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SEP 13 1994

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WIPP file

Mr. Benito Garcia
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Dear Mr. Garcia:

Enclosed is a copy of the final WIPP Land Management Implementation Plan. Your participation in the development of this document is appreciated. Please keep in mind that this plan is considered to be a dynamic document that is intended to be implemented under changing conditions and requirements. Therefore, we remain open to comments and, if changes occur, you will be notified and updated accordingly.

If you have questions or concerns, please call Beth Bennington of my staff at (505) 234-8132 or Douglas Lynn of Westinghouse at (505) 234-8739.

Sincerely,

E. K. Hunter
E. K. Hunter, Chief
WIPP Site Branch

Enclosure

cc w/o enclosure:
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C&C File

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WASTE ISOLATION PILOT PLANT

LAND MANAGEMENT IMPLEMENTATION PLAN

DOE/WIPP 94-026

August 1994

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ACRONYMS AND ABBREVIATIONS

APD	Application for Permit to Drill
API	American Petroleum Institute
ASER	Annual Site Environmental Report
AUM	Animal Unit Month
BECR	Biennial Environmental Compliance Report
BFB	Backshift Fire Brigade
BLM	Bureau of Land Management
CAO	Carlsbad Area Office (of the DOE)
CFR	<i>Code of Federal Regulations</i>
CMRO	Central Monitoring Room Operator
DOE	Department of Energy
DOE-AL	Department of Energy Albuquerque Operations Office
DOI	(United States) Department of Interior
EA	Environmental Assessment
EEG	Environmental Evaluation Group
ECL	Environmental Checklist
EIS	Environmental Impact Statement
EMNRD	(New Mexico) Energy, Minerals, and Natural Resources Department
EOC	Emergency Operation Center
EPA	(United States) Environmental Protection Agency
ERO	Emergency Response Organization
ERT	Emergency Response Team
ESH&RC	Environment, Safety, Health and Regulatory Compliance Department of WID
EST	Emergency Services Technical
FEIS	Final Environmental Impact Statement for WIPP (1980)
FLPMA	Federal Land Policy and Management Act
FOSS	Facility Operations Shift Supervisor
FRCD	Forestry and Resource Conservation Division of EMNRD
HAZMAT	Hazardous Materials
LMC	Land Management Council
LMIP	Land Management Implementation Plan
LMP	Land Management Plan
LUC	Land Use Coordinator
LUR	Land Use Request

M&O	Management and Operating Contractor for WIPP
MOU	Memorandum of Understanding
MSDS	Material Safety Data Sheet
NEPA	National Environmental Policy Act
NES	Nonradiological Environmental Sampling
NMDG&F	New Mexico Department of Game and Fish
NMED	New Mexico Environment Department
OCD	Oil Conservation Division of EMNRD
ORV	Off-Road Vehicle
P.L.	Public Law
PPE	Personal Protective Equipment
RCRA	Resource Conservation and Recovery Act
SEIS	Final Supplement to the FEIS (1990)
SHPO	State Historic Preservation Officer
SLO	(New Mexico) State Land Office
SNL	Sandia National Laboratories
SPDV	Site and Preliminary Design Validation
SRS	Supervisory Realty Specialist
STR	Subcontract Technical Representative
T&E	Threatened and Endangered
TRU	Transuranic
U.S.C	<i>United States Code</i>
USF&WS	United States Fish and Wildlife Service
WID	Waste Isolation Division of Westinghouse Electric Corporation
WIPP	Waste Isolation Pilot Plant
WLWA	WIPP Land Withdrawal Area
WP	WIPP Procedure

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FOREWORD

Through continual information sharing and timely updates of the Land Management Implementation Plan (LMIP), the WIPP seeks to encourage improved land management practices based upon sound professional standards. Meeting this goal hinges on the reliability and successful application of techniques used to assess management goals and establish guidelines for the implementation of land management practices that reflect those goals.

This document culminates the efforts of colleague consultations and reviews pertaining to the demand for accuracy, and functions as a useful reference of reliable methods to generate and/or evaluate information required to achieve responsible resource management. Guidance actions and techniques prescribed by the LMIP are useful for proposed activities, external as well as WIPP-related, that could impact lands used in the operation of the WIPP.

A potential land user who wishes to request access to WIPP lands should examine the Table of Contents closely to determine the compatibility of their proposed project or activity with WIPP compliance requirements. For example, any potential user should read Chapter 2, "Environmental Compliance," to familiarize themselves with the required permitting procedures and coinciding documentation.

It is the goal of the DOE to develop a "user-friendly" document that allows for a professional, accurate interpretation of management goals and objectives required to maintain site integrity and environmental quality and sustain multiple-land use.

EXECUTIVE SUMMARY

In accordance with the adoption of the Waste Isolation Pilot Plant Land Management Plan (DOE/WIPP 93-004) (LMP), the DOE identified the need for a concurrent LMIP. The development of this plan is in consultation with the U.S. Department of Interior's (DOI) Bureau of Land Management (BLM) and the State of New Mexico. Future amendments to this plan shall be done in consultation with affected stakeholders as specified in Appendix I of this document.

The WIPP LMIP is prepared through integration of the WIPP Land Withdrawal Act of 1992 (P.L. 102-579), the WIPP LMP, and BLM planning regulations (43 CFR 1600) issued under the authority of the Federal Land Policy and Management Act of 1976 (FLPMA) and the National Environmental Policy Act of 1969 (NEPA). The LMIP is designed to provide a comprehensive framework for the management and coordination of WIPP land uses during the life of the project. The LMIP, and any subsequent amendments thereto, will continue through the decommissioning phase.

The guidelines prescribed in the LMIP provide for the management and oversight of WIPP lands under the jurisdiction of the DOE in addition to lands outside the WIPP boundary that are used in the operation of the WIPP (e.g., groundwater surveillance well pads outside the withdrawn area). Furthermore, this plan provides for multiagency involvement in the administration of DOE land management actions. Documents referenced in the LMIP are available upon request to any person and/or organization desiring to conduct activities on lands under the jurisdiction of the WIPP in addition to those involved in development and/or amending

existing land management actions. Requests for documents should be filed by way of the WIPP Land Use Coordinator (LUC).

