

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

October 13, 1992

Participants:

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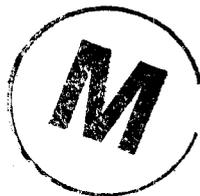
| ITEM   | DISCUSSION  | CONCLUSIONS/FURTHER ACTIONS   |
|--|---|---|
| Detection of co-contamination, transuranic and hazardous waste constituents. | NMED and DOE discussed whether hazardous constituents or a release of hazardous wastes will always be accompanied by a release of radioactive material. DOE argued that by the definition of "mixed" waste, a release of hazardous waste or constituents will always be accompanied by a release of radioactive material. DOE also stated that by assuming co-contamination, the process would detect non-visible quantities of hazardous waste or constituents, lower than the quantity normally detected as part of RCRA release detection process (visible leaks). | NMED expressed concerns relative to sensitivity of the co-contamination methodology. No firm conclusions concerning the acceptability of the method were drawn.<br><br> |
| Meeting date modification.   | DOE had planned to give a presentation concerning Type I and II bin design on Friday, October 16. The meeting was rescheduled to correspond with a planned NMED WIPP site visit on October 22 and 23. The meeting will be held in Carlsbad.   | No further discussion.  |
| Potential permit application modifications.                                  | DOE indicated it was possible that modifications would be made to the application, switching the hazardous waste management unit(s) from Room 3 to Room 4. DOE questioned when this modification should be made, and the nature of a permit modification required if the change was made after permit issuance (if a permit was issued).  | NMED indicated that the permit application must be as final as possible relative to determination of Test Phase hazardous waste management unit(s). Modification of the permit was not recommended.   |

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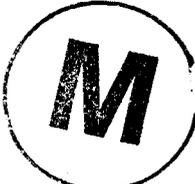


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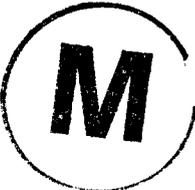
| <b>ITEM</b>                                 | <b>DISCUSSION</b>  | <b>CONCLUSIONS/FURTHER ACTIONS</b>   |
|---|--|--|
| <p>Subsurface safety during Test Phase.</p> | <p>NMED indicated that subsurface safety is of paramount importance, and the application must address all NMED concerns in this regard. Safety relative to gas generation (including flammability and explosivity) is of concern, as well as bin design to ensure safe test performance. DOE indicated that they believed flammability/explosivity issues were managed appropriately, and that the FSAR for the dry bin scale tests ensured safe operating conditions during the dry bin tests. NMED asked the number of bins which may be managed in the Waste Handling Building (WHB) at any one time. DOE indicated that two to four bins will be managed within the WHB during the Test Phase (the number could be much higher if following the Test Phase, drums must be removed from the subsurface and sent from WIPP).</p> | <p>Discussion of subsurface safety issues may continue during the October 22 and 23 meetings.</p>  |
| <p>Information request, Chapter E.</p>      | <p>DOE requested information concerning level of detail required within the text concerning site hydrology.</p>  | <p>NMED indicated that the text should include a condensed version of the information presented in the appendices, but the appendices should remain as attachments to the application.</p> |



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| <p>Information request, Chapter F.</p>  | <p>NMED and DOE discussed individual information request items. NMED had requested additional information concerning signs surrounding the WIPP facility relative to RCRA requirements. DOE questioned whether the signs were required around 90-day storage areas, and indicated that many postings were placed to meet regulatory requirements of other agencies/regulations. NMED also indicated that Table F-1 needed more information. Discussion ensued concerning the level of information required within the application relative to that included in supporting texts. General discussion continued concerning how forms, personnel lists, etc. modifications would be managed by NMED if these are included with the permit (i.e., type of permit modification required when form changes are made). The subject of VOCs within the WHB was raised; DOE indicated that No Migration Determination (NMD) requirements addressed the need for monitoring in the WHB. DOE indicated that key safety elements within the FSAR would be integrated within the application to address information requests. NMED requested additional information and secondary containment relative to prevention of hazards, including inspection concerns. General discussion ensued concerning time frames for cleanup of materials within the RCB if a leak is detected. The group also discussed general safety concerns including equipment inspections, personal protective equipment, monitoring of bins (prevention of flammable/explosive gas development).</p> | <p>NMED concluded that the signs in question should be specific to the hazardous waste management units in the application. NMED also concluded that the level of detail within the application should be a "condensed" or generic version of information within the manuals, but more specific than that in the current application. Cross-referencing Chapter F to other portions of the application containing additional information is acceptable.</p> <p>NMED indicated that any modifications to forms, personnel lists, etc. included as part of the application could be managed as a Class 1 modification. NMED indicated that additional information was required within the application specific to the need for monitoring VOCs within the WHB, and DOE indicated that additional information would be provided in the revised Section D. The FSAR for the Dry Bin tests is available, but NMED expressed interest in remaining FSARs yet to be published that detail safety concerns for humid and wet bin tests. DOE will address secondary containment issues and inspection concerns within the application.</p> <p>DOE indicated that time frames for leak cleanup will be discussed in the application; various issues including bin design/management (i.e., load size discrepancies and VOC monitoring system) will be discussed in modified Chapter D and referenced in Chapter F.</p> |

