

**Annual Change Report 2010/2011**

**From July 1, 2010, to June 30, 2011**

**August 30, 2011**

Prepared for:

**The Department of Energy**

Prepared by:

**WTS Regulatory Compliance**

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## Introduction

As part of continuing compliance, the U.S. Environmental Protection Agency (EPA) requires the U.S. Department of Energy (DOE) to provide information on any change in conditions or activities pertaining to the disposal system since the most recent compliance application. This requirement is identified in Title 40 Code of Federal Regulations (CFR), Section 194.4(b)(4), which states:

“No later than six months after the administrator issues a certification, and at least annually thereafter, the Department shall report to the Administrator, in writing, any changes in conditions or activities pertaining to the disposal system that were not required to be reported by paragraph (b)(3) of this section and that differ from information contained in the most recent compliance application.”

In meeting the requirement, the DOE provides an annual report each November of all applicable changes under the above requirement. This annual report informs the EPA of changes to information in the most recent compliance application (the 2009 Compliance Recertification Application (CRA)). Significant planned changes must be reported to the EPA prior to implementation by the DOE. In addition, Title 40 CFR, Section 194.4(b)(3) requires that significant unplanned changes be reported to the EPA within 24 hours or ten days, depending on the severity of the activity or condition. Planned changes are submitted on an individual basis. All other changes are reported annually.

Changes in activities or conditions are reviewed to determine if 40 CFR Section 194.4(b)(3) reporting is necessary. The enclosed tables list those items identified for reporting under 40 CFR Section 194.4(b)(4). The majority of the items described in this report are inspections, reports, and modifications to written plans and procedures for Waste Isolation Pilot Plant (WIPP) operations.

This report captures the summary of each change within seven tables for the period July 1, 2010 through June 30, 2011:

Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4) documents EPA and DOE interactions during the reporting period with a one or two sentence description of each correspondence.

Table 2: Procedure Revision Table documents changes to relevant plans and procedures during the reporting period.

Table 3: Waste Emplacement Summary Report documents the Transuranic (TRU) waste inventory for the waste parameters. The summary provides the total emplaced inventory in the repository as of June 30, 2011.

Table 4: Performance Assessment, Software, and Hardware Changes documents the changes to relevant codes, software, and hardware that have occurred during the current reporting period.

Table 5: Passive Institutional Controls Activity documents the relevant activities that would be applicable to the development of Passive Institutional Controls (PICs). This table has been added in compliance with the EPA revised PICs schedule. (Reyes to Moody, March 7, 2008)

Table 6: EPA Waste Characterization Inspections – January 2008 to June 2011 documents inspections performed by the EPA pertaining to Tier 1 changes to the baseline approvals at all generator and disposal sites for transuranic waste. This table was added to the Annual Change Report at the request of the EPA during the EPA/DOE management meeting held July 29, 2010. Inspections prior to January 2008 were documented in Table CARD 8-1 *EPA Waste Characterization Inspections* submitted with the five year recertification applications. (EPA request, July 29, 2010).

Table 7: EPA Quality Assurance Audits by Site – January 2008 to June 2011 documents audits performed by the EPA at all generator and disposal sites for transuranic waste disposal. This table was added to the Annual Change Report at the request of the EPA during the EPA/DOE management meeting held July 29, 2010. Audits prior to January 2008 were documented in Table CARD 8-2 *EPA Quality Assurance Audits by Site* submitted with the five year recertification applications. (EPA request, July 29, 2010).

In accordance with EPA requests and feedback, this report incorporates many of the suggestions and guidance for capturing the appropriate level of detail and the layout of information with respect to the WIPP certification criteria. This report does not include editorial changes, reformatting, correcting the title of references, correcting inconsistency within a procedure, and other changes to procedures that do not change the substance or intent of the procedure.

**Table 1:**  
**Changes in WIPP Conditions or Activities Reportable under**  
**Title 40 CFR Section 194.4(b)(4)**

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.4(b)(3) Conditions of Compliance Certification	Planned Change Request (PCR)	<p><u>DOE to EPA September 08, 2010</u>. Provided additional information regarding Type A testing of shielded containers as it relates to the planned change request submitted November 2007.</p> <p><u>DOE to EPA November 10, 2010</u>. Provided response to comments regarding the Type A testing of the shielded containers.</p> <p><u>DOE to EPA December 3, 2010</u>. Provided a summary of the revised Safety Impact Analysis for the Shielded Container Assembly.</p> <p><u>EPA to DOE March 25, 2011</u>. EPA announced a proposed decision to approve the Planned Change Request for the Shielded Container Assembly. This announcement opened the 60-day public comment period.</p>
194.4(b)(4) Conditions of Compliance Certification	Annual Change Report	<u>EPA to DOE February 1, 2011</u> . EPA completed a review of the 2009/2010 Annual Change Report and found it to be adequate.
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Waste Acceptance Criteria (WAC)	<u>EPA to DOE December 15, 2010</u> . EPA provided comments for changes to the WAC resulting from recent changes in the Hazardous Waste Facility Permit (Permit).
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Advanced Mixed Waste Treatment Project (AMWTP)	<u>EPA to DOE March 16, 2011</u> . EPA performed an unannounced inspection of the waste characterization program for contact-handled (CH) TRU waste at AMWTP and confirmed that CH TRU waste characterization was consistent with the conditions and limitations set forth in the baseline approval. (EPA Docket No. A-98-49; II-A4-143).

