



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

COPY

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DEC 20 2007

OFFICE OF
AIR AND RADIATION

Dear Dr Moody:

During the week of July 9, 2007, the U.S. Environmental Protection Agency (EPA) performed inspections of the Waste Isolation Pilot Plant (WIPP) waste management and storage operations (EPA-WIPP-7.07-10a), emplacement (EPA-WIPP-7.07-10c) and the monitoring program (EPA-WIPP-7.07-10b). These inspections were performed under the authorities of 40 CFR 194.21 and 40 CFR Part 191, Subpart A.

As a result of the inspections, EPA determined that the activities related to emissions monitoring during waste management and storage continue to comply with the requirements of 40 CFR Part 191, Subpart A. However, to ensure proper performance of the Station A shrouded probes, DOE needs to continue to increase the probe cleaning frequency as salt loading conditions warrant. We also determined that DOE continues to adequately monitor the ten parameters that are important to the long-term containment of waste, as identified in EPA's 1998 Certification Decision. EPA also determined that waste is presently emplaced adequately, although EPA recommends that DOE maintain a permanent photographic record of the RH canister number as it is removed from the transportation cask.

Copies of these inspection reports are enclosed with this letter and will be placed in the EPA public docket. If you have any questions regarding the enclosed reports, please call Chuck Byrum at (214) 665-7555.

Sincerely,

Juan Reyes, Director
Radiation Protection Division

Enclosure

cc: Russ Patterson, DOE/CBFO
George Basabilvaso, DOE/WIPP
Steve Zappe, NMED
EPA WIPP Team, EPA Docket

UNIQUE #	DOE UFC	DATE REC'VD	ADDRESSEES
2007-11	1000	JAN 16 2008	See list on the back

DOCKET NO: A-98-49

Item: II-B3-102

Emplacement Inspection Report

EPA INSPECTION No. EPA-WIPP-7.07-10c

OF THE

WASTE ISOLATION PILOT PLANT

July 10 – 12, 2007

U. S. ENVIRONMENTAL PROTECTION AGENCY

Office of Radiation and Indoor Air

Center for the Waste Isolation Pilot Plant

1310 L. Street, N. W.

Washington, DC 20005

September 2007

Contents

1.0	Executive Summary.....	4
2.0	Inspection Purpose and Scope.....	5
3.0	Inspection Team, Observers and Participants.....	5
4.0	Performance of the Inspection.....	6
5.0	Waste Emplacement/WWIS.....	8
6.0	Magnesium Oxide Backfill.....	10
7.0	RH Operation.....	12
8.0	Comparison with Inventory limits.....	13
9.0	Summary of Results.....	14

Attachments

Attachment A – Inspection Plan.....	15
Attachment B – Number of Waste Containers Emplaced as of July 9, 2007.....	16
Attachment C - Material Emplaced in WIPP as of July 12, 2007.....	18
Attachment D -- WWIS Administration Status Display	19
Attachment E – Summary of MgO Safety Factor Calculations.....	20
Attachment F – Room 3, Panel 3 MgO Safety Calculations for August 27, 2006	21
Attachment G – Procedures Examined.....	22
Attachment H – Inspection Checklist.....	24
Attachment I – Documents and Records Received During the Inspection.....	29

1.0 EXECUTIVE SUMMARY

The U.S. Environmental Protection Agency (EPA or the Agency) conducted an inspection of the U.S. Department of Energy's (DOE) Waste Isolation Pilot Plant (WIPP) near Carlsbad, New Mexico, from July 10 to July 12, 2007, in accordance with 40 CFR 194.21. The WIPP is a disposal system for defense-related transuranic (TRU) waste as defined by the WIPP Land Withdrawal Act.¹ EPA certified that the WIPP complies with the Agency's radioactive waste disposal regulations (Subparts B and C of 40 CFR Part 191) on May 18, 1998.

