



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
September 6, 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 August 23, 2022,  
Hazardous Waste Facility Permit, Number NM 4890139088-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. Michael Gerle at (575) 988-5372.

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 on  
August 23, 2022**

**4 pages**

**Report of Implementation of the *Resource Conservation and Recovery Act Contingency Plan* at the Waste Isolation Pilot Plant Facility (EPA I.D. Number NM4890139088) on August 23, 2022**

This report satisfies 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 (NMED) 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)

TRUPACT-II #186

- This incident did not involve a fire, explosion, or release to the environment. The WIPP *RCRA Contingency Plan* was implemented as a precautionary measure.

On August 23, 2022 (Tuesday), at approximately 1620 hours, the WIPP *RCRA Contingency Plan* was implemented as a precautionary measure due to the identification of an oily substance on top of the reinforcement plate, on top of the payload inside of the TRUPACT-II. This indicated potentially degraded contact-handled (CH) waste containers (six 100-gallon drums) received from Idaho National Laboratory (INL) in TRUPACT-II #186. The oily brown liquid drops observed on the TRUPACT-II #186 top reinforcement plate were subsequently identified as oil drops from an Adjustable Center of Gravity Lift Fixture at the INL facility.

- Verbal notification of implementation of the WIPP *RCRA Contingency Plan* was provided to the NMED on August 23, 2022, at approximately 1630 hours. The NMED was notified that a small quantity of unknown brown liquid was observed on top of the reinforcement plate after removing the TRUPACT-II #186 Inner Containment Vessel (ICV) lid.

- Actions taken:
  - Radiological Control Technicians performed radiological surveys of the underside of the TRUPACT-II ICV lid and radiological surveys of the top of the payload (reinforcement plate). The radiological surveys identified there was no radiological contamination.
  - TRUPACT-II #186 was placed in a safe configuration by lowering the ICV lid back onto the TRUPACT-II, and personnel were evacuated from the CH Bay.
  - Waste handling activities were suspended at the WIPP facility on August 23, 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 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.*

#### TRUPACT-II #206

- The WIPP *RCRA Contingency Plan* was also implemented due to a threaded filter vent missing on a Standard Waste Box (SWB). Although there was no sign of pressurization or radiological contamination, the WIPP *RCRA Contingency Plan* was implemented as a precautionary measure.
- On August 9, 2022, TRUPACT-II #206 was received at the WIPP facility from Los Alamos National Laboratory (LANL). Processing of the TRUPACT-II was initiated and completed on August 13, 2022. No abnormal conditions for the TRUPACT-II or the payload were noted.
- On August 15, 2022, at approximately 2345 hours, it was identified that a SWB in storage in the CH Bay was missing a threaded filter vent.
- On August 23, 2022, at approximately 1620 hours, the WIPP *RCRA Contingency Plan* was implemented as a precautionary measure to ensure the safe handling of the SWB container until the threaded filter vent could be mechanically tightened to the proper torque.
- Verbal notification of implementation of the WIPP *RCRA Contingency Plan* was provided to the NMED on August 23, 2022, at approximately 1630 hours. The NMED was notified that a SWB unloaded from TRUPACT-II #206 was identified to be missing a threaded filter vent.

- Actions taken:
  - A threaded filter vent was discovered in the CH Bay. It was radiologically surveyed and found not to be contaminated. The threaded filter vent was then immediately hand-tightened back into the SWB (Container Number LA00000074293) by Waste Handling Operations personnel to achieve a safe configuration.
- 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 Permit Attachment D, Section D-3, *Criteria for Implementation of the RCRA Contingency Plan*, which states the following:

*There may be situations which do not readily lend themselves to an immediate assessment of the possible hazards to human health and the environment. In these cases, the RCRA Emergency Coordinator will implement the RCRA Contingency Plan as a precautionary measure, regardless of the emergency situation or occurrence, if the RCRA Emergency Coordinator has reason to believe that a fire, explosion, or release of hazardous waste or hazardous waste constituents has occurred that could threaten human health or the environment.*

- The name and quantity of material(s) involved

#### TRUPACT-II #186

- The WIPP *RCRA Contingency Plan* was implemented due to the observation of a small quantity of an oily substance identified on top of the reinforcement plate, on top of the payload inside of TRUPACT-II #186.

TRUPACT-II #186 contains six 100-gallon drum waste containers with waste from INL transuranic (TRU) mixed waste stream BN510.4, Supercompacted Debris Waste. The waste containers were received in shipment number IN220094 on August 5, 2022. The following are the payload container identification numbers:

- BN10620618
  - BN10618234
  - BN10617946
  - BN10635780
  - BN10618239
  - BN10617547
- There was no radiological airborne or surface contamination identified for the TRUPACT-II or in the CH Bay area.

#### TRUPACT-II #206

- The RCRA Contingency Plan was implemented due to the observation of a SWB missing a threaded filter vent.

- The SWB, container number LA00000074293, was received in TRUPACT-II #206 from LANL. The SWB contained waste from TRU mixed waste stream LA-CIN01.001, Cemented Sludge Waste. The SWB was received in shipment number LA220038 on August 9, 2022.
  - There was no radiological airborne or surface contamination identified for the TRUPACT-II or in the CH Bay area.
- 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
  - Evaluations indicated that there were no pressurization issues associated with the SWB.
  - Based upon the results of the above evaluations, the Permittees terminated implementation of the WIPP *RCRA Contingency Plan* on August 26, 2022.