

AUG 30 2019



Department of Energy

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

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Report of Implementation of the *Resource Conservation and Recovery Act Contingency Plan* at the Waste Isolation Pilot Plant Facility on August 20, 2019, Hazardous Waste Facility Permit, Number NM 4890139088-TSDF

Dear Mr. Kieling:

The purpose of this letter is to provide you with the enclosed subject report pursuant to Permit Attachment D, Section D-5, Required Reporting.

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 regarding this notification, please call Mr. Michael R. Brown at (575) 234-7476.

Sincerely,

Signatures on File

Kirk D. Lachman, Acting Manager
Carlsbad Field Office

Bruce C. Covert, Project Manager
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure

R. Maestas, NMED *ED

D. Biswell, NMED ED

M. McLean, NMED ED

CBFO M&RC

*ED denotes electronic distribution

**Report of Implementation of the
Resource Conservation and Recovery
Act
Contingency Plan
at the Waste Isolation Pilot Plant**

August 20, 2019

Report of Implementation of the RCRA Contingency Plan at the Waste Isolation Pilot Plant Facility (EPA I.D. Number NM4890139088) on August 20, 2019

The purpose of this report is to satisfy the requirement in the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (Permit) Attachment D, *RCRA Contingency Plan*, Section D-5, *Required Reporting*, to submit a written report of the incident to the Secretary of the New Mexico Environment Department and to the U.S. Environmental Protection Agency Region VI Administrator within 15 days of implementing the *RCRA Contingency Plan*. The information required to be included in the report is provided below.

- The name, address, and telephone number of the Owner/Operator

United States Department of Energy, the owner and operator of the WIPP facility,
and Nuclear Waste Partnership LLC (NWP), co-operator of the WIPP facility
P.O. Box 3090
34 Louis Whitlock Road
Carlsbad, NM 88221
(575) 234-7300

- The name, address, and telephone number of the facility

Waste Isolation Pilot Plant
P.O. Box 3090
34 Louis Whitlock Road
Carlsbad, NM 88221
(800) 336-9477

- The date, time, and type of incident (e.g., fire, explosion or release)

- On August 20, 2019, at approximately 0900, the WIPP *RCRA Contingency Plan* was implemented as a precautionary measure while the operating staff investigated the condition of a Standard Waste Box (SWB) in the Contact-Handled (CH) Bay of the Waste Handling Building Container Storage Unit. Verbal notification of implementation of the *RCRA Contingency Plan* was provided to the NMED on August 20, 2019. The SWB (Container Identification Number PADTEMP9A) was from the Savannah River Site. It was received at the WIPP facility in shipment number SR190002 which was unloaded from the respective TRUPACT-II shipping container on August 19, 2019. Upon removing the SWB from the TRUPACT-II shipping container, the sides and lid appeared to have an outward deflection as compared to a typical SWB. Personnel from the Packaging Implementation and Technical Support group inspected the container and indicated the container integrity had not been compromised. Because the deflection could be an indication of internal pressurization of the SWB the following precautionary measures were taken:
 - Waste handling activities in the affected area were suspended at approximately 0912 on August 19, 2019.
 - Work activities were placed in a safe configuration, and personnel evacuated the CH Bay.
 - The container was moved into the Shielded Storage Room on August 22, 2019 for further assessment.

- The SWB was packaged (direct-loaded) at the Savannah River Site in 2013 and contains debris waste. There were two SWBs in the TRUPACT-II, and the one in question was on the bottom. Radioactive contamination was not detected on either of the SWBs or inside the TRUPACT-II.
- Because the condition represented a potential for a fire, explosion, or release of hazardous waste or hazardous waste constituents, the *RCRA Contingency Plan* was implemented on August 20, 2019 at approximately 0900 pursuant to the first paragraph in Permit Attachment D, Section D-3 *Criteria for Implementation of the RCRA Contingency Plan*.

The provisions of the RCRA Contingency Plan shall be implemented immediately whenever there is a fire, an explosion, or a release of hazardous wastes or hazardous waste constituents that could threaten human health or the environment, or whenever the potential for such an event exists as determined by the RCRA Emergency Coordinator, as required under 20.4.1.500 NMAC (incorporating 40 CFR §264.51(b)).

- The name and quantity of material(s) involved
 - One direct loaded SWB (PADTEMP9A) with an internal volume of 1.88 cubic meters. The waste inside is S5000-debris waste from Savannah River Site waste stream SR-W027-773A-HET, consisting of metals, plastics, cellulose, and rubber, with no gas generating materials.
- The extent of injuries, if any
 - No injuries resulted from the SWB waste handling activities.
- An assessment of actual or potential hazards to human health or the environment, where this is applicable
 - There were no actual or potential hazards to human health or the environment. As a precautionary measure, personnel were evacuated from the CH Bay and personnel access to the CH Bay was restricted until WIPP facility senior management authorized re-entry into the CH Bay.
- The estimated quantity and disposition of recovered material that resulted from the incident
 - No materials required recovery or disposition.
- Any additional information/comments
 - A Response Plan was subsequently developed regarding the SWB. Phase 1 of the Response Plan defined actions necessary to safely move the SWB to the Shielded Storage Room in the CH Bay. Phase 2 of the Response Plan involves collecting and evaluating additional information in order to determine the appropriate actions for disposition of the SWB, and to restore the process areas to normal functions.