The LMIP envisions and encourages direct communication among stakeholders, including federal and state agencies involved in managing the resources within, or activities impacting the areas adjacent to, the WIPP Land Withdrawal Area (WLWA). It sets forth cooperative arrangements and protocols for addressing WIPP-related land management actions. The DOE recognizes the guidelines for contemporary land management practices pursuant to the WIPP Land Withdrawal Act and all applicable regulatory requirements contained therein. Commitments contained in current permits, agreements, or concurrent memoranda of understanding (MOU) with other agencies (e.g., State of New Mexico, DOI), shall be adhered to when addressing/evaluating land use management activities and future amendments that affect the management of WIPP lands.

The contents of the LMIP focus on the management protocol pursuant to the following issues: execution of the plan; environmental compliance; emergency management; industrial safety; maintenance and work control; minerals/oil and gas; reclamation; cultural resources; access/rights-of-way; recreation; security; wildlife; and grazing. Each issue and its coinciding planning/management criteria are described in the respective chapters.

CHAPTER 1

**EXECUTION OF THE
LAND MANAGEMENT IMPLEMENTATION PLAN**

CHAPTER 1

EXECUTION OF THE LAND MANAGEMENT IMPLEMENTATION PLAN

1.0 INTRODUCTION

WIPP land management authorizations and actions, including budget proposals, shall conform with, or at a minimum not conflict with, this LMIP. Valid existing rights, operations, and activities under existing permits, contracts, cooperative agreements, MOUs, or other instruments for land use shall be evaluated to assure that the Land Use Request (LUR) process does not conflict with preexisting permits and/or agreements. Requirements for implementation are contained in the WIPP LMP.

Actions in the LMIP shall be implemented over a period extending throughout the predisposal, disposal, and decommissioning phases of the WIPP Project. In some cases, more detailed and site-specific planning and environmental analyses may be required before an action can be taken.

The LMIP shall be reviewed annually and updated as needed, in consultation with the BLM and the State of New Mexico, to reflect new management direction, program policy, and monitoring results, or to respond to changing management needs within the scope of approved

DOE decisions, the LMP, and congressional mandates as contained in the WIPP Land Withdrawal Act.

As implementation of this plan proceeds, proposed actions not detailed in this plan will be weighed against the intent of this plan to determine conformance with the plan's objectives. The Land Management Council (LMC), convened in accordance with guidelines established by its charter (Appendix A), shall review all proposals through the LUR process, as defined in Chapter 2 of this plan, to determine whether land use actions proposed in the LUR are addressed specifically in this plan or, if not mentioned, if they are clearly consistent with the terms, conditions, and decisions of the approved plan.

1.1 OBJECTIVES

The objective of the LMIP is to provide the DOE with land management guidelines in addition to establishing criteria for review and implementation of land management decisions. These appraisals allow the DOE to evaluate the effectiveness of multiple-use decisions, and will provide guidance for the evaluation of productivity, condition, quality, or other issues related to land management actions. Monitoring plans for each respective land resource are discussed in subsequent chapters of this document.

1.2 PLANNED ACTIONS

1.2.1 Maintaining the Land Management Implementation Plan

The LMIP shall be reviewed annually in consultation with the BLM and the State of New Mexico and shall be maintained efficiently through timely updates which document additions (e.g., amendments to existing regulations), deletions, and other changes which have undergone appropriate WIPP document review procedures.

1.2.2 Updating, Amending, or Revising the Land Management Implementation Plan

The LMIP may be updated, amended, or revised by the LMC, in consultation with internal and external entities with vested interests or regulatory oversight (affected stakeholders, Appendix I), as appropriate, when considering a proposal or an action that is not addressed by the LMIP. The categories of the plan amendments are discussed below.

1.2.2.1 Updates

This category is used to define activities designated as "low impact" by the LMC. The purpose of this category is to designate proposal(s) that the LMC, in consultation with cognizant regulatory personnel, has identified as not being addressed specifically in the LMIP, and as not having significant environmental impact (see Figure 2.1). A LUR shall be submitted to the LMC for status determination. Cognizant regulatory personnel will assess the project for

determination (e.g., DOE/NEPA categorical exclusion). Updates, as defined in 1.2.2.1, do not necessarily require a plan alteration.

1.2.2.2 Amendments

This category is used when preliminary analysis by the LMC indicates that proposal(s) not specifically addressed in the LMIP have, or are likely to have, significant impacts. In this case the LMC, in consultation with cognizant regulatory personnel and affected stakeholders, and in accordance with all existing agreements (e.g., MOUs), will evaluate regulatory impacts and possible permit requirements and request a NEPA determination from the DOE.

1.2.2.3 Revisions

This category is used when a proposal(s) not specifically addressed in the LMIP will have a significant impact. A revision of the LMIP may involve the preparation of a new LMIP when updates or amendments can no longer keep the existing plan current with changing management needs, resource conditions, policies, or regulatory laws. Plan revisions will be considered only after a comprehensive review by the LMC and cognizant regulatory personnel, in consultation with the BLM and the State of New Mexico. Revisions will be reviewed by all affected stakeholders and may include formal public involvement. A revision likely would result in a significant mission or regulatory change and would be conducted in accordance with all pertinent DOE planning policies.

