



Department of Energy
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OCT 06 2017



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: Class 1 Permit Modification Notification to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF

Dear Mr. Kieling:

Enclosed is a Notification of Class 1 Permit Modification for the following items:

- Editorial Correction in Attachment A4, Section A4-3
- Update to Attachment E, Table E-1
- Add Live Fire Extinguisher Refresher Training to Attachment F2

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 Shrader, Manager
Carlsbad Field Office



Bruce C. Covert, Project Manager
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure

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Class 1 Permit Modification Notifications

**Editorial Correction in Attachment A4, Section A4-3
Update to Attachment E, Table E-1
Add Live Fire Extinguisher Refresher Training to Attachment F2**

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

WIPP Permit Number - NM4890139088-TSDF

October 2017

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Overview of the Permit Modification Notifications

This document contains three Class 1 Permit Modification Notifications (**PMNs**) for the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit (**Permit**) Number NM4890139088-TSDF.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Nuclear Waste Partnership LLC, collectively referred to as the Permittees, in accordance with Permit Part 1, Section 1.3.1. (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (**CFR**) §270.42(a)). The PMNs in this document are necessary to notify the New Mexico Environment Department (**NMED**) of changes which impact the Permit. These changes do not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the Permit and any related supporting documents are provided in these PMNs. The proposed modification to the text of the Permit has been identified using red text and double underline and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by italicized text.

Attachment A
Description of the Class 1 Permit Modification Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

Item No.	Affected Permit Section	Change Description	Category
1.	Permit Attachment A4, Section A4-3	This modification revises Permit Attachment A4, Section A4-3, <i>Waste Handling Building Traffic</i> , to correct a reference from "Attachment M1" to "Attachment A1."	A.2
2.	Permit Attachment E, Table E-1	This modification revises Permit Attachment E, Table E-1, <i>Inspection Schedule/Procedures</i> , to include the monthly inspection of automatic on-board fire suppression systems (WP 12-FP0085). Currently, only the semiannual inspection is required by the Permit (WP 12-FP0060).	A.1
3.	Permit Attachment F2	<p>This modification updates Permit Attachment F2, <i>Training Course and Qualification Card Outlines</i>, by adding a new course outline for SAF-502FR, <i>Live Fire Extinguisher Refresher Training</i>.</p> <p>Additionally, this modification updates the course outline for SAF-502F, <i>Live Fire Extinguisher Training</i>, in Permit Attachment F2 to define the four elements of the "PASS system" in the course description.</p>	<p>B.5.b</p> <p>A.1</p>

Item 1

Description

This modification revises Permit Attachment A4, Section A4-3, *Waste Handling Building Traffic*, to correct a reference from "Attachment M1" to "Attachment A1."

Basis

This change is classified as a "Correction of typographical errors" and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, A.2).

Discussion

This change is needed to correctly reference Attachment A1 for a more detailed description of waste handling in the Waste Handling Building.

Proposed Revised Permit Text:

A4-3 Waste Handling Building Traffic

The cask is unloaded from the trailer in the RH Bay and is placed on the Cask Transfer Car. The Cask Transfer Car is used to move the cask to the Cask Unloading Room. At this point, a crane moves the waste to the Hot Cell or the Transfer Cell. Some RH TRU mixed waste may be moved to the Hot Cell for overpacking before being moved to the Transfer Cell. Once in the Transfer Cell, the Transfer Cell Shuttle Car moves the waste beneath the facility cask. A crane is used to move the waste from the Transfer Cell Shuttle Car into the facility cask. The Facility Cask Transfer Car then moves the facility cask to the underground. A more detailed description of waste handling in the WHB is included in Attachment MA1. Figures A4-5, A4-6 and A4-7 show RH TRU mixed waste transport routes.

Item 2

Description

This modification revises Permit Attachment E, Table E-1, *Inspection Schedule/Procedures*, to include the monthly inspection of automatic on-board fire suppression systems (WP 12-FP0085). Currently, only the semiannual inspection is required by the Permit (WP 12-FP0060).

Basis

This change is classified as an "Administrative and informational change" and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42 Appendix I, A.1).

Discussion

Upon review of both WP 12-FP0060 and WP 12-FP0085, it was determined that the monthly inspection of automatic on-board fire suppression systems is intended to check for mechanical operability and deterioration. The National Fire Protection Association specifies that the semi-annual inspection is for maintenance of the systems.

This change is needed to ensure completeness of the inspection schedule in Attachment E, Table E-1, and to keep the Permit current with routine practices at the facility.

