

- ① Have all rev 6.1 changes been made
- ② Have all rev 6.3 changes been made
- ③ Have the rev 6.4 changes been made
- ④ Does HZMB have
  - ✓ Contract Lab SOP's
  - ✓ latest GW Procedures
  - ✓ WAC Rev 5.0
  - ✓ QAPP Intern Release
  - ✓ WWS Controlled Documents
  - ✓ Methods Manual
- ⑤ Are All Appendices present & current
- ⑥ Is the correct Part A there
- ⑦ Are all chapters present
- ⑧ Topo maps
- ⑨ WQSP well locations.

9/15/97

Bo Korman  
notes



**RESPONSES TO THE NEW MEXICO ENVIRONMENT DEPARTMENT HAZARDOUS AND RADIOACTIVE MATERIAL BUREAU'S COMMENTS ON APPENDIX D18-- GROUNDWATER MONITORING PLAN FOR THE WASTE ISOLATION PILOT PLANT**

**RESPONSE:**

Section D18-8a(1) now includes the following text to clarify the importance of stabilization of groundwater prior to final sampling:

"A steady-state condition is determined by comparing serial sample parameters to an average of final-day serial sampling results for previous sampling rounds. A steady-state condition is considered to be reached when the majority of field indicator parameter analysis results fall within  $\pm 5$  percent of the average of analytical results for the indicator parameter from previous sampling rounds. Nonstabilization of two or fewer field indicator parameters attributable to matrix interferences, instrument drift, or other unforeseen reasons would not preclude the collection of final samples, provided the volume of purged water exceeds three well bore volumes."

This explanation fits best in this section instead of Section D18-6d(1). A forward reference to Section D18-8a(1) has been included in Sections D18-6d(1) and D18-6d(2).

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**GENERAL COMMENT 3:**

The GMP includes numerous tables, forms, etc., within Attachment A pertinent to samples collection/transfer, groundwater level monitoring, etc. The table within this attachment should be modified, as appropriate, to include wells in the GMP detection monitoring system.

**RESPONSE:**

Attachment A has been eliminated from the GMP since the WIPP Controlled Documents are routinely provided to the HRMB. Thus, the HRMB will always have the most current versions of these procedures. As of July 8, 1997, the most current versions are as follows:

✓ WP10-AD3029:	<u>Calibration and Control of Monitoring and Data Collection Equipment</u>	Revision 0
✓ WP02-EM3001:	<u>Administrative Processes for Environmental Monitoring Programs</u>	Revision 0
✓ WP02-EM1006:	<u>Final Sample and Serial Sample Collection</u>	Revision 1
✓ WP02- <sup>EM</sup> 1005	<u>Groundwater Serial Sample Analysis</u>	Revision 1

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**SUMMARY OF CHANGES MADE IN REVISIONS 6.1, 6.2, 6.3, AND 6.4 OF THE WIPP  
RCRA Permit Application**

<b>Part of Application Affected</b>	<b>Page and Description</b>	<b>Comments</b>
<b>Revision 6.1</b>		
Revised Part A	A-7 (Added 3 waste codes)	1 page affected, however, whenever the Part A is changed, the entire form must be resubmitted along with a new certification
Chapter C	C-14 (Regulatory citation corrected on line 28) C-26-27 (Text clarified on line 44 to line 1) C-36 (Word "discarded" deleted relative to records disposition on line 25) Table C-13 (Table revised to be consistent with DOE records retention policy)	Total of 5 pages affected
Chapter D	D-6 (Deleted emplacing the TRUPACT II as a waste container as an option at line 15) D-8 (Corrected typo at line 29) D-64 (Clarified backfill discussion at line 44) D-73 (Clarified room barricading process at line 28) Table D-6 (Updated values to be consistent with the NMVP) Figure D-11 (Clarified room barricade use) Figure D-17H (Figure left out of Revision 6.0) Figure D-17I (Figure left out of Revision 6.0) Figure D-34 (Removed booster fan)	Total of 9 pages affected
Chapter F	Table F-1 (Reorder table to match the forms in Appendix F1) Figures F-1 and F-2 (Captions reversed on some copies)	8 pages affected Note that Tables F-2 and F-3 were also resubmitted with Revision 6.1, although no changes were made on them.
Chapter I	I-6 Change wording regarding volume of waste at line 4)	1 page affected
Appendix D9	D9-30 (Revise table to be consistent with the NMVP)	1 page affected
Appendix D19	Last 43 pages were left out of Revision 6.0	43 pages affected
Appendix D20	Pages 3-8 and 3-9 were left out of Revision 6.0	2 pages affected
Appendix F1	F1-i (Table of contents corrected at line 41) No page number (Revised water level inspection form added)	2 pages affected
<b>Revision 6.2</b>		
Appendix D18	New Groundwater Monitoring Plan prepared	Total of 62 pages This submittal also included about a 750 pages of laboratory SOPs
<b>Revision 6.3</b>		
Chapter C	C-35 (Clarified electronic submittal beginning at line 12) C-45 (Clarified LDR exemption at line 13) Table C-6 (Deleted reference to no migration on all 5 pages of table) Table C-7 (Deleted reference to no migration on all 4 pages of table)	11 pages affected

Part of Application Affected	Page and Description	Comments
Chapter D	D-33 (Clarified use of speed governors etc. at line 31) D-51 (clarified action levels for chemical exposure at line 16) D-61 (clarified use of prefilters at line 26) D-63 (clarified facility pallet description at line 28) D-74 (Clarified switch to filtration at line 29) D-75 (Included planned upgrade at line 12) D-112 (Clarified values in table)	7 pages affected
Chapter F	F-18 (Clarified use of speed governor, etc. at line 20)	1 page affected
Chapter G	G-44 (Noted name changes at lines 15 and 23) G-49 (Noted name changes at lines 30 and 32) Table G-2 (Provided updated list of RCRA Emergency coordinators) Figure G-12 (Provided updated form -3 pages)	6 pages affected
Chapter I	I-20 (Corrected typo at line 44) I-32 (Corrected reference at line 27) I-37 (Deleted reference to NMVP) I-44 (Deleted reference at line 32) I-57 to I-58 (Added Table I-8 which was left out of Revision 6.0)	6 pages affected
Chapter J	Revised entire chapter to reflect changes in SWMUs	15 pages affected
Chapter L	Revised entire chapter to reflect LWA Amendment exemption to the LDRs	1 page affected
Appendix C4	C4-13 (Clarified coring text at line 18)	1 page affected
Appendix C8	C8-8 (clarified text regarding core choice at line 7) C8-21 (clarified text with regard to gas measurement at lines 12 and 21) <del>C8-22</del> C8-23 (Clarified data determinations in several places on page <del>C8-25</del> C8-25 (clarified electronic submittal at line 21)	4 pages affected
Appendix D9	D9-30 (corrected errors in Table) D9-Attachment 1-9 (Corrected OSHA PEL for 1,2-Dichloroethane)	2 pages affected
Appendix J1	J1-6 to J1-8(Added changes to shaft sumps)	3 pages affected
Appendix L1	Clarified LDR exemption	1 page affected
Appendix D5	New revision submitted	64 pages affected
Appendix D20	New revision submitted	25 pages affected
<b>Revision 6.4</b>		
Appendix D18	New revision submitted	142 pages affected