The purpose of this annual inspection was to determine if waste sent to WIPP during the past year has been emplaced in the underground facility in the manner specified in DOE's Compliance Certification Application and other approvals. A specific focus of this inspection was to review the site's ability to receive, process, and emplace contact-handled and remote-handled TRU wastes within the repository, the emplacement of magnesium oxide (MgO) backfill in appropriate amounts to fulfill DOE commitments and requirements, maintenance of relevant waste packaging records, including the electronic WIPP Waste Information System (WWIS). EPA looked at selected activities, such as RH and CH waste processing, waste emplacement activities, and record keeping.

EPA concluded that DOE's emplacement activities are adequate, that CPR is appropriately tracked and recorded, that additional MgO is calculated properly, and that MgO is emplaced properly. While DOE does not necessarily maintain an MgO safety factor above 1.67 for operational efficiency while loading waste in a room, DOE does place enough MgO before room closure is completed to assure that the safety factor is maintained for each room.

EPA did not identify any findings or concerns during this inspection. EPA does have one recommendation: that DOE retain a photographic record that verifies the canister identification number of the remote-handled canister as it is transferred from the transportation cask to the facility cask and include the record with the permanent record package.

¹WIPP Land Withdrawal Act, Public Law 102-579, Section 2(18), as amended by the 1996 WIPP LWA Amendments, Public Law 104-201.

**Table A
Inspection Participants**

INSPECTION TEAM MEMBER	POSITION	AFFILIATION
Chuck Byrum	Inspector	EPA ORIA
Tom Peake	Inspector	EPA ORIA
Shankar Ghose	Inspector	EPA ORIA
CBFO / WTS PERSONNEL		
Mike Oliver		DOE/CBFO
Art Chavez		WRES
Randy Britain		WTS
Dave Kump		WTS
Dave Speed		WTS
John Vandekraats		WTS
Linda Frank-Supka		WTS
Mike Strum		WWIS
Ed Flynn		WTS

4.0 PERFORMANCE OF THE INSPECTION

The inspection took place on July 10 - 12, 2007, at DOE's Carlsbad Field Office (CBFO) and at the Waste Isolation Pilot Plant (WIPP) facility, which is located approximately 26 miles south east of Carlsbad, New Mexico. The opening meeting with CBFO and WTS personnel was held on the morning of July 10, 2007. Several DOE and WTS staff presented information addressing program status, updates and changes since the last EPA emplacement inspection in 2006 : primarily CH-RH waste processing, MgO emplacement and waste record keeping.

The EPA inspectors accompanied CBFO and WTS personnel into the underground repository on the morning of July 11, in order to examine waste packages and MgO that had been emplaced in Panel 4. Inspectors selected several containers and recorded their numbers (see Figure 5 for container locations); the records for these containers were examined later in the WWIS computer database to verify correct waste information is recorded by DOE. The WTS personnel explained how waste packages are handled, emplaced, and answered EPA questions.

5.0 WASTE EMPLACEMENT/WWIS

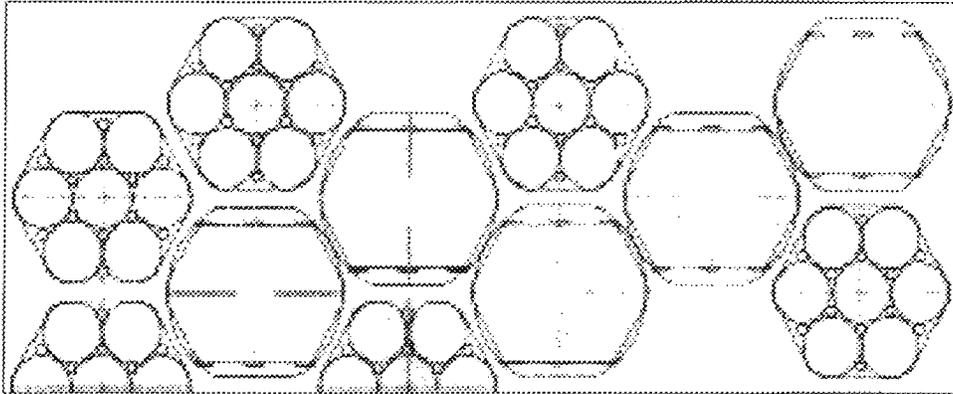


Figure 2

Figure 2 Illustrates the arrangement of disposed waste in underground. Represented are stacks of seven-packs of drums and standard waste boxes.

