

National Nuclear Security Administration Los Alamos Field Office 3747 West Jemez Road, MS A316 Los Alamos, New Mexico 87544

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Environmental Management

Los Alamos Field Office
P.O. Box 1663, MS M984
Los Alamos, New Mexico 87545

505-257-7950/Fax 505-665-5903

**Symbol:** EPC-DO-23-191 **Date:** July 20, 2023 LA-UR -23-26337

Mr. Ricardo Maestas, Acting Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6313

Subject: Settlement Agreement and Stipulated Final Order HWB-14-20, Annual Report for Period Ending July 22, 2023 (EPA ID# NM0890010515)

Dear Mr. Maestas:

The United States Department of Energy (DOE) and its field offices, the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the Environmental Management Los Alamos Field Office (EM-LA), along with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively, the Permittees, submit the enclosed Settlement Agreement and Stipulated Final Order (SFO) HWB-14-20, Annual Report for Period Ending July 22, 2023 (Annual Report) to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB). The Annual Report is submitted as required by Attachment A of the Settlement Agreement and SFO HWB-14-20, entered into by the NMED, DOE and Los Alamos National Security, LLC (LANS) on January 22, 2016.

On November 30, 2018, operational responsibilities at Los Alamos National Laboratory (LANL) were transferred from LANS to Triad. On April 30, 2018, N3B assumed the Environmental Management scope of work at LANL. In 2020, Triad and N3B technical staff met with the NMED-HWB staff to discuss a joint (NA-LA/EM-LA) submittal of the Report to meet the NMED-HWB compliance expectations.

This Report respectfully provides required information within two enclosures. Enclosure 1 provides the current status of specific procedures outlined in Attachment A of the SFO and certification for NA-LA/Triad operations. Enclosure 2 provides the current status of specific procedures outlined in Attachment A of the SFO and certification for EM-LA/N3B operations.

This Annual Report is drafted to address many of the Ordered Actions in the SFO Attachment A that refer to specific procedures. When the 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) revision.

Enclosures 1 and 2 list all procedures revised since they were initially submitted to the NMED-HWB as part of the Ordered Action responses, including the revised effective dates. As stated in Attachment A, electronic access to all current document revisions will be provided by the respective respondent upon request by the NMED-HWB.

It was agreed that the Respondents would provide the required document list on January 22 and July 22 of each year; however, the NMED-HWB updated the reporting requirements as of August 31, 2020, pursuant to ESHID-603595, "Respondents have met the notification requirements of the Settlement Agreement and Stipulated Final Order HWB-14-20. NMED is reducing the frequency of reporting from semi-annual to annual."

If you have questions or comments concerning the NA-LA/Triad Enclosure 1 submittal, please contact Robert A. Gallegos (NA-LA) at (505) 901-3824, robert.gallegos@nnsa.doe.gov or Kristen A. Honig (Triad) at (505) 667-8775, khonig@lanl.gov.

If you have questions or comments concerning the EM-LA/N3B Enclosure 2 submittal, please contact Arturo Duran (EM-LA) at 505-257-7907, arturo.duran@em.doe.gov or Christian Maupin (N3B) at 505-695-4281, christian.maupin@em-la.doe.gov.

Sincerely,

## Robert A. Gallegos Gallegos

Digitally signed by Robert A.

Date: 2023.07.20 11:04:52 -06'00'

Robert A. Gallegos

Environmental Permitting and Compliance Program Manager National Nuclear Security Administration Los Alamos Field Office

U.S. Department of Energy

Sincerely,



Digitally signed by BRIAN HARCEK Date: 2023.07.14 12:36:15 -06'00'

Brian Harcek, Acting Co-Director Office of Quality and Regulatory Compliance **Environmental Management** Los Alamos Field Office U.S. Department of Energy

#### RAG/BH/SLS/CMA

Enclosures:

