

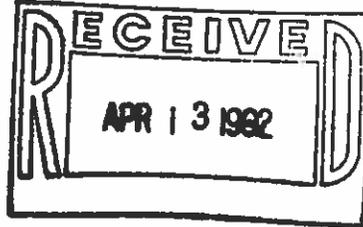


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March 19, 1992

Mr. Arlen Hunt
Project Manager
WIPP Project Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221

RE: Quality Assurance Program Plan Certification of CH-TRU Waste
WHC-SD-WM-QAPP-005, Revision 0



Dear Mr. Hunt:

Herein please find comments by the New Mexico Environment Department (NMED) on the above-listed document.

GENERAL

The title should reflect that the document pertains to the Hanford Site.

As with other WIPP quality assurance documents, considerations should be made of RCRA regulatory requirements. If these considerations are made by the waste generator rather than WIPP, perhaps it would avoid having to back-track from WIPP.

SPECIFIC

Page 15. Section 12.4. The statement is made that "Where no nationally recognized standard exists, the basis for calibration and subsequent development of a standard is documented." What wastes, either hazardous or radioactive, are being used at the Hanford Site that do not already have a recognized standard?

Page 17. Section 17.0 Quality Assurance Records. Record retention policy should require extending the retention period when records are involved in enforcement action. An example in New Mexico is the New Mexico Hazardous Waste Regulations (HWMR-6), which requires that records be kept a minimum of three years, but that period is automatically extended during the course of any unresolved enforcement action (HWMR-6, Part III, 40 CFR section 262.40(d), Pt. V, sec. 264.74(b), Pt. VI, 265.74(b)). Several of the retention periods listed in Section 17.0 and Table 1, page 19 are long and would likely meet any retention requirements without additional retention option clauses. However, some retention periods may be

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too short; i.e., "do not require retention beyond the next WACCC audit" (audits are done annually); "for three years; and "until waste is emplaced at the WIPP facility". Hopefully enforcement actions will not take three years, but they can and have. Also, why call a retention period lifetime when it is not a lifetime? The footnotes to Table 1 qualify lifetime as "until emplacement at WIPP and a minimum of 25 years". For current waste, once WIPP is operational, the emplacement period could be fairly short.

Appendix A: Document References, page A-2. There are no references to EPA documents such as 40 CFR or SW-846. Perhaps, some of these references do, in turn, reference EPA documents. If these are the documents that must be followed to ensure compliance, there should be some mention of EPA documents.

Figure 1: Figure 1 is confusing. Do all the Directors report directly to the Executive Vice President? Is anyone under the Vice Presidents? Are Directors equal in authority to the Vice Presidents? Although Figure 2 uses the same format, it is less confusing because of an additional horizontal line showing that in addition to command of the second line units, ESH & QA also has direct-line command of the Waste Tank ESH & QA and E6Q units.

Thank you for the opportunity to comment.

Sincerely,



Kathleen M. Sisneros, Director
Waste and Waste Management

KMS:GJG:EG

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