

Department of Energy

Carlsbad Field Office P. O. Box 3090 Carlsbad, New Mexico 88221 March 31, 2020

Mr. Kevin Pierard, Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, New Mexico 87505

Subject: Resource Conservation and Recovery Act Ten-Year Renewal Application for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Number NM4890139088-TSDF

Dear Mr. Pierard:

The purpose of this letter is to submit the *Resource Conservation and Recovery Act Ten-Year Renewal Application for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit.* The Renewal Application is being submitted pursuant to Permit Part 1, Section 1.7.3., *Duty to Reapply*:

If the Permittees wish to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittees shall apply for and obtain a new Permit. The Permittees shall submit an application for a new Permit at least 180 calendar days before the expiration date of this Permit. [20.4.1.900 NMAC (incorporating 40 CFR §§270.10(h), 270.30(b))]

Those portions of the renewal application that include proposed revisions to the current permit are provided in redline/strikeout format.

Enclosed are three paper copies of the application and both a CD and a USB drive containing the application, as well as the supplemental information used to prepare the application. This information will also be posted on the Waste Isolation Pilot Plant (WIPP) Information Repository pursuant to Permit Part 1, Section 1.14., where it can be accessed electronically.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our 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 our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Mr. Pierard

-2-

If you have any questions, please contact Mr. Michael R. Brown at (575) 234-7476.

Gregory Sosson Acting Manager Carlsbad Field Office

Enclosures (5)

cc: w/o enclosures R. Maestas, NMED *ED D. Biswell, NMED ED M. McLean, NMED ED CBFO M&RC *ED denotes electronic distribution Sincerely,

Sean Dunagan President and Project Manager Nuclear Waste Partnership LLC

RESOURCE CONSERVATION AND RECOVERY ACT TEN-YEAR RENEWAL APPLICATION FOR THE WASTE ISOLATION PILOT PLANT HAZARDOUS WASTE FACILITY PERMIT

Prepared by the U.S. Department of Energy, Carlsbad Field Office and Nuclear Waste Partnership LLC

> for the WASTE ISOLATION PILOT PLANT Eddy County, New Mexico

> > March 2020

TABLE OF CONTENTS

TABLE OF CONTENTS

List of Tables

List of Figures

List of Drawings

Abbreviations and Acronyms

Introduction

Regulatory Requirements Crosswalk

Summary of Proposed Changes

Part A Application

Information Required by 40 CFR Part 270, §270.13, Contents of Part A of the Permit Application

Form OMB# 2050-0024, RCRA Subtitle C Site Identification Form and Hazardous Waste Permit Part A Form

RCRA Part A Application Certification

Appendix 1 Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of March 2020

Appendix 2 Maps

Appendix 3 Facilities

Appendix 4 Photographs

Part B Application

Information Required for the WIPP Facility Ten-Year Renewal Application, Part B

Maps and Illustrations

Maps and Illustrations Crosswalk

Demographics

Drawings

Public Participation Information

Attachment A: General Facility Description and Process Information

TABLE OF CONTENTS (continued)

Attachment A1: Container Storage

Attachment A2: Geologic Repository

Attachment A3: Traffic Patterns

Attachment B: Reserved for Permit Attachment B, Hazardous Waste Permit Application Part A

Attachment C: Waste Analysis Plan

Attachment C1: Waste Characterization Testing Methods

Attachment C2: Reserved

Attachment C3: Quality Assurance Objectives and Data Validation Techniques for Waste Characterization Methods

Attachment C4: TRU Mixed Waste Characterization Using Acceptable Knowledge

Attachment C5: Quality Assurance Project Plan Requirements

Attachment C6: Audit and Surveillance Program

Attachment C7: TRU Waste Confirmation

Addendum C1: Dispute Resolution

Attachment D: RCRA Contingency Plan

Addendum D1: Preparedness and Prevention

Attachment E: Inspection Schedule, Process and Forms

Addendum E1: Security

Attachment F: Facility Personnel Permit Training Program

Attachment G: Closure Plan

Attachment G1: WIPP Panel Closure Design Description and Specifications

Appendix G1-A: Technical Specifications

Appendix G1-B: Drawings

Attachment G2: Waste Isolation Pilot Plant Shaft Sealing System Compliance Submittal Design Report

TABLE OF CONTENTS

(continued)

Appendix G2-A: Material Specification

Appendix G2-B: Shaft Sealing Construction Procedures

Appendix G2-E: Design Drawings

Attachment G3: Radiological Surveys to Indicate Potential Hazardous Waste Releases

Addendum G1: Need for Additional Panels for the Ten-Year Hazardous Waste Facility Permit Renewal

Attachment H: Post-Closure Plan

Attachment H1: Active Institutional Controls During Post-Closure

Attachment I: Reserved for Permit Attachment I, Compliance Schedule

Attachment J: Reserved for Permit Attachment J, Hazardous Waste Management Unit Tables

Attachment K: Reserved for Permit Attachment K, Solid Waste Management Unit (SWMU) and Area of Concern (AOC) Tables

Attachment L: WIPP Groundwater Detection Monitoring Program Plan

Addendum L1: Site Characterization

Attachment M: Figures

Attachment N: Volatile Organic Compound Monitoring Plan

Addendum N1: 300-Year Performance Demonstration Re-Evaluation

Attachment O: WIPP Mine Ventilation Rate Monitoring Plan

LIST OF TABLES

LIST OF TABLES

ATTACHMENT A1 CONTAINER STORAGE

- A1-1 TRU Mixed Waste Containers
- A1-2 CH TRU Mixed Waste Handling Equipment Capacities
- A1-3 RH TRU Mixed Waste Handling Equipment Capacities

ATTACHMENT A2 GEOLOGIC REPOSITORY

- A2-1 CH TRU Mixed Waste Handling Equipment Capacities
- A2-2 Instrumentation Used in Support of the Geomechanical Monitoring System
- A2-3 RH TRU Mixed Waste Handling Equipment Capacities

ATTACHMENT C WASTE ANALYSIS PLAN

- C-1 Summary of Parameters, Characterization Methods, and Rationale for Transuranic Mixed Waste
- C-2 Required Program Records Maintained in Generator/Storage Site Project Files
- C-3 WIPP Waste Information System Data Fields
- C-4 Waste Tanks Subject to Exclusion
- C-5 Listing of Permitted EPA Hazardous Waste Numbers

ATTACHMENT C3

QUALITY ASSURANCE OBJECTIVES AND DATA VALIDATION TECHNIQUES FOR WASTE CHARACTERIZATION METHODS

- C3-1 Waste Material Parameters and Descriptions
- C3-2 Minimum Training and Qualifications Requirements
- C3-3 Testing Batch Data Report Contents

ATTACHMENT C6 AUDIT AND SURVEILLANCE PROGRAM

- C6-1 Waste Analysis Plan (WAP) General Checklist for use at DOE's
- Generator/Storage Sites
- C6-2 Acceptable Knowledge (AK) Checklist
- C6-3 Radiography Checklist
- C6-4 Visual Examination (VE) Checklist

ATTACHMENT D RCRA CONTINGENCY PLAN

- D-1 Resource Conservation and Recovery Act Emergency Coordinators
- D-2 Emergency Equipment Maintained at the Waste Isolation Pilot Plant

ATTACHMENT E INSPECTION SCHEDULE, PROCESS AND FORMS

- E-1 Inspection Schedule/Procedures
- E-1a RH TRU Mixed Waste Inspection Schedule/Procedures

ATTACHMENT F FACILITY PERSONNEL PERMIT TRAINING PROGRAM

- F-1 TRU Mixed Waste Management and Emergency Response Job Titles and Descriptions
- F-2 Permit-Required Training Courses

ATTACHMENT G CLOSURE PLAN

- G-1 Anticipated Earliest Closure Dates for the Underground HWDUs
- G-2 Anticipated Overall Schedule for Final Facility Closure Activities
- G-3 Governing Regulations for Borehole Abandonment

ATTACHMENT G1

WIPP PANEL CLOSURE DESIGN DESCRIPTION AND SPECIFICATIONS

- G1-1 WIPP Panel Closure Technical Specifications
- G1-2 WIPP Panel Closure Drawings

APPENDIX G1-A TECHNICAL SPECIFICATIONS

1 Minimum ROM Salt Lengths

ATTACHMENT G2 WASTE ISOLATION PILOT PLANT SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

- G2-1 Salado Brine Seepage Intervals
- G2-2 Permeability and Thickness of Hydrostratigraphic Units in Contact with Seals
- G2-3 Freshwater Head Estimates in the Vicinity of the Air Intake Shaft
- G2-4 Chemical Formulas, Distributions, and Relative Abundance of Minerals in the Rustler and Salado Formations (after Lambert, 1992)
- G2-5 Major Solutes in Selected Representative Groundwater from the Rustler Formation and Dewey Lake Redbeds, in mg/L (after Lambert, 1992)
- G2-6 Variations in Major Solutes in Brines from the Salado Formation, in mg/L (after Lambert, 1992)
- G2-7 Shaft Sealing System Design Guidance
- G2-8 Drawings Showing Configuration of Existing WIPP Shafts (Drawings are in Appendix G2-E)
- G2-9 Summary of Information Describing Existing WIPP Shafts

- G2-10 Drawings Showing the Sealing System for Each Shaft (Drawings are in Appendix G2-E)
- G2-11 Drawings Showing the Shaft Station Monoliths (Drawings are in Appendix G2-E)
- G2-12 Summary of Results from Performance Model

APPENDIX G2-A MATERIAL SPECIFICATION

- A-1 Concrete Mixture Proportions
- A-2 Standard Specifications for Concrete Materials
- A-3 Chemical Composition of Expansive Cement
- A-4 Requirements for Salado Mass Concrete Aggregates
- A-5 Target Properties for Salado Mass Concrete
- A-6 Test Methods Used for Measuring Concrete Properties During and After Mixing
- A-7 Test Methods Used for Measuring Properties of Hardened Concrete
- A-8 Representative Bentonite Composition
- A-9 Asphalt Component Specifications
- A-10 Ultrafine Grout Mix Specification

ATTACHMENT G3

RADIOLOGICAL SURVEYS TO INDICATE POTENTIAL HAZARDOUS WASTE RELEASES

- G3-1 Summary of Waste Generation Processes and Waste Forms
- G3-2 Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-II/HalfPACT)
- G3-2a Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-III)
- G3-3 Radiological Surveys During RH TRU Mixed Waste Processing

ADDENDUM G1

NEED FOR ADDITIONAL PANELS FOR THE TEN-YEAR HAZARDOUS WASTE FACILITY PERMIT RENEWAL

- Table 1 Permitted, Actual, and Lost CH-TRU Mixed Waste Volume
- Table 2Lost TRU Mixed Waste Volume Capacity in Equivalent Panels

ATTACHMENT L

WIPP GROUNDWATER DETECTION MONITORING PROGRAM PLAN

- L-1 Hydrological Parameters for Rock Units above the Salado at the WIPP Site
- L-2 WIPP Groundwater Detection Monitoring Program Sample Collection and Groundwater Surface Elevation Measurement Frequency
- L-3 Standard Operating Procedures Applicable to the DMP
- L-4 List of Culebra Wells in the WLMP, Current as of January 2020
- L-5 Details of Construction for the Six Culebra Detection Monitoring Wells
- L-6 Analytical Parameter and Sample Requirements

ADDENDUM L1 SITE CHARACTERIZATION

- L1-1 Culebra Wells Plugged, Abandoned, Replaced, or Repaired (2013 2019)
- L1-2 Seismic Activity in the Delaware Basin (1926 2019)
- L1-3 Wells Plugged, Abandoned, and/or Reconfigured (2008 2012)

ATTACHMENT N VOLATILE ORGANIC COMPOUND MONITORING PLAN

- N-1 Target Analytes and Methods for Repository VOC (Station VOC-C and VOC-D) Monitoring and Disposal Room VOC Monitoring
- N-2 Quality Assurance Objectives for Accuracy, Precision, Sensitivity, and Completeness

ATTACHMENT O WIPP MINE VENTILATION RATE MONITORING PLAN

O-1 Mine Ventilation Rate Testing Equipment

200318

LIST OF FIGURES

LIST OF FIGURES

PART A APPLICATION

- 2-1 General Location of the WIPP Facility
- 2-2 Topographic Map with Underground Facilities (March 2020)
- 2-3 Planimetric Map-WIPP Facility Boundaries
- 3-1 Spatial View of the WIPP Facility
- 3-2 Waste Handling Building Unit- TRU Mixed Waste Container Storage and Surge Areas
- 3-3 Parking Area Unit TRU Mixed Waste Container Storage and Surge Areas
- 3-4 RH Hot Cell Storage Area
- 3-5 RH Canister Transfer Cell Storage Area and Waste Transport Route
- 3-6 Repository Horizon
- 3-7 Typical Disposal Panel
- 4-1 Aerial Photograph of the Waste Isolation Pilot Plant
- 4-2 Underground Panel 7 Panel Entry
- 4-3 Aerial Photograph of the Waste Handling Building
- 4-4 TRUDOCK (East) in CH Bay of the Waste Handling Building
- 4-5 NE Corner of CH Bay of the Waste Handling Building
- 4-6 Waste Shaft Conveyance Loading Facility Pallet with CH TRU Waste, Waste Handling Building
- 4-7 RH Bay
- 4-8 Cask Unloading Room and Bridge Crane
- 4-9 Hot Cell
- 4-10 Transfer Cell
- 4-11 Facility Cask Loading Room and Facility Cask Rotating Device

ATTACHMENT C WASTE ANALYSIS PLAN

- C-1 WIPP Waste Stream Profile Form (Example Only)
- C-2 Waste Characterization Process
- C-3 TRU Mixed Waste Screening and Verification

ATTACHMENT C4

TRU MIXED WASTE CHARACTERIZATION USING ACCEPTABLE KNOWLEDGE

- C4-1 Compilation of Acceptable Knowledge Documentation
- C4-2 Acceptable Knowledge Auditing

ATTACHMENT C7 TRU WASTE CONFIRMATION

C7-1 Overview of Waste Confirmation

ATTACHMENT D RCRA CONTINGENCY PLAN

- D-1 WIPP Surface Structures
- D-1-NFB WIPP Surface Structures with Building 416
- D-2 Spatial View of the WIPP Facility
- D-3 Underground Escape and Evacuation Map
- D-4 Fire-Water Distribution System
- D-4-NFB Fire-Water Distribution System with Building 416
- D-5 RH Bay Evacuation Routes
- D-6 RH Bay Hot Cell Evacuation Route
- D-7 Evacuation Routes in the Waste Handling Building
- D-8 WIPP Site Evacuation Routes

ATTACHMENT G2

WASTE ISOLATION PILOT PLANT SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

- G2-1 View of the WIPP Underground Facility
- G2-2 Location of the WIPP in the Delaware Basin
- G2-3 Chart Showing Major Stratigraphic Divisions, Southeastern New Mexico
- G2-4 Generalized Stratigraphy of the WIPP Site Showing Repository Level
- G2-5 Arrangement of the Air Intake Shaft Sealing System
- G2-6 Multi-deck Stage Illustrating Dynamic Compaction
- G2-7 Multi-deck Stage Illustrating Excavation for Asphalt Waterstop
- G2-8 Drop Pattern for 6-m-Diameter Shaft Using a 1.2-m-Diameter Tamper
- G2-9 Plan and Section Views of Downward Spin Pattern of Grout Holes
- G2-10 Plan and Section Views of Upward Spin Pattern of Grout Holes
- G2-11 Example of Calculation of an Effective Salt Column Permeability from the Depth-Dependent Permeability at a Point in Time
- G2-12 Effective Permeability of the Compacted Salt Column using the 95% Certainty Line

APPENDIX G2-A MATERIAL SPECIFICATIONS

- G2A-1 Schematic of the WIPP Shaft Seal Design
- G2A-2 Cumulative Distribution Function for SMC
- G2A-3 Sodium Bentonite Permeability Versus Density
- G2A-4 Cumulative Frequency Distribution for Compacted Bentonite
- G2A-5 Asphalt Permeability Cumulative Frequency Distribution Function
- G2A-6 Fractional Density of the Consolidating Salt Column
- G2A-7 Permeability of Consolidated Crushed Salt as a Function of Fractional Density
- G2A-8 Compacted Salt Column Permeability Cumulative Frequency Distribution Function at Seal Midpoint 100 Years Following Closure

APPENDIX G2-B SHAFT SEALING CONSTRUCTION PROCEDURES

- G2B-1 Multi-Deck Stage Illustrating Dynamic Compaction
- G2B-2 Multi-Deck Stage Illustrating Excavation for Asphalt Waterstop
- G2B-3 Typical Fibercrete at Top of Asphalt
- G2B-4 Drop Pattern for 6-m-Diameter Shaft Using a 1.2-m-Diameter Tamper

- G2B-5 Plan and Section Views of Downward Spin Pattern of Grout Holes
- G2B-6 Plan and Section Views of Upward Spin Pattern of Grout Holes

ADDEDUM G1

NEED FOR ADDITIONAL PANELS FOR THE TEN-YEAR HAZARDOUS WASTE FACILITY PERMIT RENEWAL

- Figure 1 Status of Panels at the WIPP Facility
- Figure 2 Panel 1 Showing Waste Emplacement and Abandoned Rooms
- Figure 3 Panel 7 Showing Waste Emplacement and Abandoned Rooms (as of 3/1/2020)

ADDEDUM L1 SITE CHARACTERIZATION

- L1-1 Map of WIPP Area Showing Diffusion Corrected Kr-81 Age
- L1-2 Ranking of Steel-cased Well Locations with Three Metrics
- L1-3 Average Water Composition and Ionic Strength for Water Quality Samples Taken from Geologic Units above the Salado Formation
- L1-4 Ionic Strength versus UTM Easting Coordinate for Water Quality Samples from Wells above the Salado Formation
- L1-5 Locations of WIPP Wells and Wellpads
- L1-6 Culebra Well Downhole Pressure Transducer Data Coverage
- L1-7 Water Levels in Culebra Wells North of the WIPP Site
- L1-8 Water Levels in Culebra Wells in the Central Portion of the WIPP Site
- L1-9 WQSP-6A Dewey Lake Water Levels
- L1-10 Bell Canyon Water Levels

ATTACHMENT M FIGURES

- M-1 Waste Handling Building Unit TRU Mixed Waste Container Storage and Surge Areas
- M-2 Parking Area Unit TRU Mixed Waste Container Storage and Surge Areas
- M-3 Standard 55-Gallon Drum (Typical)
- M-4 Standard Waste Box
- M-5 Ten-Drum Overpack
- M-6 85-Gallon Drum
- M-7 100-Gallon Drum
- M-8 Typical Standard Large Box 2
- M-9 Facility Canister Assembly
- M-10 RH-TRU 72-B Canister Assembly
- M-11 Typical Shielded Container
- M-12 Waste Handling Building Plan (Ground Floor)
- M-13 RH Bay Ground Floor and Waste Transport Routes
- M-14 RH Hot Cell Storage Area
- M-15 RH Canister Transfer Cell Storage Area and Waste Transport Route
- M-16 RH Facility Cask Loading Room and Cask Unloading Storage Area and Waste Transport Route
- M-17 TRUPACT-II Type B Shipping Container
- M-18 Typical HalfPACT Type B Shipping Container

- M-19 Typical TRUPACT-III Type B Shipping Container
- M-20 Payload Transfer Station
- M-21 Facility Pallet
- M-22 Typical Containment Pallet
- M-23 Facility Transfer Vehicle, Facility Pallet, and Typical Pallet Stand
- M-24 Typical Yard Transfer Vehicle
- M-25 RH TRU 72-B Shipping Cask on Trailer
- M-26 CNS 10-160B Shipping Cask on Trailer
- M-27 RH-TRU 72-B Type B Shipping Cask
- M-28 CNS 10-160B Type B Shipping Cask
- M-29 RH Transuranic Waste Facility Cask and Light Weight Facility Cask
- M-30 RH Shielded Insert Assembly
- M-31 CNS 10-160B Drum Carriage
- M-32 RH-TRU 72-B Cask Transfer Car
- M-33 CNS 10-160B Cask Transfer Car
- M-34 RH Facility Cask Transfer Car (Side View)
- M-35 Transfer Cell Shuttle Car
- M-36 Facility Cask Rotating Device
- M-37 TRUPACT-II Containers on Trailer
- M-38 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram
- M-39 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram (Continued)
- M-40 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for RH-TRU 72-B Shipping Cask
- M-41 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for CNS 10 160B Shipping Cask
- M-42 Typical Disposal Panel
- M-43 Repository Horizon and Underground Waste Transport Routes
- M-44 Spatial View of the Miscellaneous Unit and Waste Handling Facility
- M-45 Typical MgO Backfill Sacks Emplaced on Drum Stacks and Emplacement Configurations
- M-46 Waste Transfer Cage to Transporter
- M-47 Push-Pull Attachment to Forklift to Allow Handling of Waste Containers
- M-48 Typical RH and CH TRU Mixed Waste Container Disposal Configuration
- M-49 Underground Ventilation System Airflow
- M-50 Underground Ventilation System Airflow (with SVS)
- M-51 Typical Room Barricade
- M-52 Underground Ventilation System Airflow (with Building 416)
- M-53 Typical RH Emplacement Equipment
- M-54 RH TRU Waste Facility Cask Unloading from Waste Shaft Conveyance
- M-55 Section of Borehole Showing the RH Shield Plug and Supplemental Shielding Plate(s)
- M-56 General Location of the WIPP Facility
- M-57 WIPP Traffic Flow Diagram
- M-58 WIPP Traffic Flow Diagram with Building 416
- M-59 Typical CH Mixed Waste Transport Routes in Waste Handling Building -Container Storage Unit
- M-60 WIPP Panel Closure Schedule

- M-61 WIPP Facility Final Closure 84-Month Schedule
- M-62 Typical Substantial Barrier and Bulkhead
- M-63 Typical Shaft Sealing System
- M-64 Perimeter Fenceline and Roadway
- M-65 WIPP Facility Boundaries Showing 16-square-Mile Land Withdrawal Boundary
- M-66 Site Geologic Column
- M-67 Generalized Stratigraphic Cross Section above the Bell Canyon Formation at the WIPP Site
- M-68 Culebra Freshwater-Head Potentiometric Surface
- M-69 Detection Monitoring Well Locations
- M-70 As-Built Configuration of Well WQSP-1
- M-71 As-Built Configuration of Well WQSP-2
- M-72 As-Built Configuration of Well WQSP-3
- M-73 As-Built Configuration of Well WQSP-4
- M-74 As-Built Configuration of Well WQSP-5
- M-75 As-Built Configuration of Well WQSP-6
- M-76 Groundwater Level Surveillance Wells (inset represents the Groundwater Level Surveillance Wells within the WIPP Land Withdrawal Area)
- M-77 Repository VOC Monitoring Locations
- M-78 Typical Disposal Room VOC Monitoring Locations
- M-79 Disposal Room Sample Head Arrangement
- M-80 VOC Monitoring System Design
- M-81 VOC Monitoring System Design (continued)

ADDENDUM N1

300-YEAR PERFORMANCE DEMONSTRATION RE-EVALUATION

- N1-1 Predicted Average Pressure in Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA
- N1-2 Predicted Average Cumulative Moles of Gas Generated in the Southernmost Waste Panel for the PABC-2004 and CRA-2014 PA
- N1-3 Predicted Average Cumulative Brine Inflow into the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA
- N1-4 Predicted Average Porosity in the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA
- N1-5 Predicted Average Brine Saturation in the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA

