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


Dear Mr. Kieling and Mr. Blaine:


The purpose of this letter is to provide the NMED with additional supplemental information collected since the report was filed. This information has been obtained as a result of the continuing investigations into the cause of the February 14, 2014 radiological event.

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,

Jose R. Fraricó, Manager
Carlsbad Field Office

Robert L. McQuinn, Project Manager
Nuclear Waste Partnership LLC

Enclosure 1

cc:
T. Kliphuis, NMED *ED
CBFO M&RC
*ED denotes electronic distribution


Investigations relative to the cause of the February 14, 2014, radiological event have been ongoing since the time of these reports. The information provided below is an additional supplement to the information provided in the previous reports. Some of this information was reported to the NMED on July 25, 2014.

The name and quantity of material(s) involved

As previously reported, based upon the recent entries into the area and videos that were taken of the affected area, the Permittees have identified the drum that was damaged as LA00000068660 from Los Alamos National Laboratory (LANL) waste stream LA-MIN02-V.001. This is a waste stream that contains nitrate salts. The EPA hazardous waste numbers associated with these containers that were provided by the generator at the time of characterization, and included in the approved waste stream profile form are D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, and F005.

Because the video investigations show evidence of a thermal reaction in drum LA00000068660, LANL and the Permittees have initiated investigations to determine if the subject transuranic (TRU) mixed waste container or other containers from waste stream LA-MIN02-V.001 should be assigned an additional EPA hazardous waste number, such as the characteristic of ignitability (D001). Pending receipt of additional information, the Permittees have determined that the subject waste appears to have exhibited the characteristic of ignitability (D001) after disposal in the Waste Isolation Pilot Plant (WIPP) underground. Therefore, the Permittees believe the EPA Hazardous Waste Number D001 should be applied to up to 368 containers (this includes drum LA00000068660) from LANL waste stream LA-MIN02-V.001 that have been disposed of in Panel 6, Rooms 1 and 2 and Panel 7, Room 7 in the underground WIPP facility (Panel 6, Room 1 (222 containers); Panel 6, Room 2 (91 containers); and Panel 7, Room 7 (55 containers)). Continuing investigation and analysis by both the Permittees and LANL may provide additional
information concerning the waste stream. The WIPP Permit Part 2, Section 2.3.3.7 specifies that wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA Hazardous Waste Numbers of D001, D002, or D003) are not acceptable at the WIPP facility.

An assessment of actual or potential hazards to human health or the environment, where this is applicable

On May 2, 2014, the Permittees suspended the authorization for certification of certain waste streams, including LA-MIN02-V.001. This halted shipment of additional containers of these wastes from LANL. This action was taken to protect human health and the environment. On May 20, 2014, the NMED ordered the Permittees to prepare and submit for approval a plan to isolate the disposed nitrate bearing salt waste by closing Panel 6 and Panel 7, Room 7, in order to protect human health and the environment. The Permittees responded to the Order by preparing the WIPP Nitrate Salt Bearing Waste Isolation Plan, which was submitted to the NMED on May 30, 2014. The Permittees plan on leaving these wastes in place and implementing the WIPP Nitrate Salt Bearing Waste Isolation Plan. The Permittees are implementing the initial closure portion of this plan which was approved by the NMED on August 5, 2014, to expedite closure of Panel 6 and Panel 7.