- (1) List of Triad Documents in Stipulated Final Order Attachment A Subject to the Annual Reporting Requirement with NA-LA/Triad Certification
- (2) List of N3B Documents in Stipulated Final Order Attachment A Subject to the Annual Reporting Requirement with EM-LA/N3B Certification

#### CC w/enclosures:

Rick Shean, NMED-HWB, Santa Fe, NM, rick.shean@env.nm.gov Ricardo Maestas, NMED-HWB, Santa Fe, NM, ricardo.maestas@env.nm.gov Neelam Dhawan, NMED-HWB, Santa Fe, NM, neelam.dhawan@env.nm.gov Siona Briley, NMED-HWB, Santa Fe, NM, siona.briley@env.nm.gov Mitchell Schatz, NMED-HWB, Santa Fe, NM, mitchell.schatz@env.nm.gov Theodore A. Wyka, NA-LA, theodore.wyka@nnsa.doe.gov Stephen Hoffman, NA-LA, stephen.hoffman@nnsa.doe.gov Jason Saenz, NA-LA, jason.saenz@nnsa.doe.gov Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov

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2905 Rodeo Park Drive East, Building 1

Subject: Settlement Agreement and Stipulated Final Order HWB-14-20, Annual Report for Period Ending July 22, 2023 (EPA ID# NM0890010515)

Dear Mr. Maestas:

The United States Department of Energy (DOE) and its field offices, the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the Environmental Management Los Alamos Field Office (EM-LA), along with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively, the Permittees, submit the enclosed Settlement Agreement and Stipulated Final Order (SFO) HWB-14-20, Annual Report for Period Ending July 22, 2023 (Annual Report) to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB). The Annual Report is submitted as required by Attachment A of the Settlement Agreement and SFO HWB-14-20, entered into by the NMED, DOE and Los Alamos National Security, LLC (LANS) on January 22, 2016.

On November 30, 2018, operational responsibilities at Los Alamos National Laboratory (LANL) were transferred from LANS to Triad. On April 30, 2018, N3B assumed the Environmental Management scope of work at LANL. In 2020, Triad and N3B technical staff met with the NMED-HWB staff to discuss a joint (NA-LA/EM-LA) submittal of the Report to meet the NMED-HWB compliance expectations.

This Report respectfully provides required information within two enclosures. Enclosure 1 provides the current status of specific procedures outlined in Attachment A of the SFO and certification for NA-LA/Triad operations. Enclosure 2 provides the current status of specific procedures outlined in Attachment A of the SFO and certification for EM-LA/N3B operations.

This Annual Report is drafted to address many of the Ordered Actions in the SFO Attachment A that refer to specific procedures. When the 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) revision.



## **ENCLOSURE 1**

## **NA-LA/Triad**

List of Triad Documents in Stipulated Final Order Attachment A
Subject to the Annual Reporting Requirement with
NA-LA/Triad Certification

Date: July 20, 2023

LA-UR-23-26337



### Action required (per Stipulated Final Order Attachment A):

"Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revisions.

NMED ESHID-603595, dated August 21, 2020 "The Respondents have met the notification requirements of the Settlement Agreement and Stipulated Final Order HWB-14-20. NMED is reducing the frequency of reporting from semi-annual to annual [...]."

#### When due:

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 A	Action 1.12	
ENV-CP-QP-115, Compliance Technical Assistance	ENV-CP-QP-115, R0, 09/28/2015	<ul> <li>ENV-CP-QP-115, cancelled 10/10/2017</li> <li>EPC-WMP-QP-115, R0, 12/04/2018</li> <li>EPC-WMP-QP-115, R1, 08/27/2019</li> <li>EPC-WMP-QP-115, R2, 12/20/2021</li> </ul>

