



**Department of Energy**  
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Ms. Judith Espinosa, Secretary  
 New Mexico Environment Department  
 P. O. Box 26110  
 Santa Fe, New Mexico 87502

Dear Secretary Espinosa:

This letter responds to comments and questions provided in your undated letter (received March 16, 1992) on the "Plan for Handling Newly Generated Contact-Handled Transuranic Solid Waste at Pacific Northwest Laboratory," Revision 2. The Waste Acceptance Criteria Certification Committee coordinated the enclosed disposition of your comments with the Westinghouse Hanford Company.

If you have any questions regarding this transmittal, please contact Les Gage of my staff at (505) 845-5983.

Sincerely,

W. John Arthur, III  
 Project Director  
 WIPP Project Integration Office



Enclosure

cc w/enclosure:  
 C&C File (ID 92000-)  
 N. Weber, NMED (2)  
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Responses to Comments Provided by the  
New Mexico Environment Department on  
the "Plan for Handling Newly Generated  
Contact-Handled Transuranic Solid  
Waste at Pacific Northwest Laboratory,"  
Revision 2

GENERAL COMMENTS

1. Comment: The Plan thoroughly addresses radioactive waste, however many of the precautions being taken for radioactive waste should also be taken for hazardous waste. Although the precautions taken for radioactive waste will overlap somewhat to cover hazardous waste, it is clear that most of the precautions are not intended to apply to hazardous waste. More generally, the problem of overemphasizing radioactive waste compared to hazardous waste may be a problem pervasive of all DOE. This concern is also mentioned in the "1991 annual performance report for environmental oversight and monitoring at Department of Energy Facilities in New Mexico" (NMED DOE/AL/65779-1) and is perhaps related to over-reacting to concern priorities of the general public.

Response: The next revision of the plan will be expanded to include the details of Pacific Northwest Laboratory's (PNL) program for managing mixed waste in accordance with the Environmental Protection Agency (EPA) and the State of Washington regulations.

SPECIFIC COMMENTS

1. Comment: Page 10, Section 4.3.1 Organization and Responsibilities. The operations authority refers to monthly inspections. If the containers hold mixed waste, the inspections should be weekly (New Mexico Hazardous Waste Management Regulations [HWMR-6], Part V, 40 CFR section 264.174; Pt. VI, sec. 265.174).

Response: The waste generators at PNL perform and document weekly inspections of hazardous waste containers (including mixed waste containers) as required by 40 CFR 264.174 and PNL's waste management manual (PNL-MA-8). The monthly inspection is an internal requirement that applies to all TRU

waste; this inspection is performed in addition to the weekly inspection of mixed waste. The next revision of PNL's Certification Plan will be changed to reflect the weekly inspection requirement for mixed waste.

2. Comment: Page 13, Section 4.3.10 Inspection. Again, there is a reference to the monthly inspection. See above for requirements for mixed waste.

Response: See response to Comment 1 above.

3. Comment: Page 16, Section 5.2, Waste Form Requirements and 5.2.1 Immobilization. Please quantify "significant quantities" and "nominal quantities."

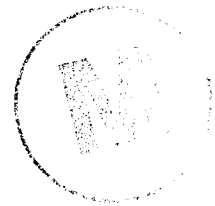
Response: The statement "PNL does not generate significant quantities, if any, of Contact Handled-Transuranic (CH-TRU) particulates, liquids. ... Waste" means that less than 10 percent of PNL's waste volume today is mixed or solidified liquid waste. "Nominal quantities" means that very small amounts of waste may be generated due to ongoing or future research activities. For example, PNL currently has some TRU waste drums of HEPA filters. The question existed at the time the Certification Plan was issued (January 1991) whether HEPA filters containing incidental dust met the WIPP-WAC immobilization criteria. Since that time, results of an engineering test performed by WHC indicate that HEPA filters would meet the WIPP-WAC immobilization criteria. These results have been submitted by WHC to the WIPP-WACCC for its consideration.

4. Comment: Page 18, Section 5.2.7 Combustibility. What is meant by \_\_\_\_\_ (incomplete sentence in original letter).

Response: The section will be deleted in the next revision to the plan since the section addressing waste form and container combustibility is no longer in the WIPP-WAC (Revision 4).

5. Comment: Page 20, Section 5.3.7 Labeling. It is not clear that a hazardous waste label is attached as required by HWMR-6, Pt. III, sec. 262.31.

Response: The TRU waste containers are marked and labeled in accordance with 49 CFR Sections 172.400. The TRU mixed waste containers are also marked as "hazardous waste" as required by 40 CFR 262.32. Your point is well taken and PNL will clarify Section 5.3.7 of the Certification Plan in the next revision.



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