



Department of Energy

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

January 15, 2019

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

Subject: Notification of Planned Change to the Permitted Facility Regarding the New Fire Water Distribution System, Hazardous Waste Facility Permit, Number: NM4890139088-TSDF

Dear Mr. Kieling:

The purpose of this letter is to provide notification to the New Mexico Environment Department (NMED) of a planned change to the permitted facility in accordance with Permit Part 1, Section 1.7.11. (20.4.1.900 New Mexico Administrative Code incorporating Title 40 of the Code of Federal Regulations §270.30(l)). The U.S. Department of Energy and Nuclear Waste Partnership LLC, collectively referred to as the Permittees, intend to upgrade the WIPP facility by installing the New Fire Water Distribution System (FWDS). The drawings of the existing FWDS were provided in the Permittees' Part B Permit Application and is broadly described in Permit Part 2, Section 2.10.1.4., and Permit Attachment D, Table D-2 and Figure D-5.

The planned upgrade to the FWDS will be conducted in four phases:

- Phase 1 includes the installation of a new water service connection from the City of Carlsbad main water line, installation of two new fire-water tanks, construction of a new fire pump house, installation of new fire-water pumps, and construction of the north section of the new fire-water main outer loop. In addition, a portion of the Property Protection Area (PPA) security fence will be temporarily relocated to accommodate construction activities (i.e., allow initial construction activities to occur outside the PPA). The temporary fence will be constructed to meet the Permit requirements for security and posting in Permit Part 2, Section 2.6.
- Phase 2 includes the installation of piping to complete the fire-water main outer loop. In addition, a portion of the PPA security fence will be permanently moved to include the completed construction. The fence will be constructed to meet the Permit requirements for security and posting in Permit Part 2, Section 2.6.
- Phase 3 includes the installation of branch connections to various areas of the WIPP facility to provide service to individual buildings. After branch connections to the buildings are connected to the new pump house, obsolete fire-water equipment will be removed from the existing pump house (Building 456) and dispositioned. The existing pump house will then be used only for domestic water purposes.

- Phase 4 includes installation of a new communications network as well as installation of new fire alarm panels within the various buildings on site. This phase of the project may cause some disruption to the existing fire alarm panels; however, each fire alarm panel (and its associated appurtenances) will be fully tested to ensure its operability.

The Permittees will ensure compensatory measures are established when a disruption to the FWDS is necessary. At the end of each phase, the Permittees will test the equipment to assure the Permit requirements for flow and volume are met and then commission the new equipment. The enclosed document provides a conceptual drawing of the new FWDS.

The Permittees anticipate that the upgrade to the FWDS will start in calendar year 2019 and conclude in calendar year 2021 and that Permit modifications will be necessary to address the upgrade to the FWDS. Upon completion of each phase of the project, the Permittees will provide the NMED a letter with a New Mexico registered professional engineer's statement that the FWDS and associated appurtenances have been modified in compliance with the Permit and provide the NMED the opportunity to inspect the modified portion of the facility pursuant to Permit Part 1, Section 1.7.11.

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, please contact Mr. Michael R. Brown at (575) 234-7476.

Sincerely,

Signatures on file

Todd Shrader, 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