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP <sup>1</sup>	Argonne National Laboratory (ANL)	<p><u>DOE to EPA July 29, 2010</u>. Tier 1 request to add 30 gallon containers to the certification of the ANL Central Characterization Project (CCP) Remote-Handled (RH) waste stream AERHDM.</p> <p><u>EPA to DOE September 9, 2010</u>. Approval of K-Wing waste containers for disposal under waste stream AERHDM. EPA Docket No. A-98-49; II-A4-132.</p> <p><u>EPA to DOE September 28, 2010</u>. Approval of additional 120 RH containers to the AERHDM waste stream for disposal. EPA Docket No. A-98-49; II-A4-134.</p> <p><u>EPA to DOE November 22, 2010</u>. EPA approved the addition of 30 gallon containers of Fuel Examination Waste (FEW) to waste stream AERHDM. Docket No. A-98-49; II-A4-140.</p>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Baseline Inspection – Bettis Atomic Power Laboratory (BAPL)	<p><u>DOE to EPA March 9, 2011</u>. DOE provided BAPL-CCP documents.</p> <p><u>EPA to DOE March 30, 2011</u>. EPA notified the DOE of the scope of the EPA’s baseline inspection (EPA-BAPL-CCP-RH-04-11.8) of the BAPL-CCP.</p>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Baseline Inspection – Hanford-CCP	<p><u>DOE to EPA July 14, 2010</u>. Response to concern (Hanford-CCP-CH-RTR-10-001) generated during the baseline inspection of the Hanford-CCP.</p> <p><u>DOE to EPA October 6, 2010</u>. DOE provided comments on the proposed approval of the CCP TRU waste characterization baseline program at Hanford. Docket No. EPA-HQ-OAR-2010-0711.</p> <p><u>DOE to EPA October 25, 2010</u>. DOE provided additional information requested by the EPA pertaining to comments on the baseline inspection report for CCP at Hanford.</p> <p><u>EPA to DOE December 21, 2010</u>. EPA approved CH TRU waste characterization activities implemented by Hanford-CCP. (EPA Docket No. A-98-49; II-A4-138)</p>

<sup>1</sup> Tier 1 and Tier 2 activities will be identified under Section 194.8 at the request of the EPA during a meeting held on December 3, 2009.

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Hanford-CCP	<p><u>DOE to EPA January 28, 2011.</u> Tier 1 request to add the Super High Efficiency Neutron Counter Assembly (SHENCA) to the Hanford baseline.</p> <p><u>DOE to EPA April 5, 2011.</u> Tier 1 request to add the S3000 summary category group to the Hanford-CCP CH certification.</p> <p><u>EPA to DOE April 14, 2011.</u> On March 22-23, 2011, the EPA evaluated the use of High Energy Real-Time Radiography (HE RTR) equipment and procedures at Hanford-CCP as a Tier 2 request and found no issues.</p> <p><u>EPA to DOE May 2, 2011.</u> EPA conducted an on-site Tier 1 evaluation of the Hanford-CCP SHENCA equipment and procedures on March 22-23, 2011 and found no issues. (Docket No. A-98-49; II-A4-146)</p>

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
<p>194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP</p>	<p>Idaho National Laboratory (INL)</p>	<p><u>EPA to DOE August 17, 2010.</u> Approval of the third RH waste stream (ID-INTEC-RH) (EPA Docket No. A-98-49; II-A4-129) at INL for disposal at WIPP. The first two waste streams were approved February 1, 2010. (EPA Docket No. A-98-49; II-A4-122).</p> <p><u>EPA to DOE August 23, 2010.</u> Approval of Lot 1B waste stream ID-HFEF-S5400-RH for disposal at WIPP (EPA Docket No. A-98-49; II-A4-131). The OSPREY™ system is a La<sub>3</sub>Br(Ce) detector with a Canberra Osprey™ Universal MCA detector.</p> <p><u>EPA to DOE November 1, 2010.</u> EPA approved the addition of four RH TRU waste containers of Test Reactor Area (TRA) sludge from waste stream ID-RTC-S3000 for disposal at WIPP. Docket No. A-98-49; II-A4-137.</p> <p><u>EPA to DOE November 1, 2010.</u> EPA approved RH TRU waste stream IN-ID-NRF-153 (Naval Reactors Facility) for disposal at WIPP. Docket No. A-98-49; II-A4-135.</p> <p><u>DOE to EPA January 31, 2011.</u> Tier 1 request for the addition of waste stream ID-HFEF-S5400-RH (Hot Fuel Examination Facility).</p> <p><u>EPA to DOE March 16, 2011.</u> EPA performed a continued compliance inspection of the INL-CCP CH and RH TRU waste characterization program and found it to be consistent with the conditions and limitations set forth in the baseline approval. (EPA Docket No. A-98-49; II-A4-142).</p> <p><u>EPA to DOE March 23, 2011.</u> EPA approved the DOE Tier 1 request for the addition of three lot 4A canister liners to the RH TRU waste stream ID-HFEF-S5400-RH. (EPA Docket No. A-98-49; II-A4-145).</p> <p><u>DOE to EPA May 18, 2011.</u> Tier 1 request for approval of the Waste Assay Gamma System (WAGS) Calibration, Confirmation and Verification report.</p> <p><u>DOE to EPA June 14, 2011.</u> Provided documentation to support the Tier 1 request for approval of the WAGS Calibration, Confirmation and Verification report.</p> <p><u>EPA to DOE June 27, 2011.</u> EPA approved the use of supplemental calibration when assaying certain types of CH TRU waste using the WAGS at INL-CCP. (EPA Docket No. A-98-49; II-A4-150).</p>

