



Department of Energy
Carlsbad Field Office
P. O. Box 3090
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NOV 21 2011

Mr. John Kieling, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Notification of Class 1 Permit Modifications to the Hazardous Waste Facility Permit,
Number: NM4890139088-TSDF

Dear Mr. Kieling:

Enclosed are the following Class 1 Permit Modification Notifications:

- Editorial Correction to change Panel 7 to Panel 8
- Revise Language for Bulkhead Flashing
- Revise Figure N-1
- Revise Transmittal Language to include Electronic Transmittals
- Revise Terminology for Remote-Handled Emplacement Equipment
- Revise C6 Checklist Items
- Add an Option for Ambulance #2
- Revise Document Numbers of Procedures

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

If you have any questions, please contact Ms. Susan McCauslin at (575) 234-7349.

Sincerely,

Edward Ziemianski, Interim Manager
Carlsbad Field Office

M. F. Sharif, General Manager
Washington TRU Solutions LLC

Enclosure

cc: w/enclosure

T. Hall, NMED *ED

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CBFO M&RC

*ED denotes electronic distribution

Class 1 Permit Modification Notifications

Editorial Correction to change Panel 7 to Panel 8

Revise Language for Bulkhead Flashing

Revise Figure N-1

Revise Transmittal Language to include Electronic Transmittals

Revise Terminology for Remote-Handled Emplacement Equipment

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Add an Option for Ambulance #2

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Waste Isolation Pilot Plant

Carlsbad, New Mexico

WIPP Permit Number - NM4890139088-TSDF

November 2011

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Overview of the Permit Modification Notifications

This document contains Class 1 Permit Modification Notifications (**PMNs**) to modify the Hazardous Waste Facility Permit (**Permit**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF hereinafter referred to as the Permit.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Washington TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with Permit Part 1.3.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (40 **CFR**) §270.42(a)). The PMNs in this document are necessary to notify the New Mexico Environment Department (**NMED**) of a change which impacts the WIPP facility. This change does not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the Permit and any related supporting documents are provided in these PMNs. The proposed modifications to the text of the Permit have been identified using **red** text and double underline and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by *italicized* text.

Attachment A
Description of the Class 1 Permit Modification Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notification

Affected Permit Section	Change Description	Category	Attachment A Page #
1. Attachment A2, Section A2-2a(3)	This modification will change the reference from Panel 7 to Panel 8 in Attachment A2-2a(3). This change was inadvertently left out during the Permit renewal process.	A.1	A-5
2. Attachment A2, Section A2-2a(3) Attachment N, Section N1-2	This modification will revise Permit language in Attachment A2, Section A2-2a(3) and Attachment N1, Section N1-2 to allow operational flexibility in the type of material used as bulkhead flashing.	A.1	A-7
3. Attachment N, Figure N-1	This modification will change the location of VOC-B since waste disposal activities have been completed in Panel 5 and the commencement of waste disposal activities in Panel 6 has begun.	A.3	A-9
4. Permit Part 1, Condition 1.10.1.	This modification will add an option for all Permit-required reports and correspondence between the Permittees and the NMED to be submitted by electronic transmittal as an equivalent delivery method in addition to certified mail or hand-delivery.	A.1	A-13
5. Attachment A2, List of Figures Attachment A2, Section A2-2a(4), Section A2-2b, Figure A2-15, Figure A2-15a, Figure A2-17 Attachment E, Section E-1, Table E-1a	Revise Terminology for Remote-Handled Emplacement Equipment in Permit Attachment A2, Sections A2-2a(4), A2-2b, Figure A2-15, Figure A2-17, Attachment E, Section E-1, Table E-1a and add new Figure A2-15a and add new figure number to Attachment A2; List of Figures.	A.3	A-15
6. Attachment C6, Item #1, #32, and #200	Revise three questions in Attachment C6 checklist (Item #1, Item #32, and Item #200). The first change to the C6 Checklist is to revise question #1 to be consistent with the language in Attachment C, Section C-0a. The second change is to revise question #32 to be consistent with the language in Attachment C3, Section C3-10a. The third change is to revise question #200 to be consistent with the language in Attachment C3, Section C3-1b.	A.1	A-29
7. Attachment D, Table D-6	This modification will add an option for the underground Ambulance #2 to be either diesel and/or electric and we have eliminated the term "hardcab" as a hardcab is not necessary to perform the functions that are required in Attachment D, Table D-6.	A.3	A-31
8. Attachment E, Table E-1	This modification will revise document numbers in Attachment E, Table E-1 from PM0000 to WP 12-FP document numbers in Attachment E, Table E-1. The change will affect the following procedures, PM000027 to 12-FP0027, PM000029 to 12-FP0029, PM000030 to 12-FP0030, PM000031 to 12-FP0031, PM000033 to 12-FP0033, PM000034 to 12-FP0034, PM000035 to 12-FP0035 and PM000036 to 12-FP0036. Additionally, a security procedure in	A.1	A-39

Affected Permit Section	Change Description	Category	Attachment A Page #
	Attachment E, Table E-1 will be revised from PF0-008 to PF0-010.		

Item 1

Description

This modification will change the reference from Panel 7 to Panel 8 in Attachment A2-2a(3). This change was inadvertently left out during the Permit renewal process.

Basis

The change is classified as an “administrative and informational change” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

Attachment A2, Section A2-2a(3) needs to be corrected in order to make this section consistent with the rest of the Permit changes made during the Permit renewal process related to Panel 8.

Revised Permit Text

Attachment A2, Section A2-2a(3)

A2-2a(3) Subsurface Structures

Underground Hazardous Waste Disposal Units (HWDUs)

Main entries and cross cuts in the repository provide access and ventilation to the HWDUs. The main entries link the shaft pillar/service area with the TRU mixed waste management area and are separated by pillars. Each of the Underground HWDUs labeled Panels 1 through 78 will have seven rooms. The locations of these HWDUs are shown in Figure A2-1. The rooms will have nominal dimensions of 13 ft (4.0 m) high by 33 ft (10 m) wide by 300 ft (91 m) long and will be supported by 100 ft- (30 m-) wide pillars.

Item 2

Description

This modification will revise Permit language in Attachment A2, Section A2-2a(3) and Attachment N1, Section N1-2 related to the type of material used as bulkhead flashing. Specifically, “rubber or sheet metal” and “rubber conveyer belt” is being changed to “Flexible Flashing”.

Basis

The change is classified as an “equipment replacement or upgrading with functionally equivalent components” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.3).

Discussion

In an effort to continue to improve the ability to block the ventilation to filled rooms in waste panels, this change provides operational flexibility in the material used as the flashing on the bulkheads. In some instances within the Permit the words “flexible flashing” are employed but in other cases the terms are more restrictive such as “rubber or sheet metal” and “rubber conveyer belt”. This change will make the term throughout the Permit used for bulkhead flashing consistent with the term used in the bulkhead definition in Permit Condition 1.5.14.

Revised Permit Text

A2-2a(3) Subsurface Structures

Underground Ventilation System Description

Air will be routed into a panel from the intake side. Air is routed through the individual rooms within a panel using underground bulkheads and air regulators. Bulkheads are constructed by erecting framing of rectangular steel tubing and screwing galvanized sheet metal to the framing. Bulkhead members use telescoping extensions that are attached to framing and the salt which adjust to creep. ~~Rubber or sheet metal~~ Flexible flashing attached to the bulkhead on one side and the salt on the other completes the seal of the ventilation. Where controlled airflow is required, a louver-style damper on a slide-gate (sliding panel) regulator is installed on the bulkhead. Personnel access is available through most bulkheads, and vehicular access is possible through selected bulkheads. Vehicle roll-up doors in the panel areas are not equipped with warning bells or strobe lights since these doors are to be used for limited periodic maintenance activities in the return air path. Flow is also controlled using brattice cloth barricades. These consist of chain link fence that is bolted to the salt and covered with brattice cloth; and are used in instances where the only flow control requirement is to block the air. A brattice cloth air barricade is shown in Figure A2-11. Ventilation will be maintained only in all active rooms within a panel until waste emplacement activities are completed and the panel-closure system is installed. The air will be routed simultaneously through all the active rooms within the panel. The rooms that are filled with waste will be isolated from the ventilation system, while the rooms that are actively being filled will receive a minimum of 35,000 SCFM of air when workers are present to assure worker safety. After all rooms within a panel are filled, the panel will be closed using a closure system described Permit Attachment G and Permit Attachment G1.

N1-2 Parameters to be Analyzed and Monitoring Design

The bulkheads (Figure N1-2) serves to block ventilation at the intake and exhaust of the filled panel and prevent personnel access. The bulkhead is constructed as a typical WIPP bulkhead with no access doors or panels. The bulkhead will consist of a steel member frame covered with galvanized sheet metal, and will not allow personnel access. ~~Rubber conveyor belt~~ Flexible flashing will be used as a gasket to attach the steel frame to the salt, thereby providing an effective yet flexible blockage to ventilation air. Over time, it is possible that the bulkhead may be damaged by creep closure around it. If the damage is such as to indicate a possible loss of functionality, then the bulkhead will be repaired or an additional bulkhead will be constructed outside of the original one.

Item 3

Description

This modification will update Permit Attachment N, Figure N-1 to reflect the location of monitoring station VOC-B since waste disposal activities have been completed in Panel 5 and the commencement of waste disposal activities in Panel 6. This modification also updates Attachment N, Figure N-1 to identify intake and exhaust air within Panel 6 and add an associated legend.