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| <p>Information requests, Chapter G.</p>  | <p>DOE had no questions concerning NMED information requests 1 through 3. DOE also indicated that the phone numbers and addresses of all personnel were provided only in NMED copies to help ensure privacy of the individuals. General discussion ensued concerning consistent usage of personnel titles, and information available to the emergency coordinator. NMED indicated that the contingency plan must be a "stand-alone" document and should address potential roof failure and explosion/fire. DOE indicated that they did not believe these to be credible scenarios, and that addressing release occurrences (regardless of the cause) would suffice.</p> <p>DOE indicated that Section F will be referenced within Section G to deal with emergency scenarios of roof collapse and gas monitoring. NMED indicated that clarification concerning titles and responsibilities is required within Chapter G, and DOE agreed to clarify. General discussion ensued concerning what should be included in a contingency plan, and DOE questioned whether any release would require implementation of a contingency plan. DOE agreed to clarify many NMED comments concerning comparability, controlling emergencies, etc. Again, DOE expressed concern relative to the quantity of information to be included within the application vs. that which can be referenced. NMED indicated, through comments, that the contingency plan should address units such as the less-than-90-day hazardous waste storage areas. DOE questioned this.</p> | <p>NMED understood DOE concerns relative to maintenance of privacy, but indicated that typical contingency plans included appropriate information (i.e., phone numbers) of emergency personnel. Resolution of the final issue relative to including roof collapse and fire/explosion within the contingency plan was not resolved within the meeting, although NMED indicated that some of the supporting information could be provided in Chapter F.</p> <p>NMED indicated that DOE must keep in mind that the contingency plan is to be a stand-alone document, and address the information requests accordingly. NMED indicated that contingency plans for typical facilities usually include units other than those for which the permit is sought, and it is therefore applicable that these other units (i.e., less-than-90-day storage areas for hazardous waste) be included in the contingency plan.</p> |

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| <p>Information requests, Chapter G (cont.).</p>   | <p>DOE indicated that NMED concerns relative to storage and treatment of released materials, incompatible wastes, post-emergency equipment maintenance, container spills and leakage, coordination agreements, the evacuation plan, and required reports will be addressed in the next revision of the contingency plan.</p>  | <p>NMED agreed to examine the revised application with the proposed clarifications.</p>   |
| <p>Information requests, Chapter H.</p> <div data-bbox="170 1052 365 1246" style="border: 1px solid black; border-radius: 50%; width: 100px; height: 100px; display: flex; align-items: center; justify-content: center; margin: 20px;"> <span style="font-size: 48px; font-weight: bold; letter-spacing: 5px;">M</span> </div> | <p>DOE indicated that inclusion of job titles and descriptions within the application is not applicable. NMED disagreed, and DOE indicated it will add general job descriptions within the application. DOE indicated that it may bold-face applicable training within the manuals relative to TRU-mixed waste training to cover applicable courses. DOE will modify the application to address training director concerns and relevance of training to job positions. General discussion ensued concerning training requirements of the technical training manager and specifically whether the manager must receive all of the same training as subordinates. DOE expressed concern about including specific personnel within the application, because personnel can change relatively frequently, requiring a permit modification. NMED indicated that appropriate information must be included, but minor modifications could be handled as a Class 1 permit modification. DOE will also add relevance of training to job positions (i.e., office workers), and training for emergency responses.</p> | <p>NMED indicated that the application should include the clarifications requested in the information request, and that this information is applicable to the permit. NMED indicated that any modifications in the future could be considered a minor modification (depending on the nature of the modification), so that DOE will include all appropriate information.</p> |

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| Information requests, Chapter J. | DOE did not question any of the information requests by NMED, which included provision of analytical data relative to future releases, provision of a full list of Solid Waste Management Units (SWMUs), and storage times within container storage areas.   | No action required at this time; NMED will evaluate DOE responses when information request is addressed. |
| Chapter B.                       | DOE provided NMED a revised Chapter B, addressing NMED NODs for this chapter. NMED evaluated the response and had additional concerns relative to quantities of wastes listed in the Part A application, revision of numerous figures, clarification of the land withdrawal issue, and clarification of geologic questions. DOE indicated it would address these concerns, and also stated that it would prefer to address these concerns immediately through an information request letter. | NMED will issue a Request for Information to deal with outstanding issues pertinent to Chapter B.        |
| Chapter C.                       | NMED indicated that although the response to Chapter C NOD and Clarification letter is due by November 13, it would be helpful if DOE could submit the revisions to Chapter C at an earlier date.  | DOE indicated it would attempt to provide Chapter C earlier, but could make no guarantees.               |