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CHAPTER 2

ENVIRONMENTAL COMPLIANCE

CHAPTER 2

ENVIRONMENTAL COMPLIANCE

2.0 INTRODUCTION

Parties who desire to conduct activities that have the potential to impact resources or land use on the WLWA, or on lands outside the WLWA boundary under the jurisdiction of the WIPP, must submit a LUR (Appendix B) to the WIPP LUC. A LUR consists of a narrative description of the project, a completed environmental checklist (ECL) (Attachment 1 to Appendix B), and a map depicting the location of the proposed project. A LUR must be submitted by any entity wishing to conduct a project or activity which may impact surface lands or resources within the WLWA or on lands used in the operation of the WIPP, under the jurisdiction of the DOE. The LUR is used to determine if applicable regulatory requirements have been met prior to approval of a proposed project (see Figure 2.1). The LUR process also pertains to subsurface activities that are outside the defined WIPP mission statement or previously approved WIPP programmatic NEPA documentation (e.g., neutrino experiments).

2.1 OBJECTIVES

The objective of this chapter is to describe the method that the DOE, working in coordination with the WIPP LUC, will use to review and implement regulatory guidelines that

govern all land use activities at the WIPP site. The DOE is required by various DOE Orders, consultation and cooperation agreements, MOUs, and regulatory requirements to evaluate all applicable local, state, and federal regulations prior to approval of any project that could impact human health or the environment.

2.2 PLANNED ACTIONS

The review and implementation of applicable regulatory requirements is initiated by a NEPA review. NEPA requirements are contained in the WIPP NEPA Compliance Program (WP 02-EC), and the associated NEPA procedures (e.g., WP 02-801, "NEPA Compliance," and WP 02-802, "NEPA Evaluation, Tracking, and Monitoring"). As described below, the ECL is used to initiate regulatory reviews. Through the submittal of a LUR and the attached ECL, the WID NEPA Compliance Coordinator evaluates potential environmental impacts, mitigating actions for the impacts, and potential permit requirements. ECLs are evaluated to determine if air, water, hazardous waste, or land use permits are required to complete a LUR. Potential impacts to wildlife and cultural resources are also evaluated by the ECL.

A detailed discussion of all regulatory requirements applicable to the WIPP Project is contained in the "WIPP Biennial Environmental Compliance Report" (BECR), DOE/WIPP 94-021, and the "WIPP Annual Site Environment Report" (ASER), DOE/WIPP 93-107. Both documents, available from the LUC on request, provide a regulatory compliance status for federal, state, and local environmental regulations applicable to the site. Prospective land use requestors will find that the BECR and the ASER are effective reference documents for better understanding regulatory requirements at the site. Both documents will

assist the requestor in identifying potentially applicable regulations that could affect the development of project schedules prior to submittal of both the LUR and the ECL. LUR submittals shall be reviewed in accordance with the flow diagram illustrated in Figure 2.1 of this chapter.

2.2.1 National Environmental Policy Act and Land Use on Properties Used in the Operation of the Waste Isolation Pilot Plant

2.2.1.1 Waste Isolation Pilot Plant Project Requests for Projects Within the WLWA

LURs associated with WIPP-specific activities, to include WIPP contractors and subcontractors, shall be submitted as follows:

1. The requestor will submit to the LUC a written request identifying the proposed project.
2. The LUC will provide the requestor with a DOE ECL (Attachment 1 to Appendix B) and a guide for the proper completion of a LUR (Appendix B). The submittal of a properly completed LUR (containing the completed ECL) is mandatory for obtaining authorization for use of lands contained within the WLWA, or lands outside the WLWA boundary used in the operation of the WIPP, managed under the jurisdiction of the DOE (e.g., groundwater surveillance pads, railroad rights-of-way).

3. The requestor will complete and submit the LUR to the LUC.

2.2.1.2 Land Use Request Review Process

1. The LUC will assign a unique number to the LUR with the corresponding DOE-AL ECL (with the WIPP checklist attachment) and enter the LUR into a tracking system.
2. The LUC will review the LUR to ensure completeness and transmit it, along with any supporting documentation, to the Waste Isolation Division (WID) NEPA Compliance Coordinator for review and determination. The NEPA Compliance Coordinator will enter the LUR number into the computerized NEPA tracking database.
3. The NEPA Compliance Coordinator will review the submitted ECL for impacts to human health and the environment per WP 02-802, "NEPA Evaluation, Tracking, and Monitoring." This procedure provides the sequence for evaluation of a proposed project.
4. In consultation with appropriate cognizant regulatory personnel, the WID NEPA Compliance Coordinator will complete a technical review, as required, to address any concerns not completely addressed on the LUR/ECL. Items that need to be resolved prior to project initiation will be added to the review in order to comply with regulatory considerations such as waste minimization, water and air permit

requirements, waste management, reclamation requirements, and rights-of-way, in addition to other concerns pertaining to the protection of human health and the environment.

5. The WID NEPA Compliance Coordinator will decide whether the proposed action represents a possible significant impact based upon 10 CFR 1021, "National Environmental Policy Act Implementing Procedures," and supplemental DOE guidance (e.g. DOE-AL Supplemental Directive 5440.1D).
6. If the proposed action represents possible significant impacts to human health and the environment, the ECL will be submitted to the DOE-AL for a NEPA determination. A copy will be sent to the LUC, who will arrange a meeting with the requestor. The requestor(s) will be advised of regulatory concerns.
7. If the ECL has addressed regulatory issues adequately, as appropriate to the specific project, the ECL will be returned to the LUC with a recommendation to approve the use of the land as represented in the ECL.
8. If the ECL has not addressed regulatory issues adequately, the ECL and the NEPA Compliance Coordinator review will be returned to the LUC with a recommendation to reject the request for use of the land until such time as the review items are addressed to the satisfaction of the LUC, the WID NEPA Compliance Coordinator, and the DOE.

9. The LUC will log out the ECL, signifying the return of the ECL to the requestor.
10. The LUC will return the ECL and the NEPA technical review to the requestor for resolution of identified issues.
11. When the requestor has addressed all concerns contained in the review satisfactorily, the ECL, along with review resolution documentation, will be returned to the LUC.
12. The LUC will log in the returned request and route the package to the NEPA Compliance Coordinator.
13. The NEPA Compliance Coordinator will reevaluate the ECL for completeness and adequacy.
14. The NEPA Compliance Coordinator will return the ECL to the LUC with a recommendation to either approve or reject the request.

