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APPENDIX M1

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CONTAINER STORAGE

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CONTAINER STORAGE

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1 **APPENDIX M1**

2 **CONTAINER STORAGE**

3 Introduction

4 Management and storage of transuranic (**TRU**) mixed waste in the Waste Isolation Pilot Plant
5 (**WIPP**) facility is subject to regulation under Title 20 of the New Mexico Administrative Code,
6 Chapter 4, Part 1 (20.4.1 NMAC), Subpart V. The technical requirements of 20.4.1.500 NMAC
7 (incorporating 40 CFR §§264.170 to 264.178 are applied to the operation of the Waste Handling
8 Building Container Storage Unit (**WHB Unit**)(Figure M1-1), and the Parking Area Container
9 Storage Unit (**Parking Area Unit**)(Figure M1-2). This Permit Attachment describes the
10 container storage units, the TRU mixed waste management facilities and operations, and
11 compliance with the technical requirements of 20.4.1 NMAC. The configuration of the WIPP
12 facility consists of completed structures, including all buildings and systems for the operation of
13 the facility.

14 M1-1 Container Storage

15 The waste containers that will be used at the WIPP facility qualify as “containers,” in accordance
16 with 20.4.1.101 NMAC (incorporating 40 CFR §260.10). That is, they are “portable devices in
17 which a material is stored, transported, treated, disposed of, or otherwise handled.”

18 M1-1a Containers with Residual Liquids

19 The Permit Treatment, Storage, and Disposal Facility (**TSDF**) Waste Acceptance Criteria
20 (**WAC**) and the Waste Analysis Plan (Permit Attachment B) prohibit the shipment of liquid
21 waste to the WIPP. This prohibition is enforced as a maximum residual liquids requirement. In
22 no case shall the total liquid equal or exceed one volume percent of the waste container (e.g.,
23 drum, standard waste box [**SWB**], or canister). Since the maximum amount of liquid is one
24 percent, calculations made to determine the secondary containment as required by 20.4.1.500
25 NMAC (incorporating §264.175) are based on ten percent of one percent of the volume of the
26 containers, or one percent of the largest container, whichever is greater.

27 M1-1b Description of Containers

28 20.4.1.500 NMAC (incorporating 40 CFR §264.171) requires that containers holding waste be in
29 good condition. Waste containers shall be in good condition prior to shipment from the generator
30 sites, i.e., containers will be of high integrity, intact, and free of surface contamination above
31 DOE limits. The Manager of the DOE Carlsbad Field Office has the authority to suspend a
32 generator’s certification to ship TRU mixed waste to the WIPP facility should the generator fail
33 to meet this requirement. The containers will be certified free of surface contamination above
34 DOE limits upon shipment. This condition shall be verified upon receipt of the waste at WIPP.
35 The level of rigor applied in these areas to ensure container integrity and the absence of external
36 contamination on both ends of the transportation process will ensure that waste containers

1 entering the waste management process line at WIPP meet the applicable Resource Conservation
2 and Recovery Act (**RCRA**) requirements for container condition.

3 M1-1b(1) CH TRU Mixed Waste Containers

4 Contact handled (**CH**) TRU mixed waste containers will be either 55-gal (208-L) drums singly
5 or arranged into 7-packs, 85-gal (321-L) drums singly or arranged into 4-packs, 100-gal (379 L)
6 drums singly or arranged into 3-packs, ten-drum overpacks (**TDOP**), or SWBs. A summary
7 description of each CH TRU mixed waste container type is provided below.

8 Standard 55-Gallon Drums

9 Standard 55-gal (208-L) drums meet the requirements for U.S. Department of Transportation
10 (**DOT**) specification 7A regulations.

11 A standard 55-gal (208-L) drum has a gross internal volume of 7.4 cubic feet (ft³) (0.210 cubic
12 meters (m³)). Figure M1-3 shows a standard TRU mixed waste drum. One or more filtered vents
13 (as described in Section M1-1d(1)) will be installed in the drum lid to prevent the escape of any
14 radioactive particulates and to eliminate any potential of pressurization.

15 Standard 55-gal (208-L) drums are constructed of mild steel and may also contain rigid, molded
16 polyethylene (or other compatible material) liners. These liners are procured to a specification
17 describing the functional requirements of fitting inside the drum, material thickness and
18 tolerances, and quality controls and required testing. A quality assurance surveillance program is
19 applied to all procurements to verify that the liners meet the specification.

20 Standard 55-gal (208-L) drums may be used to collect derived waste.

21 Standard Waste Boxes

22 The SWBs meet all the requirements of DOT specification 7A regulations.

23 One or more filtered vents (as described in Section M1-1d(1)) will be installed in the SWB body
24 and located near the top of the SWB to prevent the escape of any radioactive particulates and to
25 eliminate any potential of pressurization. They have an internal volume of 66.3 ft³ (1.88 m³).
26 Figure M1-4 shows a SWB.

27 The SWB is the largest container that may be used to collect derived waste.

28 Ten-Drum Overpack

29 The TDOP is a metal container, similar to a SWB, that meets DOT specification 7A and is
30 certified to be noncombustible and to meet all applicable requirements for Type A packaging.
31 The TDOP is a welded-steel, right circular cylinder, approximately 74 inches (in.) (1.9 meters
32 (m)) high and 71 in. (1.8 m) in diameter (Figure M1-5). The maximum loaded weight of a TDOP
33 is 6,700 pounds (lbs) (3,040 kilograms (kg)). A bolted lid on one end is removable; sealing is

1 accomplished by clamping a neoprene gasket between the lid and the body. One or more filter
2 vents are located near the top of the TDOP on the body to prevent the escape of any radioactive
3 particulates and to eliminate any potential of pressurization. A TDOP may contain up to ten
4 standard 55-gal (208-L) drums or one SWB. TDOPs may be used to overpack drums or SWBs
5 containing CH TRU mixed waste. The TDOP may also be direct loaded with CH TRU mixed
6 waste. Figure M1-5 shows a TDOP.

7 Eighty-Five Gallon Drum

8 The 85-gal (321-L) drums meet the requirements for DOT specification 7A regulations. One or
9 more filtered vents (as described in Section M1-1d(1)) will be installed in the 85-gal drum to
10 prevent the escape of any radioactive particulates and to eliminate any potential of
11 pressurization.

12 85-gal (321-L) drums are constructed of mild steel and may also contain rigid, molded
13 polyethylene (or other compatible material) liners. These liners are procured to a specification
14 describing the functional requirements of fitting inside the drum, material thickness and
15 tolerances, and quality controls and required testing. A quality assurance surveillance program is
16 applied to all procurements to verify that the liners meet the specification.

17 The 85-gal (321-L) drum, which is shown in Figure M1-6, will be used for overpacking
18 contaminated 55-gal (208 L) drums at the WIPP facility. The 85-gal drum may also be direct
19 loaded with CH TRU mixed waste.

20 85-gal (321-L) drums may be used to collect derived waste.

21 100-Gallon Drum

22 100-gal (379-L) drums meet the requirements for DOT specification 7A regulations.

23 A 100-gal (379-L) drum has a gross internal volume of 13.4 ft³ (0.38 m³). One or more filtered
24 vents (as described in Section M1-1d(1)) will be installed in the drum lid or body to prevent the
25 escape of any radioactive particulates and to eliminate any potential of pressurization.

26 100-gal (379-L) drums are constructed of mild steel and may also contain rigid, molded
27 polyethylene (or other compatible material) liners. These liners are procured to a specification
28 describing the functional requirements of fitting inside the drum, material thickness and
29 tolerances, and quality controls and required testing. A quality assurance surveillance program is
30 applied to all procurements to verify that the liners meet the specification.

31 100-gal (379-L) drums may be direct loaded.

1 M1-1b(2) RH TRU Mixed Waste Containers

2 Remote-Handled (**RH**) TRU mixed waste containers include RH TRU Canisters, which are
3 received at WIPP loaded singly in an RH-TRU 72-B cask, and 55-gallon drums, which are
4 received in a CNS 10-160B cask.

5 RH TRU Canister

6 The RH TRU Canister is a steel single shell container which is constructed to be of high
7 integrity. An example canister is depicted in Figure M1-16a. The RH TRU Canister is vented
8 and will have a nominal internal volume of 31.4 ft³ (0.89 m³) and shall contain waste packaged
9 in small containers (e.g., drums) or waste loaded directly into the canister.

10 Standard 55-Gallon Drums

11 Standard 55-gal (208-L) drums meet the requirements for U.S. Department of Transportation
12 (DOT) specification 7A regulations. A detailed description of a standard 55-gallon drum is
13 provided above. Up to ten 55-gallon drums containing RH TRU mixed waste are arranged on
14 two drum carriage units in the CNS 10-160B cask (up to five drums per drum carriage unit). The
15 drums are transferred to an RH TRU mixed waste Facility Canister that will contain three drums.

16 M1-1b(3) Container Compatibility

17 All containers will be made of steel, and some will contain rigid, molded polyethylene liners.
18 The compatibility study, documented in Appendix C1 of the WIPP RCRA Part B Permit
19 Application (DOE, 1997a), included container materials to assure containers are compatible with
20 the waste. Therefore, these containers meet the requirements of 20.4.1.500 NMAC
21 (incorporating 40 CFR §264.172).

22 M1-1c Description of the Container Storage Units

23 M1-1c(1) Waste Handling Building Container Storage Unit (WHB Unit)

24 The Waste Handling Building (**WHB**) is the surface facility where TRU mixed waste handling
25 activities will take place (Figure M1-1a). The WHB has a total area of approximately 84,000
26 square feet (ft²) (7,804 square meters (m²)) of which 26,151 ft² (2,430 m²) are designated for the
27 waste handling and container storage of CH TRU mixed waste and 17,403 ft² (1,617 m²) are
28 designated for handling and storage of RH TRU mixed waste, as shown in Figures M1-1, M1-
29 14a, and M1-17a, b, c, and d. These areas are being permitted as the WHB Unit. The concrete
30 floors are sealed with a coating that is sufficiently impervious to the chemicals in TRU mixed
31 waste to meet the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.175(b)(1)).

32 CH Bay Surge Storage Area

33 The Permittees will coordinate shipments with the generator/storage sites in an attempt to
34 minimize the use of surge storage. However, there may be circumstances causing shipments to

1 arrive that would exceed the maximum capacity of the CH Bay Storage Area. The Permittees
2 may use the CH Bay Surge Storage Area as specified in Module III (see Figure M1-1) only when
3 the maximum capacities in the CH Bay Storage Area (except for the Shielded Storage Room)
4 and the Parking Area Unit are reached and at least one of the following conditions is met:

- 5 • Surface or underground waste handling equipment malfunctions prevent the Permittees
6 from moving waste to disposal locations;
- 7 • Hoisting or underground ventilation equipment malfunctions prevent the Permittees from
8 moving waste into the underground;
- 9 • Power outages cause a suspension of waste emplacement activities;
- 10 • Inbound shipment delays are imminent because Parking Area Container Storage Unit
11 Surge Storage is in use; or
- 12 • Onsite or offsite emergencies cause a suspension of waste emplacement activities.

13 The Permittees must notify NMED and those on the e-mail notification list upon using the CH
14 Bay Surge Storage and provide justification for its use.

15 CH TRU Mixed Waste

16 The Contact-Handled Packages used to transport TRU mixed waste containers will be received
17 through one of three air-lock entries to the CH Bay of the WHB Unit. The WHB heating,
18 ventilation and air conditioning (**HVAC**) system maintains the interior of the WHB at a pressure
19 lower than the ambient atmosphere to ensure that air flows into the WHB, preventing the
20 inadvertent release of any hazardous or radioactive constituents contamination as the result of a
21 contamination event. The doors at each end of the air lock are interlocked to prevent both from
22 opening simultaneously and equalizing CH Bay pressure with outside atmospheric pressure. The
23 CH Bay houses two TRUPACT-II Docks (**TRUDOCKs**), each equipped with overhead cranes
24 for opening and unloading Contact-Handled Packages. The TRUDOCKs are within the
25 TRUDOCK Storage Area of the WHB Unit.

26 The cranes are rated to lift the Contact-Handled Packaging lids as well as their contents. The
27 cranes are designed to remain on their tracks and hold their load even in the event of a design-
28 basis earthquake.

29 Upon receipt and removal of CH TRU mixed waste containers from the Contact-Handled
30 Packaging, the waste containers are required to be in good condition as provided in Permit
31 Module III. The waste containers will be visually inspected for physical damage (severe rusting,
32 apparent structural defects, signs of pressurization, etc.) and leakage to ensure they are good
33 condition prior to storage. Waste containers will also be checked for external surface
34 contamination. If a primary waste container is not in good condition, the Permittees will
35 overpack the container, repair/patch the container in accordance with 49 CFR §173 and §178
36 (e.g., 49 CFR §173.28), or return the container to the generator. The Permittees may initiate local
37 decontamination, return unacceptable containers to a DOE generator site or send the Contact-
38 Handled Package to the third party contractor. Decontamination activities will not be conducted
39 on containers which are not in good condition, or which are leaking. If local decontamination

1 activities are opted for, the work will be conducted in the WHB Unit on the TRUDOCK. These
2 processes are described in Section M1-1d. The area previously designated as the Overpack and
3 Repair Room will not be used for TRU mixed waste management in any instances.

4 Once unloaded from the Contact-Handled Packaging, CH TRU mixed waste containers (7-packs,
5 3-packs, 4-packs, SWBs, or TDOPs) are placed in one of two positions on the facility pallet or
6 on a containment pallet. The waste containers are stacked, on the facility pallets (one- or two-
7 high, depending on weight considerations). Waste on containment pallets will be stacked one-
8 high. The use of facility or containment pallets will elevate the waste at least 6 in. (15 cm) from
9 the floor surface. Pallets of waste will then be relocated to the CH Bay Storage Area of the WHB
10 Unit for normal storage. This CH Bay Storage Area, which is shown in Figure M1-1, will be
11 clearly marked to indicate the lateral limits of the storage area. This CH Bay Storage Area will
12 have a maximum capacity of 13 pallets (4,160 ft³ [118 m³]) of TRU mixed waste containers
13 during normal operations.

14 In addition, four Contact-Handled Packages, containing up to eight 7-packs, 3-packs, 4-packs,
15 SWBs, or four TDOPs, may occupy positions at the TRUDOCKs. If waste containers are left in
16 this area, they will be in the Contact-Handled Package with or without the shipping container lids
17 removed. The maximum volume of waste in containers in four Contact-Handled Packages is 640
18 ft³ (18.1 m³).

19 The Derived Waste Storage Area of the WHB Unit is on the north wall of the CH Bay. This area
20 will contain containers up to the volume of a SWB for collecting derived waste from all TRU
21 mixed waste handling processes in the WHB Unit. The Derived Waste Storage Area is being
22 permitted to allow containers in size up to a SWB to be used to accumulate derived waste. The
23 volume of TRU mixed waste stored in this area will be up to 66.3 ft³ (1.88 m³). The derived
24 waste containers in the Derived Waste Storage Area will be stored on standard drum pallets,
25 which are polyethylene trays with a grated deck, which will elevate the derived waste containers
26 approximately 6 in. (15 cm) from the floor surface, and provide approximately 50 gal (190 L) of
27 secondary containment capacity.

28 Aisle space shall be maintained in all WHB Unit TRU mixed waste storage areas. The aisle
29 space shall be adequate to allow unobstructed movement of fire-fighting personnel, spill-control
30 equipment, and decontamination equipment that would be used in the event of an off-normal
31 event. An aisle space of 44 in. (1.1 m) between facility pallets will be maintained in all WHB
32 Unit TRU mixed waste storage areas. An aisle space of 60 in. (1.5 m) will be maintained
33 between the west wall of the CH Bay and facility pallets.

34 The WHB has been designed to meet DOE design and associated quality assurance requirements.
35 Table M1-1 summarizes basic design requirements, principal codes, and standards for the WIPP
36 facility. Appendix D2 of the WIPP RCRA Part B Permit Application (DOE, 1997a) provided
37 engineering design-basis earthquake and tornado reports. The design-basis earthquake report
38 provides the basis for seismic design of WIPP facility structures, including the WHB foundation.
39 The WIPP design-basis earthquake is 0.1 g. The WIPP design-basis tornado includes a maximum
40 windspeed of 183 mi per hr (mi/hr) (294.5 km/hr), which is the vector sum of all velocity

1 components. It is also limited to a translational velocity of 41 mi/hr (66 km/hr) and a tangential
2 velocity of 124 mi/hr (200 km/hr). Other parameters are a radius of maximum wind of 325 ft
3 (99 m), a pressure drop of 0.5 lb per in.² (3.4 kilopascals [kPa]), and a rate-of-pressure drop of
4 0.09 lb/in.²/s (0.6 kPa/s). A design-basis flood report is not available because flooding is not a
5 credible phenomenon at the WIPP facility. Design calculations for the probable maximum
6 precipitation (**PMP**) event, provided in Appendix D7 of the WIPP RCRA Part B Permit
7 Application (DOE, 1997a), illustrated run-on protection for the WIPP facility.

8 The following are the major pieces of equipment that will be used to manage CH TRU mixed
9 waste in the container storage units. A summary of equipment capacities, as required by
10 20.4.1.500 NMAC is included in Table M1-2.

11 TRUPACT-II Type B Packaging

12 The TRUPACT-II (Figure M1-8a) is a double-contained cylindrical shipping container 8 ft
13 (2.4 m) in diameter and 10 ft (3 m) high. It meets NRC Type B shipping container requirements
14 and has successfully completed rigorous container-integrity tests. The payload consists of
15 approximately 7,265 lbs (3,300 kg) gross weight in up to fourteen 55-gal (208-L) drums, eight
16 85-gal (322-L) drums, six 100-gal (379-L) drums, two SWBs, or one TDOP.

17 HalfPACT Type B Packaging

18 The HalfPACT (Figure M1-8b) is a double-contained right cylindrical shipping container 7.8 ft
19 (2.4 m) in diameter and 7.6 ft (2.3 m) high. It meets NRC Type B shipping container
20 requirements and has successfully completed rigorous container-integrity tests. The payload
21 consists of approximately 7,600 lbs (3,500 kg) gross weight in up to seven 55-gal (208-L) drums,
22 one SWB, or four 85-gallon drums.

23 Unloading Docks

24 Each TRUDOCK is designed to accommodate up to two Contact-Handled Packages. The
25 TRUDOCK functions as a work platform, providing TRU mixed waste handling personnel easy
26 access to the container during unloading operations (see Figure M1-1a) (Also see Drawing 41-
27 M-001-W in Appendix D3 of the WIPP RCRA Part B Permit Application (DOE, 1997a)).

28 Forklifts

29 Forklifts will be used to transfer the Contact-Handled Packages into the WHB Unit and may be
30 used to transfer palletized CH TRU mixed waste containers to the facility transfer vehicle.
31 Another forklift will be used for general-purpose transfer operations. This forklift has
32 attachments and adapters to handle individual TRU mixed waste containers, if required.

33 Cranes and Adjustable Center-of-Gravity Lift Fixtures

34 At each TRUDOCK, an overhead bridge crane is used with a specially designed lift fixture for
35 disassembly of the Contact-Handled Packages. Separate lifting attachments have been

1 specifically designed to accommodate SWBs and TDOPs. The lift fixture, attached to the crane,
2 has built-in level indicators and two counterweights that can be moved to adjust the center of
3 gravity of unbalanced loads and to keep them level.

4 Facility or Containment Pallets

5 The facility pallet is a fabricated steel unit designed to support 7-packs, 4-packs, or 3-packs of
6 drums, SWBs, or TDOPs, and has a rated load of 25,000 lbs. (11,430 kg). The facility pallet will
7 accommodate up to four 7-packs, four 3-packs, or four 4-packs of drums or four SWBs (in two
8 stacks of two units), two TDOPs, or any combination thereof. Loads are secured to the facility
9 pallet during transport to the emplacement area. Facility pallets are shown in Figure M1-10. Fork
10 pockets in the side of the pallet allow the facility pallet to be lifted and transferred by forklift to
11 prevent direct contact between TRU mixed waste containers and forklift tines. This arrangement
12 reduces the potential for puncture accidents. Facility pallets may also be moved by facility
13 transfer vehicles. WIPP facility operational documents define the operational load of the facility
14 pallet to ensure that the rated load of a facility pallet is not exceeded.

15 Containment pallets are fabricated units having a containment capacity of at least ten percent of
16 the volume of the containers and designed to support a minimum of either a single drum, a single
17 SWB or a single TDOP. The pallets will have a rated load capacity of equal to or greater than the
18 gross weight limit of the container(s) to be supported on the pallet. Loads are secured to the
19 containment pallet during transport. A typical containment pallet is shown in Figure M1-10a.
20 Fork pockets in the side of the pallet allow the containment pallet to be lifted and transferred by
21 forklift. WIPP facility operational documents define the operational load of the containment
22 pallet to assure that the rated load of a containment pallet is not exceeded.

23 Facility Transfer Vehicle

24 The facility transfer vehicle is a battery or electric powered automated vehicle that either
25 operates on tracks or has an on-board guidance system that allows the vehicle to operate on the
26 floor of the WHB. It is designed with a flat bed that has adjustable height capability and may
27 transfer waste payloads on facility pallets or off the facility pallet stands in the CH Bay storage
28 area, and on and off the waste shaft conveyance by raising and lowering the bed (see
29 Figure M1-11).

30 RH TRU Mixed Waste

31 The RH TRU mixed waste is handled and stored in the RH Complex of the WHB Unit which
32 comprises the following locations: RH Bay (12,552 ft² (1,166 m²)), the Cask Unloading Room
33 (382 ft² (36 m²)), the Hot Cell (1,841 ft² (171 m²)), the Transfer Cell (1,003 ft² (93 m²)) (Figures
34 M1-17a, b and c), and the Facility Cask Loading Room (1,625 ft² (151 m²)) (Figure M1-17d).

35 The RH Bay (Figure M1-14a) is a high-bay area for receiving casks and subsequent handling
36 operations. The trailer carrying the RH-TRU 72-B or CNS 10-160B shipping cask (Figures M1-
37 18, M1-19, M1-20 and M1-21) enters the RH Bay through a set of double doors on the east side
38 of the WHB. The RH Bay houses the Cask Transfer Car. The RH Bay is served by the RH Bay

1 Overhead Bridge Crane used for cask handling and maintenance operations. Storage in the RH
2 Bay occurs in the RH-TRU 72-B or CNS 10-160B casks. The storage occurs after the trailer
3 containing the cask is moved into the RH Bay and prior to moving the cask into the Cask
4 Unloading Room to stage the waste for disposal operations. A maximum of two loaded casks and
5 one 55-gallon drum for derived waste (156 ft³ (4.4 m³)) may be stored in the RH Bay.

6 The Cask Unloading Room (Figure M1-17a) provides for transfer of the RH-TRU 72-B cask to
7 the Transfer Cell, or the transfer of drums from the CNS 10-160B cask to the Hot Cell. Storage
8 in the Cask Unloading Room will occur in the RH-TRU 72-B or CNS 10-160B casks. Storage in
9 this area typically occurs at the end of a shift or in an off-normal event that results in the
10 suspension of waste handling operations. A maximum of one cask (74 ft³ (2.1 m³)) may be stored
11 in the Cask Unloading Room.

12 The Hot Cell (Figure M1-17b) is a concrete shielded room in which drums of RH TRU mixed
13 waste will be transferred remotely from the CNS 10-160B cask, staged in the Hot Cell, and
14 loaded into a Facility Canister. The loaded Facility Canister is then lowered from the Hot Cell
15 into the Transfer Cell Shuttle Car containing a Shielded Insert. Storage in the Hot Cell occurs in
16 either drums or Facility Canisters. Drums that are stored are either on the drum carriage unit that
17 was removed from the CNS 10-160B cask or in a Facility Canisters. A maximum of 12 55-gallon
18 drums and one 55-gallon drum for derived waste (94.9 ft³ (2.7 m³)) may be stored in the Hot
19 Cell.

20 The Transfer Cell (Figure M1-17c) houses the Transfer Cell Shuttle Car, which moves the RH-
21 TRU 72-B cask or Shielded Insert into position for transferring the canister to the Facility Cask.
22 Storage in this area typically occurs at the end of a shift or in an off-normal event that results in
23 the suspension of a waste handling evolution. A maximum of one canister (31.4 ft³ (0.89 m³))
24 may be stored in the Transfer Cell in the Transfer Cell Shuttle Car.

25 The Facility Cask Loading Room (Figure M1-17d) provides for transfer of a canister to the
26 Facility Cask for subsequent transfer to the waste shaft conveyance and to the Underground
27 Hazardous Waste Disposal Unit (**HWDU**). The Facility Cask Loading Room also functions as an
28 air lock between the Waste Shaft and the Transfer Cell. Storage in this area typically occurs at
29 the end of a shift or in an off-normal event that results in the suspension of waste handling
30 operations. A maximum of one canister (31.4 ft³ (0.89 m³)) may be stored in the Facility Cask
31 (Figure M1-23) in the Facility Cask Loading Room.

32 Following is a description of major pieces of equipment that are used to manage RH TRU mixed
33 waste in the WHB Unit. A summary of equipment capacities, as required by 20.4.1.500 NMAC,
34 is included in Table M1-3.

35 Casks

36 The RH-TRU 72-B cask (Figure M1-20) is a cylinder designed to meet U.S. Department of
37 Transportation (**DOT**) Type B shipping container requirements. It consists of a separate inner
38 vessel within a stainless steel, lead-shielded outer cask protected by impact limiters at each end,

1 made of stainless steel skins filled with polyurethane foam. The inner vessel is made of stainless
2 steel and provides an internal containment boundary and a cavity for the payload. Neither the
3 outer cask nor the inner vessel is vented. Payload capacity of each RH-TRU 72-B shipping cask
4 is 8,000 lbs (3,628 kg). The payload consists of a canister of RH TRU mixed waste, which may
5 contain up to 31.4 ft³ (0.89 m³) of directly loaded waste or waste in smaller containers.

6 The CNS 10-160B cask (Figure M1-21) is designed to meet DOT Type B container requirements
7 and consists of two carbon steel shells and a lead shield, welded to a carbon steel bottom plate. A
8 12-gauge stainless steel thermal shield surrounds the cask outer shell, which is equipped with
9 two steel-encased, rigid polyurethane foam impact limiters attached to the top and bottom of the
10 cask. The CNS 10-160B cask is not vented. Payload capacity of each CNS 10-160B cask is
11 14,500 lbs (6,577 kg). The payload consists of up to ten 55-gallon drums.

12 Shielded Insert

13 The Shielded Insert (Figure M1-30) is specifically designed to be used in the Transfer Cell to
14 hold and transport loaded Facility Canisters from the Hot Cell until loaded into the Facility Cask.
15 The Shielded Insert, designed and constructed similar to the RH-TRU 72-B shipping cask, has a
16 29 in. inside diameter with an inside length of 130.5 in. to accommodate the Facility Canister,
17 which is 28.5 in. in diameter by 117.5 in. long. The Shielded Insert is installed on and removed
18 from the Transfer Cell Shuttle Car in the same manner as the RH-TRU 72-B shipping cask.

19 CNS 10-160B Drum Carriage

20 The CNS 10-160B drum carriage (Figure M1-25) is a steel device used to handle drums in the
21 CNS 10-160B cask. The drum carriages are stacked two high in the CNS 10-160B cask during
22 shipment. They are removed from the cask using a below-the-hook lifting device termed a
23 pentapod. The drum carriage is rated to lift up to five drums with a maximum weight of 1000
24 pounds each.

