



Department of Energy
Carlsbad Field Office
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May 24, 2011

Mr. John Kieling, Acting Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Notification of a Class 1 Permit Modification to the Hazardous Waste Facility
Permit, Permit Number: NM4890139088-TSDF

Dear Mr. Kieling:

Enclosed is a Class 1 Permit Modification Notification to:

- Revise TRUPACT-III Management Language
- Revise Procedure Reference for the Bolting Station in Table E-1

We certify under penalty of law that this document and all enclosures were prepared under our direction or supervision in accordance with 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.

Please contact George T. Basabilvazo at (575) 234-7488 if you have any questions regarding this notification.

Sincerely,

Original Signatures on File

Edward Ziemianski, Acting Manager
Carlsbad Field Office

M. F. Sharif, General Manager
Washington TRU Solutions LLC

Enclosure

cc: w/enclosure
J. Davis, NMED * ED
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*ED denotes electronic distribution

Class 1 Permit Modification Notifications

**Revise TRUPACT-III Management Language
Revise Procedure Reference for the Bolting Station in Table E-1**

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

Permit #NM4890139088-TSDF

May 2011

Table of Contents

Transmittal Letter	
Table of Contents.....	i
Overview of the Permit Modification Notifications.....	1
Attachment A	A-1
Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications	A-2
Item 1	A-3
Description	A-3
Basis	A-3
Revised Permit Text.....	A-3
Item 2	A-4
Description	A-4
Basis	A-4
Revised Permit Text.....	A-5

Overview of the Permit Modification Notifications

This document contains two Class 1 Permit Modification Notifications (**PMNs**) to modify the Hazardous Waste Facility Permit (**Permit**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF hereinafter referred to as the Permit.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Washington TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with Permit Part 1.3.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations ((40 **CFR**) 270.42(a)). The PMNs in this document are necessary to notify the New Mexico Environment Department (**NMED**) of a change that impacts the WIPP facility. These changes do not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the Permit and any related supporting documents are provided in the PMNs. The proposed modifications to the text of the Permit have been identified using red text and double underline and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by italicized text.

Attachment A

Description of the Class 1 Permit Modification Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

Affected Permit Section	Change Description	Category	Attachment A Page #
Attachment A1, Section A1-1c(1)	Add text “, or manually as required,”	A.1	A-3
Attachment E, Table E-1	Change the procedure number for the bolting station inspection in Permit Attachment E, Table E-1 from WP 05-WH1209 to WP 05-WH1203.	A.1	A-4

Item 1

Description:

Revise the language in Attachment A1, "Container Storage," Section A1-1c(1) "TRUPACT-III Management" to address manual bolt removal from the TRUPACT-III overpack cover and closure lid.

Basis:

The change is classified as "Administrative and informational change" and is therefore a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion:

In order to address the manual removal of bolts from the TRUPACT-III overpack cover and closure lid, the Permittees are adding the following language to Attachment A1, Section A1-1c(1), TRUPACT-III Management "or manually as required." This change provides the flexibility to remove bolts from the TRUPACT-III overpack cover and closure lid manually when the bolting robot is not operational.

Revised Permit Text:

- TRUPACT-III Management

The TRUPACT-III containing one SLB2 will be transferred to a Yard Transfer Vehicle in the Parking Area Unit using a forklift. The Yard Transfer Vehicle then transports the TRUPACT-III into the CH Bay through one of the airlocks and into Room 108 for unloading (Figure A1-1b). The TRUPACT-III is first transported to the bolting station where the overpack cover and closure lid are removed using a bolting robot, or manually as required, and a monorail hoist. The TRUPACT-III is then moved to the payload transfer station where the SLB2 is removed from the TRUPACT-III.

Item 2

Description:

Change the procedure number for the bolting station inspection in Permit Attachment E, Table E-1 from WP 05-WH1209 to WP 05-WH1203.

Basis:

The change is classified as “Administrative and informational change” and is therefore a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, A.1).

Discussion:

This change is necessary because the inspections for the Bolting Station and Bolting Robot will be conducted using the same procedure, WP 05-WH1203. There is no change in the frequency or content of the inspection for either piece of equipment.