2.2.1.3 Project Requests Through the Bureau of Land Management or State Land Office

Requests for projects that involve land uses on BLM, state, and DOE lands will require a "lead agency" determination. Lead agency status regarding projects involving multiple agencies will be determined by existing MOUs (Appendix C) or 40 CFR 1501.5. To this extent the following criteria are used to determine "lead agency" designation:

- Magnitude of respective agency's involvement
- Project approval/disapproval authority
- Expertise concerning the action's environmental effects
- Duration of agency's involvement
- Sequence of agency's involvement
- Concurrence by affected agencies

In the event the DOE receives lead agency designation, guidelines contained in Subsection 2.2.1.1 of this document apply. If either the BLM or the state is determined to be the lead agency, the LUR review process will be as follows:

1. A request will be submitted in writing to the LUC for use of the land within the WLWA, or on lands outside the WLWA under the jurisdiction of the WIPP, by a non-WIPP organization.
2. The requestor will contact the BLM or the State Land Office regarding their proposed action.
3. The BLM or state Supervisory Realty Specialist (SRS) will provide the requestor with an ECL.
4. The requestor will provide information to the lead agency to allow an environmental assessment (EA) to be prepared for the proposed project. Ancillary project actions (e.g. scope, format, payment of associated costs, etc.) shall be negotiated, prior to

- project approval, between the requestor, the LMC, and affected stakeholders (as appropriate). These details must be resolved to the mutual satisfaction of all parties.
5. Upon completion of the draft EA, the BLM or state SRS will transmit the document, along with any supporting documentation, to the LUC for review and comment.
 6. The LUC will assign a unique number to the LUR and enter the request for land use into the tracking system.
 7. The LUC will review the ECL and consult the cognizant NEPA Compliance Coordinator for environmental regulatory considerations.
 8. The NEPA Compliance Coordinator will convey any regulatory consideration regarding the proposed action to the LUC by way of a technical review.
 9. The LUC will append the technical review with any other land use considerations deemed proper and appropriate.
 10. The LUC will transmit to the BLM or state SRS, a recommendation to accept or reject the proposed action based upon the content of the review.
 11. If the regulatory considerations detailed in the technical review are significant, the BLM or state SRS will arrange a meeting with the affected requestor. The requestor(s) will be advised of the regulatory concerns of the proposed action.

12. If all regulatory considerations are addressed to the satisfaction of the DOE, the LUC will recommend the project for acceptance via a letter to the Environmental Programs Manager of the DOE Carlsbad Area Office (CAO).

13. The DOE Environmental Programs Manager, or the appointed designee, will transmit a letter to the BLM or state SRS, approving the proposed project, and will send a courtesy copy to the WIPP LUC.