25 RH Bay Overhead Bridge Crane

26 In the RH Bay, an overhead bridge crane is used to lift the cask from the trailer and place it on
27 the Cask Transfer Car. It is also used to remove the impact limiters from the casks and the outer
28 lid of the RH-TRU 72-B cask.

29 Cask Lifting Yoke

30 The lifting yoke is a lifting fixture that attaches to the RH Bay Overhead Bridge Crane and is
31 designed to lift and rotate the RH-TRU 72-B cask onto the Cask Transfer Car.

32 Cask Transfer Cars

33 The Cask Transfer Cars (Figures M1-22a and M1-22b) are self-propelled, rail-guided vehicles,
34 that transport casks between the RH Bay and the Cask Unloading Room.

1 6.25 Ton Grapple Hoist

2 A 6.25 Ton Grapple Hoist is used to hoist the canister from the Transfer Cell Shuttle Car into the
3 Facility Cask.

4 Facility Canister

5 The Facility Canister is a cylindrical container designed to hold three 55-gallon drums of either
6 RH TRU waste or dunnage (Figure M1-16).

7 Facility Cask

8 The Facility Cask body consists of two concentric steel cylinders. The annulus between the
9 cylinders is filled with lead, and gate shield valves are located at either end. Figure M1-23
10 provides an outline configuration of the Facility Cask. The canister is placed inside the Facility
11 Cask for shielding during canister transfer from the RH Complex to the Underground HWDU for
12 emplacement.

13 Facility Cask Transfer Car

14 The Facility Cask Transfer Car (Figure M1-24) is a self-propelled rail car that is used to move
15 the Facility Cask between the Facility Cask Loading Room and the Shaft Station in the
16 underground.

17 Hot Cell Bridge Crane

18 The Hot Cell Bridge Crane, outfitted with a rotating block and the Hot Cell Facility Grapple, will
19 be used to lift the CNS 10-160B lid and the drum carriage units from the cask located in the Cask
20 Unloading Room, into the Hot Cell. The Hot Cell Bridge Crane is also used to lift the empty
21 Facility Canisters into place within the Hot Cell, move loaded drums into the Facility Canister,
22 and lower loaded Facility Canisters into the Transfer Cell.

23 Overhead Powered Manipulator

24 The Overhead Powered Manipulator is used in the Hot Cell to lift individual drums from the
25 drum carriage unit and lower each drum into the Facility Canister and support miscellaneous Hot
26 Cell operations.

27 Manipulators

28 There is a maximum of two operational sets of fixed Manipulators in the Hot Cell. The
29 Manipulators collect swipes of drums as they are being lifted from the drum carriage unit and
30 transfer the swipes to the Shielded Material Transfer Drawer and support Hot Cell operations.

1 Shielded Material Transfer Drawer

2 The Shielded Material Transfer Drawer is used to transfer swipe samples obtained by the fixed
3 Manipulators to the Hot Cell Gallery for radiological counting and transferring small equipment
4 into and out of the Hot Cell.

5 Closed-Circuit Television Cameras

6 The Closed-Circuit Television Camera system is used to monitor operations throughout the Hot
7 Cell and Transfer Cell. These cameras are used to perform inspections of waste containers and
8 waste management areas. This camera system is operated from the shielded room in the Facility
9 Cask Loading Room and Hot Cell Gallery. The camera system will have a video recording
10 capability as an operational aid. This video recording capability will be available in the Transfer
11 Cell by December 31, 2006, and in the Hot Cell prior to the initial receipt of RH TRU waste in
12 the Hot Cell. The Transfer Cell may be used without video recording capability before December
13 31, 2006.

14 Transfer Cell Shuttle Car

15 The Transfer Cell Shuttle Car (Figure M1-31) positions the loaded RH-TRU 72-B cask and
16 Shielded Insert within the Transfer Cell.

17 Cask Unloading Room Crane

18 The Cask Unloading Room Crane lifts and suspends the RH-TRU 72-B cask or Shielded Insert
19 from the Transfer Car and lowers the cask or Shielded Insert into the Transfer Cell Shuttle Car.

20 Facility Cask Rotating Device

21 The Facility Cask Rotating Device, a floor mounted hydraulically operated structure, is designed
22 to rotate the Facility Cask from the horizontal position to the vertical position for waste canister
23 loading and then back to the horizontal position after the waste canister has been loaded into the
24 Facility Cask (Figure M1-32).

25 M1-1c(2) Parking Area Container Storage Unit (Parking Area Unit)

26 The parking area south of the WHB (see Figure M1-2) will be used for storage of waste
27 containers within sealed shipping containers awaiting unloading. The area extending south from
28 the WHB within the fenced enclosure identified as the Controlled Area on Figure M1-2 is
29 defined as the Parking Area Unit. The Parking Area Unit provides storage space for up to 6,734
30 ft³ (191 m³) of TRU mixed waste, contained in up to 40 loaded Contact-Handled Packages and 8
31 Remote-Handled Packages. Secondary containment and protection of the waste containers from
32 standing liquid are provided by the Contact-Handled or Remote-Handled Packaging. Wastes
33 placed in the Parking Area Unit will remain sealed in their Contact-Handled or Remote-Handled
34 Packages, at all times while in this area.

1 The Nuclear Regulatory Commission (**NRC**) Certificate of Compliance requires that sealed
2 Contact-Handled or Remote-Handled Packages which contain waste be vented every 60 days to
3 avoid unacceptable levels of internal pressure. During normal operations the maximum residence
4 time of any one container in the Parking Area Unit is typically five days. Therefore, during
5 normal waste handling operations, no Contact-Handled or Remote-Handled Packages will
6 require venting while located in the Parking Area Unit. Any off-normal event which results in
7 the need to store a waste container in the Parking Area Unit for a period of time approaching
8 fifty-nine (59) days shall be handled in accordance with Section M1-1e(2) of this Permit
9 Attachment. Under no circumstances shall a Contact-Handled or Remote-Handled Package be
10 stored in the Parking Area Unit for more than fifty-nine (59) days after the date that the inner
11 containment vessel of the Contact-Handled or Remote-Handled Package was sealed at the
12 generator site.

13 Parking Area Surge Storage

14 The Permittees will coordinate shipments with the generator/storage sites in an attempt to
15 minimize the use of surge storage. However, there may be circumstances causing shipments to
16 arrive that would exceed the maximum capacity of the Parking Area. The Permittees may use the
17 Parking Area Surge Storage as specified in Module III (see Figure M1-2) only when the
18 maximum capacity in the Parking Area is reached and at least one of the following conditions is
19 met:

- 20 • Surface or underground waste handling equipment malfunctions prevent the Permittees
21 from moving waste to disposal locations;
- 22 • Hoisting or underground ventilation equipment malfunctions prevent the Permittees from
23 moving waste into the underground;
- 24 • Power outages cause a suspension of waste emplacement activities;
- 25 • Inbound shipment delays are imminent because the Parking Area is full (not applicable to
26 RH TRU waste shipments); or
- 27 • Onsite or offsite emergencies cause a suspension of waste emplacement activities.

28 The Permittees must notify NMED and those on the e-mail notification list upon using the
29 Parking Area Surge Storage and provide justification for its use.

30 M1-1d Container Management Practices

31 20.4.1.500 NMAC (incorporating 40 CFR §264.173) requires that containers be managed in a
32 manner that does not result in spills or leaks. Containers are required to be closed at all times,
33 unless waste is being placed in the container or removed. Because containers at the WIPP will
34 contain radioactive waste, safety concerns require that containers be continuously vented to
35 obviate the buildup of gases within the container. These gases could result from radiolysis, which
36 is the breakdown of moisture by radiation. The vents, which are nominally 0.75 in. (1.9
37 centimeters [cm]) in diameter, are generally installed on or near the lids of the containers. These
38 vents are filtered so that gas can escape while particulates are retained.

1 TRU mixed waste containers, containing off-site waste, are never opened at the WIPP facility.
2 Derived waste containers are kept closed at all times unless waste is being added or removed.

3 Off-normal events could interrupt normal operations in the waste management process line.
4 These off normal events fall into the following categories:

- 5 • Waste management system equipment malfunctions
- 6 • Waste shipments with unacceptable levels of surface contamination
- 7 • Hazardous Waste Manifest discrepancies that are not immediately resolved
- 8 • A suspension of emplacement activities for regulatory reasons

9 Shipments of waste from the generator sites will be stopped in any event which results in an
10 interruption to normal waste handling operations that exceeds three days.

11 Prior to receipt of TRU mixed waste at the WIPP facility, waste operators will be thoroughly
12 trained in the safe use of TRU mixed waste handling and transport equipment. The training will
13 include both classroom training and on-the-job training.

14 M1-1d(1) Derived Waste

15 The WIPP facility operational philosophy is to introduce no new hazardous chemical
16 components into TRU mixed waste or TRU mixed waste residues that could be present in the
17 controlled area. This will be accomplished principally through written procedures and the use of
18 Safe Work Permits (SWP)¹ and Radiological Work Permits (RWP)² which govern the activities
19 within a controlled area involving TRU mixed waste. The purpose of this operating philosophy is
20 to avoid generating TRU mixed waste that is compositionally different than the TRU mixed
21 waste shipped to the WIPP facility for disposal.

22 Some additional TRU mixed waste, such as used personal protective equipment, swipes, and
23 tools, may result from decontamination operations and off-normal events. Such waste will be
24 assumed to be contaminated with RCRA-regulated hazardous constituents in the TRU mixed
25 waste containers from which it was derived. Derived waste may be generated as the result of

¹ SWPs are prepared to assure that any hazardous work (not already covered by a procedure) is performed with due precaution. SWPs are issued by the Permittees after a job supervisor completes the proper form detailing the job location, work description, personnel involved, specific hazards involved, and protective requirements. The Permittees review the form, check on the adequacy of the protective measures, and if sufficient, approve the work permit. Conditions of the SWPs must be met while any hazardous work is proceeding. Examples of activities covered by the SWP program include confined space entry, overhead work, and work on energized equipment.

² RWPs are used to control entry into and performance of work within. Managers responsible for work within a CA must generate a work permit that specifies the work scope, limiting conditions, dosimetry, respiratory protection, protective clothing, specific worker qualifications, and radiation safety technician support. RWPs are approved by the Permittees after thorough review. No work can proceed in a CA without a valid RWP.

1 decontamination activities during the waste handling process. Should decontamination activities
2 be performed, water and a cleaning agent such as those listed in Permit Attachment F will be
3 used. Derived waste will be considered acceptable for management at the WIPP facility, because
4 any TRU mixed waste shipped to the facility will have already been determined to be acceptable
5 and because no new constituents will be added. Data on the derived waste will be entered into
6 the WWIS database. Derived waste will be contained in standard DOT approved Type A
7 containers.

8 The Safety Analysis Report (DOE 1997b) for packaging requires the lids of TRU mixed waste
9 containers to be vented through high efficiency particulate air (**HEPA**)-grade filters to preclude
10 container pressurization caused by gas generation and to prevent particulate material from
11 escaping. Filtered vents used in CH TRU mixed waste containers (55-gal (208-L) drums, 85-gal
12 (321 L) drums, 100-gal (379-L) drums, TDOPs, and SWBs) have an orifice approximately
13 0.375-in. (9.53-millimeters) in diameter through which internally generated gas may pass. The
14 filter media can be any material (e.g., composite carbon, sintered metal).

15 As each derived waste container is filled, it will be closed with a lid containing a HEPA-grade.
16 filter and moved to an Underground Hazardous Waste Disposal Unit (**HWDU**) using the same
17 equipment used for handling TRU mixed waste.

18 M1-1d(2) CH TRU Mixed Waste Handling

19 CH TRU mixed waste containers will arrive by tractor-trailer at the WIPP facility in sealed
20 shipping containers (e.g., TRUPACT-IIIs or HalfPACTs) (see Figure M1-12), at which time they
21 will undergo security and radiological checks and shipping documentation reviews. A forklift
22 will remove the Contact-Handled Packages and will transport them a short distance through an
23 air lock that is designed to maintain differential pressure in the WHB. The forklift will place the
24 shipping containers at one of the two TRUDOCKs in the TRUDOCK Storage Area of the WHB
25 Unit, where an external survey of the Contact-Handled Package inner vessel (see Figure M1-8a
26 and M1-8b) will be performed as the outer containment vessel lid is lifted. The inner vessel lid
27 will be lifted under the TRUDOCK Vent Hood System (**VHS**), and the contents will be surveyed
28 during and after this lift. The TRUDOCK VHS³ is attached to the Contact-Handled Package to

³ The TRU mixed waste container headspace may contain radiologically contaminated airborne dust particles.

1. Without the TRUDOCK VHS, a potential mechanism will exist to spread contamination (if present) in the immediate CH TRU mixed waste handling area, because lid removal will immediately expose headspace gases to prevailing air currents induced by the building ventilation system.
2. With the VHS, a confined and controlled set of prevailing air currents will be induced by the system blower. The TRUDOCK VHS will function as a local exhaust system to effectively control radiologically contaminated airborne dust particles (and VOCs) at essentially atmospheric pressure conditions.

Functionally, the TRUDOCK VHS will draw the TRU mixed waste container headspace gases, convey them through a HEPA filter, and ultimately duct them through the WHB exhaust ventilation system. VOCs will pass through the HEPA filter and will be conveyed to the ventilation exhaust duct system. The system principally consists of a functional aggregation of 1) vent hood assembly, 2) HEPA filter assemblies (to capture any airborne radioactive particles), 3) blower (to provide forced airflow), 4) ductwork, and 5) flexible hose.

1 provide atmospheric control and confinement of headspace gases at their source. It also prevents
2 potential personnel exposure and facility contamination due to the spread of radiologically
3 contaminated airborne dust particles and minimizes personnel exposure to VOCs.

4 Contamination surveys at the WIPP facility are based in part on radiological surveys used to
5 indicate potential releases of hazardous constituents from containers by virtue of detection of
6 radioactive contamination (see Permit Attachment I3). Radiological surveys may be applicable to
7 most hazardous constituent releases except the release of gaseous VOCs from TRU mixed waste
8 containers. Radiological surveys provide the WIPP facility with a very sensitive method of
9 indicating the potential release of nongaseous hazardous constituents through the use of surface
10 sampling (swipes) and radioactivity counting. Radiological surveys are used in addition to the
11 more conventional techniques such as visual inspection to identify spills.

12 Under normal operations, it is not expected that the waste containers will be externally
13 contaminated or that removable surface contamination on the shipping package or the waste
14 containers will be in excess of the DOE's free release limits (i.e.; < 20 disintegrations per minute
15 (**dpm**)⁴ per 100 cm² alpha or < 200 dpm per 100 cm² beta/gamma). In such a case, no further
16 decontamination action is needed. The shipping package and waste container will be handled
17 through the normal process. However, should the magnitude of contamination exceed the free
18 release limits, yet still fall within the criteria for small area "spot" decontamination (i.e., less than
19 or equal to 100 times the free release limit and less than or equal to 6 ft² [0.56 m²]), the shipping
20 package or the waste container will be decontaminated. Decontamination activities will not be
21 conducted on containers which are not in good condition, or containers which are leaking.
22 Containers which are not in good condition, and containers which are leaking, will be
23 overpacked, repaired/patched in accordance with 49 CFR §173 and §178 (e.g., 49 CFR §173.28),
24 or returned to the generator. In addition, if during the waste handling process at the WIPP a
25 waste container is breached, it will be overpacked, repaired/patched in accordance with 49 CFR
26 §173 and §178 (e.g., 49 CFR §173.28), or returned to the generator. Should WIPP structures or
27 equipment become contaminated, waste handling operations in the affected area will be
28 immediately suspended.

29 Decontamination activities will use water and cleaning agents (see Permit Attachment F) so as to
30 not generate any waste that cannot be considered derived waste. Items that are radiologically
31 contaminated are also assumed to be contaminated with the hazardous wastes that are in the
32 container involved in the spill or release. A complete listing of these waste components can be
33 obtained from the WIPP Waste Identification System (**WWIS**), as described in Permit
34 Attachment B, for the purpose of characterizing derived waste.

35 It is assumed that the process of decontamination will remove the hazardous waste constituents
36 along with the radioactive waste constituents. To provide verification of the effectiveness of the

⁴ The unit "dpm" stands for "disintegration per minute" and is the rate of emission by radioactive material as determined by correcting the counts per minute observed by an appropriate detector for background, efficiency, and geometric factors associated with the instrumentation.

1 removal of hazardous waste constituents, once a contaminated surface is demonstrated to be
2 radiologically clean, the “swipe” will be sent for analysis for hazardous constituents. The use of
3 these confirmation analyses is as follows:

4 **For waste containers**, the analyses becomes documentation of the condition of the container at
5 the time of emplacement. The presence of hazardous waste constituents on a container after
6 decontamination will be at trace levels and will likely not be visible and will not pose a threat to
7 human health or the environment. These containers will be placed in the underground without
8 further action once the radiological contamination is removed unless there is visible evidence of
9 hazardous waste spills or hazardous waste on the container and this contamination is considered
10 likely to be released prior to emplacement in the underground.

11 **For area contamination**, once the area is cleaned up and is shown to be radiologically clean, it
12 will be sampled for the presence of hazardous waste residues. If the area is large, a sampling plan
13 will be developed which incorporates the guidance of EPA’s SW 846 in selecting random
14 samples over large areas. Selection of constituents for sampling analysis will be based on
15 information (in the WWIS) about the waste that was spilled and information on cleanup
16 procedures. If the area is small, swipes will be used. If the results of the analysis show that
17 residual contamination remains, a decision will be made whether further cleaning will be
18 beneficial or whether final clean up shall be deferred until closure. For example, if hazardous
19 constituents react with the floor coating and are essentially nonremovable without removing the
20 coating, then clean up will be deferred until closure when the coatings will be stripped. In any
21 case, appropriate notations will be entered into the operating record to assure proper
22 consideration of formerly contaminated areas at the time of closure. Furthermore, measures such
23 as covering, barricading, and/or placarding will be used as needed to mark areas that remain
24 contaminated.

25 Small area decontamination, if needed, will occur in the area in which it is detected for
26 contamination that is less than 6 ft² (0.56 m²) in area and is less than 100 times the free release
27 limit. The free release limit is defined by DOE Orders as alpha contamination less than 20
28 dpm/100 cm² and beta-gamma contamination less than 200 dpm/100 cm². Overpacking would
29 occur in the event the WIPP staff damages an otherwise intact container during handling
30 activities. In such a case, a radiological boundary will be established, inside which all activities
31 are carefully controlled in accordance with the protocols for the cleanup of spills or releases. A
32 plan of recovery will be developed and executed, including overpacking the damaged container
33 in either a 85-gal (321 L) drum, SWB, or a TDOP. The overpacked container will be properly
34 labeled and sent underground for disposal. The area will then be decontaminated and verified to
35 be free of contamination using both radiological and hazardous waste sampling techniques
36 (essentially, this is done with “swipes” of the surface for counting in sensitive radiation detection
37 equipment or, if no radioactivity is present, by analysis for hazardous waste by an offsite
38 laboratory).

39 In the event a large area contamination is discovered within a Contact-Handled Package during
40 unloading, the waste will be left in the Contact-Handled Package and the shipping container will

1 be resealed. The DOE considers such contamination problems the responsibility of the shipping
2 site. Therefore, the shipper will have several options for disposition. These are as follows:

- 3 • The Contact-Handled Package can be returned to the shipper for decontamination and
4 repackaging of the waste. Such waste would have to be re-approved prior to shipment to
5 the WIPP.
- 6 • Shipment to another DOE site for management in the event the original shipper does not
7 have suitable facilities for decontamination. If the repairing site wishes to return the
8 waste to WIPP, the site will have to meet the characterization requirements of the WAP.
- 9 • The waste could go to a third (non-DOE) party for decontamination. In such cases, the
10 repaired shipment would go to the original shipper and be recertified prior to shipment to
11 the WIPP.

12 Written procedures specify materials, protocols, and steps needed to put an object into a safe
13 configuration for decontamination of surfaces. A RWP will always be prepared prior to
14 decontamination activities. TRU mixed waste products from decontamination will be managed
15 as derived waste.⁵

16 The TRUPACT-II may hold up to two 7-packs, two 4-packs, two 3-packs, two SWBs, or one
17 TDOP. A HalfPACT may hold seven 55-gal (208-L) drums, one SWB, or four 85-gallon drums.
18 An overhead bridge crane will be used to remove the contents of the Contact-Handled Package
19 and place them on a facility pallet. The containers will be visually inspected for physical damage
20 (severe rusting, apparent structural defects, signs of pressurization, etc.) and leakage to ensure
21 they are in good condition prior to storage. Waste containers will also be checked for external
22 surface contamination. If a primary waste container is not in good condition, the Permittees will
23 overpack the container, repair/patch the container in accordance with 49 CFR §173 and §178
24 (e.g., 49 CFR §173.28), or return the container to the generator.

25 For inventory control purposes, TRU mixed waste container identification numbers will be
26 verified against the Uniform Hazardous Waste Manifest and the WWIS. Inconsistencies will be
27 resolved with the generator before TRU mixed waste is emplaced. Discrepancies that are not
28 resolved within 15 days will be reported to the NMED in accordance with 20.4.1.500 NMAC
29 (incorporating 40 CFR §264.72).

30 Each facility pallet has two recessed pockets to accommodate two sets of 7-packs, two sets of 4-
31 packs, two sets of 3-packs, or two SWBs stacked two-high, two TDOPs, or any combination
32 thereof. Each stack of waste containers will be secured prior to transport underground (see

⁵ Note that the DOE had previously proposed use of an Overpack and Repair Room to deal with major decontamination and overpacking activities. The DOE has eliminated the need for this area by: 1) limiting the size of contamination events that will be dealt with as described in this section, and 2) by performing overpacking at the point where a need for overpacking is identified instead of moving the waste to another area of the WHB. This strategy minimizes the spread of contamination.

1 Figure M1-10). A forklift or the facility transfer vehicle will transport the loaded facility pallet to
2 the conveyance loading room located adjacent to the Waste Shaft. The conveyance loading room
3 serves as an air lock between the CH Bay and the Waste Shaft, preventing excessive air flow
4 between the two areas. The facility transfer vehicle will be driven onto the waste shaft
5 conveyance deck, where the loaded facility pallet will be transferred to the waste shaft
6 conveyance, and the facility transfer vehicle will be backed off. Containers of CH TRU mixed
7 waste (55-gal (208 L) drums, SWBs, 85-gal (321 L) drums, 100-gal (379-L) drums, and TDOPs)
8 can be handled individually, if needed, using the forklift and lifting attachments (i.e., drum
9 handlers, parrot beaks).

10 The waste shaft conveyance will lower the loaded facility pallet to the Underground HWDUs.
11 Figure M1-13 is a flow diagram of the CH TRU mixed waste handling process.

12 M1-1d(3) RH TRU Mixed Waste Handling

13 The RH TRU mixed waste will be received in the RH-TRU 72-B cask or CNS 10-160B cask
14 loaded on a trailer, as illustrated in process flow diagrams in Figures M1-26 and M1-27,
15 respectively. These are shown schematically in Figures M1-28 and M1-29. Upon arrival at the
16 gate, external radiological surveys, security checks, shipping documentation reviews are
17 performed and the Uniform Hazardous Waste Manifest is signed. The generator's copy of the
18 Uniform Hazardous Waste Manifest is returned to the generator. Should the results of the
19 contamination survey exceed acceptable levels, the shipping cask and transport trailer remain
20 outside the WHB in the Parking Area Unit, and the appropriate radiological boundaries (i.e.,
21 ropes, placards) are erected around the shipping cask and transport trailer. A determination will
22 be made whether to return the cask to the originating site or to decontaminate the cask.

23 Following cask inspections, the shipping cask and trailer are moved into the RH Bay or held in
24 the Parking Area Unit. The waste handling process begins in the RH Bay where the impact
25 limiter(s) are removed from the shipping cask while it is on the trailer. Additional radiological
26 surveys are conducted on the end of the cask previously protected by the impact limiter(s) to
27 verify the absence of contamination. The cask is unloaded from the trailer using the RH Bay
28 Overhead Bridge Crane and placed on a Cask Transfer Car.

29 RH-TRU 72-B Cask Unloading

30 The Cask Transfer Car then moves the RH-TRU 72-B cask to a work stand in the RH Bay. The
31 work stand allows access to the head area of the RH-TRU 72-B cask for conducting radiological
32 surveys, performing physical inspections or minor maintenance, and decontamination, if
33 necessary. The outer lid bolts on the RH-TRU 72-B cask are removed, and the outer lid is
34 removed to provide access to the lid of the cask inner containment vessel. The RH-TRU 72-B
35 cask is moved into the Cask Unloading Room by a Cask Transfer Car and is positioned under the
36 Cask Unloading Room Bridge Crane. The Cask Unloading Room Bridge Crane attaches to the
37 RH-TRU 72-B cask and lifts and suspends the RH-TRU 72-B cask to clear the Cask Transfer
38 Car. The RH-TRU 72-B cask is aligned over the Cask Unloading Room port.

1 The Cask Unloading Room shield valve is opened, and the cask is lowered through the port into
2 the Transfer Cell Shuttle Car. The Cask Unloading Room Bridge Crane is unhooked and
3 retracted, and the Cask Unloading Room shield valve is closed. After the cask is lowered into the
4 Transfer Cell Shuttle Car, the bolts on the lid of the cask inner containment vessel are loosened
5 by a robotic Manipulator. The Transfer Cell Shuttle Car is then aligned directly under the
6 Transfer Cell shield valve in preparation for removing the inner vessel lid and transferring the
7 canister to the Facility Cask. Operations in the Transfer Cell are monitored by closed-circuit
8 video cameras.

9 Using the remotely-operated fixed 6.25 Ton Grapple Hoist in the Facility Cask Loading Room,
10 the inner vessel lid is lifted clear of the RH-TRU 72-B cask, and the robotic Manipulator takes
11 swipe samples and places them in a swipe delivery system for counting outside the Transfer Cell.
12 If found to be contaminated above acceptable levels, the Permittees have the option to
13 decontaminate or return the RH TRU Canister to the generator/storage site or another site for
14 remediation. If no contamination is found, the Transfer Cell Shuttle Car moves a short distance,
15 and the inner vessel lid is lowered onto a stand on the Transfer Cell Shuttle Car. The canister is
16 transferred to the Facility Cask as described below.

17 CNS 10-160B Cask Unloading

18 After the lid bolts are removed, the CNS 10-160B cask is moved using the Cask Transfer Car
19 from the RH Bay into the Cask Unloading Room and centered beneath the Hot Cell shield plug
20 port. The Cask Unloading Room shield door is closed, and the inner and outer Hot Cell shield
21 plugs are removed simultaneously and set aside on the floor of the Hot Cell using the remotely
22 operated Hot Cell Bridge Crane. The Hot Cell Bridge Crane is then lowered through the Hot Cell
23 port and is connected to the CNS 10-160B cask lid rigging or lifting device. The Hot Cell Bridge
24 Crane lifts the CNS 10-160B cask lid through the Hot Cell port and sets the lid aside on the Hot
25 Cell floor.

26 Operations in the Hot Cell are monitored by closed-circuit television cameras. The drum carriage
27 unit lifting fixture (hereafter referred to as lifting fixture) is attached to the Hot Cell Bridge
28 Crane and lowered through the Hot Cell port. The lifting fixture is connected to the upper drum
29 carriage unit contained in the CNS 10-160B cask. The Hot Cell Bridge Crane lifts the upper
30 drum carriage unit from the CNS 10-160B cask through the port into the Hot Cell and sets it near
31 the Hot Cell inspection station. The Hot Cell Bridge Crane again lowers the lifting fixture
32 through the Hot Cell port and connects to the lower drum carriage unit. The Hot Cell Bridge
33 Crane lifts the lower drum carriage unit from the CNS 10-160B cask through the port into the
34 Hot Cell and sets it near the upper drum carriage unit.