LIST OF DRAWINGS

LIST OF DRAWINGS

PART B APPLICATION

22-V-001-W	Underground Mine Plan Structure Contour of Base of Orange Marker Band	
23-C-007-W1	Land Withdrawal Area Location of Facilities	
23-C-011-W1	Salt Pile Infiltration Controls New Design	
24-C-022-W	WIPP Site Facility Masterplan	
24-C-028-W1	WIPP Site Finish Grading and Paving	
24-C-028-W2	Site Work Finish Grading and Paving Sections and Details	
24-C-066-W1	Sanitary Sewage Lagoon Liner Replacement Project Site Plan & Details	
41-B-010-W1	CH Area Constant Volume CH Area HVAC Flow Diagram Supply Air	
41-M-001-W	Waste Handling Facilities TRUPACT Dock Equipment Arrangement	
41-S-003-W1	Waste Handling Bldg 411 Fire Protection Sprinkler System P & ID	
41-S-003-W2	Waste Handling Bldg 411 Fire Protection Sprinkler System P & ID	
41-S-003-W3	Waste Handling Bldg 411 Fire Protection Sprinkler System P & ID	
41-S-003-W4	Waste Handling Bldg 411 Fire Protection Sprinkler System P & ID	
53-J-039-W	Underground Utilities Fire Panel 534-FP-0320	
53-J-042-W	Underground Utilities Fire Panel 534-FP-00601	
54-W-009-W	Underground Mine Plan Shaft and Drift Dimensions	

APPENDIX G1-B DRAWINGS WIPP PANEL CLOSURE DESIGN DESCRIPTION AND SPECIFICATIONS

262-001	WIPP Panel Closure (WPC) Title Sheet
262-002	WPC Locations
262-003	Typical Panel Layout and Mined Entry Cross-Sections
262-004	WPC Details – Bulkhead and ROM Salt Locations
262-005	WPC Details – Bulkhead Front-View and Attachment Detail

APPENDIX G2-E DESIGN DRAWINGS SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

Design Drawings

Shaft Location Plan, Abbreviations, General Notes and Legend

Near-Surface/Rustler Formations Waste Shaft Stratigraphy and AS-Built Elements

Salado Formation Waste Shaft Stratigraphy and AS-Built Elements

Near-Surface/Rustler Formations Waste Shaft Stratigraphy and Sealing Subsystem Profile

Salado Formation Waste Shaft Stratigraphy and Sealing Subsystem Profile

Waste Shaft Station Monolith

Near-Surface / Rustler Formations Air Intake Shaft Stratigraphy and AS-Built Elements

Salado Formation Air Intake Shaft Stratigraphy and AS-Built Elements

Near-Surface / Rustler Formations Air Intake Shaft Stratigraphy and Sealing Subsystem Profile

Salado Formation Air Intake Shaft Stratigraphy and Sealing Subsystem Profile

Air Intake Shaft Station Monolith

Near-Surface / Rustler Formations Exhaust Shaft Stratigraphy and AS-Built Elements

Salado Formation Exhaust Shaft Stratigraphy and AS-Built Elements

Near-Surface / Rustler Formations Exhaust Shaft Stratigraphy and Sealing Subsystem Profile

Salado Formation Exhaust Shaft Stratigraphy and Sealing Subsystem Profile

Exhaust Shaft Station Monolith

Near-Surface / Rustler Formations Salt Handling Shaft Stratigraphy and AS-Built Elements

Salado Formation Salt Handling Shaft Stratigraphy and AS-Built Elements

Near-Surface / Rustler Formations Salt Handling Shaft Stratigraphy and Sealing Subsystem Profile

Salado Formation Salt Handling Shaft Stratigraphy and Sealing Subsystem Profile

Salt Handling Shaft Shaft Station Monolith

Concrete-Asphalt Water Stop in Salado Formation

Asphalt Column

Upper and Lower Salado Compacted Clay Columns

Compacted Salt Column

WIPP Shaft Sealing System Plug

Rustler Compacted Clay Column

Compacted Earthen Fill and Concrete Plug

Equipment and Construction Sketches

WIPP Shaft Sealing System Smaller Galloway General Arrangement Plans and Sections
WIPP Shaft Sealing System Larger Galloway General Arrangement Plans and Sections
WIPP Shaft Sealing System Typical Headframe Plans and Sections
WIPP Shaft Sealing System Typical Headframe and Associated Surface Facilities
WIPP Shaft Sealing Design System UC721 Distribution List

ABBREVIATIONS/ACRONYMS/UNITS OF MEASURE

ABBREVIATIONS AND ACRONYMS

	American Association of Otata Uishway and Transportation Officials
AASHTO	American Association of State Highway and Transportation Officials
ACI	American Concrete Institute
AIS	Air Intake Shaft
AISC	American Institute for Steel Construction
AK	acceptable knowledge
AKSD	Acceptable Knowledge Sufficiency Determination
ALARA	as low as reasonably achievable
AMM	asphaltic mastic mix
ANSI	American National Standards Institute
AOCs	Areas of Concern
AP	analysis plan
API	American Petroleum Institute
AR	Action Request
ARAs	additional requested analytes
ASTM	American Society for Testing and Materials
BDR	Batch Data Reports
Bell Canyon	Bell Canyon Formation
BGS	below ground surface
BLM	(U. S. Department of the Interior) Bureau of Land Management
BS/BSD	blank spike/blank spike duplicates
BWXT TSG	BWXT Technical Services Group, LLC
CAA	central accumulation areas
CA	controlled area
CAR	Corrective Action Report
Castile	Castile Formation
CBFO	
	Carlsbad Field Office
CDA	corrected during the audit
CFR	Code of Federal Regulations
СН	contact-handled
CIS	Characterization Information Summary
CMR	Central Monitoring Room
CMRO	Central Monitoring Room Operator
CMS	Central Monitoring System
CofC	chain-of-custody
CQC	contractor's quality control
CQCP	Contractor Quality Control Plan
Culebra	Culebra Member of the Rustler Formation
D&D	decontamination and decommissioning
DA	Data Administrator
DBE	
	design-basis earthquake
Determination Request	AK Sufficiency Determination Request
Dewey Lake	Dewey Lake Redbeds Formation
DI	deionized
DMP	Detection Monitoring Program
DMW	Detection Monitoring Well
DOE	U. S. Department of Energy
DOI	U. S. Department of the Interior

DOT DQO DRVMP DRZ DSA EAL EDD EMS EOC EPA ERT FEMA FSM GAR GAR GAR GAR GAR GAR GAR GAR GAR GAR	U. S. Department of Transportation data quality objective Disposal Room VOC Monitoring Program disturbed rock zone Documented Safety Analysis expanded average load electronic data deliverable Emergency Medical Servies Emergency Operations Center U. S. Environmental Protection Agency Emergency Response Team Federal Emergency Management Agency Facility Shift Manager Geotechnical Analysis Report Gatuña formation gas chromatography/mass spectrometry General Employee Training Geomechanical Instrumentation System Global Management and Operational Services Group Geomechanical Monitoring System Health and Safety Plant horizontal emplacement machine high efficiency particulate air (filter) health-based levels
HI	hazard index
HMAC	hot mix asphalt concrete
HVAC	heating, ventilation (and) air-conditioning (systems)
HWDU	Hazardous Waste Disposal Unit
HWMU	hazardous waste management unit
HWM	hazardous waste management
IC	instrument calibration
ICS	Incident Command System
ICV	inner containment vessel
ID	identification numbers
IVS	Interim Ventilation System
IUR	inhalation unit risk
JHA	Job Hazard Analysis
Kr	Krypton
LCS	laboratory control samples
LCSD	lab control sample duplicate
LDR	Land Disposal Restrictions
Los Medaños	Los Medaños Member of the Rustler Formation
LPUs LWA LWA M&DC Magenta	local processing units Land Withdrawal Act Land Withdrawal Boundary monitoring and data collection Magenta Member of the Rustler Formation Marker Bed 117
MB117 MB139	Marker Bed 139

M-D MDCF MDL	Munson-Dawson (creep model) multimechanism deformation coupled fracture method detection limit
MgO	magnesium oxide
MOC MPE	Management and Operating Contractor Modified Procter Energy
MRL	method reporting limits
MRT	Mine Rescue Team
MSHA	Mine Safety and Health Administration
N/A	Not Applicable
NCR	nonconformance report
NDE	non-destructive examination
NFB	New Filter Building
NFPA	National Fire Protection Association
NIMS NIST	National Incident Management System
NMAC	National Institute of Standards and Technology New Mexico Administrative Code
NMIMT	New Mexico Administrative Code New Mexico Institute of Mining and Technology
NMED	New Mexico Environment Department
NRC	U. S. Nuclear Regulatory Commission
NTS	not to scale
NWP	Nuclear Waste Partnership, LLC
OCA	outer confinement assembly
OCV	outer confinement vessel
OJT	on-the-job training
OSHA	Occupational Safety and Health Administration
PA	public address
PA	performance assessment
PABCs	Performance Assessment Baseline Calculations
PASK PAU	passive air sample-kit
PCB	Parking Area Unit polychlorinated biphenyl
PCS	panel closure system
Permit	WIPP Hazardous Waste Facility Permit
PM	preventive maintenance
PMP	probable maximum precipitation
PMR	Permit Modification Request
PMS	permanent marker system
PPA	Property Protection Area
PPE	personal protective equipment
PT	proficiency testing
PTM	Plug Test Matrix
QA	quality assurance
QAO	quality assurance objectives
QAPD	Quality Assurance Program Description
QAPjP	Quality Assurance Project Plan
QC R&D	quality control Research and Development
RCRA	Resource Conservation and Recovery Act
	Resource Conservation and Recovery Act

RFA RfC RH RIDS ROM ROMPCS RPD RSL Rustler RVMP RWP SAA Salado Santa Rosa SAP SAT SC SCBA SDI SDS SH SI SI SI SI SI SDS SH SI SI SI SDS SH SI SSSPT SVOC SVS SWB SWMUS SWP TC TCLP TDOP TDS TC	request for analysis reference concentration remote-handled records inventory and disposition schedule run-of-mine run-of-mine panel closure system relative percent difference EPA Regional Screening Level Rustler Formation Repository VOC Monitoring Program radiological work permit satellite accumulation areas Salado Formation Santa Rosa Formation Sampling and Analysis Plan Systematic Approach to Training specific conductance self-contained breathing apparatus Safety Data Sheet Salt Disposal Investigations Safety Data Sheet Salt Handling System International d'Unites generator/storage site(s) standard large box 2 Salado Mass Concrete standard operating procedure Site Project Manager Salt Reduction Building Small-Scale Seal Performance Tests semi-volatile organic compound Supplemental Ventilation System standard waste box Solid Waste Management Units Safe Work Permit toxicity characteristic toxicity characteristic toxicity characteristic leaching procedure ten-drum overpack total dissolved solids toantatively identified compound
	•
TOC	total organic carbon
TP	Test Plan
TRU	transuranic
TRUDOCK	TRUPACT-II unloading dock
TRUPACT-II	Transuranic Package Transporter-II
TRUPACT-III	Transuranic Package Transporter-III
TSDF	treatment, storage, and disposal facility
UPS	uninterruptible power supply
USGS	United States Geological Survey

UTLV UVFS VE VHS VOC	upper tolerance limit value Underground Ventilation Filter System visual examination vent hood system volatile organic compound
WAC	waste acceptance criteria
WAP	waste analysis plan
WGES	Westinghouse Government Environmental Services Company LLC
WGI	Washington Group International
WHB	Waste Handling Building
WHB Unit	Waste Handling Building Storage Unit
WID	Waste Isolation Division
WIPP	Waste Isolation Pilot Plant
WLMP	WIPP Groundwater Level Monitoring Program
WPC	WIPP Panel Closure
WQSP	Water Quality Sampling Program
WSPF	Waste Stream Profile Form
WTS	Washington TRU Solutions LLC
WTWBIR	WIPP Transuranic Waste Baseline Inventory Report
WWIS	WIPP Waste Information System
YTV	Yard Transfer Vehicle

UNITS OF MEASURE

%C	percent complete	
%R	percent recovery	
°C	degrees Celsius	
AC	alternating current	
acfm	actual cubic feet per minute	
cm	centimeter(s)	
cm ³	cubic centimeter(s)	
ft	foot (feet)	
ft ²	square foot (feet)	
ft ³	cubic foot (feet)	
	. ,	
g	gram(s)	
gal	gallon(s)	
ĥr	hour(s)	
in	inch(es)	
in ²	. ,	
-	square inch(es)	
kg	kilogram(s)	
km	kilometer(s)	
km²	square kilometer(s)	
kPa	kilopascal(s)	
	,	
kph	kilometer(s) per hour	
L	liter(s)	
lb	pound(s)	
m	meter(s)	
m ²	square meter(s)	
m ³		
	cubic meter(s)	
mg	milligram(s)	
mi	mile(s)	
mi ²	square miles	
mL	milliliter(s)	
mm	millimeter(s)	
mm Hg	millimeter of Mercury	
molal	moles per kilogram	
MPa	MegaPascal(s)	
mph	mile(s) per hour	
msl	mean sea level	
ppbv	part(s) per billion by volume	
ppm	part(s) per million	
ppmv	part(s) per million by volume	
psi	pound(s) per square inch	
psig	pound(s) per square inch gauge	
RPD	relative percent difference	
S	second(s)	
scfm	standard cubic foot (feet) per minute	
V	volt(s)	
wt%	weight percent	
yr	year(s)	
μg	microgram(s)	

µin	microinch(es)	
μm	micrometer(s)	

INTRODUCTION

INTRODUCTION

1

The Waste Isolation Pilot Plant (WIPP) facility is designed, constructed, and operated for the 2 management, storage and disposal of transuranic (TRU) mixed waste. Both contact-handled 3 (CH) and remote-handled (RH) TRU mixed wastes are permitted for storage and disposal at the 4 WIPP facility. The WIPP facility consists of a 16-section Federal land area under the jurisdiction 5 of the US Department of Energy (DOE). The WIPP facility includes a mined geologic repository, 6 defined as a "miscellaneous unit" under 20.4.1.100 New Mexico Administrative Code (NMAC), 7 incorporating Title 40 of the Code of Federal Regulations (CFR) §260.10: Miscellaneous unit 8 means a hazardous waste management unit where hazardous waste is treated, stored, or 9 disposed of and that is not a container, tank, surface impoundment, pile, land treatment unit, 10 landfill, incinerator, boiler, industrial furnace, underground injection well with appropriate 11 technical standards under part 146 of this chapter, containment building, corrective action 12 management unit, unit eligible for research, development, and demonstration permit under 40 13 CFR 270.65 or staging pile. The TRU mixed waste disposed of at the WIPP facility contains 14 hazardous waste constituents as co-contaminants with TRU radionuclides. The geologic 15 repository has been divided into discrete hazardous waste disposal units (HWDUs), known as 16 "panels," which have been permitted under 20.4.1.500 NMAC, incorporating 40 CFR Part 264, 17 Subpart X. In addition, two Hazardous Waste Management Units (HWMUs) have been 18 permitted under 20.4.1.500 NMAC, incorporating 40 CFR Part 264, Subpart I, as container 19 storage units. The first container storage unit is located inside the Waste Handling Building 20 (WHB) and consists of the CH bay, waste shaft conveyance loading room, waste shaft 21 conveyance entry room, RH bay, cask unloading room, hot cell, transfer cell, and facility cask 22 loading room. The second container storage unit is the Parking Area Unit, located outside the 23 24 WHB.

- This Renewal Application is submitted to address the requirements of the NMAC, Title 20, Chapter 4, Part 1, *Hazardous Waste Management*, specific to the TRU mixed waste operations of the WIPP facility. The WIPP facility currently has two permitted HWMUs and eight permitted HWDUs. The expiration date of the WIPP Hazardous Waste Facility Permit (**Permit**) is December 30, 2020.
- Pursuant to the New Mexico Hazardous Waste Regulations and Permit Part 1, Section 1.7.3,
 Duty to Reapply:
- If the Permittees wish to continue an activity regulated by this Permit after the
 expiration date of this Permit, the Permittees shall apply for and obtain a new
 Permit. The Permittees shall submit an application for a new Permit at least 180
 calendar days before the expiration date of this Permit. [20.4.1.900 NMAC
 (incorporating 40 CFR §§270.10(h), 270.30(b))]
- Part A of the Renewal Application includes the information required by 20.4.1.900 NMAC,
 incorporating 40 CFR §270.13, *Contents of Part A of the permit application*. Additionally, Part B
 of the Renewal Application includes general WIPP facility information required by 20.4.1.900
 NMAC, incorporating 40 CFR §270.14, *Contents of Part B: General Requirements*, as well as
 WIPP-facility specific information required by 20.4.1.900 NMAC, incorporating 40 CFR §270.15,
 Specific Part B information requirements for containers, and 40 CFR §270.23, *Specific Part B information requirements for miscellaneous units*.

In this Renewal Application, the Permittees are seeking the following changes or are providing
 new/revised information:

Updated information in the form of revised drawings, photos, and demographic 3 • information in the Part A and Part B applications; site geological and hydrological 4 information in Attachment L and Addendum L1; and the miscellaneous unit performance 5 demonstration in Addendum N1 6 Updated and consolidated figures in Permit Attachments A1, A2, A3, G, H1, L, and N 7 into Attachment M, Figures 8 Changes to reference DOE radiological guidance and regulations in Attachments A1, D, 9 G, G3, H, and H1 10 Revised Permit reporting requirements in Attachments C3, L, and N and removal of the • 11 requirement for the guarterly repeat of the data-generation level review in Attachment C3 12 Revised inspection schedules in Attachment E • 13 Minor revisions to groundwater monitoring procedures in Attachment L 14 • Editorial and formatting corrections to Permit text • 15 Simplifying and streamlining Permit text to remove redundancy and inconsistencies, 16 • thereby enhancing its readability. 17 Clarification of Permit text to improve its comprehensibility, thereby enhancing its 18 • readability 19 Removal of obsolete information that is no longer applicable to the hazardous waste • 20 management activities for which a renewed Permit is being sought 21 • Removal of unnecessary detail that does not support a Permit requirement or is not 22 required by the New Mexico Hazardous Waste Regulations 23 The following are **not** included in the Renewal Application: 24 Portions of the original Part B Permit Application and 2009 Amended Renewal 25 • Application that were incorporated into the Permit by reference 26 Permit parts (these are considered Permit conditions; to be established by the New • 27 Mexico Environment Department (NMED) in accordance with 20.4.1.900 NMAC, 28 incorporating 40 CFR §270.32) 29 Pending and future permit modification notifications or requests; approved modifications • 30 will be incorporated into the draft and final permits by the NMED 31

Five addenda to the attachments are included in the Renewal Application to provide significant information pertaining to topic(s) contained in the associated attachments. The addenda and the reasons for including them are as follows:

Addendum C1, *Dispute Resolution* (This is a provision that is contained in Part 1, 4 Section 1.16 of the Permit that the Permittees wish to retain in the renewed Permit) 5 Addendum D1, Preparedness and Prevention (This is specifically required by the 6 • regulations at 20.4.1.900 NMAC, incorporating 40 CFR §§270.14(b)(8) and 270.14(b)(9)) 7 Addendum E1, Security (This is specifically required by the regulations at 20.4.1.900) 8 NMAC, incorporating 40 CFR §270.14(b)(4)) 9 Addendum G1, Need for Additional Panels for the Ten-Year Hazardous Waste Facility 10 Permit Renewal (This is included to accompany the revised closure schedule in Renewal 11 Application Attachment G; the addendum discusses the need for additional panels 12 during the ten-year term of the renewed Permit to compensate for the disposal capacity 13 that has been lost since the beginning of the Disposal Phase). 14 Addendum L1, Site Characterization (This is specifically required by the regulations at • 15 20.4.1.900 NMAC, incorporating 40 CFR §§270.14(c)(2), 270.14(c)(6), 270.23(b), and 16 270.23(c)). 17 Addendum N1, 300-year Performance Demonstration Re-Evaluation (This is specifically 18 • required by 20.4.1.900 NMAC, incorporating 40 CFR §§270.23(a), 270.23(b), and 19 270.23(c), and updates information that was used to prepare the original Part B Permit 20 Application. The original analysis and the updated information reach the same 21 conclusion that the only significant pathway for the release of hazardous waste or 22 hazardous waste constituents from the miscellaneous unit is the air pathway involving 23 the release of volatile organic compounds from containers prior to final facility closure.) 24

Additionally, for the Part B Application attachments, the Permittees are representing proposed changed text from the current Permit attachments in redline/strike out format. For those individuals who wish to print the document and do not have a color printer, proposed replacement text is also <u>double underlined</u> so that proposed text can be readily identified. For

example, the resulting text appears as: <u>new proposed text</u>.

The version of the Permit used to create the Renewal Application is the latest version the NMED has posted on its web page, dated February 2020. **REGULATORY REQUIREMENTS CROSSWALK**

1

REGULATORY REQUIREMENTS CROSSWALK

- 2 This crosswalk is intended to assist the reviewer in locating relevant information in the Renewal
- 3 Application. To see the regulatory language and more information about how compliance is
- 4 documented in the Renewal Application, see the information under *Information Required by 40*
- 5 CFR Part 270, §270.13, Contents of Part A of the Permit Application and Information Required
- 6 for the WIPP Facility Ten-Year Renewal Application, Part B.

Regulatory Requirements Crosswalk

1

Permit or 20.4.1.900 NMAC Regulatory Requirement	Description of Requirement	Location in the Renewal Application	Explanation Why Requirement is Not Applicable (N/A)
Permit Part 1, Section 1.3.2	The Permittees may renew the Permit by submitting an application at least 180 calendar days before the expiration date of the Permit	The Permittees are submitting this renewal application at least 180 days before the expiration of the existing permit.	
Permit Part 1, Section 1.3.2	In reviewing the application, the Secretary shall consider improvements in the state of control and measurement technology and changes in applicable regulations	N/A	There have been no changes in the state of control and measurement technology or changes in applicable regulations. Therefore, this requirement is not applicable.
§270.10(a)(1)	Applying for a permit if covered by RCRA permits by rule	N/A	The Permittees are not seeking a permit by rule. Therefore, this requirement is not applicable.
§270.10(a)(2)	Applying for a permit if currently have interim status	N/A	The Permittees do not currently have interim status. Therefore, this requirement is not applicable.
§270.10(a)(3)	If required to have a permit, must complete, sign, and submit application	Entire Renewal Application	
§270.10(a)(4)	Applying for a permit if seeking an emergency permit	N/A	The Permittees are not seeking an emergency permit. Therefore, this requirement is not applicable.
§270.10(a)(5)	Applying for a permit if seeking a research, development, and demonstration permit	N/A	The Permittees are not seeking a research, development, and demonstration permit. Therefore, this requirement is not applicable.
§270.10(a)(6)	Applying for a permit if seeking a standardized permit	N/A	The Permittees are not seeking a standardized permit. Therefore, this requirement is not applicable.
§270.10(b)	Operator must obtain a permit; owner must also sign permit application	Part A Application	

Permit or 20.4.1.900 NMAC Regulatory Requirement	Description of Requirement	Location in the Renewal Application	Explanation Why Requirement is Not Applicable (N/A)
§270.10(c)	Director shall not issue a permit before receiving a complete application	Entire Renewal Application	
§270.10(d)	Applicants must submit information set forth in §270.13 and applicable sections in §§270.14 through 270.29	Entire Renewal Application	
§270.10(e)	Existing hazardous waste management facilities and interim status qualifications	N/A	The WIPP facility is not an existing facility under this section. Therefore, this requirement is not applicable.
§270.10(f)	New hazardous waste management facilities	N/A	The WIPP facility is not a new facility under this section. Therefore, this requirement is not applicable.
§270.10(g)	Updating permit applications	N/A	The Permittees are not seeking to update a permit application. Therefore, this requirement is not applicable.
§270.10(h)(1)	Reapplying for a permit, if applicant has an existing permit and wants to apply for a new one	The Permittees are submitting this renewal application at least 180 days before the expiration of the existing permit.	
§270.10(i)	Applicants shall keep records of all data use to complete permit applications and any supplemental information	The Permittees maintain the records of this application on file at the facility.	
§270.10(j)	Exposure information for surface impoundment or landfill	N/A	The WIPP facility is not a surface impoundment or landfill. Therefore, this requirement is not applicable.
§270.10(k)	Permittee may be required to submit information to Director in order to establish permit conditions	N/A	The Secretary has not requested any additional information in order to establish permit conditions.

