



Department of Energy

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APR 22 2015

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Subject: Request for Additional Extension of Storage Time at the Waste Isolation Pilot Plant Facility, Hazardous Waste Facility Permit Number NM4890139088-TSDF

Reference: New Mexico Environment Department correspondence from Ryan Flynn to Jose Franco and Robert L. McQuinn, dated November 7, 2014, subject: Request for Additional Extension of the Waste Handling Building Storage Time at the Waste Isolation Pilot Plant EPA I.D. NM4890139088

Dear Mr. Kieling and Ms. Roberts:

In accordance with the above-referenced letter, the Permittees are providing the enclosed written proposal requesting an extension of storage time for the transuranic (TRU) mixed waste currently stored in the Waste Handling Building (WHB) at the Waste Isolation Pilot Plant (WIPP) facility. The proposal addresses alternative storage and disposal options and addresses: potential impacts to human health and the environment; provides information relative to alternative storage options that includes a thorough analysis of the Permittees' concerns with returning the waste to the generator storage sites; provides a description of any options for emplacement of waste underground; and provides a description of current thermography measurements.

In April 2015, the Accident Investigation Board (AIB) issued the Accident Investigation Report Phase 2, Radiological Release at the Waste Isolation Pilot Plant, February 14, 2014. The AIB determined that the cause of the energetic release to be an exothermic reaction from a single drum of nitrate salt bearing waste. This addresses the primary concern expressed by the New Mexico Environment Department (NMED) in the referenced letter with regard to longer extensions of time.

In December 2014, the Interim Performance Measurement Baseline (PMB) was approved by the U. S. Department of Energy. The PMB presents the scope, cost and schedule activities that comprise the WIPP recovery and return to operations. Under the Work Breakdown Structure Element 1.7.6, emplacement of the above ground stored waste is anticipated to be completed by June 30, 2016.

Therefore, consistent with the findings of the AIB and the PMB schedule, the Permittees request an extension of storage time for Contact-Handled (CH) TRU mixed waste stored in the WIPP WHB until June 30, 2016.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our 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 our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

J. Kieling/K. Roberts

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If you have any questions, please contact Mr. George T. Basabilvazo at (575) 234-7488.

Sincerely,

Original Signatures on file

José R. Franco, Manager
Carlsbad Field Office

Robert L. McQuinn, Project Manager
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure

R. Maestas, NMED *ED

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CBFO M&RC

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Proposal for Request for Extension of the Waste Handling Building Storage Time at the Waste Isolation Pilot Plant, EPA I.D. Number NM4890139088, February 23, 2015

1.0 Introduction

In accordance with the November 7, 2014, letter from the New Mexico Environment Department (NMED), the Permittees are requesting an extension of storage time for the transuranic (TRU) mixed waste currently stored in the Waste Handling Building (WHB) at the Waste Isolation Pilot Plant (WIPP). The waste in storage originated from 19 shipments of contact-handled (CH) TRU waste from generator/storage sites and from replacement of filters in the underground ventilation system. Some of the waste from the original 19 shipments was downloaded and disposed prior to suspension of normal waste handling operations on February 5, 2014; however, the following text is based on shipments as a convenient unit for discussion purposes. Since waste disposal operations will not resume by May 6, 2015, this proposal to extend the storage time for waste stored in the WHB has been prepared, pursuant to the requirements in the letter from the NMED listed below:

- Reevaluate alternative storage options;
- Address potential impacts to human health and the environment;
- Provide information about alternative storage options, including a thorough analysis of the Permittees' issues with returning waste to generator/storage sites;
- Provide a description of any options or plans for emplacement of the waste in the underground; and
- Provide a description of current thermography measurements.

The above information has been provided in previous extension requests demonstrating that continued storage of waste in the WHB CH Bay is protective of human health and the environment and is the best alternative. This request provides some updates to the information in the extension of storage time requests submitted to the NMED on August 29, 2014 and November 3, 2014.

