



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

October 13, 2021

Mr. Ricardo Maestas, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

Subject: Request for a 45-day Extension of Storage Time for Waste Containers in Storage in the Waste Handling Building Container Storage Unit at the Waste Isolation Pilot Plant, Hazardous Waste Facility Permit Number NM4890139088-TSDF

Dear Mr. Maestas:

The purpose of this letter is to request an extension of storage time for contact-handled transuranic (CH TRU) mixed waste containers in storage in the Waste Handling Building (WHB) Container Storage Unit, CH-Bay Storage Area. Containers of TRU mixed waste from 14 shipments in the CH-Bay Storage Area are approaching the storage time limit.

Permit Part 3, Section 3.1.1.7., *CH TRU Mixed Storage Time Limit*, limits the storage of CH TRU mixed waste containers to 60 calendar days. Enclosed is a list of the TRU mixed waste containers from respective shipments that are approaching the storage time limit. Containers from waste shipment (SR210004) have the earliest time limit expiration date of October 16, 2021. Containers from three waste shipments (IN210084, LA210032, OR210021) have a storage time limit expiration date of November 1, 2021 which represents the latest storage time limit expiration date for those waste containers included in this request.

The Permittees request a 45-calendar day storage time extension until November 30, 2021 for these waste containers for the reason below:

- An issue developed in the WHB that is associated with the configuration of waste handling equipment (i.e., airlock doors) such that the Permittees are unable to download waste to the underground at this time. The equipment is important to ensure that an appropriate airflow direction is maintained in order to assure radiological containment in the event of a release.

It is anticipated that waste disposal operations will resume on October 16, 2021, which would allow waste emplacement of the containers with the earliest storage limit expiration date. However, as a precautionary measure, a storage time limit extension is being requested in case the anticipated resumption of waste disposal operations is delayed. The waste containers currently stored in the WHB pose no additional hazards to human health or the environment due to the storage time extension. This is based upon:

- Waste containers are being stored in accordance with Waste Isolation Pilot Plant (WIPP) standard operating procedures that implement the Permit requirements and WIPP safety requirements.
- The Waste Isolation Pilot Plant (WIPP) facility is permitted and secure. Storage area inspections are conducted weekly as required by the Permit.

- The Permittees have demonstrated that they can successfully store waste containers over longer storage times with no impact to human health and the environment. In the past, waste containers in the WHB have been safely stored for more than one year.
- The waste containers inside the WHB are in static storage and are in a safe configuration in a controlled environment. There are currently no active waste management activities other than inspections being performed; therefore, there is no risk of drum punctures, dropping of drums, or other incidents resulting from the active management of waste containers.
- 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 containers or cause them to leak. No evidence of open containers or improper storage has been observed.


This request is being made pursuant to Permit Part 1, Section 1.10.3., *Extension of Time*. Your timely response to this letter is appreciated.

We certify under penalty of law that this document and enclosure 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.

If you have any questions, please contact Mr. Michael R. Brown at (575) 706-0072.

Sincerely,

Signatures on File



Reinhard Knerr
 Manager
 Carlsbad Field Office



Sean Dunagan
 President and Project Manager
 Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure
 N. Barka, NMED *ED
 D. Biswell, NMED ED
 M. McLean, NMED ED
 CBFO M&RC
 *ED denotes electronic distribution

Enclosure

CH Bay Storage Unit Waste Container Inventory
Included in Request
21-0256

CH Bay Storage Unit Waste Container Inventory Included In Request

Shipment	60 Day CH Bay Permitted Storage Time Limit Deadline	Container Type	Container ID
SR210004			
	10/16/2021	1 SWB	SR21524421
	10/16/2021	1 SWB	SR509776A
OR210019			
	10/18/2021	55GD	NFS0640A
	10/18/2021	55GD	NFS0893C
	10/18/2021	55GD	NFS0897B
	10/18/2021	55GD	NFS0898B
	10/18/2021	55GD	NFS0898C
	10/18/2021	55GD	NFS0899B
	10/18/2021	55GD	X10C9311579A
	10/18/2021	55GD	NFS0643B
	10/18/2021	55GD	NFS0648B
	10/18/2021	55GD	NFS0858C
	10/18/2021	55GD	NFS0861B
	10/18/2021	55GD	NFS0885B
	10/18/2021	55GD	NFS0887C
	10/18/2021	55GD	NFSS10179497
	10/19/2021	55GD	X10C0402934L
	10/19/2021	55GD	X10C0501748A
	10/19/2021	55GD	X10C9312527B
	10/19/2021	55GD	X10C9312942A
	10/19/2021	55GD	X10C9313590A
	10/19/2021	55GD	X10C9313648A
	10/19/2021	55GD	X10C9400070A1
	10/19/2021	55GD	NFS0893B
	10/19/2021	55GD	X10C9312603A
	10/19/2021	55GD	X10C9312961E
	10/19/2021	55GD	X10C9313006B
	10/19/2021	55GD	X10C9313094A
	10/19/2021	55GD	X10C9313112A
	10/19/2021	55GD	X10C9313636A
	10/26/2021	55GD	NFS0892C
	10/26/2021	55GD	X10C9311552G
	10/26/2021	55GD	X10C9312402A1
	10/26/2021	55GD	X10C9312627A
	10/26/2021	55GD	X10C9400097A
	10/26/2021	55GD	X10C9400147A
	10/26/2021	55GD	X10C9402626E