Document Title	Version Submitted with 3/22/2016 Ordered Action	Revisions and Effective Date since Submittal
ADESH-AP-TOOL-803, Facility TSF Operating Record; superseded by AP-P409-1000, R0, Facility Operating Record Requirements for Waste Documentation	ADESH-AP- TOOL-803, R0, 12/15/2015	<ul> <li>ADESH-AP-TOOL-803, R1, 08/11/2017</li> <li>AP-P409-1000, R0, 11/06/2020</li> <li>AP-P409-1000, R1, 01/27/2021</li> <li>AP-P409-1000, VAR-1, 03/24/2022</li> </ul>
EWMO-AP-20284, EWMO RCRA Permit Operating Record and Compliance Programs*; superseded by N3B-AP-20284, R0, effective 04/30/2018	R0, 03/08/2016	• Newport News Nuclear BWXT-Los Alamos, LLC (N3B) Blue sheet: R0, 04/30/2018; supersedes EWMO-AP-20284, Triad EWMO-AP-20284, R0, cancelled 09/06/2018  *See N3B's list of documents for updates.

Document Title	Version Submitted with 3/22/2016 Ordered Action	Revisions and Effective Date since Submittal			
Ordered	Ordered Action 1.13				
ADESH-AP-TOOL-117, Using WCATS to Submit Change Requests; ADESH-AP-TOOL-117, R1, revised document title to Managing Operating Record Changes in WCATS; superseded by AP-P409-1000, R0, Facility Operating Record Requirements for Waste Documentation	ADESH-AP- TOOL-117, R0, 02/08/2016	<ul> <li>ADESH-AP-TOOL-117, R1, 04/12/2019</li> <li>AP-P409-1000, R0, 11/06/2020</li> <li>AP-P409-1000, R1, 01/27/2021</li> </ul>			
Ordered	d Action 1.14				
ENV-CP-AP-200, R1, Regulatory Procedure Review of Waste Management Procedures; superseded by ADESH-AP-014, R0, Regulatory Review of Waste Management Compliance Work Control Documents; superseded by ESH-AP-014, R0, Regulatory Review for Waste Management Compliance Work Control Documents	ENV-CP-AP-200, R1, 09/15/2015	• ADESH-AP-014, R0, 11/02/2017 • ESH-AP-014, R0, 01/28/2021			
Ordered	d Action 1.16				
P850, Subcontract Technical Representative Procedure	Not submitted	<ul> <li>P850, R6, 11/7/2016</li> <li>P850, R6, Admin Change 1, 11/02/2018</li> <li>P850, R7, 10/31/2019</li> <li>P850, R8, 11/13/2020</li> <li>P850, R8, Admin Change 1, 05/16/2022</li> <li>P850, R9, 10/10/2022</li> </ul>			
Order	ed Action 5				
MAN-5004, WCATS User's Manual; superseded by EPC-WMP-WCATS-GUIDE-002, R0, Waste Compliance and Tracking System (WCATS) User Guide	MAN-5004, R3, 07/16/2015	<ul> <li>MAN-5004, R4, 10/31/2017; betatest version of on-line manual posted to LANL Yellow Network 08/06/2018</li> <li>EPC-WMP-WCATS-GUIDE-002, R0, 04/30/2020</li> <li>EPC-WMP-WCATS-GUIDE-002, R1, 10/22/2020</li> </ul>			
WM-SVS-AP-201, Reviewing and Approving Waste Stream Profiles (WSPs) in WCATS; WM-SVS-AP-201, R1, revised document title to Reviewing and Approving Waste Stream Profiles (WSP) in WCATS by RCRA Reviewers; superseded by FSD-P409-0400, R0, Waste Determination and Categorization	WM-SVS-AP-201, R0, 04/30/2015	• WM-SVS-AP-201, R1, 11/28/2018 • FSD-P409-0400, R0, 04/05/2021			