The repository is subdivided into panels, each panel consisting of seven rooms. At the time of the inspection, CH waste was being emplaced in Room 6 of Panel 4. Waste containers are stacked in columns (waste stacks) combining SWBs, drum packs, and TDOPs (see Figure 3, 4, and 5). TDOPs are always placed on the floor of the room, occupying the bottom and middle position of a waste column. SWBs and drums are emplaced in no particular order with most wastes emplaced as received. The waste columns are in a series of staggered rows, with a row consisting of three columns that span the distance of a disposal room from left to right (Figure 2 and 3). Remote-handled waste is placed in the walls on eight foot centers (Figures 3, 6, and 7).

While underground in Room 6, Panel 4, the EPA inspector selected recently emplaced waste packages for review. The inspector read the shipment identification numbers directly off the emplaced containers (See Figure 5 for CH locations). The containers selected are identified in Table B below.

Table B

Waste Containers Reviewed During Inspection (Panel 4, Room 6)
CH Waste (Field verified)

<u>Site of Origin</u>	<u>Waste Container Identifier</u>	<u>Container Type</u>
LANL	LASB00184	Standard Waste Box
INEEL	BN10173001	100-gallon drum
INEEL	BN10147029	55-gallon drum

RH Waste (Panel 4, Room 5) Waste Emplacement Report and Container Data Report

<u>Site of Origin</u>	<u>Waste Container Identifier</u>	<u>Borehole Number</u>
ANL-E	ID0015	079
ANL-E	ID0028	022

EPA inspectors examined reports from the following WIPP Waste Information System (WWIS) modules:

- Characterization Module, linked to the Waste Container Data Report
- Certification Module, linked to the Acceptance/Rejection Report
- Shipping Module, linked to the Shipment Summary Report
- Inventory Module, linked to the Nuclide Report, Waste Emplacement Report and the MgO safety factor calculation on the Emplace Containers Underground (Attachments G).

All records were found to contain the required information. EPA recommends that a permanent photographic record of the RH canister number be placed in the RH record package to enhance traceability and ensure that correct containers are processed.

6.0 MAGNESIUM OXIDE BACKFILL

Magnesium oxide (MgO) is used in the repository as backfill, as specified in DOE's Compliance Certification Application (CCA). EPA requires DOE to maintain an MgO safety factor (e.g. excess MgO) of 1.67 or greater, which means that MgO in amounts of at least 1.67 times the amount of carbon will always be in the repository to control chemical conditions and remove carbon dioxide gas.