LAND USE REQUEST REVIEW AND NOTIFICATION PROCESS

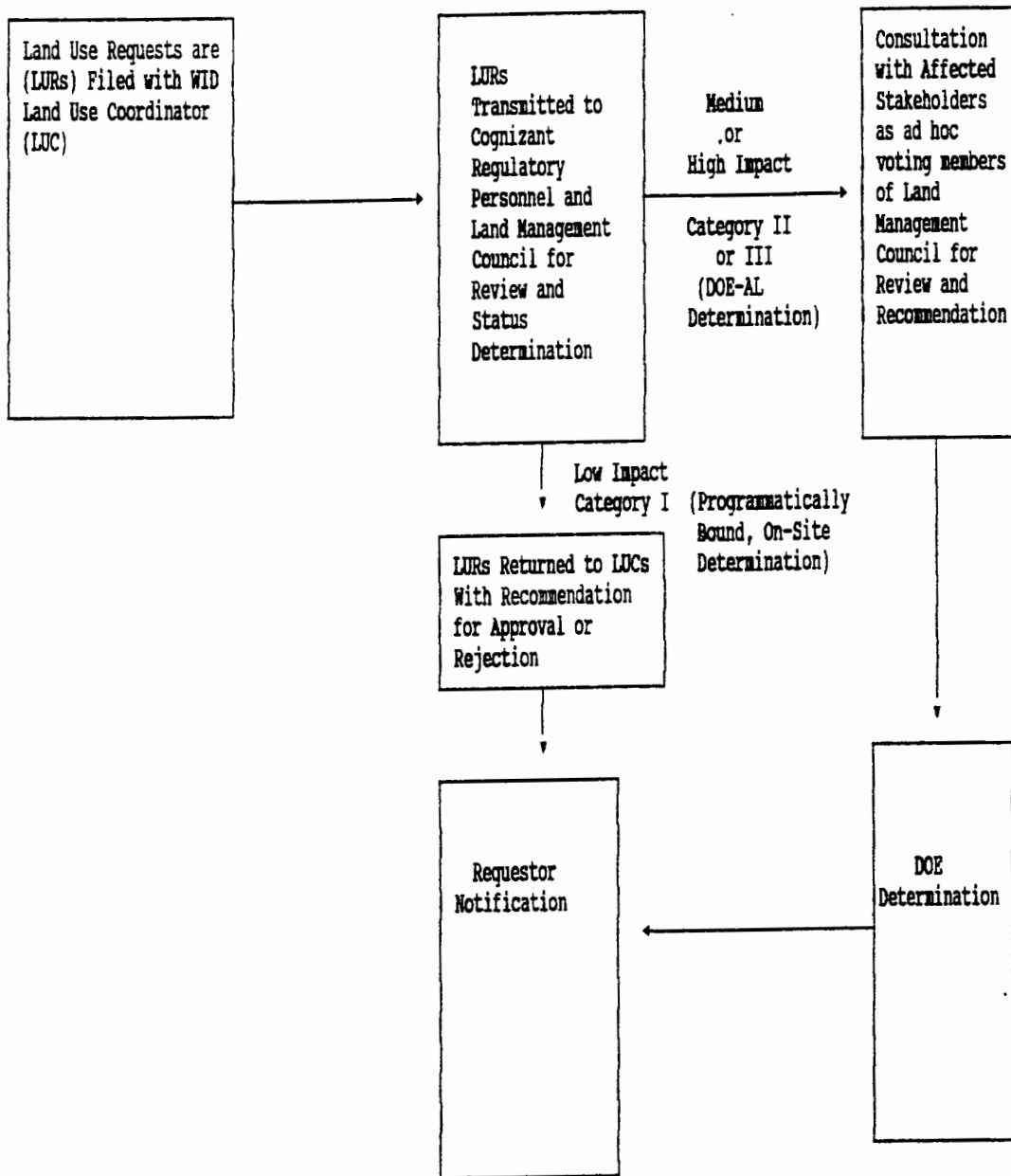


FIGURE 2.1

CHAPTER 3

EMERGENCY MANAGEMENT

CHAPTER 3

EMERGENCY MANAGEMENT

3.0 INTRODUCTION

Preparations have been made to minimize the impacts of an emergency at the WIPP. Such preparations include developing emergency plans and providing training for emergency responders. Discussions relating to Emergency Management at the WIPP are included in the LMP, Sections 2.7 and 3.8.

WP 12-9, "WIPP Emergency Plan and Procedures," was developed to provide a framework of the responsibilities, capabilities, and authorities for the members of the emergency response organization (ERO). The ERO members, for the purpose of this document, consist of the following personnel/teams:

- Emergency Services Technicians (ESTs)
- Emergency Response Team (ERT)
- Backshift Fire Brigade (BFB)
- Central Monitoring Room Operator (CMRO)
- Facility Operations Shift Supervisor (FOSS)
- RCRA Emergency Coordinators

3.0.1 Responsibilities

3.0.1.1 Emergency Services Technicians/Incident Commander

The on-site EST(s) is responsible for the overall incident command of an emergency until the emergency is mitigated. The EST is in charge of life and/or property threats that lie within the WLWA boundary (i.e., medical, rescue, fire, radiological, and hazardous materials). The EST may also be activated outside the WLWA boundary by the FOSS. Agreements, as listed in WP 12-9, WIPP Emergency Plan, pertaining to response outside the WLWA boundary, shall be accommodated at the discretion of the FOSS, in accordance with existing facility operations standing instructions, unless an on-site emergency takes priority over actions prescribed in the MOU.

3.0.1.2 Emergency Response Team

The ERT is trained to incident-specific response, including, but not limited to, medical/rescue, fire fighting, release of radioactive and/or hazardous materials/waste, and contaminated/injured personnel. The response to any one event by the team shall be in accordance with the applicable federal, state, or local standards and/or guidelines established for that response. The ERT responds to emergencies at the WIPP in accordance with prescribed procedures and training (e.g., Certification Card EST-01).

3.0.1.3 Backshift Fire Brigade

The BFB is comprised of security personnel. They provide fire, rescue, and medical response support to the EST from 4:00 p.m. until 7:30 a.m., Monday through Friday, and 24 hours a day on Saturday, Sunday, and holidays.

The BFB is trained to respond to fires (on site and off) in accordance with existing MOUs and/or mutual assistance agreements. Personnel of the BFB are trained in accordance with New Mexico Firefighter Level 1 training standards.

3.0.1.4 Central Monitoring Room Operator

The on-shift operator is responsible for Central Monitoring Room (CMR) operations. The CMRO, who reports directly to the FOSS, has the authority and responsibility to activate response personnel and organizations when notified of incidents that require immediate response (e.g., personnel injury, spills, fires, etc.) as directed by existing (in-place) emergency procedures (e.g., WP 12-ER manual).

3.0.1.5 Facility Operations Shift Supervisor

This position is staffed 24 hours a day. The FOSS is designated as the supervisor responsible for the overall day-to-day operation of the WIPP, including compliance with applicable Operational Safety Requirements as defined in the "Final Safety Analysis Report" (WP 02-9). The FOSS is the senior shift representative for WID management. The FOSS is

in charge of directing plant activities at the WIPP during emergencies until relieved by the Crisis Manager.

3.0.1.6 Resource Conservation and Recovery Act Emergency Coordinator/Crisis Manager

The RCRA Emergency Coordinator at the WIPP is the FOSS and the Crisis Manager during an activation of the Emergency Operations Center (EOC). There shall be a RCRA Emergency Coordinator on site at the WIPP facility 24 hours a day, seven days a week, with responsibility for coordinating all emergency response measures. The RCRA Emergency Coordinators are thoroughly familiar with the WIPP Contingency Plan (WP 02-12), TRU mixed waste and hazardous waste operations and activities at the WIPP facility, locations of TRU mixed waste and hazardous waste activities, locations on the site where hazardous materials are stored and used, and locations of waste staging and accumulation areas as identified in the Spill Prevention, Control, and Countermeasures Plan as found in RCRA Part B Permit Application. Persons qualified to act as the RCRA Emergency Coordinator have the authority to commit the necessary resources to implement the WIPP Contingency Plan.

3.0.1.7 Emergency Operations Center

The EOC is activated by the FOSS when emergency conditions arise that cannot be mitigated without additional resources to the FOSS. The EOC is minimally comprised of a Crisis Manager, an Operations representative, a Safety representative, and the EOC manager.

3.1 OBJECTIVES

The DOE's objective of facility emergency preparedness is to protect and provide a safe environment for WIPP employees, contractor personnel, visitors, and the members of the general public during such emergency situations as serious accidents, external disruptions, and natural disasters. These include wildland fires, hazardous material accidents, tornadoes, floods, lightning strikes, and earthquakes.

3.2 PLANNED ACTIONS

3.2.1 Fire

The DOE shall provide a fire management program that will ensure a timely, well-coordinated, and effective response to suppress any wildfires within the WLWA. Once the CMR has been notified of a fire requiring response by emergency personnel, the CMRO shall activate the EST, the ERT, and/or the BFB to mitigate the event. This includes activation to the WLWA boundary specified in the LMP.