Revised Permit Text:

**Table E-1
Inspection Schedule/Procedures**

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Air Intake Shaft Hoist	Underground Operations	Preoperational ^c See Lists 1b and c	WP 04-HO1004 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m in accordance with Mine Safety and Health Administration (MSHA) requirements
Ambulances (Surface and Underground) and related emergency supplies and equipment	Emergency Services	Weekly See List 11	PM000030 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Required Equipment ⁿ
Adjustable Center of Gravity Lift Fixture	Waste Handling	Preoperational See List 8	WP 05-WH1410 Inspecting for Mechanical Operability ^m and Deterioration ^b
Backup Power Supply Diesel Generators	Facility Operations	Monthly See List 3	WP 04-ED1301 Inspecting for Mechanical Operability ^m and Leaks/Spills by starting and operating both generators. Results of this inspection are logged in accordance with WP 04-AD3008.
Facility Inspections (Water Diversion Berms)	Facility Engineering	Annually See List 4	WP 10-WC3008 Inspecting for Damage, Impediments to water flow, and Deterioration ^b
Central Monitoring Systems (CMS)	Facility Operations	Continuous See List 3	Automatic Self-Checking
Contact-Handled (CH) TRU Underground Transporter	Waste Handling	Preoperational See List 8	WP 05-WH1603 Inspecting for Mechanical Operability ^m , Deterioration ^b , and area around transporter clear of obstacles
Conveyance Loading Car	Waste Handling	Preoperational See List 8	WP 05-WH1406 Inspecting for Mechanical Operability ^m , Deterioration ^b , path clear of obstacles, and guards in the proper place
Facility Transfer Vehicle	Waste Handling	Preoperational See List 8	WP 05-WH1204 Inspecting for Mechanical Operability ^m , Deterioration ^b , path clear of obstacles, and guards in the proper place

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Exhaust Shaft	Underground Operations	Quarterly See List 1a	PM041099 Inspecting for Deterioration ^b and Leaks/Spills
Eye Wash and Shower Equipment	Equipment Custodian	Weekly See List 5	WP 12-IS1832 Inspecting for Deterioration ^b
		Semi-annually See List 2a	WP 12-IS1832 Inspecting for Deterioration ^b and Fluid Levels–Replace as Required
Fire Detection and Alarm System	Emergency Services	Semiannually See List 11	PM000027 Inspecting for Deterioration ^b , Operability of indicator lights and, underground fuel station dry chemical suppression system. Inspection is per NFPA 17
Fire Extinguishers ^j	Emergency Services	Monthly See List 11	PM000036 Inspecting for Deterioration ^b , Leaks/Spills, Expiration, seals, fullness, and pressure
Fire Hoses	Emergency Services	Annually (minimum) See List 11	PM000031 Inspecting for Deterioration ^b and Leaks/Spills
Fire Hydrants	Emergency Services	Semi-annual/ annually See List 11	PM000034 Inspecting for Deterioration ^b and Leaks/Spills
Fire Pumps	Emergency Services	Weekly/annually See List 11	WP 12-FP0026 Inspecting for Deterioration ^b , Leaks/Spills, valves, and panel lights
Fire Sprinkler Systems	Emergency Services	Monthly/ quarterly See List 11	WP 12-FP0025 Inspecting for Deterioration ^b , Leaks/Spills, static pressures, and removable strainers
Fire and Emergency Response Trucks (Seagrave Fire Apparatus, Emergency One Apparatus, and Underground Rescue Truck)	Emergency Services	Weekly See List 11	PM000033 Inspecting for Mechanical Operability ^m , Deterioration ^b , Leaks/Spills, and Required Equipment ⁿ
Forklifts Used for Waste Handling (Electric and Diesel forklifts, Push-Pull Attachment)	Waste Handling	Preoperational See List 8	WP 05-WH1201, WP 05-WH1207, WP 05-WH1401, WP 05-WH1402, WP 05-WH1403, and WP 05-WH1412 Inspecting for Mechanical Operability ^m , Deterioration ^b , and On board fire suppression system
Hazardous Material Response Equipment	Emergency Services	Weekly See List 11	PM000033 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Required Equipment ⁿ

