Subject: LANL - Daily Technical Call Submission - June 5, 2014

EP2014-5162

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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

Tori George

Program Director for Regulatory Management
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NMED / LANL Technical Call

June 5, 2014

Participation:

- New Mexico Environment Department: Tom Blaine, Jeff Kendall, John Kieling, Trais Kliphuis, Steve Pullen, Tim Hall.
- LANL - Los Alamos Field Office: Dave Nickless, Lisa Cummings, Karen Armijo.
- LANL - Los Alamos National Security: Jeff Mousseau, Deb Woitte, Tori George, Kathy Johns-Hughes, Alison Dorries, Tony Grieggs, Gian Bacigalupa.

LANL Technical Update:

- **Location of Nitrate Salt-Bearing Wastes**
  - Remediated nitrate salt-bearing waste containers.
    - All containers remain in the 375 Permacon.
  - Unremediated nitrate salt-bearing waste containers.
    - All containers remain in the 231 Permacon.

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

- **Monitoring – Visual Inspections**
  - No abnormal conditions.

- **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.
      - CO_2 - increasing trend, moving towards equilibrium between SWB and drum. The Permittees are working with LANL chemistry SMEs, and will continue to watch this trend.
      - 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 applying the D002 code to the remaining unremediated nitrate salt-bearing waste containers with free liquids.

- **Other**

  - Emergency Preparedness
    - On June 3, 2014, LANL conducted a 'table-top' of an emergency exercise associated with the nitrate salt-bearing waste. Participants included the Los Alamos Fire Department, LANL emergency management, LANL hazardous material response personnel, and TA-54 operations personnel. An exercise is being planned for mid-June.

    - On June 4, 2014, LANL tested the pull stations in the 375 Dome. All performed satisfactorily. LANL will be testing the 231 Dome pull stations today.

    - LANL had planned to conduct the second of three facility walk-downs with the LAFD of Area G (with specific emphasis on nitrate salt-bearing waste in Permacons 231 and 375). We are conducting three walk-downs in order to provide information to each of the three LAFD shifts. However, LAFD had to respond to a non-LANL issue in the townsite. This second walk-down will be rescheduled. LANL has also previously conducted facility walk-downs with LANL emergency management and hazardous material personnel.

  - Remediation Team
    - The Permittees clarified that their Remediation Team is looking at potential remediation approaches, in order to be able to respond should such approaches be required. The Permittees are evaluating remediation-related issues such as porosity and absorption, but are not conducting these evaluations on actual waste. The Permittees will not take any remediation actions before discussing the proposals / plans with NMED – including discussing any permit modifications or authorizations that may be necessary.

Requested Information / Pending Issues:

- **231 and 375 Permacon Fire Suppression Systems**
  - As discussed in the May 29, 2014, Revised Isolation Plan, there are dry-pipe fire protection systems within both the 231 and 375 Permacons. These fire protection systems are not included within the Contingency Plan in the LANL Hazardous Waste Facility Permit.

  - The 231 and 375 storage domes are the actual permitted units as defined by the Permit. The equipment listed in the Contingency Plan for these two

permitted units includes fire extinguishers, fire hydrants, and pull stations. Additionally, the LAFD is manned and available 24-hours a day. This equipment is listed in the Contingency Plan as the primary fire suppression system for normal waste storage in the domes. In the event of a fire in the storage domes, the alerting of the LAFD and availability of water for fire suppression in the hydrants would be the major provision for fire control.

- The Permacons are considered non-permanent structures located within the 231 and 375 storage domes. The Permacons have been generally used for processing operations on waste containers, a process that requires additional safety/emergency controls for the operations in the Permacons. Therefore, the Permittees did not credit these systems as fire control equipment in the Contingency Plan.

Summary Chart - 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	---	Complete June 5, 2014
2.	Keep NMED informed on the status of on-going chemistry / analytical work.	LANL	In progress. LANL will provide update to NMED.	
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	In progress. Will provide additional discussion on June 6, 2014 call.	
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	Discussed June 5, 2014 tech call Action: Include information discussed in June 5 tech call in written daily submission.	Complete June 5, 2014 Included in this written submission.
5.	Send copy of June 4, 2014 written daily submission to Trais Kliphuis. Also, include her on future daily submissions.	LANL	---	Complete June 5, 2014

Next Call: Friday, June 6, 2014 - at 10 am.