Document Title	Version Submitted with 3/22/2016 Ordered Action	Revisions and Effective Date since Submittal
Orc	dered Action 9	
P409, LANL Waste Management	P409, R5, 07/30/2015	<ul> <li>P409, R6, 04/21/2017</li> <li>P409, R7, 11/29/2017</li> <li>P409, R7, Admin Change 1, 04/11/2018</li> <li>P409, R7, Admin Change 2, 07/26/2018</li> <li>P409, R7, Admin Change 3, 11/01/2018</li> <li>P409, R7, Admin Change 4, 04/11/2019</li> <li>P409, R7, Admin Change 5, 02/18/2020</li> <li>P409, R8, Provisional, 04/30/2021</li> <li>P409, R8, Admin Change 1, 10/01/2021</li> <li>P409, R8, Admin Change 2, 11/30/2021</li> <li>P409, R8, Admin Change 3, 01/07/2022</li> <li>P409, R8, Admin Change 4, 08/22/2022</li> <li>P409, R8, Admin Change 5, 11/28/2022</li> </ul>
P315, Conduct of Operations Manual	P315, R6, 07/08/2015	<ul> <li>P315, R6, Admin Change 1, 06/13/2017</li> <li>P315, R7, 05/09/2018</li> <li>P315, R7, Admin Change 1, 06/11/2018</li> <li>P315, R7, Provisional, 05/09/2018</li> <li>P315, R7, Admin Change 1, 06/11/2018</li> <li>P315, R7, Admin Change 2, 07/23/2018</li> <li>P315, R7, Admin Change 3, 11/01/2018</li> <li>P315, R7, Admin Change 3, 11/01/2018</li> <li>P315, R7, Admin Change 4, 04/01/2020</li> </ul>

Document Title	Version Submitted with 3/22/2016 Ordered Action	Revisions and Effective Date since Submittal		
Ordered Action 9 (continued)				
EP-AP-10007, ADEP Technical Procedure Development; superseded by N3B-AP-ENS-10007, R0, N3B document title revised to Technical Procedure Development*	EP-AP-10007, R0, 08/13/2015	<ul> <li>EP-AP-10007, R2, 11/21/2016</li> <li>EP-AP-10007, R2.1, 07/11/2017</li> <li>N3B Blue sheet: R2.1, 07/11/2017</li> <li>Triad EP-AP-10007 cancelled 04/30/2018</li> <li>N3B Blue sheet procedure superseded by N3B-AP-ENS-10007, R0, effective 09/17/2019</li> <li>*See N3B's list of documents for updates.</li> </ul>		
ENV-CP-AP-200, R1, Regulatory Procedure Review of Waste Management Procedures; superseded by ADESH-AP-014, R0, Regulatory Review for Waste Management Compliance Work Control Documents; superseded by ESH-AP-014, R0, Regulatory Review for Waste Management Compliance Work Control Documents	ENV-CP-AP-200, R1, 09/15/2015	• ADESH-AP-014, R0, 11/02/2017 • ESH-AP-014, R0, 01/28/2021		
EM-AP-10001, ADEP Document Control (Rev. 0, formerly EP-AP-10001); superseded by N3B-P311-1, R0, N3B document title revised in N3B Blue sheet process to Document Control*	EM-AP-10001, R0, 08/13/2015	<ul> <li>EM-AP-10001, R1, 02/01/2017</li> <li>N3B Blue sheet: R1, 05/26/2018</li> <li>Triad EM-AP-10001, R1, cancelled 04/30/2018</li> <li>N3B Blue sheet document superseded by N3B-P311-1, R0, effective 10/11/2018.</li> <li>N3B-P311-1, R1, 02/06/2019</li> <li>N3B-P311-1, R2, 03/31/2020</li> <li>N3B-P311-1, R3, 5/12/2021</li> <li>*See N3B's list of documents for updates.</li> </ul>		
WM-AP-0005, Waste Characterization and Processing Review; superseded by EPC-WMP-AP-005, R2, Waste Characterization and Processing Review  EPC-WMP-005, Waste Characterization and Processing Review, formerly, WM-AP-005, was implemented as a response action to:  • Develop procedures to implement an acceptable knowledge (AK) communication system within and between appropriate LANL organizations, including subcontractors, to ensure that AK documentation is accurate, sufficient, and updated, and  • to provide addition to the procedures and policies that ensure the proper LANL organizations and	WM-AP-0005, R1, 02/18/2016	<ul> <li>EPC-WMP-AP-005, R2, 10/16/2019, cancelled 06/19/2023</li> <li>All listed below are active replacements:</li> <li>FSD-P409-0305, Acceptable Knowledge Package Requirements for NNSS Low-Level/Mixed Low-Level Waste, R1, 08/17/2021</li> <li>TA55-RD-539, TA-55 FOD Waste Management Requirements, R9, 03/08/2021</li> <li>PA-AP-01146, Acceptable Knowledge Documentation Procedure, R2, 08/23/2022</li> <li>AP-P409-0101, Difficult Waste</li> </ul>		