Permit or 20.4.1.900 NMAC Regulatory Requirement	Description of Requirement	Location in the Renewal Application	Explanation Why Requirement is Not Applicable (N/A)
§270.10(I)	Requirements when Director determines that compliance with 40 CFR part 63, subpart EEE alone may not be protective of human health or the environment	N/A	The WIPP facility does not have emissions regulated under 40 CFR Part 63, Subpart EEE. Therefore, this requirement is not applicable.
§270.13	Revised Part A application	Part A Application	
§270.14(b)(1)	General facility description	Attachments A and A1-A3	
§270.14(b)(2)	Chemical and physical analyses of waste	Attachments C and C1-C7	
§270.14(b)(3)	Waste analysis plan	Attachments C and C1-C7	
§270.14(b)(4)	Security procedures and equipment	Attachment E and Addendum E1	
§270.14(b)(5)	Inspection schedule	Attachment E	
§270.14(b)(6)	Preparedness & prevention waiver	N/A	The Permittees are not requesting a preparedness and prevention waiver.
§270.14(b)(7)	Contingency plan	Attachment D	
§270.14(b)(8)(i)	Prevent hazards in unloading operations	Addendum D1	
§270.14(b)(8)(ii)	Prevent runoff from hazardous waste handling areas	Addendum D1	
§270.14(b)(8)(iii)	Prevent contamination of water supplies	Addendum D1	
§270.14(b)(8)(iv)	Mitigate effects of equipment failure and power outages	Addendum D1	
§270.14(b)(8)(v)	Prevent undue exposure of personnel to hazardous waste	Addendum D1	
§270.14(b)(8)(vi)	Prevent releases to atmosphere	Addendum D1	

Permit or 20.4.1.900 NMAC Regulatory Requirement	Description of Requirement	Location in the Renewal Application	Explanation Why Requirement is Not Applicable (N/A)
§270.14(b)(9)	Description of precautions to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes	Addendum D1	
§270.14(b)(10)	Traffic patterns, estimated volume, and control	Attachment A3	
§270.14(b)(11)(i)	Facility location information	Attachment A	
§270.14(b)(11)(ii)	Seismic standard requirements	N/A	The requirement asks the applicant to determine the applicability of the seismic standard based on the location of the facility. For the applicant to determine the applicability of this requirement, they must refer to Appendix VI of Part 264, <i>Political Jurisdictions in</i> <i>Which Compliance With §264.18(a) Must Be Demonstrated</i> . The Waste Isolation Pilot Plant facility is located in Eddy County, New Mexico. Eddy County, New Mexico, is not listed in Part 264, Appendix VI. No further information is required to demonstrate compliance with §264.18(a), Location Standards.
§270.14(b)(11)(ii) (A)	No fault within 3,000 feet (ft) with displacement in Holocene time	N/A	As the WIPP facility is not listed in a political jurisdiction in which compliance with §264.18(a) must be demonstrated, this requirement is not applicable.
§270.14(b)(11)(ii) (B)	If faults that have displacement in Holocene time are present within 3,000 ft, no faults pass within 200 ft of portions of the facility	N/A	As the WIPP facility is not listed in a political jurisdiction in which compliance with §264.18(a) must be demonstrated, this requirement is not applicable.
§270.14(b)(11)(iii),(iv)	100-year floodplain standard	N/A	As the WIPP facility is not in a 100-year floodplain, this requirement is not applicable.
§270.14(b)(11)(v)	Compliance with §264.18(b)	N/A	As the WIPP facility is not in a 100-year floodplain, this requirement is not applicable.
§270.14(b)(12)	Personnel training program	Attachment F	
§270.14(b)(13)	Closure and post-closure plans	Attachments G and G1-G2; Addendum G1; Attachments H and H1	
§270.14(b)(14)	Documentation of closed units (§264.119)	N/A	As the WIPP facility has no closed units, this requirement is not applicable.

Permit or 20.4.1.900 NMAC Regulatory Requirement	Description of Requirement	Location in the Renewal Application	Explanation Why Requirement is Not Applicable (N/A)
§270.14(b)(15)	Closure cost estimate (§264.142);and documentation (§264.143)	N/A	Pursuant to 40 CFR §264.140(c), the Federal government is exempt from 40 CFR Part 264 Subpart H, <i>Financial Requirements</i> . Therefore, this provision is not applicable.
§270.14(b)(16)	Post closure cost estimate (§264.144); and documentation (§264.145)	N/A	Pursuant to 40 CFR §264.140(c), the Federal government is exempt from 40 CFR Part 264 Subpart H, <i>Financial Requirements</i> . Therefore, this provision is not applicable.
§270.14(b)(17)	Documentation of insurance (§264.147)	N/A	Pursuant to 40 CFR §264.140(c), the Federal government is exempt from 40 CFR Part 264 Subpart H, <i>Financial Requirements</i> . Therefore, this provision is not applicable.
§270.14(b)(18)	Proof of financial coverage (§§264.149-150)	N/A	Pursuant to 40 CFR §264.140(c), the Federal government is exempt from 40 CFR Part 264 Subpart H, <i>Financial Requirements</i> . Therefore, this provision is not applicable.
§270.14(b)(19)	Topographic map requirements	Part A Application, Figure 2-3	
§270.14(b)(19)(i)	Map scale and date	Part A Application, Figure 2-3	
§270.14(b)(19)(ii)	100-year floodplain area	N/A	As the WIPP facility is not in a 100-year floodplain, this requirement is not applicable.
§270.14(b)(19)(iii)	Surface waters	Part A Application, Figure 2-3	
§270.14(b)(19)(iv)	Surrounding land uses	Part B Application, Maps and Illustrations	
§270.14(b)(19)(v)	Wind rose	Part B Application, Maps and Illustrations	
§270.14(b)(19)(vi)	Map orientation	Part A Application, Figure 2-3	
§270.14(b)(19)(vii)	Legal boundaries	Part A Application, Figure 2-3	
§270.14(b)(19)(viii)	Access control	Part B Application, Maps and Illustrations	
§270.14(b)(19)(ix)	Injection and withdrawal wells	Part A Application, Figure 2-3	
§270.14(b)(19)(x)	Buildings and structures	Part B Application, Maps and Illustrations	
§270.14(b)(19)(xi)	Barriers for drainage and flood control	Part B Application, Maps and Illustrations	
§270.14(b)(19)(xii)	Location of operational units	Part B Application, Maps and Illustrations	

Permit or 20.4.1.900 NMAC Regulatory Requirement	Description of Requirement	Location in the Renewal Application	Explanation Why Requirement is Not Applicable (N/A)
§270.14(b)(20)	Additional information required by regulator	N/A	The Permittees will submit information necessary to enable the Secretary to carry out his duties under other Federal laws as required in 40 CFR §270.3, as requested. Until an information request is made by the Secretary, this requirement is not applicable to this application.
§270.14(b)(21)	Extension or petition for land disposal facilities	N/A	The WIPP Land Withdrawal Act Amendment of 1996 exempts waste designated by the Secretary of Energy for disposal at the WIPP facility from the Land Disposal Restrictions of 40 CFR Part 268. Therefore, this requirement is not applicable.
§270.14(b)(22)	Summary of the pre- application meeting	Part B Application, Public Participation Information	
§270.14(c)(1)	Summary of groundwater monitoring data obtained during interim status	N/A	The Permittees have not collected groundwater data under interim status.
§270.14(c)(2)	Identification of the uppermost aquifer	Attachment L and Addendum L1	
§270.14(c)(3)	Delineation of waste management area, property boundary, point of compliance, and groundwater monitoring wells	Part A Application, Figure 2-3, Part B Application, Maps and Illustrations	
§270.14(c)(4)	Description of any plume of contamination	N/A	No plume of contamination has entered the groundwater from a regulated unit.
§270.14(c)(5)	Describe proposed groundwater monitoring program to meet requirements of 40 CFR §264.97	N/A	No contamination has entered the groundwater from a regulated unit.
§270.14(c)(6)	Describe proposed detection monitoring program to meet requirements of 40 CFR §264.98	Attachment L and Addendum L1	
§270.14(c)(7)	Information relative to contamination	N/A	No contamination has entered the groundwater from a regulated unit.

Permit or 20.4.1.900 NMAC Regulatory Requirement	Description of Requirement	Location in the Renewal Application	Explanation Why Requirement is Not Applicable (N/A)
§270.14(c)(8)	Information relative to contamination in excess of limits	N/A	No contamination has entered the groundwater from a regulated unit.
§270.14(d)	Information on SWMUs	N/A	The NMED determined that no further action is necessary to investigate fifteen Solid Waste Management Units (SWMUs) and eight Areas of Concern (AOCs) at the WIPP facility. A Class 3 permit modification request to remove SWMUs and AOCs from their Permit was approved by the NMED on October 23, 2008. No new SWMUs or AOCs have been identified for inclusion in the Renewal Application.
§270.15(a)	Description of containment system	Part B Application, Maps and Illustrations, Attachment A1	
§270.15(b)	For storage areas that store containers holding waste that does not contain free liquids, a demonstration of compliance with 40 CFR §264.175(c)	N/A	The DOE manages TRU mixed waste containers in the Parking Area and the Waste Handling Building as though they contain up to one percent residual liquids. Appropriate secondary containment calculations are provided in Attachment A1 of the Renewal Application. Consequently, the requirements in 20 4.1.500 NMAC, incorporating 40 CFR §264.175(c) do not apply to the WIPP facility.
§270.15(c)	Location of ignitable, reactive, and incompatible waste in compliance with 40 CFR §264.176 and §264.177(c)	N/A	Waste received at the WIPP facility will be determined to be compatible prior to being received at the WIPP. Ignitable, reactive, or corrosive waste (i.e., compressed gases and liquids in excess of the TSDF-WAC) are prohibited in accordance with the TSDF-WAC. Therefore, a buffer zone for containers holding ignitable or reactive wastes and incompatible wastes is not needed.
§270.15(d)	Description of procedures to ensure compliance with 40 CFR §§264.177(a) and (b), and §§264.17(b) and (c) for incompatible waste	Attachments C and D	
§270.15(e)	Information on air emission control equipment as required in §270.27	N/A	Pursuant to 40 CFR §264.1080(a)(6), air emission controls for containers do not apply to radioactive mixed waste. Therefore, this requirement is not applicable.
§270.23(a)	Detailed description of the unit	Attachment A2, Attachment N, Addendum N1, Part B Application, Maps and Illustrations	

Permit or 20.4.1.900 NMAC Regulatory Requirement	Description of Requirement	Location in the Renewal Application	Explanation Why Requirement is Not Applicable (N/A)
§270.23(b)	Detailed hydrologic, geologic, and meteorologic assessments in land use map for regions surrounding the site	Addendum L1, Attachment A2, Addendum N1	
§270.23(c)	Information on the potential pathways of exposure	Part B Application: Information Required for the WIPP Facility Ten-Year Renewal Application, Part B, Addendum L1, Attachment A2, Attachment N, Addendum N1	
§270.23(d)	Demonstration of treatment effectiveness	N/A	The WIPP facility does not operate treatment units.
§270.23(e)	Any additional information determined by the director	Any additional information determined by the Secretary to be necessary for evaluation of compliance of the unit with the environmental performance standards of §264.601 will be provided as requested.	

1

Summary of Proposed Changes

Summary of Proposed Changes*

The following table provides a broad summary of the proposed changes to the current Permit text that are reflected in Ten-Year Hazardous Waste Facility Permit Renewal Application:

Renewal Application Section	Description of Change(s)	Discussion		
	Global Changes (Specific Changes are Addressed in Attachment Subheadings)			
	Clarify Renewal Application text.	Clarifying Renewal Application (i.e., Permit attachment) text does not mean removing requirements; it means revising (or adding to) the text so that the description is less confusing and more comprehensible, thereby enhancing the readability of the Renewal Application and ensuring accurate and consistent implementation of the requirements.		
	Streamline Renewal Application text; remove redundancy.	Streamlining Renewal Application (i.e., Permit attachment) text means consolidating descriptions that are similar in content for the purposes of making the text more effective and efficient. Removing redundancy means deleting sections of text that are duplicative, thereby enhancing the readability of the Renewal Application. These changes reduce the administrative burden associated with maintaining the Permit and ensure accurate and consistent implementation of the requirements.		
General	Provide updated or additional information.	Updated or additional information has been provided in the Renewal Application (i.e., Permit attachments), as appropriate, in order to ensure the completeness of the Renewal Application.		
	Remove obsolete information.	Obsolete information has been removed from the Renewal Application (i.e., Permit attachments) in isolated instances where the information is no longer applicable to the hazardous waste management activities for which a renewed Permit is being sought.		
	Revise text to correct specific details regarding supporting information described in Renewal Application attachments.	These changes provide necessary corrections to Permit text, thereby ensuring the accuracy of the Renewal Application.		
	Remove unnecessary detail that does not support a Permit requirement or is not required by the New Mexico Hazardous Waste Regulations.	The removal of unnecessary detail within the Renewal Application (i.e., Permit attachments) occurs in isolated areas. These changes are described, along with the respective reasons for the changes, under the attachment subheadings of this table.		

Renewal Application Section	Description of Change(s)	Discussion
	Global Editorial Cl	hanges
Attachments A1, A2, A3, G, H1, L, and N	Consolidated figures into Attachment M, <i>Figures</i> ; changed figure references to the corresponding figure number in Attachment M.	Ensure consistency with other hazardous waste facility permits in New Mexico.
	Made editorial corrections in accordance with the Government Printing Office style manual.	Corrections ensure the Renewal Application is grammatically and stylistically accurate, thereby enhancing its readability.
	Added line numbers, as needed.	Facilitate review of the Renewal Application.
	Changed page-numbering format to plain number (e.g., "PERMIT ATTACHMENT A, Page A-1 of 7" changed to "1"); these changes are not tracked.	Ensure consistency with other hazardous waste facility permits in New Mexico.
	Updated Tables of Content to reflect revised page numbering format and any changes to the section numbers/titles; these changes are not tracked.	Ensure accuracy and enhance the readability of the Renewal Application.
	Removed "(This page intentionally left blank)" pages.	Improve the efficiency of the Renewal Application text by removing unnecessary pages, which are not needed for electronic documents, thereby enhancing readability.
	Called out acronyms in each Renewal Application section at first use; acronyms do not begin sentences.	Ensure accuracy and enhance the readability of the Renewal Application.
General	Regulatory citations edited and clarified, as needed; sentences do not begin with regulatory citations (i.e., they are preceded with "The regulations at").	Ensure accuracy and enhance the readability of the Renewal Application.
	Revised text to ensure the acronym "WIPP" is not used as a noun but as an adjective to "facility," "site," "Project," etc.	Ensure accuracy and enhance the readability of the Renewal Application.
	References to Permit parts, and sections within parts, clarified to indicate the Permit part, section number, and section title, as appropriate (e.g., Permit Part 3, Section 3.3, <i>Condition of Containers</i>).	Ensure accuracy and enhance the readability of the Renewal Application.
	For Permit part section references, deleted "." after section number, as needed.	Ensure accuracy and enhance the readability of the Renewal Application.
	References to Permit attachments, and sections within attachments, have been clarified to indicate the Permit attachment and section number within the attachment (e.g., Permit Attachment A1, Section A1-1).	Ensure accuracy and enhance the readability of the Renewal Application.
	Where appropriate, changed verb tense from future tense to present tense.	Ensure accuracy and enhance the readability of the Renewal Application.
	Removed all-inclusive words such as "all," "every,"	Ensure accuracy and enhance the readability of the Renewal

Renewal Application Section	Description of Change(s)	Discussion
	"each," as appropriate.	Application.
	Changed "Contact Handled Packages" and "Remote Handled Packages" to "CH packages" and "RH packages," respectively.	Ensure accuracy and enhance the readability of the Renewal Application.
	Capitalized "Operating Record."	Ensure accuracy and enhance the readability of the Renewal Application.
	Where applicable, changed references to "the DOE" to "the Permittees."	Ensure accuracy and enhance the readability of the Renewal Application.
	Provided both the NMAC and CFR citations, as appropriate.	Ensure accuracy and enhance the readability of the Renewal Application.
	Changed "TRU waste" to "TRU mixed waste," as appropriate.	Ensure accuracy and enhance the readability of the Renewal Application.
	Added references to the WIPP Hazardous Waste Facility Permit Renewal Application (DOE, 2020), where needed.	Ensure accuracy and enhance the readability of the Renewal Application.
	Changed "on line" to "online."	Ensure accuracy and enhance the readability of the Renewal Application.
	Changed references to "Parking Area Container Storage Unit" to "PAU," once the acronym has been defined in the section.	Ensure accuracy and enhance the readability of the Renewal Application.
	Lowercased "underground."	Ensure accuracy and enhance the readability of the Renewal Application.
	Part A Application (Permit	Attachment B)
General	Provided updated information, as required by NMAC 20.4.1.900 (incorporating 40 CFR §270.13, <i>Contents of part A of the permit application.</i>	Ensure that the Renewal Application is complete, accurate, and current.
	Attachment	A
	General Facility Description and	Process Information
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
Section A-1 Facility Description	Added street address for the WIPP facility, "34 Louis Whitlock Road Carlsbad, New Mexico 88220." Modified the WIPP facility location to "26 miles east of Carlsbad in Eddy County."	Ensure the completeness and accuracy of the Renewal Application, and ensure consistency with other sections of the application (e.g., Part A, Attachment L).
	Corrected the coordinates for the geographic location of	Ensure the accuracy of the Renewal Application; 26 miles is the

Renewal Application Section	Description of Change(s)	Discussion
	the WIPP facility.	distance from Carlsbad based on the geographical coordinates.
Section A-3 Property Description	Changed the Land Withdrawal Area parenthetical to follow "16-section Federal land area" instead of "WIPP Site Boundary."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Added "Room 108" as an area of the WHB Unit.	Ensure the completeness and accuracy of the Renewal Application.
	Changed "rail siding" to "chain-link security fence."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Changed "up to 50 loaded Contact-Handled Packages" to "CH shipping containers referred to as CH packages," and changed "14 loaded Remote-Handled Packages" to "RH shipping containers referred to as RH packages."	Provide clarification, consistent with the Global comment described above, and remove detail relative to storage capacities in the PAU that are defined in Permit Part 3, Section 3.1.1, thereby streamlining the Renewal Application and enhancing its readability.
	Clarified that the WIPP facility underground structures are located in a mined salt bed "approximately" 2,150 feet below the surface.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section A-4 Facility Type	Relocated and revised text defining a "miscellaneous unit" and describing the permitting requirements applicable to hazardous waste management units within the repository.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Revised text to clarify that the Disposal Phase of the WIPP Project consists of receiving loaded CH and RH packages, unloading and transporting the waste containers to the underground HWDUs, emplacing the waste in the underground HWDUs, and subsequently achieving closure of the underground HWDUs.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Added a sentence referencing Permit Attachments G, G1, and G2 for the description of closure activities.	Ensure the completeness and accuracy of the Renewal Application.
	Removed "facilitate RCRA waste characterization."	Ensure the accuracy of the Renewal Application; assignment of a waste stream to a Waste Summary Category no longer facilitates waste characterization since each waste stream is characterized in the same manner.
Section A-5 Waste Description	Added reference to Permit Attachment C for details regarding the Summary Category Groups and removed the individual descriptions for Waste Summary Categories S3000, S4000, and S5000.	Remove redundancy with information that is provided in Permit Attachment C, <i>Waste Analysis Plan</i> , thereby streamlining the Renewal Application and enhancing its readability.
	Deleted paragraph that describes the use of the waste characterization process required for the category constituting the greatest volume of waste for a waste stream.	Remove outdated and obsolete information that is no longer pertinent to the <i>Waste Analysis Plan</i> since each waste stream undergoes the same waste characterization process, regardless of the summary category assignment.

Renewal Application Section	Description of Change(s)	Discussion
	Expanded the description of "derived waste" by clarifying that its hazardous waste characteristics are derived from the off-site waste that produced it.	Ensure the completeness and accuracy of the Renewal Application.
	Changed "permitted facility" to "designated facility."	Ensure the accuracy of the Renewal Application.
	Attachment A	1
	Container Stora	Ige
	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
	Figure references changed throughout to correspond with figure numbers in Attachment M, <i>Figures</i> .	Ensure the accuracy of the Renewal Application; figures in Attachment A1 have been consolidated into Attachment M, <i>Figures.</i>
	References to Permit Part 3, <i>Container Storage,</i> and applicable sections added as appropriate for clarity and streamlining of text.	Provide clarification, ensure accuracy, and enhance readability of the Renewal Application. These clarifications establish a greater correlation between the descriptive information in Permit Attachment A1 and the corresponding conditions in Permit Part 3.
	Included equivalent liter volumes for containers (e.g., 85-gal (322-L).	Ensure the completeness and accuracy of the Renewal Application.
General	Made changes to units to establish internal consistency; included both English and Metric units, as appropriate.	Ensure accuracy and enhance the readability of the Renewal Application.
	Removed references to standard drum pallets.	Remove redundancy, ensure accuracy, and enhance the readability of the Renewal Application. Containment pallets and drum pallets are the same; the correct term is "containment pallet."
	Ensured the following terms are uppercased: Payload Transfer Station Facility Transfer Vehicle Waste Shaft Conveyance Facility Cask Transfer Car Facility Cask Waste Shaft Station	Ensure accuracy and enhance the readability of the Renewal Application.
Introduction	Changed "buildings and systems" to "buildings, systems, and components."	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1b Description of Containers	Text revised to remove requirement that containers will be certified free of surface contamination upon shipment.	Remove unnecessary detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. This is a requirement of the WIPP Waste Acceptance Criteria and must be met by the shipper.
	Removed descriptive text pertaining to the verification of the absence of external contamination above DOE limits.	Remove redundancy, thereby streamlining the Renewal Application. The deleted text is not relevant to the description of containers. These activities are addressed in Section A1-1d, <i>Container Management</i>

Renewal Application Section	Description of Change(s)	Discussion
		Practices.
	Paragraph added to summarize descriptive container information applicable to each CH and RH TRU mixed waste container.	Remove redundancy within Sections A1-1b(1) and A1-1b(2), thereby streamlining the Renewal Application and enhancing its readability.
Section A1-1b(1) CH TRU Mixed Waste	Sentences added to summarize information applicable to each CH TRU mixed waste container; reference a summary description of each container type to a new Table A1-1; provide figure references for each container type; and reference Table A1-2 for gross weights of each container.	Remove redundancy within Section A1-1b(1), thereby streamlining the Renewal Application and enhancing its readability.
Containers	Removed summaries of each individual CH TRU mixed waste container.	Streamline the Renewal Application and enhance its readability. The CH TRU mixed waste container descriptive information has been consolidated into Sections A1-1b and A1-1b(1), as described above and summarized in the new Table A1-1, <i>TRU Mixed Waste Containers</i> .
Section A1-1b(2) RH TRU Mixed Waste Containers	Sentences added to summarize information applicable to each RH TRU mixed waste container; describe the shielding properties of the shielded container; reference a summary description of each container type to a new Table A1-1; provide figure references for each container; and reference Tables A1-2 and A1-3 for gross weights of each container.	Remove redundancy within Section A1-1b(1), thereby streamlining the Renewal Application and enhancing its readability.
	Removed summaries of each individual RH TRU mixed waste container.	Streamline the Renewal Application and enhance its readability. The RH TRU mixed waste container descriptive information has been consolidated into Sections A1-1b and A1-1b(2), as described above and summarized in the new Table A1-1, <i>TRU Mixed Waste Containers</i> .
Section A1-1c Description of the Container Storage Units	Throughout section, removed detail relative to specified load capacities of equipment; these capacities are listed in Tables A1-2 and A1-3, and references to these tables are already provided in the Attachment A1 text.	Remove redundancy within the Renewal Application and enhance readability.
Section A1 10(1)	Changed "These areas are being permitted as the WHB Unit" to "These areas comprise the WHB Unit."	Ensure accuracy and enhance the readability of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit	Modified text to indicate that the concrete floors in the WHB provide containment of leaks and spills of TRU mixed waste, but they are sealed with a coating that has been demonstrated to be compatible with the waste.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application. Secondary containment is provided by the concrete floors themselves, not the coating on the floors; however, the coating must be compatible with TRU mixed waste, which renders the coating impervious to any chemicals present in the waste.