In February, 2015, the DOE Accident Investigation board (AIB) completed their investigations and are expected to issue the Phase 2 report on the radiological release this April. The AIB concluded based on their video investigations of Panel 7, Room 7, that only one breached container was identified and that was container LA00000068660 from waste stream LA-MIN02-V.001. This is consistent with what has been previously reported to the NMED. None of the Los Alamos National Laboratory (LANL) waste currently in WHB storage is from the LA-MIN02-V.001 waste stream. Therefore, continued storage of the waste that is currently being stored in the WHB poses no additional hazards to human health or the environment due to the presence of nitrate salts. This addresses the primary concern expressed in the November 7, 2014, letter from the NMED with regard to longer extensions of time.

In December, 2014, the interim performance measurement baseline (PMB) was approved by the U.S. Department of Energy (DOE). The PMB presents the scope, cost, and schedule activities that comprise the WIPP recovery and return to operations, including both operating and capital asset project scopes of work. Under work breakdown structure Element 1.7.6, emplacement of the above ground stored waste is anticipated to be completed by June 30,

2016. Therefore, consistent with this schedule, the Permittees request an extension of storage time for CH TRU mixed waste stored in the WIPP WHB until June 30, 2016.

2.0 Potential Impacts to Human Health and the Environment Associated with Current Storage Configuration

The Permittees have determined that continuing to store the waste in the WHB is appropriate because it minimizes risk to human health and the environment since the waste will not need to be handled, moved, or transported to another location. This determination is based on the following factors:

- Waste is being stored in accordance with WIPP standard operating procedures that implement the Permit requirements and WIPP safety requirements.
- The WIPP facility is permitted and secure. Storage area inspections are conducted weekly as required by the Permit, and surface storage areas were not adversely impacted by the fire and radiological incidents at the WIPP facility.
- The storage limits in the Permit were negotiated at the time the Permit was originally issued and renewed. The storage limits were based on operational expectations and do not represent any physical limitations imposed by the facility. The Part A Permit Application for the 2009 Renewal Application identifies a 25-year WIPP operational life. It was anticipated that the CH Bay would frequently be at or near its permitted capacity throughout the 25-year life. Waste would be downloaded from the CH Bay while waste in the Parking Area Unit was being taken into the CH Bay for storage prior to processing for disposal. Moreover, the Permit allows for surge storage under certain conditions. Therefore, a WHB at or near capacity has always been part of the normal permitted operations.
- The Permittees have demonstrated that they can successfully manage the waste over longer storage times with no impact to human health and the environment. The waste in the WHB has been safely stored for more than 1 year.
- Emissions from the WHB are continuously filtered through high-efficiency particulate air filters. The WHB filtration system protects on-site workers and the public from airborne particulate releases, should there be any.
- Leaving the waste in place minimizes the number of times it has to be handled and moved, further reducing risk from accidental spills or releases. There are no additional costs associated with this option. The waste inside of the WHB is in static storage and is in a safe configuration in a controlled environment. There are no active waste management activities being performed; therefore, there is no risk of drum punctures, dropping of drums, or other incidents resulting from the active management of waste containers. Furthermore, access to the CH Bay is restricted as suggested in the September 10, 2014 and November 7, 2014 letters from the NMED, except for required activities, such as routine inspections and preventative maintenance activities.

The technical requirements in the Permit, Part 3, Section 3.1.1., based on 20.4.1.500 NMAC (incorporating 40 CFR §§264.170 through 264.178, *Container Management Practices*), are applied to the operation of the WHB unit in order to protect human health and the environment. The following summarizes the status of the weekly inspections and inspection requirements demonstrating that the waste stored in the WHB poses no potential impacts to human health and the environment:

- The waste containers presently stored in the WHB are in good condition. Waste containers are free from physical damage (such as severe rusting, apparent structural defects, or signs of pressurization and leakage).
- The waste containers are compatible with the waste. No evidence of incompatibility (such as bulging or corrosion) has been observed.
- The waste containers are closed and are not stored in a manner that may rupture the container or cause it to leak. No evidence of open containers or improper storage has been observed.
- The CH Bay Storage and Surge Storage Areas have a containment system that is free from cracks and gaps. Inspections confirm that the concrete floors are in good condition and meet the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.175(b)(1)).
- Inspections confirm that waste containers are elevated 6 inches to prevent potential contact with liquids.
- Secondary containment has sufficient capacity to contain 10 percent of the volume of containers presently stored in the CH Bay Storage and Surge Storage Area, as described in Attachment A1, Section A1-1f (1) of the Permit.
- Run-on into the containment system is prevented as a result of the building design. There is no evidence of run-on into the CH Bay Storage and Surge Storage Area.
- There is no evidence of spilled or leaked waste or accumulated precipitation.