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Los Alamos National Laboratory (LANL)	<p><u>EPA to DOE November 8, 2010</u>. EPA requested additional information for the Tier 1 request to extend the calibration range of the High Efficiency Neutron Counter (HENC) No. 2 Nondestructive Assay (NDA) system at LANL. Docket No. A-98-49; II-A4-139.</p> <p><u>EPA to DOE February 9, 2011</u>. EPA performed a continued compliance inspection for LANL-CCP waste characterization program for CH TRU waste and found it to be consistent with the conditions and limitations set forth in the baseline approval. (EPA Air Docket No. A-98-49; II-A4-141).</p>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Oak Ridge National Laboratory (ORNL)	<p><u>DOE to EPA July 8, 2010</u>. Tier1 request to include 15 additional containers to waste stream OR-NFS-CH-SOIL summary category group S4000.</p> <p><u>DOE to EPA February 15, 2011</u>. Revised Tier 1 request to include 2 instead of 15 additional containers to the SCG S4000 waste stream at ORNL-CCP.</p> <p><u>EPA to DOE March 23, 2011</u>. EPA approved the DOE Tier 1 request for the addition of waste containers from the Nuclear Fuel Services (NFS) burial trench soils (S4000) to waste stream OR-NFS-CH-SOIL. (EPA Docket No. A-98-49; II-A4-144).</p> <p><u>DOE to EPA April 19, 2011</u>. Tier 1 request to include the S3000 Summary Category Group to the ORNL-CCP certification.</p> <p><u>DOE to EPA June 23, 2011</u>. Withdrawal of the Tier 1 request for the addition of the S3000 summary category group at the ORNL-CCP.</p>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Sandia National Laboratory (SNL)	<p><u>EPA to DOE May 5, 2011</u>. EPA notified DOE of the scope of the RH TRU baseline inspection (EPA-SNL-CCP-RH-06-11.8) of the SNL-CCP. The baseline inspection is scheduled for June 6-9, 2011.</p> <p><u>DOE to EPA May 11, 2011</u>. DOE provided site program documents for the SNL-CCP baseline inspection.</p>

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Battelle Columbus Laboratory (BCL)-Savannah River Site (SRS) CCP	<p><u>EPA to DOE September 9, 2010.</u> Approval of disposal of six RH waste streams from BCL:</p> <ul style="list-style-type: none"> <li>• SR-BCLDP.001.001</li> <li>• SR-BCLDP.001.002</li> <li>• SR-BCLDP.002</li> <li>• SR-BCLDP.003</li> <li>• SR-BCLDP.004.002</li> <li>• SR-BCLDP.004.003</li> </ul> <p>EPA Docket No. A-98-49; II-A4-130.</p> <p><u>EPA to DOE October 1, 2010.</u> EPA concurred with the extension of the calibration range of the Nondestructive Assay Box Counter (NABC) and the addition of three RH waste streams from BCL. Docket No.'s A-98-49; II-A4-133 and A-98-49; II-A4-129.</p> <p><u>DOE to EPA March 30, 2011.</u> DOE submitted a Tier 1 request to add one 55-gallon container to waste stream SR-RL-BCLDP.002 to the certification of SRS-CCP RH.</p> <p><u>EPA to DOE June 8, 2011.</u> EPA approved the disposal of one 55-gallon container (BC0148) at WIPP. (EPA Docket No. A-98-49; II-A4-149).</p>

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	SRS CCP	<p><u>DOE to EPA July 8, 2010.</u> Tier 1 request to extend calibration range to the SRS NABC.</p> <p><u>EPA to DOE September 14, 2010.</u> Approval of Tier 1 request to extend the calibration range of the Box Segmented Gamma System aspect of the NABC to 7.18 grams of <sup>238</sup>Pu utilizing reduced 20-minute assay time. (EPA Docket No. A-98-49; II-A4-133).</p> <p><u>DOE to EPA January 25, 2011.</u> DOE provided the calibration document “<i>Operating Range Extension of the Box Segmented Gamma Scanner at the Savannah River Site to 40-Gram Heat Source Mass Loadings</i>”, to support the extension of the plutonium-238 operating range of the NABC.</p> <p><u>EPA to DOE April 7, 2011.</u> EPA performed a Tier 2 on-site evaluation of the High Energy Large Container Real-Time Radiography (LCRTR) equipment and procedures at SRS and found no issues.</p> <p><u>EPA to DOE May 31, 2011.</u> EPA conducted a desk top evaluation of DOE’s Tier 1 request to approve the extension of the operating range of the NABC and found no issues. (EPA Docket No. A-98-49; II-A4-148).</p>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Tier 2 Fiscal Year (FY) 10 Second Quarter	<p><u>EPA to DOE July 21, 2010.</u> Approval of the FY10 Second Quarter Tier 2 changes with additional supporting information requested for AMWTP, GEVNC-CCP, INL-CCP, LANL-CCP and ORNL-CCP.</p> <p><u>DOE to EPA July 29, 2010.</u> Submittal of additional supporting information requested on July 21, 2010.</p>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Tier 2 FY 10 Third Quarter	<p><u>DOE to EPA July 28, 2010.</u> Notification of Tier 2 changes for AMWTP, ANL-CCP, GEVNC-CCP, INL-CCP, LANL-CCP, ORNL-CCP and SRS-CCP for FY10 Third Quarter.</p> <p><u>EPA to DOE November 10, 2010.</u> EPA did not object to any of the Tier 2 changes reported for FY10 third quarter.</p> <p><u>DOE to EPA December 16, 2010.</u> Notification of FY10 third quarter Tier 2 report.</p>

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Tier 2 FY10 Fourth Quarter	<p><u>DOE to EPA October 21, 2010</u>. Notification of Tier 2 changes for AMWTP and CCP activities at ANL, GEVNC, INL, LANL, ORNL, and SRS for FY10 Fourth Quarter.</p> <p><u>EPA to DOE November 10, 2010</u>. EPA did not object to any of the changes reported in the Tier 2 changes for FY10 third and fourth quarters.</p> <p><u>DOE to EPA December 16, 2010</u>. Notification of FY10 fourth quarter Tier 2 report.</p>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Tier 2 FY 11 First Quarter	<p><u>DOE to EPA January 28, 2011</u>. Notification of Tier 2 changes for AMWTP and CCP activities at LANL, GEVNC, Hanford, INL, ORNL and SRS for FY11 first quarter.</p> <p><u>EPA to DOE March 30, 2011</u>. The EPA did not object to any of the Tier 2 changes made during FY 11 first quarter. EPA requested additional information for AMWTP Tier 2 changes.</p> <p><u>DOE to EPA April 29, 2011</u>. Additional information pertaining to the Tier 2 changes made for the first quarter of FY 11 was sent to EPA.</p>
194.8 Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP	Tier 2 FY 11 Second Quarter	<p><u>DOE to EPA May 26, 2011</u>. Notification of Tier 2 changes for AMWTP and CCP Activities at ANL, Hanford, INL, LANL, ORNL, and SRS for FY11 Second Quarter.</p>
194.12 Submission of Compliance Applications	Conversion to Electronic Format	<p><u>DOE to EPA July 16, 2010</u>. Notification of the conversion of the “Waste Isolation Pilot Plant Public Docket Documents” to electronic format at the Carlsbad, New Mexico Public Library.</p>

