



**Department of Energy**  
Carlsbad Field Office  
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Carlsbad, New Mexico 88221  
FEB 26 2014

**RECEIVED**

**FEB 28 2014**

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

**NMED**  
**Hazardous Waste Bureau**

Subject: Request for an Extension to the Storage Times for the Parking Area Unit and Waste Handling Building

Dear Mr. Kieling:

The purpose of this letter is to request an immediate extension to the storage times for the Parking Area Unit and the Waste Handling Building (WHB) Unit at the Waste Isolation Pilot Plant (WIPP) facility. This extension is needed on or before February 27, 2014. In addition the Permittees are requesting the ability to implement Surge Storage prior to the Parking Area Unit reaching capacity, clarification of storage volume limitations, and authorization to store derived waste in the Permitted Unit.

The Permittees are specifically requesting the following:

- The requirement in Permit Attachment A1, Section A1-1e(2) bullet item 3 requiring Contact-Handled (CH) Packages to be moved from the Parking Area Unit into the WHB for unloading and storage on or before day 30 (after receipt at the WIPP) be extended to coincide with the Nuclear Regulatory Commission (NRC) venting date for waste currently in the Parking Area Unit. This extension of the 30-day requirement will make the 60-day venting period, required by the NRC, the prevailing requirement as described in Permit Attachment A1, Section A1-1e(2). This is needed by February 27, 2014.
- The Permittees are also requesting that the 60-day storage time limit for CH transuranic (TRU) mixed waste in the WHB, Permit Part 3, Section 3.1.1.7., be extended an additional 45 days to 105 days. Permit required inspections will continue during the extension and other applicable container storage requirements remain in effect, therefore, this extension does not create any additional risk to human health or the environment. This is needed on or before April 2, 2014.
- The Permittees are requesting to implement Surge Storage in the WHB without having the Parking Area Unit filled as required by Permit Attachment A1, Section A1-1c(1). This is needed no later than March 27, 2014.
- The Permittees are requesting clarification that the Table 3.1.1 Maximum Capacities for the CH Bay Storage Area is based on the volume limit values and not the Container Equivalent value. This is needed no later than March 27, 2014.

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- The Permittees are requesting to use the Remote-Handled (RH) Bay for the storage of waste derived from the recovery/cleanup activities associated with the events of February 5 and February 14, 2014. This is needed by March 1, 2014.

These requests are needed for the reasons stated below.

Due to two recent incidents, access to the WIPP facility is limited to those personnel essential to investigating the incidents and returning the facility to normal operations. Waste handling operations have been suspended. The underground facility is currently not accessible and waste cannot be processed for underground emplacement. The request for an extension provides the opportunity to safely and methodically plan and perform surface activities and to plan for re-entry and evaluation of the underground conditions. These extension measures will also help assure control of the underground situation and protect human health and the environment.

Because of this, CH TRU mixed waste containers are being retained in the WHB and in the Parking Area Unit. Retaining waste in its current configuration poses several waste storage concerns. The first is related to the conditions in Permit Attachment A1, Section A1-1e(2) bullet Item 3. This requires that waste in the Parking Area Unit be unloaded within 30 days of receipt. Some packages in the Parking Area Unit are near their 30-day time limit (see Enclosure 1). The Permittees are requesting to retain these in their shipping packages until preliminary investigations are completed. This is why it is necessary to change the 30-day limit to coincide with the 60-day NRC venting period as described in Permit Attachment A1, Section A1-1e(2). Second, underground re-entry activities, including planning, inspections/investigations and potential decontamination activities are expected to extend beyond the expiration of the 60-day storage period (see Enclosure 1). Therefore, based on what is presently known, the 60-day storage time limit for CH TRU mixed waste in Permit Part 3, Section 3.1.1.7. in all likelihood will be exceeded without taking action.

Third, once the NRC venting date has been reached, in order to unload the waste that is currently in the Parking Area Unit and place it into storage in the WHB will require the use of Surge Storage. However, the Permit does not allow the use of Surge Storage unless the Parking Area Unit is full.

Fourth, the volume of waste currently in storage in the WHB and the Parking Area Unit does not exceed the volume capacity limit for the WHB. However, it will be necessary to exceed the pallet count that is in the Container Equivalent column of Table 3.1.1.

Finally, the process of recovery and decontamination of surface facilities such as ventilation ductwork and the exhaust filter building is expected to generate a significant quantity of derived waste. The current estimate is approximately 200 m<sup>3</sup>. This waste will be managed in accordance with large quantity generator requirements.

The only alternative to what we are requesting is to return the waste to the respective generator/storage sites and to manage derived waste outside of the WHB.