35 The Hot Cell Bridge Crane lifts the CNS 10-160B cask lid from the Hot Cell floor, lowers it
36 through the Hot Cell port and onto the top of the CNS 10-160B cask. The inner and outer Hot
37 Cell shield plugs are replaced simultaneously. The Cask Unloading Room shield door is opened,
38 and the CNS 10-160B cask is moved into the RH Bay using the Cask Transfer Car. The CNS 10-
39 160B cask is inspected and surveyed, the lid and impact limiter are reinstalled on the CNS 10-
40 160B cask, and it is prepared for transportation off-site.

1 The Hot Cell Bridge Crane connects to an empty Facility Canister, places it into a sleeve at the
2 inspection station, and removes the canister lid. The Overhead Powered Manipulator or Hot Cell
3 Crane lifts one drum from the drum carriage unit. The Hot Cell Manipulators collect swipe
4 samples from the drum and transfer the swipes via the Transfer Drawer to the Hot Cell Gallery
5 for counting. If the 55-gallon drums are contaminated, the Permittees may decontaminate the 55-
6 gallon drums or return them to the generator/storage site or another site for remediation. The
7 drum identification number is recorded, and the recorded numbers are verified against the
8 WWIS. If there are any discrepancies, the drum(s) in question are stored within the Hot Cell, and
9 the generator/storage site is contacted for resolution. Discrepancies that are not resolved within
10 15 days will be reported to the NMED as required by 20.4.1.500 NMAC (incorporating 40 CFR
11 §264.72).

12 Either the Overhead Powered Manipulator or Hot Cell Bridge Crane lowers the drum into the
13 Facility Canister. This process is repeated to place three drums in the Facility Canister. The Hot
14 Cell Bridge Crane or powered Manipulator lifts the canister lid and places it onto the Facility
15 Canister. The lid is locked in place using a Manipulator. Each CNS 10-160B cask shipment will
16 contain up to ten drums. Drums will be managed in sets of three. If there is a tenth drum, it will
17 be placed in a Facility Canister or stored until WIPP receipt of the next CNS 10-160B cask
18 shipment. The Hot Cell Bridge Crane lifts the Facility Canister and lowers it into the Transfer
19 Cell.

20 To prepare to transfer a loaded Facility Canister from the Hot Cell to the Transfer Cell, a
21 Shielded Insert is placed onto a Cask Transfer Car in the RH Bay. The Cask Transfer Car is then
22 moved into the Cask Unloading Room and positioned under the Cask Unloading Room Bridge
23 Crane. The Bridge Crane attaches to the Shielded Insert. The Cask Unloading Room Bridge
24 Crane lifts and suspends the Shielded Insert clear of the Cask Transfer Car. The Shielded Insert
25 is aligned over the Cask Unloading Room port. The floor valve is opened, and the Shielded
26 Insert is lowered into the Transfer Cell Shuttle Car. The Cask Unloading Room Bridge Crane is
27 unhooked and retracted, and the Cask Unloading Room shield valve is closed. The Shielded
28 Insert is positioned under the Hot Cell port.

29 The Hot Cell Bridge Crane lifts a loaded, closed Facility Canister and positions it over the Hot
30 Cell port. The Hot Cell shield valve is opened, and the crane lowers the Facility Canister through
31 the port into the Shielded Insert positioned in the Transfer Cell Shuttle Car in the Transfer Cell.
32 The Hot Cell Bridge Crane is disconnected from the Facility Canister and raised until the crane
33 hook clears the Hot Cell shield valve. The Hot Cell shield valve is then closed.

34 Transfer of Disposal Canister into the Facility Cask

35 The transfer of a canister into the Facility Cask from the Transfer Cell is monitored by closed-
36 circuit television cameras. The Transfer Cell Shuttle Car positions the RH-TRU 72-B cask or
37 Shielded Insert under the Facility Cask Loading Room port and the shield valve is opened. Then
38 the remotely operated 6.25 Ton Grapple Hoist attaches to the canister, and the canister is lifted
39 through the open shield valve into the vertically-oriented Facility Cask located on the Cask
40 Transfer Car in the Facility Cask Loading Room. During this cask-to-cask transfer, the

1 telescoping port shield is in contact with the underside of the Facility Cask to assure shielding
2 continuity, as does the shield bell located above the Facility Cask.

3 For canisters received at the WIPP from the generator site in a RH-TRU 72-B cask, the
4 identification number is verified using cameras, which also provide images of the canister
5 surfaces during the lifting operation. Identification numbers are verified against the WWIS. If
6 there are any discrepancies, the canister is returned to the RH-TRU 72-B cask, returned to the
7 Parking Area Unit, and the generator is contacted for resolution. Discrepancies that are not
8 resolved within 15 days will be reported to the NMED as required by 20.4.1.500 NMAC
9 (incorporating 40 CFR §264.72). As the canister is being lifted from the RH-TRU 72-B cask into
10 the Facility Cask, additional swipe samples may be taken.

11 Transfer of the Canister to the Underground

12 When the canister is fully within the Facility Cask, the lower shield valve is closed. The 6.25
13 Ton Grapple Hoist detaches from the canister and is raised until the 6.25 Ton Grapple Hoist
14 clears the Facility Cask, at which time the upper shield valve is closed. The 6.25 Ton Grapple
15 Hoist and shield bell are then raised clear of the Facility Cask, and the telescoping port shield is
16 retracted. The Facility Cask Rotating Device rotates the Facility Cask until it is in the horizontal
17 position on the Facility Cask Transfer Car. The shield doors on the Facility Cask Loading Room
18 are opened, and the facility Cask Transfer Car moves onto the waste shaft conveyance and is
19 lowered to the waste Shaft Station underground. At the waste Shaft Station underground, the
20 Facility Cask Transfer Car moves the Facility Cask from the waste shaft conveyance. A forklift
21 is used to remove the Facility Cask from the Facility Cask Transfer Car and to transport the
22 Facility Cask to the Underground HWDU.

23 Returning the Empty Cask

24 The empty RH-TRU 72-B cask or Shielded Insert is returned to the RH Bay by reversing the
25 process. In the RH Bay, swipe samples are collected from inside the empty cask. If necessary,
26 the inside of the cask is decontaminated. The RH-TRU 72-B cask lids are replaced, and the cask
27 is replaced on the trailer using the RH Bay Bridge Crane. The impact limiters are replaced, and
28 the trailer and the RH-TRU 72-B cask are then moved out of the RH Bay. The Shielded Insert is
29 stored in the RH Bay until needed.

30 M1-1e Inspections

31 Inspection of containers and container storage area are required by 20.4.1.500 NMAC
32 (incorporating 40 CFR §264.174). These inspections are described in this section.

33 M1-1e(1) WHB Unit

34 The waste containers in storage will be inspected visually or by closed-circuit television camera
35 prior to each movement and, at a minimum, weekly, to ensure that the waste containers are in
36 good condition and that there are no signs that a release has occurred. Waste containers will be

1 visually inspected for physical damage (severe rusting, apparent structural defects, signs of
2 pressurization, etc.) and leakage. If a primary waste container is not in good condition, the
3 Permittees will overpack the container, repair/patch the container in accordance with 49 CFR
4 §173 and §178 (e.g., 49 CFR §173.28), or return the container to the generator. This visual
5 inspection of CH TRU mixed waste containers shall not include the center drums of 7-packs and
6 waste containers positioned such that visual observation is precluded due to the arrangement of
7 waste assemblies on the facility pallets. If waste handling operations should stop for any reason
8 with containers located at the TRUDOCK while still in the Contact-Handled Package, primary
9 waste container inspections will not be accomplished until the containers of waste are removed
10 from the Contact-Handled Package. If the lid to the Contact-Handled Package inner container
11 vessel is removed, radiological checks (swipes of Contact-Handled Package inner surfaces) will
12 be used to determine if there is contamination within the Contact-Handled Package. Such
13 contamination could indicate a waste container leak or spill. Using radiological surveys, a
14 detected spill or leak of a radioactive contamination from a waste container will also be assumed
15 to be a hazardous waste spill or release.

16 Waste containers residing within a Contact-Handled Package are not inspected, as described in
17 the first bullet in Section M1-1e(2).

18 Waste containers will be inspected prior to reentering the waste management process line for
19 downloading to the underground. Waste containers stored in this area will be inspected at least
20 once weekly.

21 Loaded RH-TRU 72-B and CNS 10-160B casks will be inspected when present in the RH Bay.
22 Physical or closed-circuit television camera inspections of the RH Complex are conducted as
23 described in Table D-1a. Canisters loaded in an RH-TRU 72-B cask are inspected in the Transfer
24 Cell during transfer from the cask to the Facility Cask. Waste containers received in CNS 10-
25 160B casks are inspected in the Hot Cell during transfer from the cask to the Facility Canister by
26 camera and/or visual inspection (through shield windows).

27 M1-1e(2) Parking Area Unit

28 Inspections will be conducted in the Parking Area Unit at a frequency not less than once weekly
29 when waste is present. These inspections are applicable to loaded, stored Contact-Handled and
30 Remote-Handled Packages. The perimeter fence located at the lateral limit of the Parking Area
31 Unit, coupled with personnel access restrictions into the WHB, will provide the needed security.
32 The perimeter fence and the southern border of the WHB shall mark the lateral limit of the
33 Parking Area Unit (Figure M1-2). Inspections of the Contact-Handled or Remote-Handled
34 Packages stored in the Parking Area Unit will focus on the inventory and integrity of the
35 shipping containers and the spacing between Contact-Handled and Remote-Handled Packages.
36 This spacing will be maintained at a minimum of four feet.

37 Contact-Handled and Remote-Handled Packages located in the Parking Area Unit will be
38 inspected weekly during use and prior to each reuse.

1 Inspection of waste containers is not possible when the containers are in their shipping container
2 (e.g., casks, TRUPACT-II or HalfPACTs). Inspections can be accomplished by bringing the
3 shipping containers into the WHB Unit and opening them and lifting the waste containers out for
4 inspection. The DOE, however, believes that removing containers strictly for the purposes of
5 inspection results in unnecessary worker exposures and subjects the waste to additional handling.
6 The DOE has proposed that waste containers need not be inspected at all until they are ready to
7 be removed from the shipping container for emplacement underground. Because shipping
8 containers are sealed and are of robust design, no harm can come to the waste while in the
9 shipping containers and the waste cannot leak or otherwise be released to the environment.
10 Contact-Handled or Remote-Handled Packages shall be opened every 60 days for the purposes
11 of venting, so that the longest waste would be uninspected would be for 60 days from the date
12 that the inner containment vessel of the Contact-Handled or Remote-Handled Package was
13 closed at the generator site. Venting the Contact-Handled or Remote-Handled Packages involves
14 removing the outer lid and installing a tool in the port of the inner lid.

15 The following strategy will be used for inspecting waste containers that will be retained within
16 their shipping containers for an extended period of time:

- 17 • If the reason for retaining the TRU mixed waste containers in the shipping container is
18 due to an unresolved manifest discrepancy, the DOE will return the shipment to the
19 generator prior to the expiration of the 60 day NRC venting period or within 30 days after
20 receipt at the WIPP, whichever comes sooner. In this case, no inspections of the internal
21 containers will be performed. The stored Contact-Handled or Remote-Handled Package
22 will be inspected weekly as described above.
- 23 • If the reason for retaining the TRU mixed waste containers in the Contact-Handled or
24 Remote-Handled Package is due to an equipment malfunction that prevents unloading the
25 waste in the WHB Unit, the DOE will return the shipment to the generator prior to the
26 expiration of the 60 day NRC venting period. In this case, the DOE would have to ship
27 the TRU mixed waste containers back with sufficient time for the generator to vent the
28 shipment within the 60 day limit. In this case, no inspections of the internal containers
29 will be performed. The stored Contact-Handled or Remote-Handled Package will be
30 inspected weekly as described above.
- 31 • If the reason for retaining the TRU mixed waste containers is due to an equipment
32 malfunction that prevents the timely movement of the waste containers into the
33 underground, the waste containers will be kept in the Contact-Handled or Remote-
34 Handled Package until day 30 (after receipt at the WIPP) or the expiration of the 60 day
35 limit, whichever comes sooner. At that time the Contact-Handled or Remote-Handled
36 Package will be moved into the WHB. Contact-Handled TRU mixed waste containers
37 will be removed and placed in one of the permitted storage areas in the WHB Unit. The
38 Remote-Handled Package will be vented, however, the containers will not be removed
39 from the shipping package. If there is no additional space within the permitted storage
40 areas of the WHB Unit, the DOE will discuss an emergency permit with the NMED for

1 the purposes of storing the waste elsewhere in the WHB Unit. Waste containers will be
2 inspected when removed from the Contact-Handled Packaging and weekly while in
3 storage in the WHB Unit. Contact-Handled or Remote-Handled Packages will be
4 inspected weekly while they contain TRU mixed waste containers as discussed above.

5 The DOE believes that this strategy minimizes both the amount of shipping that is necessary and
6 the amount of waste handling, while maintaining a reasonable inspection schedule. The DOE
7 will stop shipments of waste for any equipment outage that will extend beyond three days.

8 M1-1f Containment

9 The WHB Unit has concrete floors, which are sealed with a coating that is designed to resist all
10 but the strongest oxidizing agents. Such oxidizing agents do not meet the TSDF-WAC and will
11 not be accepted in TRU mixed waste at the WIPP facility. Therefore, TRU mixed wastes pose no
12 compatibility problems with respect to the WHB Unit floor. The floor coating consists of
13 Carboline[®] 1340 clear primer-sealer on top of prepared concrete, Carboline[®] 191 primer epoxy,
14 and Carboline[®] 195 surface epoxy. The manufacturer's chemical resistance guide shows "Very
15 Good" for acids and "Excellent" for alkalies, solvents, salt, and water. Uses are indicated for
16 nuclear power plants, industrial equipment and components, chemical processing plants, and
17 pulp and paper mills for protection of structural steel and concrete. During the Disposal Phase,
18 should the floors need to be re-coated, any floor coating used in the WHB Unit TRU mixed
19 waste handling areas will be compatible with the TRU mixed waste constituents and will have
20 chemical resistance at least equivalent to the Carboline[®] products. Figure M1-1 shows where
21 TRU mixed waste handling activities discussed in this section occur.

22 During normal operations, the floor of the storage areas within the WHB Unit shall be visually
23 inspected on a weekly basis to verify that it is in good condition and free of obvious cracks and
24 gaps. Floor areas of the WHB Unit in use during off-normal events will be inspected prior to use
25 and weekly thereafter. All TRU mixed waste containers located in the permitted storage areas
26 shall be elevated at least 6 in. (15 cm) from the surface of the floor. TRU mixed waste containers
27 that have been removed from Contact-Handled or Remote-Handled Packaging shall be stored at
28 a designated storage area inside the WHB Unit so as to preclude exposure to the elements.

29 Secondary containment at the CH Bay Storage Area inside the WHB Unit shall be provided by
30 the WHB Unit floor (See Figure M1-1). The WHB Unit is engineered such that during normal
31 operations, the floor capacity is sufficient to contain liquids upon release. Secondary
32 Containment at the Derived Waste Storage Area of the WHB Unit will be provided by a
33 polyethylene standard drum pallet. The Parking Area Unit and TRUDOCK Storage Area of the
34 WHB Unit require no engineered secondary containment since no waste is to be stored there
35 unless it is protected by the Contact-Handled or Remote-Handled Packaging.

36 Calculations to determine the floor surface area required to provide secondary containment in the
37 event of a release are based on the maximum quantity of liquid which could be present within ten
38 percent of one percent of the volume of all the containers or one percent of the capacity of the
39 largest single container, whichever is greater.

1 Secondary containment at storage locations inside the RH Bay and Cask Unloading Room is
2 provided by the cask. Secondary containment at storage locations inside the Transfer Cell is
3 provided by the RH-TRU 72-B cask or Shielded Insert. Secondary containment at storage
4 locations in the Facility Cask Loading Room is provided by the Facility Cask. In the Hot Cell,
5 waste containers are stored in either the drum carriage unit or in canister sleeves. The Lower Hot
6 Cell provides secondary containment as described in section M1-f(2). In addition, the RH Bay,
7 Hot Cell, and Transfer Cell contain 220-gallon (833-L) (Hot Cell), 11,400-gallon (43,152-L)
8 (RH Bay), and 220-gallon (833-L) (Transfer Cell) sumps, respectively, to collect any liquids.

9 M1-1f(1) Secondary Containment Requirements for the WHB Unit

10 The maximum volume of TRU mixed waste on facility pallets that will be stored in the CH Bay
11 Storage and Surge Storage Areas of the WHB is 18 facility pallets @ 2 TDOPs per pallet = 36
12 TDOPs of waste. 36 TDOPs @ 1,200 gal (4,540 L) per TDOP = 43,200 gal (163,440L) waste
13 container capacity. 43,200 gal (163,440 L) x ten percent of the total volume = 4,320 gal
14 (16,344 L) of waste. Since 4,320 gal (16,344 L) is greater than 1,200 gal (4,540 L), the
15 configuration of possible TDOPs in the storage area is used for the calculation of secondary
16 containment requirements. 4,320 gal (16,344 L) of liquid x one percent liquids = 43.2 gal (163.4
17 L) of liquid for which secondary containment is needed.

18 The maximum volume of TRU mixed waste that will be stored in the Derived Waste Storage
19 Area of the WHB Unit is one SWB. 1 SWBs @ 496 gal (1,878 L) per SWB = 496 gal (1,878 L)
20 waste container capacity. Since the maximum storage volume of 496 gal (1,878 L) is equal to the
21 volume of the largest single container, the volume of the a single SWB is used for the calculation
22 of secondary containment requirements. 496 gal (1,878 L) of liquid x one percent liquids = 4.96
23 gal (18.8 L) of liquid for which secondary containment is needed.

24 The maximum volume of TRU mixed waste that will be stored in the Hot Cell is 13 RH TRU
25 drums @ 55 gal (210 L) per drum = 715 (2,730 L) of waste in drums. 715 gal (2,730 L) of waste
26 x ten percent of total volume = 71.5 gal (273 L) of waste. Secondary containment for liquids will
27 need to have a capacity of 71.5 gal (273 L). Since 71.5 gal (273 L) is less than the volume of the
28 single container of 235 gal (890 L) therefore, the larger volume is used for determining the
29 secondary containment requirements. 235 gal (890 L) of waste x one percent liquids = 2.35 gal
30 (8.9 L) of liquid needed for secondary containment.

31 The maximum volume of TRU mixed waste that will be stored in the Transfer Cell is one RH-
32 TRU 72-B Canister or one Facility Canister @ 235 gal (890 L) per canister x ten percent of total
33 volume = 23.5 gal (8.90 L) of waste. Since 23.5 gal (8.90 L) is less than the volume of the single
34 container of 235 gal (890 L) therefore, the larger volume is used for determining the secondary
35 containment requirements. 235 gal (890 L) of waste x one percent liquids = 2.35 gal (8.9 L) of
36 liquid needed for secondary containment.

1 M1-1f(2) Secondary Containment Description

2 The following is a calculation of the surface area the quantities of liquid would cover. Using a
3 conversion factor of 0.1337 ft³/gal (0.001 m³/L) and assuming the spill is 0.0033 ft (0.001 m)
4 thick, the following calculation can be used:

5 gallons × cubic feet per gallon ÷ thickness in feet = area covered in square feet

6 CH Bay Storage Area

7 43.2 gal × 0.1337 ft³/gal ÷ 0.0033 ft = 1,750 ft² (162.7 m²)

8 Hot Cell

9 2.35 gal × 0.1337 ft³/gal ÷ 0.0033 ft = 95 ft² (8.8 m²)

10 Transfer Cell

11 2.35 gal × 0.1337 ft³/gal ÷ 0.0033 ft = 95 ft² (8.8 m²)

12 The WHB Unit has 33,175 ft² (3,082 m²) of floor space, the CH Bay Storage Area has 26,151 ft²
13 (2,430 m²) of floor space. The CH Bay Storage Area requires 1,750 ft² (162.7 m²) for
14 containment, Thus, the floor area of the CH Bay Storage Area of the WHB Unit provide
15 sufficient secondary containment to contain a release of ten percent of one percent of the volume
16 of all of the containers, or one percent of the capacity of the largest container, whichever is
17 greater.

18 The Hot Cell and Transfer Cell are the only portions of the RH Complex managing RH TRU
19 mixed waste outside of casks or canisters. The Hot Cell has 1,841 ft² (171 m²) of floor space and
20 the Transfer Cell has 1,003 ft² (93 m²) of floor space. The Hot Cell and Transfer Cell require
21 only 95 ft² for containment, therefore there is sufficient floor space to contain a release of ten
22 percent of one percent of containers in these storage areas.

23 In addition, both the Hot Cell and the Transfer Cell each contain a 220 gal (833 L) sump that will
24 collect any liquids that spill from containers.

25 Derived Waste Storage Area

26 The derived waste containers in the Derived Waste Storage Area will be stored on standard drum
27 pallets, which provides approximately 50 gal (190 L) of secondary containment capacity. Thus
28 the secondary containment capacity of the standard drum pallet is sufficient to contain a release
29 of ten percent of one percent of the largest container (4.96 gal or 18.8 L).

1 Parking Area Unit

2 Containers of TRU mixed waste to be stored in the Parking Area Unit will be in Contact-
3 Handled or Remote-Handled Packages. There will be no additional requirements for engineered
4 secondary containment systems.

5 M1-1g Special Requirements for Ignitable, Reactive, and Incompatible Waste

6 Special requirements for ignitable, reactive, and incompatible waste are addressed in 20.4.1.500
7 NMAC (incorporating 40 CFR §§264.176 and 264.177). Permit Module II precludes ignitable,
8 reactive, or incompatible waste at the WIPP. No additional measures are required.

9 M1-1h Closure

10 Clean closure is planned in accordance with 20.4.1.500 NMAC (incorporating 40 CFR
11 §264.178) for all permitted container storage areas. The applicable areas and the plans for clean
12 closure are detailed in Permit Attachment I.

13 M1-1i Control of Run On

14 The WHB Unit is located indoors which prevents run-on from a precipitation event. In addition,
15 the CH TRU containers are stored on facility pallets, containment pallets, or standard drum
16 pallets, which elevate the CH TRU mixed waste containers at least 6 in. (15 cm) off the floor, or
17 in Contact-Handled or Remote-Handled Packages, so that any firewater released in the building
18 will not pool around containers. Within the RH Bay, Cask Unloading Room, Transfer Cell, and
19 Facility Cask Loading Room, waste containers are stored in casks or Shielded Inserts and
20 protected from any potential run on. Any firewater released in the building will not pool around
21 the waste containers as they are stored in casks, or Shielded Inserts. Within the Hot Cell, there is
22 no source of water during operations. However, control of run-on is provided by the Lower Hot
23 Cell, which lies below a sloped floor surrounded by a grating and canister sleeves in the Hot Cell
24 above.

25 In the Parking Area Unit, the containers of TRU mixed waste are always in Contact-Handled or
26 Remote-Handled Packages which protect them from precipitation and run on. Therefore, the
27 WIPP container storage units will comply with the requirements of 20.4.1.500 NMAC
28 (incorporating 40 CFR §264.175(b)(4)).

1

References

- 2 DOE, 1997a. Resource Conservation and Recovery Act Part B Permit Application, Waste
3 Isolation Pilot Plant (WIPP), Carlsbad, New Mexico, Rev. 6.5, 1997.
- 4 DOE, 1997b. Waste Isolation Pilot Plant Safety Analysis Report (DOE/WIPP-95-2065, Rev. 1),
5 U.S. Department of Energy, Carlsbad Area Office, Carlsbad, NM, April 1997.

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TABLES

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**TABLE M1-1
 BASIC DESIGN REQUIREMENTS, PRINCIPAL CODES, AND STANDARDS**

	Structure/Supports			Liquid and Process Air Handling Processing and storage equipment							Air Hdlg Ducting & Fans	HVAC filters			Mechanical Handling Equipment			Instrumentation and Electrical			Quality Assurance Program	
	DBE DBT ACI-318 AISC	ANSI A58.1	Site-specific Requirements	Vessel ASME VIII NFPA ^e	Piping & Valves		Pumps API-610 NFPA ^e	Storage Tanks API-650 or API-620	Heat Exchgrs ASME VIII TEMA	All Other Equipment Mfrs Std	ARI SMACNA AMCA	Pre-filters ASHRAE 52.68	HEPA Filters MIL F 51068C ANSI N 509 ANSI N 510	Crane and Related equipment CMAA	CMAA AISC AWS	All Other Equipment Mfrs STD	A-NE	ANSI Sods or Nat'l Electrical Code	IA/ Mfrs Std	ANSI/ASME NQA-1 and Supplements	Com. and Industry Practices	
					ANSI BBB,1 NFPA ^e	UP																
Design Class I	X		a	X			X	X	X		X	X	X	X	X		X	X		X		
Design Class Ii	a,b	X	a	X	X		X	X	X		X	X	X	X	X			X	X	X		
Design Class Iiia	a	X	a	a	X		a			X	X	X	X	a	a	X		X	X	X		
Design Class Iii		X	g		a	X				X	X	X	X			X		X	X		X	

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X = Minimum Requirements

^a Requirements to be determined on a case-by-case basis.

^b Required for structure and supports needed for confinement and control of radioactivity.

^c Except structures and supports that are designed to withstand a design-basis earthquake (DBE)/design-basis tornado (DBT) when specified in column 1 of this table.

^d Underwriter's Laboratory (UL) Class I Listed.

^e For fire-protection systems.

^f American Society for Mechanical Engineers (ASME) III for other Class I vessels.

^g Design of underground structures, mining equipment, and facilities are basically governed by the MSHA and experience in local mines.

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|---|---|--|
| ACI = American Concrete Institute | CMAA = Crane Manufacturers Association | MIL = Military (specification) |
| AISC = American Institute of Steel Construction | DBE = Design-basis earthquake | MSHA = Mine Safety and Health Administration |
| AMCA = Air Moving and Conditioning Association | DBT = Design-basis tornado | NFPA = National Fire Protection Association |
| ANSI = American National Standards Institute | HEPA = High-efficiency particulate air | NQA = Nuclear Quality Assurance (Standard) |
| API = American Petroleum Institute | HVAC = Heating, Ventilation, and Air-Conditioning | SMACNA = Sheet Metal and Air Conditioning Contractors National Association, Inc. |
| ARI = Air Conditioning and Refrigeration Institute | A = Institute of Electronics and Electronic Engineers | STD = Standard |
| ASHRAE = American Society of Heating, Refrigeration, and Air Conditioning Engineers, Inc. | IA = Instrument Society of America | TEMA = Tubular Exchanger Manufacturers Association |
| AWS = American Welding Society | MFR = Manufacturer | UP = Uniform Plumbing Code |

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**TABLE M1-2
 WASTE HANDLING EQUIPMENT CAPACITIES**

CAPACITIES FOR EQUIPMENT	
CH Bay overhead bridge crane	12,000 lbs.
CH Bay forklifts	26,000 lbs.
Facility Pallet	25,000 lbs.
Adjustable center-of-gravity lift fixture	10,000 lbs.
Facility Transfer Vehicle	30,000 lbs.
MAXIMUM GROSS WEIGHTS OF CONTAINERS	
Seven-pack of 55-gallon drums	7,000 lbs.
Four-pack of 85-gallon drums	4,500 lbs.
Three-pack of 100-gallon drums	3,000 lbs.
Ten-drum overpack	6,700 lbs.
Standard waste box	4,000 lbs.
MAXIMUM NET EMPTY WEIGHTS OF EQUIPMENT	
TRUPACT-II	13,140 lbs.
HalfPACT	10,500 lbs.
Adjustable center of gravity lift fixture	2,500 lbs.
Facility pallet	4,120 lbs.