Renewal Application Section	Description of Change(s)	Discussion
Section A1-1c(1) Waste Handling Building Container Storage Unit; CH Bay Surge Storage Area	Added text to clarify that the maximum capacity of the CH Bay Storage Area is specified in Permit Part 3, Table 3.1.1, WHB Unit. Added the following parenthetical prior to the bullet list outlining the conditions use of the CH Bay Surge Storage Area: "(as discussed in Section A1-1e(2), the PAU may not be full, but the shipping package has reached day 59 of its Nuclear Regulatory Commission (NRC) 60-day venting period limit, and the waste containers must be removed from the shipping package and placed into storage in the WHB Unit)."	Enhance the readability of the Renewal Application by establishing a stronger correlation between Attachment A1 and the Part 3 conditions, which allows further streamlining of text in subsequent sections. Ensure the accuracy and completeness of the Renewal Application by removing an apparent internal inconsistency within Attachment A1. In Section A1-1e(2), a bullet list outlines the reasons that TRU mixed waste containers may be retained in their shipping containers for an extended period of time. In the case of the third bullet, the CH or RH package may be at day 59 of its 60-day venting period; therefore, the package would have to be brought into the WHB for venting and unloading, and under this condition, the PAU may not be full but the CH Bay Storage Area may be at capacity due to an equipment malfunction preventing the timely movement of waste containers into the underground. Under these circumstances, the Permittees may need to implement CH Bay Surge Storage in order to have the capacity to store and begin inspecting the waste containers.
Section A1-1c(1) Waste Handing Building	Changed "The cranes are rated to lift the Contact Handled Packaging lids as well as their contents" to "The cranes are rated to lift the CH package lids and package contents." Removed text pertaining to the requirement for containers to be in good condition upon receipt as well as the characteristics of a container in good condition. Text modified to indicate that waste containers will be checked for external radiological surface contamination through the use of swipes and radiation monitoring equipment, consistent with radiological control	 Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application. Remove redundancy to streamline Renewal Application and enhance its readability; this information is provided in Section A1-1b. The radiation protection standards are governed by the DOE, pursuant to 10 CFR Part 835, <i>Occupation Radiation Protection.</i> No Permit conditions are being removed, and no changes are being proposed relative to decontamination practices associated with
Container Storage Unit; TRUPACT-II and HalfPACT Management	procedures pursuant to 10 CFR Part 835, and if local decontamination activities are opted for, the work will be conducted in the WHB Unit, consistent with radiological control procedures.	hazardous waste or hazardous waste constituents. The changes make reference to the governing DOE standards for radiological control procedures, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to the DOE standards, should those standards be revised.
	Text revised to state that once the waste is placed on containment pallets, the pallets are then "maintained in" (rather than "relocated to") the CH Bay Storage Area normal storage. Removed sentence, "The maximum TRU mixed waste	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application. Waste containers placed on facility pallets or containment pallets are already located in the CH Bay Storage Area; therefore, there is no need to "relocate" the waste for normal storage. Remove redundancy to streamline Renewal Application and enhance
	volume in containers in four Contact-Handled Packages	its readability. A reference to Permit Part 3, Table 3.1.1, WHB Unit,

Renewal Application Section	Description of Change(s)	Discussion
	is 640 ft ³ (18.1 m ³)."	has been added to this section. Table 3.1.1 states that waste may be stored at the TRUDOCKs in up to four CH packages; this maximum capacity listed in Table 3.1.1 reflects this volume.
Section A1-1c(1) Waste Handling Building Container Storage Unit; TRUPACT-III Management	Removed text pertaining to the characteristics of a container in good condition. Text added to indicate that decontamination activities will not be conducted on containers that are not in good condition or are leaking, consistent with the description provided for TRUPACT-II and HalfPACT management. Text modified to indicate that waste containers will be checked for external radiological surface contamination through the use of swipes and radiation monitoring equipment, consistent with radiological control procedures pursuant to 10 CFR Part 835, and if local decontamination activities are opted for, the work will be conducted in the WHB Unit, consistent with radiological control procedures.	Remove redundancy to streamline the Renewal Application and enhance its readability; this information is provided in Section A1-1b. The radiation protection standards are governed by the DOE, pursuant to 10 CFR Part 835, <i>Occupation Radiation Protection</i> . No Permit conditions are being removed, and no changes are being proposed relative to decontamination practices associated with hazardous waste or hazardous waste constituents. The changes make reference to the governing DOE standards for radiological control procedures, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to the DOE standards, should those standards be revised.
	from the TRUPACT-III in Room 108, it is placed on a facility pallet and moved to the CH Bay "or Room 108" for storage.	Room 108 is an authorized CH TRU mixed waste storage location within the WHB Unit.
Section A1-1c(1)	Revised text to indicate that the shaded areas of Figure M-1 in the CH Bay and Room 108 (CH Bay Storage Area) are available for TRU mixed waste storage as long as sufficient aisle space (i.e., a minimum of 44 in (1.1m)) is maintained.	Provide clarification and remove unnecessary prescriptive detail that is not required by the New Mexico Hazardous Waste Regulations. There is no reason to clearly mark the lateral limits of the CH Bay Storage Area if the entire area is permitted for storage. Maintaining sufficient aisle space (i.e., a minimum of 44 in) between the waste pallets and the walls of the CH Bay will be indicative of the lateral limits.
Waste Handling Building Container Storage Unit	Removed detail relative to the maximum capacity of the CH Bay Storage Area during normal operations and replaced with "Transuranic mixed waste may be stored in the CH Bay Storage Area of the WHB Unit in quantities no to exceed the maximum capacities specified in Permit Part 3, Table 3.1.1."	Enhance the readability of the Renewal Application by establishing a stronger correlation between Attachment A1 and the Part 3 conditions, which allows further streamlining of text in subsequent sections.
	Changed "The Derived Waste Storage Area is being permitted to allow containers in size up to a SWB to be used to accumulate derived waste" to "The Derived Waste Storage Area can accommodate containers in	Enhance the readability of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
	size up to an SWB to be used to accumulate derived waste."	
	Replaced detail relative to the maximum volume capacity of the Derived Waste Storage Area with a reference to Permit Part 3, Table 3.1.1.	Streamline text and establish a stronger correlation between Permit Attachment A1 and the Part 3 conditions, thereby enhancing the readability of the Renewal Application.
	Clarified text relative to aisle spacing. Revised text to clearly state that a minimum aisle spacing of 44 in (1.1 m) between loaded facility pallets will be maintained in the WHB Unit TRU mixed waste storage areas. Removed descriptive text relative to an aisle space of 60 in (1.5 m) between the west wall of the CH Bay and facility pallets.	Provide clarification and remove unnecessary prescriptive detail that is not required by the New Mexico Hazardous Waste Regulations. The Renewal Application text states that sufficient aisle spacing is required, but at a minimum, 44 inches will be maintained between loaded facility pallets. There is no regulatory requirement to maintain 60 inches between the wall of the CH Bay and facility pallets.
	Removed "Table A1-1 summarizes basic design requirements, principal codes, and standards for the WIPP facility" and replaced with "The 2009 Amended Renewal Application, Chapter M1, Table M1-1 (DOE, 2009) provided a summary of basic design requirements, principal does, and standards for the WIPP facility."	Remove obsolete information upon which the original design of the facility was based. This information no longer has any relevance in the Permit. However, for completeness, a reference to the 2009 Renewal Application, which contained this information, has been added.
Section A1-1c(1) Waste Handling Building Container Storage Unit; TRUPACT-II Type B Packaging	Revised text to indicate that the TRUPACT-II is a Type B package designed to meet the applicable requirements of 10 CFR Part 71.	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building	Added "or three shielded containers" to the description of container configurations within the HalfPACT.	Ensure the completeness and accuracy of the Renewal Application.
Container Storage Unit; HalfPACT Type B Packaging	Revised text to indicate that the HalfPACT is a Type B package designed to meet the applicable requirements of 10 CFR Part 71.	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit; TRUPACT-III Type B Packaging	Revised text to indicate that the TRUPACT-III is a Type B package designed to meet the applicable requirements of 10 CFR Part 71.	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit; Unloading Docks	Removed "(Also see Drawing 41 M 001W in Appendix D2 of the WIPP RCRA Part B Permit Application (DOE, 1997a))."	Remove outdated reference from the Renewal Application. The reference to Figure M-12 is sufficient; also, the revised drawing 41-M-001-W has been provided in the Part B Application, <i>Maps and Illustrations</i> .

Renewal Application Section	Description of Change(s)	Discussion
	Added missing figure reference for the Payload Transfer Station (Figure M-20).	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building	Revised text to clarify that the lift fixture is used for removing the lids and contents of the CH package.	Ensure the completeness and accuracy of the Renewal Application.
Container Storage Unit; Cranes, Unloading Devices, and Adjustable Center-of-Gravity Lift Fixtures	Deleted text specifying detail relative to the built-in level indicators on the lift fixture.	Remove unnecessary detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations, thereby ensuring accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit; Facility or Containment Pallets	Revised text to include two shielded container assemblies as a waste container configuration accommodated by a facility pallet.	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit; Facility Transfer Vehicle	Revised text to update and clarify the description of the Facility Transfer Vehicle.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit; Yard Transfer Vehicle	Revised description of the Yard Transfer Vehicle to indicate that it is an electric battery-powered vehicle.	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building	Added text to clarify that the maximum capacities of the RH Complex of the WHB Unit are specified in Permit Part 3, Table 3.1.1, <i>WHB Unit.</i>	Enhance the readability of the Renewal Application by establishing a stronger correlation between Attachment A1 and the Part 3 conditions, which allows further streamlining of text in subsequent sections.
Container Storage Unit; RH TRU Mixed Waste	Added text to specify that storage in the Hot Cell, Transfer Cell, and Facility Cask Loading Room also typically occurs to facilitate operations during a shift.	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit; Casks	Revised text to indicate that the RH-TRU 72-B and CNS 10-160B casks are Type B packages designed to meet the applicable requirements of 10 CFR Part 71.	Ensure the completeness and accuracy of the Renewal Application.
	Changed "ICV" to "inner lid."	Ensure the accuracy of the Renewal Application. The RH-TRU 72-B cask does not contain an Inner Confinement Vessel (ICV); although it functions in a similar fashion, the correct term, as it applies to the cask, is "inner vessel."
Section A1-1c(1) Waste Handling Building Container Storage Unit;	Added text to clarify that the overhead bridge crane "may be used to remove" the outer lid of the RH-TRU 72-B cask.	Ensure the completeness and accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
RH Bay Overhead Bridge Crane		
Section A1-1c(1) Waste Handling Building Container Storage Unit; Facility Cask	Revised text to add the Light Weight Facility Cask to the description of the Facility Cask.	Ensure the completeness and accuracy of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit; Manipulators	Clarified that Manipulators are used to transfer the swipes to the Shielded Material Transfer Drawer "for pertinent analysis."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section A1-1c(1) Waste Handling Building Container Storage Unit; Closed-Circuit Television Cameras	Added the Cask Unloading Room to the areas of operation of the camera system.	Ensure the completeness and accuracy of the Renewal Application.
	Text modified to clarify that the Controlled Area is a security-fenced enclosure; removed reference to figure since the Controlled Area is not depicted on Figure M-2 (replacement for Figure A1-2).	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section A1-1c(2) Parking Area Container	Removed text pertaining to normal maximum residence time in the PAU being typically five days.	Ensure the accuracy of the Renewal Application. This descriptive text is not necessary detail required for the Renewal Application, nor is it entirely accurate based on current operational practices; the relevant point is made in the last sentence of the paragraph (see below).
Storage Unit (PAU)	Reworded last sentence to read, "Under no circumstances shall a CH or RH package be stored in the PAU for more than 59 days after the date that CH or RH package was sealed at the generator site, as recorded in the ICV Closure Date field of the WIPP Waste Information System (WWIS) database."	Ensure the accuracy of the Renewal Application by creating better consistency between Attachment A1 and Permit Part 3, Section 3.1.2.6. The ICV Closure Date field in the WWIS applies to both CH and RH packages, regardless of the fact that the RH packages do not technically contain an Inner Confinement Vessel, but an inner vessel (as explained earlier in the changes made to the section on Casks).
Section A1-1c(2) Parking Area Container Storage Unit (PAU);	Added references to Permit Part 3, Table 3.1.2 and Section 3.1.2.3 relative to the maximum capacity of the PAU and the provisions for the use of the PAU Surge Storage Area.	Enhance the readability of the Renewal Application by establishing a stronger correlation between Attachment A1 and the Part 3 conditions.
Parking Area Unit Surge Storage Area	Removed "(not applicable to RH TRU waste shipments)" from bullet pertaining to inbound shipment delays that are imminent.	Provide clarification of the text by removing an exception to one of the provisions for the use of the PAU Surge Storage Area.
Section A1-1d Container Management	Removed "Containers are required to be closed at all times, unless waste is being placed in the container or	Remove redundancy within the section, thereby streamlining Renewal Application text and enhancing its readability. Although this statement

Renewal Application Section	Description of Change(s)	Discussion
Practices	removed." Removed detail associated with the container vent diameter.	is true, the information is reiterated in the subsequent paragraph. Remove unnecessary detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. Section A1-1c explains that each TRU mixed waste container is equipped with one or more DOE-approved filter vents.
	Revised text to clarify that the filter vents retain "radioactive" particulates. Revised text to clarify that off-normal events are unplanned added a new sentence to the paragraph that reads, "Shipments of waste from the generator sites will be stopped in an off-normal event which results in an interruption to normal waste handling operations that exceeds three days and could potentially cause the maximum permitted storage capacities and/or time limits to be exceeded."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application. Provide clarification and ensure the completeness and accuracy of the Renewal Application. The added sentence provides a stronger correlation between the requirement for suspension of shipments and the listed categories of off-normal events.
	Revised the categories of off-normal events to add clarifying text, "that (and) prevent unloading or downloading waste to the underground," to the first three bullets.	Provide clarification and ensure the completeness and accuracy of the Renewal Application. Any of the first three bullets could occur and not result in a prevention of unloading or downloading waste to the underground; in such cases, these would not be considered off- normal events.
	Removed sentence, "Shipments of waste from the generator sites will be stopped in any event which results in an interruption to normal waste handling operations that exceeds three days."	Provide clarification and ensure the completeness and accuracy of the Renewal Application. As currently written, this sentence does not tie well to the list of categories of off-normal events that precedes it. Because of this apparent disconnect, the requirement described in this section in unclear and difficult to implement at the WIPP facility. The requirement for suspension of shipments has been clarified by adding a new sentence to the paragraph introducing the bullet list, as explained above.
	Deleted paragraph, "Prior to receipt of TRU mixed waste at the WIPP facility, waste operators will be thoroughly trained in the safe use of TRU mixed waste handling and transport equipment. The training will include both classroom training and on the job training."	Remove redundancy, thereby streamlining the Renewal Application and enhancing its readability. This information is not relevant to the facility description; training required for TRU mixed waste management personnel is covered in Attachment F, <i>Facility Personnel</i> <i>Permit Training Program.</i>
Section A1-1d(1) Derived Waste	Added text to clarify that radiological decontamination activities will be performed consistent with radiological control procedures pursuant to 10 CFR Part 835. For hazardous waste decontamination only, water and a cleaning agent such as those listed in Permit Attachment D will be used.	Provide clarification of the Renewal Application text relative to the separate actions taken for radiological and hazardous waste constituent decontamination.

Renewal Application Section	Description of Change(s)	Discussion
	Added text to clarify that derived waste will be considered acceptable for management because no new "hazardous waste" constituents will be added.	Provide clarification of the Renewal Application text relative to the acceptability of derived waste for management and disposal at the WIPP facility.
	Removed paragraph referencing the Safety Analysis Report (DOE 1997b) and discussing the characteristics of the filter vents. The reference is incorrect, and the discussion of filter vents has been appropriately moved to Section A1-1b, with detail removed relative to the size the composition of the filter vents.	Ensure the accuracy of the Renewal Application. This change removes and incorrect reference and moves the appropriate information on container filter vents to Section A1-1b, <i>Description of</i> <i>Containers</i> .
	Text revised to remove descriptive information relative to the DOE's free release limits (including the footnote defining "dpm") and indicate that if the shipping package or waste container is contaminated in excess of the radiological control limits pursuant to 10 CFR Part 835, they will be managed in accordance with the radiological control procedures pursuant to 10 CFR Part 835.	The radiation protection standards are governed by the DOE, pursuant to 10 CFR Part 835, <i>Occupation Radiation Protection</i> . No Permit conditions are being removed, and no changes are being proposed relative to decontamination practices associated with hazardous waste or hazardous waste constituents. The changes make reference to the governing DOE standards for radiological control procedures, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to the DOE standards, should those standards be revised.
	Text revised to clarify the disposition of waste containers that are not in good condition, or are leaking, one option being to send the container to a third-party contractor.	Provide clarification and ensure the completeness and accuracy of the Renewal Application.
Section A1-1d(2) CH TRU Mixed Waste Handling	Text revised to indicate that if WIPP facility structures or equipment become contaminated, waste handling operations in the affected area will be managed in accordance with standard operating procedures, and the contaminated structures or equipment will be managed consistent with radiological control procedures pursuant to 10 CFR Part 835.	Ensure completeness of the Renewal Application by explaining reasonable measures to be taken, beyond operations being "immediately suspended." The current Permit text provides no procedural descriptions as to how contaminated structures or equipment would actually be dealt with.
	Added text to clarify that decontamination activities using waste and cleaning agents as specified in Permit Attachment D is specific to "Hazardous waste decontamination."	Provide clarification of the Renewal Application text relative to the separate actions taken for radiological and hazardous waste constituent decontamination.
	Removed paragraph beginning, "For waste containers," and incorporated into the prior paragraph with revisions to clarify the appropriate disposition of a waste container that has undergone decontamination.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Revised paragraph beginning, "For area	The radiation protection standards are governed by the DOE,

Renewal Application Section	Description of Change(s)	Discussion
	contamination ," to distinguish between the separate decontamination efforts associated with radiological and hazardous waste constituent contamination. Radiological decontamination will be managed consistent with radiological control procedures pursuant to 10 CFR Part 835, and hazardous waste decontamination will be conducted in accordance with the requirements of the Permit and the standards of NMAC 20.4.1.500 NMAC (incorporating 40 CFR Part 264). Details relative to the radiological control procedures to be used has been removed. Additionally, the example provided of a deferred clean-up activity has been removed.	pursuant to 10 CFR Part 835, Occupation Radiation Protection. No Permit conditions are being removed, and no changes are being proposed relative to decontamination practices associated with hazardous waste or hazardous waste constituents. The changes make reference to the governing DOE standards for radiological control procedures, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to the DOE standards, should those standards be revised. This change also clarifies the text relative to the separate actions taken for radiological and hazardous waste constituent decontamination.
	Removed paragraph beginning, "Small area decontamination."	This change streamlines the text by removing the example provided, which is not needed to support the description of deferred clean-up. Remove unnecessary descriptive information not required by the New Mexico Hazardous Waste Regulations; the prior discussion of area contamination references the radiological control procedures pursuant to 10 CFR Part 835.
	Changed "a large area contamination" to "that extensive area contamination" relative to contamination discovered inside the CH package.	Provide clarification as to what is meant by a large area contamination within the package.
	Revised text to indicate that TRU mixed waste products from decontamination will be managed as derived waste and in accordance with radiological control and waste handling procedures; removed associated footnote 5.	Provide clarification of the text by referencing the appropriate procedures and removing unnecessary detail associated with strategies for minimizing the spread of contamination. Such strategies are pursuant to DOE radiological control standards.
	Removed text associated with the inspection of container condition and the disposition associated with a container that is not in good condition. Added "three shielded container assemblies" to the	Remove redundancy, as this information is covered in an earlier section (TRUPACT-II and HalfPACT Management), thereby streamlining the Renewal Application and enhancing its readability. Ensure the completeness and accuracy of the Renewal Application.
	listing of possible container configurations within a TRUPACT-II. Replaced text associated with verifying container numbers against the Uniform Hazardous Waste	Ensure the accuracy of the Renewal Application by referencing the appropriate section of the Permit that describes the process for
	Manifest and the WWIS with a reference to Permit Attachment C, Section C-5b(1). Added "shielded container assemblies" to the listing of waste-container configurations that could be placed on	conducting this verification. Ensure the completeness and accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
	a facility pallet.	
	Added text to clarify that the Waste Shaft Conveyance lowers the loaded facility pallet to the Waste Shaft Station underground, not the HWDU. From there, an underground transporter is used to transport the CH TRU mixed waste to the underground HWDU.	Provide clarification relative to the description of the waste-handling process, thereby ensuring the accuracy of the Renewal Application.
Section A1-1d(3) RH TRU Mixed Waste	Removed reference to the schematics shown in Figures A1-28 and A1-29.	Remove unnecessary detail that is not required by the New Mexico Hazardous Waste Regulations. These figures are of poor quality and do not add value to the descriptive information provided in this section; therefore, they have not been incorporated into Attachment M, <i>Figures.</i>
Handling	Added text to clarify that differential air pressure between the RH TRU mixed waste handling locations is maintained "Whenever RH TRU mixed waste is present."	Provide clarification and ensure the accuracy of the Renewal Application; whenever RH waste is not present, differential pressures are not required to be maintained.
	Changed "ICV" to "inner vessel."	Ensure the accuracy of the Renewal Application. The RH-TRU 72-B cask does not contain an Inner Confinement Vessel; although it functions in a similar fashion, the correct term, as it applies to the cask, is "inner vessel."
	Revised text to clarify the suspension of the RH-TRU 72-B cask by the Cask Unloading Room Bridge Crane.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section A1-1d(3) RH TRU Mixed Waste Handling; RH-TRU 72-B Cask Unloading	Revised text to indicate that if surface contamination is found above acceptable levels as described in 10 CFR Part 835, the Permittees have the option to manage the RH TRU Canister consistent with radiological control procedures pursuant to 10 CFR Part 835, and hazardous waste decontamination, if needed, will be conducted in accordance with the requirements of the Permit and the standards of 20.4.1.500 NMAC (incorporating 40 CFR Part 264).	Provide clarification of the Renewal Application text relative to the separate actions taken for radiological and hazardous waste constituent decontamination and the appropriate governing standards.
	Revised text to clarify the transferring of the canister to the Facility Cask.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section A1-1d(3) RH TRU Mixed Waste Handling; Transfer of Disposal Canister into the Facility Cask	Replaced text associated with verifying container numbers against the WWIS with a reference to Permit Attachment C, Section C-5b(1).	Ensure the accuracy of the Renewal Application by referencing the appropriate section of the Permit that describes the process for conducting this verification.
Section A1-1d(4)	Revised text to clarify that an external survey is	Provide clarification, ensure accuracy, and enhance the readability of

