



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
DEC 17 2019



Mr. Dave Cobrain, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Update for the WIPP Operating Record (*Change Notice #5*) *First/Second Stage Sludge, BNINW216, Revision 1*

Dear Mr. Cobrain:

The Department of Energy, Carlsbad Field Office has approved the *Update for the Waste Isolation Pilot Program (WIPP) Operating Record (Change Notice #5) for Waste Stream Profile Form Number BNINW216, Revision 1, First Second Stage Sludge, at Advanced Mixed Waste Treatment Project (AMWTP)*. Enclosed is a copy of the Change Notice (and associated WSPF).

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 fine and imprisonment for knowing violations.

If you have any questions, please contact Mr. Kenneth E. Princen, Assistant Manager of the National TRU Program, at (575) 234-7053.

Sincerely,

Gregory Sosson,
Acting Manager
Carlsbad Field Office

Enclosure

cc: w/enclosure
R. Maestas, NMED * ED
D. Biswell, NMED ED
M. McLean, NMED ED
RCRA Chronology ED
WIPP Operating Record ED
CBFO M&RC
*ED denotes electronic distribution



**Update for WIPP Operating Record (Change Notice 5)
First/Second Stage Sludge (BNINW216, Rev. 1)**

Please add the following information to the WIPP Operating Record for Waste Stream Profile Form (WSPF) BNINW216, Revision 1. This waste stream is First/Second Stage Sludge and was approved by DOE CBFO on September 17, 2004. Change Notice 1 was approved on February 2, 2005. Change Notice 2 was approved on January 24, 2007. Change Notice 3 was approved on April 2, 2008. Change notice 4 was approved on August 6, 2010.

The WSPF is being revised. The WSPF form number was changed from Form-1195 to FRM-1996 on December 5, 2016 and the current revision of the form is July 31, 2018. Therefore, this change notice reflects the current form number.

Changes to the WSPF and AK Summary are itemized and bolded as follows:

1. **WSPF FRM-1996, Technical contact and Technical contact phone number**
Update the technical contact to Gina Tedford. Update the technical contact phone number to (208) 533-6449.
2. **WSPF FRM-1996, Date(s) of audit report approval by NMED**
Revise NMED audit approval dates to include 1/25/11, 5/1/12, 9/10/13, 1/27/2014, and 12/28/2017.
3. **WSPF FRM-1996, Title, version number, and date of documents use for WAP certification**
Update the following documents to reflect current title, version and date:
AMWTP CH TRU Waste Certification Plan, PLN-5198, Rev. 3, 12/03/2018
CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC),
CCP-PO-003, Rev. 15, 3/18/2019
Quality Assurance Project Plan, PLN-5199, Rev. 2, 7/31/2018
4. **WSPF FRM-1996, Waste Stream Information, Description from the ATWIR**
Change the description as follows:
See RPT-TRUW-09, section 1.2.10.
5. **WSPF FRM-1996, Waste Stream Information, Number of SWBs**
Update the number of SWBs from 1 to 4.
6. **WSPF FRM-1996, Applicable TRUCON Codes**
Update the applicable TRUCON codes to ID111/ID211, ID127/ID227.

7. WSPF FRM-1996, Acceptable Knowledge Information, Required Program Information

Update the required program information to reflect current WSPF format and references, as follows:

Map of Site: Reference nos. 1 and 2.

Facility mission description: Reference nos. 1 and 3.

Description of operations that generate waste: Reference nos. 1 and 8.

Waste identification/categorization schemes: Reference nos. 4 and 9.

Types and quantities of waste generated: Reference nos. 1, 3, 5, 6 and 8.

Correlation of waste streams generated from the same building and process, as appropriate: Reference no. 1.

Waste certification procedures: Reference nos. 7, 8, 12, 13, 14 and 17.

8. WSPF FRM-1996, Acceptable Knowledge Information, Required Waste Stream Information

Update the required waste stream information to reflect current WSPF format and references, as follows:

Area(s) and building (s) from which the waste stream was generated: Reference nos. 1 and 8.

Waste stream volume and time period of generation: Reference nos. 1, 8 and 16.

Waste generating process description for each building: Reference nos. 1 and 8.

Documentation regarding how site has historically managed the waste: Reference nos. 1, 5 and 8.

Process flow diagrams: Reference nos. 1 and 8.

Material inputs or other information identifying chemical/radionuclide content and physical waste form: Reference nos. 1, 8 and 16.

Waste Material Parameter Weight Estimates per unit of waste: Reference nos. 1 and 8.