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.14(b) Design of the Disposal System	Status of Experiments in the WIPP Underground	<p><u>SEGA (Segmented Enriched Germanium Assembly) and MEGA (Multiple Element Germanium Array)</u></p> <p>No change</p> <p><u>EXO (Enriched Xenon Observatory)</u></p> <p>Collaborators completed filling the detector with liquid enriched xenon and began data-taking mode.</p> <p><u>LBRE (Low Background Radiation Experiment)</u></p> <p>No change.</p> <p><u>DMTPC (Dark Matter Time Projection Chamber)</u></p> <p>No change.</p>
194.21 Inspections	Annual EPA Subpart- A Inspection	<p><u>EPA to DOE October 22, 2010.</u> EPA performed their annual inspection of WIPP’s waste management and storage operations, emplacement, and monitoring program and found that WIPP complies with the requirements of 40 CFR Part 191 Subpart A and the 1998 Certification Decision. Docket No. A-98-49; II-B3-112.</p>
194.24 Waste Characterization	RH TRU Waste Characterization Program Implementation Plan (WCPIP)	<p><u>DOE to EPA December 1, 2010.</u> Notification of Revision 2 of the RH TRU WCPIP, DOE/WIPP-02-3214.</p> <p><u>EPA to DOE December 16, 2010.</u> Notification of concurrence of Revision 2 of the RH TRU WCPIP.</p>

**Table 1: Changes in WIPP Conditions or Activities Reportable under Title 40 CFR Section 194.4(b)(4)**

<b>Regulatory Requirements</b>	<b>Implementing Document or Activity that Changed</b>	<b>Description of the Change and DOE Assessment of the Impact of the Change</b>
194.32 Performance Assessment	Certification Change Notice-code change	<u>DOE to EPA November 23, 2010</u> . Notification that the existing performance assessment baseline computer code “(Fracture Matrix-Transport)” is being replaced by code EQ3/6.
194.43 Passive Institutional Controls	Extension Request to testing schedule.	<u>DOE to EPA July 28, 2010</u> . Request for extension to the Passive Institutional Controls testing schedule outlined in EPA’s letter dated March 7, 2008. Request is due to international efforts to establish standards for geologic repositories.

**Table 2:**  
**Procedure Revision Table**

**Table 2: Procedure Revision Table**

Procedure	Rev. & Effective Date	Description
WP 05-WH1011, CH Waste Handling	Rev. 38, July 8, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Clarification in the Precautions and Limitations that the Radiological Assessment Filter can be placed in the housing at any time prior to placing on TRUPACT.</li> <li>• Radiological posting requirements are to be determined by dose rates obtained during the 30 centimeters procedure.</li> <li>• Steps 2.3.15, 2.4.26, 2.5.1, 2.5.6, 2.5.8 and 2.5.29 have been clarified in order to provide direction to the Radiological Control Technician.</li> <li>• Step 2.5.11 has been changed to clarify that entry into the abnormal operations procedure is required for a damaged payload assembly for the purpose of completing actions related to a potentially non compliant container.</li> <li>• Words related to survey results above 200mrem/hour have been deleted.</li> </ul>
WP 05-WH1700, Horizontal Emplacement and Retrieval Equipment Assembly	Rev. 8, July 12, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Field Revision to move Surveillance Data Sheet information from Section 4.0 and created new Section 22.0 for this information.</li> </ul>
WP 12-ER4903, Radiological Event Response	Rev. 14, July 19, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Added step 4.3 under <i>4.0 Subsequent Actions</i> for clarification.</li> </ul>
WP 07-EU1001, Geologic and Fracture Mapping of Facility Horizon Drifts	Rev. 3, July 21, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Added information to the Introduction on the two types of geologic mapping performed at WIPP, added Stratigraphy Data Spreadsheet, moved the last 4 steps up in the document, and added clarification.</li> </ul>
WP 02-EM1025, Construction of the Potentiometric Surface Map for the Annual Site Environmental Report and Shallow Subsurface Water	Rev. 2, August 3, 2010	Complete method update to allow Environmental Monitoring and Hydrology personnel to construct potentiometric maps, if needed, in place of Sandia National Laboratory.

**Table 2: Procedure Revision Table**

<b>Procedure</b>	<b>Rev. &amp; Effective Date</b>	<b>Description</b>
WP 05-WH1011, CH Waste Handling	Rev. 39, August 31, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Addition of a bullet to the Precautions and Limitations pertaining to cycling of the vacuum valve.</li> <li>• Addition of dose rate measurements to Step 2.5.25 and to Attachment 1 under Performance, Step 2.5.25.</li> </ul>
WP 05-WH1710, 72-B RH Processing	Rev. 21, September 1, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Addition of new second bullet under Precautions and Limitations for adequate communication between Waste Handling Technician and Radiological Control Technician and following the procedure to be sure no steps are bypassed.</li> </ul>
WP 05-WH1700, Horizontal Emplacement and Retrieval Equipment Assembly	Rev. 9, September 10, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Addition of bullet to Precautions and Limitations referencing Administrative Control Override (ACO) Key.</li> <li>• Addition of wording to Step 1.3 on location of AFA in proximity to counter bore.</li> <li>• Deleted Steps 7.3, first bullet of 7.5, 7.13, 7.14, 7.15, 7.16, 8.2 and 17.1.</li> <li>• Addition of Steps 17.18 (Grapple Operation) and 21.4 (Secure Equipment Power).</li> </ul>
WP 02-EM1006, Serial and Final Sample Collection	Rev. 7, September 15, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Changes to accommodate new models of equipment and instructions.</li> </ul>
WP 02-EM1002, Electric Submersible Pump Monitoring System Installation and Operation	Rev. 4, September 21, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Removal of Steps 1.0 and 2.0 from Prerequisite Actions.</li> <li>• Addition of Step 2.13 to connect transducer.</li> <li>• Updated Steps 5.12 through 5.12.9 for changing media storage source from CD to hard drive.</li> <li>• Eliminated specific record disposition instructions and directed user to the Records Inventory and Disposition Schedule (RIDS) for the disposition instructions.</li> </ul>

