



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

April 25, 2023

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

Subject: Request for an Additional 180-Day Extension of Storage Time for Contact-Handled Waste Shipping Package HalfPACT 506 in Storage at the Waste Isolation Pilot Plant, Hazardous Waste Facility Permit Number NM4890139088-TSDF

- Reference:**
- 1) DOE CBFO letter 22-0267 from Reinhard Knerr, Manager, Carlsbad Field Office to Rick Shean, Chief, Hazardous Waste Bureau, dated November 22, 2022; Subject: Request for a 180-Day Extension of Storage Time for a Contact-Handled Waste Shipping Package in Storage at the Waste Isolation Pilot Plant, Hazardous Waste Facility Permit Number NM4890139088-TSDF
 - 2) NMED letter from Rick Shean, Chief, Hazardous Waste Bureau to Reinhard Knerr, Manager, Carlsbad Field Office, and Sean Dunagan, President and Project Manager, Nuclear Waste Partnership, LLC, dated November 22, 2022; Subject: Approval of Request for 180-Day Extension of Storage Time for a Contact-Handled Waste Shipping Package in Storage in the Parking Area Unit, Waste Isolation Pilot Plant EPA I.D. Number NM4890139088

Dear Mr. Cobrain:

The purpose of this letter is to request an additional extension of storage time for contact-handled transuranic (CH TRU) mixed waste shipping package HalfPACT 506 in the Parking Area Container Storage Unit (PAU). This request is pursuant to Permit Part 1, Section 1.10.3., Extension of Time.

HalfPACT 506 contains a single Standard Waste Box (SWB) (container ID number SWD12275) of TRU mixed waste from waste stream SR-SWMF-HET-A, Contaminated Debris from the Solid Waste Management Facility. The SWB was received from the Savannah River Site (SRS) in shipment SR220010. The Permittees requested a 180-day storage time extension for this container on November 22, 2022 which was approved by the New Mexico Environment Department (NMED), and extended the PAU storage time from November 23, 2022 through May 21, 2023. The NMED approval letter requested a submission date of May 1, 2023 if an additional extension of time is needed by the Permittees. Therefore, the Permittees are requesting an additional 180-days for storage of this CH TRU mixed waste shipping package for following reasons:

- On February 15, 2023, the Permittees submitted to the U.S. Nuclear Regulatory Commission (NRC) an application seeking NRC authorization to use the outer confinement assembly (OCA) of another HalfPACT unit to transport the HalfPACT 506 inner containment vessel (ICV) back to the Savannah River Site.

- On March 16, 2023, the NRC notified the Permittees the application was accepted for detailed technical review. Information contained in the letter anticipates the NRC review process being completed by May 2023. However, in their review acceptance letter, the NRC identified their technical review of the application could require the Permittees to provide additional information, and the projected review schedule could be impacted by urgent assignments, or other factors, such as adequacy of information responses.
- The NRC requested some additional information needed to assist in their review of the information previously provided to them pertaining to the request for the shipping authorization. The information is due by April 28, 2023. Therefore, barring any other requests for information, the NRC approval is not expected until sometime in May 2023.
- Once the NRC approval is received it will take some additional time to prepare and process the shipment.

The requested 180 days will extend the storage time from May 22, 2023 to November 17, 2023.

The container remains segregated and labeled in the PAU in the sealed ICV of the HalfPACT 506 shipping package pursuant to Permit Part 3, Section 3.1.2.1., and the November 22, 2022 NMED approval letter. The HalfPACT 506 shipping package has been and will continue to be inspected weekly pursuant to Permit Part 3, Section 3.7, Inspection Schedules and Procedures, during its residence under the approved storage time extension.

The waste inside the sealed ICV in HalfPACT 506 poses no additional hazards to human health or the environment due to the proposed additional storage time extension. This is based upon:

- The sealed ICV inside HalfPACT 506 has been successfully stored at Waste Isolation Pilot Plant (WIPP) since August 26, 2022 without incident.
- The ICV is a robust container of steel construction (approximately 0.375-inch American Society for Testing and Materials [ASTM] A240, type 304 stainless steel) and is sealed within the closed Outer Containment Vessel (OCV). The HalfPACT shipping package is an NRC-licensed Type B package which has successfully completed rigorous container integrity tests. There is no potential for release of hazardous waste or hazardous waste constituents from these closed vessels.
- The ICV is being stored in accordance with WIPP standard operating procedures that implement the Permit requirements (e.g., inspections, security) and WIPP safety requirements.
- The Permittees have determined the gas generation rate of the waste inside the sealed ICV to be extremely low and calculated the next venting date to be years in the future.
- The WIPP facility is permitted and secure. TRU mixed waste storage area inspections are conducted weekly as required by the Permit.
- The Permittees have demonstrated that they can successfully store waste containers over extended storage times with no impact to human health and the environment. In the past (due to the 2014 radiological event), waste containers were stored safely at the WIPP facility for up to approximately three years.

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.

If you have any questions, please contact Mr. Michael R. Gerle at (575) 988-5372.

Sincerely,

Signatures on File

Mark Bollinger
Acting Manager
Carlsbad Field Office

Ken Harrawood
Program Manager
Salado Isolation Mining Contractors

cc:

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