Basis

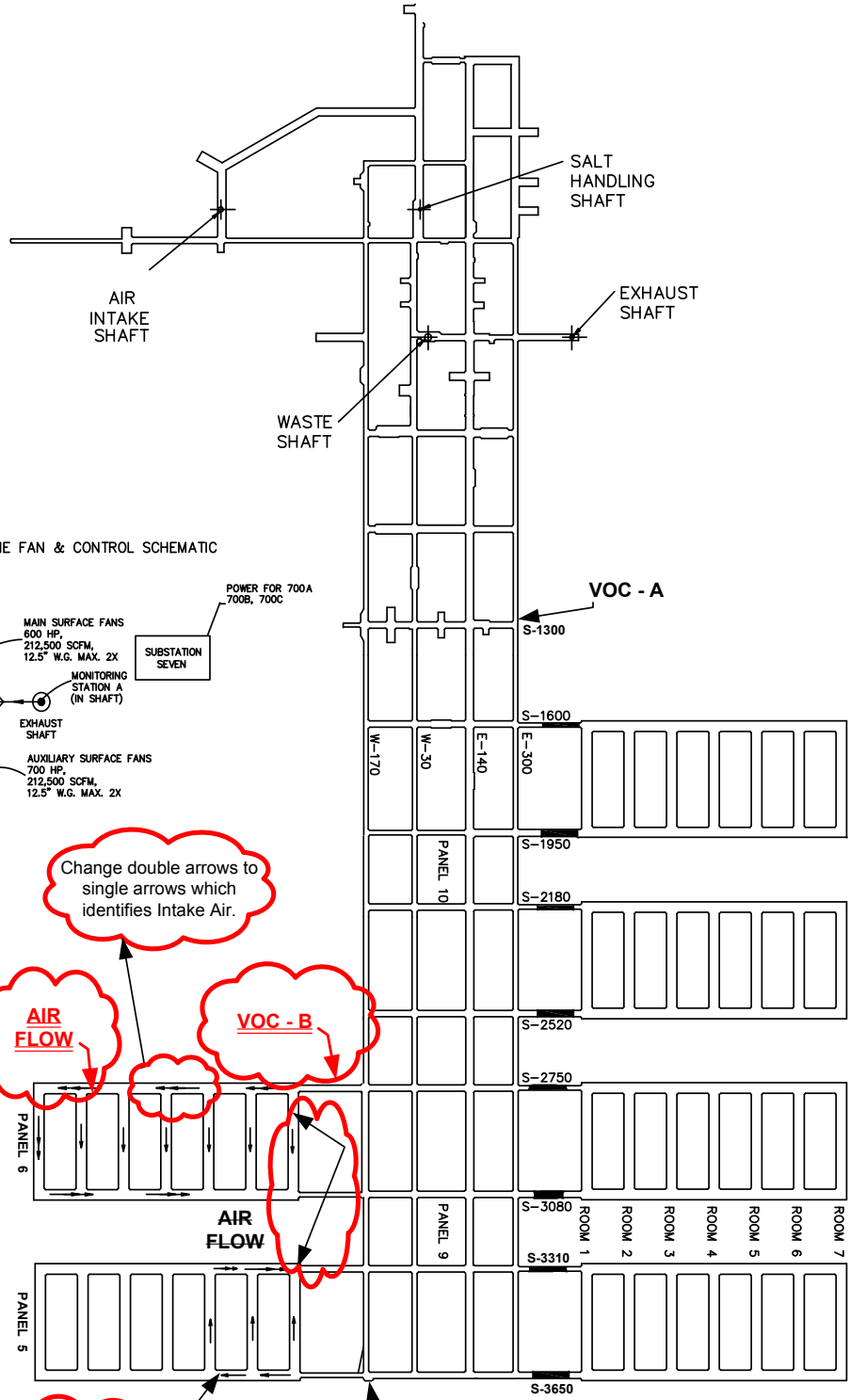
The change is classified as an “administrative and informational change” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

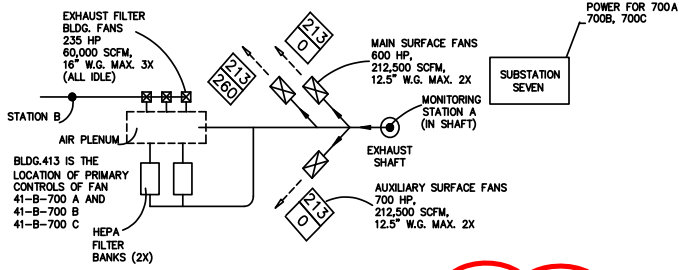
Prior to initiating waste disposal activities in Panel 6, the Permittees relocated VOC-B to be upstream of Panel 6 as required by Permit Attachment N, Section N-3a(1). Attachment N, Figure N-1 shows the location of the VOC Stations. This figure is being updated to reflect the current location of VOC-B. A legend has also been added to Figure N-1 to identify intake air and exhaust air within Panel 6. Both a “clouded” figure showing the changes and a clean figure are attached.

Revised Permit Text

See Attached Figure N-1



SURFACE LOCATED PRIMARY MINE FAN & CONTROL SCHEMATIC

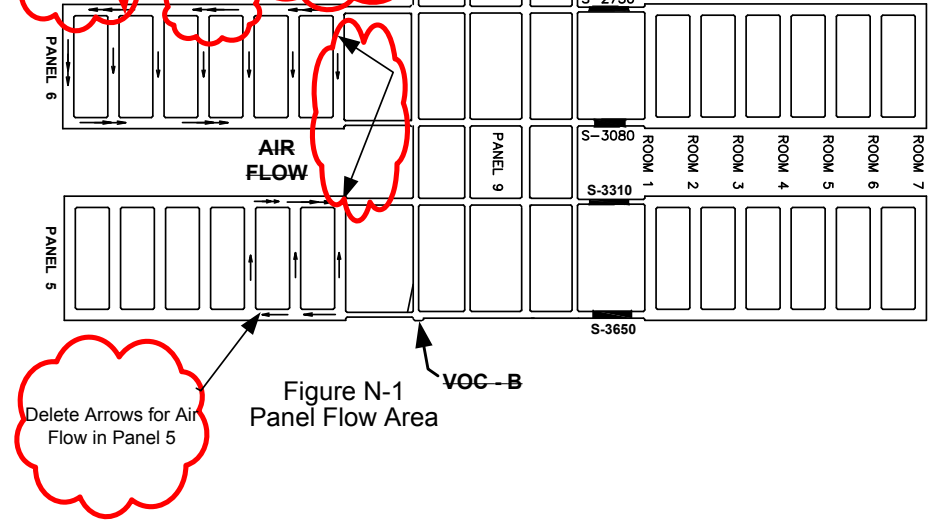


Change double arrows to single arrows which identifies Intake Air.

