

From: Biswell, David, NMENV
Sent: Monday, February 05, 2018 9:03 AM
To: Allen, Pam, NMENV
Cc: Maestas, Ricardo, NMENV
Subject: FW: Stakeholder Class 2 Permit Modification Meeting Notes 1-08-2018
Attachments: 01-08-2018 Public Meeting WIPP Class 2 Permit Modification.pdf; Public_Notice_Class2_PMR.pdf

From: LucasKamat, Susan, NMENV
Sent: Friday, January 19, 2018 12:19 PM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Cc: Kieling, John, NMENV <john.kieling@state.nm.us>; Biswell, David, NMENV <David.Biswell@state.nm.us>; McLean, Megan, NMENV <Megan.McLean@state.nm.us>; Tellez, Hernesto, NMENV <Hernesto.Tellez@state.nm.us>; Majure, Allison, NMENV <Allison.Majure@state.nm.us>; Borrego, Juan Carlos, NMENV <juancarlos.borrego@state.nm.us>; Hart, Jennifer, NMENV <Jennifer.Hart@state.nm.us>; Goodbar, Andrea, NMENV <Andrea.Goodbar@state.nm.us>
Subject: FW: Stakeholder Class 2 Permit Modification Meeting Notes 1-08-2018

Ricardo,

Please find attached the DOE-OB's notes from the January 8th WIPP Class II PMR Public Stakeholder Meeting in Carlsbad, NM.

Please do not hesitate to contact me, Jennifer, or Andrea with any questions.

Regards,
Susan

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From: Goodbar, Andrea, NMENV
Sent: Friday, January 19, 2018 7:25 AM
To: Hart, Jennifer, NMENV <Jennifer.Hart@state.nm.us>; LucasKamat, Susan, NMENV <Susan.LucasKamat@state.nm.us>
Subject: Stakeholder Class 2 Permit Modification Meeting Notes 1-08-2018

Dear Jennifer:



Please find notes for the 1/08/2017 Public Stakeholders Meeting attached. I have hyperlinked to documents discussed at the meeting and I have included the public meeting notice and the Permit Modification documents which pertain to the meetings.

These documents may be found here:

- P:\Carlsbad WIPP\WPO71 Public Outreach\Meeting Summaries\WIPP Stakeholder

Thank you for the opportunity to represent the NMED at this meeting.

Andrea

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Attendance: Approximately 17

NMED, WIPP Oversight Bureau – Andrea Goodbar
NMED, General Counsel - Jennifer Hower
Department of Energy – George Basabilvazo, Anthony Stone
Nuclear Waste Partners – Karen Day, Bob Kehrman, Rick Chavez, Josh Vajda, Michael Jones, Missy Currier
City of Carlsbad– Kyle Marksteiner, Richard Doss

Katie Roberts
Norbert Rempe

The attendance list for this meeting, was not distributed; copies of the Presentation Power Points and the Public Information Meeting notice were provided.

The following are notes for the Public WIPP Stakeholder meeting held on January 08, 2018 in Carlsbad, New Mexico. The meeting was held at the Skeen Whitlock Building, 4021 National Parks Highway, from 5:00 pm – 7:00 pm. The purpose of the meeting was to provide a review of proposed permit modifications prior to submission and allow for public comment.

The meeting was opened by DOE thanking the attendees, introducing the presenters and stating that public comments would be accepted until February 1st 2018.

Class 2 Permit Modification Request (PMR): Changes Due to Construction and Operation of a New Filter Building:

- Update the description of the Underground Ventilation System and its modes of operation to include the New Filter Building and its associated equipment.
- Revise the Closure Plan to include the decontamination and decommissioning of the existing Interim Ventilation System components that have become radiologically contaminated.
- Revise the WIPP Mine Ventilation Rate Monitoring Plan to remove requirements relative to total mine airflow.
- Modify the Property Protection Area.
- Make changes to the fire-water distribution system, staging areas and evacuation routes, and list of emergency equipment in the RCRA Contingency Plan.

The presenter (Josh Vajda) reviewed the reasons for needed modifications:

The upgraded Underground Ventilation Filtration System will have sufficient ventilation capacity to support simultaneous mine maintenance, mining, and waste emplacement operation and will:

- Provide sufficient airflow to the mine for personnel life-safety requirements
- Direct and filter potentially contaminated air to mitigate the release of airborne contaminants



- incorporate sufficient redundancy to facilitate maintenance outages and filter changes with minimum impact on waste management activities

Modification will document the analysis of new stack location/height on VOC monitoring

Summary of Proposed Changes

- Updates the Underground Ventilation System (UVS) description and Permit text to include the New Filter Building (NFB) and appurtenances, including a Salt Reduction Building (SRB).
- The project includes construction of additional ventilation and filtration as well as eventual decontamination and decommissioning (D&D) of the interim Ventilation System (IVS) that is currently operational
- proposed NFB requires changes to emergency notification communication equipment, staging areas, and emergency equipment inspections.
- Installation of the NFB and its appurtenances require a modification to the property protection area (expanding fence line and additional 10 acres)
- Requirements in Permit attachment O, WIPP Mine Ventilation Rate Monitoring Plan, relative to total mine airflow, which includes equipment related to monitoring total mine flow are proposed for deletion
 - Table 0-1 and references to nominal mine ventilation flow rates are being removed from the permit as total mine flow rates are no longer required to be tracked and reported.
 - the revised and current method for calculating risk to the non-waste surface worker as adjudicated with a Cass 2 PMR approval letter dated January 8, 2016, is based on VOC monitoring results and will prevent the exceedance of the risk levels; therefore, monitoring total mine ventilation flow rate to maintain and report a minimum mine

Figures of the New Filter Building Site Location and the New Filter Building were shown and explained.

