



DOE Proposes Modification To Hazardous Waste Facility Permit

Changes to WIPP Hazardous Waste Facility Permit

Background

The U.S. Department of Energy (DOE) has proposed modifications to its Hazardous Waste Facility Permit (HWFP) for the Waste Isolation Pilot Plant (WIPP) to make DOE environmental cleanup efforts more efficient.

The New Mexico Environment Department (NMED) issued WIPP's HWFP (Permit Number: NM4890139088-TSDF) in October 1999. The proposed modification would allow the Permittees to improve operational efficiencies while continuing to ensure the safety of the employees, public and environment.

What is Proposed?

DOE submitted the Class 2 permit modification request to NMED on March 21, 2007. Below is a summary of the proposed changes:

- Establish tiered training requirements for personnel involved in the waste confirmation process. The HWFP (Attachments B7, H1 and H2) require that personnel performing waste confirmation be qualified to perform actual Real Time Radiography (RTR) and Visual Examination (VE). Currently, the majority of confirmation work requires the review of RTR/VE media and/or records, not actually performing the technique.

The Permittees wish to increase the number of trained confirmation personnel to ensure sufficient staff is available to perform confirmation work. Currently, qualifying confirmation personnel takes from four to six months of intense training. Additional staff does not need to be trained to operate radiography equipment; therefore, the Permittees propose a training program that qualifies personnel for records review only.

The Permittees are requesting that the training be divided into two levels. The first level would require personnel be trained only to view RTR and VE media and/or review records because they would not be required to perform the actual RTR/VE procedure. The second level would train confirmation personnel to the

current requirements, enabling them to also perform the actual RTR and VE process. The first level of training can be administered in significantly less time.

- Remove references to the “brush truck” from the permit. The Permittees no longer plan to use this piece of fire fighting equipment and instead will use a newer “Seagraves” Fire Truck. The Seagraves fire truck is more reliable for off-road use.
- Remove the annual preventive maintenance reference as it pertains to the Overhead Bridge Crane located in the remote-handled bay. Attachment D, Table D-1a identifies PM041232, requiring a quarterly and annual preventative maintenance procedure for this crane. These inspections include the hook, wire rope and hoist load block. Inspections are already performed on a quarterly basis; therefore, an additional annual inspection is not necessary. (Annual preventive maintenance is performed in accordance with another procedure listed in Table D-1a).
- Remove the reference to the annual preventive maintenance procedure in Attachment D, Table D-1a (PM041190) of the WIPP HWFP for the Cask Unloading Room Crane. The current reference requires a quarterly and annual preventive maintenance procedure. Preventive maintenance is now performed quarterly on this crane; therefore, it is not necessary to perform the same procedure annually. (Annual preventive maintenance inspections for the Cask Unloading Room Crane are performed in accordance with other procedures listed in Table D-1a).
- Change the frequency of the preventive maintenance procedure for the Horizontal Emplacement and Retrieval Equipment in Attachment D, Table D-1 (PM052010) from monthly to semi-annually. This equipment is used for the emplacement of remote-handled transuranic waste. It is inspected prior to each evolution; therefore, an additional monthly inspection is not necessary. The procedure only involves using compressed air to remove dust from the motors, replace filters, and greasing designated areas of the equipment. Use of this equipment over a three-year period indicates that semi-annual inspections and preventive maintenance is adequate.
- Clarify permit language referencing preventive maintenance and instrument control procedures. Surface operations maintenance personnel or mine maintenance personnel conduct preventive maintenance procedures. Instrument technicians perform instrument control procedures. This clarification is needed to

distinguish that personnel who perform preventive maintenance and instrument and calibration procedures are not trained as operators as identified in the HWFP Attachments H1 and H2.

- Attachment F, Section F-2 of the WIPP HWFP stipulates the staffing requirements necessary for activating the WIPP Emergency Operations Center (EOC). The proposed change would reduce the number of key personnel required to activate the EOC, but does not reduce the full staffing levels required to operate the EOC. This change will allow for more timely activation of the EOC.
- Table F-1 lists the material at WIPP that would qualify as a Level II incident in accordance with National Fire Protection Association (NFPA 471). The Permittees are requesting that the text in this table be updated to include any size waste containers of contact-handled or remote-handled TRU mixed waste.
- A revised Fire Hazard Analysis for the WIPP site was approved in June 2006. The new analysis indicates that the WIPP Waste Handling Building is equipped with a sprinkler system that was designed and installed to meet the requirements of the National Fire Protection Association (NFPA 13-Standard for Installation for Sprinkler System). All sprinkler risers were inspected and no deficiencies were noted. It was determined that the fire protection system met the requirements of DOE-STD-1066-99 (Fire Protection Design Criteria) and DOE Order 420.1A (Facility Safety, U.S. Department of Energy).

The WIPP facility is additionally equipped with occupant-use hose stations (standpipes), which are defined in the HWFP as internal fire hose connections. The Fire Hazard Analysis indicates that: "In all practical interior fire fighting operations, the only time firefighters would use a standpipe would be if they could not advance hose lines into the fire area. Since the existing hose stations were only designed for occupant use and the physical layout of the facilities allows for full hose stream access by firefighters, the existing hose station locations would not be needed for fire fighting activities. . ."

The Permittees are requesting to remove the requirement to maintain the internal fire hose connections in Attachments E and F, as they are not required to maintain adequate fire protection. In addition, the Permittees are requesting to delete the pictorial representation of fire hose in two figures in Attachment F.

Comments

Comments for the record must be sent to Mr. Steve Zappe, New Mexico Environment Department, 2905 Rodeo Park Drive, Building 1, Santa Fe, NM 87505. They also may be e-mailed: steve_zappe@nmenv.state.nm.us or faxed to 505-476-6060. Only written comments will be accepted and must be received no later than 5 p.m. (MDT) on May 25, 2007. A copy of the permit modification may be viewed or copied at the NMED offices of Mr. Zappe. To be placed on the WIPP mailing list, contact Mr. Zappe at the address above.

**For more
Information**

For more information about transuranic waste shipments and procedures, call the WIPP Information Center at 1-800-336-WIPP (9477). You also may visit the WIPP home page at <http://www.wipp.energy.gov>. Comments to the Permittees regarding this permit modification may be sent to Mr. Bobby St. John, Washington TRU Solutions LLC, P.O. Box 2078, Carlsbad, NM 88221.