



COPY



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Date: **JUL 19 2019**

Symbol: EPC-DO: 19-240

LA-UR: 19-26239

Locates Action No.: N/A

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



Subject: Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending July 22, 2019

Dear Mr. Kieling:

This Semi-Annual Report is submitted as required by Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. On November 30, 2018, operations responsibilities at Los Alamos National Laboratory were transferred from LANS to Triad National Security, LLC (Triad), resulting in Triad's assumption of responsibility for SFO compliance.

Many of the Ordered Actions in SFO Attachment A make reference to specific procedures. Wherever procedures are referenced in Attachment A under the column "Documentation to Provide as Evidence of Completion," the following requirement is found:

Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revision.

It was agreed that the Respondents would provide the required document list on January 22 and July 22 of each year. Enclosure 1 lists all procedures revised since they were initially submitted to NMED as part of the Ordered Action responses, along with the revised effective dates. As stated in Attachment A, electronic access to any and all current document revisions will be provided upon NMED request.



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Subject: Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending July 22, 2019

Dear Mr. Kieling:

This Semi-Annual Report is submitted as required by Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. On November 30, 2018, operations responsibilities at Los Alamos National Laboratory were transferred from LANS to Triad National Security, LLC (Triad), resulting in Triad's assumption of responsibility for SFO compliance.

Many of the Ordered Actions in SFO Attachment A make reference to specific procedures. Wherever procedures are referenced in Attachment A under the column "Documentation to Provide as Evidence of Completion," the following requirement is found:

Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revision.

It was agreed that the Respondents would provide the required document list on January 22 and July 22 of each year. Enclosure 1 lists all procedures revised since they were initially submitted to NMED as part of the Ordered Action responses, along with the revised effective dates. As stated in Attachment A, electronic access to any and all current document revisions will be provided upon NMED request.

Send to: Mr. John E. Kieling
EPC-DO: 19-240

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If you have comments or questions regarding this submittal, please contact Patrick L. Padilla (Triad) at (505) 667-3932 or Karen Armijo (NA-LA) at (505) 665-7314.

Sincerely,



Enrique Torres
Division Leader
Environmental Protection and Compliance Division
Triad National Security, LLC

Sincerely,



William S. Goodrum
Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

ET/WSG/PLP:sdg

Enclosure: 1) Attachment A Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending July 22, 2019

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

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my 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 my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Enrique Torres
Division Leader
Environmental Protection and Compliance Division
Triad National Security, LLC

7/15/19

Date Signed



William S. Goodrum
Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

7-17-19

Date Signed

ENCLOSURE 1

**Attachment A Settlement Agreement and Stipulated Final
Order HWB-14-20, Semi-Annual Report for Period Ending
July 22, 2019**

EPC-DO: 19-240

LA-UR-19-26239

Date: JUL 19 2019

Enclosure 1

Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending July 22, 2019

List of Documents in SFO Attachment A Subject to the Semi-annual Reporting Requirement

Action required (per SFO Attachment A):

“Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revisions.

When due:

January 22 and July 22 of each year until requirement expires.

List of Documents Affected:

| Document Title | Version Submitted With 3/22/2016 Ordered Action | Revisions and Effective Date* Since Submittal |
|---|---|--|
| Ordered Action 1.12 | | |
| ENV-CP-QP-115, <i>Compliance Technical Assistance Program (CTAP) Procedure</i> ; replaced by EPC-WMP-QP-115, R0 | R0, 09/28/2015 | Document Cancelled 10/10/2017; Replacement, R0 effective 12/04/2018 |
| ADESH-AP-TOOL-803, <i>Facility TSF Operating Record</i> | R0, 12/15/2015 | R1, 08/11/17 |
| EWMO-AP-20284, <i>EWMO RCRA Permit Operating Record and Compliance Programs</i> ¹ | R0, 03/08/2016 | Newport News Nuclear BWXT-Los Alamos, LLC (N3B) Blue sheet: R0, 04/30/2018; Cancelled 09/06/2018 |

* “None” indicates that this document has not been revised since the initial response to Ordered Actions March 22, 2016.

¹ Newport News Nuclear BWXT-Los Alamos, LLC (N3B), assumed Environmental Management (DOE-EM) scope of work at LANL. The list contained herein reflects the documents subject to the SFO semi-annual reporting requirements and the status of those procedures under Triad National Security, LLC.