**Table 2: Procedure Revision Table**

Procedure	Rev. & Effective Date	Description
WP 02-EM 1005, Groundwater Serial Sample Analysis	Rev. 6, September 21, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Upgraded instrumentation and methods.</li> <li>• Included provision for equivalent instrumentation, chemicals and reagents.</li> <li>• Upgraded chemicals, standards and reagents to commercially prepared and certified.</li> <li>• Updated references for instrumentation and methods.</li> <li>• Removed Attachment 12, Dilution Tables.</li> </ul>
SP 13-4, Logging and Management of Cuttings and Other Rock Samples at the Surface	Rev. 0, November 15, 2010	This procedure describes the processes that guide the collection, description, and (as appropriate) preservation of geologic samples and data by Sandia National Laboratories-Carlsbad Programs Group (SNL-CPG) personnel or contractors during, or in conjunction with, drilling of borehoels from the surface.
WP 08-NT.06, Waste Data System (WDS) Software Requirements Specification	Rev. 7, December 29, 2010	This revision includes: <ul style="list-style-type: none"> <li>• Added items to summarize functionality that has been added to the system for transportation reports, database, business reports, and report builder.</li> <li>• Section 5.2 revised to describe site programs and descriptions.</li> <li>• Section 5.3.3 revised to describe software interfaces.</li> </ul>
WP 12-9, WIPP Emergency Management Program	Rev. 32, January 10, 2011	Added: <ul style="list-style-type: none"> <li>• A provision for performance of a Baseline Needs Assessment (section 12.1).</li> <li>• A new subsection to describe the Continuity of Operations Plan (section 12.4).</li> </ul>
WP 05-WH1744, Surface RH Transuranic Mixed Waste Handling Area Inspections	Rev. 12, January 25, 2011	Removed the following bullets from the Precautions and Limitations Section as they pertain to the 10-160B cask: <ul style="list-style-type: none"> <li>• Use of flammable compressed gas cylinders when unbolting a lid from the 10-160B cask.</li> <li>• Storage limits in the hot cell.</li> <li>• Maximum number of drums in the hot cell.</li> <li>• Facility canisters shall not exceed three high.</li> <li>• Facility canisters shall not exceed three high in the hot cell.</li> </ul>

**Table 2: Procedure Revision Table**

Procedure	Rev. & Effective Date	Description
WP 02-EM1007, Anion and Cation Analysis	Rev. 2, March 3, 2011	This revision includes: <ul style="list-style-type: none"> <li>• Upgraded instrumentation, methods, and included provisions for equivalent use of chemicals, reagents and instrumentation.</li> <li>• Added Quality Control samples to analyses listed in procedure.</li> <li>• Included formulas for calculations and explanation of anion-cation balance and checking correctness of analyses.</li> </ul>
WP 05-WH1709, RH-TRU 72-B Trailer Unloading	Rev. 14, April 8, 2011	This revision includes miscellaneous changes to comply with new Documented Safety Analysis (DSA) updates.
SP 9-7, WIPP Well Water-Level Monitoring	Rev. 5, April 11, 2011	This revision was to remove forms from the procedure and modify some of the criteria for the surface checks and at depth checks for WIPP monitoring wells.
WP 08-NT.04, Waste Data System Configuration Management and Software Quality Assurance Program	Rev. 18, May 3, 2011	This revision includes: <ul style="list-style-type: none"> <li>• Added a paragraph in Section 1.0 to summarize development of WDS functional requirements and design implementation using the Software Requirement Specification (SRS) and Software Implementation Description (SID).</li> <li>• Added two new subsections in Section 2.0 for Test Manager (2.7) and the Tester (2.8).</li> <li>• Added two new subsections in Section 2.8 and 2.9 to describe functions performed by the test manager and personnel who perform software testing.</li> <li>• Added two bullets to include TRUPACT-III Evaluation Software and TRUPACT-III Maintenance Application to Section 3.3.6.5.</li> </ul>
WP 08-NT.05, Waste Data System Software Verification and Validation Plan	Rev. 10, May 3, 2011	This revision includes: <ul style="list-style-type: none"> <li>• Complete rewrite of Section 4.0 Life Cycle Verification and Validation.</li> </ul>

**Table 2: Procedure Revision Table**

<b>Procedure</b>	<b>Rev. &amp; Effective Date</b>	<b>Description</b>
WP 02-EM1021, Pressure Density Survey	Rev. 8, June 6, 2011	<p>This revision includes changes made in response to comments from EPA during their annual inspection.</p> <ul style="list-style-type: none"><li>• Deleted last bullet and added new final bullet regarding data entry and check printing in PRECAUTIONS section.</li><li>• Switched the order of steps in sections 1.1 and 1.2, deleted 1.6, 1.23, 1.25, 2.1 sections and the note above 1.10 and added a new section 1.9.</li></ul>

