



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
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 JUN 30 2005

ENTERED



Mr. Steve Zappe, Project Leader (WIPP)
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 E. Rodeo Park Drive, Building 1
 Santa Fe, NM 87505-6303

Subject: Permittees' Comments on the September 17, 2004, Hazardous Waste Facility Permit, No. NM4890139088- TSDF, Construction and Use of Hazardous Waste Disposal Units

Dear Mr. Zappe:

This letter and enclosure constitute additional Permittees' comments on the draft Hazardous Waste Facility Permit (No. NM4890139088- TSDF) for the Waste Isolation Pilot Plant that was published by the New Mexico Environment Department (NMED) on September 17, 2004. These comments are being submitted by the U.S. Department of Energy and Washington TRU Solutions, LLC, Co. Permittees, pursuant to 20.4.1.901 New Mexico Administrative Code (NMAC).

The Permittees support the draft permit that was issued by NMED on September 17, 2004. As a result of recent discussions with NMED and in response to stakeholders' comments, the Permittees support two changes to the draft permit and earlier comments.

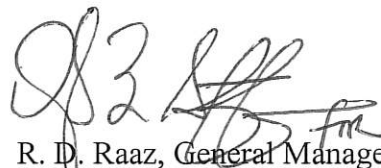
First, the Permittees have identified the need to update the Anticipated Earliest Closure Dates For The HWDUs (Table I-1) and NOTE 5 of Table I-1 to be consistent with the planning assumptions that went into the February 24, 2005 Class 1* Permit Modification – Panel 2 Closure which is currently under NMED review and the *Waste Isolation Pilot Plant Mine Long Term Schedule*, February 2005 Report, Rev. 0.

Second, the Permittees have identified the need to modify Table I-2 of Permit Attachment I to include anticipated overall schedule of closure activities consistent with those in Table I-1. The exact desired changes are attached. The need to modify Figure I-3 of Attachment I at a future date as a Class 1 has been discussed with you as well.

Please contact us if you have any questions regarding these comments.

Sincerely,


 Ines R. Triay, Acting Manager
 Carlsbad Field Office


 R. D. Raaz, General Manager
 Washington TRU Solutions LLC

Enclosure



JUN 3 0 2005

Mr. Steve Zappe

-2-

cc:

J. Bearzi, NMED *ED

J. Kieling, NMED ED

A. Shannauer, NMED ED

T. Hughes, NMED ED

CBFO M & RC

*ED denotes electronic distribution



**WASTE ISOLATION PILOT PLANT
MINE LONG TERM PLAN (MLTP) SCHEDULE
ROOM BY ROOM UPDATE
February 2005 Report Revision 0**

CONTACT-HANDLED (CH) WASTE EMPLACEMENT SCHEDULE				MINING ACTIVITIES							
PANEL AND ROOM NUMBER		START	FULL (7days/week)	STATUS	DESCRIPTION	EXCAVATION			OUTFITTING		CERTIFICATION
						Start Date	End Date	Duration	Start	End	Completion
PANEL 1	P1 RM6	8/24/01	11/11/01	Complete	North End (E-0 only)	---	9/30/03	---	---	---	---
	P1 RM5	11/12/01	1/18/02	Complete	South Mains to S-3310	N/C	1/30/03	---	---	---	---
	P1 RM4	1/19/02	2/26/02	Complete	South Mains to S-3650	7/2/04	1/28/05	wks	---	---	---
	P1 RM3	2/27/02	7/18/02	Complete	Panel 3	1/31/03	7/1/04	73.9	9/7/04	1/14/05	2/27/05
	P1 RM2	7/19/02	11/22/02	Complete	Panel 4	1/29/05	4/17/06	63.3	3/17/06	6/17/06	7/17/06
	P1 RM1	11/23/02	3/12/03	Complete	Panel 5	4/18/06	6/5/07	59.0	5/5/07	8/5/07	9/4/07
PANEL 2	P2 RM7	3/13/03	7/16/03	Complete	Panel 6	6/6/07	7/23/08	59.0	6/22/08	9/22/08	10/22/08
	P2 RM6	7/17/03	11/12/03	Complete	Panel 7	7/24/08	12/19/09	73.3	11/18/09	2/18/10	3/20/10
	P2 RM5	11/13/03	4/5/04	Complete	Panel 8	12/20/09	5/16/11	73.3	4/16/11	7/16/11	8/15/11
	P2 RM4	4/6/04	7/16/04	Complete	Panel 9 Ribs/Floor	5/17/11	2/23/12	40.2	1/23/12	4/24/12	5/24/12
	P2 RM3	7/17/04	11/11/04	Complete	Panel 10 Ribs/Floor	2/24/12	9/25/12	30.7	8/26/12	11/25/12	12/25/12
	P2 RM2	11/12/04	4/10/05								
PANEL 3	P3 RM7	6/10/05	8/15/05								
	P3 RM6	8/16/05	10/29/05								
	P3 RM5	10/30/05	2/6/06								
	P3 RM4	2/7/06	4/21/06								
	P3 RM3	4/22/06	7/8/06								
	P3 RM2	7/9/06	9/25/06								
PANEL 4	P4 RM7	11/25/06	2/25/07								
	P4 RM6	2/26/07	5/14/07								
	P4 RM5	5/15/07	8/3/07								
	P4 RM4	8/4/07	10/25/07								
	P4 RM3	10/26/07	2/7/08								
	P4 RM2	2/8/08	4/27/08								
PANEL 5	P5 RM7	6/19/08	9/2/08								
	P5 RM6	9/3/08	11/27/08								
	P5 RM5	11/28/08	2/26/09								
	P5 RM4	2/27/09	5/10/09								
	P5 RM3	5/11/09	7/17/09								
	P5 RM2	7/18/09	9/19/09								
PANEL 6	P6 RM7	11/2/09	2/6/10								
	P6 RM6	2/7/10	4/3/10								
	P6 RM5	4/4/10	6/8/10								
	P6 RM4	6/9/10	8/11/10								
	P6 RM3	8/12/10	10/18/10								
	P6 RM2	10/19/10	1/24/11								
PANEL 7	P7 RM7	1/25/11	2/27/11								
	P7 RM6	2/28/11	5/6/11								
	P7 RM5	5/7/11	7/9/11								
	P7 RM4	7/10/11	9/14/11								
	P7 RM3	9/15/11	11/23/11								
	P7 RM2	11/24/11	2/12/12								
PANEL 8	P8 RM7	2/13/12	4/19/12								
	P8 RM6	4/20/12	6/4/12								
	P8 RM5	6/5/12	8/12/12								
	P8 RM4	8/13/12	10/25/12								
	P8 RM3	10/26/12	2/6/13								
	P8 RM2	2/7/13	4/21/13								
PANEL 9	P9 RM3	4/22/13	6/29/13								
	P9 RM2	6/30/13	9/7/13								
	P9 RM1	9/8/13	1/15/14								
PANEL 10	-	1/16/14	1/15/26								
PANEL 10 Filled to:		21.69%	1/16/28	9/30/30							

NOTES

WASTE FORECASTS USED FOR THE MINE LONG TERM PLAN:

- Emplacement dates based on the following CH and RH waste forecasts:
 - A. CH: FY2005 WIPP TRU Shipping Schedule REV4
 - B. CH: FY06-Dec15 - CBFO 87TScenarioFY06-11Rev1.xls
 - C. CH: Jan16 to FY30 - Drivers & Assumptions 9/8/03
 - D. RH: CBFO 87TScenarioFY06-11Rev1.xls with Drivers & Assumptions 9/8/03 June FY 13 - FY 30
- Newly generated RH waste converted to and emplaced as CH waste.
- Newly generated RH waste; one canister contains three 85-gal drums; one 4-pack of 85-gal drums equals one 7-pack of 55-gal drums, two 4-packs of 85-gal drums per TRUPACT II
- Only (1) one RH canister per hole.
- Forecast RH start date is February, 2007.
- Second mining crew to panel development Jan05.
- All of Panel 9 and 75% of Panel 10 drifts widened to 33' to accommodate RH emplacement.
- Mining completed in September 2012. Geotechnical and Ground Control Maintenance must continue through the life of the facility.

**WASTE ISOLATION PILOT PLANT
MINE LONG TERM PLAN (MLTP) SCHEDULE
RH ROOM BY ROOM UPDATE
February 2005 Report Revision 0**