Questions:

Norbert Rempe: Can the filtration systems be bypassed in the event of a fire and radiological event at the same time?

Rick Chavez: 540,000 cfm would be maintained through filtration. Filtration can be bypassed if necessary.

Norbert Rempe: Question about cost of the project.

Anthony Stone: That is not relevant to the PMR.

Norbert Rempe: Where is the Risk Assessment (RA) to justify this construction available?

Rick Chaves: The RA used modeling from 2017 to evaluate impacts, updated those models for the new stack height (10 meters)



Norbert Rempe: How did you quantitatively evaluate the impact of radioactivity; what values of radionuclides did you use to evaluate the risk to justify construction?

Rick Chaves: Our focus is on VOC emissions. Radionuclides are not considered for this modification performance criteria.

Norbert Rempe: Wants performance criteria and RAT included so that public may see quantification of risk mitigation to justify the cost.

Josh Vajda: The technical design of the salt reduction building is designed to preserve the longevity of the HEPA filter so it can mitigate radioactive release at a 99.9 % reduction.

Norbert Rempe: Quantitative in terms of what the maximum concentration resulting from release is, in order to justify the cost of the filter building. Is there a fact sheet that explains what the filtration is based on?

George Basabilvaso: Discusses history and location of documents; and offers to provide locations to shareholder.

Norbert Rempe: Requests access to input that was provided by the national labs, regarding the incidents of 2014, that was used to justify the new ventilation system in the documentation to be made available to the public.

Rick Chaves: This permit modification is to address the VOC risk. Nuclide risk was not included in the documentation for this permit modification.

Bob Kherman: The Risk models used for this project are standardized with roots in the national labs more than likely. Basis of air release work conducted by the labs are part of the EPA modeling. The modeling for this project was based on standardized release based models.

Norbert Rempe: Suggested models are subject to bias, may be better to use best available evidence in science, not just existing standards.



Class 2 Permit Modification Request (PMR): Training Program Revision:

- Revise the training program for WIPP facility personnel to more closely align with the applicable requirements of the Resource Conservation and Recovery Act (RCRA) regulations and other hazardous waste facility permits throughout the State of New Mexico.
- Move details associated with training requirements from the Permit to the WIPP facility files.

The changes to the training program plan were discussed, tables of position titles and descriptions were explained, and the CFR requirements for modification were explained.

- The presenter (Karen Day) reviewed the reasons the modifications are needed:
 - Improve efficiency of maintaining the WIPP facility training curriculum current with applicable external regulations and standards (NFPA, MSHA, DOE Orders),
 - Eliminate Permit-specified training for job titles that are not directly related to TRU mixed waste management and/or emergency response,
 - Allow the Permittees to make administrative changes to job titles and description, training curriculum, and qualification cards in a timely manner,
 - Ensure consistency with the Systematic Approach to Training described in the WIPP Training Program, and
 - Relocate Waste Analysis Plan training requirements for non-facility personnel to the appropriate area of the permit.
- Summary of proposed changes
 - Change title of Attachment F from *Personnel Training to Facility Personnel Permit Training Program*
 - Streamline Permit Attachment F by referencing the WIPP Training Program and WIPP facility files as appropriate.
 - Move training requirements specific to the WIPP Waste Analysis Plan for non-facility personnel from Permit attachments F1 and F2 to Attachments C and C7
 - Remove the identification of personnel job titles performing specified inspections from Permit Attachment E, Table E-1 and E-1a
 - Align the Permit training requirements more closely with the regulations of 40 CFR 264 16.d and other hazardous waste facility permits in New Mexico:
 - focus on pertinent facility personnel and training courses for TRU mixed waste and emergency response
 - consolidate specific job titles into general titles
 - maintain the detailed job titles and positions descriptions, etc currently in Permit Attachments F1 and F2 in the WIPP facility files.

Questions:

Norbert Rempe: Question regarding CFR quoted in presentation.



Karen Day: Looked up quote to verify accuracy. It was correctly cited in the presentation.

Norbert Rempe: Comments about level of communication coming from WIPP and minimum response from the public. Questioned the need for public meetings.

Anthony Stone: Public meetings are announced. Comments will be accepted until February 1 2018

Kyle Marksteiner: Asked for clarifying information regarding public comment date.

Anthony Stone: Written Comments will be accepted until February 1 2018.

The meeting ended at 6:15.