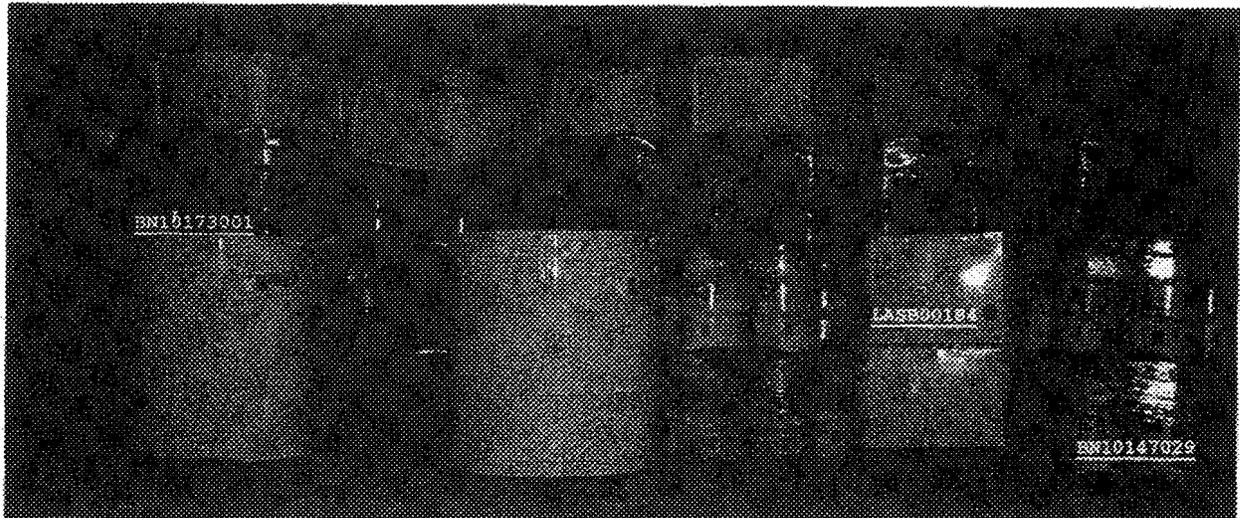


Figure 5
Emplaced CH Waste in Room 6 Panel 4

7.0 RH Operation

The first shipment of RH waste was received on January 23, 2007 and was emplaced on January 28, 2007. A preliminary emplacement forecast indicates that DOE plans to dispose a total of 93 containers in Rooms 3 through 7 in Panel 4. However, this forecast may vary due to weather, regulatory or procedural delays and generator site shipping rates.

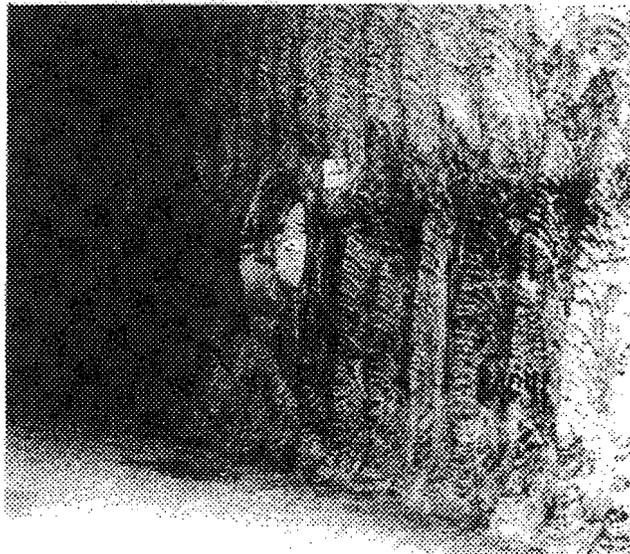


Figure 6
RH Boreholes in the wall with disposed containers at 8 feet interval

As of this inspection the WIPP contained 2.9×10^6 kg of CPR in waste and 1.3×10^6 kg of CPR in packaging material. In addition emplacement CPR, such as the slipsheets used to aid the emplacement of the containers, accounts for another 0.3×10^6 kg of CPR. This is a total of nearly 4.6×10^6 kg of cellulosic, plastic and rubber material. Most of this is split between the cellulosic and plastic materials; the mass of rubber materials now account for about 4.5% of the total mass of CPR, compared to 7% in 2006. Thus, the WIPP is approaching 21% of the CPR limit.

