



LANL RECOVERY- REGULATORY PERSPECTIVE

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OVERVIEW

- Do not represent/speak for NMED
 - All comments are based on my previous experience
- Discussion of the following:
 - Priorities following incident at WIPP
 - Summary of Settlement Agreements
 - Regulatory role in LANL and WIPP recovery efforts
 - Lessons Learned

PRIORITIES AT LANL FOLLOWING EVENT

- Ensure Public Health and Safety
 - Continued isolation of nitrate-salt waste stream at LANL
- Regulatory Compliance/Permit Modifications
 - Treatment of Nitrate Salts
- Completion of corrective actions identified in Attachment A of Settlement Agreement and Administrative Orders

SETTLEMENT AGREEMENTS

- Signed on January 22, 2016
- Settled all alleged Permit and RCRA violations
 - LANL
 - Required DOE-NNSA to fund 5 Supplemental Environmental Projects (SEPs)
 - Roads, Surface Water Sampling, Triennial Review, Potable Water Line Replacement and Engineered Structures in Canyons
 - Totaled \$34.5 Million in projects
 - Most projects must be complete by the end of FY18
 - WIPP
 - Required DOE-EM to fund 4 SEPs
 - Roads, Emergency Operations Center, Emergency Response Training and Triennial Review
 - Totaling \$39.5 Million
 - All funds must be remitted by the end of FY17

REGULATORY ROLE IN LANL/WIPP RECOVERY

- NMED issues and enforces the RCRA Permits for LANL and WIPP
- The last 3 years, NMED has overseen recovery efforts at both facilities
 - Reviewing/Approving permit modification requests (PMRs)
 - WIPP: VOC monitoring; Contingency Plan, multiple Class 1 PMRs
 - LANL: Nitrate Salt treatment methodology, multiple Class 1 PMRs
 - Constant communication with staff from LANL and WIPP
 - At LANL – NMED participated on the integrated project team
 - Allowed to observe Readiness Reviews
 - Documented completion of corrective actions
 - SEP teams established and several work plans/addendums submitted and approved
 - LANL & WIPP provided briefings to NMED senior management on significant milestones

OBSERVATIONS/LESSONS LEARNED

- NMED approved Class 1* P/AR (treatment) on July 25, 2016
- LANL actively working to bring WCRRF online
- Studies/Experiments were critical in identifying risk factors
- Field Visits are critical
- Communication
 - Staff level
 - Senior management



QUESTIONS ?