The ERT/BFB will assemble at the Emergency Services Vehicle Bay to don personal protective equipment (PPE). The on-shift EST shall act as Incident Commander and direct all aspects of the fire response. The EST reports directly to the FOSS. Moreover, activation may proceed outside this area as part of existing MOUs.

3.2.1.1 Strategy

1. The DOE shall employ full suppression strategy for a wildfire within the WLWA by empowering the WIPP Incident Commander to coordinate fire management activities.
2. The DOE shall make a good-faith effort to acquire and maintain in a state of readiness the necessary resources to execute full suppression of a wildfire within the WLWA.
3. The DOE shall provide notice, within 90 days, to the New Mexico Energy, Minerals, and Natural Resources Department (EMNRD) Forestry and Resources Conservation Division regarding the status of any wildfire or prescribed burn within the WLWA.

3.2.2 Radioactive and Hazardous Materials

The initial response to any radioactive and/or HAZMAT incident shall be directed to protect human health, safety, and the environment. All radioactive and/or HAZMAT incident responses shall be conducted by personnel wearing the appropriate level of PPE as required by 29 CFR 1910.120.

The ERT shall provide initial response to spills that cannot be managed by the responsible individual(s). Upon request of the on-duty EST, after a spill has been stabilized,

any contamination will be removed by cognizant personnel. If necessary, the WIPP will use other resources (e.g., local fire departments, state police, subcontractors) to mitigate spills.

3.2.2.1 Strategy

The EST shall have the following duties during a spill of radioactive, hazardous, or potentially hazardous, materials.

1. Provide initial incident command of any emergency actions pertaining to releases or spills, radioactive materials, hazardous materials, or unknown substances.
2. Provide, if no emergency exists, medical surveillance and additional technical support for operations requiring a site-generated hazardous waste worker.
3. Advise the FOSS on conditions and progress.
4. Direct all operations involving releases that have the potential to harm responders involved in cleanup activities.
5. Complete proper HAZMAT forms as directed by WP 12-909, "Nonradioactive Hazardous Materials Spill Control."

CHAPTER 4

INDUSTRIAL SAFETY

CHAPTER 4
INDUSTRIAL SAFETY

4.0 INTRODUCTION

The industrial safety requirements for this section cover work performed by subcontractors, work performed on approved easements, work performed by WIPP employees, and recreational activities conducted within the boundaries of the WLWA. This program supplements WIPP policies contained in spill control plans (e.g., WP 12-909, "WIPP Hazardous Material Spill Response") and emergency response plans (e.g., WP 12-9, "WIPP Emergency Plan and Procedures") that relate to safe practices. The types of activities covered by this program include, but are not limited to:

- New construction work, including buildings, annexes, warehouses, storage areas, etc.
- Repairs or alterations
- Equipment installation and servicing
- Routine contract maintenance
- Remediation work
- Scrap and waste removal
- Security work
- Temporary contract personnel

- **Transportation (i.e., trucking and deliveries)**
- **Electrical, piping, rigging, roofing, etc.**
- **Environmental monitoring/land management work**

4.1 OBJECTIVES

The objective of the DOE is to provide and maintain a safe environment for any who wish to use WIPP lands. Additionally, the industrial safety program will define, for all WIPP subcontractors and members of the general public who wish to use WIPP lands, the safety and health policies, rules, and guidelines for minimizing unsafe conditions and acts that may result in personal injury and/or property damage. This program will provide a mechanism for subcontractors to communicate their safety and health concerns to WIPP safety and health personnel.

4.2 PLANNED ACTIONS

In order to maintain optimum conditions for a safe environment, the following shall be prohibited within the WLWA boundary:

- **Possession or use of alcoholic beverages**
- **Possession or use of a controlled substance**
- **Discarding refuse/trash within the WLWA**

Any activity (e.g., recreational hunting, camping, etc.) that is identified by the DOE as an imminent risk to the health and/or safety of WIPP personnel can, at the discretion of the DOE, be suspended indefinitely within the WLWA. Permanent prohibition of activities resulting in the contradiction and/or subsequent amending of the LMIP shall be considered only after a review by the LMC in consultation with affected stakeholders.

4.2.1 Work Performed by Waste Isolation Pilot Plant Employees

All work performed by WIPP employees shall comply with the requirements of the WIPP Safety Manual, WP 12-1 (available on request), and other applicable site requirements.

4.2.2 Safety Requirements for Subcontractors

When WIPP personnel perform work on the WIPP site or at off-site WIPP locations (e.g., groundwater surveillance well pads), their activities and equipment could affect subcontractor personnel and WIPP employees and property. Consequently, it is necessary that certain safety requirements be followed at all times when such operations are performed.

Work performed within the WLWA, whether initiated on a WID or SNL purchase requisition, shall comply with existing WIPP site safety requirements. Documentation for work performed on approved easements must be submitted to cognizant WIPP personnel for validation concerning the appropriate Occupational Safety and Health Administration (OSHA) requirements for the type of work to be performed.

Subcontractors who conduct permissible drilling activities (e.g., groundwater monitoring wells) within the WLWA will be held accountable for compliance with American Petroleum Institute (API) Recommended Practices for Occupational Safety for Well Drilling and Servicing Operations, API Recommended Practices 54 (RP54).

4.2.3 Policy

Each subcontractor and their respective affiliates (e.g. lower-tier subcontractors) shall comply with all local, state, and federal safety, health, and environmental regulations. The WIPP site representative (e.g., facility, work control, project engineer, or maintenance person in charge) shall provide the site safety rules for which the contractor will be held accountable, and shall verify the adherence to these rules by the subcontractor. Site safety rules range from providing proper eye protection to compliance with the lockout/tagout procedures (i.e., project-specific). The WIPP recognizes that the subcontractor may also require its employees to follow specific safety rules which exceed the WIPP rules. These will be acceptable, provided they do not conflict with WIPP site rules.