REMOTE HANDLED (RH) WASTE EMPLACEMENT SCHEDULE				RH BORING SCHEDULE			
PANEL AND ROOM NUMBER	START	FULL (7days/week)	STATUS	PANEL AND ROOM NUMBER	START	END	DURATION (WORK WEEKS)
PANEL 2	P2 RM7			PANEL 2	RH BORING PANEL 2 - RM7		
	P2 RM6				RH BORING PANEL 2 - RM6		
	P2 RM5				RH BORING PANEL 2 - RM5		
	P2 RM4				RH BORING PANEL 2 - RM4		
	P2 RM3				RH BORING PANEL 2 - RM3		
	P2 RM2				RH BORING PANEL 2 - RM2		
	P2 RM1				RH BORING PANEL 2 - RM1		
PANEL 3	P3 RM7			PANEL 3	RH BORING PANEL 3 - RM7		
	P3 RM6				RH BORING PANEL 3 - RM6		
	P3 RM5				RH BORING PANEL 3 - RM5		
	P3 RM4				RH BORING PANEL 3 - RM4		
	P3 RM3				RH BORING PANEL 3 - RM3		
	P3 RM2				RH BORING PANEL 3 - RM2		
	P3 RM1	7/10/06	9/26/06		RH BORING PANEL 3 - RM1	7/10/06	9/26/06
PANEL 4 RH Start Date	P4 RM7	9/27/06	11/25/06	PANEL 4 RH Boring Start Date	RH BORING PANEL 4 - RM7	7/10/06	9/26/06
	P4 RM6	2/1/07	2/26/07		RH BORING PANEL 4 - RM6	11/26/06	1/24/07
	P4 RM5	2/27/07	5/15/07		RH BORING PANEL 4 - RM5	1/25/07	2/26/07
	P4 RM4	5/16/07	8/4/07		RH BORING PANEL 4 - RM4	2/27/07	5/15/07
	P4 RM3	8/5/07	10/26/07		RH BORING PANEL 4 - RM3	5/16/07	8/4/07
	P4 RM2	10/27/07	2/8/08		RH BORING PANEL 4 - RM2	8/5/07	10/26/07
	P4 RM1	2/9/08	4/18/08		RH BORING PANEL 4 - RM1	10/27/07	2/8/08
PANEL 5	P5 RM7	4/19/08	6/19/08	PANEL 5	RH BORING PANEL 5 - RM7	2/9/08	4/18/08
	P5 RM6	6/20/08	9/3/08		RH BORING PANEL 5 - RM6	4/19/08	6/19/08
	P5 RM5	9/4/08	11/28/08		RH BORING PANEL 5 - RM5	6/20/08	9/3/08
	P5 RM4	11/29/08	2/27/09		RH BORING PANEL 5 - RM4	9/4/08	11/28/08
	P5 RM3	2/28/09	5/11/09		RH BORING PANEL 5 - RM3	11/29/08	2/27/09
	P5 RM2	5/12/09	7/18/09		RH BORING PANEL 5 - RM2	2/28/09	5/11/09
	P5 RM1	7/19/09	9/20/09		RH BORING PANEL 5 - RM1	5/12/09	7/18/09
PANEL 6	P6 RM7	9/21/09	11/2/09	PANEL 6	RH BORING PANEL 6 - RM7	7/19/09	9/20/09
	P6 RM6	11/3/09	1/9/10		RH BORING PANEL 6 - RM6	9/21/09	11/2/09
	P6 RM5	1/10/10	3/16/10		RH BORING PANEL 6 - RM5	11/3/09	1/9/10
	P6 RM4	3/17/10	6/3/10		RH BORING PANEL 6 - RM4	1/10/10	3/16/10
	P6 RM3	6/4/10	8/12/10		RH BORING PANEL 6 - RM3	3/17/10	6/3/10
	P6 RM2	8/13/10	10/19/10		RH BORING PANEL 6 - RM2	6/4/10	8/12/10
	P6 RM1	10/20/10	12/6/10		RH BORING PANEL 6 - RM1	8/13/10	10/19/10
PANEL 7	P7 RM7	12/7/10	2/23/11	PANEL 7	RH BORING PANEL 7 - RM7	10/20/10	12/6/10
	P7 RM6	2/24/11	5/2/11		RH BORING PANEL 7 - RM6	12/7/10	2/23/11
	P7 RM5	5/3/11	7/9/11		RH BORING PANEL 7 - RM5	2/24/11	5/2/11
	P7 RM4	7/10/11	9/15/11		RH BORING PANEL 7 - RM4	5/3/11	7/9/11
	P7 RM3	9/16/11	11/24/11		RH BORING PANEL 7 - RM3	7/10/11	9/15/11
	P7 RM2	11/25/11	2/8/12		RH BORING PANEL 7 - RM2	9/16/11	11/24/11
	P7 RM1	2/9/12	3/25/12		RH BORING PANEL 7 - RM1	11/25/11	2/8/12
PANEL 8	P8 RM7	3/26/12	6/5/12	PANEL 8	RH BORING PANEL 8 - RM7	2/9/12	3/25/12
	P8 RM6	6/6/12	8/13/12		RH BORING PANEL 8 - RM6	3/26/12	6/5/12
	P8 RM5	8/14/12	10/26/12		RH BORING PANEL 8 - RM5	6/6/12	8/13/12
	P8 RM4	10/27/12	1/6/13		RH BORING PANEL 8 - RM4	8/14/12	10/26/12
	P8 RM3	1/7/13	3/15/13		RH BORING PANEL 8 - RM3	10/27/12	1/6/13
	P8 RM2	3/16/13	5/25/13		RH BORING PANEL 8 - RM2	1/7/13	3/15/13
	P8 RM1	5/26/13	7/14/13		RH BORING PANEL 8 - RM1	3/16/13	5/25/13
PANEL 9	-	7/15/13	2/28/15	PANEL 9	RH BORING PANEL 9	5/26/13	12/30/14
PANEL 10	46.41%	3/1/15	12/31/15	PANEL 10	RH BORING PANEL 10	12/31/14	11/1/15