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**TABLE M1-3
 RH TRU MIXED WASTE HANDLING EQUIPMENT CAPACITIES**

CAPACITIES FOR EQUIPMENT	
RH Bay Overhead Bridge Crane	140 tons main hoist 25 tons auxiliary hoist
RH-TRU 72-B Cask Transfer Car	20 tons
CNS 10-160B Cask Transfer Car	35 tons
Transfer Cell Shuttle Car	29 tons
Hot Cell Bridge Crane	15 tons
Overhead Powered Manipulator	2.5 tons
Facility Cask Rotating Device	No specific load rating
Cask Unloading Room Crane	25 tons
6.25 Ton Grapple Hoist	6.25 tons
Facility Cask Transfer Car	40 tons
MAXIMUM GROSS WEIGHTS OF RH TRU CONTAINERS	
RH TRU Canister	8,000 lbs
55-Gallon Drum	1,000 lbs
Facility Canister	10,000 lbs
MAXIMUM NET EMPTY WEIGHTS OF EQUIPMENT	
RH-TRU 72-B Cask	37,000 lbs
CNS 10-160B Cask	57,500 lbs
Facility Cask	67,700 lbs
Shielded Insert	26,300 lbs

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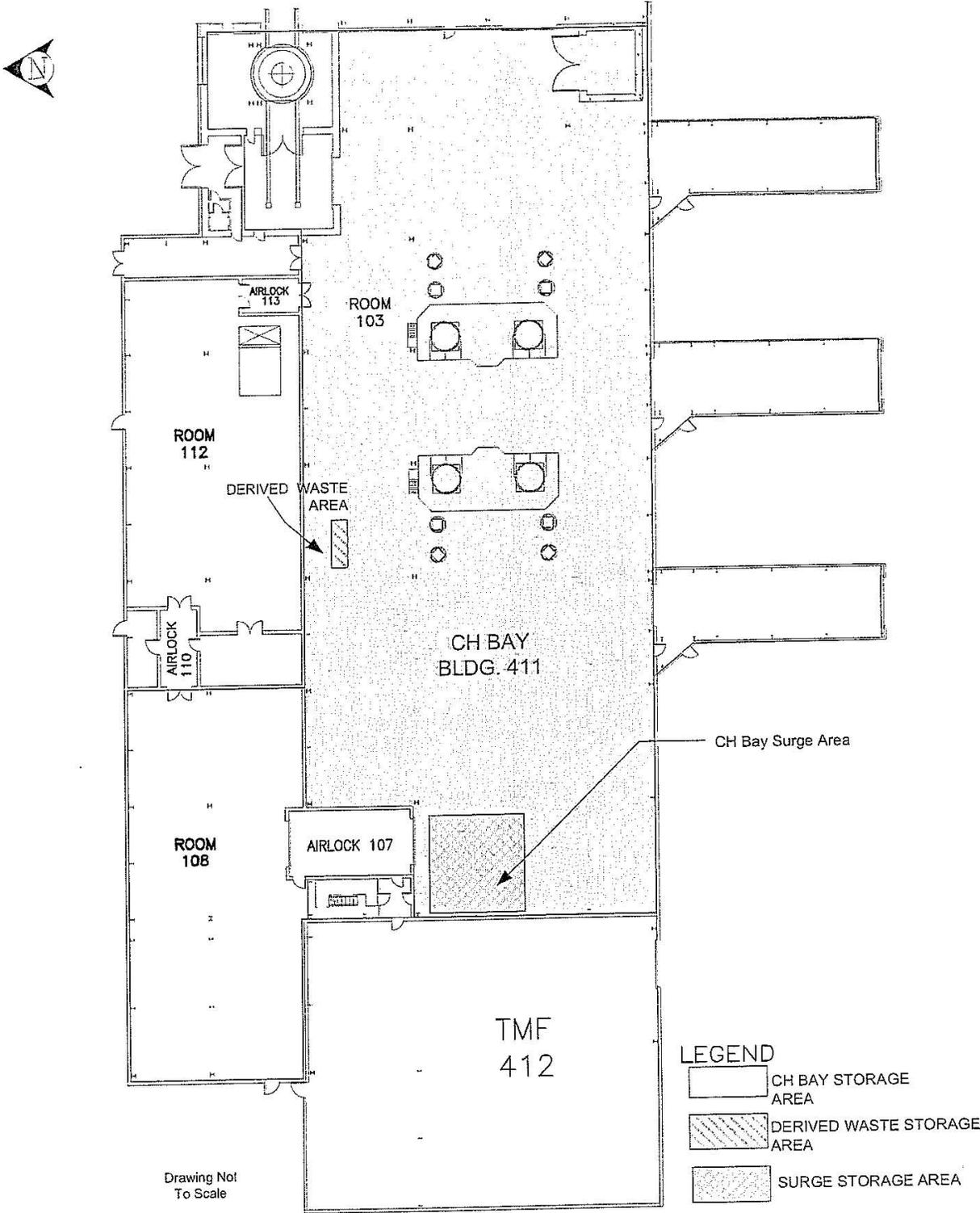
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FIGURES

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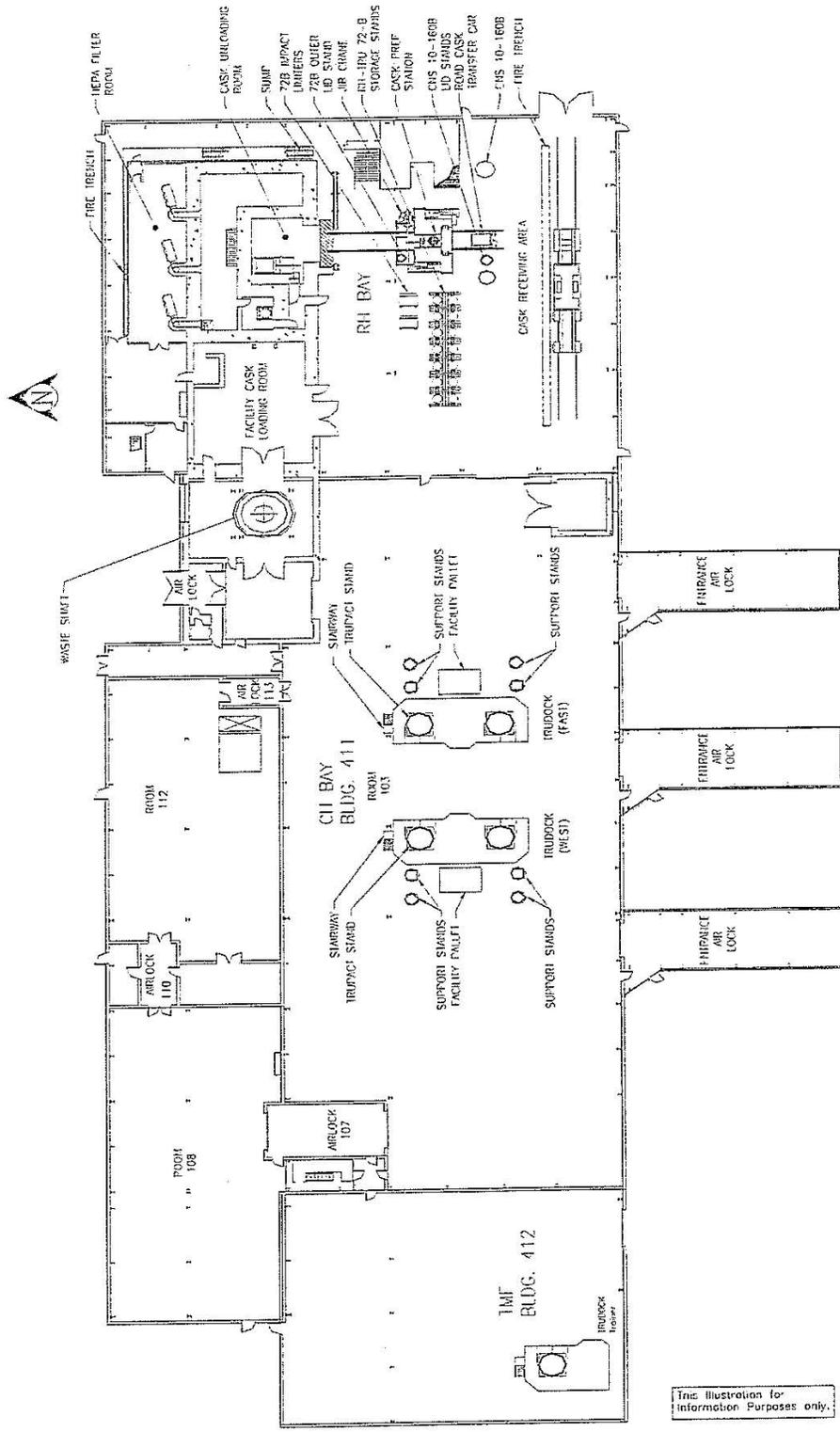


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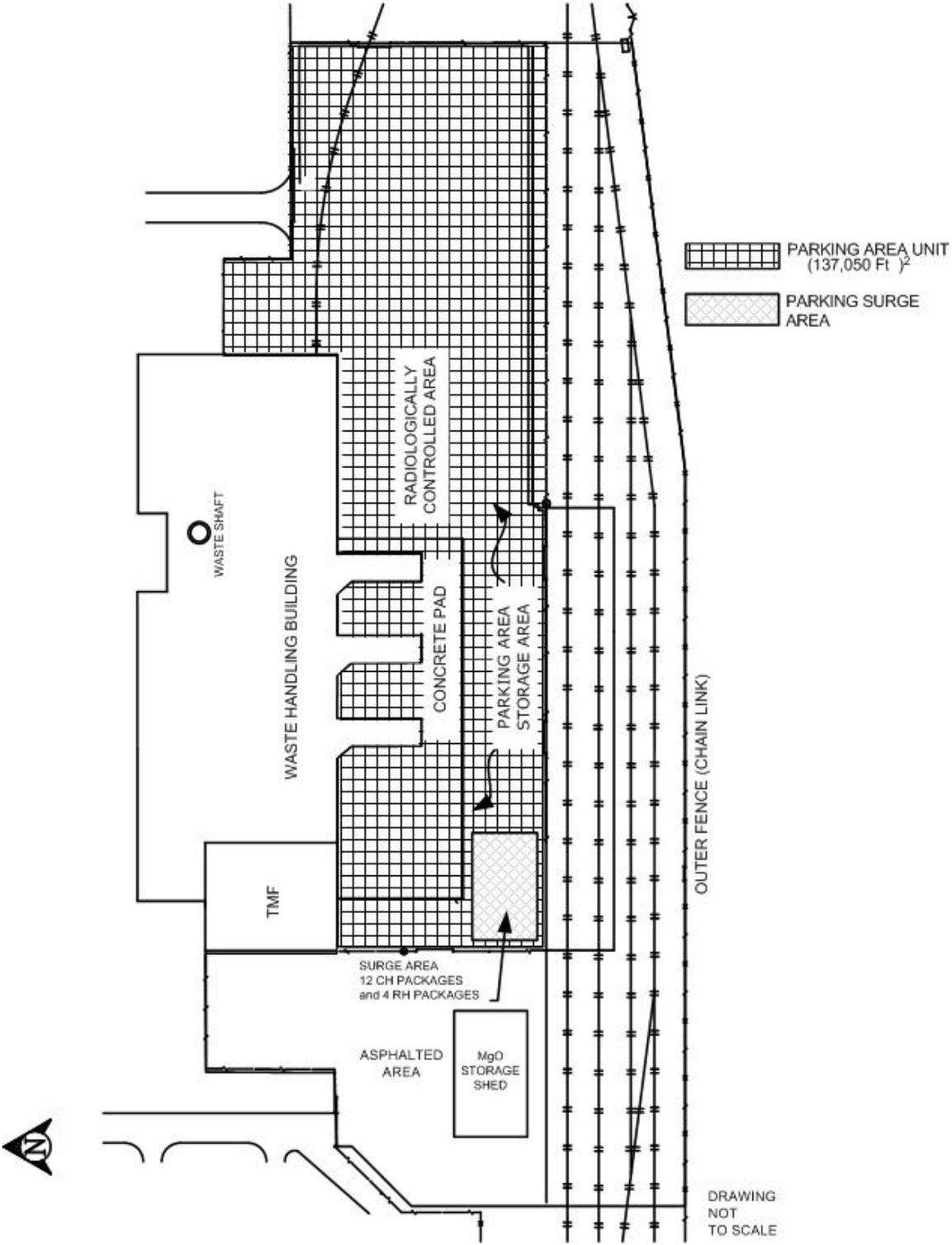
Figure M1-1
Waste Handling Building - CH TRU Mixed Waste Container Storage and Surge Areas



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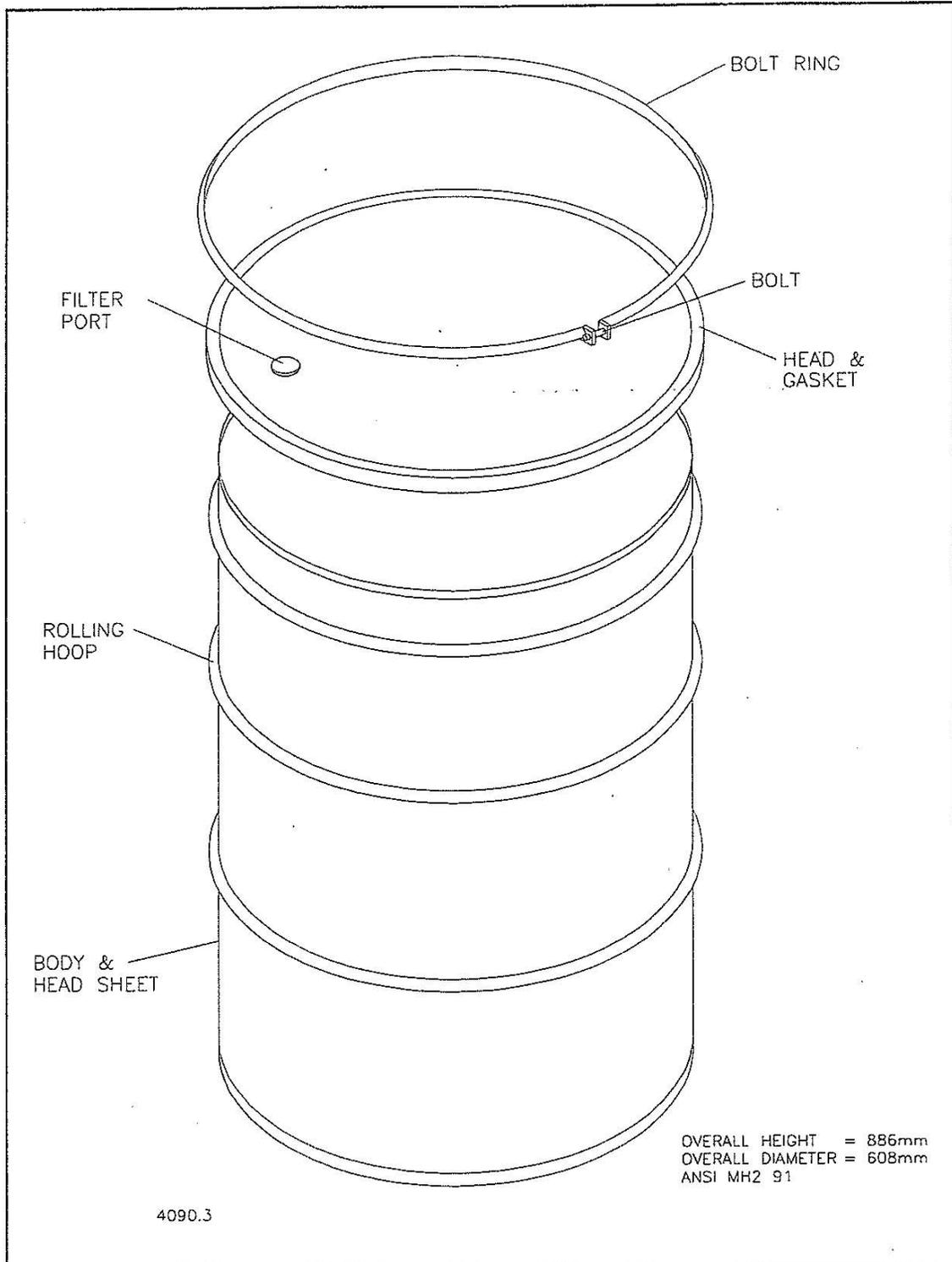
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Figure M1-1a
 Waste Handling Building Plan (Ground Floor)



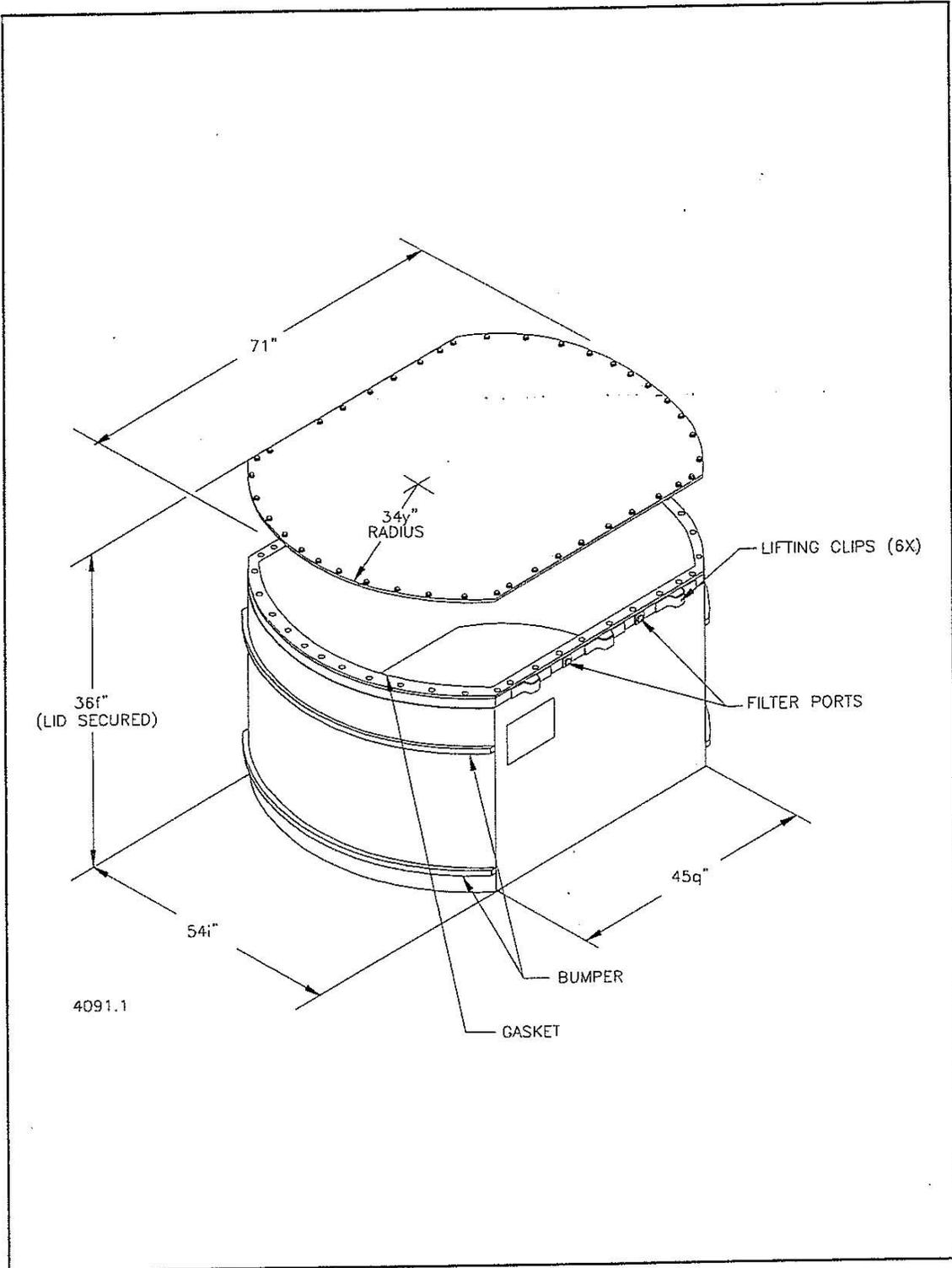
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Figure M1-2
Parking Area - Container Storage and Surge Areas



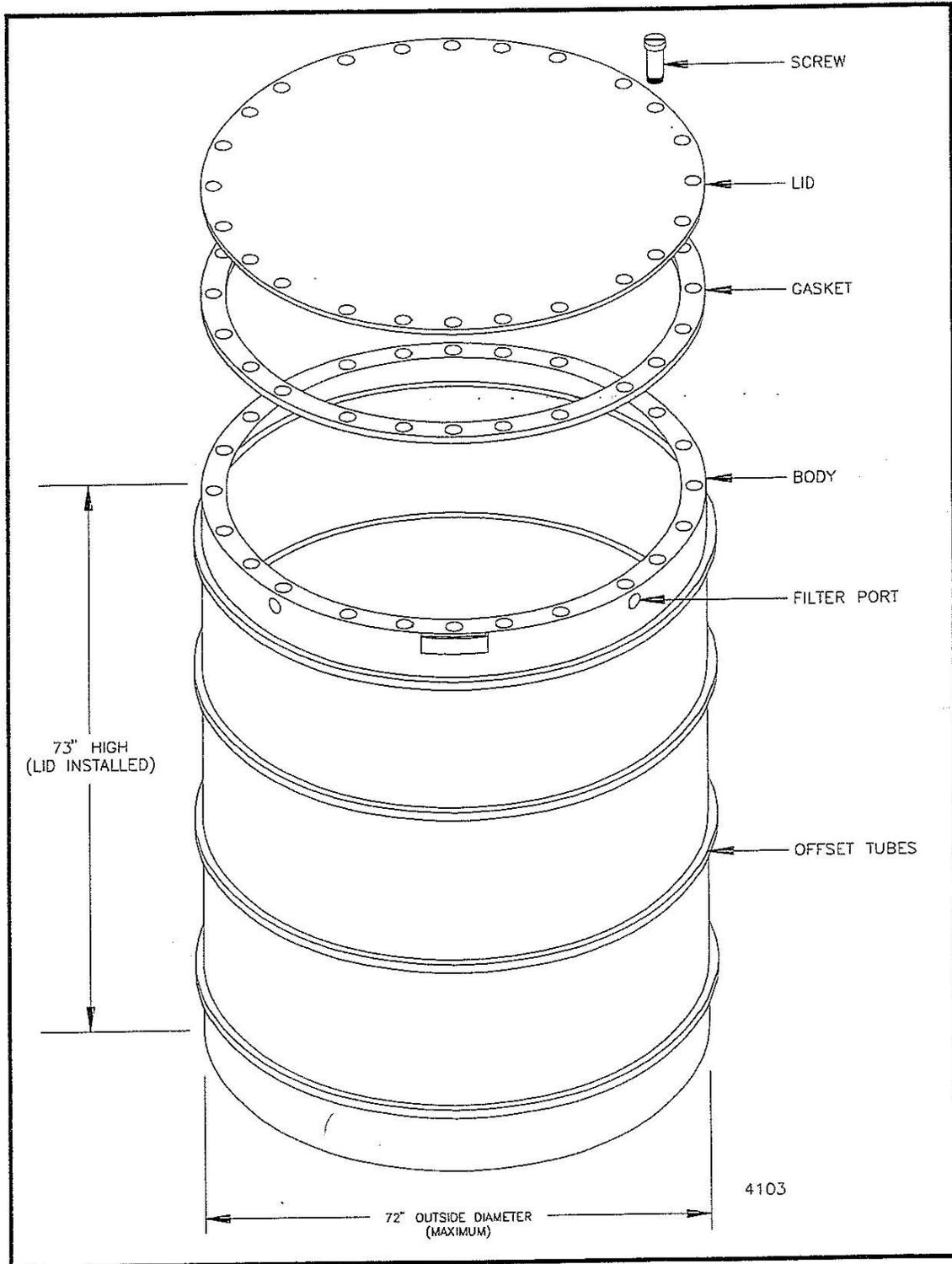
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Figure M1-3
Standard 55-Gallon Drum (Typical)



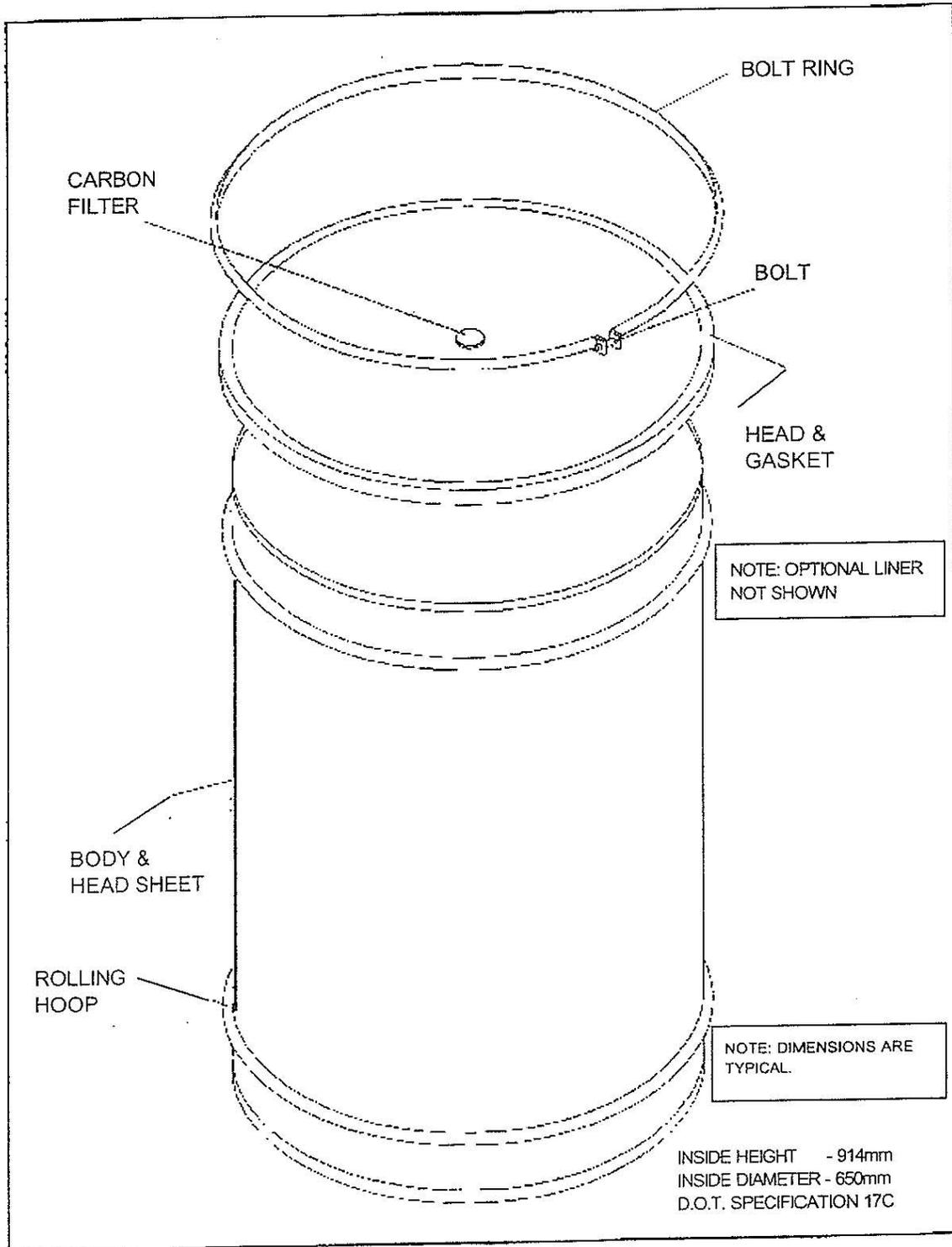
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Figure M1-4
Standard Waste Box