Document Title	Version Submitted with 3/22/2016 Ordered Action	Revisions and Effective Date since Submittal
subject matter experts review and then approve or reject proposed waste management procedural changes.		Streams, R1, 05/15/2023
The Laboratory has implemented functions in other procedures across the Laboratory to fully ensure Resource Conservation Recovery Act (RCRA) compliance, reduce hazards, improve safety associated with LANL waste processing and management, and the review and compliant resolution of complex waste issues related to waste characterization and processing and ensure communication between those processes. These implementations ensure waste stream profile AK documentation is accurate, sufficient, and updated. These procedures are in place to include the requirements such that the EPC-WMP-005 procedure is no longer necessary to bridge communications between waste characterization and processing. The newly listed procedures continue to ensure that waste stream profiles, associated documentation, and waste processing procedures are thoroughly reviewed by subject matter experts.		
Procedures to ensure the applicable ordered actions are continued include the following for which status has already been reported herein.  • P409, LANL Waste Management  • ESH-AP-014, Regulatory Review for Waste Management Compliance Work Control Documents  • IG-P409-0002, Waste Management Glossary  • FSD-P409-0300, Waste Characterization and Compatibility  • IG-P409-0233, Management of Universal Waste  • IG-P409-0234, Management of Used Oil for Recycle  • IG-P409-0235, Hazardous Waste Determinations for Waste Generators  • FSD-P409-0201, Radioactive Waste Management  • AP-P409-1000, Facility Operating Record Requirements for Waste Documentation  • FSD-P409-0800, Waste Treatment Decision Making	ADESIL IG	ADESH IC TOOL 101 P1
ADESH-IG-TOOL-101, Waste Management Glossary; superseded by IG-P409-0002, R0, Waste Management Glossary	ADESH-IG- TOOL-101, R0, 12/10/2015	• ADESH-IG-TOOL-101, R1, 02/26/2019 • IG-P409-0002, R0, 04/01/2021

