


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

September 24, 1992

Participants:

Susan Collins, NMED
 Barbara Hoditschek, NMED
 Connie Walker, A.T. Kearney
 Greg Starkebaum, A.T. Kearney
 Daryl Mercer, DOE

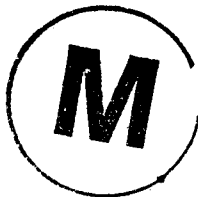
Bob Kehrman, Westinghouse
 Jack Johnson, Westinghouse
 Larry Ledford, Westinghouse
 Bryan Howard, Westinghouse

ITEM	DISCUSSION	CONCLUSIONS/FURTHER ACTIONS
<p>Clarification Letter, Chapter C NOD.</p> 	<p>NMED presented DOE with draft clarification letter for the Chapter C NOD. The letter presented various options that would be acceptable to NMED relative to waste characterization of Group I wastes, including: 1) full chemical characterization of contents of each Group I waste container prior to shipment to WIPP during Test Phase, 2) process knowledge (data and methodologies) with supporting chemical/physical characterization demonstrated prior to shipment of waste to WIPP during the Test Phase, and 3) presentation of process knowledge information (data and methodologies), with physical and chemical (headspace gas) analysis of wastes as they are being loaded into bins (as part of Test Phase rather than prior to initiation of Test Phase). NMED indicated that, in response to DOE clarification request number 1, DOE must present a methodology by which DOE will use process knowledge to determine waste characterization, and enough process knowledge information (flow charts) to visualize each waste stream. At a minimum, DOE is to include that information presented in Appendix C2,</p>	<p>DOE proposed a five-step waste characterization methodology for Group I wastes:</p> <ol style="list-style-type: none"> 1) Determination of drum contents using process knowledge and implementation of methodology to be presented in application. This information will determine, preliminarily, hazardous waste within each drum based upon process knowledge; 2) Evaluation of drum contents using RTR, to assist in determining waste categories and to help determine validity of process knowledge; 3) Headspace gas analysis, full proposed analytical suite and TIC, to determine organic (volatile) constituent content of drums; 4) Visual examination of drum contents as bins are being loaded to visually identify and confirm drum/bin contents;



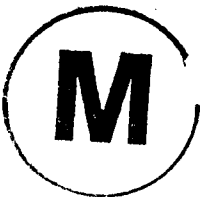
NMED/DOE WIPP PART B PERMIT APPLICATION REVIEW (Con't.)

ITEM	DISCUSSION	CONCLUSIONS/FURTHER ACTIONS
	<p>Section 3.0 of the February, 1991 permit application submission, modified to emphasize waste categories rather than Item Description Codes. Verification requirements concerning process knowledge (i.e. chemical/physical examination of waste before/during bin packing) is still being discussed internally by NMED.</p> <p>DOE provided NMED with draft revision of Table C-1 (attached), to be included in the application.</p>	<p>5) Comparison of RTR, visual examination data and chemical data to evaluate accuracy of process knowledge (NOTE: process knowledge accuracy should be known if DOE proposes to modify/remove any of steps 1-5 above during the Test Phase).</p> <p>NMED again indicated that process knowledge methodology and process knowledge information must be included in the application, and that the issue of verification is still being assessed internally.</p>
<p>Role of State in WIPP Test Phase Waste Acceptance.</p>	<p>The group discussed options concerning the role of NMED in the bin acceptance process. Alternatives discussed included providing NMED with data/information packages including all RCRA-required information; involvement by NMED in the WIPP waste acceptance evaluations; and NMED acquisition of appropriate data through facility inspections. DOE stated that DQOs were not developed with RCRA compliance in mind (except for No Migration requirements).</p>	<p>NMED will examine its role in the waste acceptance process at WIPP.</p>



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<p>Chapters D and I Information Request Letter.</p>	<p>DOE questioned the level of detail required relative to personnel decontamination procedures. Discussion ensued concerning comparison of radiation vs. non-radiation decontamination procedures. DOE indicated that radiation decontamination requirements were more stringent than those required to detect/decontaminate relative to RCRA constituents.</p> <p>NMED indicated that a permit modification to go from the Test Phase to Operational Phase is not recommended by the State, as there is State precedence which disallowed this type of modification. Additionally, NMED indicated that the application must clarify the intended closure schedule relative to both surface and subsurface facilities at WIPP, should the Test Phase fail.</p> <p>The group then discussed how the closure schedule would be developed. Options discussed varied from considering a maximum allowable time for each bin within the surface facilities before shipment offsite, to one date by which all bins must be removed from the Waste Handling Building be considered for all bins (thus removing the necessity to have schedules for each individual bin). NMED indicated that it would not consider the Waste Handling Building an interim storage facility for any extended length of time, and will likely integrate a maximum storage date in the permit. DOE indicated that dewatering of bins could be a lengthy endeavor, and discussion ensued concerning maximum times required to prepare bins for offsite shipment should the Test Phase fail. DOE indicated that it will address the issue of maximum required time for closure in the response to the</p>	<p>DOE will address the issue of closure schedule within the response to the information request for Chapter I. DOE will also discuss why decontamination relative to radioactive constituents would also be protective relative to RCRA constituents, but no resolution was reached concerning the required level of detail concerning decontamination procedures within the application. DOE will prepare a position paper concerning co-releases of radioactive/hazardous constituents, and will also acquire information requested by NMED during the Rocky Flats Site visit.</p>



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	<p>information request. NMED also pointed out that modifications to the closure plan (relative to specific closure details) can be requested.</p>	
<p>Rescheduling of Meeting.</p>	<p>Because DOE and NMED representatives will be in Washington, D.C. the week of October 5-9, the October 8 meeting to discuss "all other chapters" has been rescheduled to October 13. Additional questions concerning the Chapter C clarification letter may be addressed during this meeting. Additionally, DOE indicated that it would be able to provide a "show and tell" discussion concerning the Type A and Type B bin design during this meeting.</p>	<p>None.</p>

