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MAR 04 2020

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Sean Dunagan, Project Manager
Nuclear Waste Partnership LLC
P.O. Box 2078
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**RE: APPROVAL OF REQUEST FOR EXTENSION OF TIME TO COMPLETE HAZARDOUS WASTE FACILITY PERMIT
INSPECTIONS DURING A PLANNED ELECTRICAL OUTAGE
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Sosson and Dunagan:

The New Mexico Environment Department ("NMED") received the Department of Energy's ("DOE") and Nuclear Waste Partnership's ("NWP") (collectively, the "Permittees") Request for Extension of Time ("Request"), dated March 3, 2020, for completion of certain inspections specified in the Hazardous Waste Facility Permit ("Permit") at the Waste Isolation Pilot Plant ("WIPP"). The Request was submitted pursuant to Permit Part 1, Section 1.10.3, *Extension of Time* which states:

"The Permittees may seek an extension of time in which to perform a requirement of this Permit, for good cause, by sending a written request for extension of time and proposed revised schedule to the Secretary. The request shall state the length of the requested extension and describe the basis for the request. The Secretary will respond in writing to any request for extension following receipt of the request. If the Secretary denies the request for extension, reasons for the denial will be stated."

The Permittees submitted the Request specific to the condition in Permit Part 2, Section 2.7.3, *Inspection Frequency*, which requires that monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment be inspected at the frequency specified in Permit Attachment E, *Inspection Schedule, Process and Forms*.

Messrs. Sosson and Dunagan

The Permittees provided the following explanation of need in their Request: "As part of the ongoing maintenance outage, which started on February 14, 2020, there is a planned main electrical outage scheduled for March 9 – 13, 2020 (Monday – Friday). During this time, due to safety concerns, there will be restrictions to the number of personnel allowed at the WIPP facility. It is anticipated the WIPP facility will return to normal operating status late in the afternoon of March 14, 2020 (Saturday)." The Permittees are requesting a 7-day time extension for these inspections for the following reasons: 1) Qualified personnel responsible for performing the inspections will not be able to access the equipment/system due to the electrical outage; and 2) No personnel will be allowed underground during the electrical outage.

NMED hereby grants the Request for an extension of time until March 16, 2020 for the following Permit-required inspections, as listed in Table 1 of the Request: 1) Uninterruptible Power Supply (Central UPS) daily inspections; 2) MSHA Air Quality Monitor daily inspections; 3) Eye Wash and Shower Equipment weekly inspection; 4) Fire Pumps weekly inspection; and 5) Underground Openings-Roof Bolts and Travelways weekly inspection. NMED requests that the Permittees capture this extension of time approval on the appropriate inspection sheets. If the facility does not return to normal operations by this date, and the referenced inspections or any other Permit-required inspections are not completed, the Permittees will submit another Request for an extension of time along with a proposed revised schedule for NMED review.

If you have any questions regarding this matter, please contact Ricardo Maestas at (505) 476-6050.

Sincerely,



Kevin Pierard
Chief
Hazardous Waste Bureau

cc: R. Maestas, NMED HWB
D. Biswell, NMED HWB
M. McLean, NMED HWB
C. Catechis, NMED DOE/OB
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File: WIPP '20