**Table 3:**  
**Waste Emplacement Summary Report**

**Table 3: Waste Emplacement Summary Report**

TRU Waste Inventory				
	Reporting Period <sup>1</sup> Emplaced Container Volume (m <sup>3</sup> )		Cumulative <sup>2</sup> Emplaced Container Volume (m <sup>3</sup> )	
RH TRU	61		252	
CH TRU	7,156		75,683	
Waste Components Inventory				
	Reporting Period <sup>1</sup> Emplaced Mass (kg)	Cumulative <sup>2</sup> Emplaced Mass (kg)	Maximum Emplacement Limiting Value <sup>3</sup> (kg)	Percent of Limiting Value <sup>3</sup> Emplaced
Cellulose, Plastic, Rubber Materials <sup>4</sup>	562,519	7,757,991	22,000,000	35.26%
	Reporting Period <sup>1</sup> Emplaced Mass (kg)	Cumulative <sup>2</sup> Emplaced Mass (kg)	Minimum Emplacement Limiting Value <sup>3</sup> (kg)	Percent of Limiting Value <sup>3</sup> Emplaced
Fe-Metals <sup>5</sup>	2,406,355	22,766,174	20,000,000	Minimum met
Non-Fe Metals	28,283	351,275	2,000	Minimum met
Residual Liquids	Liquid waste is prohibited at WIPP. The total residual liquid in any payload container shall not exceed one percent by volume of that payload container.			
Emplaced Radiological Activity Inventory (curies)				
Radionuclide	Cumulative Activity in FY 2009/2010 Annual Change Report <sup>6</sup>	CH Repository Cumulative Activity <sup>6</sup> as of June 30, 2011	RH Repository Cumulative Activity <sup>6</sup> as of June 30, 2011	Total Activity as of June 30, 2011 <sup>6</sup>
<sup>241</sup> Am	2.023E+05	2.187E+05	2.639E+02	2.190E+05
<sup>137</sup> Cs	1.759E+03	7.481E+00	3.652E+03	3.659E+03
<sup>238</sup> Pu	2.725E+05	3.468E+05	2.376E+02	3.470E+05
<sup>239</sup> Pu	2.914E+05	3.038E+05	1.350E+02	3.039E+05
<sup>240</sup> Pu	7.112E+04	7.453E+04	1.168E+02	7.465E+04
<sup>242</sup> Pu	1.450E+01	1.883E+01	1.729E-01	1.900E+01
<sup>90</sup> Sr	1.373E+03	1.479E+01	2.630E+03	2.645E+03
<sup>233</sup> U	4.839E+00	5.869E+00	1.636E-01	6.033E+00
<sup>234</sup> U	4.638E+01	6.349E+01	3.660E-01	6.386E+01
<sup>238</sup> U	1.191E+01	1.413E+01	1.423E-02	1.415E+01
<b>Total</b>	<b>8.406E+05</b>	<b>9.440E+05</b>	<b>7.036E+03</b>	<b>9.510E+05</b>

**Table 3: Waste Emplacement Summary Report**

<b>MgO<sup>7</sup> and Cellulose, Plastic &amp; Rubber (CPR) Mass Emplaced Per Waste Panel</b>	<b>Panel</b>	<b>Room</b>	<b>MgO (kg)</b>	<b>CPR* (kg)</b>	<b>Excess Factor</b>
	1	all	4,482,355	1,237,732	1.87 <sup>8</sup>
	2	2-7	5,972,300	1,241,928	2.26 <sup>8</sup>
	2	1	691,515	186,200	1.71
	3	7	960,120	104,831	4.03
	3	6	954,405	228,033	1.95
	3	5	1,022,985	284,651	1.70
	3	4	960,120	255,054	1.79
	3	3	931,545	243,860	1.89
	3	2	944,880	227,889	2.03
	3	1	662,940	183,072	1.76
	4	7	942,975	248,903	1.90
	4	6	925,830	267,494	1.71
	4	5	946,785	265,295	1.71
	4	4	1,013,460	290,608	1.70
	4	3	1,015,365	285,755	1.70
	4	2	931,545	374,327	1.22 <sup>7</sup>
	4	1	668,655	265,884	1.23
	5	7	937,260	353,262	1.28
	5	6	875,477	140,009	**2.85
	5	5	782,346	298,808	1.24
	5	4	737,167	225,425	**1.64
	5	3	714,286	215,937	**1.61
	5	2	730,612	194,045	**1.84
	5	1	459,864	129,369	*1.73
	6	7	0	2,262	*0.00
	6	6	0	0	*0.00

  

1. Reporting Period includes emplacement that occurred between July 1, 2010, and June 30, 2011.
2. Cumulative period includes emplacement from the beginning until June 30, 2011.
3. Limiting Value—Values from CRA 2009 Section 24. These values are based on inventory assumptions.
4. Cellulose, Plastic, Rubber Materials (CPR) includes CPR within the waste, container materials and emplacement materials.
5. Fe-Metals include both materials in the waste and containers in total.
6. There is no decay correction for the listed isotope activities.
7. New minimum value for excess factor of MgO to be implemented as approved by EPA (February 11, 2008) reduces excess factor from 1.67 to 1.20 and ensures minimum reactivity of 94%.
8. MgO, CPR and Excess Factor results for all of panel 1 and rooms 2-7 of panel 2 have been recalculated to replace averaged data with actual emplaced data.

\* These are active emplacement rooms which will not have all the required MgO emplaced until both Contact Handled and Remote Handled waste emplacement has been completed.

\*\*Excess factor for MgO high due to low levels of CPR in emplaced waste and the practice of placing one sack of MgO on each waste stack.

### **Table 3: Waste Emplacement Summary Report**

**Note**

Waste emplacement is a three step process. The first step is emplacement of RH waste into the walls of the emplacement room. The second step involves CH waste emplacement into the room. The third step involves emplacement of MgO onto the waste stacks and the calculations of the MgO excess factor.

**Table 4:**  
**Performance Assessment, Software, and Hardware Changes**

Table 4: Performance Assessment, Software, and Hardware Changes

<b>WIPP Use Codes/Software and Code Version</b>	<b>Version Date</b>	<b>Description</b>
CCDFGF 6.00	10/5/10	Removed the dose functionality and added functionality for configuration of waste panels. New code version is CCDFGF 7.00.
GREPOS 1.43	10/5/10	Sandia Engineering Analysis Code Access System (SEACAS) utility code qualified to support JAS3D and SANTOS for use in WIPP PA (initial qualification).

**Table 5:**  
**Passive Institutional Controls Activity**

**Table 5: Passive Institutional Controls Activity**

<b>DATE</b>	<b>Description of Activity</b>
July 28, 2010	Submitted letter to EPA requesting an extension to the EPA Passive Institutional Controls schedule of March 7, 2008 due to international efforts to establish guidance for permanent markers and record archives.

