

**NMED/DOE WIPP PART B PERMIT APPLICATION REVIEW
Summary of Technical Issues**

September 11, 1992 Meeting

Participants:

Susan Collins, NMED
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ITEM	DISCUSSION	CONCLUSIONS/FURTHER ACTIONS
Chapter B comments.	DOE/Westinghouse provided responses to Chapter B information request.	NMED signed for receipt of the response document.
Chapter C clarification letter.	NMED and ATK are working on the Chapter C clarification letter which will be available the week ending 9/19/92.	Deadline for DOE submittal of Chapter C responses will be extended one week.
Tape recording of meetings.	The preliminary meetings to discuss the information requests are to be considered working meetings. DOE may want to submit their version of meeting notes to NMED.	Working meetings will not be tape recorded. Written notes will be taken and submitted as part of the administrative record. DOE will submit copies of meeting notes from previous and future meetings as part of administrative record.
Public comment meetings.	The NMED is planning to solicit comments on the Part B application from the public in a series of public meetings. The public meetings will begin with a summary of where the permit applicaiton review is at this time.	NMED will continue public meeting plans. ATK will also provide opening comments on ATK's role in the permit application review. DOE presented NMED with a list of informational video tapes which are available for use by NMED during the public meetings.
Waste Handling Building (WHB) secondary containment.	DOE provided NMED with a copy of Drawing 41-D-009-014 which provides cross sections of the WHB drainage system. Drawing had been requested early in the Chapter D review.	The information request comment for this drawing will remain in the draft version of the document.
Inclusion of the technical information reviews in the administrative record.	The information request comments generated to date have been included in the administrative record which is available to the public. The information requests are drafts until the NOD is issued.	None.



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<p>Location of test phase waste storage in the underground area.</p>	<p>DOE indicated that only Panel 1, Rooms 1 and 3 will be used for test phase Bin Scale Test Rooms. This is clearly stated in the Chapter B revisions and will also be in revisions to the remaining sections.</p>	<p>None.</p>
<p>Roof support system. General comments 8 and 9.</p>	<p>NMED considers documentation of the adequacy of the supplemental roof support system to be critical. NMED and ATK do not have a contention with the design of the roof support system. However, it is important to reference or include support documentation regarding QA/QC procedures for installation of the system and a discussion of how monitoring system data will be used.</p>	<p>DOE indicated that the required information is in the Chapter D appendices, but they will check.</p>



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<p>Inclusion of a roof collapse or abnormal room physical closure in the contingency plan. General comment 10.</p> 	<p>NMED and ATK are interested in having a forward reference in Chapter D to a contingency plan for abnormal room closure. DOE does not consider a roof fall to be a credible event. DOE considers that one chance in a million per year to be an incredible event. The Parker letter is a point of contention. In addition, the whole concept of the repository is that roof collapse/closure is a natural event. DOE expected that NMED would be an independent judge of the adequacy of the support system. The adequacy of the system is not the real issue. Since the potential for room closure and/or collapse exists, then contingency plans must be in place to describe the activities which will take place. DOE indicated that if a roof collapse occurred then operations would cease, steps would be taken to immobilize any release, then meetings would be held with NMED and others to decide what to do. DOE indicated that one option of dealing with a roof fall, if it occurred late in the test phase when DOE was close to obtaining an operating permit, would be to leave the waste in place until the operating permit is issued. NMED does not want any disposal scenarios in the test phase permit application. DOE does not want to limit the choices in dealing with emergency situations by committing to written contingency plans. There are too many variables in a roof fall scenario to prepare exact plans.</p>	<p>DOE will prepare a contingency plan for room closure and/or roof fall which describes the process which will occur in the event of an emergency involving the room stability. DOE may provide the numbers to demonstrate that roof collapse has been investigated and shown to not be a credible event.</p>

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<p>Use of data from the geomechanical monitoring system. General Comment 9.</p>	<p>NMED recognizes that the Bin Scale Test Rooms are equipped with a sophisticated monitoring system. However, there is no information provided to demonstrate that the data gathered will be used to determine whether a problem exists with the support system. It is especially important to demonstrate the amount of advance warning the monitoring system can provide of an imminent hazard such as a roof fall. In addition, it is important to demonstrate that the system will allow adequate time to remove test bins in an emergency situation, and how the NMED will be notified. NMED does not want to make reporting of data from the monitoring system part of administrative record, but the reports should be available for review by inspectors.</p>	<p>None.</p>
<p>Amount of waste to be stored and the location of storage.</p> <div data-bbox="155 1239 354 1431" style="text-align: center;"> </div>	<p>DOE has revised Chapters A and B to describe the total amount of waste which may eventually be placed during the test phase. In addition, the revision describes that only bin scale tests are included in the permit application at this time. The total capacity of the WHB is 9000 drum equivalents, although all of the storage space will not be used. A footnote to Chapter A breaks out where the full 8500 drum equivalents may be placed when and if permitted. The capacities provided in the Part A are total capacity and throughput capability for the WHB. The permit can limit the amount of waste actually in storage. A permit modification will be needed to conduct alcove tests.</p>	<p>NMED will check regulations to ensure that waste quantities can be limited by the permit.</p>