Renewal Application Section	Description of Change(s)	Discussion
Handling Waste in Shielded Containers	performed on the ICV "lid" and removed reference to the ICV lid as a "closure lid."	the Renewal Application.
	Removed "contents of the" prior to "shielded container assembly," as the overhead bridge crane removes the contents of the HalfPACT, which is the shielded container assembly itself.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Revised text to remove parenthetical pertaining to physical damage of a container, "(severe rusting, apparent structural defects, signs of pressurization)."	Remove redundancy and streamline text; the description of characteristics of a waste container in good condition is provided in Section A1-1b, <i>Description of Containers.</i>
	Revised text to indicate that external surface contamination will be checked through the use of swipes and radiation monitoring equipment, consistent with radiological control procedures pursuant to 10 CFR Part 835; to clarify the disposition of the shielded container if it is not in good condition, including the option to send the HalfPACT to a third-party contractor; and to indicate that is local decontamination activities are opted for, the work will be conducted in the WHB Unit, consistent with radiological control procedures.	The radiation protection standards are governed by the DOE, pursuant to 10 CFR Part 835, <i>Occupation Radiation Protection</i> . No Permit conditions are being removed, and no changes are being proposed relative to decontamination practices associated with hazardous waste or hazardous waste constituents. The changes make reference to the governing DOE standards for radiological control procedures, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to the DOE standards, should those standards be revised.
	Replaced text associated with verifying container numbers against the Uniform Hazardous Waste Manifest and the WWIS with a reference to Permit Attachment C, Section C-5b(1).	Ensure the accuracy of the Renewal Application by referencing the appropriate section of the Permit that describes the process for conducting this verification.
	Removed text associated with the characteristics of a waste container that is not in good condition and the associated disposition options.	Remove redundancy and streamline text; the description of characteristics of a waste container in good condition is provided in Section A1-1b, <i>Description of Containers,</i> and the disposition options are discussed in prior sections pertaining to the shipping package and waste-container handling processes.
Section A1-1e(1) WHB Unit	Added text to clarify that if waste handling operations should stop for any reason with containers located at the TRUDOCK while still in the CH package, the primary waste container inspections will not be accomplished until "waste handling operations are resumed and" the containers of waste are removed from the CH package.	Clarify that if operations are stopped, they must first be resumed before the waste can be removed from the CH package, thereby ensuring the accuracy of the Renewal Application and enhancing its readability.
	Deleted paragraph, "Waste containers residing within a Contact-Handled Package are not inspected, as described in the first bullet in Section A1-1e(2)."	Clarify the text, remove redundancy, and enhance the readability of the Renewal Application. It is not clear what the relationship is between this requirement and the first bullet of Section A1-1e(2); furthermore, the previous discussion pertaining to the inspection of

Renewal Application Section	Description of Change(s)	Discussion
		primary waste containers that are still located within the CH package at the TRUDOCK covers this scenario.
	Deleted paragraph, "Waste containers will be inspected prior to reentering the waste management process line for downloading to the underground. Waste containers stored in this area will be inspected at least once weekly."	Remove redundancy and streamline text; this requirement is covered in the first sentence of the section, which states that waste containers are inspected, at a minimum, weekly, and prior to each movement.
	Deleted sentence, "Contact-Handled and Remote- Handled Packages located in the Parking Area Unit will be inspected weekly during use and prior to each reuse.	Remove redundancy and streamline text. It is not clear what is meant by "prior to each reuse;" furthermore, the first two sentences of the section state that inspections are conducted at a frequency not less than once weekly when waste is present and that the inspections are applicable to loaded, stored CH or RH package.
	Removed the parenthetical listing examples of shipping containers.	Streamline the Renewal Application by removing redundant information covered previously in Attachment A1.
	Changed "lifting the waste containers out for inspection" to "removing the waste containers for inspection."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section A1-1e(2) Parking Area Unit	Revised text pertaining to the longest amount of time waste containers would be uninspected to ensure consistency with previous Renewal Application text regarding the storage time limit in the PAU.	Ensure the accuracy of the Renewal Application and internal consistency with Attachment A1 and Permit Part 3.
	Deleted, "Venting the Contact-Handled or Remote- Handled Packages involves removing the outer lid and installing a tool in the port of the inner lid."	Ensure the accuracy of the Renewal Application by removing detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. As written, this is not an entirely accurate statement since in some cases, the package is not considered vented (from an NRC standpoint) until removal of both the OCV and ICV lids.
	Removed sentence, "The DOE believes that this strategy minimizes both the amount of shipping that is necessary and the amount of waste handling, while maintaining a reasonable inspection schedule," and added the following phrase to immediately precede the bullet list: "this will minimize the amount of shipping and waste handling, while maintaining a reasonable inspection schedule."	Enhance the readability of the Renewal Application.
	Changed "60-day limit" to "60-day NRC venting period" in second and third bullets.	Clarify that the 60-day limit is actually the 60-day NRC venting period.
	In the third bullet, revised text to indicate that the CH or RH package may be kept in the PAU no longer than day	Provide clarification and ensure consistent implementation of requirements. The current text states that the packages will be kept in

59 0	of the 60-day NRC venting period.	the PAU until day 30 (after receipt at the WIPP) or the expiration of the 60-day limit, whichever comes sooner. This requirement is in conflict with the Permit Part 3, Section 3.1.1, which states, "The Permittees shall not store sealed Contact-Handled or Remote-
		Handled Packages in the Parking Area Unit for more than 59 days after the date the Inner Containment Vessel (ICV) of the Package was sealed at the generator site." As a result of this conflict, the existing requirement in Attachment A1 is difficult to implement. This change clarifies the Renewal Application relative to the storage time limit in the PAU and at what point the CH or RH package must be moved into the WHB Unit to be unloaded such that the waste containers can begin to be inspected.
CH Cor rem cap the in a Per	evised text in the third bullet to read, "At that time the H or RH package will be moved into the WHB Unit. Intact-handled TRU mixed waste containers will be moved from their shipping package; if the maximum pacity of the CH Bay Storage Area has been reached, e Permittees may implement CH Bay Surge Storage accordance with the notification requirements of ermit Part 3, Section 3.1.1.3."	Provide clarification and ensure consistent implementation of requirements. Currently, the Permit states that once removed from the shipping package, the CH TRU mixed waste containers will be placed in one of the permitted storage areas in the WHB Unit. There is an apparent discrepancy here because the only permitted storage areas for CH TRU mixed waste in the WHB Unit are the CH Bay Storage Area and the CH Bay Surge Storage Area; however, in Section A1-1c(1), <i>CH Bay Surge Storage Area</i> , the text states that the capacity of the PAU must first be reached before the CH Bay Surge Storage Area can be used. As explained above, the text in Section A1-1c(1) has been modified to allow for an exception to the PAU being full when day 59 of the 60-day NRC venting period has been reached. The changes to this bullet in Section A1-1e(2) provide the option for the Permittees to use CH Bay Surge Storage if the CH Bay Storage Area is full and the PAU is not, but the shipping package must be vented and the waste containers removed for inspection.
was	emoved sentence, "The DOE will stop shipments of aste for any equipment outage that will extend beyond ee days."	Ensure the accuracy of the Renewal Application. This requirement is duplicative of a previous stated requirement in Section A1-1d, <i>Container Management Practices.</i> As currently written, this sentence is inconsistent with the list of categories of off-normal events in Section A1-1d. Because of this apparent disconnect, the requirement described in this section in unclear and difficult to implement at the WIPP facility. The requirement for suspension of shipments has been clarified by adding a new sentence to the paragraph introducing the bullet list in Section A1-1d, as explained earlier.
	emoved detail pertaining to the composition of the or coating.	Remove unnecessary information that is not required by the New Mexico Hazardous Waste Regulations. The floor coating does not

Renewal Application Section	Description of Change(s)	Discussion
		provide secondary containment of the waste; this function is provided by the concrete floor. The purpose of the floor coating is to resist oxidizing agents, thereby helping to keep the floor in good condition. The only characteristic of the floor coating that is pertinent to the Permit is that it be chemically compatible with the TRU mixed wastes accepted at the WIPP facility.
	Revised text to clarify that the WHB Unit storage areas are visually inspected weekly to verify that "the concrete floor" is in good condition and free of obvious cracks and gaps.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Added text to indicate that "RH waste containers located on drum carriage and placed on the Hot Cell floor" is an exception to the requirement that waste containers located in the permitted storage areas be elevated at least 6 in (15 cm) from the surface of the floor.	Ensure the completeness and accuracy of the Renewal Application. The Permit allows the storage of RH waste containers on the drum carriage on the floor of the Hot Cell; however, the carriage does not elevate the containers at least 6 in (15 cm) from the surface of the floor.
	Removed text, "at a designated storage area" relative to waste containers that have been removed from CH or RH packaging inside the WHB Unit so as to preclude exposure to the elements.	Remove unnecessary detail. The entire floor space of the WHB Unit is permitted for TRU mixed waste storage; therefore, there is no need to have a "designated storage area" within the WHB Unit.
	Added text to clarify that secondary containment at the CH Bay Storage Area inside the WHB Unit is provided by the "concrete" floor.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
References	Removed, "DOE, 1997b" reference for the Waste Isolation Pilot Plant Safety Analysis Report.	Ensure the accuracy of the Renewal Application. The text that contained this references has been revised, and this reference is no longer applicable.
Table A1-1 TRU Mixed Waste Containers	Removed the obsolete Table A1-1, "Basic Design Requirements, Principal Codes, and Standards," and replaced it with new Table A1-1, "TRU Mixed Waste Containers."	Remove obsolete information upon which the original design of the facility was based. It no longer has any relevance in the Permit. The new Table A1-1 summarizes and replaces information on waste containers that was removed from Section A1-1b, <i>Description of Containers</i> .
Table A1-2 CH TRU Mixed Waste Handling Equipment Capacities	Changed table title from "Waste Handling Equipment Capacities" to "CH TRU Mixed Waste Handling Equipment Capacities." Abbreviated "gallon," and added the liter-equivalent for the 55-, 85-, and 100-gal drums (e.g., 55-gal (208-L) drums). Corrected maximum gross weight of four-pack for 85-gal (322-L) drums from 4,500 lbs. to 4,000 lbs.	Ensure accuracy and enhance the readability of the Renewal Application.
Table A1-3	Changed "55-Gallon Drum" to "55-gal (208-L) Drum,"	Ensure accuracy and enhance the readability of the Renewal

Renewal Application Section	Description of Change(s)	Discussion
RH TRU Mixed Waste Handling Equipment Capacities	and added Light Weight Facility Cask and corresponding weight of 48,450 lbs.	Application.
Permit Figure A1-1 Waste Handling Building – CH TRU Mixed Waste Container Storage and Surge Areas	Moved to Attachment M, Figure M-1; added RH Bay storage areas, and changed figure title to "Waste Handling Building Unit – TRU Mixed Waste Container Storage and Surge Areas."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-1a Waste Handling Building Plan (Ground Floor)	Moved to Attachment M, Figure M-12.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-1b Waste Handling Building Plan (Room 108 Detail)	Figure removed; detail has been incorporated into Figures M-12 and M-59.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-2 Parking Area – Container Storage and Surge Areas	Moved to Attachment M, Figure M-2; changed figure title to "Parking Area Unit – TRU Mixed Waste Container Storage and Surge Areas."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-3 Standard 55-Gallon Drum (Typical)	Moved to Attachment M, Figure M-3.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-4 Standard Waste Box	Moved to Attachment M, Figure M-4.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-5 Ten-Drum Overpack	Moved to Attachment M, Figure M-5.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-6 35-Gallon Drum	Moved to Attachment M, Figure M-6.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-8a TRUPACT-II Shipping Container for CH Transuranic Mixed Waste (Schematic)	Moved to Attachment M, Figure M-17; changed title to "TRUPACT-II Type B Shipping Container."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-8b Typical HalfPACT Shipping Container for CH Transuranic Mixed Waste (Schematic)	Moved to Attachment M, Figure M-18; changed title to "Typical HalfPACT Type B Shipping Container."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-10 Facility Pallet for Seven	Moved to Attachment M, Figure M-21; changed title to "Facility Pallet."	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
Pack of Drums		
Permit Figure A1-10a Typical Containment Pallet	Moved to Attachment M, Figure M-22.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-11 Facility Transfer Vehicle, Facility Pallet, and Typical Pallet Stand	Moved to Attachment M, Figure M-23.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-12 TRUPACT-II Containers on Trailer	Moved to Attachment M, Figure M-37.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-13 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram	Moved to Attachment M, Figures M-38 and M-39.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-14a RH Bay Ground Floor	Combined with Figures A1-17a and A4-5 and moved to Attachment M, Figure M-13; changed title to "RH Bay Ground Floor and Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-15 100-Gallon Drum	Moved to Attachment M, Figure M-7.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-16 Facility Canister Assembly	Moved to Attachment M, Figure M-9.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-16a RH-TRU 72-B Canister Assembly	Moved to Attachment M, Figure M-10.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-17a RH Bay, Cask Unloading Room, Hot Cell, Facility Cask Loading Room	Combined with Figures A1-14a and A4-5 and moved to Attachment M, Figure M-13; changed title to "RH Bay Ground Floor and Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-17b RH Hot Cell Storage Area	Moved to Attachment M, Figure M-14.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-17c RH Canister Transfer Cell Storage Area	Combined with Figure A4-7 and moved to Attachment M, Figure M-15; changed figure title to "RH Canister Transfer Cell Storage Areas and Waste Transport	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
	Routes."	
Permit Figure A1-17d RH Facility Cask Loading Room Storage Area	Combined with Figure A4-6 and moved to Attachment M, Figure M-16; changed figure title to "RH Facility Cask Loading Room and Cask Unloading Storage Area and Waste Transport Route."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-18 RH-TRU 72-B Shipping Cask on Trailer	Moved to Attachment M, Figure M-25.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-19 CNS 10-160B Shipping Cask on Trailer	Moved to Attachment M, Figure M-26.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-20 RH-TRU 72-B Shipping Cask for RH Transuranic Waste (Schematic)	Moved to Attachment M, Figure M-27; changed figure title to "RH-TRU 72-B Type B Shipping Cask."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-21 CNS 10-160B Shipping Cask for RH Transuranic Waste (Schematic)	Moved to Attachment M, Figure M-28; changed figure title to "CNS 10-160B Type B Shipping Cask."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-22a RH-TRU 72-B Cask Transfer Car	Moved to Attachment M, Figure M-32.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-22b CNS 10-160B Cask Transfer Car	Moved to Attachment M, Figure M-33.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-23 RH Transuranic Waste Facility Cask	Moved to Attachment M, Figure M-29; changed title of figure to "RH Transuranic Waste Facility Cask and Light Weight Facility Cask."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-24 RH Facility Cask Transfer Car (Side View)	Moved to Attachment M, Figure M-34.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-25 CNS 10-160B Drum Carriage	Moved to Attachment M, Figure M-31.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A1-26 Surface and Underground RH Transuranic Mixed	Moved to Attachment M, Figure M-40.	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
Waste Process Flow		
Diagram for RH-TRU 72-		
B Shipping Cask		
Permit Figure A1-27	Moved to Attachment M, Figure M-41.	Streamline the Renewal Application and ensure its accuracy and
Surface and		readability.
Underground RH		
Transuranic Mixed		
Waste Process Flow		
Diagram for CNS 10-		
160B Shipping Cask		
Permit Figure A1-28	Figure removed.	Remove unnecessary detail that is not required by the New Mexico
Schematic of the RH		Hazardous Waste Regulations. The figure is not referenced in Permit
Transuranic Mixed		text, is of poor quality, and does not add value to the descriptive text
Waste Process for RH-		in Attachment A1; furthermore, there is not a comparable schematic in
TRU 72-B Shipping Cask		the Permit for the CH TRU mixed waste handling process.
Permit Figure A1-29	Figure removed.	Remove unnecessary detail that is not required by the New Mexico
Schematic of the RH		Hazardous Waste Regulations. The figure is not referenced in Permit
Transuranic Mixed		text, is of poor quality, and does not add value to the descriptive text
Waste Process for CNS		in Attachment A1; furthermore, there is not a comparable schematic in
10-160B Shipping Cask		the Permit for the CH TRU mixed waste handling process.
Permit Figure A1-30	Moved to Attachment M, Figure M-30.	Streamline the Renewal Application and ensure its accuracy and
RH Shielded Insert		readability.
Assembly		Toddubinty.
Permit Figure A1-31	Moved to Attachment M, Figure M-35.	Streamline the Renewal Application and ensure its accuracy and
Transfer Cell Shuttle Car	moved to Attachment M, Figure M-33.	readability.
Permit Figure A1-32	Moved to Attachment M, Figure M-36; changed figure	Streamline the Renewal Application and ensure its accuracy and
Facility Rotating Device	title to "Facility Cask Rotating Device."	readability.
	Moved to Attachment M, Figure M-19; changed figure	Streamline the Renewal Application and ensure its accuracy and
Permit Figure A1-33	title to "Typical TRUPACT-III Type B Shipping	readability.
Typical TRUPACT-III	Container."	Teadability.
Permit Figure A1-34	Moved to Attachment M, Figure M-8.	Streamline the Renewal Application and ensure its accuracy and
Typical Standard Large		readability.
Box 2		readability.
Permit Figure A1-35	Moved to Attachment M, Figure M-24.	Streamline the Renewal Application and ensure its accuracy and
Typical Yard Transfer		readability.
Vehicle		Teauability.
	Moved to Attachment M. Figure M.00	Streamling the Denouvel Application and ensure its assured and
Permit Figure A1-36	Moved to Attachment M, Figure M-20.	Streamline the Renewal Application and ensure its accuracy and
Payload Transfer Station		readability.

Renewal Application Section	Description of Change(s)	Discussion
Permit Figure A1-37 Typical Shielded Container	Moved to Attachment M, Figure M-11.	Streamline the Renewal Application and ensure its accuracy and readability.
	Attachment A	12
	Geologic Repos	itory
	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
	Figure references changed throughout to correspond with figure numbers in Attachment M, <i>Figures.</i>	Ensure the accuracy of the Renewal Application; Figures in Attachment A2 have been consolidated into Attachment M, Figures.
General	Ensured the following terms are uppercased: Waste Hoist Waste Shaft Conveyance Waste Shaft Station	Ensure accuracy and enhance the readability of the Renewal Application.
	Changed instances of "Salt Shaft" to "Salt Handling Shaft."	Ensure accuracy and enhance the readability of the Renewal Application.
	Clarified that ventilation flow is ventilation "airflow."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Made changes to units to establish internal consistency; included both English and Metric units, as appropriate.	Ensure accuracy and enhance the readability of the Renewal Application.
	Added text to provide a brief description of the underground Hazardous Waste Disposal Units (HWDUs) and reference to Figure M-42, which replaces Permit Attachment A3, <i>Typical Disposal Panel.</i>	Ensure completeness of the Renewal Application. Permit Attachment A3, which consists solely of a figure, is not being provided in the Renewal Application; it is being replaced with Figure M-42, <i>Typical Disposal Panel.</i> Attachment A4 has been renamed Attachment A3.
Section A2-1 Description of the Geologic Repository	Revised text to indicate that the underground HWDUs are "approximately" 2,150 ft beneath the ground surface.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Updated text to provide a description of the HWDUs for which TRU mixed waste disposal will be authorized in the renewed Permit. Removed references to Panel 9,	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	and added a sentence to indicate that in the future, the Permittees may request Permit modifications to allow disposal of TRU mixed waste in other areas of the underground, one of which may be Panel 10.	
Section A2-2a Geologic Repository	Revised first paragraph to clarify that compliance with the Permit ensures operations at the WIPP facility are	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
Design and Construction	safe and protective of human health and the environment.	
	Added "four four-packs of drums" to the list of container configurations that can be accommodated by the facility pallet.	Ensure completeness and accuracy of the Renewal Application.
Section A2-2a(1) CH TRU Mixed Waste Handling Equipment	Revised "Backfill" section to remove unnecessary detail that is not pertinent to the Permit or the New Mexico Hazardous Waste Regulations.	Streamline Permit text by removing unnecessary descriptive detail that is not required by the New Mexico Hazardous Waste Regulations. Backfill is an engineered barrier that is used to control radionuclide solubility, thereby enhancing the long-term performance of the repository relative to 40 CFR Part 191. The aspects of this discussion that are important to the Permit are that it will be emplaced in the underground in configurations depicted in Figure M-45; that it is comprised of a benign compound, and, therefore, should spill or breach occur, it would not result in a release of hazardous waste; and that the emplacement process requires no additional operational considerations beyond what is required for TRU mixed waste emplacement.
	Clarified that there is variation in the shaft diameters by changing "is" to "varies from," where appropriate.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section A2-2a(2) Shafts	Replaced reference to the Final Design Validation Report in Appendix D1 of the WIPP RCRA Part B Permit Application (DOE, 1997) with reference to Permit Attachment G2, <i>Waste Isolation Pilot Plant Shaft</i> <i>Sealing System Compliance Submittal Design Report.</i> Removed descriptive detail that is found in Permit Attachment G2.	Remove redundancy, thereby streamlining and enhancing the readability of the Renewal Application.
Section A2-2a(3) Subsurface Structures	Revised text to indicate that the underground HWDUs are "approximately" 2,150 ft beneath the ground surface.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Subsultace Siluciales	Changed "important underground equipment" to "designated underground equipment."	Ensure the accuracy of the Renewal Application; the word "important" is subjective.
Section A2-2a(3) Subsurface Structures	Revise text to indicate that the HWDU rooms are "separated" not "supported" by 100 ft- (30 m-) wide pillars.	Ensure the accuracy of the Renewal Application.
Underground Hazardous Waste Disposal Units (HWDUs)	Updated text to remove references to Panel 9, and to indicate that a future permit modification may be requested by the Permittees to allow disposal of TRU mixed waste in Panel 10.	Ensure the accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
	Changed "areas" to "access drifts."	Ensure the accuracy of the Renewal Application.
Section A2-2a(3) Subsurface Structures Underground Facilities Ventilation System	Revised text to clarify that the "air from the" four circuits is recombined near the bottom of the Exhaust Shaft.	Ensure the accuracy of the Renewal Application.
	Removed reference to "uncontaminated" areas in the North and Construction Circuits.	Ensure the accuracy of the Renewal Application.
	Changed "is necessary in order to" to "can" relative to the quantity of air needed to support the level of activity and the pieces of diesel equipment that are expected to be in operation.	Ensure the accuracy of the Renewal Application.
Section A2-2a(3) Subsurface Structures Underground Ventilation System Description	Clarified that the minimum ventilation rate to be maintained in each active room is 35,000 "standard" ft ³ . Revised text to indicate that this quantity of air, which is required to protect underground waste handling personnel working in an active disposal room, is based on calculations in Appendix D9 of the RCRA Part B Permit Application (DOE, 1997)	Ensure the completeness and accuracy of the Renewal Application.
	Removed redundant sentence referencing Permit Attachment O for actions to take if the active room ventilation rate of 35,000 scfm cannot be met.	Streamline the text of the Renewal Application, thereby enhancing its readability; this sentence appears toward the end of the subsequent paragraph.
	Changed "seal of the ventilation" to "bulkhead installation."	Ensure the accuracy of the Renewal Application; bulkheads restrict and control ventilation, but they do not "seal" the area from air flow.
	Changed reference for a typical bulkhead from "Figure A2-11a" to "Permit Attachment G1, Appendix G1-A."	Remove redundancy, streamline Renewal Application text, and enhance readability; this figure is duplicative in the Permit.
Section A2-2a(3) Subsurface Structures Underground Ventilation Filtration System Description with Buildings 416 and 417	Revised text to clarify that differential-pressure instrumentation is "located at each filter bank."	Ensure completeness and accuracy of the Renewal Application.
Section A2-2a(3) Subsurface Structures Underground Ventilation Filtration System Modes	Revised text to indicate that if only one of the main UVFS ventilation fans is available, underground operations will be limited because filtration exhaust fans cannot provide sufficient airflow to support the use "of numerous pieces" of diesel equipment."	Ensure the accuracy of the Renewal Application. In this this mode of operation, diesel equipment can be used; however, it will be limited due to the reduced airflow.
of Operation with Building 416	Removed "that may contain radioactive and hazardous waste constituents" relative to airborne particulates	Ensure the accuracy of the Renewal Application. This detail is ambiguous and also not entirely accurate; HEPA filtration does not