4.2.4 General Guidelines

Since unsafe practices by subcontractors could expose WIPP employees to injuries and illnesses, a person cognizant of work packages and purchase requisitions will designate a subcontract technical representative (STR). The STR will monitor the practices of the contractor and establish a mechanism to control subcontractor services to assure that such services are performed in a safe manner.

4.2.5 Prior to Commencement of Work

Prior to commencement of work, all subcontractors shall attend an on-site preconstruction and safety conference. Conferences for construction (Davis-Bacon) subcontractors shall be conducted by WID Procurement Services; those for maintenance contractors (non-Davis-Bacon) shall be conducted by the WIPP STR.

4.2.6 Submittals Required by Subcontractors

4.2.6.1 Construction Subcontractors (Davis-Bacon Work)

The Davis-Bacon Act (40 U.S.C. 276a-276a-7) is a federal law applicable to federally funded construction work in excess of \$2,000, which ensures that workers engaged in such construction work are not paid less than the scale of wages prevailing in the area in which the work is to be performed, as determined by the Department of Labor. Requisitions shall specify that each subcontractor shall provide WID Procurement Services the following information when bidding a project. This documentation will be reviewed and approved by the WID Industrial Safety Section.

1. Documentation of its previous three-year injury experience and a current OSHA 200 Log.
2. Historical information (last three years) on any OSHA citations and other regulatory inspection reports or citations relative to the type of work to be performed.

3. Confirmation of workers' compensation coverage or equivalent, including the experience modification rate and other specific insurance coverage.

4. Its written safety policy and programs, which would include, as appropriate, but not be limited to (training requirements and supporting documentation):
 - Hazard communication
 - Respirator protection
 - Respirator fit testing and medical approval
 - Driving powered-industrial trucks
 - Control of hazardous energy systems (lockout/tagout)
 - Confined space entry
 - PPE use

(WIPP personnel will have control of lockout/tagout procedures within the core or fenced area, and confined space entry procedures within the WLWA.)

5. Copies of the Material Safety Data Sheet (MSDS) for each chemical to be brought inside the WLWA. These MSDSs will be reviewed, evaluated, and approved by the WID industrial hygienist or designee before any chemical is permitted on WIPP lands. The contractor is responsible for removal and for cleaning up spills generated by their actions, including costs associated with the cleanup.

6. Written certification that all material-handling equipment (e.g., cranes, hoists, powered industrial trucks, chains, slings, spreaders) have been inspected and meet all requirements of Subpart N of both 29 CFR 1910 and 29 CFR 1926.
7. Written job hazard analysis for each phase of the work to be performed.

When specified in the subcontract, contractors shall supply work plans describing the type of work to be performed, the number of people performing task(s), their emergency action plan, their safety rules, and the names of responsible personnel.

Subcontractor personnel shall complete the appropriate WIPP training requirements prior to operating any WIPP site equipment, performing unescorted lockout/tagout functions within the fenced area, or entering any area within WIPP lands labeled as a confined space or meeting confined space criteria.

4.2.6.2 Maintenance Contractors (Non-Davis Bacon Work)

Maintenance contractors performing work within WIPP lands without active direction from the WIPP STR shall submit the same documentation required of the Davis-Bacon contractors (see above). When applicable, contractors operating under the direction of the site STR shall provide, for approval, to the WIPP STR and WID Industrial Safety the following:

1. Written documentation that all electrical hand tools have been tested as defined in OSHA 29 CFR 1926.404 (b).

2. Training records or confirmation of safety training for all employees as defined in OSHA 29 CFR 1926.21, "Safety Training and Education."
3. Copies of MSDSs for each chemical to be brought on site or to the project by the subcontractor.
4. Approved job hazard analysis or work instructions for each segment of work.

4.2.7 Waste Isolation Pilot Plant Responsibilities

4.2.7.1 Waste Isolation Division Procurement Services

WID Procurement Services shall provide:

1. The WIPP safety rules and procedures for subcontractors (available on request from the LUC);
2. Specific safety requirements for construction subcontractors meeting the Davis-Bacon criteria (available on request from the LUC);
3. Copies of all subcontract purchase requisitions to the WID Industrial Safety Section.

4.2.7.2 Waste Isolation Pilot Plant Subcontract Technical Representative Responsibilities

The WIPP STR shall:

- 1. Coordinate WIPP industrial safety issues with other site groups and subcontractors.**
- 2. Identify potential safety and exposure hazards that may interfere with the subcontractor while on the project.**
- 3. Require mitigating emergency response procedures relative to the scheduled work activities.**
- 4. Initiate stop work orders when OSHA, MSHA, or the WIPP safety rules are violated and report all stop work orders that impact subcontractors to the cognizant WID Procurement Services representative.**
- 5. Adhere to the existing system for maintenance of records regarding accident investigations, near-miss observations, injuries, and illnesses.**
- 6. Route all maintenance contractor (non-Davis-Bacon) submittals through the WID Environment, Safety, Health, and Regulatory Compliance (ESH&RC) Department for approval prior to commencement of work.**

4.2.8 Procedure for Reporting Accidents

- 1. The WIPP site-specific procedure for reporting accidents shall be used throughout the WLWA. All accidents involving injury or illness shall be reported immediately to the WIPP STR and the WIPP site medical personnel according to WP 12-918, "Reporting Occurrences in Accordance with DOE Order 5000.3B."**

- 2. Property damage caused by accidents shall be reported to the WIPP STR, who shall convey the information to appropriate management.**

- 3. Subcontractors shall post emergency numbers and ensure that such numbers are provided to all employees of lower-tier subcontractors.**

- 4. No off-site authorities shall be contacted prior to contacting the WIPP STR.**

- 5. Spills, releases to the environment, and other "off-normal" events are to be reported in accordance with WIPP procedures (e.g., WP 12-918, "Reporting Occurrences in Accordance with DOE Order 5000.3B")**

- 6. All information concerning injuries and/or illness involving their employees shall be recorded on their OSHA 200 Log or other appropriate record.**

4.2.9 Subcontractor Safety Procedures

When stipulated in the statement of work, all subcontractors shall include the following information in their bid package:

1. Medical surveillance and first aid plan
2. Electrical safety program
3. Hearing conservation program
4. Personal protection equipment program
5. Housekeeping program and inspection program
6. Hazardous waste disposal procedures

The statement of work for non-Davis-Bacon subcontractors whose employees are under the direction of a WIPP STR is not required to contain the above requirements because employees of such subcontractors are subject to WIPP safety programs.