Table C
Emplaced CPR Quantities as of July 9, 2007
 (Source: Opening Meeting Handout)

Waste CPR:		Emplacement CPR:	
Type	Weight (kg)	Type	Weight (kg)
Cellulosic	1,002,795	Cellulosic	74,557
Plastic	1,714,192	Plastic	260,560
Rubber	205,068		
Total	2,922,055 (kg)		335,117 (kg)
Packaging CPR:		Grand Totals:	
Type	Weight (kg)	Cellulosic + Plastic =	4,377,113
Cellulosic	829,226	Rubber =	205,068
Plastic	495,783		
Total	1,325,009 (kg)		4,582,181 (kg)

9.0 SUMMARY OF RESULTS

The inspectors reviewed emplacement operations and associated documentation for selected containers. EPA concluded that DOE's emplacement activities are adequate, that CPR is appropriately tracked, the safety factor is calculated properly, additional MgO is added as needed, and that all MgO is emplaced properly. DOE noted that the current safety factor was above the mandated 1.67 for closed rooms since the tracking officially began with Room 1, Panel 2 and Room 7, Panel 3 at the time of the inspection (see Attachment E).

The surface processing of RH and the underground operation of RH container emplacement were explained and found to be according to specified plans documented in CCA. EPA did not identify any findings or concerns during this inspection. However, EPA recommends that DOE maintain a permanent photographic record of the RH canister number as it is removed from the transportation cask.

Attachment B

Number of TRU Waste Containers Emplaced at WIPP as of 07/09/2007

Contact Handled Waste

Site Container Type	100 gallon	55 gallon	Pipe overpack	S100	Std Waste Box	TDOF	85 gallon overpack	Dunnage drum	Dunnage Std Waste Box	2007 total	2006 total
ANLE	0	318	0	0	0	12	0	4	0	334	334
RL	0	4682	2128	0	270	232	0	78	0	7390	6159
INEEL	8628	17883	0	0	1700	1942	0	569	0	30722	23564
LANL	0	5719	293	13	350	0	0	669	0	7046	5040
LINL	0	678	0	0	2	0	0	8	0	688	688
NTS	0	1805	0	0	14	0	0	8	0	1827	1827
RFETS	0	15460	21174	0	5910	4	0	529	0	41077	41077
SRS	0	2380	0	0	474	1901	0	0	0	4753	4173
WIPP	0	2	0	0	0	0	2	3073	13	3090	3006
TOTAL	8628	48927	23597	13	6720	4091	2	4938	13	96929	85868

Attachment C

Materials Emplaced in WIPP as of July 12, 2007
(Table configuration modified for simplification)

CH WASTE:

MP	Material Type	Material Description	Material Weight (kg)
1	Waste	Iron base Metal Alloys	4,409,840.85
2	Waste	Aluminum Based Metal /Alloys	34,829.55
3	Waste	Other Metal/ Alloys	267,080.21
4	Waste	Other Inorganic Materials	1,033,089.91
6	Waste	Cellulosics	1,006,250.90
7	Waste	Rubber	205,468.94
8	Waste	Plastics	1,716,987.26
9	Waste	Solidified Inorganic Material	5,489,821.21
10	Waste	Solidified Organic Material	301,181.81
12	Waste	Soils	9,282.60
13	Steel - Packaging	Steel Container Materials	9,463,057.44
14	Plastic - Packaging	Plastic /Liners Container Materials	496,012.31
15	Cellulosic - Packaging	Cellulosic Packaging Materials	829,256.18
18	Emplacement	Cellulosic Emplacement Material	40,388.44
20	Emplacement	Plastic Emplacement Material	1,346,614.10

RH Waste

1	Waste	Iron Base Metal Alloys	2,551.70
13	Steel Packaging	Steel Container Materials	19,646.00
14	Plastic Packaging	Plastic/ Liners Container Materials	41.08

MgO

16	Emplacement	Magnesium Oxide	19,078,590.11
18	Emplacement	Cellulosic Emplacement Material	34,299.90
20	Emplacement	Plastic Emplacement Material	39,947.40