The August 29, 2014, and November 3, 2014, Permittee requests for additional extensions of WHB storage time include additional information on the waste in the WHB.

On March 17, 2015, the Waste Isolation Pilot Plant Technical Assessment Team (TAT) Report, SRNL-RP-2014-01198, Rev. 0, was issued. The purpose of the TAT investigation was to determine the mechanisms and chemical reactions that may have contributed to the failure of the waste drum. The TAT concluded that one drum, Drum LA00000068660, was the source of radioactive contamination released during the February 14, 2014, radiological event at WIPP. The contents of Drum LA00000068660 were chemically incompatible, and the drum breached as a result of internal chemical reactions.

Additionally, LANL has performed an extent of condition evaluation of wastes that are derived from an initial inventory of 272 parent drums. While the result of this evaluation has identified containers from four total waste streams (LA-MHD01.001; LA-CIN01.001; LA-MIN02-V.001; and LA-MIN04-S.001) that contain nitrate salts, and has adjusted the identification of containers that contain these wastes, none of these waste containers are located in the WHB. Therefore, there is no risk identified with respect to the nitrate salt bearing wastes associated with this request.

3.0 Alternative Storage Options

3.1 Alternative Storage Option 1: Shipping the Waste to the Waste Control Specialists Facility in Andrews, Texas

Below is the inventory of waste containers in the CH Bay by generator/storage site.

- Idaho National Laboratory (INL): 32 containers (7-55G drums, 15-standard waste boxes [SWBs], 10-TDOPs) ~ 8 shipments

- LANL: 11 containers (11 SWBs) ~ 4 shipments
- Savannah River Site (SRS): 101 containers (97-55G drums [pipe overpack containers], 4 SLB2s) ~ 7 shipments
- WIPP (site-derived waste): 11 containers (11 SWBs)

There are several challenges associated with this option. First, there is a storage time limit at Waste Control Specialists (WCS) of 1 year. Some TRU waste currently in storage at WCS met this limit on April 1, 2015. Discussions are currently underway with WCS to address these storage limits. These storage time issues must be resolved prior to shipping any other waste to WCS. Second, waste must meet the WCS Waste Acceptance Criteria (WAC) to be eligible for shipment to WCS. Third, every shipment must be approved by the Texas Commission Environmental Quality (TCEQ) prior to shipment to WCS.

This option may be available for the WIPP site derived waste. A thorough evaluation of the waste against the WCS WAC must be conducted to ensure eligibility. However, because every shipment of waste to WCS must be approved by TCEQ discussions will have to be initiated to obtain authorization for future shipments.

This option is not available for all the waste currently received from generator/storage sites stored in the CH Bay at this time. Only a small quantity of the waste (two of the four SWBs of the LANL waste) received from generator/storage sites currently stored in the WHB at the WIPP facility may meet the WCS WAC and qualify for shipment to that facility without further treatment. This waste is part of the LANL 3,706 m³ waste campaign.

Waste Control Specialists has submitted an exemption request to the TCEQ regarding its license that, if approved, would allow additional waste (an additional 8 of the 19 shipments) to qualify for shipment. This consists of the INL waste. This means that at some time in the future approximately 10 of 19 shipments currently stored at the WIPP facility could become eligible for shipment to WCS, providing the waste meets the WCS WAC. However, the remaining waste (approximately seven [this consists of the SRS shipments] of 19 shipments) stored at the WIPP facility has no current or future eligibility for shipment to WCS. The TCEQ has not approved the exemption request, and it is not expected that the TCEQ will finalize a response to the exemption request prior to the May 6, 2015, deadline.

There are significant costs associated with this option, including storage, handling, and transportation.

The contract for the temporary storage of TRU mixed waste at WCS currently includes LANL, INL, and SRS wastes. Note however, only 2 of the 11 LANL containers in storage in the WHB CH Bay meet the WCS Special Nuclear Material WAC limit due to the quantity of plutonium in each container. TCEQ has instructed WCS to obtain approval for receipt of any future TRU waste shipments.