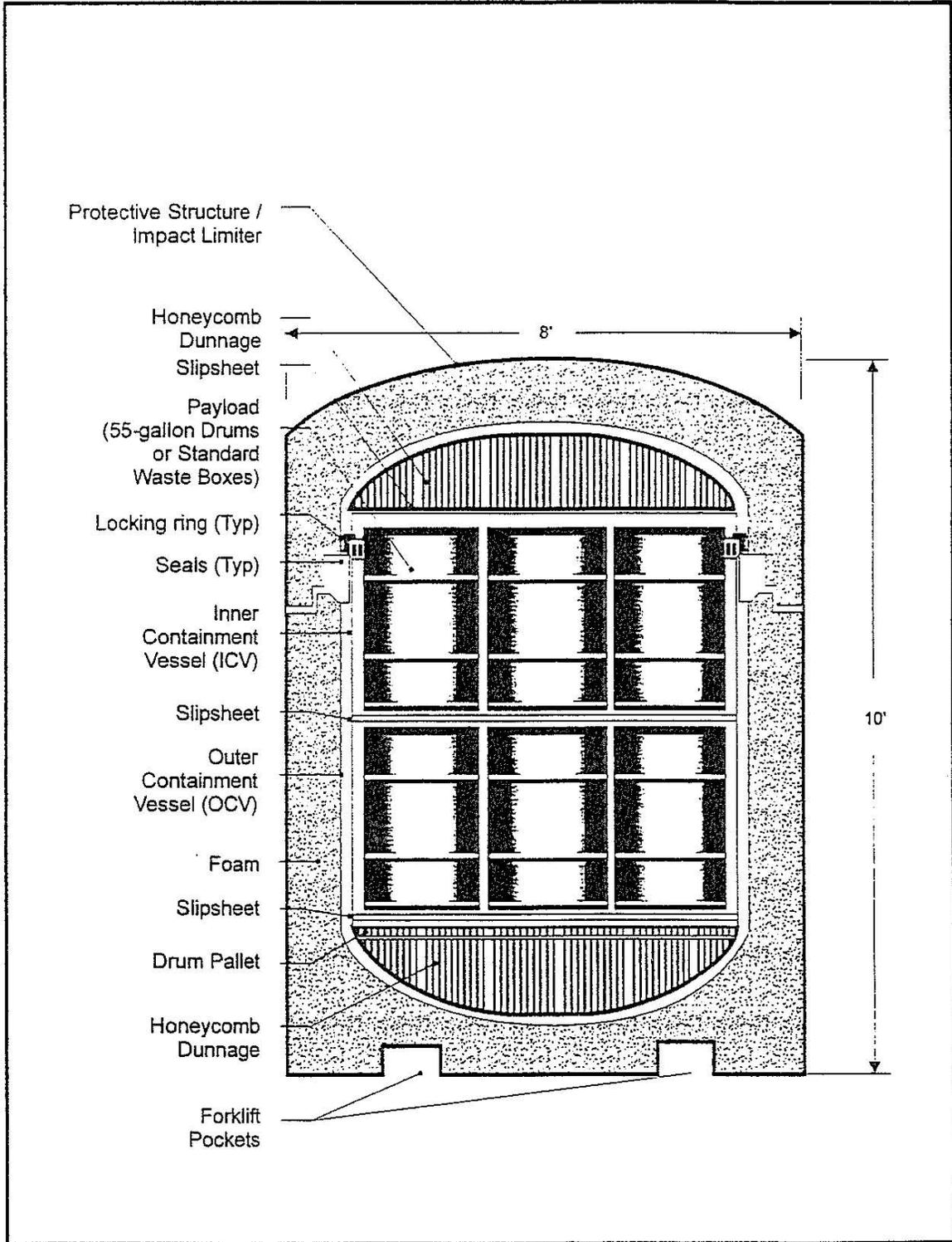
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Figure M1-5
Ten-Drum Overpack



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Figure M1-6
85-Gallon Drum

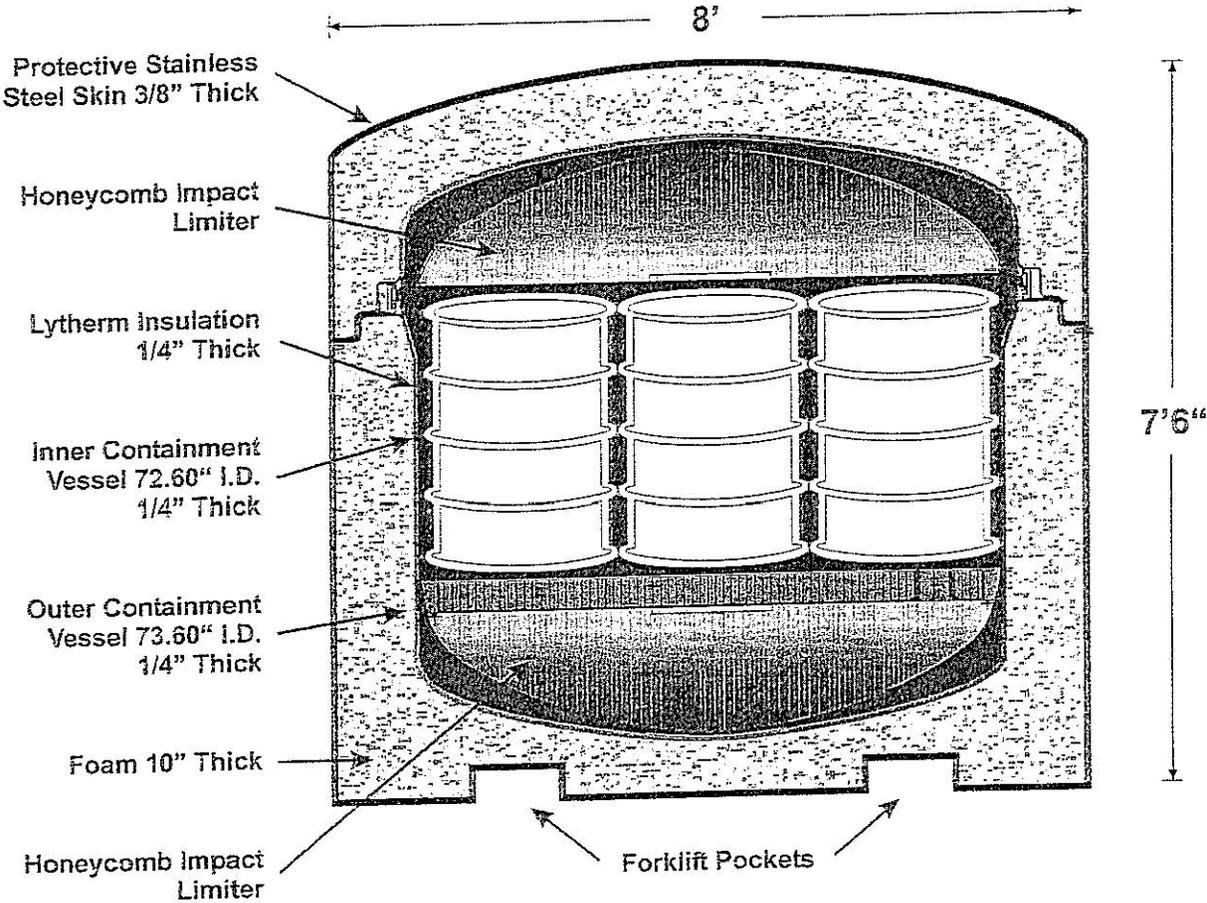


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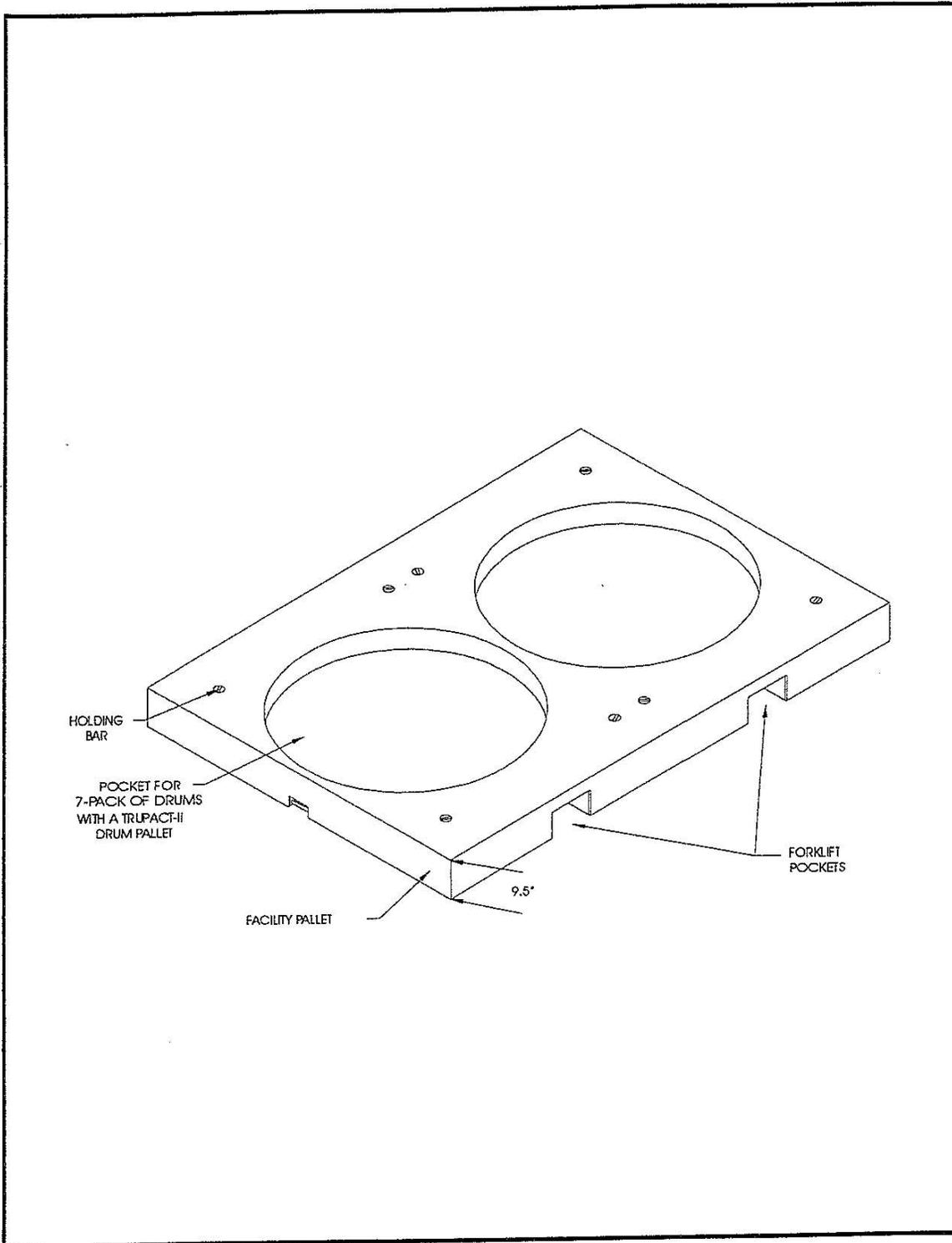
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Figure M1-8a
TRUPACT-II Shipping Container for CH Transuranic Mixed Waste (Schematic)



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Figure M1-8b
Typical HalfPACT Shipping Container for CH Transuranic Mixed Waste (Schematic)

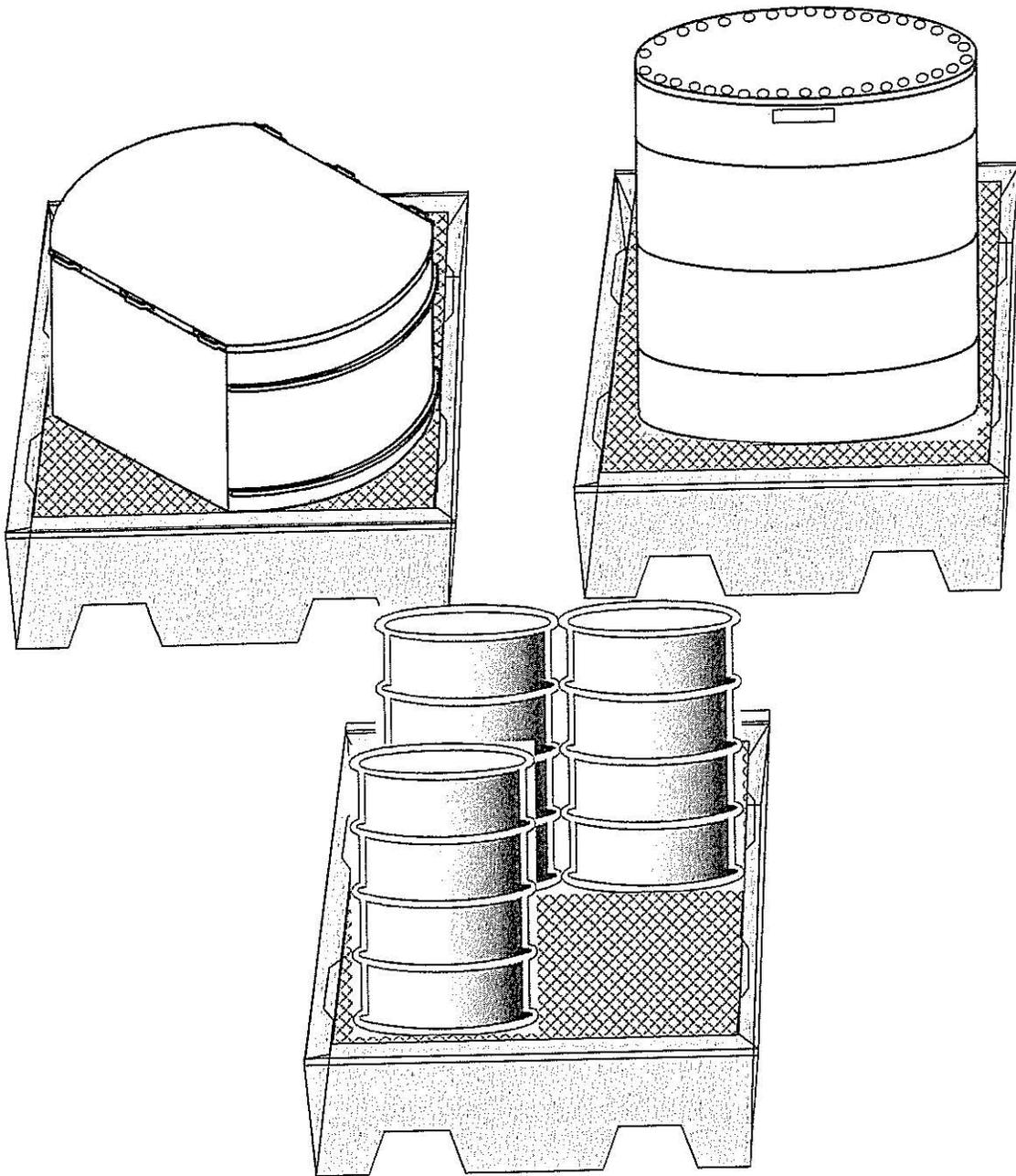


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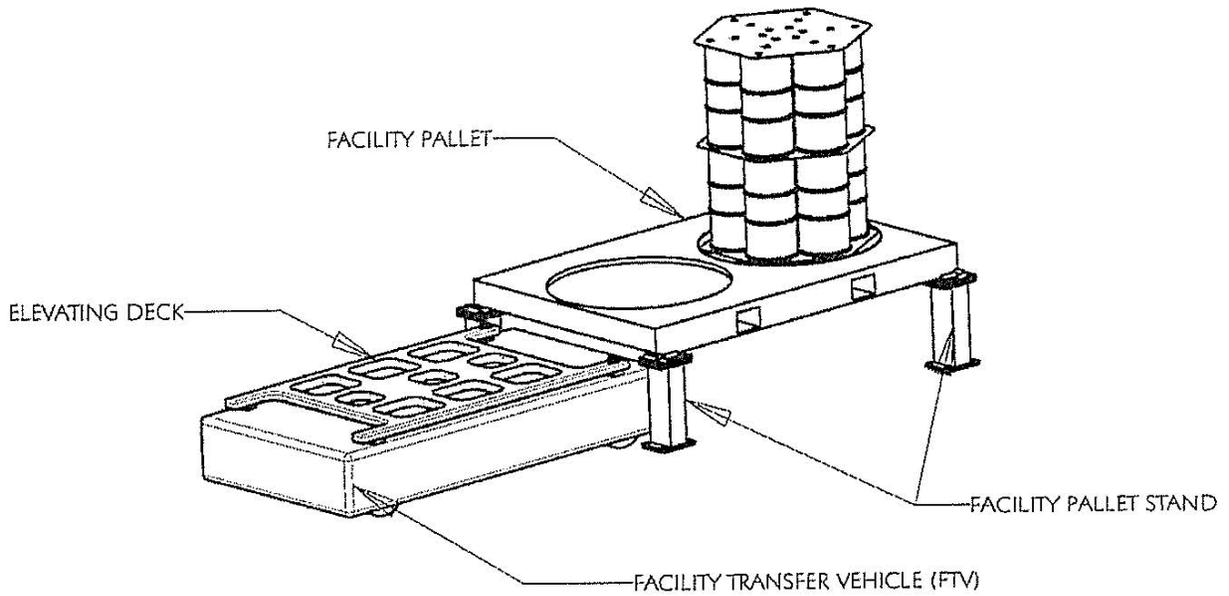
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Figure M1-10
Facility Pallet for Seven-Pack of Drums



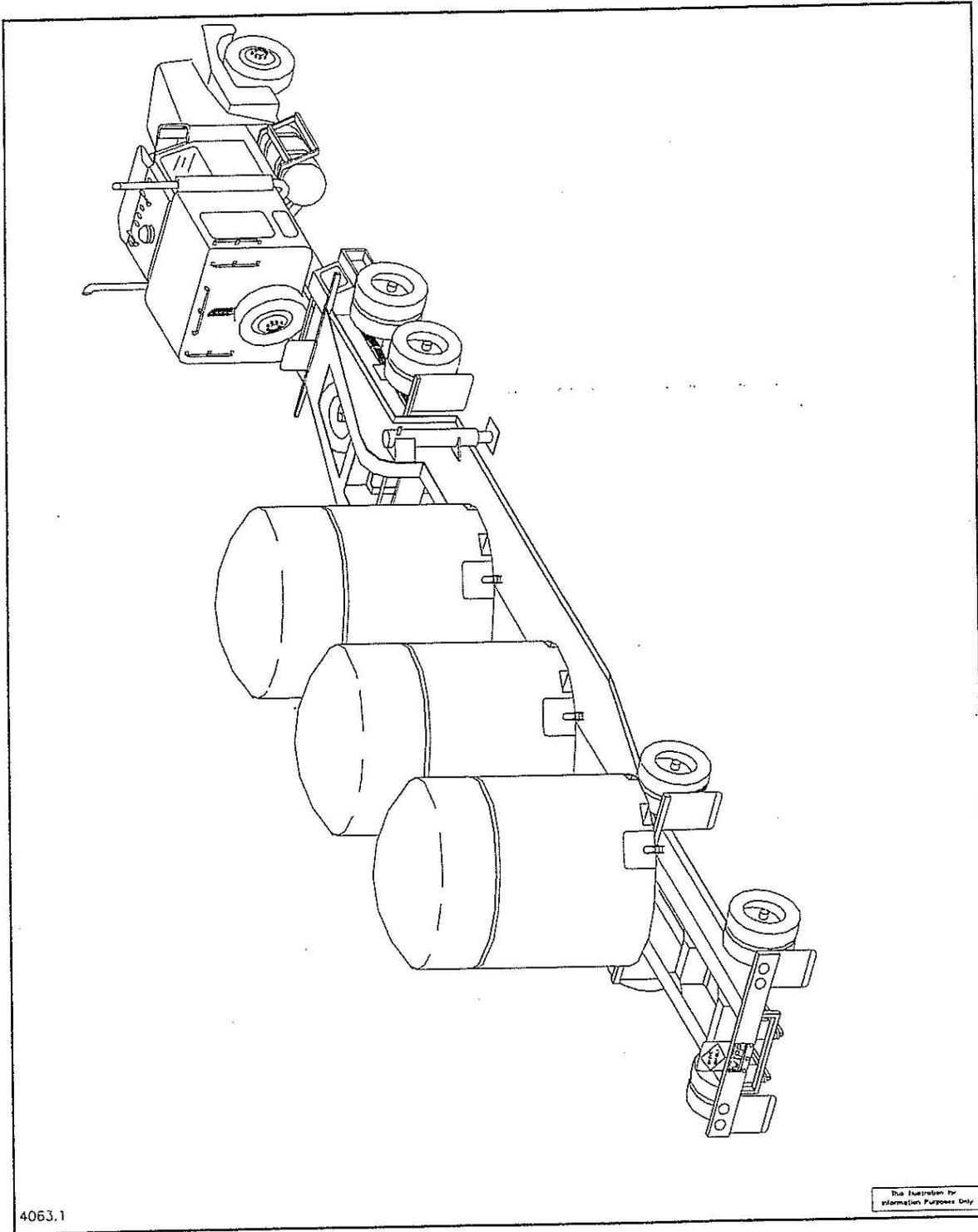
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Figure M1-10a
Typical Containment Pallet



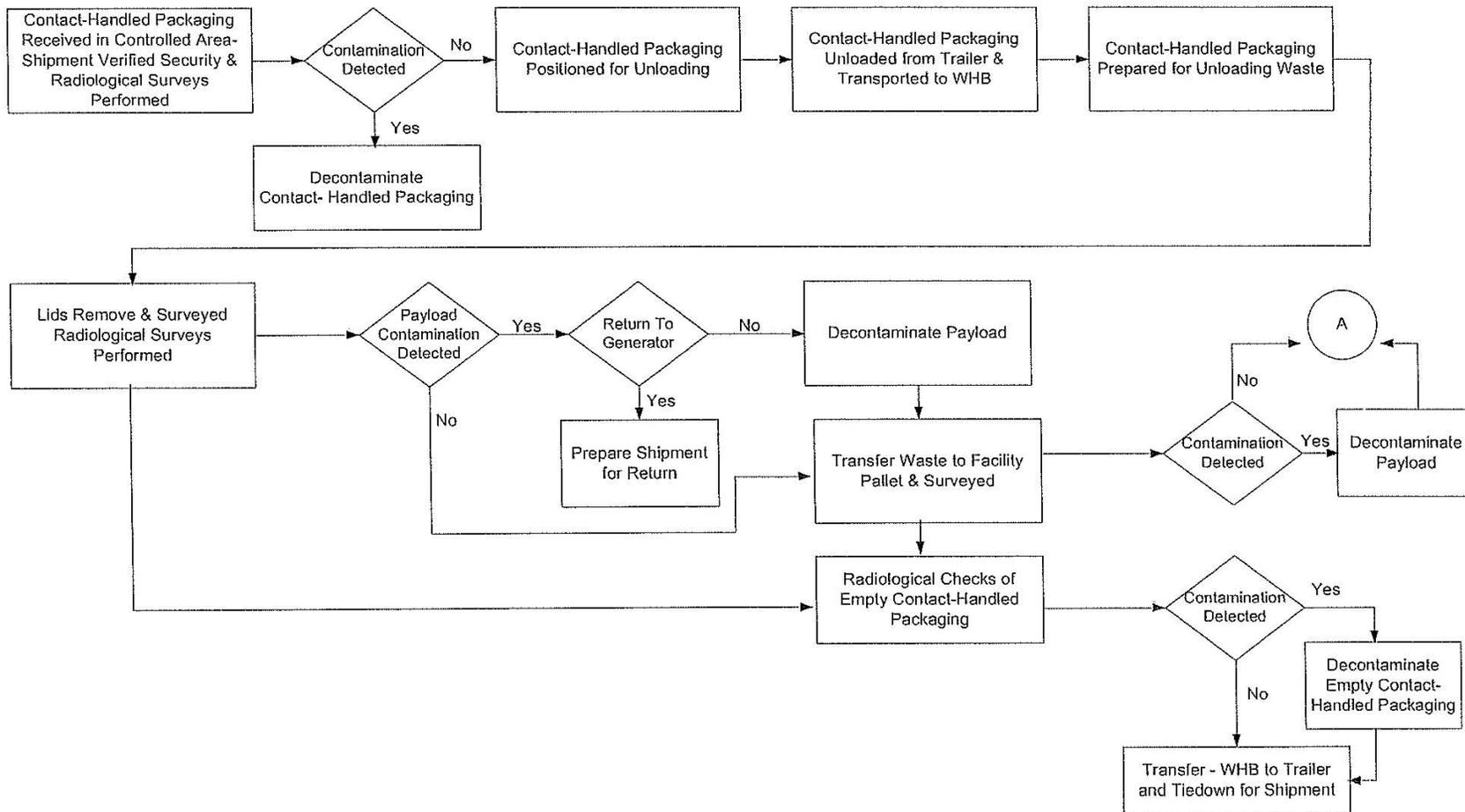
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Figure M1-11
Facility Transfer Vehicle, Facility Pallet, and Typical Pallet Stand