| Document Title | Version Submitted With 3/22/2016 Ordered Action | Revisions and Effective Date* Since Submittal |
|--|---|--|
| Ordered Action 1.13 | | |
| ADESH-AP-TOOL-117, <i>Using WCATS to Submit Change Requests</i> . Revision 1 changed document title to <i>Managing Operating Record Changes in WCATS</i> | R0, 02/08/2016 | R1, 04/12/2019 |
| Ordered Action 1.14 | | |
| ENV-CP-AP-200, <i>Regulatory Procedure Review of Waste Management Procedures</i> superseded by ADESH-AP-014, <i>Regulatory Review of Waste Management Compliance Work Control Documents</i> | R1, 09/15/2015 | R0, 11/02/2017 |
| Ordered Action 1.16 | | |
| P850, Subcontract Technical Representative Procedure | Not submitted | R6, 11/7/2016; R6, Admin. Change 1, 11/01/2018 |
| Ordered Action 5 | | |
| MAN-5004, <i>WCATS User's Manual</i> | R3, 07/16/2015 | R4, 10/31/2017; Beta-Test Version of On-line Manual posted to LANL Yellow Network 08/06/2018, upon full release will replace MAN-5004, R4 |
| WM-SVS-AP-201, <i>Reviewing and Approving Waste Stream Profiles (WSPs) in WCATS</i> . Revision 1 changed document title to <i>Reviewing and Approving Waste Stream Profiles (WSP) in WCATS by RCRA Reviewers</i> | R0, 04/30/2015 | R1, 11/28/2018 |

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| Document Title | Version Submitted With 3/22/2016 Ordered Action | Revisions and Effective Date* Since Submittal |
|---|---|--|
| Ordered Action 9 | | |
| P409, <i>LANL Waste Management</i> | R5, 07/30/2015 | R6, 04/21/2017; R7, 11/29/2017; R7 Admin Change 1, 04/11/2018; R7 Admin Change 2, 07/26/2018; R7 Admin Change 3, 11/01/2018; R7 Admin Change 4, 04/11/2019 |
| P315, <i>Conduct of Operations Manual</i> | R6, 07/08/2015 | R6, Admin Change 1, 06/13/2017; R7, 05/09/2018; R7 Admin Change 1, 06/11/2018; R7 PROVISIONAL, 05/09/2018; R7, Admin Change 1 (R7 changed from Provisional to Effective), 06/11/2018; R7 Admin Change 2, 07/23/2018; R7 Admin Change 3, 11/01/2018 |

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| Document Title | Version Submitted With 3/22/2016 Ordered Action | Revisions and Effective Date* Since Submittal |
|--|---|--|
| Ordered Action 9 Continued | | |
| EP-AP-10007, <i>ADEP Technical Procedure Development</i> . Document title revised in N3B Blue sheet process to <i>Technical Procedure Development</i> ¹ | R0, 08/13/2015 | R2, 11/21/2016; R2.1 07/11/2017; N3B Blue sheet: R 2.1, 07/11/2017; Cancelled 04/30/2018 |
| ENV-CP-AP-200, R1, <i>Regulatory Procedure Review of Waste Management Procedures</i> superseded by ADESH-AP-014, <i>Regulatory Review for Waste Management Compliance Work Control Documents</i> | R1, 09/15/2015 | R0, 11/02/2017 |
| EM-AP-10001, <i>ADEP Document Control</i> (Rev. 0, formerly EP-AP-10001). Document title revised in N3B Blue sheet process to <i>Document Control</i> ¹ | R0, 08/13/2015 | R1, 02/01/2017; N3B Blue sheet: R1, 02/01/2017; Cancelled 04/30/2018 |
| WM-AP-0005, <i>Waste Characterization and Processing Review</i> | R1, 02/18/2016 | None |
| ADESH-IG-TOOL-101, <i>Waste Management Glossary</i> | R0, 12/10/2015 | R1, 02/26/2019 |
| ADESH-AP-TOOL-111, <i>Waste Characterization</i> | R0, 12/15/2015 | R1, 08/2/2018 |
| ADESH-AP-TOOL-115, <i>Waste Compatibility Determination</i> | R0, 01/14/2016 | R1, 02/01/2018 |

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| Document Title | Version Submitted With 3/22/2016 Ordered Action | Revisions and Effective Date* Since Submittal |
|--|--|--|
| Ordered Action 9 Continued | | |
| ADESH-AP-TOOL-206, <i>Management of Hazardous Waste by Generators</i> | R0, 12/15/2015 | R1, 08/02/2018; R2, 04/12/2019 |
| ADESH-AP-TOOL-300, <i>Radioactive Waste Management</i> | R0, 02/08/2016 | R1, 06/12/2017 |
| ADESH-AP-TOOL-314, <i>Radioactive Waste Characterization</i> | R0, 02/10/2016 | R1, 06/28/2018 |
| ADESH-AP-TOOL-803, <i>Facility TSF Operating Record</i> | R0, 12/15/2015 | R1, 08/11/2017 |
| ADESH-AP-TOOL-810, <i>Waste Processing at LANL Hazardous Waste Permitted Units</i> | R0, 01/14/2016 | R1, 01/29/2019 |
| ADESH-AP-TOOL-901, <i>Elementary Neutralization</i> | R0, 01/14/2016 | R1, 02/26/2019 |
| ADESH-AP-TOOL-902, <i>Sorption without a Permit</i> | R0, 12/23/2015 | R1, 02/26/2019 |
| ADESH-AP-TOOL-906, <i>Treatment by the Waste Generator</i> | R0, 02/24/2016 | R1, 03/13/2019 |

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