LA210034			
	10/26/2021	55GD- POP S100	LA00000070418
	10/26/2021	55GD- POP S100	LA00000070420
	10/26/2021	55GD- POP S100	LA00000070421
	10/26/2021	55GD- POP S100	LA00000070422
	10/26/2021	55GD- POP S100	LA00000070423
	10/26/2021	55GD- POP S100	LA00000070431
	10/26/2021	55GD- POP S100	LA00000070445
	10/26/2021	55GD	LA00000066850
	10/26/2021	55GD	LA00000067220
	10/26/2021	55GD	LA00000067230
	10/26/2021	55GD	LA00000067319
	10/26/2021	55GD	LA00000067321
	10/26/2021	55GD	LA00000067407
	10/26/2021	55GD	LA00000073352
	10/26/2021	55GD	LA00000067600
	10/26/2021	55GD	LA00000070800
	10/26/2021	55GD	LA00000071023
	10/26/2021	55GD	LA00000074360
	10/26/2021	55GD	LA00000074380
	10/26/2021	55GD	LA00000074420
	10/26/2021	55GD- POP 12-in	LA00000074678
LA210031			
	10/26/2021	55GD	LA00000071281
	10/26/2021	55GD	LA00000072274
	10/26/2021	55GD	LA00000073519
	10/26/2021	55GD- POP 12-in	LA00000073877
	10/26/2021	55GD- POP 12-in	LA00000073902
	10/26/2021	55GD	LA00000074355
	10/26/2021	55GD- POP 12-in	LA00000074436
	10/26/2021	55GD	LA00000071258
	10/26/2021	55GD	LA00000073527
	10/26/2021	55GD	LA00000073641
	10/26/2021	55GD	LA00000074354
	10/26/2021	55GD	LA00000074368
	10/26/2021	55GD	LA00000074371
	10/26/2021	55GD	LA00000074732
OR210020			
	10/29/2021	55GD	NFS0859A
	10/29/2021	55GD	NFS0881C
	10/29/2021	55GD	NFS0906B
	10/29/2021	55GD	NFS0907B
	10/29/2021	55GD	NFS0908B
	10/29/2021	55GD	X10C9312576A
	10/29/2021	55GD	X10C9313593A
	10/29/2021	55GD	NFS0861C

	10/29/2021	55GD	NFS0882C
	10/29/2021	55GD	NFS0894B
	10/29/2021	55GD	NFS0903B
	10/29/2021	55GD	NFS0908A
	10/29/2021	55GD	X10C9312740A
	10/29/2021	55GD	X10C9312806A
	10/29/2021	55GD	NFS0653B
	10/29/2021	55GD	NFS0689B
	10/29/2021	55GD	NFS0856B
	10/29/2021	55GD	NFS0896C
	10/29/2021	55GD	NFS0905C
	10/29/2021	55GD	NFS0911B
	10/29/2021	55GD	X10C9309201U
	10/29/2021	55GD	NFS0640C
	10/29/2021	55GD	NFS0645B
	10/29/2021	55GD	NFS0645C
	10/29/2021	55GD	NFS0649C
	10/29/2021	55GD	NFS0884B
	10/29/2021	55GD	NFS0901A
	10/29/2021	55GD	NFSS10185726
IN210081			
	10/29/2021	100GD	BN10611990
	10/29/2021	100GD	BN10643829
	10/29/2021	100GD	BN10646925
	10/29/2021	100GD	BN10644323
	10/29/2021	100GD	BN10649629
	10/29/2021	100GD	BN10652139
LA210034			
	10/29/2021	55GD- POP S100	LA00000067578
	10/29/2021	55GD- POP S100	LA00000070409
	10/29/2021	55GD- POP S100	LA00000070410
	10/29/2021	55GD- POP S100	LA00000070411
	10/29/2021	55GD- POP S100	LA00000070412
	10/29/2021	55GD- POP S100	LA00000070414
	10/29/2021	55GD- POP S100	LA00000070415
LA210035			
	10/29/2021	55GD	LA00000072110
	10/29/2021	55GD	LA00000072199
	10/29/2021	55GD	LA00000073438
	10/29/2021	55GD	LA00000074385
	10/29/2021	55GD	LA00000074570
	10/29/2021	55GD	LA00000074709
	10/29/2021	55GD	LA00000074730
LA210031			
	10/29/2021	55GD	LA00000070946
	10/29/2021	55GD	LA00000071722
	10/29/2021	55GD	LA00000072522