Attachment E
Summary of MgO Safety Factor Calculations

MgO-Related information

Panel	Room	MgO (kg)	Waste (kg)	CFR (kg)	Safety Factor
1	7	1,127,526	506,254	276,990	2.01
	6	222,885	101,210	86,116	1.44
	5	222,885	160,047	79,213	1.56
	4	228,600	128,597	85,525	1.81
	3	1,034,415	749,764	342,069	1.67
	2	1,028,825	948,002	229,442	2.17
	1	617,220	311,843	138,330	2.14
2	7	1,028,700	571,001	236,830	2.09
	6	982,980	461,528	209,305	2.20
	5	988,820	498,970	197,609	2.29
	4	977,265	518,555	220,912	2.17
	3	1,028,700	667,662	211,941	2.27
	2	965,835	733,025	165,412	2.62
	1	691,515	416,679	186,280	1.71
3	7	960,120	711,188	104,831	4.03
	6	954,405	876,558	228,033	1.95
	5	1,022,985	608,693	284,651	1.70
	4	960,120	895,470	255,054	1.79
	3	931,545	1,000,561	243,860	1.89
	2	944,880	1,004,479	227,689	2.03
	1	682,940	723,043	183,072	1.76
4	7	948,640	1,051,082	248,924	1.91
	6	457,200	531,323	125,282	1.83
	5	0	4,038	2,313	.00

**Attachment G
Procedures Examined**

- > COB-E2007-2 and -S8 : *CH Waste Processing, Technical Procedure WP 05-WH1011, Revision 26;*
Effective Date: March 28, 2007
- > COB-E2007-18 : *Waste Stream Profile Form Review and Approval Program, WP 08-NT.03, Revision 8, October 18, 2006*
- > COB-E2007-17 : *TRU Waste Receipt, Management Control Procedure, WP 08-NT3020, Revision 13, Effective Date: November 16, 2006*
- > COB-M2007-1 : *WIPP Waste Information System User's Manual WWIS Version 5.4a, DOE/CBFO 97-2273, Rev. 12, March 2007*
- > COB-E2007-16 and -S14 : *WIPP Waste Handling Operations WWIS User's Manual, WP 05-WH.01 Revision 2; Effective Date: October 5, 2006*
- > COB-M2007-L1 : *WIPP Contact Handled (CH) Waste Documented Safety Analysis DOE/WIPP-95-2065, Revision 10, November 2006*
- > COB-M2007-L2 : *WIPP RH Waste Documented Safety Analysis DOE/WIPP-06-3174, Revision 0, March 2006*
- > COB-E2007-25 : *WIPP RH Technical Safety Requirement DOE/WIPP-06-3178, Revision 0, March 2006*
- > COB-E2007-S18 : *Specification for Prepackaged MgO Backfill, Specification, D-0101, Revision 7, Revision Date: May 12, 2005*
- > COB-E2007-1 : *Conduct of Operations WP 04-CO, Revision 7, Effective Date: October 24, 2006*
- > COB-E2007-3 : *Horizontal Emplacement and Retrieval Equipment Assembly, Technical Procedure, WP05-WH1700, Revision 4, Effective Date: February 14, 2007*
- > COB-E2007-22 : *Road Cask Transfer Car Operation, Technical Procedure, WP 05-WH1701, Revision 9, Effective Date: October 31, 2006*
- > COB-E2007-23 : *Facility Cask Transfer Car 41-H-003 Operation, Technical Procedure, WP 05-WH1704, Revision 6, Effective Date: January 19, 2006*
- > COB-E2007-24 : *RH Canister Transfer System, Technical Procedure, WP 05-WH1705, Revision 6, Effective Date: June 27, 2006*
- > COB-E2007-4 : *RH-TRU 72-B Trailer Unloading, Technical Procedure, WP 05-WH1709, Revision 10, Effective Date: May 16, 2007*