AIR FLOW

VOC - B

- LEGEND**
- EXHAUST AIR**
 - INTAKE AIR**



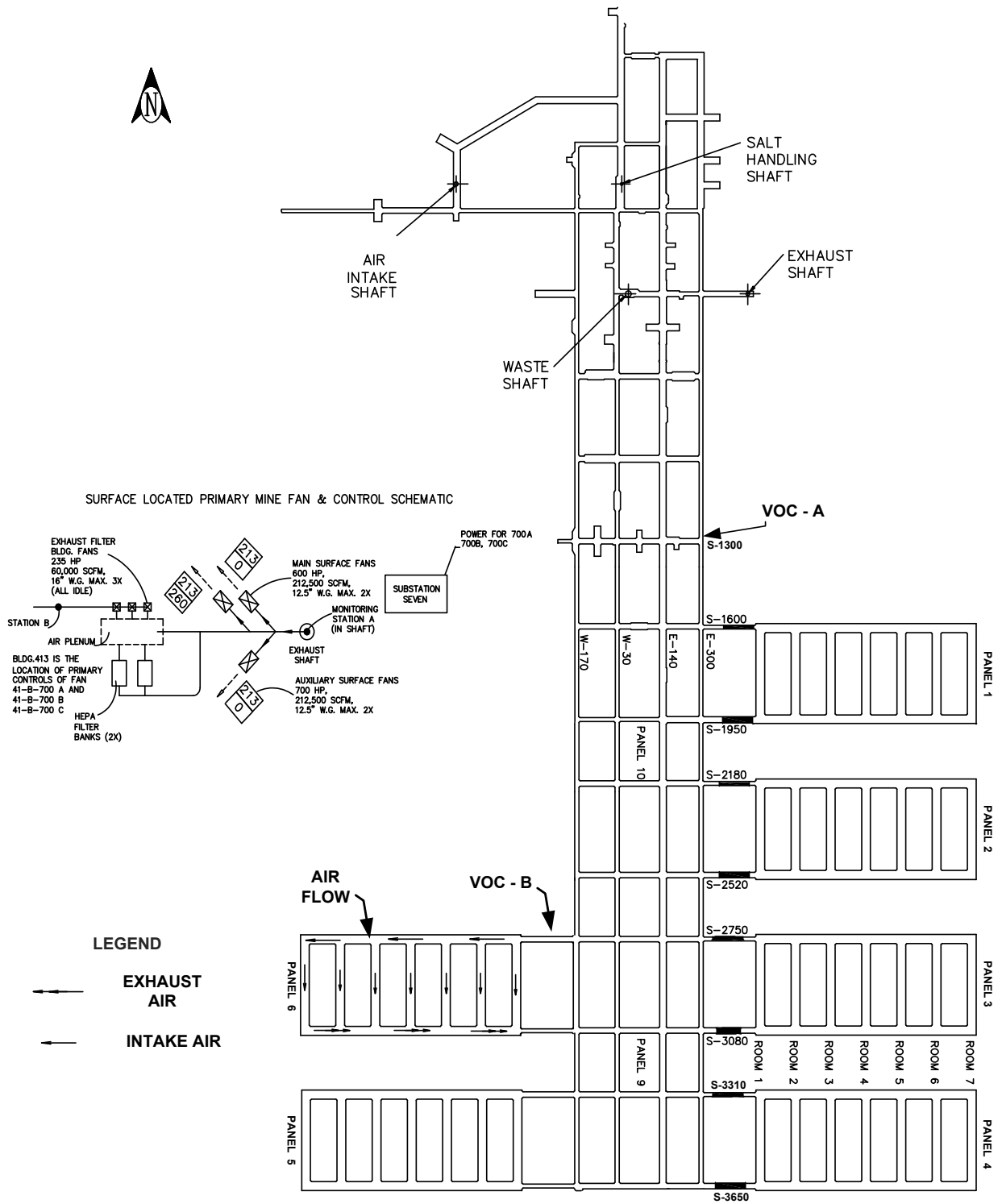


Figure N-1
Panel Flow Area

Item 4

Description

This modification will add an option for all Permit-required reports and correspondence between the Permittees and the NMED to be submitted by electronic transmittal as an equivalent delivery method in addition to certified mail or hand-delivery submittal.

Basis

The change is classified as an “administrative and informational change” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

Permit Part 1, Permit Condition 1.10.1. indicates that “*The Permittees shall submit, by certified mail or hand delivery, all reports, notifications or other submissions which are submitted to or requested by the Secretary or required by this Permit...*”. The Permittees propose to add language in Permit Part 1, Permit Condition 1.10.1. to add the option to also provide the reports, notifications, or other submissions through electronic transmittals. The date of the electronic submittal may be used to meet the required dates for all reports, notifications or other submissions required by the Permit. The Permittees will continue to supply one paper copy of any report, notification or submission by certified mail or hand delivery.

Revised Permit Text

1.10. SUBMITTAL OF REPORTS, NOTIFICATIONS, AND INFORMATION TO THE SECRETARY

1.10.1. Information Submittal

The Permittees shall submit, by certified mail or hand delivery or by electronic transmittal with a subsequent hard copy, all reports, notifications, or other submissions which are submitted to or requested by the Secretary or required by this Permit, to:

Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

Telephone Number: (505) 476-6000

Facsimile Number: (505) 476-6060

Item 5

Description

Revise Terminology for Remote-Handled Emplacement Equipment in Permit Attachment A2, Sections A2-2a(4), A2-2b, Figure A2-15, Figure A2-17, Attachment E, Section E-1, Table E-1a and add new Figure A2-15a and add new figure number to Attachment A2; List of Figures.

Basis

The change is classified as an “Equipment replacement or upgrading with functionally equivalent components” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.3).

Discussion

The Federal Register, Volume 53, Number 188, Page 37925 (September 28, 1988) provided a justification for the use of item A.3 in Appendix I of 40 CFR 270.42. The Federal Register stated *“this will allow the facility to change ancillary equipment without prior approval if the original equipment is no longer made or to take advantage of better designed products so long as the new equipment is functionally equivalent to the equipment replaced.”* Section 20.4.1.900 NMAC (incorporating 40 CFR 270.2) defines “functionally equivalent component” as “a component which performs the same function or measurement and which meets or exceeds the performance specification of another component.”

The Permittees propose a generic term for the remote-handled (RH) emplacement equipment hereinafter referred to as emplacement equipment. The Permittees plan on purchasing new emplacement equipment that will have the same functionality as the current horizontal emplacement and retrieval equipment (HERE) but will be designed to have fewer pinch points, incorporate current technology, be built with commercially available parts and have spare parts commercially available. A new figure (Figure A2-15a) has been added to the Permit. The current HERE is outdated and parts are difficult to obtain and, in some cases, must be specifically manufactured for the HERE.

Revised Permit Text

List of Tables

Table	Title
Table A2-1	CH TRU Mixed Waste Handling Equipment Capacities
Table A2-2	Instrumentation Used in Support of the Geomechanical Monitoring System
Table A2-3	RH TRU Mixed Waste Handling Equipment Capacities

List of Figures

Figure	Title
Figure A2-1	Repository Horizon
Figure A2-2	Spatial View of the Miscellaneous Unit and Waste Handling Facility
Figure A2-3	Facility Pallet for Seven-Pack of Drums
Figure A2-5	Typical Backfill Sacks Emplaced on Drum Stacks
Figure A2-5a	Potential MgO Emplacement Configurations
Figure A2-6	Waste Transfer Cage to Transporter
Figure A2-7	Push-Pull Attachment to Forklift to Allow Handling of Waste Containers
Figure A2-8	Typical RH and CH Transuranic Mixed Waste Container Disposal Configuration
Figure A2-9	Underground Ventilation System Airflow
Figure A2-11	Typical Room Barricade
Figure A2-11a	Typical Bulkhead
Figure A2-12	WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram
Figure A2-12	WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram (Continued)
Figure A2-13	Layout and Instrumentation - As of 1/96
Figure A2-14	Facility Cask Transfer Car (Side View)

Figure A2-15 ~~Horizontal~~ Typical Emplacement and Retrieval Equipment

Figure A2-15a Typical Emplacement Equipment

Figure A2-16 RH TRU Waste Facility Cask Unloading from Waste Shaft Conveyance

Figure A2-17 Facility Cask Installed on the ~~Horizontal~~ Emplacement and Retrieval Equipment

Figure A2-18 Installing Shield Plug

Figure A2-19 Shield Plug Supplemental Shielding Plate(s)

Figure A2-20 Shielding Layers to Supplement RH Borehole Shield Plugs

Figure A2-21 Shield Plug Configuration

A2-2a(4) RH TRU Mixed Waste Handling Equipment

Horizontal-Emplacement and Retrieval Equipment

The ~~Horizontal-Emplacement and Retrieval Equipment (HERE)~~ (Figure A2-15 and A2-15a) emplaces canisters into a borehole in a room wall of an Underground HWDU. Once the canisters have been emplaced, the ~~HERE~~ emplacement equipment then fills the borehole opening with a shield plug.

A2-2b Geologic Repository Process Description

RH TRU Mixed Waste Emplacement

The Facility Cask Transfer Car is loaded onto the waste shaft conveyance and is lowered to the waste shaft station underground. At the waste shaft station underground, the Facility Cask is moved from the waste shaft conveyance by the Facility Cask Transfer Car (Figure A2-16). A forklift is used to remove the Facility Cask from the Facility Cask Transfer Car and to transport the Facility Cask to the Underground HWDU. There, the Facility Cask is placed on the ~~HERE~~ emplacement equipment (Figure A2-17). The ~~HERE~~ emplacement equipment is used to emplace the RH TRU mixed waste canister into the borehole. The borehole will be visually inspected for obstructions prior to aligning the ~~HERE and~~ equipment of the RH TRU mixed waste canister. The Facility Cask is moved forward to mate with the shield collar, and the transfer carriage is advanced to mate with the rear Facility Cask shield valve. The shield valves on the Facility Cask are opened, and the transfer mechanism advances to push the canister into the borehole. After retracting the transfer mechanism into the Facility Cask, the forward shield valve is closed, and the transfer mechanism is further retracted into its housing. The transfer mechanism is moved to the rear, and the shield plug carriage containing a shield plug is placed on the emplacement machine. The transfer mechanism is used to push the shield plug into the Facility Cask. The front shield valve is opened, and the shield plug is pushed into the borehole (Figure A2-18). The transfer mechanism is retracted, the shield valves close on the Facility Cask, and the Facility Cask is removed from the ~~HERE~~ emplacement equipment.

A shield plug is a concrete filled cylindrical steel shell (Figure A2-21) approximately 61 in. long and 29 in. in diameter, made of concrete shielding material inside a 0.24 in. thick steel shell with a removable pintle at one end. Each shield plug has integral forklift pockets and weighs approximately 3,750 lbs. The shield plug is inserted with the pintle end closest to the ~~HERE~~ emplacement equipment to provide the necessary shielding, limiting the borehole radiation dose rate at 30 cm to less than 10 mrem per hour for a canister surface dose rate of 100 rem/hr. Additional shielding is provided at the direction of the Radiological Control Technician based on dose rate surveys following shield plug emplacement. This additional shielding is provided by

the manual emplacement of one or more shield plug supplemental shielding plates and a retainer (Figures A2-19 and A2-20).

The amount of RH TRU mixed waste disposal in each panel is limited based on thermal and geomechanical considerations and shall not exceed 10 kilowatts per acre as described in Permit Attachment A2-1. RH TRU mixed waste emplacement boreholes shall be drilled in the ribs of the panels at a nominal spacing of 8 ft (2.4 m) center-to-center, horizontally.

Figures A1-26 and A1-27 are flow diagrams of the RH TRU mixed waste handling process for the RH-TRU 72-B and CNS 10-160B casks, respectively.

