



MEMO

TO: Steve Zappe and Barbara Hoditschek

FROM: Connie Walker

RE: Working Draft; potential technical issues, all remaining Chapters

DATE: October 27, 1995

Attached is our working draft memo outlining major (and some minor) technical issues noted during our brief examination of all the remaining chapters of the Part B permit application for WIPP, Revision 5. This memo is to be considered a rough draft, and additional commentary (including major technical issue identification) could arise as a result of the detailed review. Additionally, these topics are meant to represent those issues that we believe could be problematic; detailed review of the Chapters could indicate that some of these are "non-issues". Please let me know if you have any questions.

208 10-28-95 [unclear] [unclear]

to [unclear] [unclear]



WIPP PART B APPLICATION REVIEW

CHAPTER F

General Comments and Issues

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1. ✓ While there appears to be no "show stoppers" in this Chapter, the Chapter is very vague and exceedingly general in the information provided for review. Inspection procedures and the description of equipment are very brief, poorly described, or not consistently identified. Table F-1, which addresses equipment and the inspection schedule associated with that equipment, does not appear to address all equipment specified in Chapter D. Underground fire fighting equipment, also lacks detail in the procedures and description of the equipment. Spill control procedures are not addressed in sufficient detail. Also, as in previous chapters, the referencing to other chapters is vague, and difficult to follow.
2. The application fails to address the potential for the generation of explosive gasses in the subsurface area. This should be addressed in Chapters F, G and I. Procedures to prevent hazards should describe how the facility will ensure that this will not occur. Chapter G must, in detail, describe how the incident will be managed, if it does occur.
3. A number of monitoring programs have been established at WIPP, that may or may not be related to this permit application. ✓ Some of these programs are discussed in other sections, but Chapter F can include inspection schedules for these programs, which it does not. NMED should determine whether these inspection schedules should be included in Chapter F.

The following are examples of the monitoring programs in question:

- ● Geomechanical Monitoring
- ● Air Monitoring
 - Aerosol sampling
 - Ambient sampling
 - Radiological Soil monitoring
 - Hydrologic Radioactivity monitoring
 - Surface water and Sediment Monitoring
 - Biotic Radiological Surveillance
 - Nonradiological Environmental Surveillance
 - Meteorological Monitoring
- ● Water-Quality Monitoring
- ● Wild-life Population Monitoring
- ● VOC monitoring

Handwritten note:
select ones
applicable to
RCRA

4. A.T. Kearney also seeks NMED guidance relative to how the issue of generation of explosive gasses should be approached in Chapters F and G.
Address mitigation of explosive gasses

CHAPTER G

General Comments and Issues

1. The materials covered by the Chapter G Contingency Plan emergency response procedures are inconsistently described. For example, Page G-3 implies that there is only one Contingency Plan that covers all emergency incidents at the facility. Page G-1, however, states that only emergencies involving hazardous waste or hazardous waste constituents are covered. Page G-2 then states that hazardous substances and hazardous materials are covered in addition to hazardous wastes, and further states that petroleum products are not covered by the Contingency Plan.
2. The Contingency Plan is unacceptably vague in its descriptions of procedures to respond to emergencies at the facility. While the plan is meant to cover emergencies related to both contact-handled, remote-handled, and non-radioactive hazardous wastes, the Contingency Plan only provides generic response procedures that apparently apply uniformly to these waste types. Since clearly different procedures would be required to manage these different waste types, Chapter G must be revised extensively to address specific hazards related to specific waste types (i.e., contact-handled, remote-handled, and non-radioactive) and provide more detailed descriptions of response activities.
3. Implementation of the Contingency Plan is poorly described throughout the document. Page G-1 states that the Plan will not be implemented when in-house resources are sufficient to control an emergency that doesn't threaten human health or the environment. Page G-8, however, states that the Contingency Plan will only be implemented if an emergency event requires notification of off-site public agencies, if the spill exceeds secondary containment, or the spill exceeds CERCLA reportable quantities. These criteria are clearly inadequate, since these three items do not include the spectrum of emergency incidents that could occur. Chapter G must be revised to clearly identify the specific criteria that will be used to determine when the Contingency Plan will or will not be implemented.
4. The Crisis Manager and his/her Emergency Management Team is not adequately discussed in the Contingency Plan. In fact, the Crisis Manager is not even mentioned until page G-8, and then is only briefly discussed.
5. The primary and alternate Emergency Coordinators are not clearly identified, and it is not clear how the Control Room Monitoring Operator will know who to call during an emergency incident. Additionally, the notification chain of command shown on figures and described in the text is contradictory.

- 6. For the most part, the list of emergency equipment available at the facility (Table G-2) is not sufficiently detailed.
- 7. Copies of the Memorandum of Understanding (MOU) between WIPP and off-site emergency response organizations are not included in the application. A description of the coordination agreements agreed upon for each agency is included in Chapter G. Does NMED specifically want copies of the MOUs, or is the description of the MOUs in the Contingency Plan adequate?

CHAPTER H
General Comments and Issues

- 1. The application does not specify the specific person which will be responsible for directing all training activities.
- 2. There are some problems associated with the training outlines, including the fact that the outline does not describe each of the topics that will be discussed during each course and the amount of time to be spent. It also appears that not all training courses associated with the management of hazardous waste have been addressed in the training section. The section does not demonstrate that each person filling each job position will be adequately and appropriately trained to perform his/her duties.

CHAPTER K
General Comments and Issues

- 1. No major comments or issues.

CHAPTER L
General Comments and Issues

- 1. Chapter L will need to be revised to conform with LDR/no migration determination language revisions required for Chapter C.

CHAPTER M
General Comments and Issues

- 1. No major comments or issues.