Associate Director for ESH
Environment, Safety, and Health
P.O. Box 1663, MS K491
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505-667-4218/Fax 505-665-3811

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5794/Fax (505) 667-5948

Date: AUG 13 2014
Ref: ADESH-14-041

J. R. Stroble, Acting Assistant Manager
Office of Program Management
Carlsbad Field Office
U. S. Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Mr. Stroble,

Subject: Written Concurrence for Correction of Waste Manifests

The purpose of this letter is to follow up our recent conversation regarding a discrepancy on manifests for containers (see attachment) that were shipped from the Los Alamos National Laboratory (LANL) to the Waste Isolation Pilot Plant (WIPP). The containers were received at the WIPP facility between August 8, 2013, and January 29, 2014, in shipments associated with 49 separate manifests (see attachment). WIPP accepted the shipments for disposal, and the manifests were returned to LANL without any discrepancies identified. Due to recent events at WIPP, and re-evaluation of Acceptable Knowledge information, the Carlsbad Field Office (CBFO) notified LANL that there was a manifest discrepancy based on WIPP's determination that nitrate salt-bearing waste containers required application of the EPA Hazardous Waste Number D001 and DOT subsidiary Hazard Division 5.1. Further, CBFO requested concurrence from LANL that the manifests can be corrected pursuant to Section C-5b(1) of the WIPP Waste Analysis Plan (the WAP) which provides that errors on a manifest can be corrected by WIPP with a verbal (followed by a mandatory written) concurrence by the generator/storage site technical contact. This letter provides that written concurrence.

At the time LANL shipped the containers to WIPP, the manifests identified the hazardous waste numbers and hazard class determined to be appropriate at that time based on acceptable knowledge. Due to the recent events at WIPP, LANL has been re-evaluating the characterization of the waste stream. On July 30, 2014, the Department of Energy, National Nuclear Administration (DOE/NNSA) and Los Alamos National Security, LLC (LANS) notified the New Mexico Environment Department that LANL had decided to provisionally apply EPA Hazardous Waste

Number D001 for the characteristic of ignitability to certain nitrate salt-bearing waste containers stored at LANL.

We are continuing to re-evaluate the waste characterization information concerning these nitrate salt waste streams, and will keep you updated as to new relevant information. If you have questions please contact Michael Brandt (LANS) at (505) 667-4218, or Pete Maggiore (DOE) at (505) 665-5025.

Sincerely,

Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety, and Health
Los Alamos National Security, LLC

Peter Maggiore
Assistant Manager
Environmental Projects Office
Los Alamos Field Office

Enclosures: (1) List of Manifests Requiring Correction

Cy: Kimberly Davis Lebak, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Gene E. Turner, NA-LA, (E-File)
Kirsten M. Laskey, NA-LA, (E-File)
Eric L. Trujillo, NA-LA, (E-File)
Carl A. Beard, PADOPS, (E-File to aosburn@lanl.gov)
Michael T. Brandt, ADESH, (E-File)
Raeanna R. Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Jeffery D. Mousseau, ADEP, (E-File)
Daniel R. Cox, ADEP, (E-File)
Victoria A. George, REG-DO, (E-File)
Anthony R. Grieggs, ENV-CP, (E-File)
Deborah K. Woitte, LC-ESH, (E-File)
Debra Nevergold, LTP, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Luciana Vigil-Holterman, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)

ENCLOSURE 1

List of Manifests Requiring Correction

ADESH-14-041

Date: AUG 1 3 2014

List of applicable manifest numbers, shipment numbers, dates of receipt and container numbers from Waste Stream LA-MIN02-V.001				
Manifest Number	**Shipment Number**	**Received**	**Container Number**	**Container Count**
001600826GBF	IN130186	8-Sep-13	LA00000062547	1
001600826GBF	IN130186	8-Sep-13	LA00000063116	2
001600826GBF	IN130186	8-Sep-13	LA00000063198	3
001600826GBF	IN130186	8-Sep-13	LA00000063497	4
001600826GBF	IN130186	8-Sep-13	LA00000064665	5
001600826GBF	IN130186	8-Sep-13	LA00000064863	6
001600826GBF	IN130186	8-Sep-13	LAS822714	7
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010784176JJK	LA130125	29-Aug-13	LA00000092347	10
010784176JJK	LA130125	29-Aug-13	LA00000092555	11
010784176JJK	LA130125	29-Aug-13	LA00000093588	12
010784176JJK	LA130125	29-Aug-13	LA00000093589	13
010784179JJK	LA130128	3-Sep-13	LA00000092220	14
010784180JJK	LA130129	4-Sep-13	LA00000092140	15
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010784266JJK	LA140016	29-Jan-14	LA00000068459	359
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010784268JJK	LA140017	29-Jan-14	LA00000068670	368