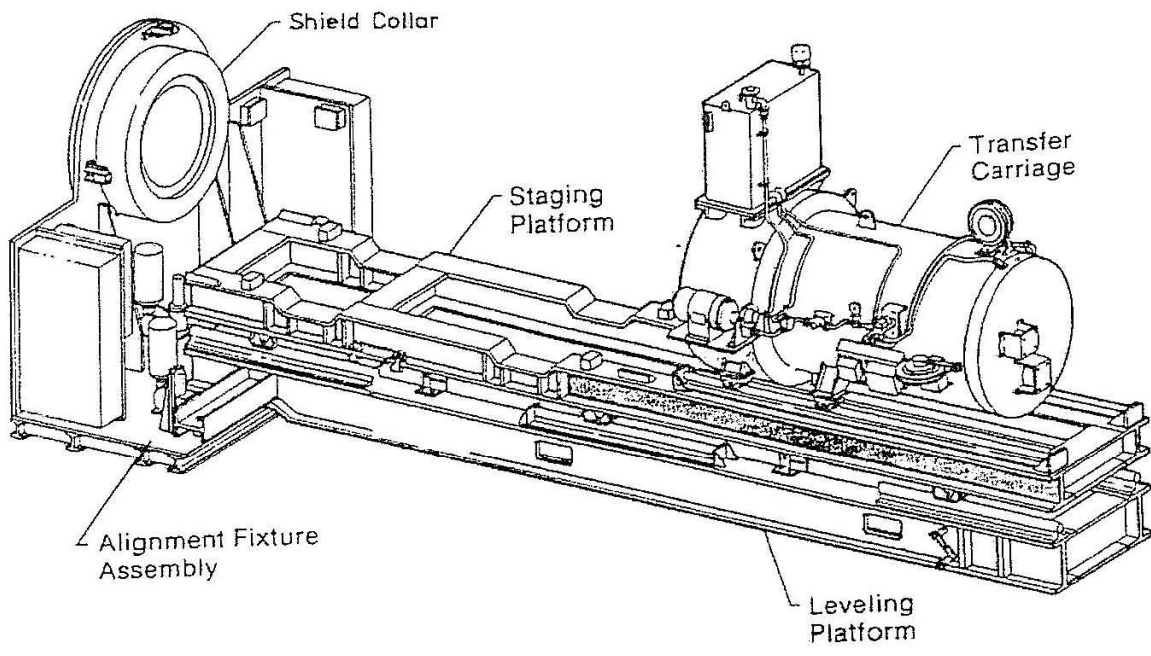


Figure A2-15
Horizontal Typical Emplacement and Retrieval Equipment

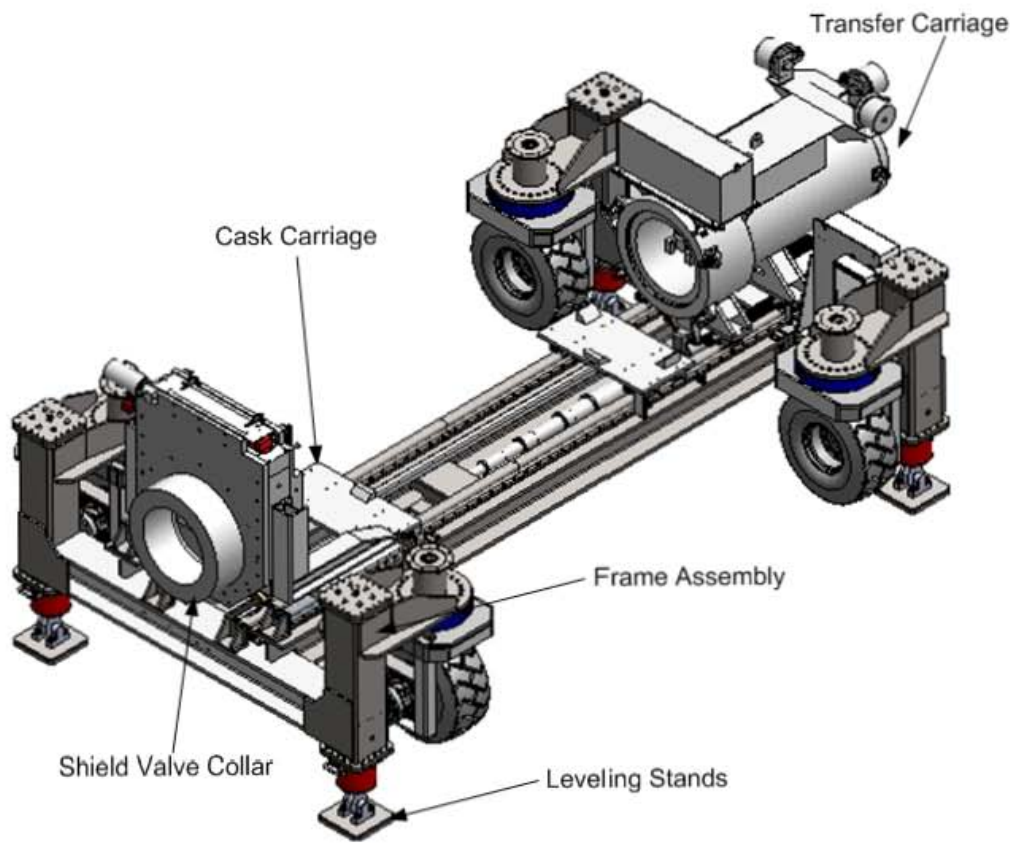


Figure A2-15a
Typical Emplacement Equipment

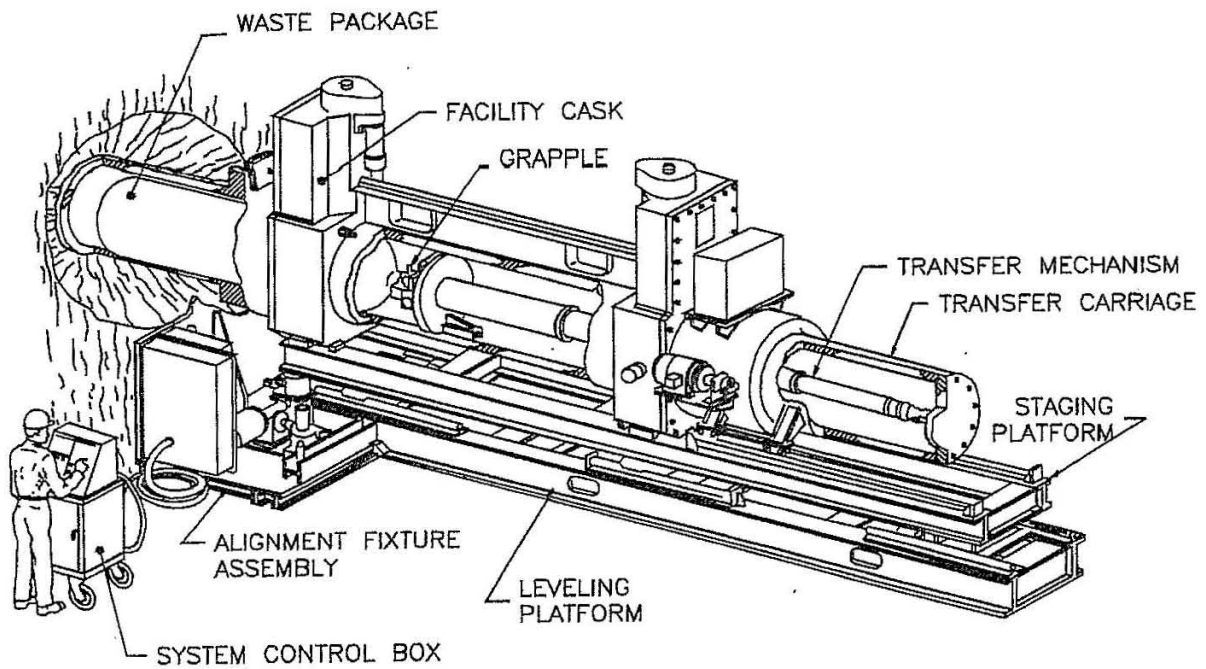


Figure A2-17
Facility Cask Installed on a Typical the Horizontal Emplacement and Retrieval Equipment

