



 ENTERED

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

JUL - 1 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

Reference: Carlsbad Field Office letter CBFO:ONTP:KEP:RMS:19-1205:UFC 5900.00; dated March 22, 2019, submitted to Mr. John E. Kieling from Kenneth E. Princen; subject: CBFO ONTP Withdrawal of the 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) Transuranic (TRU) Waste Annual Recertification Audit required by Permit Attachment C6, Section C6-3, for the Idaho National Laboratory (INL) Central Characterization Program (CCP). The new date for this audit is undetermined at this time. Shipments of RH TRU mixed waste were suspended from INL in 2014 and have not resumed. Because waste at INL is currently packaged in a way that can only be shipped in removable lid canisters and RH waste is not being emplaced in boreholes in Panel 7, there are no near-term plans to resume shipments of RH TRU mixed waste from INL. This extension is requested pursuant to the Permit Part 1, Section 1.10.3. The Permit in Attachment C6, Section C6-3 states that "Audits will be conducted at least annually for each site involved in the waste characterization program." This letter replaces the previous extension of time request that was withdrawn, pursuant to the referenced letter.

Because there are no near-term plans to resume shipments of RH TRU mixed waste from INL, the INL CCP RH program has been suspended and only limited characterization activities are being performed. Because of this, there is a limited amount of RH TRU mixed waste available with which to demonstrate characterization operations and therefore annual audits are not feasible.

Prior to resumption of shipments of RH TRU mixed waste from INL, the Carlsbad Field Office (CBFO) will conduct a full audit pursuant to the Permit Part 2, Section 2.3.2.1 as a basis for authorizing RH TRU mixed waste shipments from the INL site to the Waste Isolation Pilot Plant (WIPP) facility.


I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my 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 my knowledge and belief, true, accurate, and complete. I am



aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

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

Sincerely,


for Todd Shrader, Manager
Carlsbad Field Office

cc:

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|----------------------|------|-------------------------------------|----|
| K. Lachman, CBFO | * ED | A. Johnson, NWP | ED |
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| M. Brown, CBFO | ED | M. Percy, NWP | ED |
| C. Gadbury, CBFO | ED | M. Ramirez, NWP | ED |
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| D. Standiford, CBFO | ED | G. White, CTAC | ED |
| A. Stone, CBFO | ED | Site Documents | ED |
| A. Walker, CBFO | ED | RCRA Chronology Record | ED |
| R. Gill, CBFO | ED | WIPP Operating Record | ED |
| V. Ballew, NWP | ED | WWIS Database Administrators | ED |
| J. Carter, NWP | ED | CBFO M&RC | |
| J. Harvill, NWP | ED | *ED denotes electronic distribution | |
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