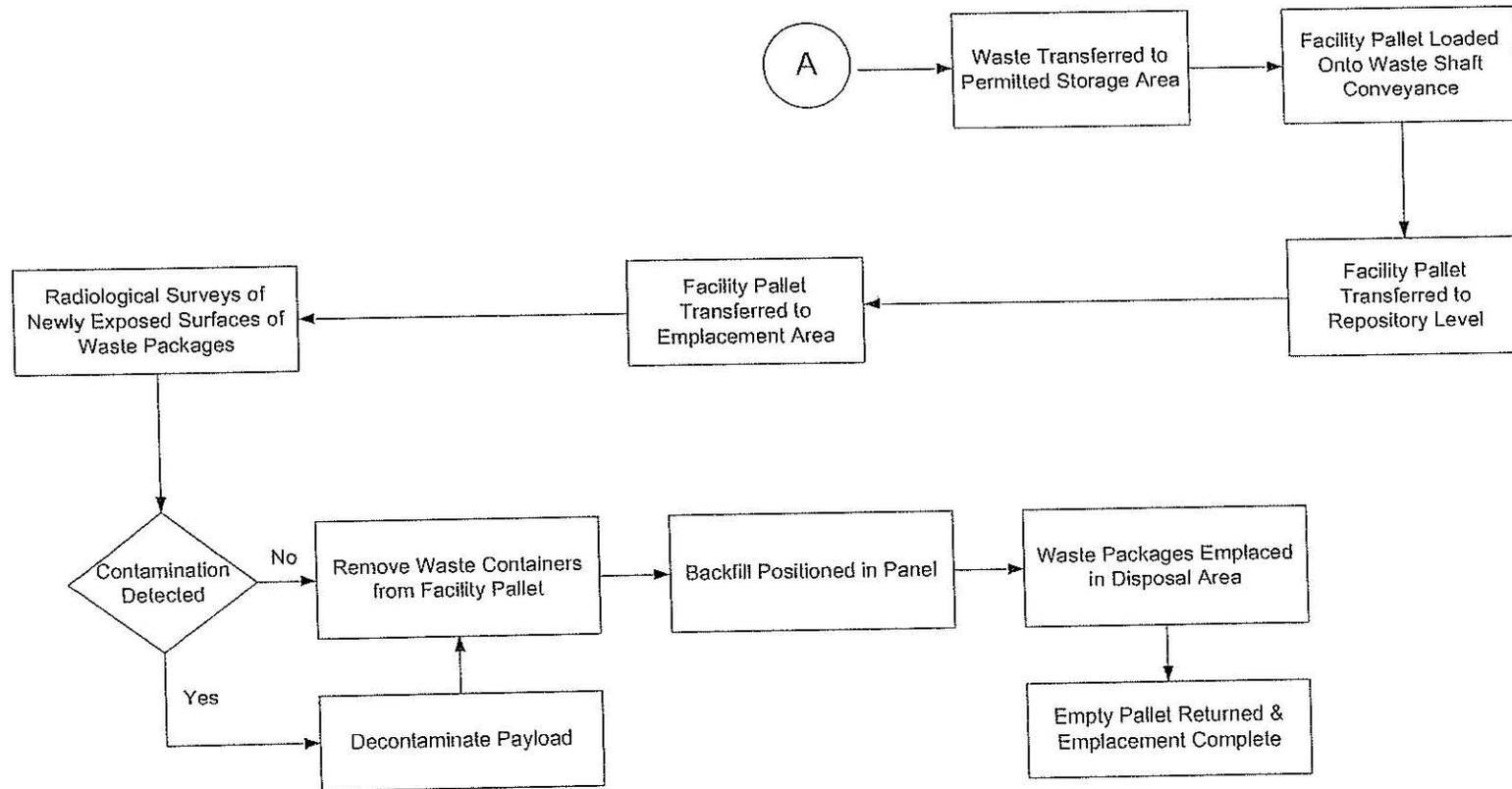
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Figure M1-12
TRUPACT-II Containers on Trailer



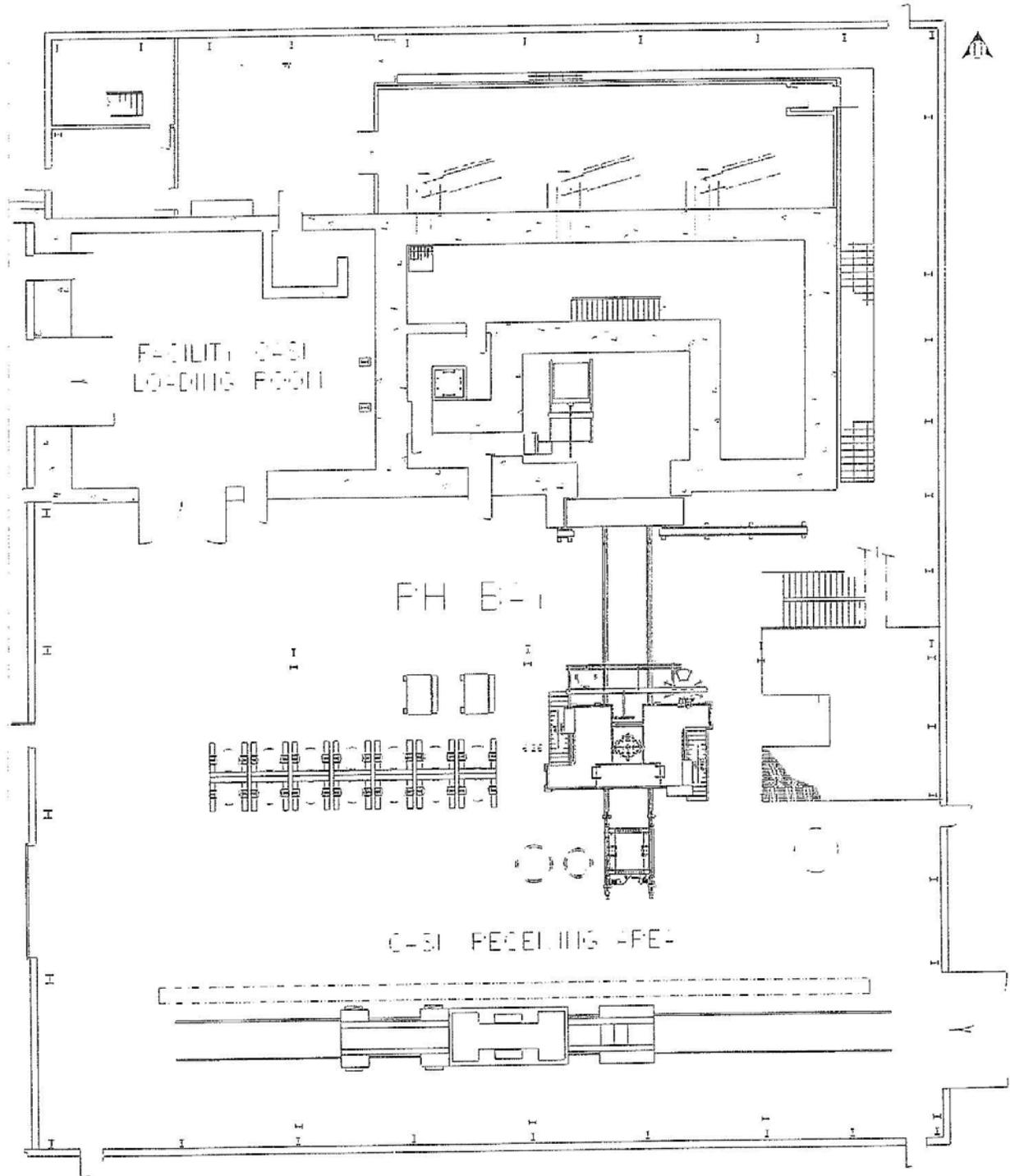
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Figure M1-13
 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram



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Figure M1-13
 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram (Continued)

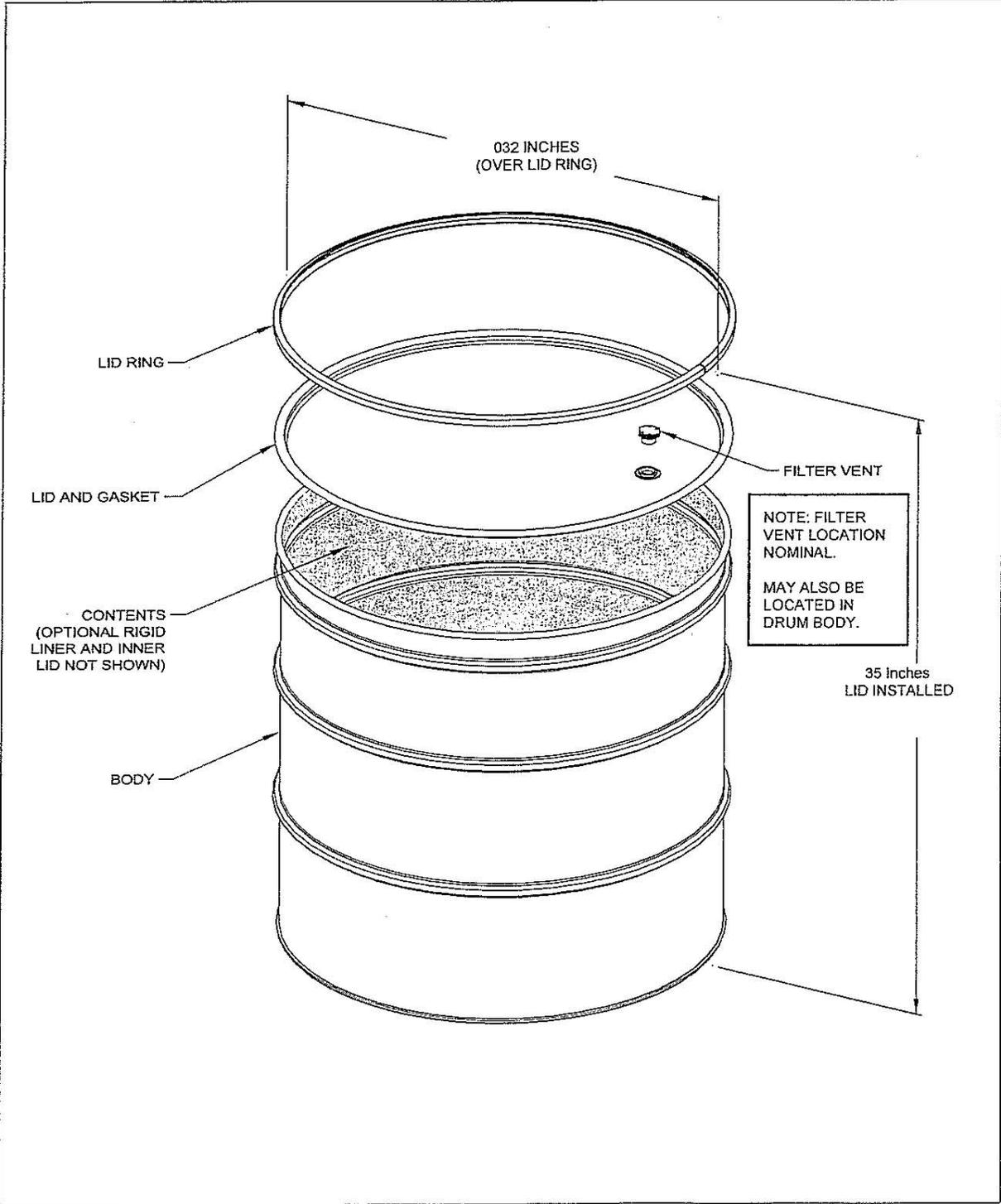


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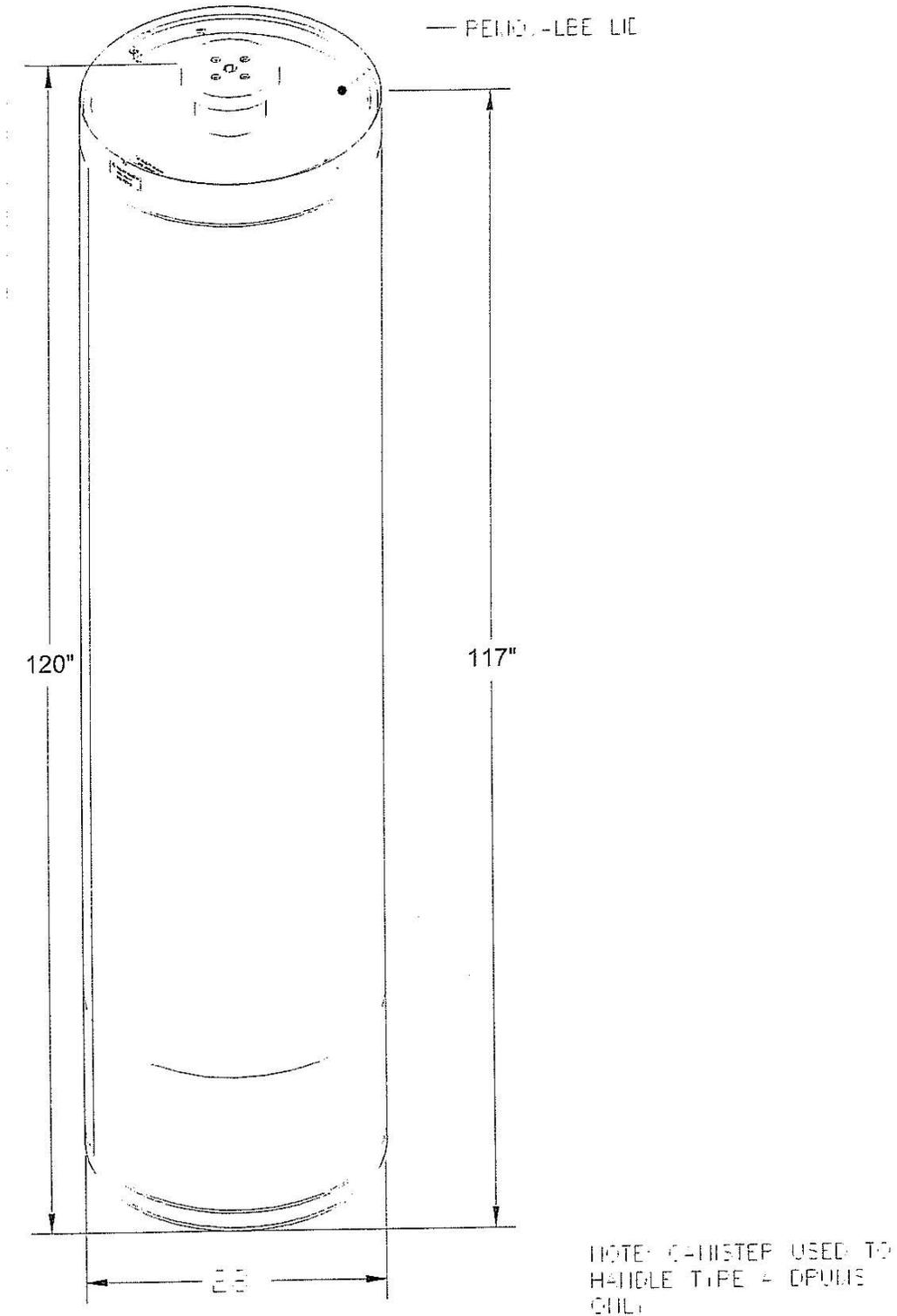
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Figure M1-14a
RH Bay Ground Floor



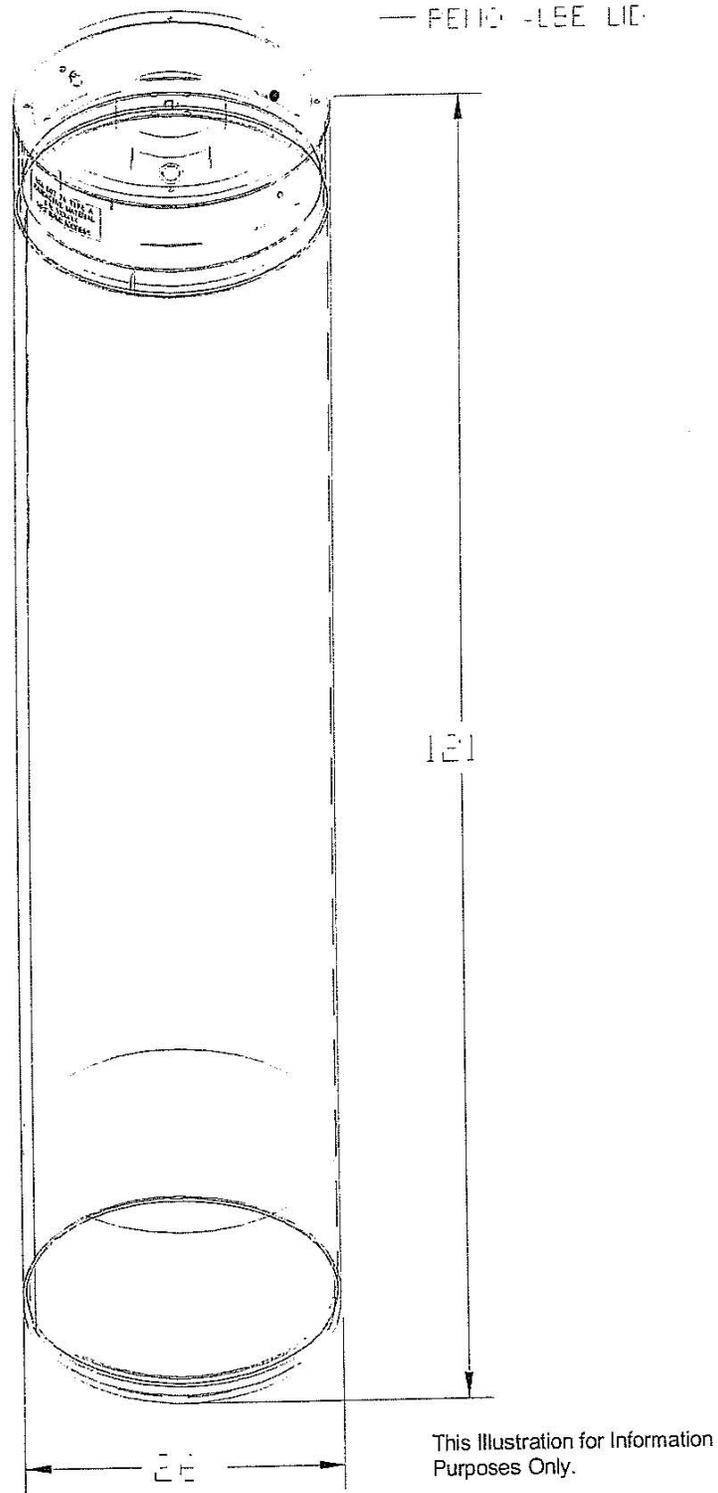
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Figure M1-15
100-Gallon Drum



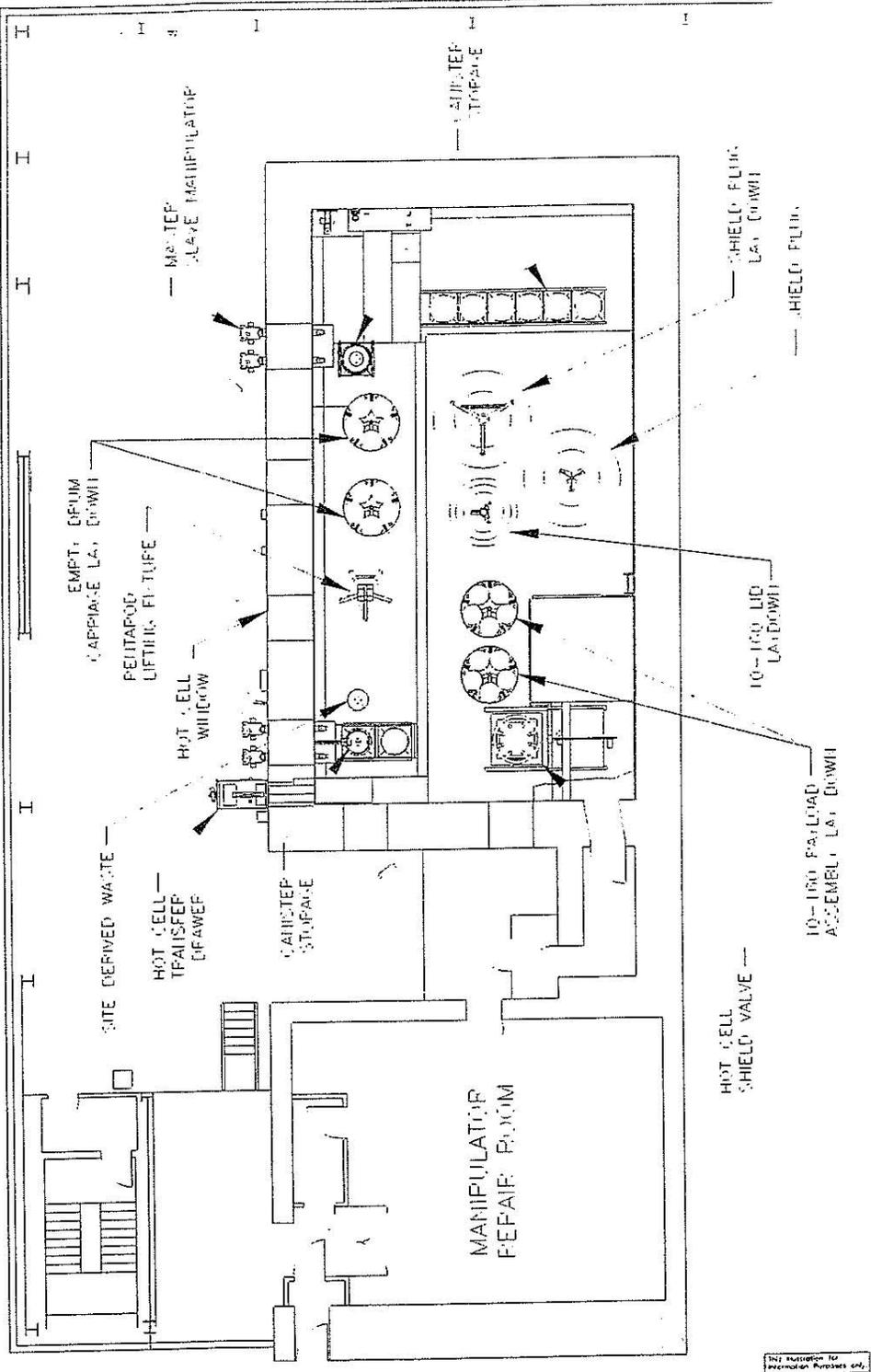
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Figure M1-16
Facility Canister Assembly



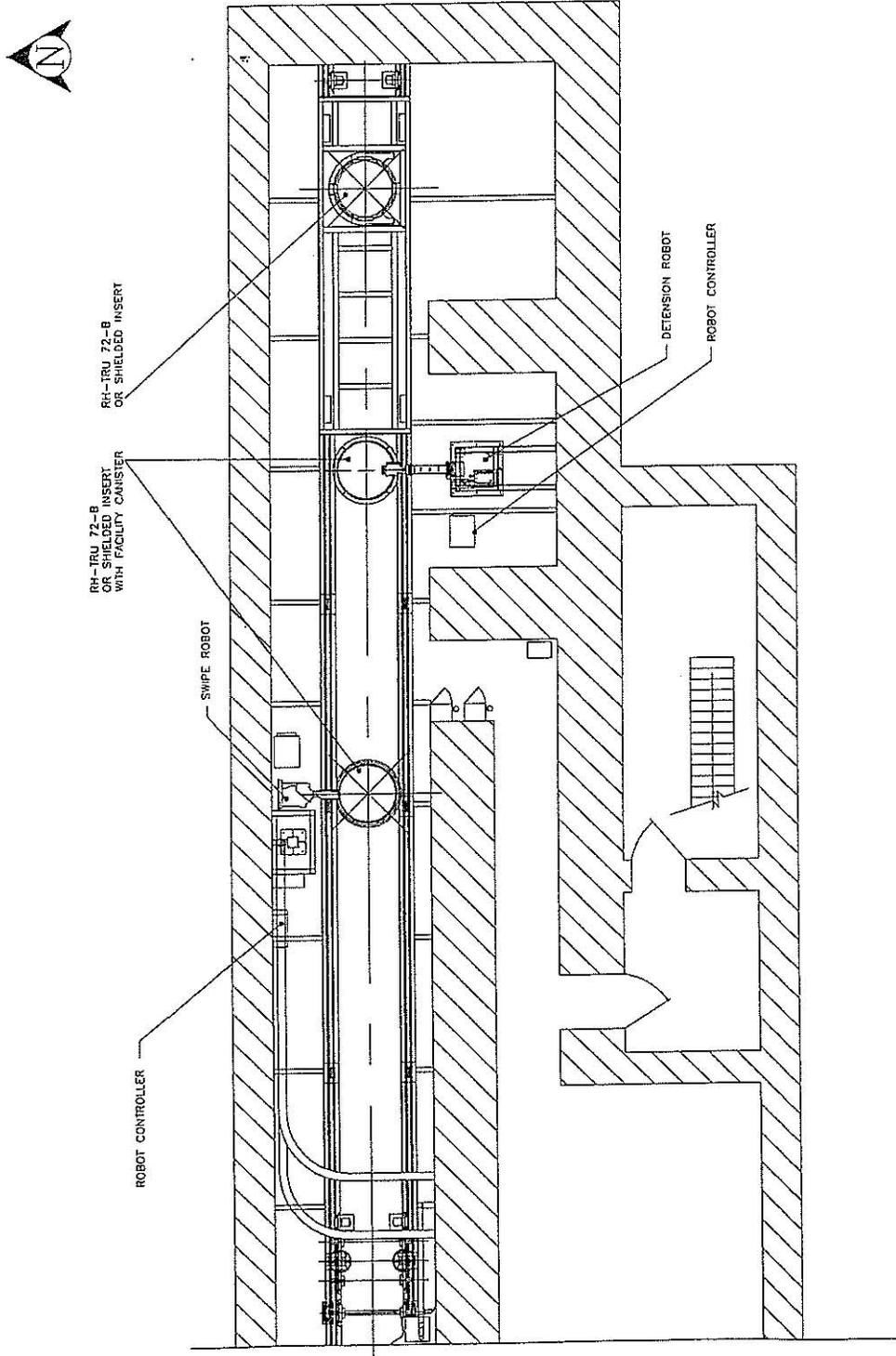
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Figure M1-16a
RH-TRU 72-B Canister Assembly



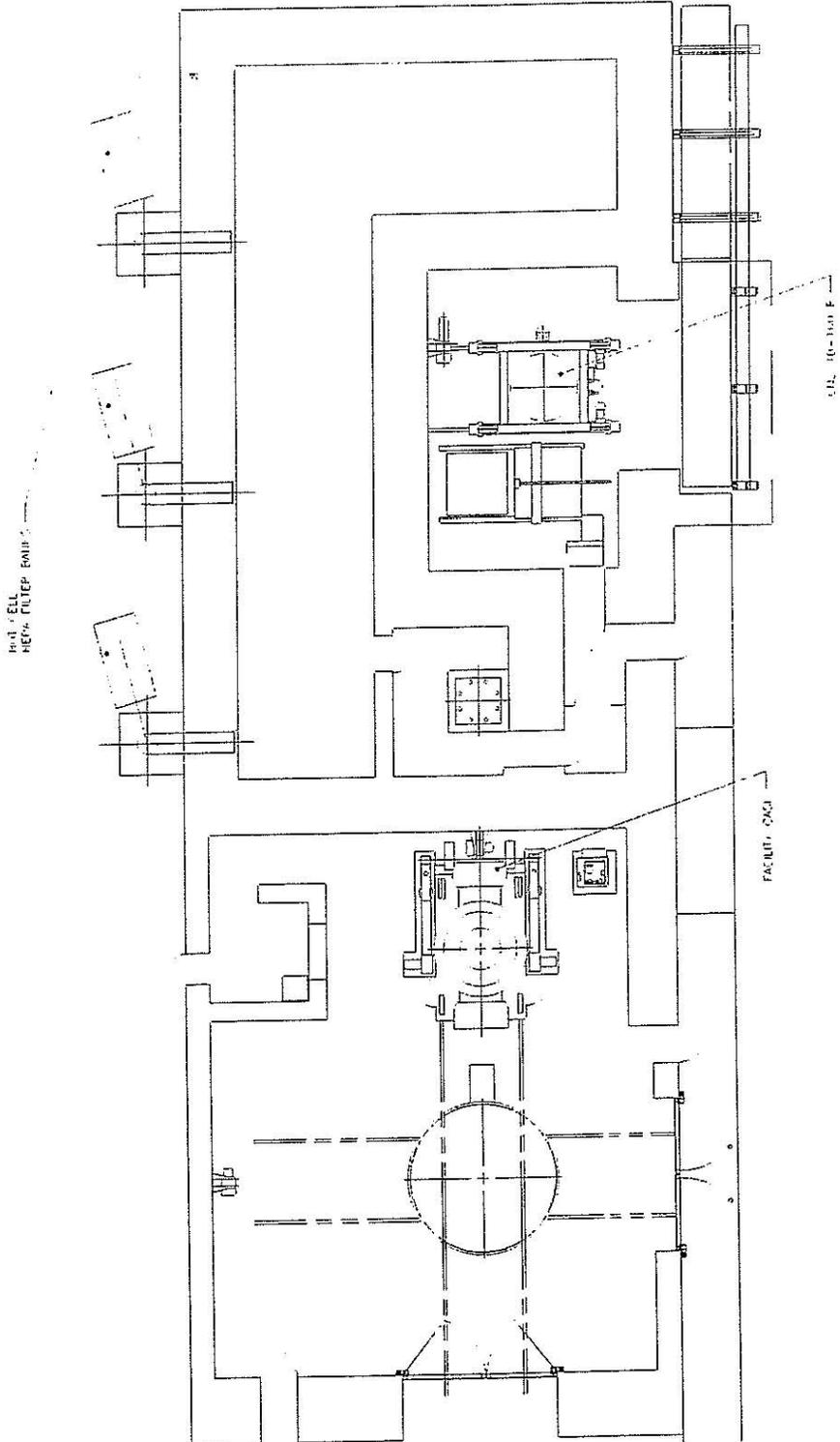
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Figure M1-17b
 RH Hot Cell Storage Area