E-1 Inspection Schedule

Requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.15(d)), are met by the inspections for each item or system included in Tables E-1 and E-1a. Beginning with the effective date of this Permit, the results of the inspections are maintained in the operating record for three years and are then transferred to the WIPP Records Archive where they are maintained until closure. The inspection logs or summary records include the date and time of inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. Major pieces of waste handling equipment are inspected using proceduralized inspections. Current copies of inspection forms are maintained in the Operating Record. Non-administrative changes (i.e., changes that affect the frequency or content of inspections) to inspection forms must be submitted to the NMED in accordance with the appropriate portions of 20 NMAC 4.1.900 (incorporating 40 CFR §270.42). The status of these pieces of equipment is maintained in an equipment logbook that is separate from the checklist. The logbook contains information regarding the condition of the equipment. Equipment operators are required, by the inspection checklist, to consult the logbook as the first activity in the inspection procedure. This logbook is maintained in the operating record. CH transuranic (**TRU**) mixed waste equipment that is controlled by a logbook includes the waste handling forklifts, all waste handling cranes, the adjustable center of gravity lift fixture, the CH TRU underground transporter, the facility transfer vehicle, the trailer jockey, and the push-pull attachment. RH TRU mixed waste equipment that is controlled by a logbook includes the 140/25-ton RH Bay overhead bridge crane, cask transfer cars, 25-ton cask unloading room crane, transfer cell shuttle car, RH Bay cask lifting yoke, facility grapple, 6.2-ton overhead hoist, facility cask rotating device, hot cell overhead powered manipulator, 15-ton hot cell crane, facility cask transfer car, 41-ton forklift, facility cask, and ~~horizontal-emplacement and retrieval~~ equipment. Inspections of the Cask Unloading Room, Hot Cell, Transfer Cell, Facility Cask Loading Room, RH Bay and radiation monitoring equipment will be recorded on data sheets. In addition to the inspections listed in Tables E-1 and E-1a, many pieces of equipment are subject to regular preventive maintenance. This includes more in-depth inspections of mechanical systems, load testing of lifting systems, calibration of measurement equipment and other actions as recommended by the equipment manufacturer or as required by DOE Orders. These preventive maintenance activities along with the inspections in Tables E-1 and E-1a make mechanical failure of waste handling equipment unlikely. The WIPP Safety Analysis Report (DOE, 1999) and the WIPP Remote-Handled Waste Preliminary Safety Analysis Report (RH PSAR) (DOE, 2000) contain the results of a systematic analysis of waste handling equipment and the hazards associated with potential mechanical failures. Equipment subject to failures that cannot practically be mitigated is retained for analysis and is the basis for contingency planning. The inspection procedures maintained in the Operating Record for operational and preventive maintenance are implemented to assure the equipment is maintained. An example equipment inspection checklist and a typical logbook form are shown as Figures E-1 and E-2. Actual checklists or forms are maintained within the Operating Record.

**Table E-1a
RH TRU Waste Inspection Schedule/Procedures**

System/ Equipment Name	Responsible Organization J	Inspection a Frequency and Job Title of Personnel Normally Making Inspection ^J	Procedure Number (Latest Revision)	Inspection Criteria		
				Deterioration ^b	Leaks/ spills	Other
Cask Transfer Car(s)	Waste Operations	Pre-evolution ^{c,d,e} See List 1	WP05- WH1701 PM041187 (Semi-Annual)	Yes	NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
RH Bay Overhead Bridge Crane	Waste Operations	Preoperational ^{c,d,e,i} See List 1	WP05- WH1741 PM041232 (Quarterly) PM041117 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
Facility Cask	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05- WH1713 PM041201 (Annual) PM041203 (Annual)	Yes	NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical PM.
RH Bay Cask Lifting Yoke	Waste Operations	Preoperational ^{c,d,e,i} See List 1	WP05- WH1741 PM041169 (Annual)	Yes	NA	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
Facility Cask Transfer Car	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05- WH1704 PM041186 (Quarterly) PM041195 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication Electrical Inspection

System/ Equipment Name	Responsible Organization J	Inspection a Frequency and Job Title of Personnel Normally Making Inspection ^J	Procedure Number (Latest Revision)	Inspection Criteria		
				Deterioration ^b	Leaks/ spills	Other
Facility Cask Rotating Device	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05- WH1713 PM041175 (Annual) PM041176 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication Electrical Inspection
Facility Grapple	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05- WH1721 PM041172 (Quarterly) PM041177 (Annual)	Yes	NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear. Non-Destructive Examination
6.25-Ton Grapple Hoist	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05- WH1721 PM041173 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
Transfer Cell Shuttle Car	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05- WH1705 PM041184 (Semi-Annual) PM041222 (Annual)	Yes	Yes	Pre-evolution Pre- operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection.
Cask Unloading Room	Waste Operations	Preoperational ^{c,d,e,f,h,i} See List 1	WP05- WH1744	Yes	NA	Floor integrity
Hot Cell	Waste Operations	Preoperational ^{c,d,e,f,g,h,i} See List 1	WP05- WH1744	Yes	NA	Floor integrity
Hot Cell Overhead Powered Manipulator	Waste Operations	Preoperational ^{c,d,e,i} See List 1	WP05- WH1743 PM041215 (Annual) PM041216 (Annual) IC411037 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration

System/ Equipment Name	Responsible Organization J	Inspection a Frequency and Job Title of Personnel Normally Making Inspection ^J	Procedure Number (Latest Revision)	Inspection Criteria		
				Deterioration ^b	Leaks/ spills	Other
Hot Cell Bridge Crane	Waste Operations	Preoperational c,d,e,i See List 1	WP05- WH1742 PM041217 (Annual) PM041209 (Annual) IC411038 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration.
Transfer Cell	Waste Operations	Preoperational c,d,e,f,h,i See List 1	WP05- WH1744	Yes	NA	Floor integrity
Facility Cask Loading Room	Waste Operations	Preoperational c,d,e,f,h,i See List 1	WP05- WH1744	Yes	NA	Floor integrity
Closed Circuit Television Camera	Waste Operations	Preoperational ^{c,i} See List 1	WP05- WH1757	NA	NA	Operability
Radiation Monitoring Equipment	Radiation Control	Preoperational c,d,e See List 2	WP12- HP1245 IC240010 WP12- HP1307 IC240007 WP12- HP1314 (Annual)	Yes	NA	Operability Checks, Functional Checks, Instrument calibrations, Flow Calibration, Efficiency Checks.
Cask Unloading Room Crane	Waste Operations	Preoperational c,d,e,i See List 1	WP05- WH1719 PM041190 (Quarterly) PM041191 (Annual) PM041192 (Annual) IC411035 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration.

System/ Equipment Name	Responsible Organization J	Inspection a Frequency and Job Title of Personnel Normally Making Inspection ^J	Procedure Number (Latest Revision)	Inspection Criteria		
				Deterioration ^b	Leaks/ spills	Other
Horizontal Emplacement and Retrieval Equipment	Waste Operations	Pre-evolution ^{c,d,e,f} See List 1	WP05- WH1700 PM052010 (Semi- Annual) ^k PM052011 (Annual) PM052013 PM052012 PM052014 (Annual)	Yes	Yes	Assembly and Operating Instructions. Electrical Inspection. Position Transducer Calibration. Tilt Sensor Calibration.
41-Ton Forklift	Waste Operations	Preoperational ^{c,d,e,i} See List 1	WP05- WH1602 PM074061 PM052003 (Hours of Use) PM074027 (Quarterly) PM074029 & PM074051 (Annual)	Yes	Yes	Pre-Operational Checks. PM performed every 100 hours of operation, every 500 hours of operation or every 5 Years. Quarterly Engine Emission Test. Annual Electrical Inspection. Annual NDE.
RH Bay	Waste Operations	Preoperational ^{c,d,e,h,i} See List 1	WP05- WH1744	Yes	NA	Floor integrity
Surface RH TRU Mixed Waste Handling Area	Waste Operations	Preoperational ⁱ See List 1	WP- 05 WH1744	Yes	Yes	Posted Warning, Communications

Table E-1a (Continued)
RH TRU Mixed Waste Inspection Schedule/Procedures Lists

List 1: Waste Operations

RH Waste Handling Engineer

Qualified TRU-Waste Handler

List 2: Radiological Control

Radiological Control Technician

Item 6

Description

Revise three Questions in Attachment C6 checklist (Item #1, Item #32, and Item #200).

The first change to the C6 Checklist is to revise question #1 to be consistent with the language in Attachment C, Section C-0a. The second change is to revise question #32 to be consistent with the language in Attachment C3, Section C3-10a. The third change is to revise question #200 to be consistent with the language in Attachment C3, Section C3-1b.

Basis

The change is classified as an “administrative and informational change” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

The purpose of this modification is to revise three items in the C6 checklist to correctly identify and reference the appropriate section of the Permit. The first change in the C6 checklist is to revise Item #1 to change the definition of a “waste stream” to be consistent with the reference in Attachment C, Section C-0a.

The second change to the C6 checklist is to revise Item #32 to change the language to be consistent with Attachment C3, Section C3-10a due to the fact that a technical supervisor is no longer required by the Permit.

The third change to the C6 checklist is to revise Item #200 to change Site Project QA Officer to the Site Project Manager per Attachment C3, Section C3-1b.

Revised Permit Text

1. Does the generator/storage site define “waste stream” as waste materials that have common physical form, that contains similar hazardous constituents, and that are generated from a single process or ~~from an activity that is similar in material, physical form, and hazardous constituents?~~ (Attachment C Section C-0a)

32. With respect to data generation, are procedures in place to ensure that the generator/storage site’s waste characterization program meets the following general requirements:
 - Analytical data packages and batch data reports must be reported accurately in a pre-approved format, must be maintained in permanent files, and must be traceable?

 - All data must receive a technical review by another qualified analyst? ~~or the technical supervisor, and the laboratory QA officer?~~

(Section C3-10a)

200. Do procedures adequately assign the site project manager ~~Site Project QA Officer~~ with the responsibility of monitoring field QC results and initiate the nonconformance report process in the event the following acceptance criteria are not met or sample collection frequencies are not met:
 - Field and equipment blanks shall be less than 3 times the detection limits specified in Table C3-2 and equipment blank results determined by FTIR shall be less than the PRQL specified in Table C3-2 (Section C1-1b(1) and C1-1b(2))

 - Field reference standards shall have a recovery of between 70 and 130% (Table C1-3)

 - Field Duplicates shall have an RPD of less than or equal to 25

(Sections C1-1b and C1-1b(4); Table C1-3)

Item 7

Description

This modification will add an option for the underground Ambulance #2 to be either diesel and/or electric and we have eliminated the term “hardcab” as a hardcab is not necessary to perform the functions that are required in Attachment D, Table D-6.