Proposed Revised Permit Text:

**Table E-1
Inspection Schedule/Procedures**

System/Equipment Name	Responsible Organization	Inspection ^a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria ^h
Automatic on-board fire suppression systems	Fire Protection Engineering	<u>Monthly</u> /Semi-annually See List 12	<u>WP 12-FP0085</u> WP 12-FP0060 Inspecting for Mechanical Operability ^m and Deterioration ^b

Item 3

Description

This modification updates Permit Attachment F2, *Training Course and Qualification Card Outlines*, by adding a new training course outline for SAF-502FR, *Live Fire Extinguisher Refresher Training*.

Additionally, this modification updates the course outline for SAF-502F, *Live Fire Extinguisher Training*, in Permit Attachment F2 to define the four elements of the "PASS system" in the course description.

Basis

The addition of the course outline for SAF-502FR is classified as "Changes in the training plan: other changes" and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, B.5.b). This modification does not affect the type or decrease the amount of training personnel receive at the WIPP facility. The type of training is for preparedness and prevention and is an increase in the amount and detail provided in such training.

The change to the course outline for SAF-502F is classified as an "Administrative and informational change" and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42 Appendix I, A.1).

Discussion

The Settlement Agreement and Stipulated Final Order, dated January 22, 2016, HWB-14-21 (CO), Attachment A, *WIPP Corrective Actions and Corrective Action Schedules*, requires the Permittees to submit a Work Plan to NMED for incorporation of live fire training into the Permit. Pursuant to the Work Plan, which was submitted to NMED in the Permittees' response to the Settlement Agreement and Stipulated Final Order on March 18, 2016, the Permittees specified that a Permit Modification Notification to add live fire extinguisher refresher training to the Permit would be submitted to the NMED by October 6, 2017.

This change is needed to satisfy the commitments in the Work Plan submitted to the NMED in accordance with the Settlement Agreement and Stipulated Final Order and to keep the Permit current with routine practices at the facility.

The change to the course outline for SAF-502F is needed to clarify the four elements of the "PASS system," which include: **P**ull the pin; **A**im nozzle at base of the fire; **S**queeze the handle; **S**weep nozzle side to side.

Proposed Revised Permit Text:

ATTACHMENT F2

TRAINING COURSE AND QUALIFICATION CARD OUTLINES

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COURSE: SAF-502F Live Fire Extinguisher Training

DURATION: 4 Hours

PREREQUISITES: None

SCOPE: This course is designed to instruct the trainee in the basic concepts of fire classifications and characteristics, the different types of fire extinguishers, how to properly operate a portable hand-held fire extinguisher, the hazards associated with an incipient stage fire, and when not to fight a fire.

OBJECTIVES: Upon completion of this course, the trainee will have the necessary knowledge and skills to use a portable hand-held fire extinguisher.

Mastery of the terminal objective will be demonstrated by scoring 80% or higher on the written exam, and performing satisfactorily on the Job Performance Measure.

REFRESHER: Biennially

COURSE DESCRIPTION:

1. Classroom Instruction
≈1.5 hours
 - a. Regulations and WIPP procedures
 - b. Define purpose of a fire extinguisher
 - c. Identify different fire classifications and types
 - d. Identify different types of fire extinguishers
 - e. Identify the hazards associated with an incipient fire
 - f. Identify when not to fight a fire
2. Live Fire Practical Participation with Fire Extinguisher
≈1.5 hours
 - a. Demonstrate the operation of a fire extinguisher
 1. Check pressure gauge
 2. Use PASS system (Pull the pin; Aim nozzle at base of the fire; Squeeze the handle; Sweep nozzle side to side)
3. Conclusion with Written Examination
≈1 hour

All times are approximate and do not reflect additional time spent on topics that arise from class participation, student breaks, class size and/or practical exercises.

COURSE: SAF-502FR Live Fire Extinguisher Training Refresher

DURATION: ≈2.5 Hour

PREREQUISITES: SAF-502F

SCOPE: This course is designed to reestablish the knowledge and skill obtained in SAF-502F.

OBJECTIVES: The course will review applicable regulations and procedures, fire classifications and characteristics, incipient stage fire hazards, when not to fight a fire, fire extinguishers types, how to properly operate a portable hand-held fire extinguisher, and a demonstration of fire extinguisher operation.

REFRESHER: Biennially

COURSE DESCRIPTION:

1. eLearn
≈1 hour

- a. Discuss applicable regulations and WIPP procedures
- b. Differentiate fire classifications and types
- c. State the hazards associated with an incipient fire
- d. Recognize when not to fight a fire
- e. Explain the purpose of a fire extinguisher
- f. Identify different fire extinguishers types

2. Live Fire Practical Participation with Fire Extinguisher
≈1.5 hours

- a. Demonstrate the operation of a fire extinguisher
 - 1. Check pressure gauge
 - 2. Use PASS system (Pull the pin; Aim nozzle at base of the fire; Squeeze the handle; Sweep nozzle side to side)

All times are approximate and do not reflect additional time spent on topics that arise from class participation, student breaks, class size and/or practical exercises.