Attachment H
2007 EPA Emplacement Inspection Checklist

#	Questions:	Comments and Objective Evidence	Results
	Question: Waste Emplacement		
1	Is waste being emplaced in the underground facility in the manner specified in DOE's Compliance Certification/ Re-Certification or other relevant documentation?	<p>Yes for CH. Procedure WP 05-WH1011, Rev. 26, CH Waste Processing, Steps 4 to 7, pages 25 through 29 describe the waste emplacement process. Visual verification of the emplaced waste in Row 93 and 95 of Panel 4, Room 6 was conducted. SWB (LA SB00184), a 55 gallon (BN 10147029) and a 100 gallon drum (BN1017301) were included in these rows.</p> <p>Yes for RH. RH processing procedures for 72-B (WP 05-WH1710) and 10-160-B (WP 05-WH1722) containers are consistent with the approach discussed in the CCA documentation.</p>	Satisfactory
2	Are CH waste containers stacked in columns appropriately given the type of container?	Yes, waste is being emplaced appropriately. Procedure WP 05-WH1011, Attachment 4, Waste Emplacement Report Data Sheet. The waste stacking arrangement was verified during the inspection in Room 6 Panel 4.	Satisfactory
3	Are records adequate? Randomly select three CH and two RH waste containers to verify records for waste approval, shipment, and receipt.	<p>Yes. TRU Waste Receipt WP 08-NT3020, Rev. 13 describes the process. Records produced are Uniform Hazardous Waste Manifest, TRU Waste Receipt Checklist, Shipment Summary Report, RH waste Processing Data Sheet, Radiological Survey Report, and Waste Emplacement Report. See RH Doc Packages (COB-E2007-S6) and (COB-E2007-S7) for example. CH waste produces comparable records. EPA reviewed records and found the records to be adequate and traceable.</p> <p>Selected Containers: CH -LASB00184 (standard waste box), BN10147029 (55-gal), BN10173001 (100-gal) (see Figure 5) RH -ID0015, ID0028</p>	Satisfactory
4	Is DOE properly emplacing backfill material (magnesium oxide [MgO]) with the waste packages? That supersacks are placed on top of waste stacks according to procedure?	Yes. Procedure WP 05-WH1011, Rev. 26, CH Waste Processing, Section 5.0, requires MgO to be placed on each waste column. While underground the inspectors observed that each waste column had a MgO supersack emplaced (Figure 5).	Satisfactory

11	Volume and mass and/or concentration of important waste components and radionuclides (RH and CH)? Are they within statutory and regulatory limits?	Waste Container Data Report showing detailed description of nuclide information for the container numbers -- BN10147029 (CH) and ID0028 (RH) were generated and verified by the inspectors. Yes	Satisfactory
	Question: Procedure		
12	For the MgO needed for high CPR, are there procedures or documentation for the WHE or WHM (or other appropriate personnel) identifying when and where additional MgO is needed?	In the WIPP Waste Handling Operation WWIS User's Manual, WP 05-WH.01, Revision 2, 10/5/06, Attachment 1 -- special requirements for additional MgO are discussed and CH Waste Processing, WP 05-WH1011 Section 5.0-NOTE, states that the WHE will calculate the safety factor (SF) at the end of each shift and that the WHM must be notified if the SF is below 1.67. EPA verified that this process is performed (Attachments F).	Satisfactory
13	Is there documentation that identifies how the MgO should be placed with high CPR waste?	Yes. Section 5.2 of WP 05-WH1011 requires that additional supersacks are to be placed in the waste stack if the WHM determines that it is required.	Satisfactory
#	Question: Records/WWIS		
14	Does the WWIS adequately document waste shipment and emplacements information for waste containers selected item 3 above? CH, RH	Yes. In the Waste Emplacement Report, the WWIS adequately documents waste shipment and emplacement information. WWIS Waste Emplacement Reports, WWIS Waste Container Data Report (for containers ID0015, ID0028, BN10173001) contain container number, shipment number, emplacement information in the underground. These data were verified for waste containers by the inspectors.	Satisfactory
15	Is DOE maintaining records of waste shipments and emplacement properly? CH, RH	Yes, WWIS Reports (Waste Container Data Report, Emplacement Report, RH Receipt) and underground maps verify that records are properly maintained for both CH and RH waste containers.	Satisfactory
16	Do the characterization module, certification module, shipping module, and inventory module adequately record the required information?	Yes. DOE staff queried the WWIS for this information and demonstrated (via Waste Container Data Reports, and Shipment Summary Reports) that they adequately recorded the required information. WP 05-WH.01, WP 05-WH1729, WP 08-NT3020 describe the procedures for recording of data. The inspectors examined waste containers, ID0015, ID0028, BN10173001 documents to verify that this information is adequately recorded.	Satisfactory
17	Characterization Module - Review a WWIS Waste Container Data Report. Does this report adequately record the Waste Stream Profile Form information?	Yes. WWIS staff generated the Waste Container Data Reports for BN10173001, BN10147029, ID0028, and ID0015. These reports contain Waste Stream Profile information for each container. The inspectors verified that this module contains this information.	Satisfactory