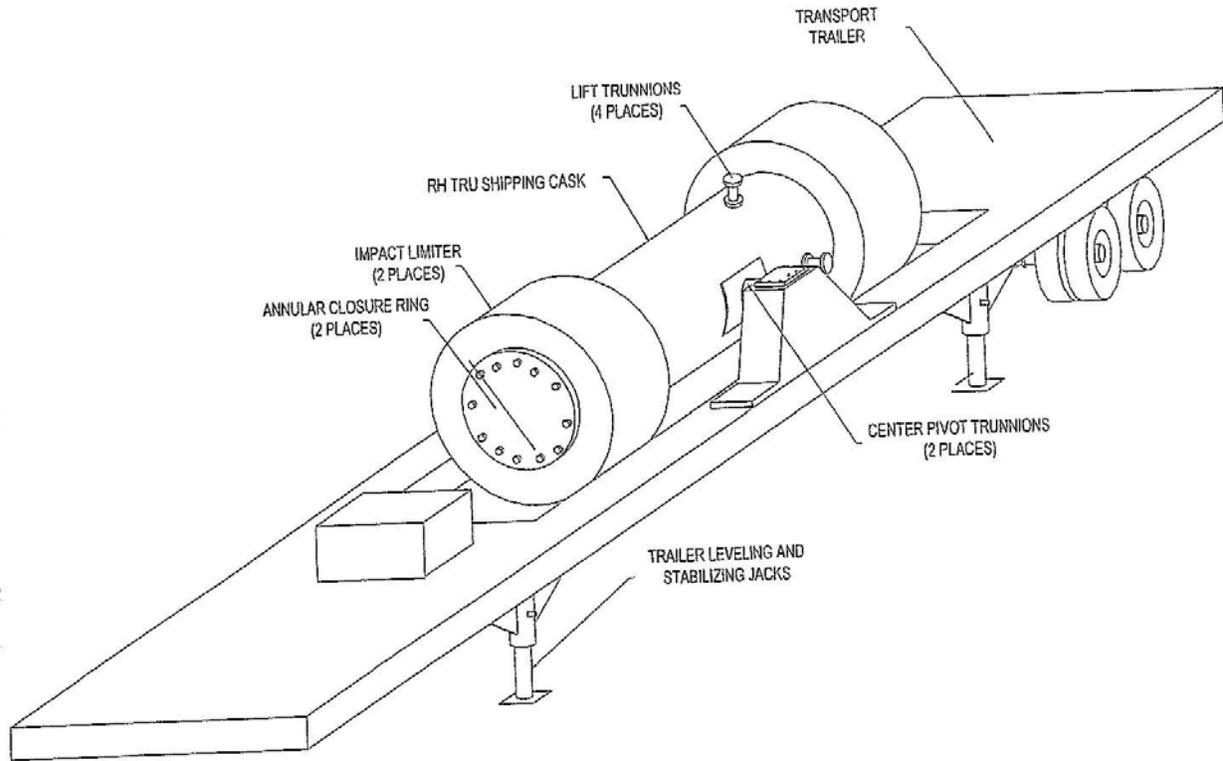
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Figure M1-17c
RH Canister Transfer Cell Storage Area



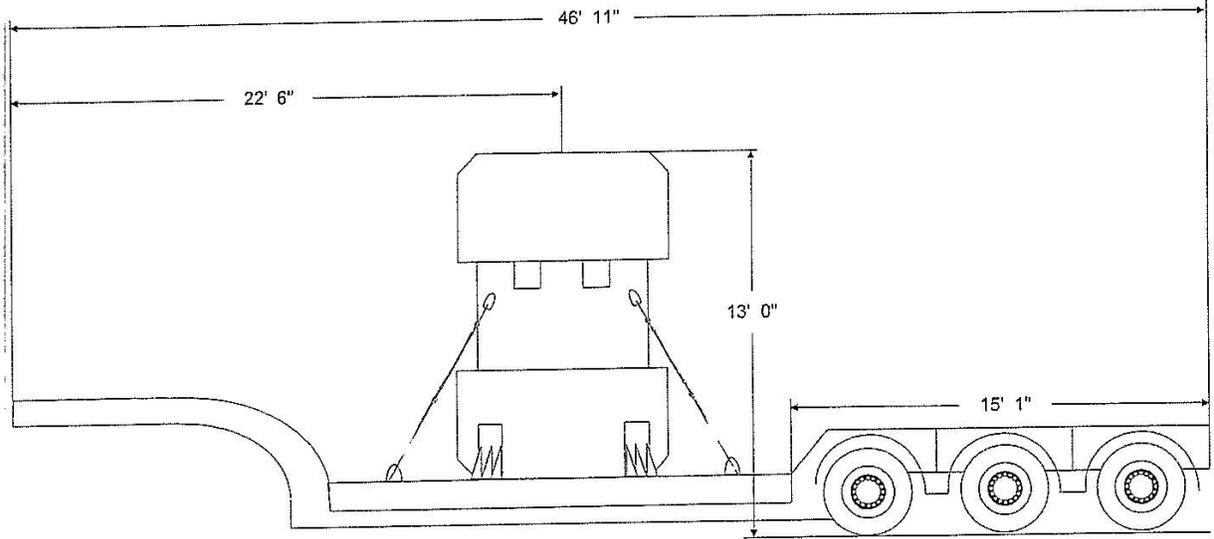
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Figure M1-17d
RH Facility Cask Loading Room Storage Area



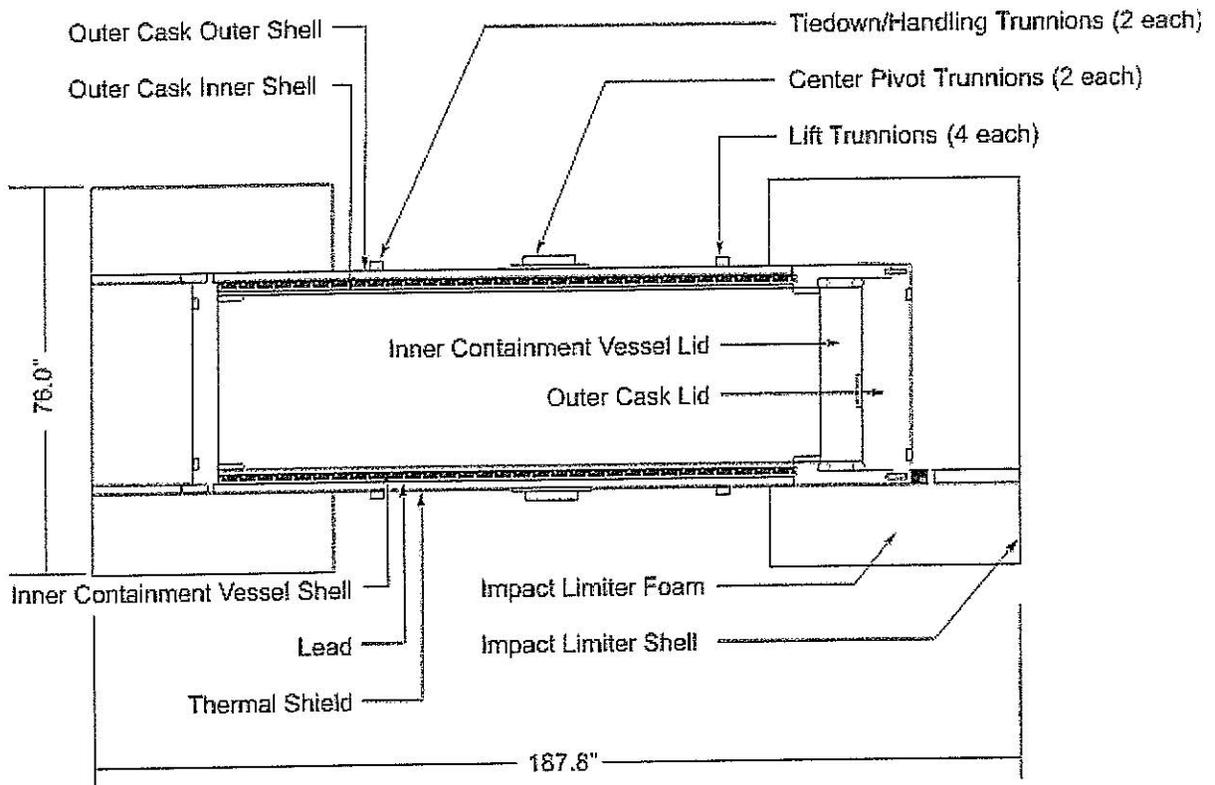
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Figure M1-18
RH-TRU 72-B Shipping Cask on Trailer



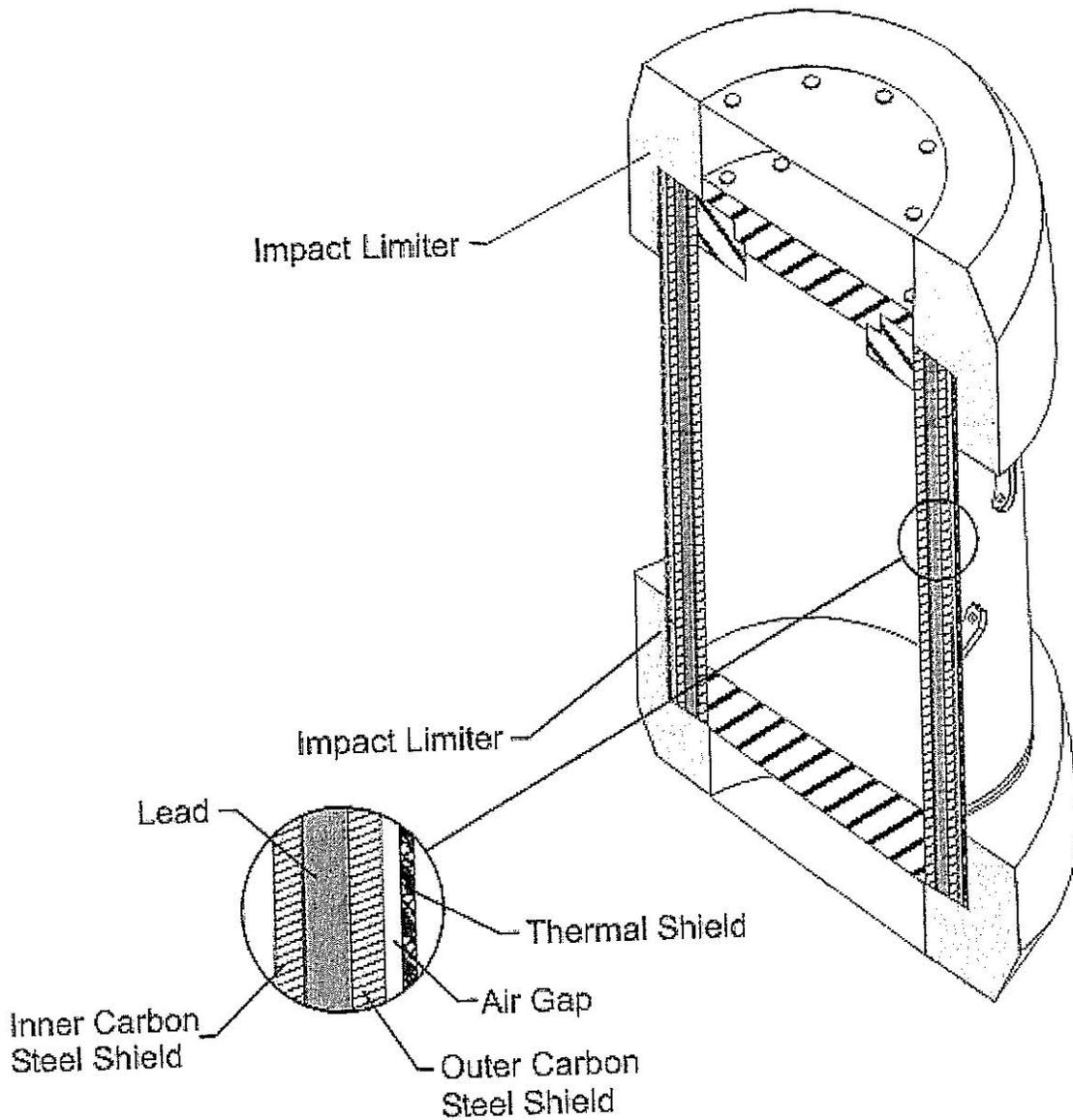
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Figure M1-19
CNS 10-160B Shipping Cask on Trailer



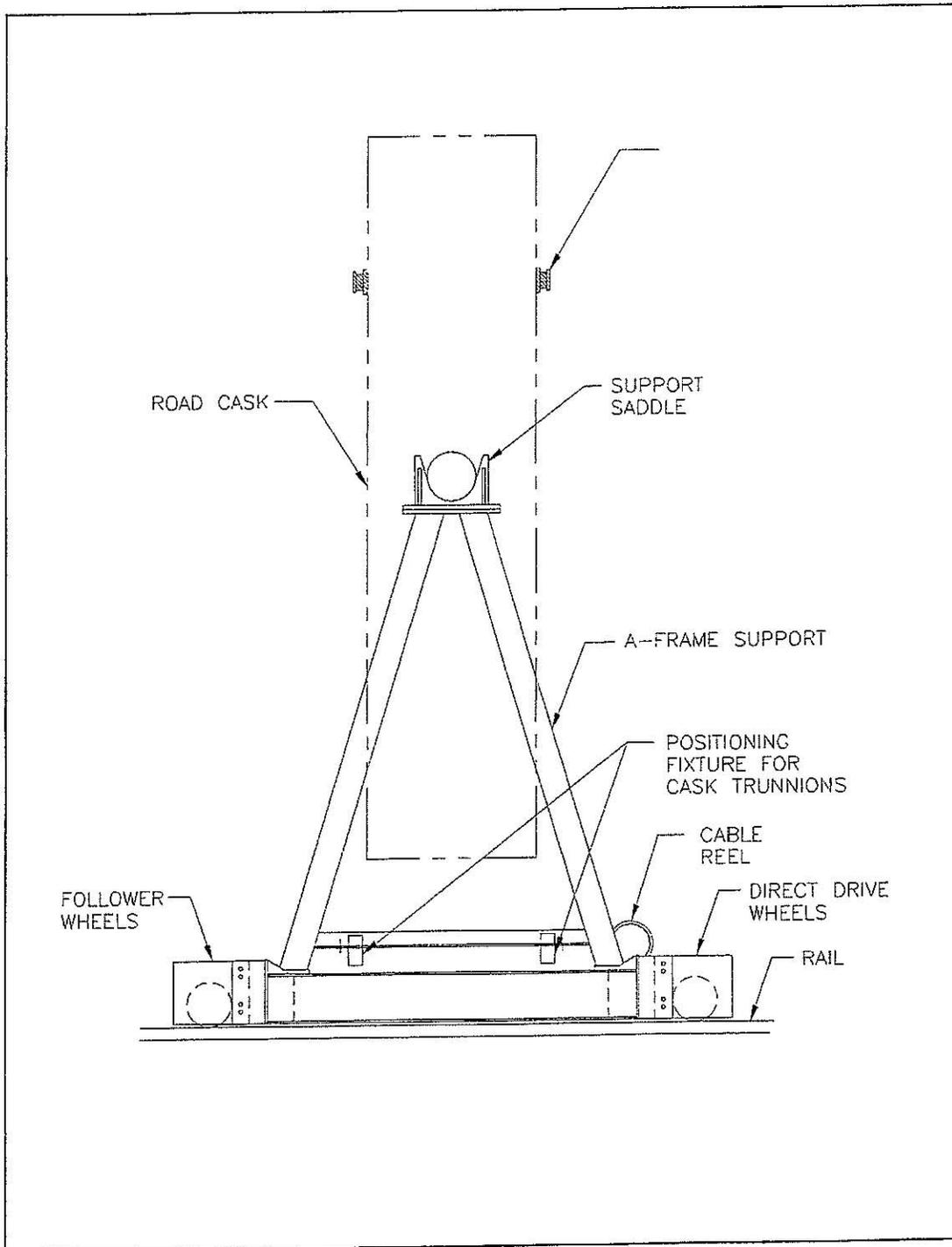
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Figure M1-20
RH-TRU 72-B Shipping Cask for RH Transuranic Waste (Schematic)



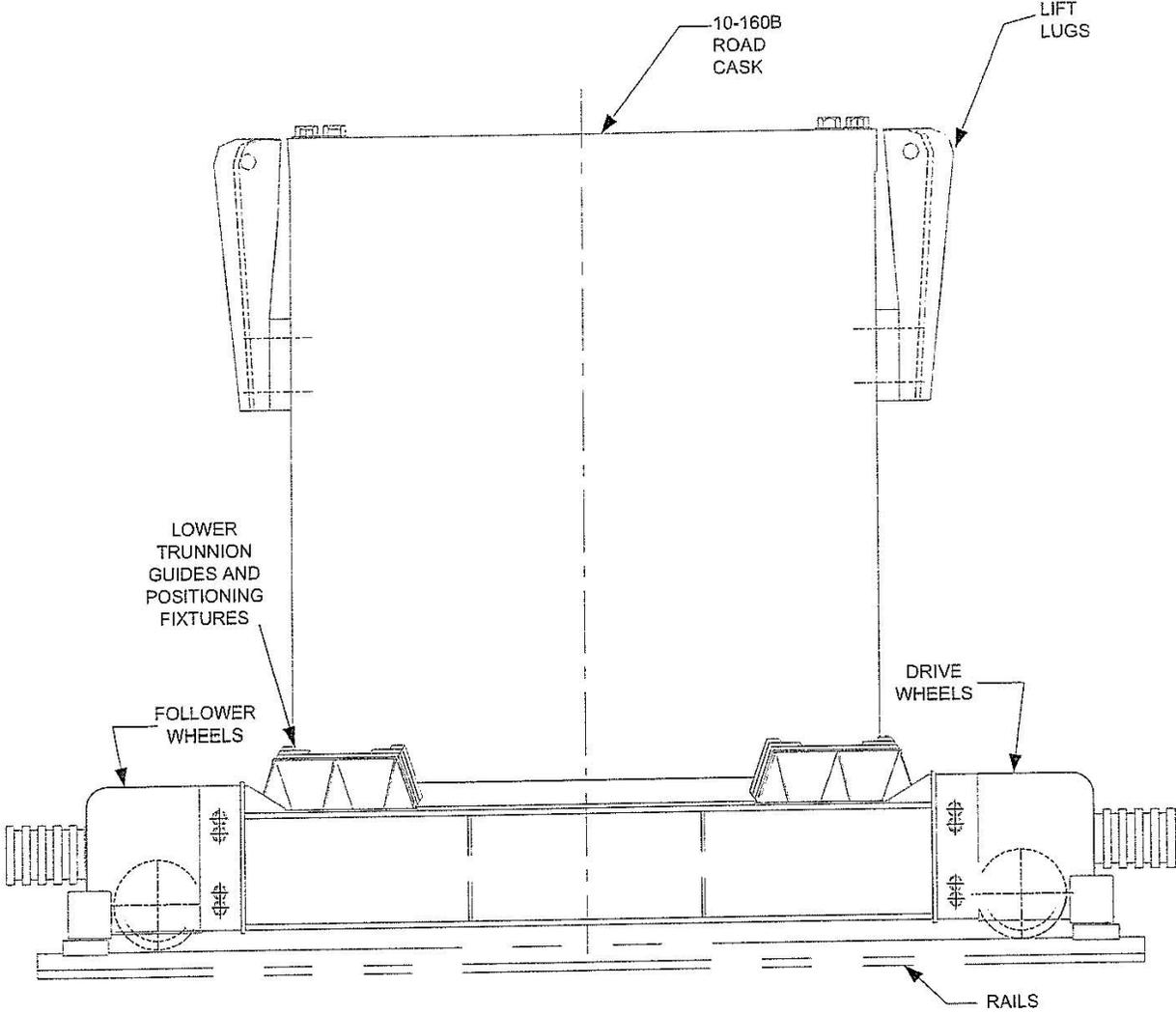
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Figure M1-21
CNS 10-160B Shipping Cask for RH Transuranic Waste (Schematic)



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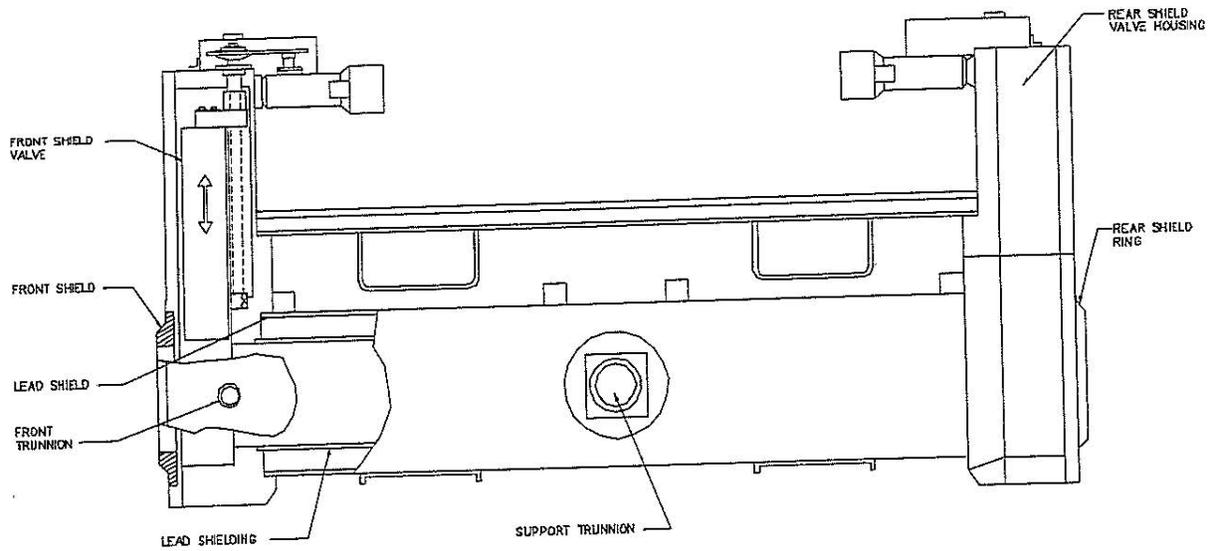
Figure M1-22a
RH-TRU 72-B Cask Transfer Car



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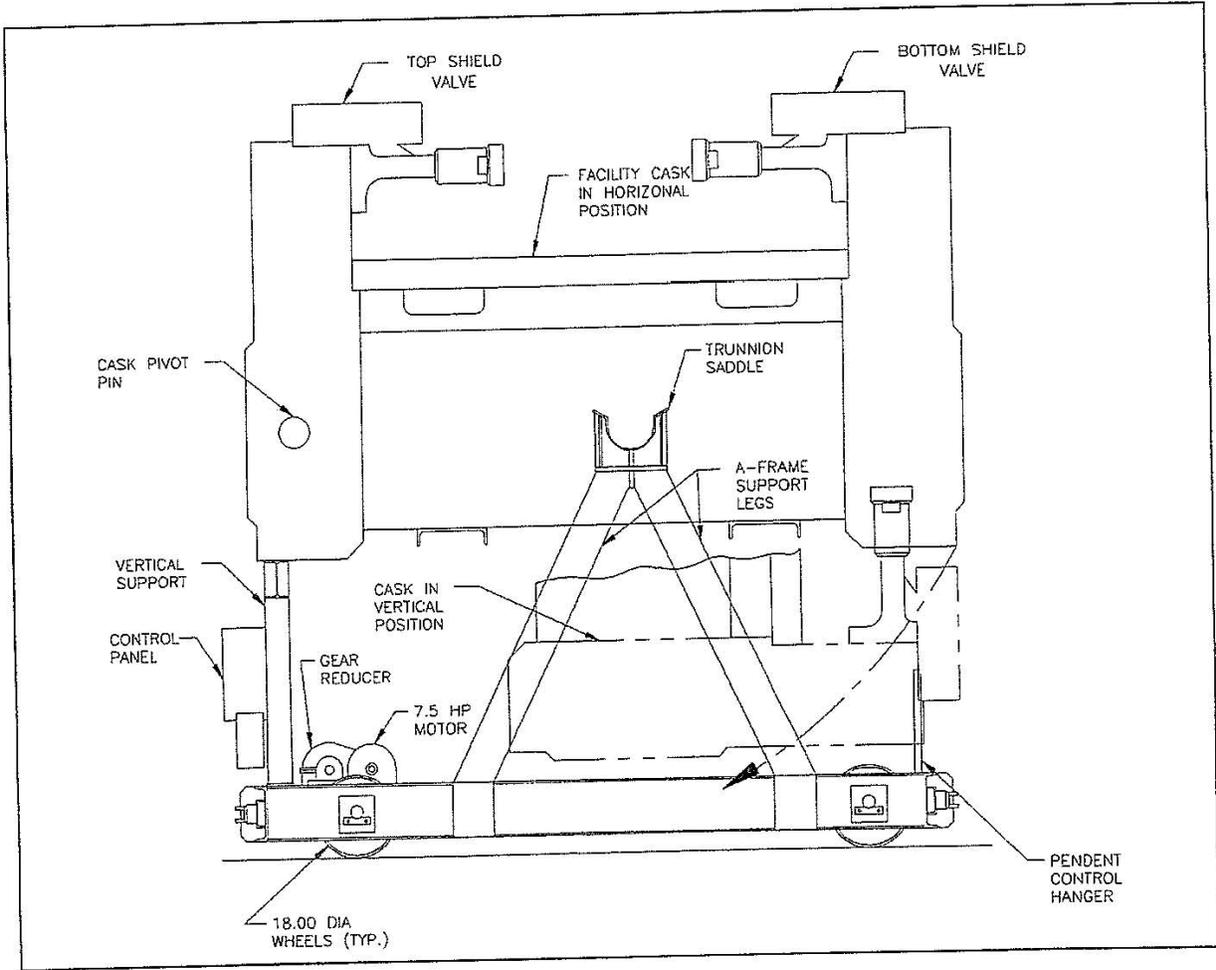
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Figure M1-22b
CNS 10-160B Cask Transfer Car



