



ESHID-602043

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Date: **DEC 06 2016**
Symbol: EPC-DO-16-379
LA-UR: 16-29140
Locates Action No.: Not Applicable

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

Subject: Request for a 90 Day Extension of Alternative Inspection Requirements for Shed 1028 at Technical Area 54, Area G, Pad 5

Dear Mr. Kieling:

The purpose of this letter is to request a 90 day extension on the alternative inspections for waste containers stored within a portion of a permitted unit at Technical Area (TA) 54 at Los Alamos National Laboratory. Previous communications between the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC, or Permittees, and the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) regarding alternative container storage inspections being conducted at Los Alamos National Laboratory (LANL) were outlined in the *Notification of Alternative Inspection Requirements for Shed 1028 at Technical Area 54, Area G, Pad 5* (EPC-DO-16-330) letter delivered to the NMED-HWB on November 8, 2016.

As stated in communication dated November 8, 2016, the change to regularly conducted visual inspection is necessary due to a potential safety concern regarding four mixed low level waste Flanged Tritium Waste Containers (FTWCs) containing tritium that are stored within TA-54, Building 1028 (TA-54-1028). This alternative inspection extension will allow the visual inspection of TA-54-1028 rather than a complete inspection of the waste containers in accordance with LANL Hazardous Waste Facility Permit Section 2.6. Upon approval by the DOE of controlled access within TA-54-1028, visual inspections as required in Permit Section 2.6 will resume.

An additional 90 day extension for variance to the inspection requirements is requested by the Permittees because analysis is ongoing to determine acceptability of controls to prevent credible accident

sequences. Until this analysis is completed and vetted through subject matter experts, and through regulatory approval officials, the area will remain an access exclusion area for personnel safety reasons. As stated in previous communication, in addition to documenting these alternative inspections on the Inspection Record Form, the Permittees will include this information as an anticipated noncompliance pursuant to Permit Section 1.9.11 in the annual noncompliance report required by Permit Section 1.9.14. Upon approval of the safety analysis, implementation of corrective measures, and resumption of normal or alternate inspections, the Permittees will notify the NMED-HWB.

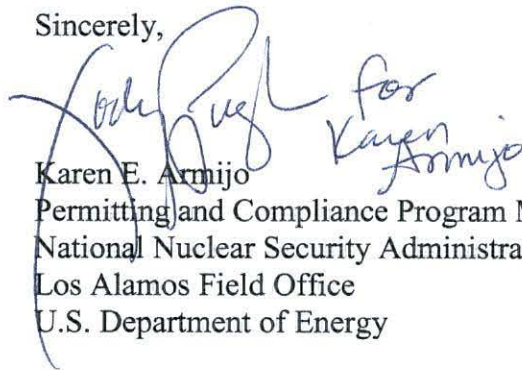
If you have comments/questions or would like to meet regarding this submittal, please contact Mark P. Haagenstad at (505) 665-2014 or Karen Armijo at (505) 665-7314.

Sincerely,



John C. Bretzke
Division Leader
Environmental Protection & Compliance Division
Los Alamos National Security, LLC

Sincerely,



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
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