



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

April 22, 2022

Mr. Rick Shean, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

Subject: Report of Implementation of the *Resource Conservation and Recovery Act Contingency Plan* at the Waste Isolation Pilot Plant Facility on April 9, 2022, Hazardous Waste Facility Permit, Number NM4890139088-TSDF

Dear Mr. Shean:

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 enclosure 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. Ed Garza at (575) 234-8368.

Sincerely,
Signatures on File

Reinhard Knerr
Manager
Carlsbad Field Office

Sean Dunagan
President and 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**

April 9, 2022

Report of Implementation of the RCRA Contingency Plan at the Waste Isolation Pilot Plant Facility (EPA I.D. Number NM4890139088) on April 9, 2022

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 New Mexico Environment Department 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)
 - This incident did not involve a fire, explosion, or release to the environment. The WIPP *RCRA Contingency Plan* was implemented as a precautionary measure based on the following information.

On April 9, 2022 (Saturday), at approximately 1856 hours, the WIPP *RCRA Contingency Plan* was implemented as a precautionary measure to address potentially degraded contact-handled (CH) waste containers (100-gallon drums) received from Idaho National Laboratory (INL) in TRUPACT-II #148.

- Verbal notification of implementation of the WIPP *RCRA Contingency Plan* was provided to the NMED on April 9, 2022, at approximately 1915 hours. The NMED was notified that a small quantity of liquids was observed after removing the payload from TRUPACT-II #148. The NMED was provided with status updates on April 11 – 15 and on April 18, 2022.
- Actions taken:
 - Radiological Control Technicians performed surface radiological surveys of the TRUPACT-II inner containment vessel (ICV) and the 100-gallon container with the observable liquid. The surveys identified radiological contamination.
 - The containers were placed in a safe configuration by placing the payload back into the open TRUPACT-II #148, and personnel were evacuated.

- Waste Handling activities were suspended at the WIPP facility on April 9, 2022.
 - Waste shipments from INL waste stream BN510.4 were subsequently suspended.
 - A contamination control barrier was placed over the open TRUPACT-II #148 and respective payload on April 12, 2022.
- Although there has been no fire, explosion or a release of hazardous waste or hazardous waste constituents to the environment, the WIPP *RCRA Contingency Plan* was implemented as a precautionary measure, pursuant to the first paragraph in Permit Attachment D, Section D-3, *Criteria for Implementation of the RCRA Contingency Plan*, which states the following:

“If, prior to waste emplacement, one or more containers of TRU mixed waste has spilled or been breached due to dropping, puncturing, container failure or degradation, or any other physical or chemical means, resulting in a release.”
- The name and quantity of material(s) involved
 - The RCRA Contingency Plan was implemented due to the observation of a small quantity of liquid identified in the inside bottom of the TRUPACT-II shipping package and on some payload containers. Some drops of liquid were also observed on the floor near the TRUPACT-II. The liquid was observed after the payload was removed from the TRUPACT-II. The payload was placed back into the TRUPACT-II and personnel were evacuated.

The 100-gallon drums contain waste from INL TRU mixed waste stream BN510.4, Supercompacted Debris Waste. The waste containers were received in shipment number IN220023. The following are the payload container ID numbers:

 - BN10619348
 - BN10630856
 - BN10643084
 - BN10630853
 - BN10630937
 - BN10631012
- The extent of injuries, if any
 - No injuries resulted.
- An assessment of actual or potential hazards to human health or the environment, where this is applicable
 - Because there was no fire, explosion, or release of hazardous waste or hazardous waste constituents to the environment there were no actual or potential hazards to assess.

- The estimated quantity and disposition of recovered material that resulted from the incident
 - Because there was no fire, explosion, or release of hazardous waste or hazardous waste constituents to the environment, there were no materials that required recovery or disposition.
- Any additional information/comments
 - The drops of liquid identified on the floor near the TRUPACT-II were surveyed and found to be radiologically contaminated. The area where the drops were identified has been decontaminated. Confirmation samples to demonstrate decontamination effectiveness have been taken and are being analyzed for hazardous constituents pursuant the Permit Attachment A1, Section A1-1d(2).
 - There was no airborne contamination identified.
 - Planning is underway to address the observed liquid and affected containers.