Subject: LANL - Daily Technical Call Submission - June 4, 2014

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Gentlemen

Attached is the written daily submission from today's pre-scheduled technical call. The Permittees are submitting this pursuant to Section 19 of the May 19, 2014, *Administrative Order*, and Section VIII of the May 29, 2014, *Revised LANL Nitrate Salt-Bearing Waste Container Isolation Plan*.

If you have any revisions, please let me know.

We will talk with you on tomorrow's call.

Thank you

Tori

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NMED / LANL Technical Call

June 4, 2014

Participation:

- New Mexico Environment Department: Tom Blaine, Jeff Kendall, John Keiling, Steve Pullen, Tim Hall.
- LANL - Los Alamos Field Office: Lee Bishop.
- LANL - Los Alamos National Security: Jeff Mousseau, Deb Woitte, Tori George, Katie Roberts.

Initial Daily Technical Call:

- Jeff Kendall stated this is the first of the technical calls pursuant to NMED's May 19, 2014, *Administrative Order* and LANL's May 29, 2014, *Revised Nitrate Salt-Bearing Waste Container Isolation Plan* (Revised Isolation Plan).

- Tom Blaine stated NMED's expectation that these calls will occur daily on business days until NMED indicates otherwise.

Revised LANL Nitrate Salt-Bearing Waste Container Isolation Plan:

- Jeff Mousseau discussed LANL status (details below).

- All actions specified in Section VII (Schedule) are complete.

- Overpacking (into SWBs) of all remediated nitrate salt-bearing wastes at LANL.
    - Completed May 18, 2014.
    - Remediated nitrate salt-bearing wastes – the 57 containers are packaged within 55 SWBs (that is, 2 SWBs have 2 containers which are part of the original packaging configuration from loaded TRUPACTS).

- Movement of nitrate salt-bearing wastes (SWBs and 85-gallon containers) to designated areas.
    - Move to Dome 231 (unremediated drums) and Dome 375 Permacons (remediated drums) completed by June 3, 2014.
    - As discussed in the Revised Isolation Plan - both Permacons have dry-pipe fire protection system (water), fire alarm pull stations, HEPA filtration, temperature control, negative pressure, and continuous air radiological monitoring.
    - Access has been limited as discussed in the Revised Isolation Plan.

- Daily/Hourly monitoring of waste containers.
    - Remediated nitrate salt-bearing waste containers.
        - Daily temperature monitoring began May 1, 2014.
        - Hourly visual inspections began May 17, 2014.

    - Unremediated nitrate salt-bearing waste containers.
        - Daily temperature monitoring began May 20, 2014.
        - Hourly visual inspections began May 20, 2014.

- Appropriate spacing of SWBs and 85-gallon containers.
    - Spacing in 231 and 375 Permacons was completed by June 3, 2014.
    - Containers (SWBs and 85-gallon overpacks) are:
        - Spaced 2 feet apart.
        - Placed in rows that allow for egress and that meet aisle spacing requirements of the LANL RCRA Hazardous Waste Facility Permit.

- Updating of procedures / safety basis documents as appropriate.
    - Completed by May 30, 2014.

- Labels for SWBs.
    - Completed May 18, 2014.

- Remediation Team kick-off.
    - Completed May 20, 2014.
    - The Remediation Team is looking at potential treatment approaches. They are also looking at potential pacification approaches, to be able to respond should such approaches be required. The Permittees will discuss proposals / plans with NMED – including any permit modifications or authorizations that may be necessary.

LANL Technical Update:

- **Location of Nitrate Salt-Bearing Wastes**

    - Remediated nitrate salt-bearing waste containers.
        - 57 containers in 55 SWBs.
        - All containers remain in the 375 Permacon.

    - Unremediated nitrate salt-bearing waste containers.
        - 29 containers, all in 85-gallon overpacks.
        - All containers remain in the 231 Permacon.

- **Monitoring - Daily Temperature**
    - Temperatures remain below 90°F.

- **Monitoring – Visual Inspections**
    - No abnormal conditions.
    - May 31, 2014. During hourly inspections in accordance with EP-AREAG-FO-DOP-1246, R0, *Nitrate Salt-bearing TRU Waste Container Monitoring*, inspections were paused upon identification of an indication of a potential abnormal condition. Specifically, one hazardous waste all-in-one label on a container in the 375 Permacon had begun to fade from yellow to white. All other indications were normal. The Shift Manager paused the inspection at 1550 hrs. Upon further investigation, it was determined that the discoloration was due to application of Fantastik and there was no abnormal condition. Surveillances continued at 1811 hrs.

- **Additional measures currently underway**
    - As a conservative measure, LANL is currently conducting additional monitoring on container 68685. This additional monitoring includes:
        - Collecting a daily head space gas sample (analyzed for CO_2, H_2, CH_4, and VOCs).
            - CO_2 - increasing trend, moving towards equilibrium between SWB and drum.
            - H_2, CH_4, and VOCs - all below LFLs.
        - Hourly temperature measurements.
            - Temperatures remain below 90°F.

- **Anticipated Changes to Nitrate Salt-Bearing Waste Containers (e.g. movement, re-packaging).**
    - Currently, no further movements or re-packaging are planned.
    - As a conservative measure, based on recent information, LANL is evaluating the remaining unremediated nitrate salt-bearing waste containers with free liquids for application of the D002 code.

- **Other**
    - On June 3, 2014, a preventative maintenance task was performed on one of the air movers connected to the Dome 375 Permacon. At the time of the hourly check, one air mover was locked out/isolated to allow maintenance to perform the electrical and mechanical preventative maintenance task on that unit. While maintenance was being performed the other air mover was fully operational and the engineered minimum negative pressure for the Permacon was maintained.

Requested Information / Pending Issues:

	Requested Information	Actionee	Status	Completion Date
1.	NMED contact / process for LANL to notify NMED under the Revised Isolation Plan (e.g., 24 hour notices).	NMED		
2.	Keep NMED informed on status of on-going chemistry / analytical work.	LANL		
3.	On upcoming daily call, provide additional discussion on the potential for liquids in the 378 post-1991 cemented containers (including a discussion of the review of RTR tapes).	LANL		
4.	On upcoming call, provide additional discussion on why 231 and 375 Permacon fire suppression systems are not part of the LANL RCRA Hazardous Waste Facility Permit Contingency Plan.	LANL		

Next Call:

- Thursday, June 5, 2014 - at 10 am.