Document Title	Version Submitted with 3/22/2016 Ordered Action	Revisions and Effective Date since Submittal		
Ordered Action 9 (continued)				
ADESH-AP-TOOL-111, Waste Characterization; superseded by FSD-P409-0300, R0, Waste Characterization and Compatibility	ADESH-AP- TOOL-111, R0, 12/15/2015	• ADESH-AP-TOOL-111, R1, 08/2/2018 • FSD-P409-0300, R0, 05/19/2021		
ADESH-AP-TOOL-115, Waste Compatibility Determination; superseded by FSD-P409-0300, R0, Waste Characterization and Compatibility	ADESH-AP- TOOL-115, R0, 01/14/2016	<ul> <li>ADESH-AP-TOOL-115, R0, R1, 02/01/2018</li> <li>FSD-P409-0300, R0, 05/19/2021</li> </ul>		
ADESH-AP-TOOL-206, Management of Hazardous Waste by Generator; superseded by IG-P409-0233, R0, Management of Universal Waste, IG-P409-0234, R0, Management of Used Oil for Recycle, and IG-P409-0235, R0, Hazardous Waste Determinations for Waste Generators  Replacement and reorganization of P409, LANL Waste Management revision resulted in specific subject areas to be updated and moved to functional series documents to consolidate and streamline subject areas which include the following: FSD-P409-0300, R0, Waste Characterization and Compatibility FSD-P409-0600, R0, Waste Accumulation and Storage	ADESH-AP- TOOL-206, R0, 12/15/2015	<ul> <li>ADESH-AP-TOOL-206, R1, 08/02/2018</li> <li>ADESH-AP-TOOL-206, R2, 04/12/2019</li> <li>All listed below are active replacements:</li> <li>IG-P409-0233, R0, 08/25/2021</li> <li>IG-P409-0234, R0, 08/25/2021</li> <li>IG-P409-0234 VAR-1, 03/24/2022</li> <li>IG-P409-0235, R0, 08/10/2021</li> <li>FSD-P409-0300, R0, 05/19/2021</li> <li>FSD-P409-0600, R0, 05/19/2021</li> <li>FSD-P409-0600 VAR-1, 03/24/2022</li> </ul>		
ADESH-AP-TOOL-300, Radioactive Waste Management; superseded by FSD-P409-0201, R0, Radioactive Waste Management	ADESH-AP- TOOL-300, R0, 02/08/2016	<ul> <li>ADESH-AP-TOOL-300, R1, 06/12/2017</li> <li>FSD-P409-0201, R0, 05/31/2021</li> <li>FSD-P409-0201, R1, 01/24/2023</li> </ul>		
ADESH-AP-TOOL-314, Radioactive Waste Characterization; superseded by FSD-P409-0300, R0, Waste Characterization and Compatibility	ADESH-AP- TOOL-314, R0, 02/10/2016	<ul> <li>ADESH-AP-TOOL-314, R1, 06/28/2018</li> <li>FSD-P409-0300, R0, 05/19/2021</li> </ul>		
ADESH-AP-TOOL-803, Facility TSF Operating Record; superseded by AP-P409-1000, R0, Facility Operating Record Requirements for Waste Documentation	ADESH-AP- TOOL-803, R0, 12/15/2015	<ul> <li>ADESH-AP-TOOL-803, R1, 08/11/2017</li> <li>AP-P409-1000, R0, 11/06/2020</li> <li>AP-P409-1000, R1, 01/27/2021</li> <li>AP-P409-1000 VAR-1, 03/24/2022</li> </ul>		
ADESH-AP-TOOL-810, Waste Processing at LANL Hazardous Waste Permitted Units; superseded by FSD-P409-0800, R0, Waste Treatment Decision Making	ADESH-AP- TOOL-810, R0, 01/14/2016	• ADESH-AP-TOOL-810, R1, 01/29/2019 • FSD-P409-0800, R0, 05/18/2021		
ADESH-AP-TOOL-901, Elementary Neutralization; superseded by FSD-P409-0800, R0, Waste Treatment Decision Making	ADESH-AP- TOOL-901, R0, 01/14/2016	<ul> <li>ADESH-AP-TOOL-901, R1, 02/26/2019</li> <li>FSD-P409-0800, R0, 05/18/2021</li> </ul>		
ADESH-AP-TOOL-902, Sorption without a Permit; superseded by FSD-P409-0800, R0, Waste Treatment Decision Making	ADESH-AP- TOOL-902, R0, 12/23/2015	• ADESH-AP-TOOL-902, R1, 02/26/2019 • FSD-P409-0800, R0, 05/18/2021		

Document Title	Version Submitted with 3/22/2016 Ordered Action	Revisions and Effective Date since Submittal
ADESH-AP-TOOL-906, Treatment by the Waste Generator; superseded by FSD-P409-0800, R0, Waste Treatment Decision Making	ADESH-AP- TOOL-906, R0, 02/24/2016	<ul> <li>ADESH-AP-TOOL-906, R1, 03/13/2019</li> <li>FSD-P409-0800, R0, 05/18/2021</li> </ul>

<sup>\*</sup>Newport News Nuclear BWXT-Los Alamos (N3B), assumed Environmental Management (EM-LA) scope of work at LANL on April 30, 2018.



