



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

APR 12 2018

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

Subject: Request for Extension of time to perform the Annual Recertification Audit for the Hanford Central Characterization Program at an Undetermined Time

Dear Mr. Kieling:

The purpose of this letter is to request an extension of time to perform the TRU Waste Recertification audit for the Hanford Central Characterization Program (CCP) from April 10, 2018 to a future undetermined date. An extension is permissible pursuant to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Part 1, section 1.10.3. Pursuant to permit Attachment C6, section C-63, "Audits will be conducted at least annually for each site involved in the waste characterization program." The extension, if granted, would direct that the audit be scheduled and completed on a future date.

The Hanford program is currently unfunded to perform waste characterization activities. Work at the Hanford site, which is the host site location for CCP waste characterization activities, was last performed in August of 2011. This work included Nondestructive assay (NDA) and Real Time Radiography (RTR) examination of Contact Handled (CH) waste containers and generation of batch data reports for these analyses. The overall Hanford/CCP program was deactivated in fiscal year 2012 and shipments of waste to the Waste Isolation Pilot Plant (WIPP) site were discontinued. Desktop recertification audits have been performed annually to April 26-27, 2017. The Hanford Audit A-17-20 results indicate that the Hanford/CCP operations continue to be in a state of suspension.

Due the cessation of activities at the Hanford host site location and in turn by the CCP program, the Carlsbad Field Office (CBFO) proposes to suspend the certification for the Hanford/CCP program. Once waste characterization activities resume at the Hanford host site location, the CBFO will conduct a full site specific audit as a basis for reinstating authority to perform waste characterization activities and reestablishment of waste shipments from the Hanford site to the WIPP. The audit will evaluate Hanford/CCP program updates put in place to account for reactivation of the waste characterization program and written to comply with the WIPP Hazardous Waste Facility Permit (HWFP), NM 489013088-TSDF requirements that have changed since the suspension of the Hanford/CCP program. This will focus CBFO assessment efforts on active programs and allow for evaluation of the Hanford/CCP program once updates are finalized and determined ready for implementation.

Should you have any questions concerning this notification, please contact Mr. Kenneth Princen, Assistant Manager, Office of the National TRU Program at (575) 234-7053.

Sincerely,

Signatures on File

Todd Shrader, Manager
Carlsbad Field Office

Bruce C. Covert, Project Manager
Nuclear Waste Partnership LLC

cc:

J. Carswell, CBFO	*ED
M. Brown, CBFO	ED
J. Stroble, CBFO	ED
D. Miehls, CBFO	ED
M. Navarrete, CBFO	ED
N. Castaneda, CBFO	ED
G. Birge, CBFO	ED
T. Carver, CBFO	ED
H. Cruickshank, CBFO	ED
C. Fesmire, CBFO	ED
D. Standiford, CBFO	ED
A. Stone, CBFO	ED
A. Walker, CBFO	ED
A. Farabee, DOE-RL	ED
D. DeRosa, DOE-RL	ED
V. Ballew, NWP	ED
J. Britain, NWP	ED
J. Carter, NWP	ED
J. Harvill, NWP	ED
A. Johnson, NWP	ED
R. Lee, NWP	ED
M. McDaniel, NWP	ED
B. Pace, NWP	ED
M. Percy, NWP	ED
M. Ramirez, NWP	ED
R. Reeves, NWP	ED
T. Sellmer, NWP	ED
C. Simmons, NWP	ED
D. Wade, NWP	ED
M. Valentine, NWP	ED
R. Chavez, RES	ED
J. Ellis, EPA	ED
T. Peake, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
R. Maestas, NMED	ED
M. McLean, NMED	ED
H. Tellez, NMED	ED
D. Biswell, NMED	ED
T. Runyon, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
K. Licklitter, CTAC	ED
J. Schuetz, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
RCRA Chronology Record	ED
WIPP Operating Record	ED
WWIS Database Administrators	ED
CBFO M&RC	

*ED denotes electronic distribution