

ENTERED

TENTATIVE SCHEDULE

Kickoff Meeting with DOE

Date: 7/16/92

Site Visit

Date: 7/30²⁹³/92 at Carlsbad

Chapter B

- 7/27/92: NODs and Agenda to DOE
- 7/31/92: Meeting to Discuss Chapter B NODs
- 7/31/92 to 8/14/92: Six-week interactive period
- 8/14/92: Stop Date for DOE responses

Chapter C

- 8/10/92: NODs and Agenda to DOE
- 8/13/92: Meeting to Discuss Chapter C NODs
- 8/31/92 to 9/18/92: Six-week interactive period
- 9/18/92: Stop Date for DOE responses

Chapters D and I

- 8/31/92: NODs and Agenda to DOE
- 9/3/92: Meeting to Discuss Chapters D and I
NODs (possible follow-up meeting on 9/24)
- 9/3/92-10/16/92: Six-week interactive period
- 10/16/92: Stop Date for DOE responses

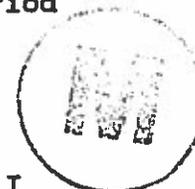
Chapter E

- 9/21/92: NODs and Agenda to DOE
- 9/24/92: Meeting to Discuss Chapter E NODs
- 9/24/92 to 10/23/92: Four-week interactive period
- 10/23/92: Stop Date for DOE responses

All Remaining Chapters

- 10/5/92: NODs and Agenda to NMED
- 10/8/92: Meeting with State/DOE,
- 10/8/92 to 11/13/92: Four-week interactive period
- 11/13/92: Stop Date for DOE responses

Next meeting here 29-30
for 29
Discuss Ch B NOD's on 32



920706



TRIP REPORT

C & C
FILE

DATE: July 16, 1992

LOCATION: Santa Fe, NM

ORGANIZATION: New Mexico Environment Department (NMED)

PURPOSE: Meet with A. T. Kearney to discuss progress on the review of the WIPP Part B.

PARTICIPANTS: See Attachment 1

SUMMARY:

This was the first of the bi-weekly meetings that the NMED has requested to facilitate the review of the WIPP Resource Conservation and Recovery Act (RCRA) Part B application. Benito Garcia initiated the meeting by introducing Susan Collins who will be the staff permit writer. An agenda was passed out for the meeting and is included as Attachment B. The entire meeting was tape recorded for the administrative record.

- C & C
- PRC
- Anderson
- Carrell
- Cox
- Kuntz
- Lee
- Mugno
- Reed
- Trego
- Weddle
- Conway
- _____
- _____
- _____
- _____
- _____

A. T. Kearney (ATK) passed out a tentative schedule for the review of the permit application. This schedule is included as Attachment C. The next meeting will be on July 29-30, 1992 in Carlsbad. The first day will be devoted to a tour of the facility and the second day will include discussions of notices of deficiencies (NODs) for Chapter B of the application. In general, the schedule allows for a four to six week period for interaction between the DOE and the NMED to resolve questions. NMED will try to identify all questions prior to the beginning of the interaction period, however, they pointed out that additional questions may arise during the discussion.



DOE asked that correspondence be sent to Mr. H. M. Greenwood with a carbon copy to Mr. R. F. Kehrman. DOE will send correspondence to Mr. B. Garcia with a carbon copy to Ms. S. Collins. If a document is requested, DOE is to send one copy directly to ATK. DOE identified either Mr. Greenwood or Mr. G. Venable as the DOE point of contact. If they cannot be reached, Mr. Kehrman should be contacted. Substantive telephone conversations should be recorded in a telephone log. All meetings will be in the NMED Santa Fe offices except the next meeting which is in Carlsbad.



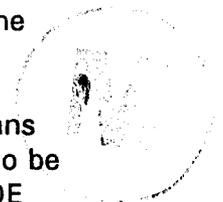
After the discussion of protocols, ATK provided the DOE with the results of their initial read-through of the Part B. Comments were topical in nature and were not passed out in written form. NMED pointed out that ATK concerns may not necessarily be NMED concerns and that all official NOD's will come from NMED. The following are a summary of the ATK comments:

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RECORD

1 of 6

- 1) Unit Boundary--ATK will take a close look at the way the unit boundary is defined in the application relative to the requirements in Subpart X of 40 CFR 264.
- 2) Units requiring permitting--Specifically, ATK will look at what activities/facilities at the WIPP require a permit. They will determine if a permit is needed for the above ground activities since the miscellaneous unit is described in the application as the underground facility. They will take a close look at permit requirements for derived waste and management of waste from a spill. Mr. R. Kehrman provided some clarification of the application with regard to this point. This clarification included the rationale for the term "derived" waste, and an explanation that DOE has included Subpart I, Container Management Requirements in the application to cover activities not specifically in the miscellaneous unit.
- 3) Referencing--ATK will look at the way DOE has referenced documents to see what should be included in the permit.
- 4) Unit Design Requirements--ATK will be very flexible in examining the applicable requirements to the regulated unit. They are looking at other portions of RCRA to see if they apply. They would not discuss what specific portions of RCRA they are looking at. Presumably they could include any portions from Subpart J to Subpart BB. Many of these, if not all, clearly do not apply to the WIPP facility. It was pointed out by the DOE that applying other portions of RCRA could have significant implications.
- 5) Storage of Waste Generated During the Test Phase--ATK would like to know where in the underground derived waste may be placed.
- 6) Final Disposition of the Waste--There are some gaps in the application with regard to the retrieval and final disposition of the waste.
- 7) Test Phase Plans--ATK will take a look at the Test Phase plans and purposes and see how these plans agree with the activity to be permitted. The permit will lock the DOE into specific tests. DOE pointed out that because the Test Phase was a research and development program, DOE would seek as much flexibility as is allowed under RCRA.
- 8) Management of Site Generated Waste--ATK will have some questions in this area.
- 9) Release Detection--ATK is not sure of the validity of the assumption made by the DOE that hazardous constituent detection is detectable by virtue of the radioactivity in the waste. Not all releases may be co-detectable.



10) Other Regulations--ATK will look at other regulations that apply to WIPP and evaluate them for compatibility with RCRA. An example is closure, where DOE stated that Bureau of Land Management regulations would apply. DOE reminded the NMED and ATK that the DOE was committed to clean closure involving the retrieval and removal of all waste and waste residues.

11) Waste Characterization--NMED will take a close look at the applicability of process knowledge with regard to Group I waste. Head space sampling and analysis of this waste may not be sufficient characterization. DOE pointed out that there was no other type of sampling and analysis that would produce useful information due to the anticipated very low concentrations of hazardous constituents in Group I waste and the heterogenous nature of the waste.

12) Waste Tracking and Recordkeeping--Additional information will be needed here.

13) Waste classification--ATK would like to have a table that correlates the waste groups in the permit application to the item descriptor codes (IDCs) and the content codes that have been used previously. WIPP explained why these former codes were excluded and why DOE prefers not to have specific IDCs in the permit application.

At the conclusion of the meeting, the NMED stated the Part B completeness letter by stating it was with the Director (K. Sisneros) and was expected out in a week or so.

PREPARED BY:

R. F. Kehrman *R. F. Kehrman*

APPROVED BY:

P. C. Weddle *P. C. Weddle by R. F. Kehrman*

Date Signed 7/20/92

RA:92:4062



7-16-92
MEETINGS

BOB KETZMAN	WESTINGHOUSE	505-887-8787
LARRY LEDFORD	Westinghouse	505-887-8735
Gordon Venable	ASI	(505) 887-8632
Connie Walker	AT Kearney	303 572 6175
John Darabseris	A.T. Kearney	415 595 4300
Monica Roll	A.T. Kearney	415 595-4380
Berita S. Garcia	NMEO	(505) 827-4350
Susan Collins	NMEO	827-4350
TREY GREENWOOD	DOE/WSPP	(505) 887-6107

Best Available Copy



AGENDA

WIPP Part B Permit Application Meeting
July 16, 1992
1:00 pm - 3:00pm
Santa Fe, New Mexico

- 1) NOD milestones discussion
 - a) Proposed order to evaluate application chapters (attached)
 - b) Tentative schedule (attached)
 - c) Key elements of review process
 - NODs delivered to DOE approximately one week before scheduled meeting
 - Meeting will be held to discuss NODs
 - Approximate six week interactive review period for each chapter
 - Stop date for submittal of new data/revisions

- 2) Meeting Process
 - a) Agenda to be established by NMED
 - b) Meeting minutes will be taken by NMED representative
 - c) Establish how NOD discussion process will take place
 - d) Establish lines of communication during interactive review period, including specific personnel to be contacted, documentation of data/information exchange, etc.

- 3) Discussion of General Deficiencies and Topics of Concern-Part B Permit Application

- 4) Goals/dates of next meeting (July 30 and 31) in Carlsbad

