



Department of Energy  
Carlsbad Field Office  
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Carlsbad, New Mexico 88221

MAR 19 2004



Mr. Steve Zappe  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505

Subject: Response to Stakeholder and EEG Comments on the Permit Modification  
Request Entitled "Upgrade Waste Conveyance Loading Car"

Dear Mr. Zappe:

Enclosed are the responses to stakeholder and Environmental Evaluation Group (EEG) comments for the Upgrade Waste Conveyance Loading Car permit modification request.

If you have any questions, please contact me at (505) 234-7300.

Sincerely,

*Chuan-Fu Wu for*  
R. Paul Detwiler  
Acting Manager

Enclosure

cc: w/enclosure  
J. Plum, CBFO  
R. Chavez, WRES  
CBFO M&RC



**Response to Comments on the Allow the Use of Either Track or Non-Track Mounted  
Conveyance Cars Permit Modification Request**

**Public Meeting Comments:**

**February 17, 2004: Carlsbad, NM**

**Comment 1.** Is the new vehicle track operated?

**Response.** No, the new vehicle will operate on hard rubber tires.

**Comment 2.** Will the new vehicle be used to move pallets from TRUDOCKs?

**Response.** It will have that capability; however, it is likely that forklifts will continue to be used for this function.

**February 19, 2004, Early Session: Santa Fe, NM**

**Comment 1.** How long will the new equipment last?

**Response.** Similar equipment has been successfully used at Hanford for 5 years without significant maintenance problems.

**February 19, 2004, Late Session: Santa Fe, NM**

No comments/questions were provided on the Upgrade Waste Conveyance Loading Car PMR.

**EEG Written Comments:**

**Comment 1.** Upgrade of the Waste Conveyance Loading Car (Class 2) The Permittees are requesting to use either the current waste conveyance loading car or to use an automated conveyance car. In addition, a different nomenclature is proposed, that is to change from "conveyance loading car" to facility transfer vehicle. The current waste conveyance loading car has been in operation for a number of years and the Permittees indicate that it is now difficult to obtain spare parts. The Permittees may wish to consider selecting another name for the vehicle in order to avoid any confusion. Perhaps Facility Pallet Transfer Vehicle or Pallet Transfer Vehicle might be appropriate. Moreover, the waste handling capability of the Facility Transfer Vehicle will be reduced from 36,000 pounds to 26,000 pounds, a payload reduction of 28% (Table M2-1, Waste Handling Equipment Capabilities). This means that both the existing conveyance loading car and the new automated vehicle will be limited to 26,000 pound payload. It would be reasonable to explain why the existing conveyance vehicle payload will be reduced by 28%.

**Response.** The term Facility Transfer Vehicle was coined based on the function of the equipment to transfer or move wastes and materials (e.g., facility pallets) within the Waste Handling Building (facility) by the personnel responsible for using this equipment. The changes in the capacity address the maximum anticipated loading of the facility pallet (4,400 pounds) and the contents of two loaded Type B Packages (7,600 pounds each) for a total of 19,600 pounds, well below the 26,000 pounds capacity. Furthermore, Attachment M1-1(c)(1) requires

"WIPP facility operational documents [to] define the operational load of the facility pallet to ensure that the rated load of a facility pallet is not exceeded." These operational documents also address loading of equipment used for waste handling.

**Comment 2.** Appendix D, (information on typical automated vehicles) is mentioned on pages 1 and 2 in the PMR text. Appendix D is not listed in the Table of Contents and is not included in the PMR. It would be useful to have this information available.

**Response.** The Appendix D was in an earlier version of the PMR, however, the DOE did not believe it contained information not addressed in Appendix C. The reference to Appendix D should have been removed from the submitted version of this PMR.