The requested extension to the Parking Area Unit and WHB storage times applies to the CH TRU mixed waste that is currently on-site at the facility. A list of the specific containers to which this extension would apply is enclosed with this transmittal.

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We certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with 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. George Basabilvazo at 575-234-7488.

Sincerely,



Jose R. Franco, Manager  
Carlsbad Field Office



M. F. Sharif, Project Manager  
Nuclear Waste Partnership LLC

Enclosure

cc: w/ enclosure

T. Kliphuis, NMED \*ED

T. Blaine, NMED ED

CBFO M&RC

\*ED denotes electronic distribution

**Enclosure 1**  
**CH TRU Mixed Waste in the Parking Area Unit and Waste Handling Building at the WIPP Facility**

Shipment	Received	ICV Closed	PAU Deadline	Venting Deadline	WHB Deadline	Package	Location
SR314012	1/31/2014 16:10	1/27/2014 10:48	3/2/2014 16:10	3/27/2014 10:48	Not Processed	4	PAU
SR314013	2/1/2014 15:15	1/28/2014 10:40	3/3/2014 15:15	3/28/2014 10:40	Not Processed	6	PAU
SR314014	2/4/2014 13:15	1/30/2014 10:30	3/6/2014 13:15	3/30/2014 10:30	Not Processed	1	PAU
IN140043	2/5/2014 0:30	2/1/2014 11:35	3/7/2014 0:30	4/1/2014 11:35	Not Processed	163	PAU
IN140043	2/5/2014 0:30	2/1/2014 11:35	3/7/2014 0:30	4/1/2014 11:35	Not Processed	163	PAU
IN140043	2/5/2014 0:30	2/1/2014 11:40	3/7/2014 0:30	4/1/2014 11:40	Not Processed	501	PAU
IN140042	2/5/2014 0:34	2/1/2014 11:45	3/7/2014 0:34	4/1/2014 11:45	Not Processed	515	PAU
IN140042	2/5/2014 0:34	2/1/2014 11:50	3/7/2014 0:34	4/1/2014 11:50	Not Processed	136	PAU
IN140042	2/5/2014 0:34	2/1/2014 11:50	3/7/2014 0:34	4/1/2014 11:50	Not Processed	136	PAU
IN140042	2/5/2014 0:34	2/1/2014 11:55	3/7/2014 0:34	4/1/2014 11:55	Not Processed	132	PAU
IN140042	2/5/2014 0:34	2/1/2014 11:55	3/7/2014 0:34	4/1/2014 11:55	Not Processed	132	PAU
SR140005	2/5/2014 13:00	1/31/2014 12:23	3/7/2014 13:00	3/31/2014 12:23	Not Processed	160	PAU
SR140005	2/5/2014 13:00	1/31/2014 12:23	3/7/2014 13:00	3/31/2014 12:23	Not Processed	160	PAU
SR140005	2/5/2014 13:00	1/31/2014 12:29	3/7/2014 13:00	3/31/2014 12:29	Not Processed	155	PAU
SR140005	2/5/2014 13:00	1/31/2014 12:29	3/7/2014 13:00	3/31/2014 12:29	Not Processed	155	PAU
SR140005	2/5/2014 13:00	1/31/2014 12:34	3/7/2014 13:00	3/31/2014 12:34	Not Processed	135	PAU
SR140005	2/5/2014 13:00	1/31/2014 12:34	3/7/2014 13:00	3/31/2014 12:34	Not Processed	135	PAU
IN140044	2/6/2014 1:09	2/3/2014 13:49	3/8/2014 1:09	4/3/2014 13:49	Not Processed	512	PAU
IN140045	2/6/2014 1:27	2/3/2014 13:48	3/8/2014 1:27	4/3/2014 13:48	Not Processed	508	PAU
SR140003	1/24/2014 12:40	1/16/2014 8:45	N/A	Vented	4/2/2014 8:15	169	Pallet
SR140003	1/24/2014 12:40	1/16/2014 8:45	N/A	Vented	4/2/2014 8:15	169	Pallet
SR140003	1/24/2014 12:40	1/16/2014 8:45	N/A	Vented	4/2/2014 8:32	195	Pallet
SR140003	1/24/2014 12:40	1/16/2014 8:40	N/A	Vented	4/2/2014 8:34	195	Pallet
LA140018	2/1/2014 1:30	1/29/2014 14:25	N/A	Vented	4/2/2014 12:40	172	Pallet
LA140019	2/1/2014 1:50	1/30/2014 15:20	N/A	Vented	4/2/2014 14:25	127	Pallet
LA140019	2/1/2014 1:50	1/30/2014 15:20	N/A	Vented	4/2/2014 14:26	127	Pallet