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Miners First Aid Station	Emergency Services	Quarterly See List 11	PM000035 Inspecting for Required Equipment ⁿ
Mine Pager Phones (between surface and underground)	Facility Operations	Monthly See List 3	WP 04-PC3017 Testing of PA and Underground Alarms and Mine Page Phones at essential locations
MSHA Air Quality Monitor	Maintenance/ Underground Operations	Daily ^l See Lists 1 and 10	WP 12-IH1828 Inspecting for Air Quality Monitoring Equipment Functional Check
Perimeter Fence, Gates, Signs	Security	Daily See List 6	PF0-008 Inspecting for Deterioration ^b and Posted Warnings
Personal Protective Equipment (not otherwise contained in emergency vehicles or issued to individuals): —Self-Contained Breathing Apparatus	Emergency Services	Weekly See List 11	PM000029 Inspecting for Deterioration ^b and Pressure
Public Address (and Intercom System)	Facility Operations	Monthly See List 3	WP 04-PC3017 Testing of PA and Underground Alarms and Mine Page Phones at essential locations Systems operated in test mode
Radio Equipment	Facility Operations	Daily ^j See List 3	Radios are operated daily and are repaired upon failure
Rescue Truck (Surface and Underground)	Emergency Services	Weekly See List 11	PM000030 and PM000033 Inspecting for Mechanical Operability ^m , Deterioration ^b , Leaks/Spills, and Required Equipment ⁿ
Salt Handling Shaft Hoist	Underground Operations	Preoperational See List 1b and c	WP 04-HO1002 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m in accordance with MSHA requirements
Self-Rescuers	Underground Operations	Quarterly See List 1c	WP 04-AU1026 Inspecting for Deterioration ^b and Functionality in accordance with MSHA requirements
Surface TRU Mixed Waste Handling Area ^k	Waste Handling	Preoperational or Weekly ^e See List 8	WP 05-WH1101 Inspecting for Deterioration ^b , Leaks/Spills, Required Aisle Space, Posted Warnings, Communication Systems, Container Condition, and Floor coating integrity

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
TRU Mixed Waste Decontamination Equipment	Waste Handling	Annually See List 8	WP 05-WH1101 Inspecting for Required Equipment ⁿ
Underground Openings— Roof Bolts and Travelways	Underground Operations	Weekly See List 1a	WP 04-AU1007 Inspecting for Deterioration ^b
Underground— Geomechanical Instrumentation System (GIS)	Geotechnical Engineering	Monthly See List 9	WP 07-EU1301 Inspecting for Deterioration ^b
Underground TRU Mixed Waste Disposal Area	Waste Handling	Preoperational See List 8	WP 05-WH1810 Inspecting for Deterioration ^b , Leaks/Spills, mine pager phones, equipment, unobstructed access, signs, debris, and ventilation
Uninterruptible Power Supply (Central UPS)	Facility Operations	Daily See List 3	WP 04-ED1542 Inspecting for Mechanical Operability ^m and Deterioration ^b with no malfunction alarms. Results of this inspection are logged in accordance with WP 04-AD3008.
TDOP Uponder	Waste Handling	Preoperational See List 8	WP 05-WH1010 Inspecting for Mechanical Operability ^m and Deterioration ^b
Vehicle Siren	Emergency Services	Weekly See List 11	Functional Test included with inspection of the Ambulances, Fire Trucks, and Rescue Trucks
Ventilation Exhaust	Maintenance Operations	Quarterly See List 10	IC041098 Check for Deterioration ^b and Calibration of Mine Ventilation Rate Monitoring Equipment
Waste Handling Cranes	Waste Handling	Preoperational See List 8	WP 05-WH1407 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Leaks/Spills
Waste Hoist	Underground Operations	Preoperational See List 1b and c	WP 04-HO1003 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m , Leaks/Spills, in accordance with MSHA requirements
Water Tank Level	Facility Operations	Daily See List 3	SDD-WD00 Inspecting for Deterioration ^b , and water levels. Results of this inspection are logged in accordance with WP 04-AD3008.

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Push-Pull Attachment	Waste Handling	Preoperational See List 8	WP 05-WH1401 Inspecting for Damage and Deterioration ^b
Trailer Jockey	Waste Handling	Preoperational See List 8	WP 05-WH1405 Inspecting for Mechanical Operability ^m and Deterioration ^b
Explosion-Isolation Walls	Underground Operations	Quarterly See List 1	Integrity and Deterioration ^b of Accessible Areas
Bulkhead in Filled Panels	Underground Operations	Monthly See List 1	Integrity and Deterioration ^b of Accessible Areas
Bolting Robot	Waste Handling	Preoperational See List 8	WP 05-WH1203 Mechanical Operability ^m
Yard Transfer Vehicle	Waste Handling	Preoperational See List 8	WP 05-WH1205 Mechanical Operability ^m , Deterioration ^b , Path clear of obstacles and Guards in proper place
Payload Transfer Station	Waste Handling	Preoperational See List 8	WP 05-WH1208 Mechanical Operability ^m , Deterioration ^b , and Guards in proper place
Monorail Hoist	Waste Handling	Preoperational See List 8	WP 05-WH1202 Mechanical Operability ^m , Deterioration ^b , and leaks/spills
Bolting Station	Waste Handling	Preoperational See List 8	WP 05-WH1203 9 Mechanical Operability ^m , Deterioration ^b , and Guards in proper place