Basis

The change is classified as an “Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls)” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.3).

Discussion

The description in the Permit only specifies diesel motors. The Permittees are making this change to utilize electric motors as well.

Revised Permit Text

**Table D-6
Emergency Equipment Maintained at the Waste Isolation Pilot Plant**

Equipment	Description and Capabilities	Location
Communications		
Building Fire Alarms	Manual pull stations and automatic devices (sprinkler system flow, and smoke and thermal detectors) trigger fire alarm; locally visible and audible; visual display and alarm in Central Monitoring Room (CMR)	Guard and Security Building, Pumphouse, Warehouse/Shops, Exhaust Filter Building, Support Building, CMR/ Computer Room, Waste Handling Building, TRUPACT Maintenance Facility, SH Hoisthouse, Maintenance Shops, Guard Shack*, Auxiliary Warehouse, Core Storage Building, Engineering Building, Training Facility, Safety Building, Maintenance Shop, Hazardous Waste Storage (non-TRU) Area (Facility 474) *local alarms; not connected to the CMR
Underground Fire Alarms	Automatic/Manual; have priority over other paging channel signals but not override intercom channels; alarms sound in the general area of the control panel and are connected to the underground evacuation alarms; they also interface with the CMR.	Fire detection and control panel locations: Waste Shaft Underground Station, SH Shaft Underground Station, Between E-140 and E-300 in S-2180 Drift, E-O/N-1200, Fuel Station
Site-wide Evacuation Alarm	Transmitted over paging channel of the public address system, overriding its normal use; manually initiated according to procedures requiring evacuation; audible alarm produced by tone generator at 10 decibels above ambient noise level (or at least 75 decibels); flashing strobe lights; radios and/or pagers are used to notify facility personnel outside alarm range. Monthly test are performed on the PA, site notification alarms, and plectrons.	Site-wide
Vehicle Siren	Manual; oscillating; emergency services/surface response vehicles, is mechanical and electronic.	WIPP surface emergency vehicles
Public Address System	Includes intercom phones; handset stations and loudspeaker assemblies, each with own amplifiers; multichannel, one for public address and pages, and others for independent party lines.	Surface and underground
Intraplant Phones	Private automatic branch exchange; direct dial; provide communication link between surface and underground operations	Throughout surface and underground

Equipment	Description and Capabilities	Location
Mine Page Phones	Battery-operated paging system	CMR, Mine Rescue Room, EOC, lamproom, underground at S550/W30, S100/W30, S1950/E140, SH Shaft Collar and Underground Station, Waste Shaft Collar and Underground Station, FSM desk.
Emergency Pagers	Manual; , intermittent alarm signals	Issued to appropriate emergency personnel
Plectrons	Tone-alert radio receivers placed in areas not accessible by the public address system	Site-wide
Portable Radios	Two-way, portable; transmits and monitors information to/from other transmitters	Issued to individuals
Plant Base Radios	Two-way, stationary, VHF-FM; linked to Eddy County Sheriff Department, NM State Police, and Otis Fire Department), and WIPP Channels 1-18 (Communication with the Lea County Sheriff's Department, the Hobbs Fire Department, Carlsbad Medical Center and Lea Regional Hospital is available via the Eddy County dispatcher) (Site Security, Site Operations and Site Emergency, maintenance, repeater to Carlsbad). Wireless communications such as cellular phones may be used to contact the Eddy County emergency responders.	Various site locations
Mobile Phones	Provide communications link between WIPP Security and key personnel	Issued to individuals plus emergency vehicles,
Spill Response		
SPILL-X-S Guns and Recharge Powder	Containment; (1)SPILL-X model SC-30-C(Gun) (1)SPILL-X model XC-30-S(Gun) (1)SPILL-X model SC-30-A(Gun); (1) A-Acid, 5 gallon bucket (Recharge Powder) (1)S-Solvent, 5 gallon bucket (Recharge Powder) (1)C-Caustic, 5 gallon bucket (Recharge Powder)	HAZMAT trailer
Absorbent Sheets	Containment or cleanup; (1) 3' x 100' Sheet	HAZMAT trailer
Absorbents	Grab and Go container; spill control bucket; (1) for solvents and neutralizing absorbents; 5 gallon bucket (1) for acids/caustics; 5 gallon bucket	HAZMAT trailer
Absorbent Material	Containment or cleanup; (1) 100 ft. rolled or equivalent socks "Pig" for general liquid (1) 100 ft. rolled or equivalent socks "Pig" for oil	HAZMAT trailer
Air Bag System	Extrication, Stabilization, Cribbing (1) bag system with tank kit and the following bag sizes: (1)12-ton, (1) 21.8-ton, (1)17-ton	Surface rescue truck
Air Chisel	Extrication (1) Capable of cutting 3/16" steel	Surface rescue truck
Drum Transfer Pumps and Drum Opener	Containment or cleanup; (1) unit for chemical transfer (1) hand operated pump for petroleum transfer (1) drum opener	HAZMAT trailer

Equipment	Description and Capabilities	Location
Floor Squeegee	Containment or cleanup; (1) straight rubber blade, nonwood handle	HAZMAT trailer
Foam Concentrate	AFFF 6% (4) 5-gallon pail	Fire truck # 1
Gas Cylinder Leak Control Kit	(1)Series A Hazardous Material Response Kit; contains nonsparking equipment to control and plug leaks	HAZMAT trailer
Portable Generator	(1)Backup power; 5,000 watt; 120 or 240 volt	Surface rescue truck
Hand Tools	Containment and cleanup; Underground rescue truck: (1)12# Sledge Hammer (1)3/8" Drive Socket Set (1)1/2" Drive Socket Set (1)3/4" Drive Socket Set (1)25' 1/2" Chain (1)6' Wrecking Bar (1)Bottle Jack (1)4# Hammer (1)18" Crescent Wrench (1)5' Pry Bar (1)2' Pry Bar (1)100' Extension Cord (1)4' Nylon Sling (1)6' Nylon Sling (1)10' Nylon Sling These tools are located in the HAZMAT Trailer. They are non-sparking. (1)14"L adjustable pipe wrench (1)15" multi-opening bung wrench (1)hammer/crate opener (1)8" pipe pliers (1)8" blade Phillips (1)#2 screwdriver (1)6" blade standard screwdriver (1)Claw Hammer	Underground rescue truck, HAZMAT trailer
Come-a-longs	(1) 4-ton; cable-type Ratchet lever tool designed specifically for lifting, lowering and pulling applications including jobs requiring rigging, positioning, and stretching. Used in rescue for extrication.	Surface rescue truck and underground rescue truck
Porta-power	(1) 10-ton hydraulic, hand-powered jaws used for extrication during rescues.	Surface rescue truck
Jugs	Containment or cleanup; (4) 1-gallon plastic	HAZMAT trailer
Pails	Containment or cleanup; (3) 5-gallon plastic with lid	HAZMAT trailer
Portable Lighting	(1) Emergency lighting system; 120 volts; 500-watt bulbs, suitable for wet location	Underground rescue truck
Patching Kit	Series A Hazardous Response Kit; Class A; contains nonsparking equipment to control and plug leaks.	HAZMAT trailer
Scoops and Shovels	Cleanup; plastic; various sizes; nonsparking; nonwood handles (1) Scoop (3) Shovels	HAZMAT trailer

Equipment	Description and Capabilities	Location
Medical Resources		
Ambulance #1	Equipped as per Federal Specifications KKK-A-1822 and New Mexico Emergency Medical Services Act General Order 35; equipped with a radio to Carlsbad Medical Center, VHF radio, UHF medical frequency, cellular phone	Surface (Safety and Emergency Services Facility)
Ambulance #2	Diesel and/or electric hard cab ambulance equipped with first aid kit, 2 stretchers, and other associated medical supplies	Underground
Rescue Truck	Special purpose vehicle; light and heavy duty rescue equipment; transports 1 litter patient, medical oxygen and supplies for mass casualties, fire suppression support equipment (rescue tool, air bag, K-12 Rescue Saw, 5,000-watt generator, self-contained breathing apparatus (SCBA), and much more equipment	Surface (Safety and Emergency Services Facility)
Fire Detection and Fire Suppression Equipment		
Building Smoke, Thermal Detectors, or Manual Pull Stations	Ionization and photoelectric or fixed temperature/rate of rise detectors; visual display and alarm in CMR; manual pull stations. The underground has manual fire alarm pull stations located where personnel have access when evacuating. These are connected to the U/G evacuation alarm.	Guard and Security Building, Warehouse/Shops, Support Building, CMR/Computer Room, Waste Handling Building, TRUPACT Maintenance Facility, Waste Shaft Collar, Underground Fuel Station, SH Hoisthouse, Engineering Building, Industrial Safety Building, Training Facility
Fire Truck # 1	Equipped per Class "A" fire truck per NFPA; capacity 750 gallons, with pump capacity of 1200 gallons per minute	Surface (Safety and Emergency Services Facility)
Rescue Truck # 2 (U/G)	(1) 125-pound dry chemical extinguisher (1) 150-pound foam extinguisher	Underground
Extinguishers	Individual fire extinguisher stations; various types located throughout the facility, conforming to NFPA-10.	Buildings, underground, and underground vehicles
Automatic Dry Chemical Extinguishing Systems	Automatic; 1,000-pound system (Dry Chemical); actuated by thermal detectors or by manual pull stations	Underground fuel station
Sprinkler Systems	Fire alarms activated by water flow	Pumphouse, Guard and Security Building, Support Building, Waste Handling Building (contact- transuranic waste area only), Warehouse/Shops Building, Auxiliary Warehouse Building, TRUPACT Maintenance Facility, Training Facility, SH Shaft Hoisthouse, Exhaust Filter Building, Engineering Building, and Safety Building
Water Tanks, Hydrants	Fire suppression water supply; one 180,000-gallon capacity tank, plus a second tank with 100,000 gallon reserve	Tanks are at southwestern edge of WIPP facility; pipelines and hydrants are throughout the surface