	10/29/2021	55GD	LA00000072865
	10/29/2021	55GD	LA00000072873
	10/29/2021	55GD	LA00000072981
	10/29/2021	55GD	LA00000074558
	10/29/2021	55GD	LA00000069899
	10/29/2021	55GD	LA00000070803
	10/29/2021	55GD	LA00000073618
	10/29/2021	55GD	LA00000074364
	10/29/2021	55GD	LA00000074391
	10/29/2021	55GD	LA00000074402
	10/29/2021	55GD	LA00000074408
IN210082			
	10/30/2021	100GD	BN10518698
	10/30/2021	100GD	BN10633811
	10/30/2021	100GD	BN10636488
	10/30/2021	100GD	BN10250922
	10/30/2021	100GD	BN10274926
	10/30/2021	100GD	BN10637295
IN210083			
	10/31/2021	100GD	BN10273081
	10/31/2021	100GD	BN10530128
	10/31/2021	100GD	BN10617549
	10/31/2021	100GD	BN10231322
	10/31/2021	100GD	BN10248530
	10/31/2021	100GD	BN10373267
	10/31/2021	100GD	BN10624140
	10/31/2021	100GD	BN10643668
	10/31/2021	100GD	BN10651038
	10/31/2021	100GD	BN10611441
	10/31/2021	100GD	BN10618301
	10/31/2021	100GD	BN10651831
IN210084			
	11/1/2021	100GD	BN10586649
	11/1/2021	100GD	BN10595943
	11/1/2021	100GD	BN10615333
	11/1/2021	100GD	BN10604770
	11/1/2021	100GD	BN10615436
	11/1/2021	100GD	BN10651560
	11/1/2021	100GD	BN10183514
	11/1/2021	100GD	BN10501544
	11/1/2021	100GD	BN10646068
	11/1/2021	100GD	BN10517901
	11/1/2021	100GD	BN10562095
	11/1/2021	100GD	BN10591878
LA210032			
	11/1/2021	55GD- POP 12-in	LA00000072466
	11/1/2021	55GD- POP 12-in	LA00000074342

	11/1/2021	55GD- POP 12-in	LA00000074346
	11/1/2021	55GD- POP 12-in	LA00000074492
	11/1/2021	55GD- POP 12-in	LA00000074618
	11/1/2021	55GD- POP 12-in	LA00000074665
	11/1/2021	55GD- POP 12-in	LA00000074684
	11/1/2021	55GD- POP 12-in	LA00000074599
	11/1/2021	55GD- POP 12-in	LA00000074631
	11/1/2021	55GD- POP 12-in	LA00000074633
	11/1/2021	55GD- POP 12-in	LA00000074667
	11/1/2021	55GD- POP 12-in	LA00000074669
	11/1/2021	55GD- POP 12-in	LA00000074681
	11/1/2021	55GD- POP 12-in	LA00000074825
OR210021			
	11/1/2021	55GD	NFS0412E
	11/1/2021	55GD	X10C9311383A
	11/1/2021	55GD	X10C9312035A
	11/1/2021	55GD	X10C9400031A
	11/1/2021	55GD	X10CSATN01905K
	11/1/2021	55GD	X10CSATN02446A
	11/1/2021	55GD	X10CSATN03042J1
	11/1/2021	55GD	X10C1300510H
	11/1/2021	55GD	X10C9311222A
	11/1/2021	55GD	X10C9312387B
	11/1/2021	55GD	X10C9312768A
	11/1/2021	55GD	X10C9400070A2A
	11/1/2021	55GD	X10CSATN02384C
	11/1/2021	55GD	X10CSATN02521B