Should this option become viable, the waste containers would have to be loaded into the transportation packages before being transported to WCS. On August 8, and again on October 1, 2014, the Nuclear Regulatory Commission (NRC) was notified by the Permittees of a reportable condition pursuant to 10 CFR 71.95. This reportable condition pertained to a process change that occurred to a LANL waste stream (LA-MIN02-V.001) without prior DOE approval, resulting in a noncompliance with the NRC Certificate of Compliance No. 9218 with regard to chemical composition and compatibility requirements. The shipment of any waste stream in the

Type B packaging model Transuranic Package Transporter-II (TRUPACT-II) has been curtailed as the notification to the NRC stated that all shipments from LANL and to the WIPP have been suspended until the AIB investigations and packaging related corrective actions are complete. The Permittees are awaiting the publication of the final AIB report in order to develop appropriate packaging related corrective actions for submittal to the NRC for concurrence. Once concurrence from the NRC is received the applicable corrective actions will be implemented.

Risks to human health and the environment associated with the handling of waste containers (e.g., container drop, lid failure, puncture) and the transporting of waste in the Type B packages (e.g., releases due to a severe transportation accident), although very low, do exist. These risks were addressed in the *Waste Isolation Pilot Plant Final Disposal Phase Supplemental Environmental Impact Statement*, Chapter 5, which addresses the environmental impacts associated with the proposed action (i.e., transportation of waste from generator/storage sites to the WIPP facility for disposal). It stands to reason that keeping the waste in a stable, secure, and permitted storage facility such as the WIPP facility poses less risk to human health and the environment than transporting the waste containers to a secondary permitted storage facility. Furthermore, moving the waste to another facility does not necessarily reduce the risk associated with storage.

3.2 Alternative Storage Option 2: Returning the Waste to the Generator/Storage Sites

The issues relative to the use of NRC certified TRUPACT II shipping containers identified in Section 3.1 are applicable to this option as well. In addition, this option involves returning the waste to the three generator/storage sites (INL, LANL, and SRS) that originally shipped the waste to the WIPP facility. This option is not currently available. Due to state regulatory agreements in place for each site, negotiations will be required with the individual state regulatory agencies and state governments prior to returning waste to each generator/storage site or shipping the waste to a single DOE generator/storage site. The complexities of state-specific negotiations render it unlikely that arrangements can be made to ship the waste back to the generator/storage sites prior to the May 6, 2015, deadline. There are significant costs associated with this option, including administrative, handling, and transportation costs. Therefore, the Permittees have concluded that storing the waste at the WIPP facility until the underground is available for the resumption of disposal activities is the favored option, and it provides the least risk to human health and the environment with minimal additional cost. Alternative Storage Option 1 (Section 3.1, above) provides a description of the risks and complexities associated with the transportation of the waste containers currently in storage at the WIPP facility.

3.2.1 Returning Waste to Idaho National Laboratory

Formal agreements in place at INL make return shipments to INL very difficult. The August 29, 2014, request for extension provides an analysis of these agreements. Specifically, these agreements limit storage of off-site waste at the INL to 6 months. Furthermore, although shipments of waste to the WIPP facility have been curtailed, INL has continued to certify and stage waste pending shipment. The certified waste takes up some of the available storage capacity. Storage space for returned shipments at INL is also extremely limited. At INL, work has shifted to characterization and off-site disposal of low-level waste. Personnel must be re-directed and preparations made to receive and unload TRU mixed waste.

3.2.2 Returning Waste to Los Alamos National Laboratory

The shipment of waste in the WHB to LANL is extremely complex as describe in the August 29, 2014, request for extension. Furthermore, The LANL loading/unloading facility (RANT) is currently shut down. To resume operations, documented safety analysis work must be completed. This is unlikely to be completed prior to May 6, 2015.

The August 29, 2014, request for additional extension of storage time provides an analysis of LANL Consent Orders that impact returning shipments.

