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**Department of Energy**  
Carlsbad Field Office  
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Carlsbad, New Mexico 88221

**FEB 01 2018**



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: Comments on the November 29, 2017, Class 2 Permit Modification Request: *Training Program Revision and Changes Due to Construction and Operation of a New Filter Building* for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number NM4890139088-TSDF

Dear Mr. Kieling:

The purpose of this letter is to provide you with the enclosed comments on the Class 2 Permit Modification Request: *Training Program Revision and Changes Due to Construction and Operation of a New Filter Building*, submitted to the New Mexico Environment Department on November 29, 2017.

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  
R. Maestas, NMED                   \*ED  
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**Permittees' Comments on the Class 2 Permit Modification Request (PMR),  
Training Program Revision and Changes Due to Construction and Operation of a  
New Filter Building, Submitted to the NMED on November 29, 2017**

Item 1: Training Program Revision

1. To ensure consistency with the changes proposed to the Permit Attachment E, Tables E-1 and E-1a, in the PMR, an additional revision to Permit Attachment E, Section E-1, *Inspection Schedule*, is necessary. Specifically, the PMR proposes to remove the specific job titles from the Permit Attachment E, Tables E-1 and E-1a; however, the reference to these job titles needs to be removed from the text in Permit Attachment E, Section E-1, *Inspection Schedule*. This additional revision to the Permit is proposed as highlighted below:

E-1 Inspection Schedule

Operational procedures detailing the inspections required under 20.4.1.500 NMAC (incorporating 40 CFR §§264.15(a) and (b)), are maintained in electronic format on the WIPP computer network, in the Operating Record and, as appropriate, in controlled document locations at the WIPP facility. Frequency of inspections is discussed in detail in Section E-1a(2). Inspections are conducted often enough to identify problems in time to correct them before they pose a threat to human health or the environment and are based on regulatory requirements. The operational procedures assign responsibility for conducting the inspection, the frequency of each inspection, the types of problems to be watched for, what to do if items fail inspection, directions on record keeping, and inspector signature, date, and time. The operational procedures are maintained at the WIPP facility. Tables E-1 and E-1a summarize inspections, frequencies, responsible organizations, ~~personnel making the inspection (by job title)~~, and the types of anticipated problems as well as the references for the operational procedures. Inspection records are maintained at the WIPP site for three years. Beginning with the effective date of this Permit, records that are over the three year retention period are either maintained at the WIPP site or transferred to the WIPP Records Archive located in Carlsbad, NM until closure. The records maintained at the WIPP Records Archive are stored in facilities that are temperature and humidity controlled especially for the long term storage of records and readily retrievable and available for inspection.

Item 2: Changes Due to Construction and Operation of a New Filter Building

1. To provide a more accurate value for the increase in the area of the Property Protection Area (PPA) resulting from the construction of the New Filter Building, the Permittees propose a further revision to Permit Attachment A, Section A-3, *Property Description*, as highlighted below:

The WIPP property has been divided into functional areas. The Property Protection Area (PPA), surrounded by a chain-link security fence, which encompasses 34.16 approximately 4044 acres and provides security and protection for all major surface structures. The DOE Off Limits Area encloses the PPA, and is approximately 1,454

acres. These areas define the DOE exclusion zone within which certain items and material are prohibited. The final zone is marked by the WIPP Site Boundary (WIPP Land Withdrawal Area), a 16-section Federal land area under the jurisdiction of the DOE.

2. To provide a more accurate value for the increase in the area of the Property Protection Area (PPA) resulting from the construction of the New Filter Building, the Permittees propose a further revision to Permit Attachment B, *Hazardous Waste Permit Application Part A Appendix B2 Maps*, Figure B2-2a, *Legend to Figure B2-2*, to change NOTE 1 as highlighted below:

**NOTES**












1. The Property Protection Area is a fenced area of approximately 4440 acres. It contains all surface facilities with the exception of salt storage piles, parking lot, landfill and waste water stabilization lagoons.

The revised Figure B2-2a is provided in Attachment 1.

**Attachment 1**

**Revised Figure B2-2a**

## Legend

-  WIPP Site Boundary 10,240 Acres.
-  U.S. DOE Right of Way Number NM-53809. For Waterline, 50 Feet Wide.  
The DOE had Agreed with the City of Carlsbad to Allow the Individuals to Tap this Line Located within the North Access Road Right of Way.
-  Tap Lines Connected to the Main WIPP Waterline.
-  Stock Water Tanks.
-  Southwestern Public Service Company Right of Way Number NM-43203 for Power 60 Feet Wide.
-  General Telephone of the Southwest Right of Way for Telephone Line, 30 Feet Wide, Located within the North Access Road Right of Way.
-  General Telephone of the Southwest Right of Way Number NM-60174 for Telephone Line, 30 Feet Wide, Located within the Railroad Right of Way.
-  U.S. DOE Right of Way Number NM-55675 for North Access Road, 170 Feet Wide.
-  U.S. DOE Right of Way for Access Roads Includes Right of Way Number NM-123703 for the South Access Road, 140 Feet Wide.
-  El Paso Natural Gas Company Right of Way for Gas Pipeline, 30 Feet Wide in Section 16, 50 Feet Wide Elsewhere.
-  U.S. DOE Right of Way Number NM-55699 for Access Railroad, 150 Feet Wide.

## NOTES

1. The Property Protection Area is a fenced area of approximately 44 acres. It contains all surface facilities with the exception of salt storage piles, parking lot, landfill and waste water stabilization lagoons.
2. WIPP Site Boundary (WSB) provides a one mile buffer area around the area available for underground development