**Table 6:**  
**EPA Waste Characterization Inspections – January 2008 to June 2011**

**Table 6: EPA Waste Characterization Inspections – January 2008 to June 2011**

<b>Date of Inspection</b>	<b>EPA Inspection No./Tier 1 Evaluation</b>	<b>Site</b>	<b>Docket Number/Approval Date</b>
<b>Advanced Mixed Waste Treatment Plant (AMWTP)/Accelerated Retrieval Project (ARP)</b>			
March 2, 2010 Desk top evaluation	Tier 1 evaluation adding BN-510 waste stream	<b>AMWTP/ARP</b>	EPA Docket No. A-98-49; II-14-127, June 10, 2010
EPA Inspection (desk top)	TBD		Inspection performed in October, final report pending.
November 17-18, 2010	EPA unannounced continued compliance inspection		EPA Docket No. A-98-49; II-A4-143
<b>Argonne National Laboratory-Illinois (ANL)</b>			
May 28, 2008	Tier 1 RH Visual Examination (VE) Newly packaged waste	<b>ANL</b>	EPA Docket No. A-98-49; II-A4-102, July 10, 2008
May 20-21, 2010 Desk top evaluation	Tier 1 addition of 30 containers to AERHDM waste stream		EPA Docket No. A-98-49; II-A4-132, September 13, 2010
June 29, 2010 Desk top evaluation	Tier 1 addition of 120 containers to AERHDM waste stream		EPA Docket No. A-98-49; II-A4-134, September 28, 2010
EPA Inspection May 4 & 18, 2010	Tier 1 addition of 30-gallon containers of FEW to previously approved RH debris AERHDM waste stream		EPA Docket No. A-98-49; II-A4-140, November 22, 2010
<b>Bettis Atomic Power Laboratory (BAPL)</b>			
None to report		<b>BAPL</b>	
<b>General Electric Vallecitos Nuclear Center (GEVNC)</b>			
December 2-4, 2008	RH Initial Certification	<b>GEVNC</b>	EPA Docket No. A-98-49; II-A4-115, August 26, 2009

**Table 6: EPA Waste Characterization Inspections – January 2008 to June 2011**

<b>Date of Inspection</b>	<b>EPA Inspection No./Tier 1 Evaluation</b>	<b>Site</b>	<b>Docket Number/Approval Date</b>
<b>Hanford</b>			
April 27-29, 2010	CH Baseline Inspection	<b>Hanford</b>	EPA Docket No. A-98-49; II-A4-138, December 21, 2010
<b>Idaho National Laboratory (INL)</b>			
June 9, 2008 Desk top evaluation	Tier 1 WAGS density range extension	<b>INL</b>	EPA Docket No. A-98-49; II-A4-107, October 7, 2008
December 9-11, 2008	Tier 1 addition of VE CH S5000 retrievably stored waste stream		EPA Docket No. A-98-49; II-A4-110, March 4, 2009
December 8-9, 2009	Tier 1 addition of ID-HFEF-S5400-RH Lot 1A and ID-ANLE-S5000 waste streams		EPA Docket No. A-98-49; II-A4-122, February 1, 2010
April-May 2010 Desk top evaluation	Tier 1 addition of ID-MFC-S5400-RH waste stream		EPA Docket No. A-98-49; II-A4-126, June 11, 2010
December 8-9, 2009, January 12-13, 2010, and February 17, 2010	Tier 1 addition of ID-INTEC-RH waste stream		EPA Docket No. A-98-49; II-A4-130, August 17, 2010
July 13, 2010 to June 2010 Desk top evaluation	Tier 1 addition of Osprey and ID-HFEF-S5400-RH Lot 1B waste stream		EPA Docket No. A-98-49; II-A4-131, August 23, 2010
July 1, 2009 Desk top evaluation	Tier 1 HENC operating range extension		EPA Docket No. A-98-49; II-A4-119, September 22, 2010
August 30-September 1, 2010	Tier 1 addition of ID-RTC-S3000 waste stream		EPA Docket No. A-98-49; II-A4-137, November 1, 2010
August 9-10, 2010	Tier 1 addition of		EPA Docket No. A-98-49; II-A4-135, November 1, 2010

**Table 6: EPA Waste Characterization Inspections – January 2008 to June 2011**

<b>Date of Inspection</b>	<b>EPA Inspection No./Tier 1 Evaluation</b>	<b>Site</b>	<b>Docket Number/Approval Date</b>
	IN-ID-NRF-153 waste stream		
November 16-17, 2010	Continued Compliance Inspection		EPA Docket No. A-98-49; II-A4-142, March 16, 2011
<b>Los Alamos National Laboratory (LANL)</b>			
May 8-10, 2007	Initial RH Certification	<b>LANL</b>	EPA Docket No. A-98-49; II-A4-96, February 19, 2008
May 25-26, 2010	Tier 1 HENC 2 approval		EPA Docket No. A-98-49; II-A4-139, November 8, 2010
May 25-26, 2010	LANL-CCP CH TRU continued compliance inspection		EPA Docket No. A-98-49; II-A4-141, February 9, 2011
<b>Oak Ridge National Laboratory (ORNL)</b>			
June 2007	AK and NDA Activities Inspection	<b>ORNL</b>	EPA Docket No. A-98-49; II-A4-103, August 25, 2008
No date available	Tier 1 CH Calibration Extension for SGS		EPA Docket No. A-98-49; II-A4-108, October 8, 2008
November 17, 2008	Tier 1 CH Calibration Extension for DWAS IPAN		EPA Docket No. A-98-49; II-A4-109, January 8, 2009
June 30-July2, 2008	Initial RH Certification Inspection		EPA Docket No. A-98-49; II-A4-111, February 3, 2009
May 6, 2009	Tier 1 OR-REDC-RH-HET to include SETF Time Period (November 1978-November 1991) waste		EPA Docket No. A-98-49;II-A4-120, November 30, 2009
August 11-12, 2009	Tier 1 Addition of S4000 SCG waste		EPA Docket No. A-98-49; II-A4-117, October 8, 2009
February 23-24, 2010	Tier 1 Addition of CH VE		EPA Docket No. A-98-49; II-A4-125, March 30, 2010