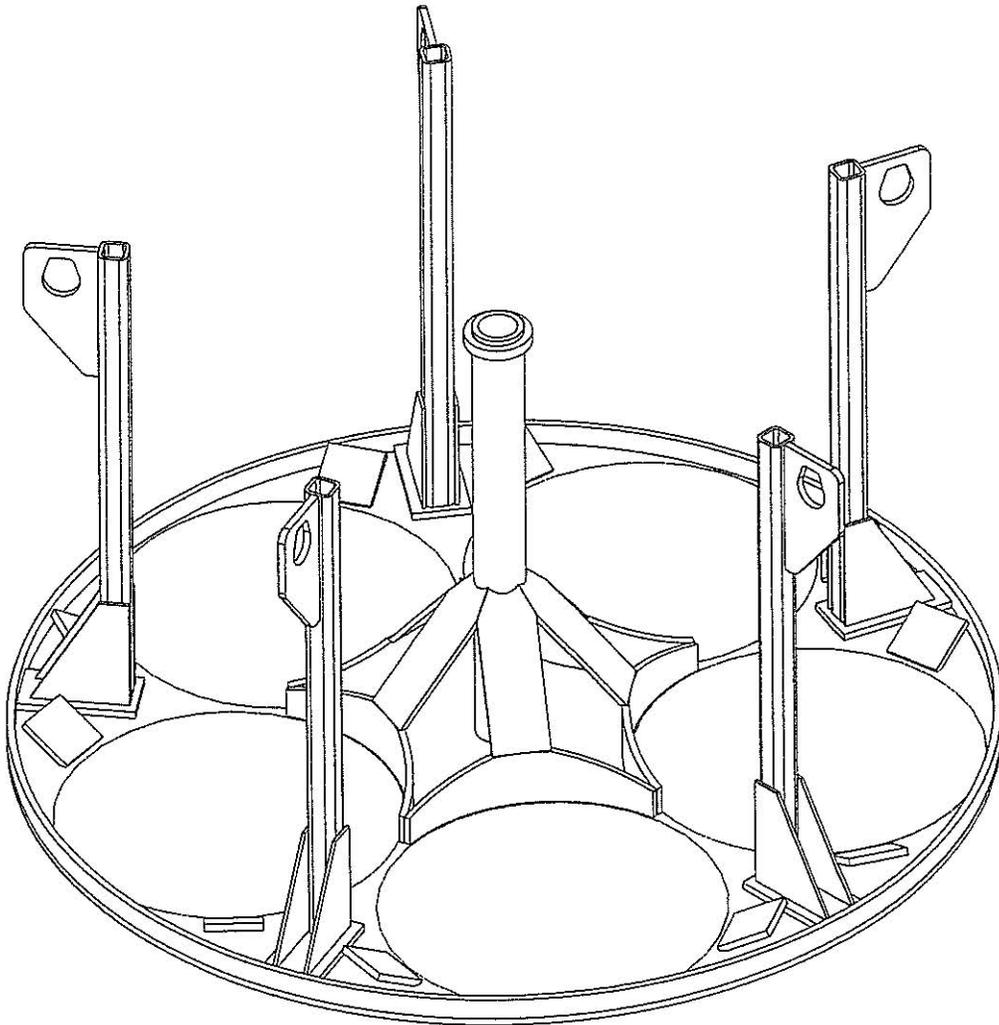
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Figure M1-23
RH Transuranic Waste Facility Cask



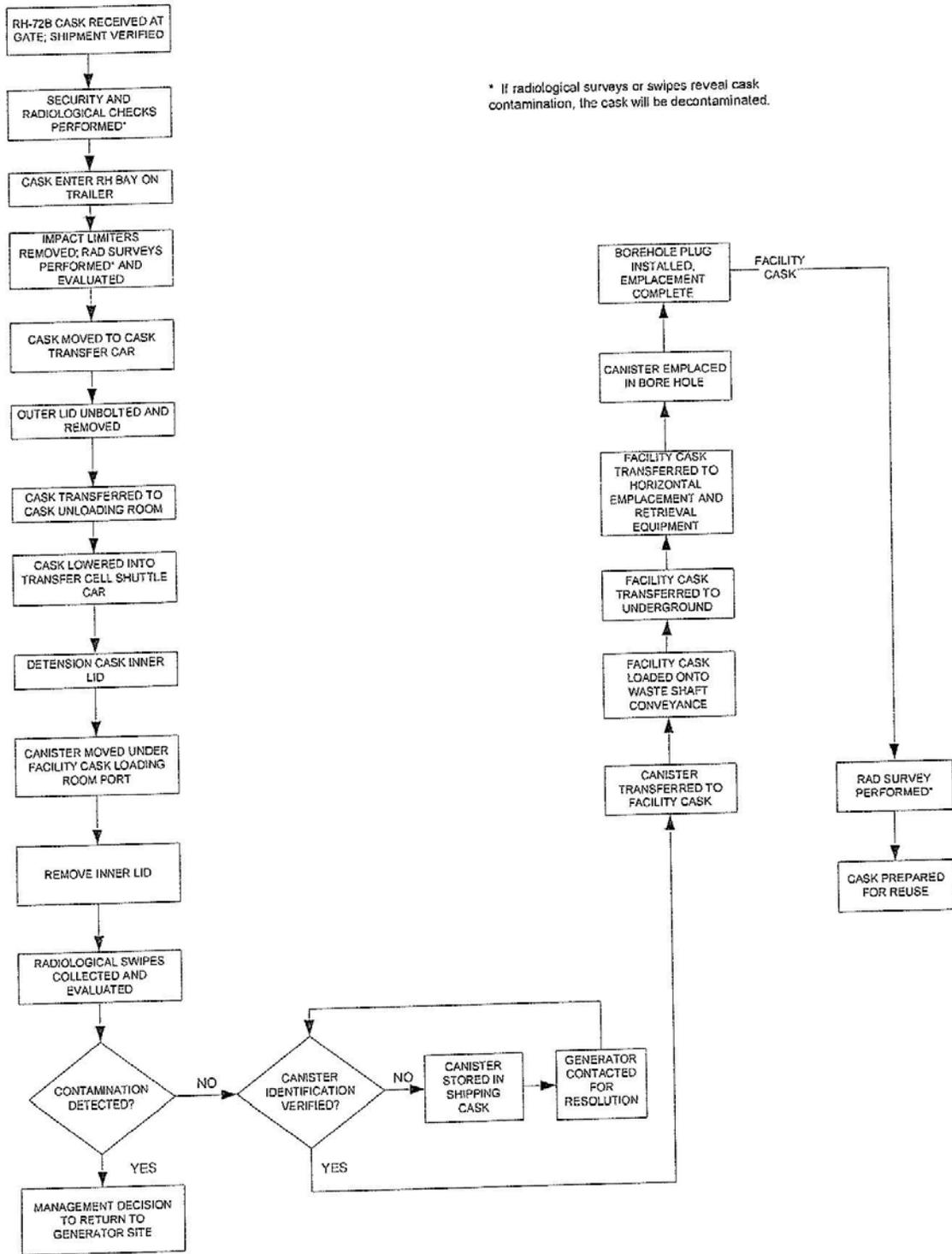
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Figure M1-24
RH Facility Cask Transfer Car (Side View)



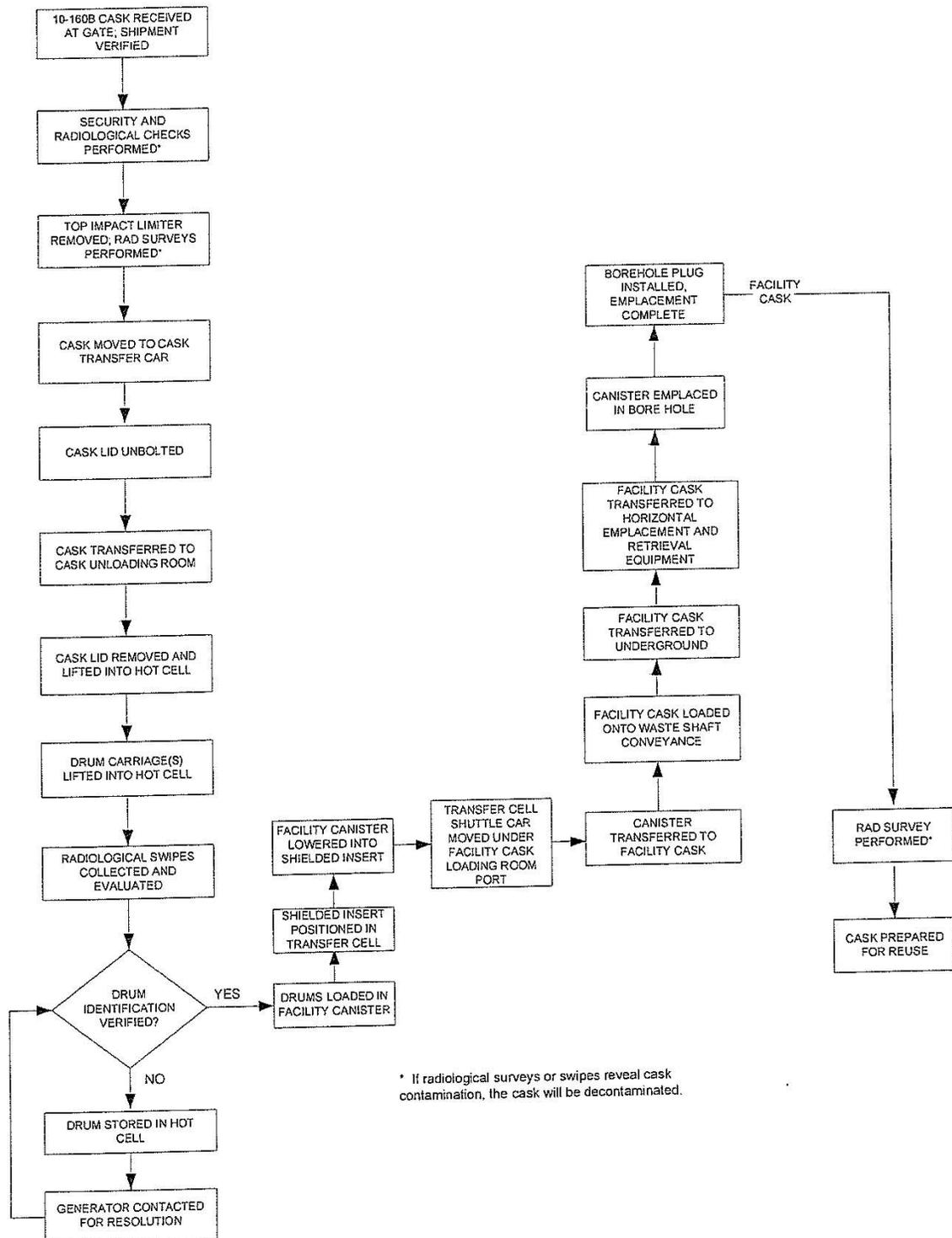
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Figure M1-25
CNS 10-160B Drum Carriage



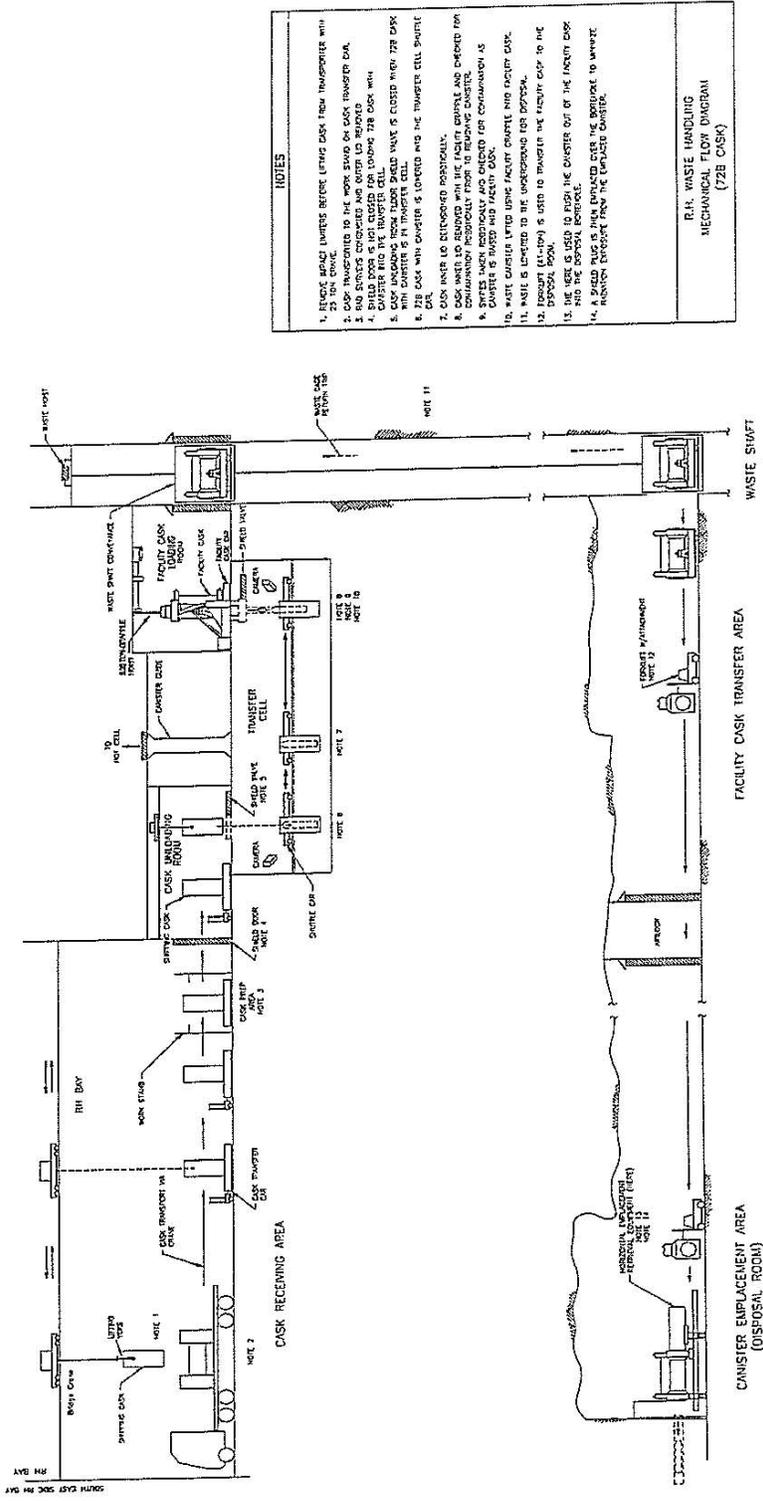
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Figure M1-26
 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for
 RH-TRU 72-B Shipping Cask



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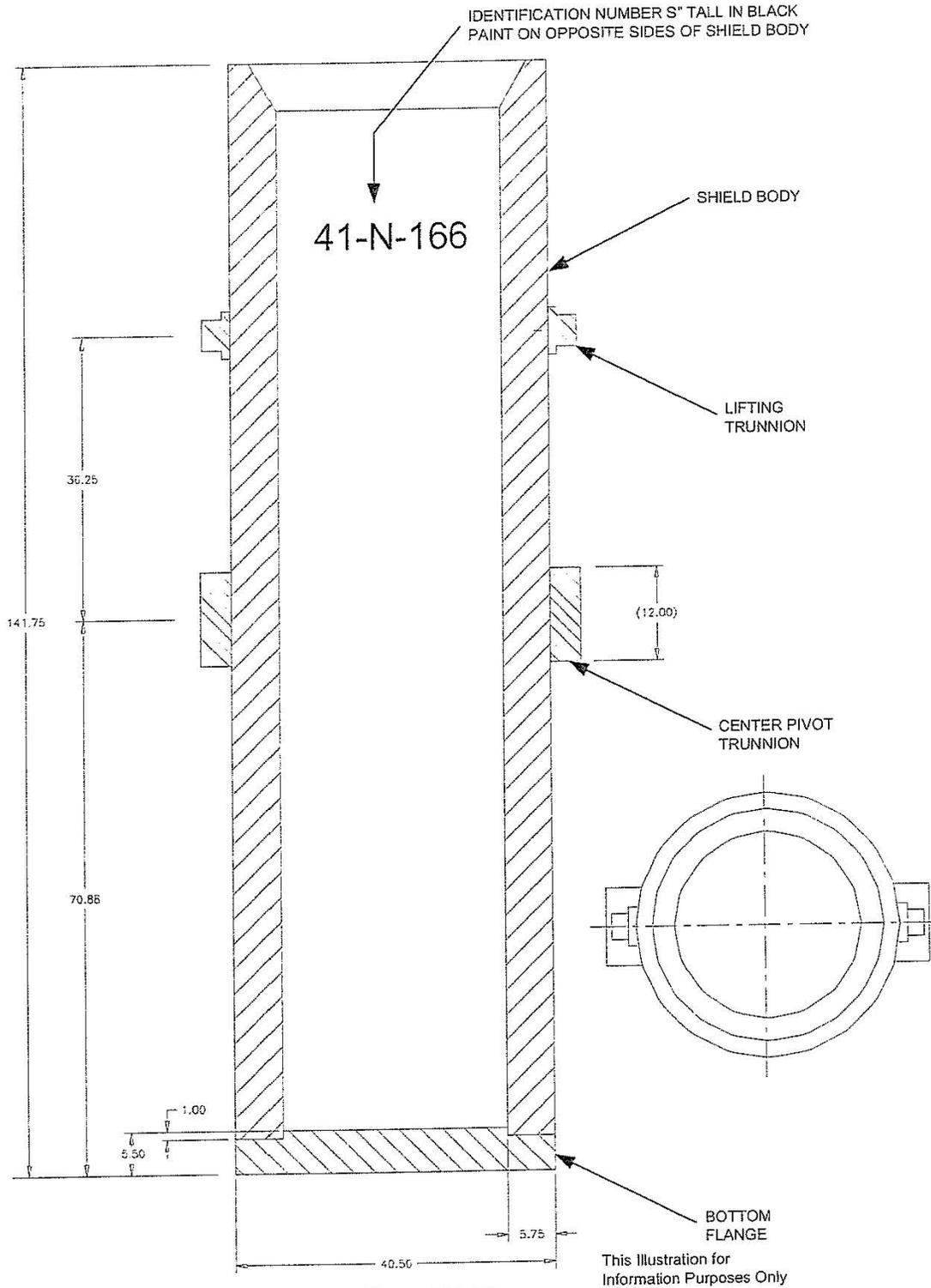
Figure M1-27
 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for
 CNS 10-160B Shipping Cask



- NOTES**
1. REMOVE BRACK LAMPERS BEFORE LIFTING CASK FROM TRANSPORTER WITH 25 TON CRANE.
 2. CASK TRANSPORTED TO THE WORK STAGING ON CASK TRANSFER CRANE.
 3. CASK TRANSPORTED TO THE DISK RECEIVING AREA ON CASK TRANSFER CRANE.
 4. BRACK DOOR IS NOT CLOSED FOR LOADING THE CASK WITH CASKER INTO THE TRANSFER CELL.
 5. CASK TRANSPORTED FROM WORK STAGING TO THE TRANSFER CELL ON CASK TRANSFER CRANE.
 6. THE CASK WITH CASKER IS CHECKED INTO THE TRANSFER CELL SHIPMENT DATE.
 7. CASK WATER IS DECONTAMINATED SEPARATELY.
 8. CASK WATER TO BE REMOVED WITH THE FACILITY CASKER, CHECKED FOR CONTAMINATION, AND THEN TRANSPORTED TO THE DISPOSAL ROOM.
 9. CASKER IS TAKEN APART AND CHECKED FOR CONTAMINATION AS CASKER IS TAKEN FROM FACILITY CASK.
 10. WASTE CASKER LIFTED USING FACILITY CRANE INTO FACILITY CASK.
 11. WASTE IS LOADED TO THE UNDERGROUND FOR DISPOSAL.
 12. DISCOUNT (41-104) IS USED TO TRANSFER THE FACILITY CASK TO THE DISPOSAL ROOM.
 13. THE FACILITY CASKER IS TAKEN TO THE DISPOSAL ROOM.
 14. A PAVED ROAD IS THEN DISPLACED OVER THE BRIDGE TO MAINTAIN ROUTATION EXISTING FROM THE EMPLOYEE CASKER.
- R.H. WASTE HANDLING MECHANICAL FLOW DIAGRAM (72B CASK)

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Figure M1-28
 Schematic of the RH Transuranic Mixed Waste Process for RH-TRU 72-B Shipping Cask

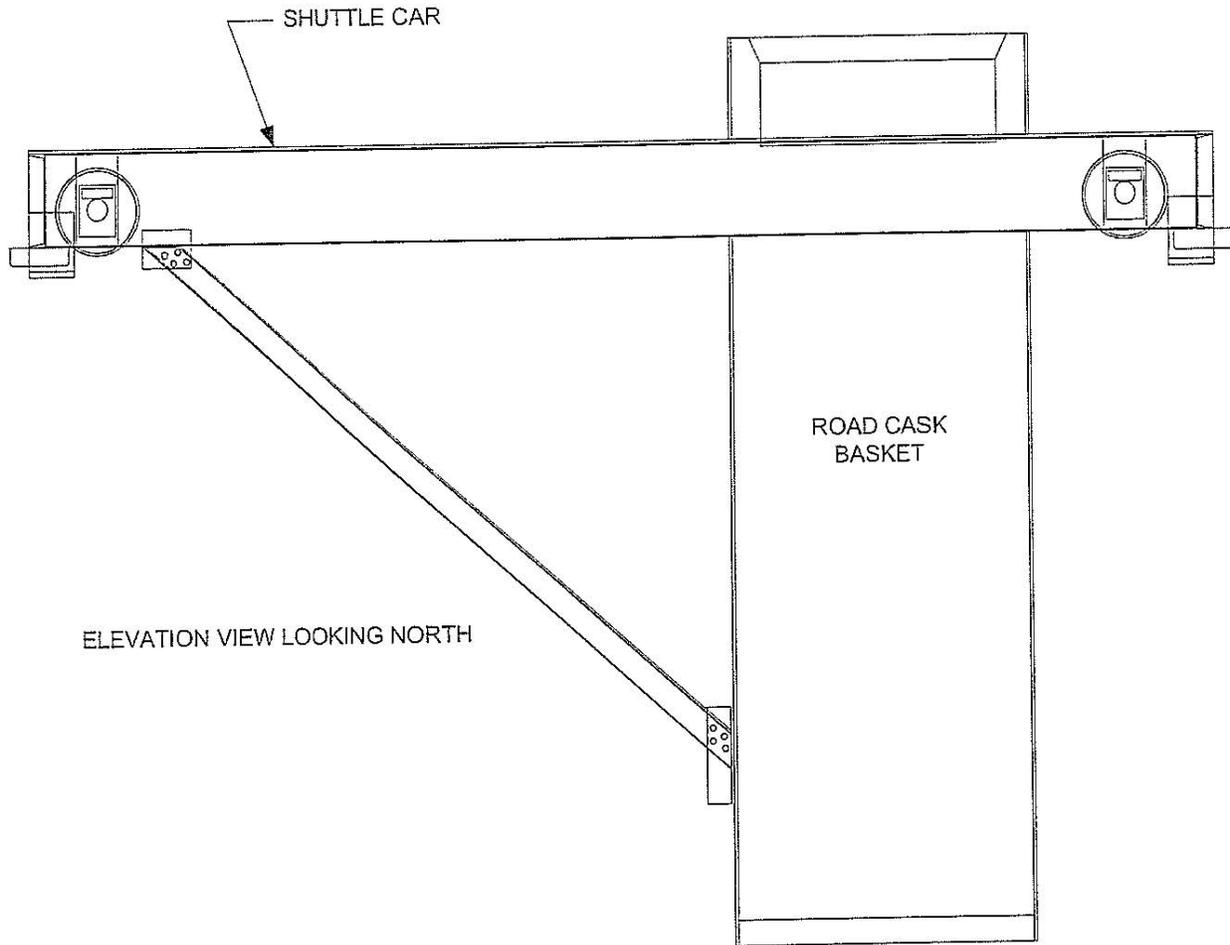


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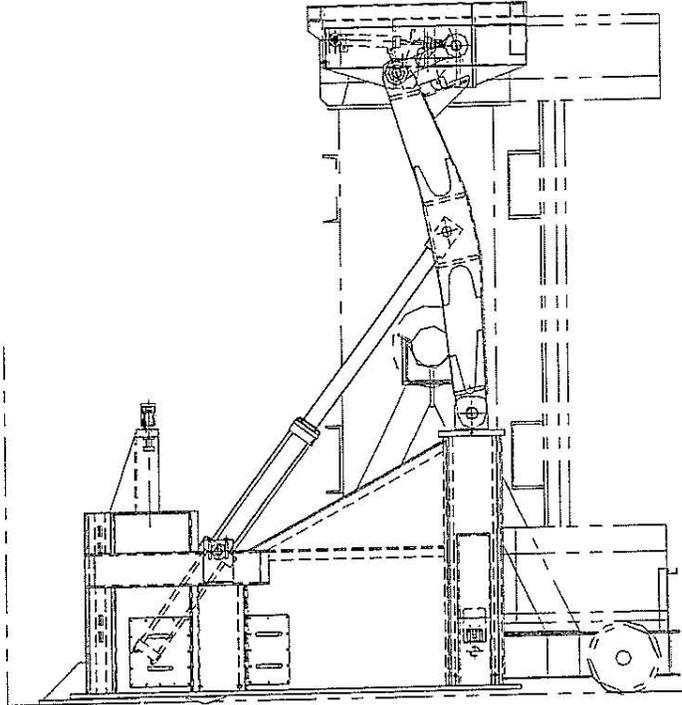
Figure M1-30
RH Shielded Insert Assembly



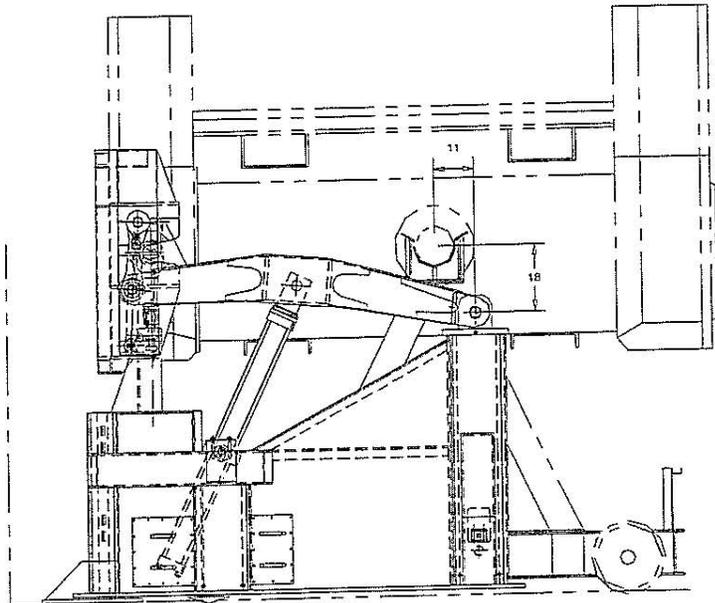
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Figure M1-31
Transfer Cell Shuttle Car



FRONT ELEVATION
CASK VERTICAL



FRONT ELEVATION
CASK HORIZONTAL

This illustration for
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Figure M1-32
Facility Rotating Device