Equipment	Description and Capabilities	Location
Fire Water Pumps	Fire suppression water supply; 125 pounds per square inch, 1,500 gallons per minute centrifugal pump, one with electric motor drive, the other with diesel engine; pressure maintenance pump	Pumphouse
Personal Protection Equipment		
Headlamps	Mounted on hard hat; battery operated	Each person underground
Underground Self-Rescuer Units	Short-term rebreathers; approximately 300	Each person underground
Self-Contained Self-Rescuer	At least 60 minutes of oxygen available. Approximately 400 units cached throughout the underground	Cached throughout the underground
Self-Contained Breathing Apparatus (SCBA)	Oxygen supply; 4-hour units; approximately 14 Mine Rescue Team Draeger units	Mine Rescue Training Room
Chemical and Chemical-Supported Gloves	Body protection; (12 pair) inner-cloth, (12 pair) outer-pvc, (5 pair) outer-viton	HAZMAT trailer
Suit, Acid	Body protection; (4) acid	HAZMAT trailer
Suit, Fully Encapsulated	Body protection; used with SCBAs; full outerboot; (4) Level A; (4) Level B	HAZMAT trailer
Emergency Medical Equipment		
Antishock Trousers	Shock treatment; (2) inflatable, one on each ambulance	Ambulance # 1 and # 2
Zoll 1600 Heart Monitor and Defibrillator	Heart Monitor/defibrillator	Ambulance # 1 and # 2
Oxygen	Patient care; Size D: (2) Ambulance #1 (1) Underground Ambulance (1) Health Services Size E: (1) Rescue Truck (2) Underground Ambulance Size M: (1) Ambulance #1	Ambulance # 1 and # 2, surface rescue truck
Resuscitators (Bag)	Disposable bag resuscitation Ambulance #1: (2) adult size (1) child size Underground Ambulance: (2) adult size	Ambulance # 1, Ambulance # 2
Splints	Immobilize limbs; (1) Adult traction splint, lower extremity, with limb-supporting slings, padded ankle hitch and traction device per ambulance. (2) Rigid splinting devices or equivalents, suitable for immobilization of upper extremities per ambulance. (2) Rigid splinting devices or equivalents, suitable for the immobilization of lower extremities. (1) Set of Airsplints: 6 assorted splints; hand/wrist, half arm, full arm, foot/ankle, half leg, and full leg per miner's aid stations.	Ambulance # 1 and # 2, Miner's Aid Stations

Equipment	Description and Capabilities	Location
Stretchers	Patient transport; (2) Spine Boards, one short and one long, with nylon straps per ambulance. (also used to perform cardiopulmonary resuscitation) (2) Emergency Stretchers or scoops, or combination per ambulance (1) All-purpose multi-level ambulance stretch (gurney), with 3 safety straps and locking mechanism per ambulance. (1) Stretcher in each miner's aid station.	Various combinations in Ambulance # 1 and # 2, Miner's Aid Station
Suctions	For medical emergencies: Portable (1) Suction unit, capable of delivering at least 300 mm. HG on each ambulance.	Ambulances #1 and #2
Trauma Kits	(1) adult blood pressure cuff and stethoscope (4) soft-roller bandages (3) triangular bandages (1) pkg. band-aids (2) trauma dressings (25) 4X4 sponges (1) roll adhesive tape (1) bite stick (1) penlight (1) sterile burn sheet (1) oropharyngeal airway (1) glucose substance (2) sterile gauze dressings	(1) kit in each: Ambulances #1 and #2, surface rescue truck
Miner's Aid Station	For First Aid Stations in the Underground (1) Stretcher--as referenced above per station (1) Set of airsplints--as referenced above per station (1) Blanket per station (1) Box of latex gloves (50) per station (5) Pathogen Wipes per station (1) First Aid Kit (24) per station; includes, (3) Band-Aid Combo Paks (2) Swabs, PVP (1) Antibiotic Ointment (1) Sting-Kill Swab (2) Dressing, compresses (2) Roller Bandages (2) Tape (2) Triangle Bandage (1) Eyedressing Pak (1) Burn Dressing (1) Ammonia Inhalants (1) User Log Sheet	Miner's Aid Stations - Various Underground Locations

Equipment	Description and Capabilities	Location
First Aid Supplies	According to General Order #35 (12) bandages, soft roller, self-adhering type--4" or 6" x 5 yards. (6) triangular bandages, 40" (1) box band-aids (1) 1 pair bandage shears (6) Trauma dressings, 30" x 10" (6) Trauma dressings, 5" x 7" (50) 4" x 4" sponges, individually wrapped and sterile (2) rolls adhesive tape (1) penlight (2) sterile burn sheets (2) oropharyngeal airways -- adult (2) oropharyngeal airways -- child (Ambulance #1 only) (2) oropharyngeal airways -- infant (Ambulance #1 only) (1) Glucose substance (3) Occlusive dressings (1) Roll aluminum foil (6) Rigid cervical collars--2 each small, medium and large sizes (4) Cold packs (4) Heat packs (2) Bite sticks	Ambulance #1
First Aid Supplies	(2) Transfer sheets (2) Blankets	Ambulances #1 and #2
First Aid Supplies	(2) #16g angiosets (2) #18g angiosets (2) #20g angiosets (1) 1000cc LR IV fluid (1) 500cc NS IV fluid	Ambulances #1 and #2, surface rescue truck
General Plant Emergency Equipment		
Emergency Lighting	For employee rescue and evacuation, and fire/spill containment; linked to main power supply, and selectively linked to back up diesel power supply and/or battery-backed power supply	Surface and underground
Backup Power Sources	Two diesel generators, and battery-powered uninterruptible power supply (UPS); use limited to essential loads; manual or remote starting 1,100-kilowatt diesel generators with on-site fuel for 62% load for 3 days for selected loads; 30-minute battery capacity for essential loads	Generators are east of Safety and Emergency Services Building; UPS is located at the essential loads
Hoists	Hoists in Waste Shaft, Air Intake Shaft, and SH Shaft	Waste Shaft, Air Intake Shaft, SH Shaft
Radiation Monitoring Equipment	(5) Portable alpha and beta survey meters, portable air samplers, and portable continuous air monitors	Building 412
Emergency Shower	For emergency flushing of contaminated individual	Surface
Eye Wash Fountains	For emergency flushing of affected eyes	Various locations on surface and in the underground
Decon Shower Equipment	Self-contained decon shower trailer, portable decon shower unit, disposable decon shower	Surface
Overpack containers	14-85 Gallon drums 4-SWBs 1-TDOP	Building 481 Building 481 Building 481
HEPA Vacuums	2 HEPA Vacuums to be utilized for removal of contamination.	Building 481

Equipment	Description and Capabilities	Location
Aquaset or Cement	100 lbs. of aquaset or cement material for solidification of liquid waste generated as a result of fire fighting water or decontamination solutions.	Building 481
Polyvinyl Alcohol or Paint	1 - 5 gallon bucket of approved fixative to be used during recovery.	Building 481
TDOP U-pender	U-pender facilitates overpacking standard waste boxes	Building 481
Non hazardous Decontaminating Agents	4-1 Gallon bottles for decontamination of surfaces, equipment, and personnel	Building 481

Item 8

Description

This modification will revise document numbers in Attachment E, Table E-1 from PM0000 to WP 12-FP document numbers in Attachment E, Table E-1. The change will affect the following procedures, PM000027 to 12-FP0027, PM000029 to 12-FP0029, PM000030 to 12-FP0030, PM000031 to 12-FP0031, PM000033 to 12-FP0033, PM000034 to 12-FP0034, PM000035 to 12-FP0035 and, PM000036 to 12-FP0036. Additionally, a security procedure in Attachment E, Table E-1 will be revised from PF0-008 to PF0-010.

Basis

The change is classified as an “Administrative and informational changes” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

The inspection requirements for emergency services have been renumbered as procedures instead of preventative maintenance documents, because the equipment covered by these inspections is important to operations and requires the additional formality offered by procedures. The change to the security procedure number (PF0-008 to PF0-010) was made as an update to the inspection procedure. No substantial change was made to the inspection forms included in the procedures.