9. WSPF FRM-1996, Additional Acceptable Knowledge Documentation

Update the additional acceptable knowledge documentation to reflect current WSPF format and references, as follows:

Process design documents: Reference no. 1.

Standard operating procedures: Reference nos. 1 and 8.

Safety Analysis Reports: Reference no. 1.

Waste packaging records: Reference nos. 1 and 8.

Test plans/research project reports: Reference no. 1.

Site databases: Reference nos. 1, 5 and 8.

Information from site personnel: Reference no. 1.

Standard industry documents: Reference no. 1.

Analytical data relevant to the waste stream: Reference nos. 1, 8 and 16.

Material safety data sheets: Reference nos. 1 and 8.

Sampling and analysis data from comparable/surrogate waste streams: Reference no. 1.

Laboratory notebooks: Reference nos. 1 and 8.

10. WSPF FRM-1996, Characterization Information

Update the characterization to reflect current WSPF format as follows:

Radiography: Reference no. 10.

Visual Examination: Reference no. 11.

11. WSPF FRM-1966, Waste Stream Profile Continuation Sheet, References

Update the following documents to reflect current title, revision number and revision date:

1. Acceptable Knowledge Document for INL Stored Transuranic Waste – Rocky Flats Plant Waste, RPT-TRUW-56, Rev. 8, December 19, 2018.
2. Advanced Mixed Waste Treatment Project Area Map, drawing number 623403, November 26, 2003.
3. Acceptable Knowledge Document for AMWTP Waste, RPT-TRUW-06, Rev. 18, March 28, 2016.
4. AMWTP Waste Stream Designations, RPT-TRUW-12, Rev. 25, June 5, 2019.
7. AMWTP CH TRU Waste Certification Plan, PLN-5198, Rev. 3, 12/03/18

8. Acceptable Knowledge Summary for First/Second Stage Sludge (BNINW216), RPT-TRUW-09, Rev. 11, July 30, 2019.
10. Real Time Radiography Examinations, TPR-8086, Rev. 3, January 30, 2018.
11. Non-Facility Visual Examination Operations, TPR-8103, Rev. 4, June 11, 2019.
12. Request for the Review and Approval of AMWTP Audit Reports, Department of Energy, Carlsbad Field Office from Todd Schrader, Manager, to John, E. Kieling, Chief, New Mexico Waste Bureau, CBFO:OQA:MNP:BA:17-2622:UFC:2300.00, December 20, 2017.
13. Waste Isolation Pilot Plant Hazardous Waste Facility Permit, New Mexico Environment Department, NM4890139088-TSDF, Current version.
14. Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant, U. S. Department of Energy, Carlsbad Field Office, Waste Isolation Pilot Plant, DOE/WIPP 02-3122, Rev. 9, October 18, 2018.
15. Review of Update for the WIPP Operating Record (Change Notice #4) First and Second Stage Sludge (BNINW216, Rev. 1), CBFO, August 6, 2010.
17. NMED Approval of the Advanced Mixed Waste Treatment Project Final Audit Reports, Audit A-15-01, A-16-01, and A-17-04 Waste Isolation Pilot Plant EPA I.D. Number *NM4890139088*, Letter from John E. Kieling to Todd Shrader, Manager Carlsbad Field Office and Bruce C. Covert, Project Manager, Nuclear Waste Partnership LLC, Dated December 28, 2017.

12. AK Summary, Acceptable Knowledge Summary for First/Second Stage Sludge (BNINW216), RPT-TRUW-09.

Replace revision 7 of RPT-TRUW-09 with revision 11.

Reason/Justification for Changes

Item 1.

The Technical Contact and Technical contact phone number have been updated to reflect current information.

Item 2.

The date of audit report approval by NMED has been updated to reflect all audit report approval dates.

Item 3.

Documents used for WAP certification were revised to reflect the most recent revisions.

Item 4.

The description from the ATWIR has been updated to reflect the correct section of RPT-TRUW-09.

Item 5.

The number of SWBs is updated to represent the current BNINW216 waste stream inventory.

Item 6.

The applicable TRUCON content codes have been updated to reflect current WAC requirements as provided by the payload engineers.

Item 7.

The required program information has been updated to reflect current WSPF format and references.

Item 8.

The required waste stream information has been updated to reflect current WSPF format and references.

Item 9.

The additional acceptable knowledge documentation has been updated to reflect current WSPF format.

Item 10.

The additional acceptable knowledge documentation has been updated to reflect current WSPF format.