Shipment	Received	ICV Closed	PAU Deadline	Venting Deadline	WHB Deadline	Package	Location
IN140037	2/1/2014 21:11	1/30/2014 14:00	N/A	Vented	4/3/2014 10:17	166	Pallet
IN140037	2/1/2014 21:11	1/30/2014 14:03	N/A	Vented	4/3/2014 10:24	168	Pallet
SR314011	1/28/2014 14:10	1/22/2014 8:30	N/A	Vented	4/4/2014 12:14	3	Pallet
IN140036	2/1/2014 22:40	1/25/2014 13:35	N/A	Vented	4/4/2014 13:15	210	Pallet
IN140036	2/1/2014 22:40	1/25/2014 13:35	N/A	Vented	4/4/2014 13:15	210	Pallet
IN140041	2/3/2014 7:13	1/31/2014 13:30	N/A	Vented	4/4/2014 14:37	509	Pallet
IN140040	2/3/2014 0:17	1/31/2014 13:21	N/A	Vented	4/5/2014 9:04	186	Pallet
IN140041	2/3/2014 7:13	1/31/2014 13:40	N/A	Vented	4/5/2014 9:31	125	Pallet
IN140041	2/3/2014 7:13	1/31/2014 13:35	N/A	Vented	4/5/2014 9:37	203	Pallet
IN140040	2/3/2014 0:17	1/31/2014 13:13	N/A	Vented	4/5/2014 12:22	505	Pallet
IN140040	2/3/2014 0:17	1/31/2014 13:16	N/A	Vented	4/5/2014 12:55	208	Pallet
SR140004	2/1/2014 15:45	1/23/2014 10:40	N/A	Vented	4/5/2014 13:51	193	Pallet
SR140004	2/1/2014 15:45	1/23/2014 10:40	N/A	Vented	4/5/2014 13:52	193	Pallet
LA140020	2/3/2014 22:34	2/3/2014 10:00	N/A	Vented	4/5/2014 16:38	190	Pallet
LA140020	2/3/2014 22:34	2/3/2014 10:05	N/A	Vented	4/5/2014 16:44	126	Pallet
SR140004	2/1/2014 15:45	1/23/2014 10:30	N/A	Vented	4/5/2014 17:50	162	Pallet
SR140004	2/1/2014 15:45	1/23/2014 10:30	N/A	Vented	4/5/2014 17:51	162	Pallet
SR140004	2/1/2014 15:45	1/23/2014 10:35	N/A	Vented	4/5/2014 17:51	201	Pallet
SR140004	2/1/2014 15:45	1/23/2014 10:35	N/A	Vented	4/5/2014 17:52	201	Pallet
LA140020	2/3/2014 22:34	2/3/2014 10:15	N/A	Vented	4/6/2014 8:34	156	Pallet
LA140020	2/3/2014 22:34	2/3/2014 10:15	N/A	Vented	4/6/2014 8:36	156	Pallet
LA140021	2/4/2014 22:40	2/4/2014 9:35	N/A	Vented	4/6/2014 9:12	133	Pallet
LA140021	2/4/2014 22:40	2/4/2014 9:35	N/A	Vented	4/6/2014 9:13	133	Pallet
LA140021	2/4/2014 22:40	2/4/2014 9:25	N/A	Vented	4/6/2014 9:32	147	Pallet
IN140043	2/5/2014 0:30	2/1/2014 11:30	N/A	Vented	4/12/2014 9:12	191	Pallet
IN140043	2/5/2014 0:30	2/1/2014 11:30	N/A	Vented	4/12/2014 9:13	191	Pallet
LA140021	2/4/2014 22:40	2/4/2014 9:30	N/A	Vented	4/12/2014 9:13	137	Pallet
IN140044	2/6/2014 1:09	2/3/2014 13:55	N/A	Vented	4/12/2014 10:00	181	SW TRUDOCK

Shipment	Received	ICV Closed	PAU Deadline	Venting Deadline	WHB Deadline	Package	Location
IN140044	2/6/2014 1:09	2/3/2014 13:52	N/A	Vented	4/12/2014 10:43	202	SE TRUDOCK
IN140045	2/6/2014 1:27	2/3/2014 13:44	N/A	Vented	4/12/2014 11:00	167	NE TRUDOCK
IN140045	2/6/2014 1:27	2/3/2014 13:40	N/A	Vented	4/12/2014 11:02	142	NW TRUDOCK

19 Shipments

Last CH Emplacement: 02/05/2014 02:02 PM