Renewal Application Section	Description of Change(s)	Discussion
	removed from the HEPA filtration system.	remove volatile organic compounds from the exhaust airflow.
	Removed references to "utility power" and replaced with "electric power" or "power."	Ensure the accuracy of the Renewal Application.
Section A2-2a(3) Subsurface Structures Underground Ventilation Normal Mode Redundancy	Removed subsection, "Underground Ventilation Normal Mode Redundancy."	Remove redundancy, thereby streamlining the Renewal Application text and enhancing readability. This section contains information that is duplicative with the prior subsection, <i>Underground Ventilation System Description</i> , which describes three main exhaust fans, two of which are used at a time in normal operation model.
Section A2-2a(4) RH TRU Mixed Waste Handling Equipment	Changed "Horizontal Emplacement and Retrieval Equipment" to "Horizontal Emplacement Machine."	Ensure the completeness and accuracy of the Renewal Application; see discussion below.
Section A2-2b Geologic Repository Process Description	Deleted paragraph, "Prior to receipt of TRU mixed waste at the WIPP facility, waste operators will be thoroughly trained in the safe use of TRU mixed waste handling and transport equipment. The training will include both classroom training and on the job training."	Remove redundancy, thereby streamlining the Renewal Application text and enhancing its readability. This information is not relevant to the facility description; training required for TRU mixed waste management personnel is covered in Attachment F, <i>Facility Personnel</i> <i>Permit Training Program.</i>
Section A2-2b Geologic Repository Process Description RH TRU Mixed Waste Emplacement	Replace descriptive text pertaining to the Horizontal Emplacement and Retrieval Equipment (HERE) with text describing the use of the Horizontal Emplacement Machine (HEM).	Provide necessary updates, thereby ensuring the completeness and accuracy of the Renewal Application. The HERE is obsolete, as it has been abandoned-in-place in Room 6, Panel 7. The HEM, or functionally equivalent equipment, will be used in its place when RH waste-emplacement operations resume.
	Removed text in the first paragraph that is redundant with information contained in Attachment A1, <i>Container Storage.</i>	Remove redundancy, thereby streamlining the text of the Renewal Application and enhancing its readability; this change also establishes better consistency between this section the preceding section, which discusses the RH TRU mixed waste emplacement process as beginning when the waste is loaded onto the Waste Shaft Conveyance.
Section A2-2b Geologic Repository Process Description CH TRU Mixed Waste Emplacement	Revised text to indicate that "typically" Room 7 is the first room to be filled in a panel; stacking of CH TRU mixed waste begins at the exhaust side of the room and proceeds down the access drift; and the waste- emplacement process is repeated for Room 6, and so on until Room 1 is filled.	Ensure the accuracy of the Renewal Application by revising text to allow some flexibility in the waste-emplacement configuration. This change is consistent with text elsewhere in the Renewal Application that pertains to waste-emplacement order and configuration (e.g., the subsequent paragraph in Attachment A2, Figure A2-8 (Figure M-48), and Attachment N).
	Changed "It is anticipated that the space between the wall and the container could be from 8 to 18 in. (20 to 46 cm)" to "The space between the wall and the container ranges from 8 to 18 in. (20 to 46 cm)."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Removed, "Bags of backfill will occupy some of this	Remove unnecessary detail that does not support a Permit

Renewal Application Section	Description of Change(s)	Discussion
	space."	requirement and is not required by the New Mexico Hazardous Waste Regulations. This statement is not pertinent to the description of the CH TRU mixed waste-emplacement process; the following statement, "Space is required over the stacks of containers to assure adequate ventilation for waste handling operations," is the important point to be made.
	Changed the panel closure estimated duration from "an additional 150 days" to "an additional 180 days following placement of the final waste in the panel."	Ensure accuracy of the Renewal Application and consistency with Attachment G relative to the estimated duration for panel closure.
Section A2-5a(1) Ground-Control Program	Revised paragraph to accurately describe the purpose of the ground-control program and applicability of the LWA and the MSHA regulations to the ground-control program.	Ensure accuracy of the Renewal Application.
Section A2-5b(2) Geomechanical Monitoring	Removed reference to Figure A2-13.	Remove unnecessary information that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. The figure is being removed because it is of poor quality and the reference in the text of Attachment A2 is vague.
Monitoring	Added reference to the annual Geotechnical Analysis Report (GAR).	Ensure completeness and accuracy of the Renewal Application.
Section A2-5b(2(a) Description of the	Clarified that the borehole extensometer is installed "near," not "at," the center of each disposal room.	Ensure the accuracy of the Renewal Application.
Geomechanical Monitoring System	Changed "rock conditions" to "ground conditions."	Ensure the accuracy of the Renewal Application.
Section A2-5b(2)(b) System Experience	Removed obsolete historical information relative to system experience gained from the geomechanical monitoring of Panel 1; retained the last paragraph as part of Section A2-5b(2)(a). Clarified that WIPP excavations are "repository" excavations.	Remove obsolete information that no longer has any relevance in the Permit.
References	Added reference to the 2020 WIPP Hazardous Waste Facility Permit Renewal Application.	Ensure completeness and accuracy of the Renewal Application.
Table A2-1 CH TRU Mixed Waste Handling Equipment Capacities	Added units to the table subheadings, and removed the units from the line items. Added "SLB2 forklift" to the list of equipment. Abbreviated "gallon," and added the liter- equivalent for the 55-, 85-, and 100-gal drums (e.g., 55- gal (208-L) drums). Corrected maximum gross weight of four-pack for 85-gal (322-L) drums from 4,500 lbs. to 4,000 lbs.	Ensure completeness and accuracy of the Renewal Application.
Table A2-2	Removed "Inclinometers" from the instrumentation listed	Ensure the completeness of the Renewal Application. Inclinometers

Renewal Application Section	Description of Change(s)	Discussion
Instrumentation Used in Support of the Geomechanical Monitoring System	in the table.	are no longer used to support the geomechanical monitoring system.
Table A2-3 RH TRU Mixed Waste Handling Equipment Capacities	Added units to the table subheadings, and removed the units from the line items. Abbreviated "gallon," and added the liter-equivalent for the 55-gal drum (i.e., 55- gal (208-L) drum). Added "Light Weight Facility Cask" to list of equipment.	Ensure completeness and accuracy of the Renewal Application.
Permit Figure A2-1 Repository Horizon	Moved to Attachment M, Figure M-43; changed title to "Repository Horizon and Underground Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-2 Spatial View of the Miscellaneous Unit and Waste Handling Facility	Combined with Figure H1-1 and moved to Attachment M, Figure M-44.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-3 Facility Pallet for Seven- Pack of Drums	Combined with Figure A1-10 and moved to Attachment M, Figure M-21; changed title to "Facility Pallet."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-5 Typical Backfill Sacks Emplaced on Drum Stacks	Combined with Figure A2-5a and moved to Attachment M, Figure M-45; changed title to "Typical Backfill Sacks Emplaced on Drum Stacks and Emplacement Configurations."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-5a Potential MgO Emplacement Configurations	Combined with Figure A2-5 and moved to Attachment M, Figure M-45; changed title to "Typical Backfill Sacks Emplaced on Drum Stacks and Emplacement Configurations."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-6 Waste Transfer Cage to Transporter	Moved to Attachment M, Figure M-46.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-7 Push-Pull Attachment to Forklift to Allow Handling of Waste Containers	Moved to Attachment M, Figure M-47.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-8 Typical RH and CH Transuranic Mixed Waste Container	Moved to Attachment M, Figure M-48.	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
Disposal Configuration		
Permit Figure A2-9a Underground Ventilation System Airflow	Moved to Attachment M, Figure M-49.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-9a-NFB Underground Ventilation System Airflow (with Building 416)	Moved to Attachment M, Figure M-52.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-9b Underground Ventilation System Airflow (with SVS)	Moved to Attachment M, Figure M-50.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-11 Typical Room Barricade	Moved to Attachment M, Figure M-51.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-11a Typical Bulkhead	Figure removed.	Streamline the Renewal Application by removing duplicative information. This figure is identical to one shown in Attachment G, Appendix G1-B. The reference in the text of Attachment A2 has been changed to Permit Attachment G, Figure G1-B.
Permit Figure A2-12 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram	Combined with Figure A1-13 and moved to Attachment M, Figures M-38 and M-39.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-13 Layout and Instrumentation – As of 1/96	Figure removed.	Remove unnecessary information that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. This figure is of poor quality, and the reference to the figure in the text of Attachment A2 is vague and unclear; therefore, the figure does not effectively support the descriptive information.
Permit Figure A2-14 Facility Cask Transfer Car (Side View)	Combined with Figure A1-24 and moved to Attachment M, Figure M-34; changed title to "RH Facility Cask Transfer Car (Side View)."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-15 Typical Emplacement Equipment	Figure removed.	Remove obsolete information. This figure is an illustration of the HERE, which has been abandoned-in-place and is now obsolete. The HEM is shown in Figure M-53.
Permit Figure A2-15a Typical Emplacement Equipment	Moved to Attachment M, Figure M-53.	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
Permit Figure A2-16 RH TRU Waste Facility Cask Unloading from Waste Shaft Conveyance	Moved to Attachment M, Figure M-54.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-17 Facility Cask Installed on the Typical Emplacement Equipment	Figure removed.	Remove obsolete information. This figure depicts the HERE; the HEM is depicted in Figure M-53, and the shield plug is depicted in Figure M-55.
Permit Figure A2-18 Installing Shield Plug	Figure removed.	Remove obsolete information. This figure depicts the HERE; the Facility Cask is depicted in Figure M-29, and the HEM is depicted in Figure M-53.
Permit Figure A2-19 Shield Plug Supplemental Shielding Plate(s)	Moved to Attachment M, Figure M-55; changed title to "Section of Bore Hole Showing the Shield Plug and Supplemental Shielding Plate(s)."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A2-20 Shielding Layers to Supplement RH Borehole Shield Plugs	Figure removed.	Remove unnecessary detail that is not required by the New Mexico Hazardous Waste Regulations. The detail shown in this figure is related to radiological control, not hazardous waste management; furthermore, the figure is not referenced in the Attachment A2 text. The shielding plates are shown in Figure M-55.
Figure A2-21	Combined with Figure A2-19 and moved to Attachment M, Figure M-55.	Streamline the Renewal Application and ensure its accuracy and readability.
	Permit Attachme	ent A3
	Typical Disposal	Panel
General	Removed attachment; moved figure to Attachment M, Figure M-42.	Streamline the Renewal Application and ensure its accuracy and readability.
	Attachment A3 (Permit A	ttachment A4)
	Traffic Patter	ns
	Renumbered to Attachment A3; changed section numbers throughout. Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application. Ensure accuracy and enhance the readability of the Renewal
General		Application.
	Figure references changed throughout to correspond with figure numbers in Attachment M, <i>Figures.</i>	Ensure the accuracy of the Renewal Application; figures in Attachment A3 have been consolidated into Attachment M, <i>Figures.</i>

Renewal Application Section	Description of Change(s)	Discussion
Section A3-1	Revised description of two access ways to the WIPP facility: one via the Louis Whitlock Road and the second via the South Access Road.	Ensure the accuracy of the Renewal Application.
Traffic Information and Traffic Patterns	Replaced reference to Table A4-1 with reference to Chapter G, Table G-1 of the 2009 Amended Renewal Application.	Ensure completeness and accuracy of the Renewal Application. Permit Table A4-1 has been removed from the Renewal Application; therefore a reference to the 2009 Amended Renewal Application has been provided in its place.
	Changed "Site traffic" to "Traffic within the security fence."	Clarify the Renewal Application text, thereby ensuring its accuracy relative to the traffic description within this section.
Section A3-2	Changed "with a frequency of perhaps 10 per hour" to "with an approximate frequency of 10 per hour."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Facility Access and Traffic	Removed detail associated with calculations to support the anticipated maximum load of 115,000 lb, and added a reference to Chapter G of the 2009 Amended Renewal Application.	Remove obsolete information upon which the original design of the facility was based. It no longer has any relevance in the Permit.
	Changed "payload transfer station in Room 108" to "bolting station in Room 108 of the WHB."	Ensure the accuracy of the Renewal Application.
Section A3-3 Waste Handling Building	Added "three shielded containers" to the listing of possible container configurations within a HalfPACT.	Ensure the completeness and accuracy of the Renewal Application.
Traffic	Added "two three-packs of shielded container assemblies" to the listing of possible container configurations on a facility pallet.	Ensure the completeness and accuracy of the Renewal Application.
Section A3-4 Underground Traffic	Removed, "The exhaust drift in the waste disposal area will normally not be used for personnel access."	Ensure the accuracy of the Renewal Application. While it is true that the exhaust drift in the waste-disposal area will not be used as a travel pathway, this area is routinely accessed for ground-control, to take ventilation readings, etc. Therefore, this statement is not entirely accurate. The important point is captured in the preceding sentence: in general, traffic is restricted to the intake ventilation drift to maximize isolation of waste-handling activities from personnel.
	Clarified that airlock and bulkhead vehicle doors are equipped with warning bells or strobe lights to alert personnel when door movement, i.e., "opening or closing," is imminent.	Ensure accuracy and enhance the readability of the Renewal Application.
References	Added reference to the 2020 WIPP Hazardous Waste Facility Permit Renewal Application.	Ensure the completeness of the Renewal Application.
Permit Table A4-1 Waste Isolation Pilot Plant Site Design	Remove table.	Remove obsolete information upon which the original design of the facility was based. It no longer has any relevance in the Permit.

Renewal Application Section	Description of Change(s)	Discussion
Designation Traffic		
Parameters Permit Figure A4-1 General Location of the WIPP Facility	Combined with Figure L-1 and moved to Attachment M, Figure M-56.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-2 WIPP Traffic Flow Diagram	Moved to Attachment M, Figure M-57.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-2-NFB WIPP Traffic Flow Diagram with Building 416	Moved to Attachment M, Figure M-58.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-3 Waste Transport Routes in Waste Handling Building – Container Storage Unit	Combined with Figures A4-3a, and A4-3b and moved to Attachment M, Figure M-59; changed title to "Typical CH Mixed Waste Transport Routes in Waste Handling Building Container Storage Unit."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-3a Typical Transport Route for TRUPACT-III and Standard Large Box 2	Combined with Figures A4-3 and A4-3b and moved to Attachment M, Figure M-59; changed title to "Typical CH Mixed Waste Transport Routes in Waste Handling Building Container Storage Unit."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-3b Typical Transport Route for TRUPACT-II and Standard Large Box 2 in Room 108	Combined with Figures A4-3 and A4-3a and moved to Attachment M, Figure M-59; changed title to "Typical CH Mixed Waste Transport Routes in Waste Handling Building Container Storage Unit."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-4 Typical Underground Transport Route Using E-140	Combined with Figures A2-1, A4-4a, G-1, and G-6 and moved to Attachment M, Figure M-43; changed title to "Repository Horizon and Underground Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-4a Typical Underground Transport Route Using W-30	Combined with Figures A2-1, A4-4, G-1, and G-6 and moved to Attachment M, Figure M-43; changed title to "Repository Horizon and Underground Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-5 RH Bay Waste Transport Routes	Combined with Figures A1-14a and A1-17a and moved to Attachment M, Figure M-13; changed title to "RH Bay Ground Floor and Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
Permit Figure A4-6 RH Bay Cask Loading Room Waste Transport Route	Combined with Figure A1-17d and moved to Attachment M, Figure M-16; changed figure title to "RH Facility Cask Loading Room and Cask Unloading Storage Area and Waste Transport Route."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure A4-7 RH Bay Canister Transfer Cell Waste Transport Route	Combined with Figure A1-17c and moved to Attachment M, Figure M-15; changed figure title to "RH Canister Transfer Cell Storage Areas and Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.
	Attachment	c
	Waste Analysis	Plan
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
General	Updated document references, as applicable. Updated references to Permit sections, as needed.	Ensure the completeness and accuracy of the Renewal Application. Ensure the completeness and accuracy of the Renewal Application.
	Added "waste" after "contact-handled" and "remote- handled," as applicable.	Ensure accuracy and enhance the readability of the Renewal Application.
	Replaced "§264.600" with "Part 264, Subpart X."	Ensure accuracy and enhance the readability of the Renewal Application.
Section C-0 Introduction and Attachment Highlights	Deleted "Some TRU mixed waste is retrievably stored at the DOE generator/storage sites. Additional TRU mixed waste will be generated and packaged into containers at these generator/storage sites in the future. TRU mixed waste will be retrieved from storage areas at a DOE generator/storage site."	Remove unnecessary detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. Although the waste characterization requirements described in the <i>Waste Analysis Plan</i> are the same for both retrievably-stored and newly-generated waste streams, procedures vary somewhat, as described in subsequent sections of this attachment and Renewal Application Attachments C3 and C4. The sentences that have been removed are not relevant to these subsequent discussions.
	Replaced "grouped by" with "assigned to."	Ensure accuracy and enhance the readability of the Renewal Application.
Section C-0a Waste Characterization	Replaced "Wastes" with "Waste."	Ensure accuracy and enhance the readability of the Renewal Application.
	Removed "Radiolysis may also generate halogenated volatile organic compounds."	Streamline the Renewal Application by removing redundant language and unnecessary detail in Attachment C. Volatile Organic Compounds are monitored at the WIPP facility in accordance with Renewal Application Attachment N. Transuranic waste is the source of VOCs, regardless of their origin.

Renewal Application Section	Description of Change(s)	Discussion
	Replaced "on the WIPP Home Page" with "as specified in Permit Part 1, Section 1.11."	Streamline Renewal Application text by referencing requirement from Permit Part 1.
Section C-0b	Replaced "on the WIPP Home Page and inform those on the email notification list as specified in Permit Section 1.11." with "as specified in Permit Part 1, Section 1.11."	Streamline Renewal Application text by referencing requirement from Permit Part 1.
AK Sufficiency Determination	Added "The NMED will evaluate the Determination Request, determine the adequacy of the Determination Request, and notify the DOE as to whether or not it concurs with its provisional approval."	Clarify text regarding the actions taken by the NMED upon receipt of the Determination Request to ensure the completeness and accuracy of the Renewal Application.
	Added ", only if there are actual plans to seek an AK Sufficiency Determination; otherwise no action is required."	Clarify Renewal Application text relative to the Permittees' reporting requirements if there are no plans to seek an AK Sufficiency Determination for the upcoming federal fiscal year.
Section C-1d Control of Waste	Added "EPA" before "hazardous waste numbers."	Provide clarification and ensure consistency in the Renewal Application text.
Acceptance	Replaced "for WIPP disposal" with "destined for disposal at the WIPP facility."	Provide clarification and enhance the readability of the Renewal Application.
Section C-2 Waste Characterization Program Requirements and Waste Characterization Parameters	Added "EPA" before "hazardous waste numbers."	Provide clarification and ensure consistency in the Renewal Application text.
Section C-3a Acceptable Knowledge	Replaced "five" with "the following."	Streamline the Renewal Application text and enhance its readability.
Section C-3b Radiography and Visual Examination	Replaced "for WIPP disposal" with "from disposal at the WIPP facility."	Ensure accuracy and enhance the readability of the Renewal Application.
Section C-5a Phase I Waste Stream Screening and Verification	Replaced "Additional" with "Subsequent."	Ensure the accuracy and readability of the Renewal Application.
Section C-5a(1) WWIS Description	Removed "Read-only access to the WWIS will be provided to NMED."	Streamline the Renewal Application text by removing redundant descriptive information that is provided in the prior section.
Section C-5a(2) Examination of the Waste Stream Profile Form and Container Data	Replaced "DOE" with "the Permittees."	Clarify that it is the responsibility of the Permittees to reassess the site waste characterization program.

Renewal Application Section	Description of Change(s)	Discussion
Checks		
Section C-5b(1) Examination of the EPA Uniform Hazardous Waste Manifest and Associated Waste Tracking Information	Replaced "Package (container or canister)" with "Container or canister."	Ensure the accuracy of the Renewal Application.
Section C-8	Added "on EPA Form 8700-13 A/B."	Ensure the completeness of the Renewal Application.
Reporting	Replaced "time period covered by the report" with "previous year."	Clarify the reporting period for the biennial report.
Table C-3 WIPP Waste Information	Replaced "Hazardous Code" with "EPA Hazardous Waste Number."	Provide clarification and ensure consistency in the Renewal Application text.
System Data Fields	Replaced "multiple occurring" with "recurring."	Enhance the readability of the Renewal Application.
Table C-5 Listing of Permitted EPA Hazardous Waste Numbers	Added "EPA" in title.	Provide clarification and ensure consistency in the Renewal Application text.
Figure C-2	Added Figure C-2.	Ensure completeness of the Renewal Application. This figure was inadvertently left out in a previous revision to the Permit.
	Attachmen	t C1
	Waste Characterization	Testing Methods
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
Section C1-1	Replaced "One or more training" with "Training."	Enhance the readability of the Renewal Application. "Training containers" is plural; therefore, "one or more" is implied.
Radiography	Removed "with items."	Remove redundancy and enhance the readability of the Renewal Application. The text "with item" is included in the parenthetical.
	Added "and internal containers of various sizes."	Ensure the completeness and accuracy of the Renewal Application.
	Attachmen	t C3
Quali	ty Assurance Objectives and Data Validation Te	chniques for Waste Characterization Methods
	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal
General		Application.