Item 11.

The waste stream profile continuation sheet, references, has been updated to reflect current title, revision number and revision date.

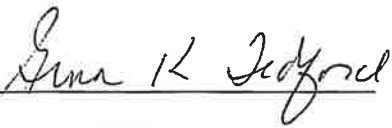
Item 12.

The AK Summary Report, Acceptable Knowledge Summary for First/Second Stage Sludge (BNINW216), RPT-TRUW-09, has been updated to include Fluor standard formatting, editorial corrections, CBFO review comments, and enhanced AK information.

Update for the WIPP Operating Record (BNINW216, Rev. 1) Certification

The changes submitted in this change notice do not affect the waste stream designation, assignment of EPA hazardous waste numbers, or the waste matrix code assigned to the previously approved BNINW216, Rev. 1 waste stream profile form.

I hereby certify that I have reviewed this Update for WIPP Operating Record, and it is complete and accurate to the best of my knowledge. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

	Gina Tedford, SPM	4-16-19
Signature of SPM	Printed Name and Title	Date

WASTE STREAM PROFILE FORM

Signature/Date

Implementing Document: WIP-4, WIP-7

Waste Stream Profile Number: (1) BNINW216, Rev. 1

Generator site name: Advanced Mixed Waste Treatment Project Technical contact: (2) Gina Tedford

Generator site EPA ID: ID4890008952 Technical contact phone number: (2) 208-533-6449

Date(s) of audit report approval by NMED: (3) 12/23/2003, 7/02/2004, 4/29/2005 (revised 5/3/2005), 6/16/2006, 1/23/2007, 1/18/2008, 1/9/2009, 1/8/2010, 1/25/2011, 5/1/2012, 9/10/2013, 1/27/2014, 12/28/2017

(4) AMWTP CH TRU Waste Certification Plan, PLN-5198, Rev. 3, 12/03/2018; CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC), CCP-PO-003, Rev. 15, 3/18/19; Quality Assurance Project Plan, PLN-5199, Rev. 2, 07/31/2018

Title, version number, and date of documents used for WAP certification:

Did your facility generate this waste? Yes No If no, provide the name and EPA ID of the original generator:

(5) Rocky Flats Environmental Technology Site, EPA ID CO7890010526IN-BNINW216

Waste Stream Information

WIPP ID: (6) IN-BNINW216 Summary Category Group: (7) S3000

(8) Inorganic Homogeneous

Waste Matrix Code Group: Solids Waste Stream Name: (9) First/Second Stage Sludge

Description from the ATWIR (10) See RPT-TRUW-09, section 1.2.10

Defense TRU Waste: (11) Yes No Check One: CH RH

Number of SWBs (12) 4 Number of Drums (12) 22,304 Number of Canisters (12) 0

Batch Data report numbers supporting this waste stream characterization: (13) See Characterization Information Summary Report, Table 5

List applicable EPA Hazardous Waste Numbers:² (14) D004, D005, D006, D007, D008, D009, D010, D011, D022, F001, F002, F003, F005, F006, F007, F009

Applicable TRUCON Content Codes: (15) ID111/ID211, ID127/ID227

Acceptable Knowledge Information¹

(For the following, enter the supporting documentation used [i.e., references and dates]) (16) See attached list of references.

Required Program Information

Map of site: (17) Reference nos. 1 and 2.

Facility mission description: (17) Reference nos. 1 and 3.

Description of operations that generate waste: (17) Reference nos. 1 and 8.

Waste identification/categorization schemes: (17) Reference nos. 4 and 9.

Types and quantities of waste generated: (17) Reference nos. 1, 3, 5, 6 and 8.

Correlation of waste streams generated from the same building and process, as appropriate: (17) Reference no. 1.

Waste certification procedures: (18) Reference nos. 7, 8, 12, 13, 14 and 17.

Required Waste Stream Information

Area(s) and building(s) from which the waste stream was generated: (19) Reference nos. 1 and 8.

Waste stream volume and time period of generation: (19) Reference nos. 1, 8 and 16.

Waste generating process description for each building: (19) Reference nos. 1 and 8.

Documentation regarding how site has historically managed the waste: (19) Reference nos. 1, 5 and 8.

WASTE STREAM PROFILE FORM

Signature/Date

Process flow diagrams: (19) Reference nos. 1 and 8.

Material inputs or other information identifying chemical/radionuclide content and physical waste form: (19) Reference nos. 1, 8 and 16.

