



Department of Energy

Carlsbad Field Office
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NOV 03 2014

Mr. John E. Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87508-6303

Mr. Tom Blaine, Division Director
Environmental Health Division
Harold Runnels Building
1190 Saint Francis Drive, Room 4050
Santa Fe, NM 87502-5469

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 September 10, 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 Mr. Blaine:

In accordance with the above-referenced letter, 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) facility. The TRU mixed waste in storage originated from 19 shipments and from the replacement of filters in the Underground Ventilation Filtration System.

On September 30, 2014, Revision 0 of the WIPP Recovery Plan was issued. The schedule described in the plan contains a step-wise process to return to normal operations. The WIPP Recovery Plan provides the series of recovery actions needed to be taken and the approximate time that is planned for each action. Section 4 of the plan, *Conclusions*, identifies the schedule for commencing waste emplacement operations as the first quarter of calendar year 2016.

As stated in prior requests for extension of time, none of the Los Alamos National Laboratory (LANL) waste currently in WHB storage is from the LA-MIN02-V.001 waste stream. On September 30, 2014, LANL issued a letter to Ryan Flynn of the NMED (*Response to the August 26, 2014 Request for Information, Treatment of Waste without a Permit and Failure to Reevaluate Acceptable Knowledge, Los Alamos National Laboratory*). Attachment 2, *Remediation Documentation for Nitrate Salt-Bearing Waste Containers-Los Alamos National Laboratory, LA-UR-14-27477*, of the letter contains a table that is the result of a LANL evaluation of the parent and daughter drums resulting from the management of nitrate-salt bearing waste. The table identifies 707 un-remediated and remediated containers and their current locations. None of these containers are located in the WIPP Waste Handling Building. This information provides additional justification that continued storage of CH TRU mixed waste in the WHB is safe and protective of human health and the environment.

On August 29, 2014, in the previous request for an additional extension of storage time, the Permittees provided a thorough evaluation of the topics listed below. This was provided pursuant to the NMED's July 14, 2014 letter.

- Potential impacts to human health and the environment
- Alternative storage options

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- Return of waste to generator sites
- Options for emplacement of waste in the WIPP underground
- Description of current thermography measurements

Since the August 29, 2014, letter, there has been no new information regarding the above topics.

Based on the information above, the Permittees request an extension of storage time for CH TRU mixed waste stored in the WIPP Waste Handling Building until the end of the first quarter of calendar year 2016 (i.e., March 30, 2016).

We certify under penalty of law that this document and all attachments 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.

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

Sincerely,

Original Signature on File

~~Jose R. Franco~~, Manager
Carlsbad Field Office

Robert L. McQuinn, Project Manager
Nuclear Waste Partnership LLC

cc:

- | | |
|-------------------|-----|
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