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ESHID-603557

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

National Nuclear Security Administration
Los Alamos Field Office
3747 West Jemez Road, A316
Los Alamos, New Mexico 87544
(505) 667-5105/Fax (505) 667-5948

Date: JAN 22 2020

Symbol: EPC-DO: 20-007

LA-UR: 20-20223

Locates Action No.: N/A



Mr. Kevin Pierard
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 January 22, 2020

Dear Mr. Pierard:

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. Kevin Pierard
EPC-DO: 20-007

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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,



Jennifer E. Payne
Division Leader
Environmental Protection and Compliance Division
Triad National Security, LLC
Los Alamos National Laboratory

Sincerely,



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

JEP/KEA/PLP:sdg

Enclosure: 1) Attachment A Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 22, 2020

Copy: Kevin Pierard, NMED-HWB, Santa Fe, NM, kevin.pierard@state.nm.us
Neelam Dhawan, NMED-HWB, Santa Fe, NM, neelam.dhawan@state.nm.us
Siona Briley, NMED-HWB, Santa Fe, NM, siona.briley@state.nm.us
Elizabeth Lowes, N3B, elizabeth.lowes@em-la.doe.gov
Peter Maggiore, NA-LA, peter.maggiore@nnsa.doe.gov
Jody M. Pugh, NA-LA, jody.pugh@nnsa.doe.gov
Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov
Adrienne L. Nash, NA-LA, adrienne.nash@nnsa.doe.gov
Emily Day, N3B, emily.day@em-la.doe.gov
Enrique Torres, EWP, etorres@lanl.gov
Jennifer E. Payne, EPC-DO, jpayne@lanl.gov
Peter H. Carson, EPC-WMP, pcarson@lanl.gov
Ellena I. Martinez, EPC-WMP, martinez@lanl.gov
Patrick L. Padilla, EPC-WMP, plpadilla@lanl.gov
Shanon D. Goldberg, EPC-WMP, shanon@lanl.gov
adesh-records@lanl.gov
epccorrespondence@lanl.gov
locatesteam@lanl.gov
rcra-prr@lanl.gov

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.



Jennifer E. Payne
Division Leader
Environmental Protection and Compliance Division
Triad National Security, LLC

16 January 2020
Date Signed



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

1/21/2020
Date Signed

ENCLOSURE 1

**Attachment A Settlement Agreement and Stipulated Final
Order HWB-14-20, Semi-Annual Report for Period Ending
January 22, 2020**

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Enclosure 1

Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 22, 2020

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. Title revised in R1 to <i>Compliance Technical Assistance Process (CTAP)</i>	R0, 09/28/2015	Document Cancelled 10/10/2017; Replacement, R0 effective 12/04/2018; R1, 08/27/19
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 was superseded by N3B-AP-20284, R.0, effective 04/30/2018.	R0, 03/08/2016	Newport News Nuclear BWXT-Los Alamos, LLC (N3B) Blue sheet: R0, 04/30/2018 supersedes EWMO-AP-20284.Triad EWMO-AP-20284 R.0 was 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 (N3B), assumed Environmental Management (DOE-EM) scope of work at LANL on April, 30, 2018.

Document: Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 22, 2020

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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; R7, 10/31/19
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

* "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 (N3B), assumed Environmental Management (DOE-EM) scope of work at LANL on April 30, 2018.

Document: Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 22, 2020

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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

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

† Newport News Nuclear BWXT-Los Alamos (N3B), assumed Environmental Management (DOE-EM) scope of work at LANL on April 30, 2018.

Document: Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 22, 2020

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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> was superseded by N3B-AP-ENS-10007. N3B document title revised to <i>Technical Procedure Development</i> ¹	R0, 08/13/2015	R2, 11/21/2016; R2.1 07/11/2017; N3B Blue sheet: R2.1, 07/11/2017; Triad EP-AP-10007 was cancelled 04/30/2018; N3B Blue sheet procedure superseded by N3B-AP-ENS-10007, R.0, effective 09/17/2019
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 (Rev. 0, formerly EP-AP-10001)</i> was superseded by N3B-P311-1. N3B 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, 05/26/2018; Triad EM-AP-10001, R.1 was cancelled 04/30/2018; N3B Blue sheet document superseded by N3B-P311-1, R.0, effective 10/11/2018; N3B-P311-1, R.1, 02/06/2019
WM-AP-0005, <i>Waste Characterization and Processing Review</i> . Document identifier revised to EPC-WMP-AP-005 in R2.	R1, 02/18/2016	R2, 10/16/19
ADESH-IG-TOOL-101, <i>Waste Management Glossary</i>	R0, 12/10/2015	R1, 02/26/2019

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

¹ Newport News Nuclear BWXT-Los Alamos (N3B), assumed Environmental Management (DOE-EM) scope of work at LANL on April 30, 2018.

Document: Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 22, 2020

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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
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

* "None" indicates that this document has not been revised the initial response to Ordered Actions March 22, 2016.
¹ Newport News Nuclear BWXT-Los Alamos (N3B), assumed Environmental Management (DOE-EM) scope of work at LANL on April 30, 2018.