Waste Material Parameter Weight Estimates per unit of waste (20) Reference nos. 1 and 8.

Which Defense Activity generated the waste: (check all that apply) (21) Reference no. 8.

- Weapons activities including defense inertial confinement fusion
- Verification and control technology
- Defense nuclear waste and material by-products management
- Defense nuclear waste and materials security and safeguards and security investigations
- Naval Reactors development
- Defense research and development
- Defense nuclear materials production

Additional Acceptable Knowledge Documentation

Process design documents: (22) Reference no. 1.

Standard operating procedures: (22) Reference nos. 1 and 8.

Safety Analysis Reports: (22) Reference no. 1.

Waste packaging records: (22) Reference nos. 1 and 8.

Test plans/research project reports: (22) Reference no. 1.

Site databases: (22) Reference nos. 1, 5 and 8.

Information from site personnel: (22) Reference no. 1.

Standard industry documents: (22) Reference no. 1.

Analytical data relevant to the waste stream: (22) Reference nos. 1, 8 and 16.

Material safety data sheets: (22) Reference nos. 1 and 8.

Sampling and analysis data from comparable/surrogate waste streams: (22) Reference no. 1.

Laboratory notebooks: (22) Reference nos. 1 and 8.

Characterization Information²

For the following, when applicable, enter procedure title(s), number(s) and date(s) (16)

Radiography: (23) Reference no. 10.

Visual Examination: (23) Reference no. 11.

Waste Stream Profile Form Certification:

I hereby certify that I have reviewed the information in this Waste Stream Profile Form, and it is complete and accurate to the best of my knowledge. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

(24) Gina K Tedford Gina Tedford 9-16-19
 Signature of Site Project Manager Printed Name Date

- NOTE:** (1) Use back of sheet or continuation sheets, if required.
 (2) If radiography, visual examination were used to determine EPA Hazardous Waste Codes, attach signed Characterization Information Summary documenting this determination.

Reference List

1. Acceptable Knowledge Document for INL Stored Transuranic Waste – Rocky Flats Plant Waste, RPT-TRUW-56, Rev. 8, December 19, 2018.
2. Advanced Mixed Waste Treatment Project Area Map, drawing number 623403, November 26, 2003.
3. Acceptable Knowledge Document for AMWTP Waste, RPT-TRUW-06, Rev. 18, March 28, 2016.
4. AMWTP Waste Stream Designations, RPT-TRUW-12, Rev. 25, June 5, 2019.
5. Estimated Earthen and Geofabric Covered TRU Waste Inventory in the TSA at Radioactive Waste Management Complex (RWMC), RWMC EDF-837, August 24, 1995
6. Container Inventory Report for WMF-629 thru WMF-633 (TRIPS query), December 24, 2002.
7. AMWTP CH TRU Waste Certification Plan, PLN-5198, Rev. 3, 12/03/18
8. Acceptable Knowledge Summary for First/Second Stage Sludge (BNINW216), RPT-TRUW-09, Rev. 11, July 30, 2019.
9. Identification of Defense Waste Streams Generated at Rocky Flats Environmental Technology Site (RFETS), U. S. Department of Energy memorandum from G. E. Dials to Jessie M. Roberson and John M. Wilcynski, May 20, 1997.
10. Real Time Radiography Examinations, TPR-8086, Rev. 3, January 30, 2018.
11. Non-Facility Visual Examination Operations, TPR-8103, Rev. 4, June 11, 2019.
12. Request for the Review and Approval of AMWTP Audit Reports, Department of Energy, Carlsbad Field Office from Todd Schrader, Manager, to John, E. Kieling, Chief, New Mexico Waste Bureau, CBFO:OQA:MNP:BA:17-2622:UFC:2300.00, December 20, 2017.
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15. Review of Update for the WIPP Operating Record (Change Notice #4) First and Second Stage Sludge (BNINW216, Rev. 1), CBFO, August 6, 2010.
16. Hazardous Waste Code Determination for First/Second Stage Sludge Waste Stream (IDCs 001, 002, 800), INEEL/EXT-01-00015, Rev. 2, May 2001.
17. NMED Approval of the Advanced Mixed Waste Treatment Project Final Audit Reports, Audit A-15-01, A-16-01, and A-17-04 Waste Isolation Pilot Plant EPA I.D. Number NM4890139088, Letter from John E. Kieling to Todd Shrader, Manager Carlsbad Field Office and Bruce C. Covert, Project Manager, Nuclear Waste Partnership LLC, Dated December 28, 2017.