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Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

MAR 14 2019

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environmental Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request for Extension of Time to Perform the Annual Recertification Audit for the Idaho National Laboratory Remote Handled Central Characterization Program at an Undetermined Time

Dear Mr. Kieling:

The purpose of this letter is to request an extension of time to perform the Remote Handled (RH) TRU Waste Recertification Audit for the Idaho National Laboratory (INL) Central Characterization Program (CCP) from December 31, 2018 to a future undetermined date. An extension is permissible pursuant to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) Part 1, section 1.10.3. Pursuant to permit Attachment C6, section C-63, "Audits will be conducted at least annually for each site involved in the waste characterization program." The extension, if granted, would direct that the audit be scheduled and completed on a future date.

The INL RH Program currently has minimal funding to perform waste characterization activities, and there is a limited amount of RH waste with which to demonstrate characterization operations. A very limited amount of RH characterization has been completed since the last recertification audit in 2017, but the enhanced Acceptable Knowledge (AK) process has not been completed for any of the RH waste streams. However, a desktop recertification audit will be performed annually on the INL CCP Contact Handled (CH) program.

Once INL CCP RH waste characterization activities resume at the host site location, the Carlsbad Field Office (CBFO) will conduct a full site specific audit as a basis for reinstating authority to perform RH waste characterization activities and reestablishment of RH waste shipments from the INL site to the WIPP.

The audit will evaluate INL/CCP program updates put in place to account for reactivation of the RH waste characterization program and to ensure compliance with the WIPP HWFP, NM 489013088-TSDF requirements that may have changed since the suspension of the RH INL/CCP program.

This extension will allow CBFO to focus assessment efforts on active programs and allow for evaluation of the RH INL/CCP program once updates are finalized and determined ready for implementation.

Should you have any questions concerning this notification, please contact Mr. Kenneth Princen, Assistant Manager, CBFO Office of the National TRU Program at (575) 234-7053.

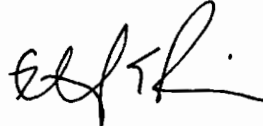


Mr. John E. Kieling

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MAR 14 2019

Sincerely,



Kenneth E. Princen
Assistant Manager
Office of the National TRU Program

cc:

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T. Carver, CBFO	ED	G. White, CTAC	ED
H. Cruickshank, CBFO	ED	Site Documents	ED
C. Fesmire, CBFO	ED	RCRA Chronology Record	ED
D. Standiford, CBFO	ED	WIPP Operating Record	ED
A. Stone, CBFO	ED	WWIS Database Administrators	ED
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