DEFENSE NUCLEAR FACILITIES SAFETY BOARD

March 3, 2023

TO: Christopher J. Roscetti, Technical Director

FROM: Alexander Velazquez-Lozada, Cognizant Engineer

SUBJECT: Waste Isolation Pilot Plant (WIPP) Report for February 2023

DNFSB Staff Activity. The Board's staff participated in regular conference calls to maintain cognizance of site activities.

Contractor Management Transition. The new WIPP Management and Operating contractor, Salado Isolation Mining Contractors (SIMCO), successfully assumed WIPP operations on Saturday, February 4, 2023. The transition team is focusing on areas of conduct of operations, conduct of maintenance, and configuration management control. One of the objectives of the leadership team is to addresses cultural issues associated with accountability. SIMCO identified and documented preexisting-conditions before taking over operations. Some of these conditions include general housekeeping issues; poor conditions and outdated control systems in the shafts; issues with the Out of Service Program and weakness with the implementation of the Conduct of Operations Program; and issues with the Quality Control Program for capital projects.

Potential Inadequacy in the Safety Analysis (PISA) Determination. On February 22, 2023, personnel in SIMCO's Nuclear Safety Department entered the PISA process based on new information regarding the implications of the type of filter in the inner pipe-component within a pipe overpack container (POC). While there is a filtered vent on the outer drum, the subject of this PISA is the type of filter in the inner pipe-component.

The current WIPP accident consequence analysis assumes that pipe-components with sintered metal filters can contain an internal deflagration and for that reason does not include an analysis of internal deflagration events. However, per the WIPP Waste Acceptance Criteria, WIPP could receive POCs and Criticality Control Overpacks (CCO) with inner filters constructed of other media types that have not been proven to withstand an internal deflagration. By the end of this reporting period, SIMCO personnel determined that a PISA exists because the current safety basis may not be conservative since it does not consider POCs and CCOs with non-sintered stainless-steel filters. SIMCO personnel are currently preparing the Evaluation of the Safety of the Situation and Justification for Continued Operations.

As a result of this PISA, SIMCO management implemented a Long-Term Timely Order as an interim control measure to ensure affected containers remain in a safe and stable configuration. The order requires that TRUPACT shipping containers with POCs or CCOs remain in the Parking Area Unit (PAU) except when venting is required. After venting is completed, the shipping containers must be returned to the PAU. Currently, five TRUPACT shipping containers with POCs or CCOs reside in the PAU.

Permit Modification. Following requests from citizen groups last month, the New Mexico Environment Department agreed to extend the comment period by 60 days for the 10-year permit renewal for WIPP. Interested parties now have until April 19, 2023, to weigh in on the proposed permit renewal language for WIPP.