3.2.3 Returning Waste to the Savannah River Site

The SRS has suspended its TRU mixed waste shipping operations. To resume operations, significant preparations must commence. This would include mobilizing required personnel, personnel training, moving and setting up mobile loading equipment, and readiness/restart activities as directed by the DOE. There are no consent or administrative orders against SRS that preclude shipment of TRU waste from the WIPP facility, but shipping waste from New Mexico to South Carolina would be less protective of human health and the environment for the reasons stated previously in this request. Any shipment of waste back to SRS would require the approval of the South Carolina Department of Health and Environmental Control. The security profile of the SRS waste stream has changed since the waste was shipped. An examination of the ring bolt to the drum lids is required to determine if the tamper-indicating devices (TIDs) are still intact. This will require breaking down existing payloads, performing verification, then rebuilding prior to shipment.

In conclusion, the most environmentally protective option for storage of waste pending the recovery of the WIPP facility to normal operations is retention in the WHB.

3.3 Alternative Storage Option 3: Shipping the Waste to a Secondary Generator/Storage Site

3.3.1 DOE Facilities

Unlike the WIPP facility, generator/storage sites around the complex do not typically receive and store significant quantities of waste from other generator/storage sites. There are significant challenges associated with this option. Site-specific Resource Conservation and Recovery Act (RCRA) Permits (and associated WAC) may preclude returning waste to generator/storage sites and/or shipping waste to a secondary permitted storage facility or require dialog with and notifications to state regulators, permit modifications, issuance of a regulatory order, or potentially sampling and analysis, as follows:

- INL – The INL WAC requires that organic and inorganic constituents and metals must be identified and quantified. Once negotiated with the Idaho regulators, the Advance Mixed Waste Treatment Program could accept and store waste for 6 months, the facility then has 6 months to dispose. Limited storage capacity may be an issue. Long-term storage (i.e., greater than 6 months) is not a probable option.
- LANL – The LANL Permit, Section 2.2.1, has specific requirements for acceptance and storage of hazardous waste from off-site that do not include the waste streams in the WHB. Returning LANL waste in the WHB does not meet those provisions and may require a LANL Permit modification.

- SRS – The SRS Hazardous and Mixed Waste Permit, Section II.H.2, requires an order issued by the South Carolina Department of Health and Environmental Control pursuant to the Federal Facility Compliance Agreement in order to receive hazardous or mixed waste.
- Hanford Site – Waste must meet WAC and sampling and analysis plan criteria. Discussion with the waste generator is warranted to determine if any characterization beyond the existing acceptable knowledge is needed.
- Oak Ridge National Laboratory – The Oak Ridge National Laboratory has some capacity for storage of off-site waste. Approval from the Tennessee Department of Environment and Conservation is required.

3.3.2 Other Non-DOE Facilities

In order to further evaluate alternate storage of the TRU mixed waste in the WHB, the Permittees have considered three commercial radioactive waste management facilities in addition to WCS. TRU mixed waste would be sent to a commercial facility according to that facility's waste acceptance criteria for short term storage. Upon completion of the recovery efforts of the WIPP facility disposal panels, the TRU waste would be shipped back to the WIPP facility for disposal. The Permittees would supply loading and unloading at the supplier's facility. The Permittees would also supply transportation to and from the supplier's facility, subject to the limitations regarding the NRC license for TRUPACT II.

The three facilities under consideration are as follows:

- Energy Solutions Bear Creek Facility, Oak Ridge, TN
- Energy solutions Clive, Utah Facility
- Perma-Fix Environmental Services Richland, WA Facilities

Each is authorized to manage hazardous waste under a state-issued permit and to manage radioactive waste under state-issued licenses. Further investigation is needed to evaluate whether or not the TRU mixed waste in the WHB meets the specific WAC for the sites. NWP is seeking information from the commercial facility regarding the acceptability of sending TRU mixed waste for storage.

Use of commercial facilities may be a viable alternative once the approvals are obtained, however, they do not represent a better option than retaining the waste in the WHB. There are significant costs associated with this option, including administrative, handling, and transportation costs. Therefore, the Permittees have concluded that storing the waste at the WIPP facility until the underground is available for the resumption of disposal activities is the favored option, and it provides the least risk to human health and the environment with minimal additional cost. Alternative Storage Option 1 (Section 3.1, above) provides a description of the risks and complexities associated with the transportation of the waste containers currently in storage at the WIPP facility.