4.2.9.1 Personal Protective Equipment

Subcontractors are responsible for providing WIPP-approved PPE to their employees. Any employee required to wear respiratory equipment shall have prior medical approval from a physician to wear such type of equipment, and be trained to wear it properly.

4.2.9.2 Safety Meetings

Subcontractors shall conduct safety meetings, the frequency of which will depend on the nature of the project, but at a minimum of weekly.

4.2.9.3 Subcontractor Procedures

Procedures of subcontractors shall not conflict with the WIPP site-specific procedures. In cases wherein procedures of subcontractors conflict with those of the WIPP, the WIPP STR will seek assistance and guidance from the WID ESH&RC Department.

4.2.10 Housekeeping Inspections

WIPP subcontractors and lower-tier subcontractors shall conduct daily safety checks of areas where their employees are working. Any unsatisfactory conditions shall be reported immediately to the WIPP STR. Corrective actions shall be taken immediately and documented on a daily safety inspection form.

Refuse and scraps that interfere with work flow and/or create fire hazards shall be disposed of properly in a timely manner and not allowed to accumulate.

Subcontractors shall not block aisles, walkways, stairs, etc. The WIPP STR shall be notified prior to the erection of any barricades or other efforts by the subcontractor to prevent entry into areas.

CHAPTER 5

MAINTENANCE AND WORK CONTROL

CHAPTER 5

MAINTENANCE AND WORK CONTROL

5.0 INTRODUCTION

Lands used in the operation of the WIPP are listed in one of two categories. The first consists of lands contained within the boundary of the WLWA. Inclusive in this area are roads, groundwater monitoring well pads, reclamation sites, and storage yards. Lands used in the operation of the WIPP outside the WLWA boundary consist primarily of access roads to groundwater well pads and a few isolated reclamation areas. [Note: roads and well pads used in the operation of the WIPP are identified in Figure 5.1.] The maintenance management program for all DOE facilities is consistent with DOE Order 4330.4A, "Maintenance Management Program." In accordance with this Order, property is maintained in a manner that promotes operational safety, worker health, environmental protection and compliance, property asset preservation, and cost effectiveness, while meeting the programmatic mission.

5.1 OBJECTIVES

The DOE maintenance objective (scope) is defined as the preventive, predictive, corrective, and service maintenance activities for facilities, equipment, and support infrastructure necessary to accomplish the WIPP mission.

The WID work control system is a management-directed and management-delegated system to control maintenance activities. It ensures that maintenance activities are effective in maintaining safe and reliable facility operation. This system applies to all personnel doing maintenance activities at the WIPP.

The WID work order system is the central component of the control system for maintenance activities at the WIPP. The work order system ensures that jobs are identified, logged, planned, scheduled, performed, tested, and formally accepted and documented in a systematic manner.

5.2 PLANNED ACTIONS

The WID has developed a phased process to implement the graded approach for WIPP maintenance activities. The phases are listed below.

Phase I	Assessment Criteria Development
Phase II	System Assessment and Classification
Phase III	Classification Equipment List Development
Phase IV	Priority System Development
Phase V	System Adjustments to Classification

A maintenance training program has been established through the central site training organization. The training organization maintains maintenance training programs that meet the intent of established industrial guidelines and address specific WIPP needs.

The WIPP facility's infrastructure and equipment shall be maintained by a proper balance of preventive, corrective, and predictive maintenance; procedures and standards; and configuration management. Maintenance activities are controlled by the WID work control system to ensure a safe and reliable facility operation. The work order, submitted in accordance with WP 10-WC3002, "Work Control Administration," is the fundamental form used in the work order system for:

1. Job planning and analysis
2. Permits
3. Work performance standards
4. Priority system
5. Scheduling
6. Construction program interface
7. Post-maintenance/modification testing

Maintenance activities in support of both the LMP and the LMIP shall be performed to the same criteria as established for the base facility (Property Protection Area). The expanded maintenance work scope as it pertains to land management activities includes, but is not limited to:

1. Maintenance of roads inside the WLWA.
2. Maintenance of the WIPP railroad easement and the corresponding frontage road.

3. Maintenance of DOE signs inside the WLWA.
4. Maintenance of signs outside the WIPP boundary on properties used in the operation of the WIPP (e.g., North Access Road).
5. Maintenance of the North Access Road.
6. Construction and maintenance of cattle guards inside the WLWA.
7. Construction and maintenance of cattle guards outside the WLWA on roads used expressly for WIPP operations.
8. Maintenance and oversight of the WIPP water line in accordance with commitments accommodated by way of Contract DE-AC04-85AL24138-M002.
9. Construction and maintenance of security/safety fences within the WLWA (e.g., the fence surrounding the Off-Limits Area, and the fences adjacent to the North Access Road that prevent livestock from wandering onto the road) or at remote locations outside the WLWA used in the operation of the WIPP.
10. Construction and maintenance of groundwater surveillance well pads and their corresponding access roads inside the WLWA.

11. Construction and maintenance of groundwater surveillance well pads and their corresponding access roads outside the WLWA. [Note: roads outside the WLWA, identified as part of the WIPP maintenance work scope, are limited to those which are intended exclusively for WIPP-related activities. Road maintenance of existing easements or rights-of-way, not constructed expressly for the WIPP uses but used as convenient access routes for WIPP-related activities, is not the responsibility of the WIPP.]