# **CERTIFICATION**



### 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.

STEVEN STORY (Affiliate)

Digitally signed by STEVEN STORY (Affiliate) Date: 2023.07.12 15:37:14 -06'00'

7/12/2023

Date Signed

Steven L. Story

Acting Division Leader Environmental Protection and Compliance Division Triad National Security, LLC Los Alamos National Laboratory

Robert A. Gallegos Digitally signed by Robert A.

Date: 2023.07.20 11:05:36 -06'00'

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Robert A. Gallegos

Environmental Permitting and Compliance Program Manager National Nuclear Security Administration Los Alamos Field Office U.S. Department of Energy Date Signed

## **ENCLOSURE 2**

## EM-LA/N3B

List of N3B Documents in Stipulated Final Order Attachment A Subject to the Annual Reporting Requirement with Certification

Date: July 20, 2023

Document Title*	Version Submitted With 3/22/2016 Ordered Action*	N3B Documents with Revisions and Effective Date Since EM Transition 4/30/18*
Ordered Action 1.12		
ENV-CP-QP-115, Compliance Technical Assistance Program (CTAP) Procedure; replaced by EPC-WMP-QP-115, R0. Title revised in R1 to Compliance Technical Assistance Process (CTAP)	R0, 09/28/2015	Assessments, including RCRA, are performed per N3B-P328-3, R3, 05/21/2021, Management and Independent Assessment
ADESH-AP-TOOL-803, Facility TSF Operating Record	R0, 12/15/2015	Incorporated into N3B-P409-0, R0 04/09/2019
		R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022
EWMO-AP-20284, EWMO RCRA Permit Operating Record and Compliance Programs	R0, 03/08/2016	Blue sheet: N3B-AP- 20284, R0 04/30/2018
		N3B-AP-TRU-1008, R0 12/04/2020
Ordered Action 1.13		
ADESH-AP-TOOL-117, Using WCATS to Submit Change Requests. Revision 1 changed document title to Managing Operating Record Changes in WCATS	R0, 02/08/2016	Incorporated into N3B-P409-0, R0 04/09/2019 R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022
Ordered Action 1.14		
ENV-CP-AP-200, Regulatory Procedure Review of Waste Management Procedures superseded by ADESH-AP-014, Regulatory Review of Waste Management Compliance Work Control Documents	R1, 09/15/2015	Procedure review requirements, including specified reviewer assignments provided in N3B-AP-ENS-10007, R0 09/17/2019
		Superseded by N3B-AP- BUS-10007, R0 11/09/2022
Ordered Action 1.16		
P850, Subcontract Technical Representative Procedure	Not submitted	Blue sheet: P850, R6 04/30/2018
		N3B-P850, R0 07/11/2019
		R1, 07/15/2021

Ordered Action 5		
MAN-5004, WCATS User's Manual; document superseded by EPC-WMP-WCATS-GUIDE-002, Waste Compliance and Tracking System (WCATS) User Guide, R0	R3, 07/16/2015	R4, 10/31/2017; Beta- Test Version of On-line Manual posted to LANL Yellow Network 08/06/2018
		N3B uses Triad documents to access and comply with WCATS system requirements
		Waste Compliance and Tracking System (WCATS) User Guide, R0 04/30/2020;
		R1, 10/22/2020
WM-SVS-AP-201, Reviewing and Approving Waste Stream Profiles (WSPs) in WCATS. Revision 1 changed document title to Reviewing and Approving Waste Stream Profiles (WSP) in WCATS by RCRA Reviewers superseded by;	R0, 04/30/2015	N3B uses Triad documents to access and comply with WCATS system requirements
FOR PAGE 6400 PO W. C. D. C.		R1, 11/28/2018
FSD-P409-0400, R0, Waste Determination and Categorization		FSD-P409-0400, R0 04/05/2021
Ordered Action 9		
P409, LANL Waste Management	R5, 07/30/2015	Blue sheet: P409, R7, 04/30/2018
		N3B-P409-0, R0 04/09/2019
		R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022
P315, Conduct of Operations Manual	R6, 07/08/2015	Blue sheet: P315, R7 04/30/2018
		N3B-P315, R0 04/24/2019
EP-AP-10007, ADEP Technical Procedure Development	R0, 08/13/2015	Blue sheet: N3B-EP-AP- 10007, R2.1, 04/30/2018
		Superseded by N3B-AP- ENS-10007, R.0 09/17/2019
		Superseded by N3B-AP- BUS-10007, R0 11/09/2022

