



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

ENTERED

RECEIVED

FEB 10 2014

FEB 10 2014

NMED
Hazardous Waste Bureau

OFFICE OF
AIR AND RADIATION

Mr. Jose Franco, Manager
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221-3090

Dear Mr. Franco:

On January 22, 2014, DOE and EPA staff participated in an informal technical exchange in Carlsbad, New Mexico. The primary topic of discussion was related to the upcoming 2014 WIPP Compliance Recertification Application. During this exchange DOE staff also requested information on the Agency's review of DOE's proposed WIPP Repository Reconfiguration Planned Change Request (PCR), submitted to EPA for review on August 30, 2011. The PCR included the PC3R Performance Assessment (PA), which combined the requests to modify the current 'Option D' Panel Closure System and relocate Waste Panels 9 and 10 to the south of existing Waste Panels 4 and 5.

The Agency conducted a preliminary review of the proposed repository reconfiguration component in DOE's PC3R analysis. The Agency has identified several issues (see the enclosure) related to DOE's modeling of the waste panel reconfiguration that would require further justification or supporting documentation in any additional technical analyses submitted by DOE in support of the PCR. Depending on the scope of the changes that DOE ultimately decides to include in a future reconfiguration PA, the DOE may need to submit the changes to a peer review before the new PA is submitted to EPA, similar to what was done with the Technical Baseline Migration about ten years ago.

If you have any questions, please contact Kathy Economy at 202-343-9844 or economy.kathleen@epa.gov.

Sincerely,

Tom Peake, Director
Center for Waste Management and Regulations

Enclosure



03/10/2008

Cc: George Basabilvazo, DOE CBFO
Russ Patterson, DOE CBFO
Alton Harris, DOE HQ
Tris Kliphuis, NMED
Nick Stone, EPA Region 6
Jonathan Edwards, EPA HQ
Raymond Lee, EPA HQ
Kathy Economy, EPA HQ
Jon Walsh, EPA HQ
Shankar Ghose, EPA HQ

USE100 9100W 2008 03 10

EPA Comments Related to DOE's PC3R Analysis of WIPP Repository Reconfiguration

Reconfiguration Aspect in the PC3R PA	EPA Comments
Borehole penetration of a non-waste repository region and also a Castile brine reservoir	This human induced event was not considered and could noticeably increase waste panel direct brine releases (DBR)
Repository dip	The exclusion of this important feature affecting long-term performance from the Salado flow model was not adequately justified
Creep closure of non-waste areas	An updated screening analysis of this process should be performed because of changes that have occurred since the Compliance Certification Application
Salado flow model grid changed to a west-east orientation	The specific impacts of this change on modeling results were not identified
Salado flow model grid flaring changed	These changes were not adequately described and justified
Treatment of shaft in Salado flow model grid	The numerical treatment of the shaft and its potential role in inhibiting flow was not adequately described and justified
Repository dip included in DBR model grid	The impact of including dip in the DBR model and excluding it in the Salado flow model was not adequately described
Transfer of initial conditions from Salado flow model to DBR model	The impacts of the differences in treatment of repository dip between the two models on transfer of initial conditions were not described
Conceptual models and their implementation	DOE should identify how cumulative changes in the modeling and consideration of features, events and processes (FEPs) modify the implementation of the conceptual models, and—depending on what changes DOE ultimately includes in a future reconfiguration PA—DOE may need to consider using a peer review similar to what was done with the Technical Baseline Migration about ten years ago