

From: Allen, Don

Sent: Wednesday, August 13, 2014 3:41 PM

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Subject: Daily Technical Submission - August 13, 2014

Folks,

Attached is the written daily technical submission for today. The Permittees are submitting this pursuant to: Section 19 of the May 19, 2014, *Administrative Order*; the July 10, 2014 letter from NMED regarding *Modification to 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.

Thank you

Don Allen for Tori George

NMED / LANL Technical Summary

August 13, 2014

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.
 - One hourly visual inspection missed due to a spurious fire alarm and LAFD response.
- **Additional measures currently underway**
 - As a conservative measure, LANL is currently conducting additional monitoring. This additional monitoring includes:
 - Container 68685.
 - Collecting a daily head space gas sample.
 - CO₂, H₂ and N₂O - continuing analytical.
 - LANL also continuing *solid phase micro-extraction*.
 - Hourly temperature measurements.
 - Temperatures remain below 90°F.
 - Other SWB overpacks (containing 55-gallon drums of remediated nitrate salt-bearing waste).
 - Collecting a daily head space gas sample.
 - CO₂, H₂ and N₂O - continuing analytical.
 - 1 of these SWBs (SB50522) – LANL will also:
 - Continue *solid phase micro-extraction*.
 - Continue hourly temperature measurements.
 - LANL plans to conduct head space gas sampling on each of the 55 SWBs that contain 55-gallon drums of remediated nitrate salt-bearing waste.
 - LANL conducted head space gas sampling of all 55 SWBs in the 375 Permacon.

- **Anticipated Changes to Nitrate Salt-Bearing Waste Containers (e.g. movement, re-packaging).**
 - Currently, no further movements or re-packaging are planned.
- **Other**
 - Sampling empty parent container.
 - Empty parent container 69120 sampled on 8/7/14. Note: Original parent ID #S855793 was renumbered to 69120 when empty.
 - During sampling, the operator removing the TID on empty container 69120 was not a qualified TID custodian as required by the TID User Manual. However, chain of custody was maintained and observers verified that the process for removing the TID was completed in accordance with the TID User Manual.

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	---	Complete June 9, 2014
3.	On upcoming daily call, provide additional discussion on the potential for liquids in the 350 post-1991 cemented containers (including a discussion of the review of RTR tapes).	LANL	---	Complete July 6, 2014 (Discussion on call) July 18, 2014 (Meeting held)
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	---	Complete June 5, 2014
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
6.	Provide LANL procedures and example records associated with post-1991 TA-55 cementation process discussed on June 6.	LANL	---	Complete July 3, 2014
7.	Provide information on numbers of containers in the post-1991 cemented waste streams from the TA-55 process discussed on June 6. This should include numbers regarding RTR status	LANL	---	Complete June 17, 2014 (Supplemental Info)

