



Environmental Protection & Compliance Division
PO Box 1663, K491
Los Alamos, New Mexico 87545
(505) 667-2211

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87544
(505) 665-7314/Fax (505) 667-5948

Date: MAR 08 2017
Symbol: EPC-DO: 17-117
LA-UR: 17-21644

Locates Action No.:

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

Subject: Request for Extension of Alternative Inspection Requirements for Shed 1028 at Technical Area 54, Area G, Pad 5

Dear Mr. Kieling:

The purpose of this letter is to request the continuation of alternative inspections for waste containers stored at a permitted unit at Technical Area (TA) 54 at the Los Alamos National Laboratory (LANL). Correspondence between the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (the Permittees), and the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) regarding alternative container storage inspections occurred on September 16, 2016; October 13, 2016; November 8, 2016; and December 6, 2016.

These alternative requirements to regularly conduct visual inspections are necessary due to a potential personnel safety concern regarding four mixed low level waste (MLLW) Flanged Tritium Waste Containers (FTWCs) containing tritium contaminated waste items that are stored within TA-54, Building 1028 (TA-54-1028). This extension will allow for the continued visual inspection of TA-54-1028 as described in the letter dated November 8, 2016 (EPC-DO-16-330), rather than inspections of the waste containers themselves in accordance with Permit Section 2.6 of the LANL Hazardous Waste Facility Permit.

Since September 16, 2016, there has been restricted access to TA-54-1028. Inspectors are unable to complete certain requirements of their normal container inspections for containers stored within TA-54-1028. The requirements of Permit Attachment E, *Inspection Plan* include Items 18-22 of the Inspection Record Form requirements. The direct inspection of containers, container lids, labels, compatibility, integrity, and aisle spacing are examples of inspection requirements that cannot be completed at this time.

Although the containers themselves cannot be inspected, the following alternative inspection requirements were proposed and were put in place in order to meet the intent of the Permit requirements:

1. The integrity of the storage shed is inspected.
2. An inspection for evidence of liquids around or under the structure is performed, to the extent possible.
3. A comment is added to the Inspection Record Form to include the date of the last full inspection and to document the integrity of the containers.

The last inspection of TA-54-1028 and the FTWCs was conducted on September 8, 2016 and there were no issues identified within TA-54-1028 or with the integrity of the containers. TA-54-1028 is the only structure within the restricted area that contains waste. Additionally, the only hazardous waste constituent within the FTWC waste containers is lead, which is a minor component of the waste and contained within the waste items and bags in the container. The lead is unlikely to be dispersed from the shed should a release occur. Also, in the event of a fire, explosion, or release of hazardous waste, the Permit Attachment D, *Contingency Plan*, will be implemented pursuant to Permit Section 2.11.1.

The letter dated December 8, 2016 indicated that the Permittees anticipated controlled access within TA-54-1028 to be approved within the current extension timeframe. DOE approval for the Evaluation of the Safety of the Situation (ESS) received on February 13, 2017, indicated that while the ESS establishes that the FTWCs in their current configuration are stable, there is insufficient evidence to authorize an access-control area or to allow the resumption of activities within the proximity of the FTWCs. With a safe situation established, subsequent analysis has continued in order to fully characterize the associated hazards and to provide controls for remediation/recovery of the FTWCs. To date an Integrated Project Team (IPT) has been established to explore options and determine the most appropriate disposition path for the 4 MLLW FTWCs at Area G. The IPT has determined the most appropriate solution for worker safety, environmental protection, and overall long-term risk management will be to mitigate the current hazards and ship the containers offsite for permanent disposition. The hazards analysis and permitting requirements are currently in development. Therefore, with personnel safety as the priority, the Permittees are seeking an additional 365 days to continue with the current alternative inspections as a recovery plan is developed for the waste containers within TA-54-1028. The current controls in place as well as the recovery plan are developed in accordance with the safety requirements mandated by DOE. The Permittees have been and will continue to both analyze and model the integrity of the containers and evaluate options for offsite shipment and mitigation of the four MLLW FTWCs.

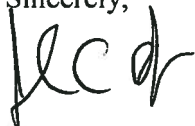
The Permittees will document the efforts to date in a baseline report. The baseline report will be submitted to the NMED-HWB by April 7, 2017. While processes are being developed for mitigation and offsite shipment efforts, and alternative inspections are being conducted, updated reports will be submitted to NMED on quarterly basis. As stated in all previous communications, documentation of these alternative inspections will be included on the Inspection Record Form.

If you have comments/questions or would like to meet regarding this submittal, please contact Mark P. Haagenstad at (505) 665-2014 or Karen Armijo at (505) 665-7314.

Mr. John F. Kieling
EPC-DO: 17-117

- 3 -

Sincerely,



John C. Bretzke
Division Leader

Sincerely,



Karen E. Armijo
Permitting and Compliance Program Manager

JCB/KEA/MPH/TAD:am

Enclosure: Not Applicable

Copy: Neelam Dhawan, NMED/HWB, Santa Fe, NM, (E-File)

Siona Briley, NMED/HWB, Santa Fe, NM, (E-File)

Douglas E. Hintze, EM-LA, (E-File)

Kimberly Davis Lebak, NA-LA, (E-File)

David J. Nickless, EM-WM, (E-File)

Peter Maggiore, NA-LA, (E-File)

Jody M. Pugh, NA-LA, (E-File)

Karen E. Armijo, NA-LA, (E-File)

Jordan Arnsward, NA-LA, (E-File)

Darlene S. Rodriguez, NA-LA, (E-File)

Craig S. Leasure, PADOPS, (E-File)

William R. Mairson, PADOPS, (E-File)

Michael T. Brandt, ADESH, (E-File)

Randall M. Erickson, ADEM, (E-File)

Cheryl D. Cabbil, ADNHHO, (E-File)

Raeanna Sharp-Geiger, ADESH, (E-File)

Enrique Torres, ADEM, (E-File)

David J. Funk, ADEM, (E-File)

Leslie K. Sonnenberg, EWMO-DO, (E-File)

Brian L. Watkins, WFO-DO, (E-File)

Stephanie Q. Griego, EWMO-DO, (E-File)

Mark P. Haagenstad, EPC-CP, (E-File)

Tammy A. Diaz, EPC-CP, (E-File)

Ellena I. Martinez, EPC-CP, (E-File)

Victoria R. Baca, DESHS-EWMS (E-File)

lasomailbox@nnsa.doe.gov, (E-File)

locatsteam@lanl.gov, (E-File)

epc-correspondence@lanl.gov, (E-File)

adesh-records@lanl.gov, (E-File)

rcra-prr@lanl.gov, (E-File)



COPY



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