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**Westinghouse  
Electric Corporation**

**Government Operations**

**WD:92:01075**

Waste Isolation Division

Box 2078  
Carlsbad NM 88221

**June 23, 1992**

Dr. J. A. Mewhinney, Program Manager  
Environment, Safety and Health  
U. S. Department of Energy  
WIPP Project Site Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221-3090



**Subject: RESPONSE TO NEW MEXICO ENVIRONMENT DEPARTMENT'S REQUEST  
FOR ADDITIONAL DOCUMENTATION ON THE PART B PERMIT  
APPLICATION**

Dear Dr. Mewhinney:

Mr. D. Mercer of WPIO and Mr. R. Kehrman met with the New Mexico Environment Department (NMED) on May 26, 1992, in Santa Fe to discuss the professional engineer certification requirements. Attachment A is a brief summary of the meeting. This letter transmits documentation for your use in fulfilling requests by NMED for additional information.

Attachment B is the WIPP Configuration Management System description. This system description explains how the DOE controls the facility configuration, including drawings, and assures sufficient analysis and independent reviews of all changes that affect facility safety.

Attachment C is a set of Engineering Change Orders (ECOs), with notes on drawings and the ECOs. Included are all the ECOs that post date the Brookhaven review cutoff date of June 15, 1989. Most of these ECOs have already been incorporated into the drawings previously submitted to NMED in the revised Part B Application. These are provided to help the NMED understand how the WIPP configuration control system impacts drawings. Brief change histories to some of the drawings are included in this attachment.

Also included in Attachment C are changes that have been made to the drawings since the March, 1992, submittal of the Part B Revision. As you can see from the ECOs, all of these changes are insignificant from a facility safety and environmental protection standpoint. They are significant, however, from the standpoint of keeping the facility configuration current and accurate as required by DOE Orders.

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As part of the configuration Management System, all ECOs were considered for impacts on the Final Safety Analysis Report (FSAR). If a cognizant engineer believes an ECO will affect the FSAR, he submits it to the Environment, Safety and Health (ES&H) Department for review. If ES&H determines additional safety analysis is required then the proposed engineering change cannot be made until the analysis is performed and the proper reviews, including independent reviews have been completed. None of the changes included with this letter raised any unreviewed safety questions requiring an assessment by DOE's independent contractor.

Drawing 31-R-001-01D that NMED found stamped "For Information Only" in the Revised Part B Application (March 4, 1992) had that stamp because it was supplied as a reference drawing to the contractor who did shaft outfitting. The drawing was not stamped when the shaft construction contractor used it. ECO 6250 was written to eliminate the stamp and is provided for NMED to attach to their copies of that drawing.

Attachment D contains the two volumes of the Operational Readiness Review Main Report and the Addendum, both dated Summer, 1991. These reports document further independent review of the WIPP facility by the DOE and its contractor, Brookhaven.

The WID recommends that your office schedule a meeting with the NMED and their technical review contractor so that WIPP can present this material firsthand, rather than mailing it to the NMED. The WID also recommends that the NMED and appropriate technical contractor personnel be invited down to the WIPP site for a tour and specific educational contacts with our Engineering personnel on critical systems.

Please contact Bob Kehrman at 887-8287 if you have any questions or need additional information.

Sincerely,

*P. C. WEDDLE by [Signature]*

P. C. Weddle, Manager  
Project Management and Regulatory Assurance

JEJ:se

Attachments

cc: H. M. Greenwood, WPSO  
D. D. Mercer, WPIO

RA:92:0338