ENV-CP-AP-200, R1, Regulatory Procedure Review of Waste Management Procedures superseded by ADESH-AP-014, Regulatory Review for Waste Management Compliance Work Control Documents	R1, 09/15/2015	Procedure review requirements, including specified reviewer assignments, in N3B-AP-ENS-10007, R0 09/17/2019 Superseded by N3B-AP-BUS-10007, R0, 11/09/2022
EM-AP-10001, ADEP Document Control	R0, 08/13/2015	N3B Blue sheet: N3B-EM-AP-10001, 04/30/2018 Superseded by N3B-P311-1, R0 10/11/2018 R1, 02/06/2019 R2, 03/31/2020 R3, 05/12/2021 R4, 03/31/2022 R5, 08/04/2022
WM-AP-0005, Waste Characterization and Processing Review. Document identifier revised to EPC-WMP-AP-005, R2, Waste Characterization and Processing Review	R1, 02/18/2016	EPC-WMP-AP-005, R2, 10/16/2019, Maintained by LANL
ADESH-IG-TOOL-101, Waste Management Glossary	R0, 12/10/2015	Incorporated into N3B-P409-0, R0 04/09/2019 R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022
ADESH-AP-TOOL-111, Waste Characterization	R0, 12/15/2015	Incorporated into N3B-P409-0, R0 04/09/2019 R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022
ADESH-AP-TOOL-115, Waste Compatibility Determination	R0, 01/14/2016	Incorporated into N3B-P409-0, R0 04/09/2019 R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022
ADESH-AP-TOOL-206, Management of Hazardous Waste by Generators	R0, 12/15/2015	Incorporated into N3B-P409-0, R0 04/09/2019 R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022

ADESH-AP-TOOL-300, Radioactive Waste Management	R0, 02/08/2016	Incorporated into N3B-P409-0, R0 04/09/2019 R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022
ADESH-AP-TOOL-314, Radioactive Waste Characterization	R0, 02/10/2016	Incorporated into N3B-P409-0, R0,04/09/2019 R1, 11/17/2020 R2, 03/10/2022 R3, 05/05/2022
ADESH-AP-TOOL-803, Facility TSF Operating Record	R0, 12/15/2015	R1, 08/11/2017; Facility permit direction and requirements are sufficient for N3B operations
ADESH-AP-TOOL-810, Waste Processing at LANL Hazardous Waste Permitted Units	R0, 01/14/2016	R1, 01/29/2019; Facility permit direction and requirements are sufficient for N3B operations
ADESH-AP-TOOL-901, Elementary Neutralization	R0, 01/14/2016	R1, 02/26/2019 Controlled by the permitting process

<sup>\*</sup>Newport News Nuclear BWXT-Los Alamos (N3B), assumed Environmental Management (EM-LA) scope of work at LANL on April 30, 2018.

# **CERTIFICATION**

### 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.

15

Digitally signed by BRIAN HARCEK Date: 2023.07.14 12:37:34 -06'00'

07/14/2023

Date Signed

**Brian Harcek, Acting Co-Director**Office of Quality and Regulatory Compliance

Environmental Management Los Alamos Field Office

U.S. Department of Energy