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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
March 3, 2020



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

Subject: Request for an Extension of Time to Complete Hazardous Waste Facility Permit Inspections during a Planned Electrical Outage at the Waste Isolation Pilot Plant Facility, Hazardous Waste Facility Permit Number NM4890139088-TSDF

Dear Mr. Pierard:

The purpose of this letter is to request a seven-day extension of time for completion of certain Hazardous Waste Facility Permit (Permit)-specified inspections at the Waste Isolation Pilot Plant (WIPP) facility.

Permit Part 2, Section 2.7.3., *Inspection Frequency* requires that monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment be inspected at the frequency specified in Permit Attachment E, *Inspection Schedule, Process and Forms*.

As part of the ongoing maintenance outage, which started on February 14, 2020, there is a planned main electrical outage scheduled for March 9 – 13, 2020, (Monday – Friday). During this time, due to safety concerns, there will be restrictions to the number of personnel allowed at the WIPP facility. It is anticipated the WIPP facility will return to normal operating status late in the afternoon of March 14, 2020, (Saturday).

The Permittees request a seven-day extension to the Permit-specified inspections of systems and equipment listed below in Table 1 for the following reasons:

- Qualified personnel responsible for performing the inspections will not be able to access the equipment/system due to the electrical outage. During the electrical outage, the WIPP facility will maintain a heightened safety awareness by allowing on site only those personnel directly supporting the maintenance outage work in addition to essential personnel (e.g., firefighters, security guards).
- No personnel will be allowed underground during the electrical outage. Once the power is restored, access will be granted to those personnel who are tasked with ensuring the mine is safe to resume normal operating status.

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Table 1. Extension of Permit-specified Inspections of Systems and Equipment

System/Equipment Name	Inspection Frequency	Comment/Compensatory Measures
Uninterruptible Power Supply (Central UPS)	Daily	There will be Firefighters at the WIPP facility during the electrical outage. When facility electrical power is restored, the daily inspections will resume.
MSHA Air Quality Monitor	Daily	No personnel in the underground during the electrical outage. When the mine returns to normal operating status, the daily inspections will resume.
Eye Wash and Shower Equipment	Weekly	Work will not be performed in those areas where eye wash and safety shower equipment are not inspected.
Fire Pumps	Weekly	There is no waste in the Waste Handling Building Container Storage Unit. A portable generator will be staged near the electric fire water pump should it be needed. Fire watches will be established, and the on-site Fire Department will be staffed.
Underground Openings-Roof Bolts and Travel ways	Weekly	No personnel in the underground during the electrical outage. When the mine returns to normal operating status, the weekly inspections will resume.

Should there be a delay in restoring the mine to normal operating status, there may be other planned weekly underground Permit-specified inspections which may not be completed. If this occurs, the reason for not completing the inspection will be recorded on the Inspection Sheet along with any compensatory measures put in place.

The extension does not reduce the ability of the Permittees to provide continued protection to human health and the environment at the WIPP facility. This request is being made pursuant to the Permit Part 1, Section 1.10.3., *Extension of Time*. Your timely response to this letter is appreciated.

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 regarding this notification, please call Mr. Michael R. Brown at (575) 234-7476.

Sincerely,



Gregory Sosson
Acting Manager
Carlsbad Field Office



for Sean Dunagan
President and Project Manager
Nuclear Waste Partnership LLC

cc:

R. Maestas, NMED * ED
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*ED denotes electronic distribution