Revised Permit Text

**Table E-1
Inspection Schedule/Procedures**

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Air Intake Shaft Hoist	Underground Operations	Preoperational ^c See Lists 1b and c	WP 04-HO1004 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m in accordance with Mine Safety and Health Administration (MSHA) requirements
Ambulances (Surface and Underground) and related emergency supplies and equipment	Emergency Services	Weekly See List 11	PM000030 -12-FP0030 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Required Equipment ⁿ
Adjustable Center of Gravity Lift Fixture	Waste Handling	Preoperational See List 8	WP 05-WH1410 Inspecting for Mechanical Operability ^m and Deterioration ^b
Backup Power Supply Diesel Generators	Facility Operations	Monthly See List 3	WP 04-ED1301 Inspecting for Mechanical Operability ^m and Leaks/Spills by starting and operating both generators. Results of this inspection are logged in accordance with WP 04-AD3008.
Facility Inspections (Water Diversion Berms)	Facility Engineering	Annually See List 4	WP 10-WC3008 Inspecting for Damage, Impediments to water flow, and Deterioration ^b
Central Monitoring Systems (CMS)	Facility Operations	Continuous See List 3	Automatic Self-Checking
Contact-Handled (CH) TRU Underground Transporter	Waste Handling	Preoperational See List 8	WP 05-WH1603 Inspecting for Mechanical Operability ^m , Deterioration ^b , and area around transporter clear of obstacles
Conveyance Loading Car	Waste Handling	Preoperational See List 8	WP 05-WH1406 Inspecting for Mechanical Operability ^m , Deterioration ^b , path clear of obstacles, and guards in the proper place
Facility Transfer Vehicle	Waste Handling	Preoperational See List 8	WP 05-WH1204 Inspecting for Mechanical Operability ^m , Deterioration ^b , path clear of obstacles, and guards in the proper place

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Exhaust Shaft	Underground Operations	Quarterly See List 1a	PM041099 Inspecting for Deterioration ^b and Leaks/Spills
Eye Wash and Shower Equipment	Equipment Custodian	Weekly See List 5	WP 12-IS1832 Inspecting for Deterioration ^b
		Semi-annually See List 2a	WP 12-IS1832 Inspecting for Deterioration ^b and Fluid Levels–Replace as Required
Fire Detection and Alarm System	Emergency Services	Semiannually See List 11	PM000027 12-FP0027 Inspecting for Deterioration ^b , Operability of indicator lights and, underground fuel station dry chemical suppression system. Inspection is per NFPA 17
Fire Extinguishers ^j	Emergency Services	Monthly See List 11	PM000036 12-FP0036 Inspecting for Deterioration ^b , Leaks/Spills, Expiration, seals, fullness, and pressure
Fire Hoses	Emergency Services	Annually (minimum) See List 11	PM000034 12-FP0031 Inspecting for Deterioration ^b and Leaks/Spills
Fire Hydrants	Emergency Services	Semi-annual/ annually See List 11	PM000034 12-FP0034 Inspecting for Deterioration ^b and Leaks/Spills
Fire Pumps	Emergency Services	Weekly/annually See List 11	WP 12-FP0026 Inspecting for Deterioration ^b , Leaks/Spills, valves, and panel lights
Fire Sprinkler Systems	Emergency Services	Monthly/ quarterly See List 11	WP 12-FP0025 Inspecting for Deterioration ^b , Leaks/Spills, static pressures, and removable strainers
Fire and Emergency Response Trucks (Seagrave Fire Apparatus, Emergency One Apparatus, and Underground Rescue Truck)	Emergency Services	Weekly See List 11	PM000033 12-FP0033 Inspecting for Mechanical Operability ^m , Deterioration ^b , Leaks/Spills, and Required Equipment ⁿ
Forklifts Used for Waste Handling (Electric and Diesel forklifts, Push-Pull Attachment)	Waste Handling	Preoperational See List 8	WP 05-WH1201, WP 05-WH1207, WP 05-WH1401, WP 05-WH1402, WP 05-WH1403, and WP 05-WH1412 Inspecting for Mechanical Operability ^m , Deterioration ^b , and On board fire suppression system
Hazardous Material Response Equipment	Emergency Services	Weekly See List 11	PM000033 12-FP0033 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Required Equipment ⁿ

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Miners First Aid Station	Emergency Services	Quarterly See List 11	PM000035 12-FP0035 Inspecting for Required Equipment ⁿ
Mine Pager Phones (between surface and underground)	Facility Operations	Monthly See List 3	WP 04-PC3017 Testing of PA and Underground Alarms and Mine Page Phones at essential locations
MSHA Air Quality Monitor	Maintenance/ Underground Operations	Daily ^l See Lists 1 and 10	WP 12-IH1828 Inspecting for Air Quality Monitoring Equipment Functional Check
Perimeter Fence, Gates, Signs	Security	Daily See List 6	PF0-008 PF0-010 Inspecting for Deterioration ^b and Posted Warnings
Personal Protective Equipment (not otherwise contained in emergency vehicles or issued to individuals): —Self-Contained Breathing Apparatus	Emergency Services	Weekly See List 11	PM000029 12-FP0029 Inspecting for Deterioration ^b and Pressure
Public Address (and Intercom System)	Facility Operations	Monthly See List 3	WP 04-PC3017 Testing of PA and Underground Alarms and Mine Page Phones at essential locations Systems operated in test mode
Radio Equipment	Facility Operations	Daily ^l See List 3	Radios are operated daily and are repaired upon failure
Rescue Truck (Surface and Underground)	Emergency Services	Weekly See List 11	PM000030 and PM000033 12-FP0030 and 12-FP0033 Inspecting for Mechanical Operability ^m , Deterioration ^b , Leaks/Spills, and Required Equipment ⁿ
Salt Handling Shaft Hoist	Underground Operations	Preoperational See List 1b and c	WP 04-HO1002 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m in accordance with MSHA requirements
Self-Rescuers	Underground Operations	Quarterly See List 1c	WP 04-AU1026 Inspecting for Deterioration ^b and Functionality in accordance with MSHA requirements

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Surface TRU Mixed Waste Handling Area ^k	Waste Handling	Preoperational or Weekly ^e See List 8	WP 05-WH1101 Inspecting for Deterioration ^b , Leaks/Spills, Required Aisle Space, Posted Warnings, Communication Systems, Container Condition, and Floor coating integrity
TRU Mixed Waste Decontamination Equipment	Waste Handling	Annually See List 8	WP 05-WH1101 Inspecting for Required Equipment ⁿ
Underground Openings— Roof Bolts and Travelways	Underground Operations	Weekly See List 1a	WP 04-AU1007 Inspecting for Deterioration ^b
Underground— Geomechanical Instrumentation System (GIS)	Geotechnical Engineering	Monthly See List 9	WP 07-EU1301 Inspecting for Deterioration ^b
Underground TRU Mixed Waste Disposal Area	Waste Handling	Preoperational See List 8	WP 05-WH1810 Inspecting for Deterioration ^b , Leaks/Spills, mine pager phones, equipment, unobstructed access, signs, debris, and ventilation
Uninterruptible Power Supply (Central UPS)	Facility Operations	Daily See List 3	WP 04-ED1542 Inspecting for Mechanical Operability ^m and Deterioration ^b with no malfunction alarms. Results of this inspection are logged in accordance with WP 04-AD3008.
TDOP Upender	Waste Handling	Preoperational See List 8	WP 05-WH1010 Inspecting for Mechanical Operability ^m and Deterioration ^b
Vehicle Siren	Emergency Services	Weekly See List 11	Functional Test included with inspection of the Ambulances, Fire Trucks, and Rescue Trucks
Ventilation Exhaust	Maintenance Operations	Quarterly See List 10	IC041098 Check for Deterioration ^b and Calibration of Mine Ventilation Rate Monitoring Equipment
Waste Handling Cranes	Waste Handling	Preoperational See List 8	WP 05-WH1407 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Leaks/Spills
Waste Hoist	Underground Operations	Preoperational See List 1b and c	WP 04-HO1003 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m , Leaks/Spills, in accordance with MSHA requirements

System/Equipment Name	Responsible Organization	Inspection a Frequency and Job Title of Personnel Normally Making Inspection	Procedure Number and Inspection Criteria
Water Tank Level	Facility Operations	Daily See List 3	SDD-WD00 Inspecting for Deterioration ^b , and water levels. Results of this inspection are logged in accordance with WP 04-AD3008.
Push-Pull Attachment	Waste Handling	Preoperational See List 8	WP 05-WH1401 Inspecting for Damage and Deterioration ^b
Trailer Jockey	Waste Handling	Preoperational See List 8	WP 05-WH1405 Inspecting for Mechanical Operability ^m and Deterioration ^b
Explosion-Isolation Walls	Underground Operations	Quarterly See List 1	Integrity and Deterioration ^b of Accessible Areas
Bulkhead in Filled Panels	Underground Operations	Monthly See List 1	Integrity and Deterioration ^b of Accessible Areas
Bolting Robot	Waste Handling	Preoperational See List 8	WP 05-WH1203 Mechanical Operability ^m
Yard Transfer Vehicle	Waste Handling	Preoperational See List 8	WP 05-WH1205 Mechanical Operability ^m , Deterioration ^b , Path clear of obstacles and Guards in proper place
Payload Transfer Station	Waste Handling	Preoperational See List 8	WP 05-WH1208 Mechanical Operability ^m , Deterioration ^b , and Guards in proper place
Monorail Hoist	Waste Handling	Preoperational See List 8	WP 05-WH1202 Mechanical Operability ^m , Deterioration ^b , and leaks/spills
Bolting Station	Waste Handling	Preoperational See List 8	WP 05-WH1209 Mechanical Operability ^m , Deterioration ^b , and Guards in proper place