



State of New Mexico  ENTERED
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 23, 2017

Todd Shrader, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

**RE: NMED RESPONSE TO the CBFO CLARIFICATION LETTER REGARDING LANL FINAL
AUDIT REPORT A-16-19 RELATED TO SUMMARY CATEGORY GROUPS S3000 AND S5000
WASTE AND WASTE PROCESSED THROUGH THE WCRRF
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Mr. Shrader:

The New Mexico Environment Department (NMED) is in receipt of your letter with subject title: *“Clarification of the Enclosure to the LANL Final Audit Report A-16-19 Related to Summary Category Groups[SCGSs] S3000 and S5000 Waste and Waste Processed Through the WCRRF”*, dated June 8, 2017, (Clarification Letter). The Clarification Letter addressed parts of the Carlsbad Field Office’s (CBFO) language in the Final Audit Report for Audit A-16-19 of the Los Alamos National Laboratory/ Central Characterization Project (LANL/CCP), dated August 9, 2016, related to SCGs S3000 and S5000 waste and waste processed through the Waste Characterization, Reduction and Repackaging Facility (WCRRF) at LANL.

The August 9, 2016, LANL/CCP Final Audit Report included information that the audit scope did not include SCG S3000 waste or any other wastes processed through the WCRRF since TRU waste characterization activities at the WCRRF had been suspended since July of 2014. On April 19, 2017, NMED approved the Final Audit Reports for LANL/CCP Audits A-14-19, A-15-21 and A-16-19. Shortly after this approval, CBFO informed NMED that CBFO felt it would be best to clarify, for the record, that remediation activities at the LANL WCRRF are outside the responsibility of the CCP Certified Program.

170624



Mr. Shrader
June 23, 2017
Page 2

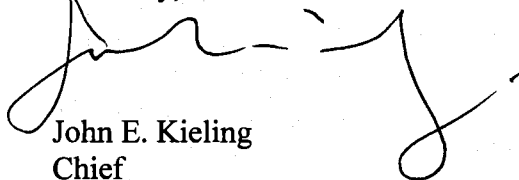
The June 8, 2017 Clarification Letter stated; "The previous CBFO recertification audits performed of LANL/CCP did not evaluate remediation activities performed at the WCRRF because the remediation activities are not part of the CCP Certified Program. Remediation activities are performed by LANL. Once remediation activities have been completed, containers are sent back to the CCP Certified Program for re-characterization."

NMED notes that during some of the previous LANL/CCP Audits, prior to 2013, the CBFO Audit team and NMED observers would tour the WCRRF at LANL as part of the overall audit activities, for informational purposes only. This tour at WCRRF did take place during the last several audits for various reasons but NMED understands that remediation activities performed at the WCRRF are outside of the CCP Certified Program. NMED also understands that any waste containers that may have been remediated at WCRRF are then sent back to the CCP where they are certified using waste characterization testing methods as described in WIPP Permit Attachment C1. NMED further notes that as part of the new WIPP waste characterization enhancements, CCP will have greater access to observing LANL remediation activities at the WCRRF and NMED looks forward to observing this new activity.

The June 8, 2017 Clarification Letter also included information on Surveillance S-17-34 that was performed by CBFO for the LANL/CCP, in part to further evaluate the waste characterization of previously certified SCG S5000 waste that is in storage at Waste Control Specialists, in Andrews, Texas. The Surveillance verified that this waste meets the applicable enhanced requirements.

NMED appreciates your Clarification Letter regarding the WCRRF activities at LANL and for providing a copy of Surveillance Report S-14-34 for the record. No further action is required at this time. If you have any questions regarding this matter, please contact Ricardo Maestas at (505) 476-6050.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: R. Maestas, NMED HWB
D. Biswell, NMED HWB
S. Lucas-Kamat, NMED DOE/OB
L. King, EPA Region 6
T. Peake, EPA ORIA
J. Carswell, CBFO
J. Stroble, CBFO
G. Basabilvazo, CBFO
M. Brown, CBFO
File: WIPP '17