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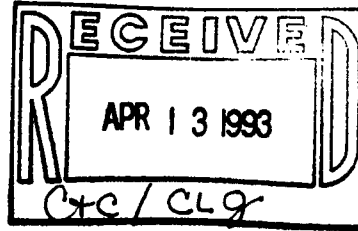


ENTERED

JUDITH M. ESPINOSA
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April 13, 1993



Arlen E. Hunt
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- X C&C
- X PRC
- Anderson
- X Carrell
- X Cox
- Kuntz
- X Lee
- Mugno
- X Reed
- Trego
- Weddle
- X Conway
- X W. Caplinger
- X Weyandt
- X Gaisler
- X K. Donovan
- X Epstein

RE: Request for Further Information - Waste Isolation Pilot Plant (WIPP) Part A and B Permit Application Revision 3.0

Dear Messrs Hunt and Cox:

The New Mexico Environment Department (NMED) has completed the technical review of the Part A and B Waste Isolation Pilot Plant (WIPP) Application Revision 3.0, submitted January 27, 1993 by the Department of Energy/Westinghouse Electric Corporation, Waste Isolation Division (DOE/WID).

NMED has some concerns relative to issues in Chapters C and D of the Part B Waste Isolation Pilot Plant (WIPP) Application (Revision 3), which will require submission of additional information from DOE/WID. It is imperative that DOE/WID provide sufficient detail in their submittal of information for NMED to make a final determination on these issues. The information is to be submitted no later than April 20, 1993.

The following issues are to be addressed:

1. **Appendix C9**

The Audit Program does not address accountability and authority when discrepancies are noted during an audit. Namely, it is not clear who will have authority:

- > to stop further shipment of waste until discrepancies are resolved

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- > to correct discrepancies and ensure changes are adequate and properly implemented; and
- > to return prior shipments of wastes made during the discrepancy timeframe to the generator if required.

Further, the audit program does not include an adequate frequency of inspection. Inspection should be performed prior to and again within the first three months of waste shipment. The Audit Program Checklist focuses on analytical performance. The checklist should also provide for evaluating the systems in place which address waste identification, labelling, storage, inspection, notification, etc.

NMED requests DOE/WID submit the missing information.

2. **Pages D-3 and D-37**

Humidity transfer/injection into bins is unclear within the application. Injection of vapor is implied (consistent with Appendix 17 - Corrosion Assessment), but Page D-3 could be interpreted as meaning liquid brine will be introduced into bins. There is no other clarification of how bin humidity will be injected, or how the total amount of moisture injected will be measured and maintained at a level to assure that liquids are not than 1% by volume.

NMED requests DOE/WID submit clarification concerning how humidity will be introduced and maintained, and how the total volume of liquid injected will be determined.

3. **Page D - 16**

Carbon canister dimensions and storage plans are unclear with the application. For example, specific storage locations in the BSTRs and WHB for spent carbon canisters have not been identified, apparently because they are intended to be shipped off-site for regeneration. Also, Page D - 16 states that canisters are 6 feet long, and a "full change out" of canisters from both rooms (2 canisters) will occupy a space 1 x 1 x 6 feet. However, Drawing 412-M-003-W indicates that each canister will be approximately 6 feet, 10 inches long (counting welded end caps and fittings).

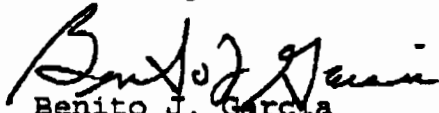
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Storage of waste or "spent" carbon canisters (more than 90 days) may be necessary, since commercial disposal or regeneration facilities may not be willing to accept the canisters (which could contain radioactive waste). In order to remove the carbon, the welded end caps and screen will have to be cut or mechanically removed, and there may be some potential for radiological contamination (e.g., tritium). The number of spent carbon canisters which may be generated during the Test Phase is unknown (page D - 16), but 4 to 6 may be a reasonable estimate.

NMED requests DOE/WID provide definite plans for spent carbon canister storage, in the BSTRs and the WHB, identifying a maximum number of containers, storage locations, and any necessary structure (rack to prevent rolling), as well as a revised estimate of the maximum size of the storage space.

If you have any questions regarding this request for information, call me or Barbara Hoditschek of the Hazardous and Radioactive Materials Bureau (HRMB) at (505) 827-4308.

Sincerely,


Benito J. Garcia
Bureau Chief, HRMB

cc: Judith Espinosa, Secretary, NMED
Kathleen M. Sisneros, Director, NMED
Tracy Hughes, Legal, NMED
Barbara Hoditschek, Prog. Mgr., NMED
Daryl Mercer, WPIO
Bob Kerman, WID
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