

Notice of Class 1 Permit Modification

**Correct Description of Filter Vent Location on Standard Waste Boxes and
Ten-Drum Overpacks**

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

WIPP HWFP Number NM4890139088–TSDF

March 21, 2002

Transmittal Letter



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
March 28, 2002

Mr. Steve Zappe, Project Leader (WIPP)
Hazardous Waste Permits Program
Hazardous Waste Bureau
New Mexico Environment Department
2909 E. Rodeo Dr. Bldg 1
Santa Fe, New Mexico 87502-6303

RE: Notification of a Class 1 Permit Modification to the Hazardous Waste Facility
Permit to Correct the Description of Filter Vent Location on Standard Waste Boxes
and Ten-Drum Overpacks, Permit Number: NM4890139088-TSDF

Dear Mr. Zappe:

The purpose of this letter is to submit this notification of a Class 1 modification to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Number: NM4890139088-TSDF. The proposed changes do not compromise worker safety, human health, or the environment. The purpose of this modification is to correct the description of the filter vent location on standard waste boxes (SWBs) and ten-drum overpacks (TDOPs).

A similar permit modification notification was submitted to the New Mexico Environment Department (NMED) on August 8, 2000. On February 25, 2002, the NMED revised the proposed modification language due to comments it had received from the Environmental Evaluation Group (EEG) citing safety concerns surrounding the location of filter vents. Since receipt of this letter, the Permittees have discussed this issue with both the NMED and EEG and have learned that the EEG's concerns surrounded the location of filter vents on the side of drums and not SWBs or TDOPs. As a result of a conversation with Mr. Steve Holmes this permit modification notice is being submitted as a Class 1 administrative and informational change to correct the modified language. Since the previous class 1 modification was invoiced and paid, the Permittees should not be required to pay to administer this correction. Please note that we have also found a minor typographical error in NMED's General Comments Regarding Class 1 Permit Modifications that were attached to your letter of February 25, 2002. On the last page of your comments, immediately following Item 6.a., the year referenced, i.e., August 8, **2001**, should be August 8, **2000**.

Mr. Steve Zappe

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March 28, 2002

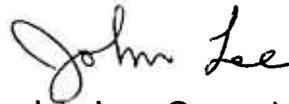
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Thank you for your attention to this matter. If you have any questions regarding the permit modification or waiver of administrative fees, please contact Mr. Jody Plum at (505) 234-7462.

Sincerely,



Dr. Inés R. Triay, CBFO Manager
U. S. Department of Energy



J. L. Lee, General Manager
Westinghouse TRU Solutions LLC

Enclosure

cc: w/enclosure
C. Walker, Techlaw

cc: w/o enclosure
J. Bearzi, NMED
J. Kieling, NMED
P. Ritzma, NMED
P. Maggiore, NMED

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Acronyms and Abbreviations

CBFO	Carlsbad Field Office
CFR	Code of Federal Regulations
DOE	Department of Energy
HWFP	Hazardous Waste Facility Permit
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
PMN	Permit Modification Notification
SWB	Standard Waste Box
TDOP	Ten-Drum Overpack
WIPP	Waste Isolation Pilot Plant
WTS	Westinghouse TRU Solutions, LLC

Overview of Permit Modifications Notification

This document contains a Class 1 Permit Modification Notification (**PMN**) to the Hazardous Waste Facility Permit (**HWFP**) at the Waste Isolation Pilot Plant (**WIPP**), WIPP HWFP Number NM4890139088–TSDf hereinafter referred to as the WIPP HWFP.

This notification of permit modification is being submitted by the U.S. Department of Energy (**DOE**), Carlsbad Field Office (**CBFO**) and Westinghouse TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with the WIPP HWFP, Condition I.B.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating 40 Code of Federal Regulations (**CFR**) § 270.42(a)). This PMN is necessary to correct an error in the HWFP. This change does not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modification to the WIPP HWFP and related supporting documents are provided in the following sections of the PMN. The proposed modification to the text of the WIPP HWFP have been identified using a double underline for new information added and a ~~strikeout~~ font for information proposed for deletion. There is also a right hand /outside margin Revision Bar to assist in location of all additions.

Attachment A

Proposed Modified Permit Text

Table 1. Class 1 Permit Modification Notification

No.	Affected Permit Sections	Item	Category	Attachment A Page #
1	a.1 M1-1b	Correct description of the filter vent location on standard waste boxes and ten-drum overpacks.	A.1	A-3

Item 1

Correct Description of Filter Vent Location for Standard Waste Boxes and Ten-Drum Overpacks

Description:

Modify the text in the Hazardous Waste Facility Permit (HWFP) Attachment M1 to correctly describe the location of filter vents on Standard Waste Boxes and Ten-Drum Overpacks.

Basis:

The Standard Waste Box and the Ten Drum-Overpack are designed with filter vents on the body of the container and not on the lid. Figures M1-4 and M1-5 show the correct position of the filters on these containers. The text in Attachment M1-1b and M1-1d(1) is currently inconsistent with the figures and container designs.

Discussion:

The revised permit text from the NMED dated February 25, 2002 makes the language in Attachment M1-1b inconsistent with Figures M1-4 and M1-5, with regards to the location of filter vents on SWBs and TDOPs. Therefore, the Permittees are submitting a Class 1 modification to correct the text in Attachment M1-1b.

Revised Permit Text:

a.1 Attachment M1-1b

Standard Waste Boxes

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

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

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

Ten-Drum Overpack

The TDOP is a metal container, similar to a SWB, that meets DOT specification 7A and is certified to be noncombustible and to meet all applicable requirements for Type A packaging. The TDOP is a welded-steel, right circular cylinder, approximately 74 inches (in.) (1.9 meters (m)) high and 71 in. (1.8 m) in diameter (Figure M1-5). The maximum loaded weight of a TDOP is 6,700 pounds (lbs) (3,040 kilograms (kg)). A bolted lid on one end is removable; sealing is accomplished by clamping a neoprene gasket between the lid and the body. Filter ports One or more filter vents are located near the top of the TDOP on the body ~~One or more filtered vents (as described in Section M1-1d(1)) will be installed in the TDOP lid~~ to prevent the escape of any radioactive particulates and to

eliminate any potential of pressurization. A TDOP may contain up to ten standard 55-gal (208-L) drums or one SWB. TDOPs may be used to overpack drums or SWBs containing CH TRU mixed waste. Figure M1-5 shows a TDOP.