



ENVIRONMENTAL EVALUATION GROUP

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

7007 WYOMING BOULEVARD, N.E.
SUITE F-2
ALBUQUERQUE, NEW MEXICO 87109
(505) 828-1003
FAX (505) 828-1062

December 4, 2002

Dr. Inés Triay
Manager
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221

Dear Dr. Triay:

The DOE is proposing a Class 1 permit modification request to extend the period of time to complete closure of Panel 1. As a part of this proposal, the DOE plans to construct, at the inlet and outlet of the panel, only the 12 ft explosion isolation wall until the EPA and NMED act upon the previously submitted panel closure design modification. The process for the EPA and NMED could require a few years. The current permit allows 180 days for completion of the 12 ft isolation explosion walls and the permanent closure walls.

As you know, the New Mexico Environment Department convened a meeting of interested parties on November 15, 2002 to obtain public comment on the draft Class 1* PMR. During that meeting the EEG, the State Attorney General's Office and others raised concerns about the lack of an engineering analysis on the 12 ft wall to ensure that it would perform sufficiently for the necessary time period until a panel closure design decision would be made. It is our understanding, that an engineering analysis of the twelve foot isolation explosion wall will be completed by DOE in the near future, probably before the first of the year. Meanwhile, the DOE submitted the Class 1* PMR on November 21, 2002, offering as additional proof of wall structural integrity, the performance of other walls built in the WIPP underground that have remained intact for more than five years.

The EEG requests an opportunity to examine each of these walls with appropriate DOE personnel. In addition to this examination, we are requesting any comparison analyses that may have been performed which would identify wall similarities, e.g. wall widths and thicknesses, ground conditions, horizon location relative to Panel 1 etc. As the DOE



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is requesting timely action by the NMED on the Class 1* PMR, the EEG would like to schedule this examination as soon as a mutually agreeable date can be achieved.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew K. Silva', written in a cursive style.

Matthew K. Silva
Director

MKS:LA:pf

cc: Elizabeth Forinash, EPA-ORIA
Jody Plum, DOE
Stan Patchet, WTS
Steve Zappe, NMED