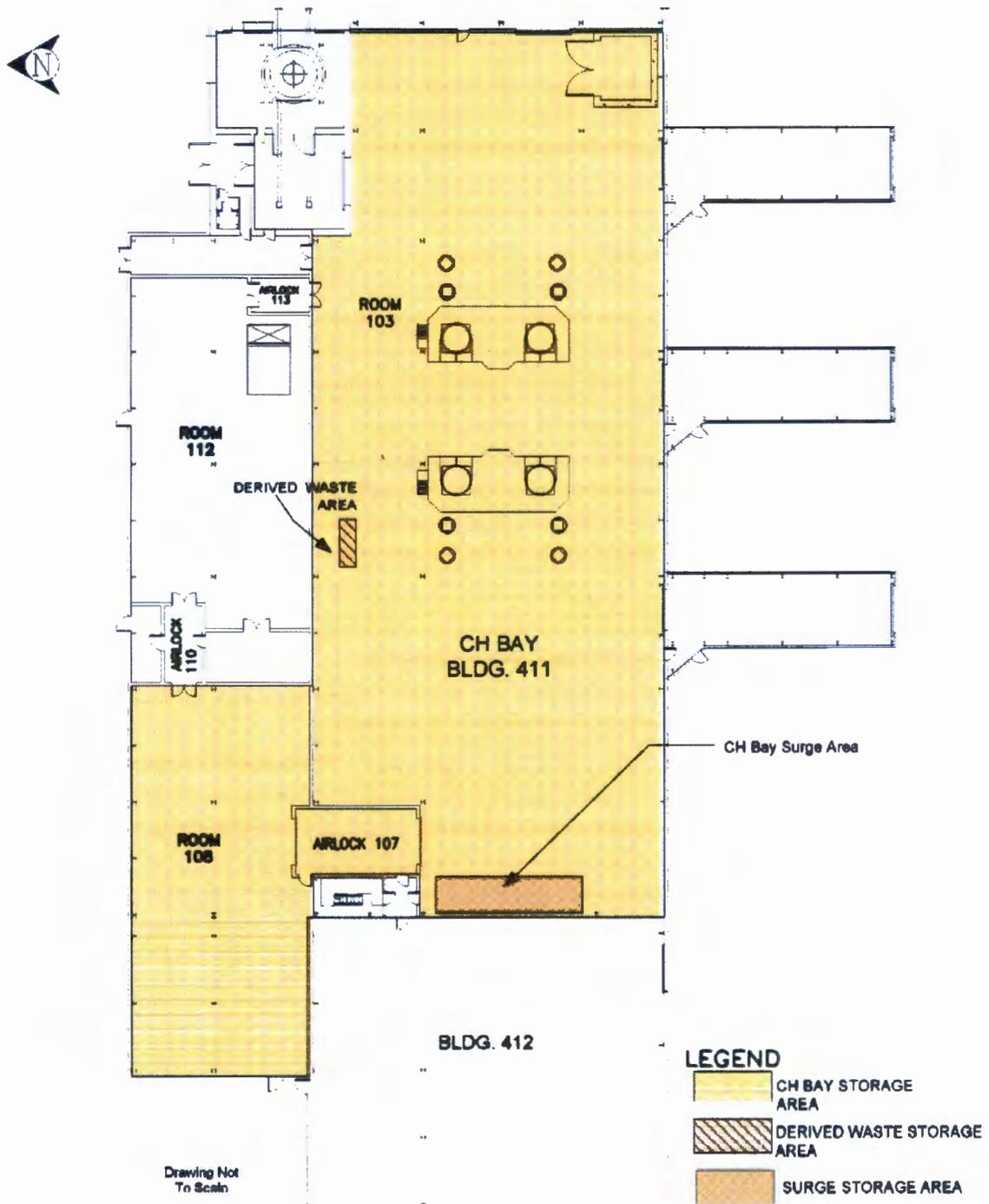
The three TRU waste shipments that were en-route to the WIPP facility on February 5, 2014, were allowed to proceed to the WIPP facility and parked in the PAU. No remote-handled (RH) TRU waste shipments were en-route to the WIPP facility or in permitted storage at the WIPP facility (i.e., PAU or WHB).

The CH TRU mixed waste packages in the PAU were moved into the CH Bay to be unloaded. 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 Area 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 of waste 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**

Surge Storage Date	Shipment	Assembly	Contents	Volume¹ (ft³)
3-26-14	IN140045	IN139923	TDOP	160
	IN140044	IN139670	TDOP	160
3-26-14	SR314013	SR139789	SLB2	261
3-26-14	SR140005	SR139996	5-55Gal Drums	37
		SR139997	7-55Gal Drums	51.8
	SR140005	SR140015	5-55Gal Drums	37
		SR140016	7-55Gal Drums	51.8
3-27-14	LA140020	LA139965	SWB	66.3
		LA139966	SWB	66.3
	IN140043	IN140096	SWB	66.3
		IN140097	SWB	66.3
3-27-14	SR314014	SR139793	SLB2	261
				1,285 ft³

¹55Gal Drum=7.4 ft³, SWB=66.3 ft³, TDOP=160 ft³, SLB2=261 ft³ (Permit Part 3, Section 3.3.1)