

SNL FFCO 06



National Nuclear Security Administration

Sandia Site Office  
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FEB 28 2006



Mr. William P. Moats, FFCO Project Manager  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505

Subject: Proposed Revision No. 10 for the Site Treatment Plan (STP) for Mixed Waste, Compliance Plan Volume (CPV) of the Federal Facility Compliance Order (FFCO) for Sandia National Laboratories, New Mexico (SNL/NM)

Dear Mr. Moats:

The purpose of this letter is to submit our request for a revision to the STP CPV for SNL/NM. The revision request has been prepared for the New Mexico Environment Department (NMED) by the Department of Energy (DOE) and Sandia Corporation (Sandia), in accordance with the requirements of Section X. C (Revisions), of the FFCO, as revised and amended. This is proposed Revision No. 10.

In accordance with Section X.B of the FFCO, a revision is required when there is an increase in volume in excess of 10% or greater than one cubic meter in a treatability group in the Order, whichever is greater (Section X.B.4). Proposed Revision No. 10 will add a total of 2.9 cubic meters (m<sup>3</sup>) to the STP inventory. This requested change to waste inventory volumes will have a negligible impact on the total volumes of waste stored, treated, or disposed of in FY 2006, will not cause an impact to the environment or public health, and will allow the DOE and Sandia to realize significant positive impacts on the operational effectiveness of mixed waste treatment and disposal. The requested volume increases are detailed in Enclosure A to this letter.

Additionally, the DOE and Sandia would like to remove specific compliance activities that were modified and approved in Revision No. 9.0. These specific compliance activities were completed to meet the compliance date of September 30, 2005, and no longer apply to the current STP waste inventory. The removal of these compliance activities is for clarification purposes only and does not impact or change upcoming activities or compliance requirements. The following table indicates the compliance activities removed:

Section	Compliance Activity Removed	Justification
3.1.1.2.B	"B. For existing mixed waste identified as of September 30, 2004, complete recycling/treatment to	Applicable waste was shipped off-site or treated on-site as noted in the "Notification of Completion of

Section	Compliance Activity Removed	Justification
	applicable regulatory standards or shipment to an off-site treatment/recycling facility," by September 30, 2005	Compliance Activity Milestones", submitted to the NMED on October 6, 2005.
3.1.1.7.D.1	"D.1 Complete recycling/treatment of existing TG 13 (Oxidizer) volume identified as of September 30, 2004, to applicable regulatory standards and," by September 30, 2005	Applicable waste was treated on-site as noted in the "Notification of Completion of Compliance Activity Milestones", submitted to the NMED on October 6, 2005.
3.1.1.11.A	"A. Complete treatment to applicable regulatory standards or shipping of existing wastes identified as of September 30, 2004, to an off-site treatment/recycling facility" by September 30, 2005	Applicable waste was shipped off-site or treated on-site as noted in the "Notification of Completion of Compliance Activity Milestones", submitted to the NMED on October 6, 2005.

The proposed revision, with information required by the FFCO, Section X. C (Revisions) and Section VIII (Addition of New Covered Waste), is provided in Enclosure A to this letter. The proposed changes to the CPV are provided in Enclosure B, as redline/strikeout, for the NMED's review, comment, and approval. A clean copy of the proposed Revision 10, reflecting the requested changes, is included as Enclosure C. An electronic copy of the proposed CPV text is also provided in both redline/strikeout and clean versions.

As required by the Order, Part XX, "Documents, Information, and Reporting Requirements," Section D, "Certification Statements," the appropriate certification is also provided. If you have any questions regarding this submittal please feel free to contact David Rast at 845-5349.

Sincerely,



David Rast  
STP Project Manager  
DOE/Sandia Site Office

Sincerely,



James J. Thompson  
STP Project Manager  
Sandia National Laboratories, New Mexico

Enclosure

cc:

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