Renewal Application Section	Description of Change(s)	Discussion
Section C3-2 Non Destructive Examination Methods	Added "methods."	Enhance the readability of the Renewal Application by clarifying that the QAOs apply to the NDE methods.
	Replaced "the independent review of acceptable knowledge information" with "independent reviews." Deleted "All sites must assign hazardous waste number	Enhance the readability of the Renewal Application by removing redundancy. Remove an unnecessary requirement that does not support a Permit
Section C3-3 Acceptable Knowledge	in accordance with Permit Attachment C4-3b and provide this information regarding its waste to other sites who store or generate a similar waste stream."	requirement and is not required by the New Mexico Hazardous Waste Regulations. Generator/storage sites are required to characterize only the waste they generate and are not obligated to provide information to other sites for the purposes of ensuring comparability across the sites. Comparability is ensured, as stated in the Renewal Application, through sites meeting the training requirements and complying with the minimum standards outlined for procedures that are used to implement the AK process.
Section C3-4a Data Generation Level	Replaced "readable" with "unreadable."	Ensure the accuracy of the Renewal Application.
Section C3-4b Project Level	Remove paragraph beginning "The Site Project Manager shall ensure that a repeat of the data"	Remove a requirement that is not necessary to support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. Data collected at the generator/storage sites over the last ten years indicate that this is a redundant review that does not result in findings ¹ . Should any discrepancies between the initial data- generation level review and the quarterly repeat be observed, the Permit does not prescribe resulting corrective action. Therefore, this requirement is not only redundant, it is meaningless.
Section C3-6a Data Generation Level	Replaced "serial" with "identification."	Ensure the accuracy of the Renewal Application.
Section C3-6b(2) Characterization Information Summary	Added ", if applicable." Added "EPA" before "hazardous waste number."	Clarify the text of the Renewal Application and enhance its readability. Provide clarification and ensure consistency in the Renewal Application text.
Section C3-7 Nonconformances	Added "If nonconformances are not identified in a given month, a report is not required."	Clarify Renewal Application text relative to the Permittees' reporting requirements if there are no nonconformances identified in a given month.
Section C3-9 Changes to WAP-	Added "data-quality affecting."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Related Plans or	Added "If changes to data-quality affecting plans and	Clarify Renewal Application text relative to the Permittees' reporting

¹ Nuclear Waste Partnership LLC. (2019, October 25). *Transmittal of Quarterly Repeat Data*. Carlsbad, New Mexico.

Renewal Application Section	Description of Change(s)	Discussion
Procedures	procedures are not identified in a given month, a report is not required."	requirements if there are no changes to data-quality affecting plans and procedures identified in a given month.
	Attachment C	54
	TRU Mixed Waste Characterization Us	ing Acceptable Knowledge
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
Section C4-3g Audits of Acceptable Knowledge	Revised paragraph pertaining corrective actions associated with AK compilation and/or EPA hazardous waste number assignment as follows: "After the audit is complete, the DOE will provide the site with preliminary results at a close-out meeting. The DOE will prepare a final audit report that includes the observations and findings identified during the audit. Sites shall respond to the audit findings and identify corrective actions. Audit results will be included in the final audit report (Permit Attachment C6). If AK procedures do not exist, the required information is not available, or corrective actions (i.e., CARs) are associated with deficiencies in the AK compilation process (i.e., the minimum required information in Section C4-2 has not been collected and organized to present the required information on the subject waste stream(s)), and/or EPA hazardous waste number assignment is not accurate, the Permittees will not manage, store, or dispose TRU mixed waste for the subject waste stream(s). Permit Attachment C3, Section C3-7, <i>Nonconformances</i> , requires the responsible organization(s) to review CARs and evaluate the extent of condition. If, during the corrective action process, the extent of condition is determined to be applicable to other waste streams, the Permittees will not manage, store, or dispose of TRU mixed waste from those affected waste streams. Management, storage, or disposal of the affected waste streams at the WIPP facility will not resume until the DOE agrees that the corrective actions have been implemented and the site complies with the applicable requirements of the WAP."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application. The required AK information that must be compiled for each waste stream is listed in Sections C4-2b and C4-2c, as applicable. If during an audit, the auditor discovers that the minimum AK information required by Section C4-2 has not been compiled, a CAR may be issued. There are instances when an auditor may issue a CAR against generator/storage site AK standard operating procedures, which delineate the process for compilation of AK, for deficiencies not associated with the completeness of the AK information. For example, failure to complete administrative tasks per the AK procedures such as signing documents, checking appropriate boxes, and placing copies in required repositories does not constitute a failure to collect the minimum information required for waste characterization per Section C4-2. Therefore, in order to avoid such a broad interpretation of AK completeness, clarification is needed. The Permit currently states that the Permittees "will not manage, store, or dispose TRU mixed waste for the subject waste summary category if, during the audits of generator/storage sites, CARs are identified associated with AK compilation." The Permit further states that Permittees will not resume such activities until the DOE determines that all corrective actions have been implemented. As described in Section C4-3c of the Permit, the AK documentation that comprises the auditable record is assembled by waste stream. If a deficiency in AK compilation is identified for a particular waste stream, the DOE corrective action process requires that the responsible organization evaluates the extent of the condition associated with the resulting CAR. Through this evaluation, the Permittees can clearly identify which waste streams are impacted by the audit finding(s); therefore, it is not necessary for the cessation of TRU mixed waste management, storage, or disposal to extend to the entire waste summary category group but rather to

Renewal Application Section	Description of Change(s)	Discussion
		observed deficiency.
	Attachment (C5
	Quality Assurance Project P	Ian Requirements
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
	Attachment	C6
	Audit and Surveillanc	e Program
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
Section C6-2 Audit Procedures	Removed "annual" from the sixth bullet.	Ensure the accuracy of the Renewal Application. This bullet pertains to all certification audits, both initial and recertification.
Section C6-3 Audit Position Functions	Added "DOE" to last bullet in the first list.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Changed "DOE's tracking systems" to "the DOE's CAR tracking system."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section C6-4 Audit Conduct	Removed "and observations" so that the sentence reads, "Deficiencies (items corrected during the audit and CARs) will be tracked to completion according to established procedure(s)."	Ensure the accuracy of the Renewal Application; observations are not tracked to completion.
Tables General	Made table consistent with revisions to the corresponding text sections.	Ensure consistency within the Renewal Application.
	Attachment (C7
	TRU Waste Confir	mation
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
	Updated references to Permit sections, as needed.	Ensure the completeness and accuracy of the Renewal Application.
Introduction	Added "waste analysis requirements of the" to the first sentence.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
C7-1 Permittee Confirmation of TRU Mixed Waste	Revised text to indicate that waste confirmation occurs after waste containers have been certified for "shipment to and" disposal at the WIPP facility.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
C7-1b Radiography	Replaced "Although these six components are required,	Streamline the Renewal Application by removing redundancy, thereby

Renewal Application Section	Description of Change(s)	Discussion
Methods Requirements	it" with "It."	enhancing its readability.
C7-1c Visual	Added "who witnessed the packaging of the waste."	Ensure the completeness of the Renewal Application.
Examination Methods Requirements	Added "/audio."	Ensure the completeness of the Renewal Application.
C7-2 Noncompliant Waste Identified During Waste Confirmation	Added "and the Management and Operating Contractor and the DOE Carlsbad Field Office will be notified."	Ensure the completeness of the Renewal Application.
Figure C7-1 Overview of Waste Confirmation	Revised figure.	Ensure the accuracy of the Renewal Application.
	Attachment	D
	RCRA Contingend	cy Plan
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
Section D-1 Scope and Applicability	Clarified text to indicate that derived waste will be "managed as TRU mixed waste" and emplaced in the rooms in the HWDUs"	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section D-4a(2) Communication of Emergency Conditions to Facility Employees	Added text to clarify that if evacuation of underground personnel is required due to a power failure, a backup generator is available to power the hoisting equipment.	Ensure the completeness and accuracy of the Renewal Application.
Section D-4e(1) Fires	Clarified that water and dry chemical materials "in use at the WIPP facility" have been determined to be compatible with components of TRU mixed waste "and site-generated hazardous waste."	Ensure the completeness and accuracy of the Renewal Application.
Section D-4f(1) Management and Disposition of Released Material	Revised text by combining the first and second paragraphs.	Ensure accuracy and enhance the readability of the Renewal Application.
Section D-8a Surface Evacuation On-	Changed title of section to "Surface Evacuation On-site Assembly and Off-site Staging Areas."	Ensure the accuracy of the Renewal Application by creating consistency with the titles of Figures D-6 and D-6-NFB.
site Assembly and Off- site Staging Areas	Revised text to clarify that security officers remain at the "WIPP facility main gate," not the "primary staging area gate," 24 hours a day."	Ensure the accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
Section D-8b Underground Assembly Areas and Egress Hoist Stations	Revised text to clarify that decontamination of personnel will be conducted consistent with radiological control procedures pursuant to 10 CFR Part 835.	Ensure the completeness of the Renewal Application by citing the applicable standard for radiological control procedures.
Section D-8e Further Site Evacuation	Revised description primary evacuation routes for the WIPP facility: Louis Whitlock Road, which connects to U.S. Highway 62/180, and State Highway 128 via the South Access Road.	Ensure the accuracy of the Renewal Application.
Section D-9 Location of the <i>RCRA</i> <i>Contingency Plan</i> and Plan Revision	Added three additional agencies to the list of recipients for the <i>RCRA Contingency Plan</i> : Eddy County Fire Service, Eddy County Emergency Management and Lea County Emergency Management.	Ensure the completeness of the Renewal Application.
Table D-2	Plant Base Radios – Changed "transmitters" to "radio."	Ensure the accuracy of the Renewal Application.
Emergency Equipment Maintained at the Waste Isolation Pilot Plant	TDOP Upender – Revised text to clarify that the upender facilitates overpacking standard waste boxes into TDOPs.	Ensure the accuracy of the Renewal Application.
Figure D-1 WIPP Surface Structures	Updated figure to include the information from Figure D- 1a and Figure D-6.	Streamline the Renewal Application and ensure its accuracy and readability.
Figure D-1a Legend to Figure D-1	Moved information from this figure to Figure D-1.	Streamline the Renewal Application and ensure its accuracy and readability.
Figure D-1-NFB WIPP Surface Structures with Building 416	Updated figure to include the information from Figure D- 1a-NFB and Figure D-6-NFB.	Streamline the Renewal Application and ensure its accuracy and readability.
Figure D-1a-NFB Legend to Figure D-1- NFB (Building 416)	Moved information from this figure to Figure D-1-NFB.	Streamline the Renewal Application and ensure its accuracy and readability.
Figure D-3 WIPP Underground Facilities	Figure removed; the underground facility is depicted in Figure D-4. In addition, this figure is also depicted in Attachment M, Figure M-43.	Streamline the Renewal Application and ensure its accuracy and readability.
Figure D-4 Underground Escape and Evacuation Map	Renumbered figure from Figure D-4 to Figure D-3; updated text reference to figure, as appropriate.	Ensure the accuracy of the Renewal Application.
Figure D-5 Fire-Water Distribution System	Renumbered figure from Figure D-5 to Figure D-4; updated text reference to figure, as appropriate.	Ensure the accuracy of the Renewal Application.
Figure D-5-NFB Fire-Water Distribution	Renumbered figure from Figure D-5-NFB to Figure D-4- NFB; updated text reference to figure, as appropriate.	Ensure the accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
System with Building 416		
Figure D-6 WIPP On-Site Assembly Areas and Off-Site Staging Areas	Figure removed; this information is being moved to Figure D-1 with exception to the eye wash locations and the "E" symbol in the legend. Eyewash equipment locations are specifically described in Table D-2. The "E" designation in the legend was not used in the figure. Exit locations for the Waste Handling Building are depicted in Figures 6a through 6c. Change text references from Figure D-6 to Figure D-1.	Streamline the Renewal Application and ensure its accuracy and readability.
Figure D-6-NFB WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416	Figure removed; this information is being moved to Figure D-1-NFB with exception to the eye wash locations and the "E" symbol in the legend. Eyewash equipment locations are described specifically in Table D-2. The "E" designation in the legend was not used in the figure. Exit locations for the Waste Handling Building are depicted in Figures 6a through 6c. Change text references from Figure D-6-NFB to Figure D-1-NFB.	Streamline the Renewal Application and ensure its accuracy and readability.
Figure D-6a RH Bay Evacuation Routes	Renumbered figure from Figure D-6a to Figure D-5; updated text reference to figure, as appropriate.	Ensure the accuracy of the Renewal Application.
Figure D-6b RH Bay Hot Cell Evacuation Routes	Renumbered figure from Figure D-6b to Figure D-6; updated text reference to figure, as appropriate.	Ensure the accuracy of the Renewal Application.
Figure D-6c Evacuation Routes in the Waste Handling Building	Renumbered figure from Figure D-6c to Figure D-7; updated text reference to figure, as appropriate.	Ensure the accuracy of the Renewal Application.
Permit Figure D-7 Designated Underground Assembly Areas	Figure removed; the underground assembly areas are depicted on Figure D-3. Change text references from Figure D-7 to Figure D-3.	Streamline the Renewal Application and ensure its accuracy and readability.
	Attachment I	E
	Inspection Schedule, Proc	ess and Forms
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
Introduction	Revised the text identifying what Permit-specified facility inspections (including container inspections) are supposed to detect. Deleted "malfunctions,	Ensure the accuracy of the Renewal application by revising the text to more closely incorporate the regulatory language in 20.4.1.500 NMAC (incorporating 40 CFR §264.15(a)).

Renewal Application Section	Description of Change(s)	Discussion
	deterioration, operator errors, and discharges that may cause or lead to releases of hazardous waste or hazardous waste constituents to the environment or that could be a threat to human health". Replaced with " malfunctions and deterioration, operator errors, and discharges which may be causing—or may lead to—(1) release of hazardous waste constituents to the environment or (2) a threat to human health, in accordance with 20.4.1.500 New Mexico Administrative Code (NMAC) (incorporating 40 CFR §264.15a))".	
	Deleted "The equipment will be inspected for malfunctions, deterioration, potential for operator errors, and discharges which could lead to a release of hazardous waste constituents to the environment or pose a threat to human health".	Streamline the Renewal Application by removing redundancy, thereby enhancing its readability. The reasons for performing the Permit- specified inspections are identified in the preceding section, <i>Introduction</i> .
	Changed "necessary" to "used".	Ensure accuracy and enhance the readability of the Renewal Application.
	Changed "Operational" to "The Permittees maintain operational"	Ensure accuracy and enhance the readability of the Renewal Application.
Section E-1 Inspection Schedule	Deleted "in the Operating Record…"	Remove a requirement from the Renewal Application that does not support a Permit requirement and is not reflected in the New Mexico Hazardous Waste Regulations. The regulations require the records and results of inspections (i.e., completed inspection forms or logbooks), not the operational procedures themselves, to be maintained in the Operating Record.
	Deleted "The operational procedures are maintained at the WIPP Facility. Tables E-1 and E-1a summarize inspections, frequencies, responsible organizations, and the types of anticipated problems as well as the references for the operational procedures".	Streamline the Renewal Application and enhance its readability by removing duplicative text that is captured in the preceding paragraph.
	Deleted "The records maintained as the WIPP Records Archive are stored in facilities that are temperature and humidity controlled especially for the long term storage of records and readily retrievable and available for inspection".	Remove unnecessary detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations.
	Changed "data sheets" to "inspection forms."	Ensure the accuracy of the Renewal Application by creating consistency within Attachment E when referring to types of inspection records.

Renewal Application Section	Description of Change(s)	Discussion
	Added "or pre-evolution" to the identified type of inspection.	Ensure the completeness and accuracy of the Renewal Application.
	Deleted ", or in operational procedures."	Remove redundancy within the sentence, thereby streamlining and enhancing the readability of the Renewal Application.
	Added "or inspection form" to identify inspection results can be entered into a logbook or inspection form.	Ensure the accuracy of the Renewal Application by creating consistency with earlier text in same paragraph.
	Added "procurement action" as an action that may be taken to address an identified inspection deficiency, discrepancy, or needed repair.	Ensure the completeness and accuracy of the Renewal Application; a procurement action may be needed to be completed to correct/address an identified inspection issue.
	Deleted "(CHAMPS)," which is the name of current software system used for maintenance management, and lowercased "maintenance management tracking program."	Remove specificity of the automated maintenance management system used at the WIPP facility to ensure the accuracy of the Renewal Application. Should the Permittees decide to use another automated maintenance management system, a permit modification will not be necessary.
	Added "inspection form" as an additional document in which the compensatory measures may be specified.	Ensure the completeness and accuracy of the Renewal Application.
	Added "WIPP automated maintenance management tracking program" to replace "CHAMPS system"	Remove specificity of the automated maintenance management system used at the WIPP facility to ensure the accuracy of the Renewal Application. Should the Permittees decide to use another automated maintenance management system, a permit modification will not be necessary.
	Deleted "The schedule is discussed daily to ensure facility configuration can support scheduled" Deleted "items and to allocate" Added "with other facility activities"	Ensure the completeness and accuracy of the Renewal Application by combining two sentences pertaining work scheduling.
	Deleted "for normal operations to resume."	Ensure accuracy and enhance the readability of the Renewal Application; the text already indicates the equipment is returned to an operational status.
	Changed "Requirements" to "The Permittees meet the requirements"	Ensure the completeness and accuracy of the Renewal Application.
	Changed "maintained in the Operating Record" to "on file at the WIPP facility".	Remove a requirement from the Renewal Application that does not support a Permit requirement and is not reflected in the New Mexico Hazardous Waste Regulations. Per the regulations, the records and results of inspections (i.e., completed inspection forms or logbooks), not the current copies of inspection forms, are required to be maintained in the Operating Record.
	Added "to inspections" to "Non-administrative	Provide clarification, ensure accuracy, and enhance the readability of

Renewal Application Section	Description of Change(s)	Discussion
	changes" Changed "frequency or contact of inspections" to "frequency or content of inspection schedules." Deleted "to inspection forms"	the Renewal Application relative to the requirements of 40 CFR §270.42, Appendix I.
	Added "waste handling" to "equipment" to clarify which equipment is being addressed by the text.	Ensure accuracy and enhance the readability of the Renewal Application.
	Changed "maintained" to "recorded".	Ensure the completeness and accuracy of the Renewal Application by indicating that the status of waste handling equipment is recorded in an equipment logbook.
	Deleted "as the first activity in the inspection procedure" and replaced it with "regarding the status of the equipment."	Ensure the accuracy of the Renewal Application. For example, the first activity may be to identify the date of the inspection or the equipment identification number on the inspection checklist.
	Added the "TDOP Upender, and the Payload Transfer Station" to the identified list of CH TRU waste handling equipment controlled by a logbook.	Ensure the completeness and accuracy of the Renewal Application.
	Deleted "and radiation monitoring equipment will be"	Remove unnecessary detail from the Renewal Application that is not governed by the New Mexico Hazardous Waste Management Regulations. The radiation protection standards are established by the DOE, pursuant to 10 CFR Part 835, <i>Occupation Radiation Protection</i> for protecting individuals from ionizing radiation resulting from the conduct of DOE activities. Concerning radiation monitoring equipment, 10 CFR Part 835 requires that deployed radiation monitoring equipment is maintained and calibrated on an established frequency and routinely tested for operability.
	Revised text to clarify that preventive maintenance is performed according to manufacturers' instructions and/or DOE orders to reduce the likelihood of mechanical failure, but is not performed to meet the inspection requirements of 40 CFR §264.15(a).	Ensure the accuracy of the Renewal Application by creating consistency with the changes to Table E-1a relative to the removal of the preventive maintenance procedures.
	Updated the references cited. This resulted in deleting the WIPP Safety Analysis Report and identifying the more recent WIPP Documented Safety Analysis. This also resulted in deleting the WIPP Remote-Handled Waste Preliminary Safety Analysis Report (RH PSAR) reference.	Ensure the completeness and accuracy of the Renewal Application by removing obsolete references and replacing them with the appropriate current reference. The <i>WIPP Documented Safety Analysis</i> addresses the safety analysis of WIPP CH and RH waste operations. This includes the receipt, movement, and emplacement of CH and RH waste containers with mechanical equipment.
	Deleted "Equipment subject to failures that cannot practically be mitigated is retained for analysis and is the basis for contingency planning".	Ensure the accuracy of the Renewal Application. The <i>WIPP</i> <i>Documented Safety Analysis</i> documents the hazard analysis performed for the WIPP facility; this hazard analysis considers the potential for equipment failure and human error and identifies

Renewal Application Section	Description of Change(s)	Discussion
	Changed "maintained in the Operating Record" to "kept on file at the WIPP facility" concerning the location of the current inspection procedures.	preventive and mitigative controls to lessen risks. Remove a requirement from the Renewal Application that does not support a Permit requirement and is not reflected in the New Mexico Hazardous Waste Regulations. Per the regulations, the records and results of inspections (i.e., completed inspection forms or logbooks), not the inspection procedures themselves, are required to be maintained in the Operating Record.
	Deleted "An example equipment inspection checklist and a typical logbook form are shown as Figures E-1 and E-2".	Remove unnecessary detail from the Renewal Application that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations; Figures E-1 and E-2 are being removed.
	Deleted "Actual checklists or forms are maintained within the Operating Record".	Remove duplicative text, thereby streamlining the Renewal Application and enhancing its readability; this text was addressed earlier in this same paragraph.
	Deleted reference to Table E-2.	Ensure the accuracy of the Renewal Application. Table E-2 was deleted since the individual pieces of equipment/systems listed are already listed in Table E-1.
Section E-1a General Inspection Requirements	Deleted "a copy of which is maintained at the WIPP facility".	Remove redundancy, thereby streamlining the Renewal Application and enhancing its readability. Copies of inspection forms were previously addressed in Section E-1, Inspection Schedule.
	Deleted sentence pertaining to daily inspection of areas subject to spills and moved to Section E-1a(2), <i>Frequency of Inspections.</i>	Remove redundancy, thereby streamlining the Renewal Application and enhancing its readability.
Section E-1a(1) Types of Problems	Added "tubing" to enhance the example provided for visible cracks.	Ensure the completeness of the Renewal Application by enhancing the descriptive information provided as examples of the types of problems looked for during inspections.
	Deleted reference to Table E-2.	Ensure the accuracy of the Renewal Application. Table E-2 was deleted since the individual pieces of equipment/systems listed are already listed in Table E-1.
Section E-1a(2) Frequency of Inspections	Replaced "Areas subject to spills, such as loading and unloading areas, are inspected daily when in use, consistent with the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4))" with sentence from Section E-1a, "When in use, daily inspections are made of areas subject to spills, such as TRU mixed waste loading and unloading areas in the WHB Unit, and involve looking for deterioration in structures, mechanical items, floor coatings, equipment,	Remove redundancy, thereby streamlining the Renewal Application and enhancing its readability.

