

LA-UR-18-31615

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

Author(s): Goldberg, Shanon D.

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Environmental Regulatory Document

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Date: **JAN 22 2019**

Symbol: ESHQSS-18-024

LA-UR: LA-UR-18-31615

Locates Action No.:

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 January 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. 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) revisions.

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 effective dates of any revisions. As stated in Attachment A, electronic access to any and all current document revisions will be provided upon NMED request.

On November 1, 2018, Triad National Security, LLC (Triad), became the management and operations contractor for the Los Alamos National Laboratory, replacing LANS. Therefore the signed certification accompanying this correspondence has been updated to include the new Respondents.

The Respondents would be pleased to meet with NMED personnel to discuss and explain the documentation included herein. 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,

Sincerely,



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



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 January 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

1/9/19
Date Signed



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

1-17-19
Date Signed

ENCLOSURE 1

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

ESHQSS-18-024

LA-UR-18-31615

Date: JAN 22 2019

Enclosure 1

Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 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 current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.

¹ During the reporting period, the LANS Legacy Cleanup Bridge Contract (LCBC) was terminated. The new contractor, Newport News Nuclear BWXT-Los Alamos (N3B), took over the Environmental Management (DOE-EM) scope of work at LANL, including waste management activities, (i.e., RNS/UNS) covered under the SFO. While these activities were completed under the LANS LCBC prior to April 30, 2018, the reporting requirement did not sunset the list of documents subject to the semi-annual reporting requirement of the SFO. The list contained herein reflects the documents subject to the SFO semi-annual reporting requirements and is current as of December 30, 2018. None of the procedures owned by N3B were maintained or duplicated by Triad National Security, LLC.

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

ESHQSS-18-024

LA-UR-18-31615

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>	R0, 02/08/2016	None
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 for 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>	R0, 04/30/2015	None

* "None" indicates that this document has not been revised since the current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.

¹ During the reporting period, the LANS Legacy Cleanup Bridge Contract (LCBC) was terminated. The new contractor, Newport News Nuclear BWXT-Los Alamos (N3B), took over the Environmental Management (DOE-EM) scope of work at LANL, including waste management activities, (i.e., RNS/UNS) covered under the SFO. While these activities were completed under the LANS LCBC prior to April 30, 2018, the reporting requirement did not sunset the list of documents subject to the semi-annual reporting requirement of the SFO. The list contained herein reflects the documents subject to the SFO semi-annual reporting requirements and is current as of December 30, 2018. None of the procedures owned by N3B were maintained or duplicated by Triad National Security, LLC.

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
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 current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.

¹ During the reporting period, the LANS Legacy Cleanup Bridge Contract (LCBC) was terminated. The new contractor, Newport News Nuclear BWXT-Los Alamos (N3B), took over the Environmental Management (DOE-EM) scope of work at LANL, including waste management activities, (i.e., RNS/UNS) covered under the SFO. While these activities were completed under the LANS LCBC prior to April 30, 2018, the reporting requirement did not sunset the list of documents subject to the semi-annual reporting requirement of the SFO. The list contained herein reflects the documents subject to the SFO semi-annual reporting requirements and are current as of June 30, 2018. None of the procedures identified for N3B in the list were maintained or duplicated by LANS.

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

ESHQSS-18-024

LA-UR-18-31615

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	None
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

* "None" indicates that this document has not been revised since the current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.

¹ During the reporting period, the LANS Legacy Cleanup Bridge Contract (LCBC) was terminated. The new contractor, Newport News Nuclear BWXT-Los Alamos (N3B), took over the Environmental Management (DOE-EM) scope of work at LANL, including waste management activities, (i.e., RNS/UNS) covered under the SFO. While these activities were completed under the LANS LCBC prior to April 30, 2018, the reporting requirement did not sunset the list of documents subject to the semi-annual reporting requirement of the SFO. The list contained herein reflects the documents subject to the SFO semi-annual reporting requirements and is current as of December 30, 2018. None of the procedures owned by N3B were maintained or duplicated by Triad National Security, LLC.

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

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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
ADESH-AP-TOOL-300, <i>Radioactive Waste Management</i>	R0, 02/08/2016	R1, 06/12/2017
ADESH-AP-TOOL-314, <i>Radioactive Characterization of Waste</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	None
ADESH-AP-TOOL-901, <i>Elementary Neutralization</i>	R0, 01/14/2016	None
ADESH-AP-TOOL-902, <i>Sorption without a Permit</i>	R0, 12/23/2015	None
ADESH-AP-TOOL-906, <i>Treatment by the Waste Generator</i>	R0, 02/24/2016	None

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¹ During the reporting period, the LANS Legacy Cleanup Bridge Contract (LCBC) was terminated. The new contractor, Newport News Nuclear BWXT-Los Alamos (N3B), took over the Environmental Management (DOE-EM) scope of work at LANL, including waste management activities, (i.e., RNS/UNS) covered under the SFO. While these activities were completed under the LANS LCBC prior to April 30, 2018, the reporting requirement did not sunset the list of documents subject to the semi-annual reporting requirement of the SFO. The list contained herein reflects the documents subject to the SFO semi-annual reporting requirements and is current as of December 30, 2018. None of the procedures owned by N3B were maintained or duplicated by Triad National Security, LLC.



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Locates Action No.:

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 January 22, 2019**

Dear Mr. Kieling:

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