

**MEMO**

**TO:** Barbara Hoditschek  
**FROM:** Connie Walker  
**RE:** Weekly Report, September 18-22, 1995  
**DATE:** September 28, 1995

**cc:** B. Garcia  
S. Zappe

Attached please find the weekly report outlining activities performed during the week of September 18-22, for the NMED. Please feel free to contact me should you have any questions.

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**NMED SUPPORT  
WEEKLY STATUS REPORT**  
for the period:  
September 18 - September 22, 1995

Status of Work and Progress to Date

A.T.Kearney has begun technical review of the WIPP Part B Permit application, Revision 5, for the Disposal Phase. A work plan showing the tentative schedule for review completion was provided to NMED for review and comment. An initial, rough scan of Chapters A and C was completed to identify obvious issues and concerns, which were articulated in a memo provided to NMED on September 20, 1995. On September 21, 1995, a conference call was held between A.T.Kearney and NMED representatives to discuss these issues, and to determine courses of action for the forthcoming review of these Chapters. Detailed review of Chapters C and A was then initiated, as was initial review of Chapters D, I, and E.

Percentage of Work Completed and Status of the Schedule:

Total approximate expenditures to date (September 22, 1995), including state sales tax, are approximately \$7200, which is 4% of the estimated budget for Task 1. Approximately 86 hours have been expended on Task 1, to date.

Difficulties Encountered and Corrective Actions Taken:

No difficulties were encountered during the last reporting period. However, some questions requiring NMED attention are presented below, in the section entitled Additional Issues and Topics.

Work In Progress:

A rough scan review of Chapters B, D, E, and I is ongoing. Issues and concerns relative to Chapter B, D, E, and I contents are being formulated, and a memo articulating these issues will be provided to NMED on September 29, 1995. This memo is provided in preparation for the A.T.Kearney and NMED conference call on October 3, 1995 to discuss memo contents. Detailed review of Chapters A and C is ongoing.

Changes in Key Project Personnel:

No changes to key personnel have occurred.

Additional Issues and Topics:

A.T.Kearney requested copies of the TRU Waste QAPP (1995), Methods Manual, and PDP. The WAPP and Methods Manual were provided to A.T.Kearney by NMED on September

22; copies of these documents were made on this date, with the originals sent back to NMED and copies distributed to the appropriate review staff.

Specific format of review comments is requested. The following format options are offered:

**1. Chapter X, Section X-XX(X), Section Title, Page X-X, Lines X-X.** Cite the technical inadequacy noted within the referenced section and propose a remedy. Close by stating: Revise the permit application to .... (address the specific issue).

Alternatively, since these comments will initially be used as information requests rather than NOD comments, the following language may be more appropriate:

**2. Chapter X, Section X-XX(X), Section Title, Page X-X, Lines X-X.** Cite the technical inadequacy noted within the referenced section and propose a remedy. Close by stating: Provide the following information.... (address the specific issue).

It has been our experience that if NMED does not specifically request that the permit application be revised to include the information (e.g. to provide revised pages that address the issue), DOE will not revise the permit application and will instead address the issues as a letter response. NMED should determine the specific type of response format required by DOE, and direct A.T.Kearney as to the appropriate language for our review comments. In the past, we used Format 1, but the cover letter and title pages on the document provided to DOE identified this as an Information Request, rather than an NOD.

During our September 21, 1995 conference call, a number of action items and decisions were made to guide A.T.Kearney's review. These issues are identified below, to ensure that review proceeds along the agreed-upon course:

1. A.T.Kearney questioned the miscellaneous unit regulatory status of the Waste Handling Building (WHB) designated by DOE in the Part A, indicating that it is more appropriate to designate the building a waste storage area. NMED representatives indicated that the issue would be raised to Benito Garcia, who would provide the final decision. Pending receipt of this decision, A.T.Kearney will proceed under the assumption that the WHB should be considered a waste storage area/building, and will provide commentary accordingly.

2. A.T.Kearney indicated that waste to be managed within the WHB required additional specification, and verification of SIC codes should be conducted. NMED did not believe verification was necessary and A.T.Kearney, at the direction of NMED, will not evaluate SIC code adequacy.

3. A.T.Kearney indicated that waste codes identified within the Part A and C should be cross referenced for completeness. NMED representatives indicated that Steve

Zappe has already completed this task. At the direction of NMED, A.T.Kearney will not comment on this issue, and will integrate comments to be provided by Steve Zappe in the review deliverable.

4. A.T.Kearney indicated that clarification regarding the presence of a landfill and wastewater stabilization lagoon at the facility, which may be RCRA regulated, is required. NMED stated that their representatives will talk with DOE in this regard and provide clarification to A.T.Kearney. A.T.Kearney therefore will not, at the direction of NMED, evaluate the regulatory status of the landfill and wastewater stabilization units listed in the legend on Figure A2-2.

5. A.T.Kearney identified the need for photographs of the waste handling building. NMED representatives indicated that they will request this information from DOE. A.T.Kearney, therefore, will not, at the direction of NMED, provide a comment requesting the provision of this photograph.

6. A.T.Kearney pointed out that many analytical methods for CH and RH waste management have yet to be developed by DOE, and the permit application states that only DOE approval of the methods is necessary before implementation. Previously, NMED had indicated that if EPA approves the methods, NMED shall concur, but NMED representatives indicated that they will have to receive input from Benito Garcia in this regard. A.T.Kearney, therefore, will not, at the direction of NMED, provide commentary regarding the need for NMED and/or EPA approval of analytical method prior to implementation.

7. A.T.Kearney indicated that the WAP uses terms inconsistently and in an unclear fashion. NMED representatives indicated that Steve Zappe had made a list of terms, and would provide this to A.T.Kearney. In a later discussion with Barbara Hoditschek, it was clarified that A.T.Kearney should provide pertinent commentary regarding vagaries or inconsistencies of terminology within the WAP.

8. A.T.Kearney indicated that cross referencing of information in this version of the permit application with that of the previous application (test phase) was necessary to determine whether issues that were resolved through the test phase permit application review process remain resolved. That is, this is necessary to ensure that DOE submitted agreed-upon revisions, and did not go back to "square one" on some issues. In a later discussion with Barbara Hoditschek and Benito Garcia, it was clarified that A.T.Kearney should note those issues that are not consistent with previous agreements (which could, in some cases require some revisiting of the previous permit application, such as the WHB regulatory status). However, NMED indicated that detailed comparison of application contents would likely not prove necessary or fruitful. NMED representatives further clarified that since this application is considered a revision of previous permit application submissions, A.T.Kearney should not re-review sections of the permit application that are direct repeats of the last

permit application, under the assumption that we had already commented upon the section in previous activities, and the revised version incorporates our comments.

9. NMED directed A.T.Kearney to only "skim" appendices C1 and C2 (not conduct an extensive technical review), and to examine the need for including entire referenced documents, not just portions included as appendices. A.T.Kearney will, therefore, examine referenced documents as time permits for referenced information, and provide an estimate as to whether the entire document should be included. In a later discussion with Barbara Hoditschek, an extension of the deliverable due date from October 16 to October 24 was requested, with resulting shift of the ATK-NMED-DOE meetings from October 17-18 to October 25-26. NMED's decision regarding whether to modify the Chapter A and C deliverable due date is pending.