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<p>Description of bin types.</p>	<p>DOE has revised Chapter B to describe the types of bins which will be included in the permit application. Type 1 bins are the bin types already included in the permit application. The type 1 bins will be used for non-pressurized tests. Gases generated in the bin will be vented to ensure no pressure buildup. An advantage of this system is the removal of hydrogen gas which is built up to eliminate fire and explosion hazard.</p> <p>The type 2 bins are a new design, particularly for the RCB. The Type 2 bins will be allowed to pressurize. The RCB in effect becomes a pressure vessel. Pressure will be equalized between bin and RCB so the RCB is not a secondary containment.</p>	<p>DOE will revise Chapter D to describe the bin types.</p>
<p>Derived waste storage area location and description.</p>	<p>The derived waste storage area will be located at the north end of Bin Scale Test Room 1 in Panel 1.</p>	<p>DOE will revise Chapter D to describe the location and configuration of the derived waste storage area.</p>
<p>Other regulatory agencies.</p> 	<p>NMED is interested in a summary of other agencies which have reviewed or approved designs, plans, and installations. DOE indicated that they are primarily self-regulating. Several regulatory agencies (such as OSHA) are allowed to conduct courtesy inspections under agreements with DOE. The only other real regulatory agency is U.S. EPA and the No Migration Variance Petition.</p>	<p>DOE will try to develop a list of cooperating agencies and describe the relationship to WIPP.</p>

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<p>Certification of plans, drawings, and reports.</p>	<p>NMED indicated that engineering plans and drawings submitted in the application may have to be certified by a professional engineer. DOE indicated that this is not normally required for DOE facilities and noted that neither Los Alamos National Lab or Sandia National Labs have certified drawings. DOE then explained the extensive internal and external reviews conducted for designs and plans. Architects and engineers cannot be constructors. Designs and plans undergo a readiness review by an independent agency. A "punch list" is developed for items requiring revision. When all issues have been resolved, the designs and review process is reported to the Secretary of Energy who determines if the facility can start up.</p>	<p>NMED will check further on the requirement for certification. DOE will summarize design review steps in the application. DOE may also add a certification type statement to the drawings.</p>
<p>Potential VOC emissions during WHB open container operations.</p> 	<p>It was not clear from the application whether the test bins would be "opened" during the installation of hoses, fittings, thermocouples and oxygen gettering systems while in the WHB. DOE explained that all of the connections on the bins are valved and remain closed until hoses are in place. Thermo couples are pre-installed at the generator and oxygen gettering systems are separate portable units which are attached to the bins, not installed.</p> <p>NMED was also concerned with potential VOC emission during bin purging to remove oxygen. DOE personnel indicated that the VOC content of each bin is limited by EPA via the No Migration Variance Petition. The VOC content of each bin is well below health based limits for air and will not be a problem.</p>	<p>DOE will revise Chapter D of the application to clearly show that the test bins are not opened while at WIPP. DOE will also emphasize that the VOC content of each bin is limited by the No Migration Variance Petition to very low levels.</p>

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<p>Hazardous constituent release monitoring.</p>	<p>NMED was concerned that only radiation monitoring is to be used to determine if a leak or release has occurred from a bin. NMED wants a demonstration that a release of hazardous constituents cannot occur without a corresponding release of radiation. DOE indicated that they could not envision a hazardous constituent release (except possibly an air VOC release) without a radiological release.</p>	<p>None.</p>
<p>Physical Closure of the mine versus RCRA clean closure.</p>	<p>NMED is going to consider that RCRA closure is complete after all equipment and structures have been decontaminated if it can be shown that another regulatory agency has the authority to provide written approval of the physical mine closure. DOE indicated that there should be no problem summarizing the BLM requirements.</p>	<p>DOE will provide a summary of the BLM requirements for physical closure of the mine.</p>
<p>Schedule of closure of the WHB.</p> 	<p>NMED is concerned that permitting of the WHB may allow DOE to store test bins indefinitely in the WHB at the completion of the test phase. NMED wants the application to include a specific closure schedule for the WHB and an identification of where the waste will be shipped at the completion of the test phase. DOE indicated that this was a major political issue and that DOE had previously agreed with NMED that the application required only a description of the process for obtaining a site to ship test waste to. NMED indicated that at a minimum, the closure plan must provide a commitment for removing waste from the WIPP. DOE indicated that the No Migration Variance Petition only allows waste to remain onsite until the year 2001.</p>	<p>None.</p>

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<p>Partial closure.</p>	<p>NMED wanted assurance DOE will notify the NMED when and if problems occur which require all or part of the test phase to end early. DOE indicated that they are required to contact NMED if early closure is required. There may be a time when one or several bins must be transferred to another permitted panel if problems occur in a portion of a room. A discussion ensued over whether this activity would constitute partial closure.</p>	<p>Partial closure of the Bin Scale Test Rooms will occur if test bins must be moved from a portion of the unit.</p>
<p>Procedures for removing and treating brine and treating damp waste.</p>	<p>NMED is interested in knowing how the brine in test bins will be removed from the bins and treated and how the remaining damp waste will be treated. DOE indicated that these procedures were still being developed.</p>	<p>None.</p>
<p>Next meeting.</p>	<p>The next working meeting regarding Chapters D and I will be Monday, 9/14/92, at approximately 6:00 PM. The meeting will be at the Ramada Hotel in Westminster, CO.</p>	<p>None.</p>