	(RTR'd, meet WIPP criteria, requiring remediation).			provided July 3)
8.	Provide RTR video and pre-screening information associated with those containers requiring remediation from the post-1991 cemented waste streams from the TA-55 process discussed on June 6.	LANL	---	Complete July 3, 2014
9.	Provide copy of CCP/LANL Interface Document.	LANL	---	Complete June 9, 2014
10.	Provide a list of the analytes for which LANL is sampling HSG (CO ₂ and LFL analytes).	LANL	---	Complete June 11, 2014
11.	Discuss potential sampling of HSG for NO _x .	LANL	---	Complete June 16, 2014
12.	Follow-up with Tim Hall regarding LANL Hazardous Waste Facility Permit and procedures that LANL is developing for possible future sampling of empty parent containers and unremediated nitrate salt-bearing containers at LANL.	LANL	Unremediated Parent In progress – will include information on sampling of S802701 and S813389 (occurred before the May 19 Administrative Order) in next technical meeting (August 14).	Empty Parent Complete June 16, 2014
13.	Respond to NMED email request for information associated with the nitrate salt-bearing parent and daughter waste containers. WIPP Recovery Daily Meeting Action List item #84 – NMED requested a copy of the LANL remediation records for waste stored in Panel 6 (Trais Kliphuis) – is a subset of the information in item 5 of this action.	LANL	In progress – remaining items are portions of items 2, 5 and 8. Items #2 and #8 are in signature.	Partially Complete July 9, 2014 (Letter sent addressing items 1-4 and 6-9 of the email request) July 17, 2014 (Letter sent with updated spreadsheet.) August 7, 2014 First submittal in response to item 5 sent to NMED.
14.	NMED will review the Round Sheets (provided in June 11 summary) and inform LANL if these should be attachments to the Revised Plan, or if they fall under the provision in Section I of the Revised Isolation Plan and their identification during this technical call is sufficient.	NMED	NMED has reviewed Round Sheets – no comments / direction at this time. NMED will address any comments in their formal response to Revised Container Isolation Plan.	Complete June 23, 2014
15.	NMED has requested ‘copies of any waste processing, treatment, characterization stop orders issued since Feb 14, 2014.’	LANL	---	Complete June 13, 2014 (Included w/ daily summary)

				June 16, 2014 (Discussed current TA-54 & WCRRF operations)
16.	NMED requested information on the location of drums 68327 and 68328. Request made June 14.	LANL	---	Complete June 14, 2014
17.	Update on LANL efforts – including LANL teams. (On June 20 call, LANL offered to schedule an update meeting).	LANL / NMED	---	Complete July 2, 2014
18.	Neutralizer use in association with container S855793 (parent of 68660 and 68685).	LANL	---	Complete June 25, 2014
19.	List of nitrate salt-bearing waste containers that LANL records indicate contain absorbed liquids with the same neutralizer, as discussed during June 25 technical call.	LANL	In progress.	
20.	Schedule follow-on update on LANL efforts – including teams.	LANL / NMED	In progress. Meeting scheduled for August 14.	
21.	NMED requested information on document approval / review (as discussed on July 3 call).	LANL	---	Complete July 29, 2014
22.	What analyses will be conducted on samples taken from empty drums that previously contained nitrate salt-bearing waste.	LANL	---	Complete July 7, 2014
23.	NMED requested the following information on cemented waste containers generated from TA-55, that are currently stored above-ground at Area G: container id number; location; form (cans or monoliths); and type of concrete. Additionally, NMED requested information on pH adjustment during waste generation process, and information on anticipated pH of free liquids (and rationale).	LANL	---	Complete July 17, 2014 (Letter sent w/ information) July 18, 2014 (Meeting held)
24.	NMED requested the procedure for sampling empty parent drums that previously contained nitrate salt-bearing waste.	LANL	EP-AREAG-WO-DOP-1245 is included in Enclosure 1 to LANL's July 3, 2014 <i>Response to Request for Information on Management of Waste at LANL.</i>	Complete July 8, 2014
25.	NMED requested an additional discussion on a future technical call regarding CO ₂ , including data.	LANL	In progress. Will include trending information in next technical meeting (August 14).	
26.	NMED requested additional discussion on CIN-01 waste containers and absorbent,	LANL	---	Complete

	including confirmation and extent of use.			July 18, 2014 (Meeting held)
27.	NMED requested historic analytical information on pH of liquids associated with gypsum cemented waste.	LANL	---	Complete August 7, 2014 (Letter sent w/ information)
28.	NMED requested link to pdf of Actinide Quarterly edition (3 rd Q 2008).	LANL	---	Complete July 21, 2014
29.	NMED requested a copy of lessons learned	LANL	---	Complete August 11, 2014
30.	NMED requested a copy of empty drum sampling presentation	LANL	Still in draft	
31.	Respond to NMED email request dated 8/12/2014 for information associated with the nitrate salt-bearing waste containers.	LANL	In Progress	

Next: Thursday, August 14, 2014 technical meeting in lieu of call.