**Table 6: EPA Waste Characterization Inspections – January 2008 to June 2011**

<b>Date of Inspection</b>	<b>EPA Inspection No./Tier 1 Evaluation</b>	<b>Site</b>	<b>Docket Number/Approval Date</b>
February-March, 2010 Desk top evaluation	Tier 1 Addition of RH SETF Pre-79 waste stream		EPA Docket No. A-98-49; II-A4-124, April 21, 2010
<b>Savannah River Site (SRS)</b>			
July 17-19, 2007, July 31-August 2, 2007, and December 4-5, 2007	Tier 1 Addition of SRS BCL waste stream SR-RL-BCLDP.001	<b>SRS</b>	EPA Docket No. A-98-49; II-A4-104, August 25, 2008
March 24-26, 2009	Tier 1 Addition of NABC		EPA Docket No. A-98-49; II-A4-114, August 4, 2009
September 30, 2010 Desk top evaluation	Tier 1 Addition of CH S3000 waste		EPA Docket No. A-98-49; II-A4-123, March 23, 2010
November 2009 – March 2010	Tier 1 Addition of SR-BCLDP.001.001, SR-BCLDP.001.002, SR-BCLDP.002, SR-BCLDP.003, SR-BCLDP.004.002, SR-BCLDP.004.003 waste streams		EPA Docket No. A-98-49; II-A4-129, September 13, 2010
March 24-26, 2009	Tier 1 Extension of calibration to the NABC		EPA Docket No. A-98-49; II-A4-133, September 14, 2010

**Table 7:**  
**EPA Quality Assurance Audits by Site – January 2008 to June 2011**

**Table 7: EPA Quality Assurance Audits by Site – January 2008 to June 2011**

<b>Site</b>	<b>Date</b>	<b>Purpose</b>
<b>Advance Mixed Waste Treatment Plant</b>	August 18-20, 2009	Recertification Audit A-09-19
	August 23-26, 2010	Recertification Audit A-10-24
	September 13-15, 2011	Recertification Audit A-11-21
<b>Argonne National Laboratory East-CCP</b>	July 10, 2008	RH VE Newly Packaged Waste Audit A-08-03
	August 5-7, 2008	CCP RH Recertification Audit A-08-24
	August 4-6, 2009	CCP RH Recertification Audit A-09-21
	August 3-5, 2010	CCP RH Recertification Audit A-10-23
	August 2-4, 2011	CCP RH Recertification Audit A-11-20
<b>Carlsbad Field Office</b>	June 29-July1, 2010 August 3-4, 2010	Audit of the DOE Peer Review used to qualify historical information for TRU waste streams SR-BCLDP-004.002 and SR-BCLDP-004.003. EPA Docket No. A-98-49; II-A1-108.
<b>GEVNC</b>	December 2-4, 2008	Initial RH S5000 Certification Audit A-09-05
	January 26-28, 2010	Recertification of RH S5000 Audit A-10-04
<b>Hanford</b>	April 6-8, 2010	CH Initial Certification Audit A-10-07
	April 5-7, 2011	CCP CH Recertification Audit A-11-10
<b>Idaho National Laboratory</b>	January 29-30, 2008	Expansion Audit (New Mexico Environment Department approval of AK) Audit A-08-11
	May 13-15, 2008	Recertification Audit A-08-10 INL and A-08-22 ID Labs
	December 9-11, 2008	Visual Examination of Records Audit A-09-08
	May 5-7, 2009	Recertification Audit A-09-14 INL and A-09-13 ID Labs
	June 8-10, 2010	Recertification Audit A-10-16 INL and A-10-17 ID Labs
<b>Los Alamos National Laboratory</b>	February 19, 2008	CCP RH Initial Certification Audit A-07-12 and A-07-13
	April 15-17, 2008	CCP CH and RH Recertification Audit A-08-16
	December 9-11, 2008	Addition of VE CH S5000 Retrievably Stored waste Audit A-09-08
	April 7-9, 2009	CCP CH and RH Recertification Audit A-09-12
	April 27-29, 2010	CCP CH and RH Recertification Audit A-10-14

**Table 7: EPA Quality Assurance Audits by Site – January 2008 to June 2011**

<b>Site</b>	<b>Date</b>	<b>Purpose</b>
<b>Los Alamos National Laboratory- Carlsbad office</b>	May 17-19, 2011	CCP CH and RH Recertification Audit A-11-11
<b>Oak Ridge National Laboratory</b>	November 13-15, 2007	AK and NDA Activities Audit A-08-06
	June 30-July2, 2008	Initial RH Certification Audit A-08-12
	January 13-15, 2009	CH Recertification Audit A-09-07
	June 23-25, 2009	RH Recertification Audit A-09-22
	July 28-30, 2009	Addition of S4000 SCG Audit A-09-24
	February 9-11, 2010	CH and RH Recertification Audit A-10-08
	February 8-10, 2011	CH and RH Recertification Audit A-11-08
<b>Sandia National Laboratories</b>	None reported	
<b>Savannah River Site</b>	October 28-30, 2008	CH and RH Recertification Audit A-09-01
	March 24-26, 2009	Addition of NABC Audit A-09-17
	June 23-24, 2009	Addition of RTR #4 Audit A-09-16
	October 27-29, 2009	BCL RH Recertification and CH S3000 Initial Certification Audit A-10-01
<b>Washington TRU Solutions</b>	None reported	

## Summary

The DOE believes the changes reported in this version of the WIPP Change Report do not represent significant changes pertaining to the disposal system.

## References

Letter from Reyes (EPA) to Moody (DOE), March 7, 2008.

Letter from Moody (DOE) to Reyes (EPA), July 28, 2010.