4.0 Option for Emplacement of Waste in the WIPP Underground

The Permittees intend to decontaminate areas in the underground including Panel 7, Rooms 1 through 6. Waste currently stored in the CH Bay would be transported underground and emplaced in an open room.

Based on the characterization of the contaminated areas in the underground, a transition zone will be established at the edge of the contamination areas in the mine in order to transfer the waste from clean equipment to contaminated equipment that will be operated for emplacement. Currently 6-ton forklifts and CH waste transporters located in Panel 7 are contaminated. A CH transporter can be used to transport waste from the Waste Shaft Station to the transition zone. Once the waste is transferred in the transition zone, a contaminated CH transporter and forklift will be used to move waste to the disposal room and complete emplacement.

Protective equipment will be required for all personnel emplacing waste in accordance with a Radiological Work Permit based on radiological survey results after the decontamination activities are completed.

Several prerequisites required for waste emplacement have already been accomplished, making this a potential option; however, the current planning requires other significant milestones to be accomplished prior to initial restart. The challenge associated with this option is the ability to complete the necessary prerequisites by May 6, 2015, well ahead of the PMB schedule. The following have been completed:

- The DOE AIB video investigations of Panel 7, Room 7 have been completed and Panel 7 has been released by the AIB.
- The waste hoist has been placed back into service.
- Several areas have been rolled back, based on radiological surveys, to controlled areas.
- Some bolting was performed for the REACH program allowing access to Panel 7

Prior to starting any waste emplacement or decontamination activities in Panel 7, it will be necessary to complete the following:

- Develop safety analysis documentation necessary for emplacement.
- Revise WP 05-WH1025 *CH Waste Downloading and Emplacement* standard operating procedure.
- On the job training and mock-up with personnel protective equipment.
- Complete ground control and bolting activities throughout waste route.
- Equipment maintenance, decontamination, combustible loading inspections and sign off by Fire Protection Engineer:
 - (2) 6-ton forklift (PMs and fire suppression system)
 - (1) 13-ton SLB-II handler forklift (PMs and fire suppression system)
 - (2) CH transporters (PMs and fire suppression system)
 - (2) Push-pull devices

- Perform required ground control in accessible areas of the underground to support a safe travel path to the disposal area.
- Develop a plan to address low ventilation (<35,000 scfm) flow while emplacing waste.

Progress in these areas is reported to the NMED regularly as required by NMED administrative orders. In addition to the waste stored on surface, this option could be used for disposal of site derived waste that is accumulated from recovery activities.

The PMB schedule currently provides for the completion of the initial closure in Panel 6 and the closure of Panel 7, Room 7, prior to any underground waste management activity. Because of the limited ventilation air in the underground, these activities would have to either be completed or put on hold to initiate waste handling activities, potentially delaying the placement of protective closures in Panel 6 and Panel 7, Room 7. Additionally, successful completion of an operational readiness review that is planned prior to initial restart would not be complete prior to this waste emplacement. Emplacement of waste prior to completion of the planned operation readiness review would require special authorization and or compensatory measures.

5.0 Current Thermography Measurements

Recent infrared (IR) thermography measurements of LANL waste currently in storage in the WHB are shown in Attachment 1. These measurements were made using a Fluke 62 Max IR, which is calibrated annually per the WIPP Instrumentation and Calibration Program. Ambient temperature readings are taken prior to obtaining readings on the containers.

Attachment 1: Recent Infrared Thermography Measurements for Waste in Storage in Waste Handling Building by Payload Number (°F)

Date	Ambient Temp.	LA140018 172	LA140021 137	LA140020 190	LA140021 147	LA140020 126	LA140021 133	LA140019 127	LA140020 156
4/10/2015	70.4	70.2	69.6	70.0	70.4	70.0	70.6	70.0	71.2
4/11/2015	70.8	70.0	69.2	69.6	70.0	70.6	70.6	70.4	71.2
4/12/2015	71.0	70.4	70.4	70.4	70.2	70.6	70.6	70.6	71.0
4/13/2015	71.0	69.8	68.2	68.2	69.6	69.6	70.0	69.8	70.0
4/14/2015	68.8	68.0	66.6	67.0	67.8	67.8	68.8	68.0	69.0