24	<p>Does the WWIS accurately calculate the 1.67 safety factor and recommend the proper amount of MgO to emplace?</p> <p>Where has this been verified?</p>	<p>Yes. This is performed on a regular basis. WIPP Waste Handling Operations WWIS User's Manual, WP 05-WH.01, Section 6.2.5 and Attachment 1 describes the steps. During the 2006 annual inspection EPA verified that the amount of MgO is properly determined and is documented in WWIS. The Software Validation Test, MgO Emplacement process and Safety Factor Calculation Revision 0, March 2, 2005 documents the testing of the new modules added to WWIS to track MgO and calculate the safety factor on an ongoing basis room by room. The inspector verified that this approach has not changed.</p>	Satisfactory
25	<p>Is there documentation that describes how the site will use and implement the MgO module of the WWIS?</p>	<p>Yes. WIPP Waste Handling Operations WWIS User's Manual, WP 05-WH.01, Section 6.2.5 notes that the waste handling engineer is to input MgO data into the WWIS. The MgO safety factor calculation is done routinely as described in WP 05-WH.01, Attachment 1. The inspector verified this activity (see Attachment G).</p>	Satisfactory

- > COB-E2007-S14 : WIPP Waste Handling Operations WWIS User's Manual, WP 05-WH.01, Revision 2, 10/5/06
- > COB-E2007-S15 : Waste Container Report for container LASB00184
 - List details about a specific containers characteristics; such as: generator site waste stream types, activities, weights.
- > COB-E2007-S16 : WWIS Shipment Summary Report for container LASB00184
 - List waste codes, radionuclide activity, and material weights for each container.
- > COB-E2007-S17 WWIS Waste Emplacement Report for container LASB00184
 - Documents specifics about underground location of waste containers.
- > COB-M2007-W1 : Nuclide Report RPO380 from the WWIS at 1530 on 071207
 - List the total masses and radionuclide activity for each Panel and Room.
- > COB-M2007-W2 : WWIS Shipment Summary Report for container BN10173001
 - List waste codes, radionuclide activity, and material weights for each container.
- > COB-M2007-W3 : WWIS Shipment Summary Report for container ID0028
 - List waste codes, radionuclide activity, and material weights for each container.
- > COB-M2007-W4 : Waste Container Data Report for container BN10147029
 - List details about a specific containers characteristics; such as: generator site waste stream types, activities, weights .
- > COB-M2007-W5 : Waste Container Data Report for container BN10173001
 - List details about a specific containers characteristics; such as: generator site waste stream types, activities, weights.
- > COB-M2007-W6 : Waste Container Data Report for container ID0028
 - List details about a specific containers characteristics; such as: generator site waste stream types, activities, weights.
- > COB-M2007-W7 : Waste Container Data Report for container ID0015
 - List details about a specific containers characteristics; such as: generator site waste stream types, activities, weights.