Renewal Application Section	Description of Change(s)	Discussion
	malfunctions, etc., in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4))."	
	Deleted "are shown in Table E-2 and"	Ensure the accuracy of the Renewal Application. Table E-2 was deleted since the individual pieces of equipment/systems listed are already listed in Table E-1.
Section E-1a(3) Monitoring Systems	Deleted "assure no," added "identify the development of," and deleted "are allowed to develop."	Clarify that the geomechanical monitoring system identifies the development of unsafe conditions, thereby ensuring the accuracy of the Renewal Application. This text, as written, implies the WIPP geomechanical monitoring system assures no unsafe conditions are allowed to develop.
	Removed "the fixed radiation monitoring equipment" from the listing of systems that are continuously statused by the CMR.	Ensure the accuracy of the Renewal Application by creating consistency with other changes within Attachment E where references to radiation monitoring equipment have been removed.
	Added "Key equipment monitored by these two systems are identified in Table E-1 and include a specified inspection frequency".	Ensure the completeness and accuracy of the Renewal Application by adding a reference to Table E-1 since the reference to Table E-2 has been removed.
	Added "Section 3.3.1 and Permit Attachment A1, Section A1-1b".	Ensure the completeness and accuracy of the Renewal Application by adding more specific Permit citations concerning information located in Permit Part 3.
	Deleted "Off-site waste that will be managed and stored as CH TRU mixed waste will arrive in 55-gallon drums arranged as seven (7)-packs, in Ten Drum Overpacks (TDOP), in 85-gallon drums arranged as four (4) packs, in 100-gallon drums arranged as three (3) packs, in standard waste boxes (SWB), in standard large box 2s (SLB2s) or shielded containers as (3)-packs".	Streamline the Renewal Application and enhance its readability by removing duplicative information. This information is addressed in Section A1-1b, <i>Description of Containers</i> , and Permit Part 3, Section 3.3.1.
Section E-1b(1) Container Inspection	Revised the sentence, "If CH TRUPACT-II mixed waste handling operations should stop for any reason with containers located on the TRUPACT-II Unloading Dock (TRUDOCK storage area of the WHB Unit) or in room 108 while still in the Contact-Handled Packages, primary waste container inspections could not be accomplished until the containers are removed from the shipping containers" to read, "If CH TRU mixed waste handling operations should stop for any reason with containers in the CH package (e.g., at the TRUDOCKs or in Room 108), primary waste container inspections cannot be accomplished until the containers of waste are removed from the CH package."	Ensure the completeness and accuracy of the Renewal Application. The original wording was more specific to TRUPACT-IIs. The text was revised to reference CH Packages to be inclusive of TRUPACT- IIs, HalfPACTs, and TRUPACT-IIIs.

Renewal Application Section	Description of Change(s)	Discussion
	Revised "off-site waste that will be managed and stored as RH TRU mixed waste will arrive in containers inside Nuclear Regulatory Commission (NRC)-certified casks designed to provide shielding and facilitate safe handling" to "off-site waste managed and stored as RH TRU mixed waste arrives in Nuclear Regulatory Commission-certified casks."	Streamline the Renewal Application and enhance its readability by removing duplicative descriptive detail that is covered in Attachment A1.
	Deleted "Canisters, will be loaded singly into an RH- TRU 72-B cask".	Streamline the Renewal Application and enhance its readability by removing duplicative information that is addressed in Section A1-1b, <i>Description of Containers</i> .
	Deleted "Drums will be loaded into a CNS 10-160B cask".	Streamline the Renewal Application and enhance its readability by removing duplicative information that is addressed in Section A1-1b, <i>Description of Containers</i> .
	Deleted "Because RH TRU mixed waste is stored in the Parking Area Unit in sealed casks, there are no additional requirements for engineered secondary containment systems".	Streamline the Renewal Application and enhance its readability by removing duplicative information. This information is addressed later in this section.
	Changed "Following removal of the canisters and drums" to "Following removal of the canisters or drums."	Ensure the accuracy of the Renewal Application.
	Deleted "As RH TRU mixed waste is held in canisters within a canister rack the physical inspection of the drum or canister is not possible".	Ensure the completeness and accuracy of the Renewal Application. The only time RH TRU mixed waste is stored in a "rack" is in the Hot Cell. At other times, the canister is in a 72B Cask, shielded insert, or Facility Cask. The next paragraph of this section contains a more detailed discussion concerning inspection of RH TRU mixed waste containers.
	Deleted "Because RH TRU mixed waste is in sealed casks, there are no additional requirements for engineered secondary containment systems".	Ensure the completeness and accuracy of the Renewal Application. In the Hot Cell, Transfer Cell, and the Facility Cask Loading Room, the RH TRU mixed waste is not stored in a sealed cask. The next sentence addresses mitigative controls and identifies the floors in the RH Complex are coated concrete and during normal operations (i.e., when waste is present), the floor is of the RH Complex is inspected visually or by using close-circuit cameras on a weekly basis to verify that it is in good condition and free of visible cracks and gaps. Secondary containment is provided by the concrete floors themselves, not the coating on the floors; however, the coating must be compatible with TRU mixed waste, which renders the coating impervious to any chemicals present in the waste.
	Added "and focus on the inventory and integrity of the shipping containers and the spacing between trailers	Ensure the completeness and accuracy of the Renewal Application. More detail has been added concerning the waste container

Renewal Application Section	Description of Change(s)	Discussion
	carrying the CH or RH packages. This aisle spacing is maintained at a minimum of four feet". Deleted "The perimeter fence located at the lateral limit of the Parking Area Unit, coupled with personnel access restrictions into the WHB Unit, will provide the needed security. The perimeter fence and the southern border	inspections conducted in the Parking Area Unit and the specification of a minimum aisle spacing of four feet between the transport trailers. Streamline the Renewal Application and enhance its readability by removing duplicative information; the description of the Parking Area Unit is provided in Attachment A, <i>General Facility Description and</i> <i>Process Information</i> .
	of the WHB shall mark the lateral limit of the Parking Area Unit". Deleted "Radiologically controlled areas can be established temporarily with barricades. More permanent structures can be installed. The western boundary can be established with temporary barricades since this area is within the perimeter fence".	Remove unnecessary detail that is not needed to support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. This information is not pertinent to the description of inspections in the PAU; furthermore, the radiation protection standards (including establishing and posting controlled areas) are governed by the DOE, pursuant to 10 CFR Part 835, <i>Occupation</i>
	Deleted "Access to radiologically controlled areas will only be permitted to personnel who have completed General Employee Radiological Training (GERT), a program defined by the Permittees, or escorted by personnel who have completed GERT. This program ensures that personnel have adequate knowledge to understand radiological posting they may encounter at the WIPP site".	Radiation Protection. Remove unnecessary detail that is not needed to support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations. This information is not pertinent to the description of inspections in the PAU; furthermore, the radiation protection standards are governed by the DOE, pursuant to 10 CFR Part 835, <i>Occupation Radiation Protection</i> . This includes establishing radiation safety training requirements for access to controlled areas and before receiving occupational dose during access to controlled areas at a DOE site or facility.
	Deleted "The fence of the Radiologically Controlled Area, south from the WHB airlocks, was moved to provide more maneuvering space for the trucks delivering waste".	Remove outdated information that is longer relevant to the Permit. This information is not pertinent to the description of inspections in the PAU.
	Deleted "Inspections of the Contact-Handled and Remote-Handled Packages stored in the Parking Area Unit shall be conducted at a frequency no less than once weekly and will focus on the inventory and integrity of the shipping containers and the spacing between trailers carrying the Contact-Handled or Remote- Handled Packages. This spacing will be maintained at a minimum of four feet".	Streamline the Renewal Application and enhance its readability; the deleted text has been moved to earlier location in the paragraph and combined with the first sentence.
	Deleted "(i.e., Parking Area Unit and WHB unit)" Text already identifies it is addressing inspections of the surface TRU mixed waste handling areas described in	Remove redundant text, thereby streamlining the Renewal Application and enhancing its readability.

Renewal Application Section	Description of Change(s)	Discussion
	Tables E-1 and E-1a.	
	Deleted "The Derived Waste Storage Areas will consist of containers for 55 or 85-gallon drums or SWBs for CH TRU mixed waste and 55-gallon drums for RH TRU mixed waste". Added "inspection" to clarify which requirements	Remove redundant text, thereby streamlining the Renewal Application and enhancing its readability. Permit Part 3 Section 3.3.2, <i>Derived</i> <i>Waste Containers</i> already identifies the containers used for the collection, storage, and disposal of derived waste. Ensure the completeness and accuracy of the Renewal Application.
	are being discussed.	
Section E-1b(2)	Combined sentences pertaining to the inspection frequencies for geomechanical monitoring equipment and the monitoring schedule for geomechanical instrumentation to read, "Inspection of the geomechanical instrumentation system is addressed in Table E-1." Changed "Table E-2" to "Table E- 1" to identify where the monitoring schedule for geomechanical instrumentation is provided.	Streamline the Renewal Application and enhance its readability by removing redundancy. Table E-2 has been deleted from the Renewal Application; however, the inspection requirements for the geomechanical instrumentation were already identified in Table E-1.
Miscellaneous Unit Inspection	Added "As identified in Permit Attachment A2, Section A2-b(2), The geomechanical monitoring program at the WIPP facility is an integral part of the ground-control program. Hazardous waste disposal units, HWDUs access drifts, the Waste Shaft Station and the Underground transport route are monitored to provide confirmation of structural integrity. Geomechanical data on the performance of the repository shafts is collected as part of the shaft inspections. The results of the geotechnical investigations are reported annually as identified in Permit Attachment A2, Section A2-b(2).	Ensure the completeness and accuracy of the Renewal Application by adding text to provide more information about the geomechanical monitoring program at the WIPP facility.
References	Changed the "DOE, 1999. "WIPP Safety Analysis Report," DOE/WIPP-95-20165" to the reference citation "DOE/WIPP-3372, Waste Isolation Pilot Plant Documented Safety Analysis".	Ensure the completeness and accuracy of the Renewal Application by removing an outdated reference and replacing it with the current appropriate reference. The <i>WIPP Documented Safety Analysis</i> addresses the safety analysis of WIPP CH and RH waste operations. This includes the receipt, movement, and emplacement of CH and RH waste containers with mechanical equipment.
	Deleted the reference citation "DOE, 2000. "WIPP Remote-Handled Waste Preliminary Safety Analysis (RH PSAR)"".	Ensure the accuracy of the Renewal Application by removing an outdated reference. The <i>WIPP Documented Safety Analysis</i> addresses the safety analysis of WIPP CH and RH waste operations. This includes the receipt, movement, and emplacement of CH and RH waste containers with mechanical equipment.
Permit Figure E-1 Typical Inspection	Deleted Figure E-1.	Remove unnecessary detail that is not needed to support a Permit requirement and is not required by the New Mexico Hazardous Waste

Renewal Application Section	Description of Change(s)	Discussion
Checklist		Regulations.
Permit Figure E-2 Typical Logbook Entry	Deleted Figure E-2.	Remove unnecessary detail that is not needed to support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations.
	In the Responsible Organization column, changed "Waste Handling" to "Waste Operations".	Ensure the accuracy of the Renewal Application.
	The inspection frequency was changed from "Preoperational" to "Pre-evolution" for the following five pieces of waste-handling equipment: Facility Transfer Vehicle, TDOP Upender, Yard Transfer Vehicle, Payload Transfer Station, and Monorail Hoist.	For rationale concerning this change, see the "Proposed Table E-1 CH Waste Handling Equipment Inspection Frequency Change" see interoffice correspondence dated November 11, 2019, which reviews the rationale and benefits of changing the "preoperational" inspection to a "pre-evolution" inspection for some CH mixed waste handling equipment listed in Table E-1. ²
	For the five pieces of CH waste handling equipment where the inspection frequency has been changed from "Preoperational" to "Pre-evolution," added text to the Inspection Criteria column to include "Pre-evolution Checks and Operating Instructions."	Ensure the completeness of the Renewal Application. Text was added to ensure the specified operational procedures include a pre-evolution check and they contains operating instructions for the piece of equipment. This is similar to the existing approach utilized in Table E- 1a for RH equipment with a specified inspection frequency of "pre- evolution."
Table E-1 Inspection Schedule/Procedures	For the five pieces of CH waste handling equipment where the inspection frequency has been changed from "Preoperational" to "Pre-evolution," footnote "p" was superscripted in the Inspection Frequency column. Footnote "p" was added to the footnotes of Table E-1 and describes a "Pre-evolution" event and inspection.	Ensure the completeness of the Renewal Application. Footnote "p" was added to Table E-1 to differentiate between a "Preoperational" and "Pre-evolution" inspection. Footnote "p" also describes when the evolution begins and ends.
	Backup Power Supply Diesel Generators – Added more specificity concerning the inspection results by replacing "logged in accordance with WP 04-AD3008" with "recorded on EA04AD3008-47-0" which is specified in WP 04-AD3008.	Ensure the completeness and accuracy of the Renewal Application; added more specificity concerning the inspection results, identifying they are recorded on EA04AD3008-47-0.
	Contact-Handled (CH) TRU Underground Transporter – Added the WP 05-WH1604 procedure which addresses two underground CH waste transporters. Added inspection criteria to ensure the transporter has an on- board automatic fire suppression system.	Ensure the completeness and accuracy of the Renewal Application.
	Exhaust Shaft – Removed inspection criteria of	Remove unnecessary specificity from the Renewal Application that is

² Nuclear Waste Partnership LLC. (2019, November 11). Proposed Table E-1 CH Waste Handling Equipment Inspection Frequency Change. Carlsbad, New Mexico.

Renewal Application Section	Description of Change(s)	Discussion
	"leaks/spills" from the inspection criteria.	not required by the New Mexico Hazardous Waste Regulations. Since there is no hazardous waste managed within or around the exhaust shaft, the "leaks/spills" inspection criteria is not relevant.
	Eye Wash and Shower Equipment – Revised the listed Responsible Organization from "Equipment Custodian" to "Environmental, Safety, Industrial Health."	Ensure the completeness and accuracy of the Renewal Application.
	Electric Forklifts Used for Waste Handling – In the current Permit there is one line item for forklifts (both electric and diesel) used for waste handling. For the Renewal Application, a separate line item has been created for the electric forklifts. The procedures utilized for electric forklift preoperational inspections were identified. The inspection criteria for the electric forklifts matches the inspection criterial in the current Permit.	Ensure accuracy and enhance the readability of the Renewal Application.
	Diesel Forklifts Used for Waste Handling – In the current Permit there is one line item for forklifts (both electric and diesel) used for waste handling. For the Renewal Application, a separate line item has been created for the diesel forklifts. The procedures utilized for diesel forklift preoperational inspections were identified. The inspection criteria for the diesel forklifts matches the inspection criterial in the current Permit.	Ensure the completeness and accuracy of the Renewal Application.
	Forklifts Used for Waste Handling (Electric and Diesel forklifts, Push-Pull Attachment) – In the current Permit the push-pull attachments are identified twice. First with the forklifts and again as a separate line item. For the Renewal Application, the push-pull attachments have been eliminated from the forklifts line item. The procedure pertinent to push-pull attachments (WP 05- WH1405) has been moved to the separate line item for push-pull attachments.	Ensure the completeness and accuracy of the Renewal Application.
	Hazardous Material Response Equipment – The inspection frequency was changed from "Quarterly" to "Monthly."	Ensure the completeness and accuracy of the Renewal Application. More frequent inspections of the hazardous material response equipment will aid in assuring its proper operation in time of an emergency.
	Perimeter Fence, Gates, Signs – Changed "Posted Warnings" to "Required Permit Part 2, Section 2.6.4 warning signs." This change adds more specificity concerning which warning signs are to be posted.	Ensure the completeness and accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
	Surface TRU Mixed Waste Handling Area – Added "CH" to the identified equipment/system in this line item. This line item is specific to CH. Table E-1a addresses the Surface RH TRU Mixed Waste Handling Area inspections.	Ensure the completeness and accuracy of the Renewal Application.
	Surface TRU Mixed Waste Handling Area – Changed "Posted Warnings" to "Required Permit Part 2, Section 2.6.4 warning signs." This change adds more specificity concerning which warning signs are to be posted.	Ensure the completeness and accuracy of the Renewal Application.
	Surface TRU Mixed Waste Handling Area – Added footnote "q" as a superscript to "Required Aisle Space" to add more specificity to the inspection criteria.	Ensure the completeness and accuracy of the Renewal Application. Footnote "q" consolidates aisle spacing requirements identified in the Renewal Application.
	Underground TRU Mixed Waste Disposal Area – Removed "equipment" from the listed inspection criteria. Waste handling equipment used in the underground is already listed in Table E-1 with a specified inspection frequency.	Ensure the completeness and accuracy of the Renewal Application.
	Underground TRU Mixed Waste Disposal Area – Added more specificity to "signs" by adding "required Permit Part 2, Section 2.6.4 warning". This change adds more specificity concerning which warning signs are to be posted.	Ensure the completeness and accuracy of the Renewal Application.
	Uninterruptible Power Supply (Central UPS) – Added more specificity concerning the inspection form that the daily inspections are recorded on. Removed "are logged in accordance with WP 04-AD3008" and added "recorded on EA04AD3008-2-0" which is specified by WP 04-AD3008.	Ensure the completeness and accuracy of the Renewal Application.
	Water Tanks – Added more specificity concerning the inspection form that the daily inspections are recorded on. Removed "are logged in accordance with WP 04-AD3008" and added "recorded on EA04AD3008-12-0 and EA04AD3008-13-0" which are specified by WP 04-AD3008.	Ensure the completeness and accuracy of the Renewal Application.
	Push-Attachment – Added procedure WP 05-WH1412 from the "Forklifts Used for Waste Handling" line item. Added "Mechanical Operability" along with the superscript footnote "m" to the inspection criteria.	Ensure the completeness and accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
	Closure Bulkheads – Removed PM000015 since the four closure bulkheads are being inspected by PM000011 which is identified in this line item.	Ensure the completeness and accuracy of the Renewal Application.
	Removed "and PMs" from footnote "h."	Ensure the accuracy of the Renewal Application by creating consistency with other changes to Attachment E pertaining to preventative maintenance.
Table E-1 Inspection/Procedures Notes	Added footnote "p". It identifies that "Pre-evolution" signifies that inspections are required prior to equipment use in the waste handling process. A TRUPACT-III shipment evolution is considered to be the process that begins with placing a loaded TRUPACT-III package on the Yard Transfer Vehicle (YTV) in the PAU, includes waste storage in the WHB Unit, and ends when the empty TRUPACT-III is removed from the YTV in the PAU. Additionally, a TDOP-Upender evolution is considered to be the process that begins with the empty TDOP placed on the Upender, and ends with storage of the overpacked waste container in the WHB Unit.	Ensure the completeness and accuracy of the Renewal Application. Footnote "p" was added to differentiate between a "Preoperational" and "Pre-evolution" inspection. Footnote "p" also describes when the evolution begins and ends.
	Added footnote "q". It identifies that in the PAU, the aisle spacing between trailers carrying the CH or RH packages are maintained at a minimum of four feet. In the CH Bay Storage Area of the WHB Unit, a minimum aisle space of 44 inches between loaded facility pallets is maintained. Also, in the CH Bay, a minimum aisle space of 44 inches is maintained between the walls of the CH Bay and a loaded facility pallet.	Footnote "q" consolidates aisle spacing requirements identified in the Renewal Application.
Table E-1a RH TRU Mixed Waste Inspection Schedule/Procedures	Removed the Preventive Maintenance procedures in Table E-1a. The WIPP procedures that implement the specified "Preoperational" or "Pre-evolution" inspections remain identified in Table E-1a. Removed the inspection frequency and inspection criteria specified by Permit for the PM procedures. The PM inspections include more in-depth inspections of mechanical systems, load testing of lifting systems, calibration of measurement equipment, and other actions as recommended by the equipment manufacturer or as required by DOE Orders.	Remove detail from the Renewal Application that is not required by the general inspection requirements of NMAC 20.4.1.500 (incorporating 40 CFR §264.15). While the Preventive Maintenance procedures are not being included in the Renewal Application, the PMs will still be performed to meet the preventive maintenance actions required by the manufacturer and/or DOE Orders. This is the same approach as currently utilized in Table E-1 for CH TRU mixed waste handling equipment. The specified procedures that implement "preoperational" or "pre-evolution" inspections are conducted prior to initiation of work activities involving the specified equipment to detect malfunctions and deterioration, operator errors, and discharges which may be causing or may lead to a release of hazardous waste constituents to the environment or a threat to human health. For

Renewal Application Section	Description of Change(s)	Discussion
		rationale concerning this change, see the "Preventative Maintenance Procedures in Permit Attachment E, Table E-1a for RH TRU Mixed Waste Handling Equipment" interoffice correspondence dated December 16, 2019 ³ .
	Facility Cask – Changed the Leaks/spills inspection criteria from "NA" to "Yes." The Facility Cask is not a sealed cask like the 72B Cask.	Ensure the completeness and accuracy of the Renewal Application.
	Transfer Cell Shuttle Car – Removed discrepant information between the specified inspection frequency (Pre-evolution) and the inspection criteria which specified both "Pre-evolution Pre-operational" checks. Removed "Pre-operational".	Ensure the completeness and accuracy of the Renewal Application.
	Cask Unloading Room – Removed the requirement to inspect the floor integrity of the Cask Unloading Room as it is part of the Surface RH TRU Mixed Waste Handling Area inspections, which is addressed later in Table E-1a.	Streamline the Renewal Application and enhance its readability. This approach is similar to the approach utilized in Table E-1 which does not individually break down separate areas from the Surface CH TRU Mixed Waste Handling Area inspections. No Permit conditions are being removed or revised by eliminating this line item.
	Hot Cell – Removed the requirement to inspect the floor integrity of the Hot Cell as it is part of the Surface RH TRU Mixed Waste Handling Area inspections, which is addressed later in Table E-1a.	Streamline the Renewal Application and enhance its readability. This approach is similar to the approach utilized in Table E-1 which does not individually break down separate areas from the Surface CH TRU Mixed Waste Handling Area inspections. No Permit conditions are being removed or revised by eliminating this line item.
	Transfer Cell – Removed the requirement to inspect the floor integrity of the Transfer Cell as it is part of the Surface RH TRU Mixed Waste Handling Area inspections, which is addressed later in Table E-1a.	Streamline the Renewal Application and enhance its readability. This approach is similar to the approach utilized in Table E-1 which does not individually break down separate areas from the Surface CH TRU Mixed Waste Handling Area inspections. No Permit conditions are being removed or revised by eliminating this line item.
	Facility Cask Loading Room – Removed the requirement to inspect the floor integrity of the Facility Cask Loading Room as it is part of the Surface RH TRU Mixed Waste Handling Area inspections, which is addressed later in Table E-1a.	Streamline the Renewal Application and enhance its readability. This approach is similar to the approach utilized in Table E-1 which does not individually break down separate areas from the Surface CH TRU Mixed Waste Handling Area inspections. No Permit conditions are being removed or revised by eliminating this line item.
	Radiation Monitoring Equipment – Removed the inspection of the listed radiation monitoring equipment	Ensure the accuracy of the Renewal Application by creating consistency with other changes within Attachment E where references

³ Nuclear Waste Partnership LLC. (2019, December 16). Preventive Maintenance Procedures in Permit Attachment E, Table E-1a for RH TRU Mixed Waste Handling Equipment. Carlsbad, New Mexico.

Renewal Application Section	Description of Change(s)	Discussion
	in Table E-1a.	to radiation monitoring equipment have been removed. The radiation protection standards are established by the DOE, pursuant to 10 CFR Part 835, <i>Occupation Radiation Protection</i> for protecting individuals from ionizing radiation resulting from the conduct of DOE activities. Concerning radiation monitoring equipment, 10 CRF Part 835 requires that deployed radiation monitoring equipment be maintained and calibrated on an established frequency and routinely tested for operability.
	Horizontal Emplacement and Retrieval Equipment or functionally equivalent equipment – Replaced the specified equipment "Horizontal Emplacement and Retrieval Equipment" with "Horizontal Emplacement Machine".	Ensure the completeness and accuracy of the Renewal Application. The Horizontal Emplacement and Retrieval Equipment was abandoned in place in Room 6, Panel 7. It is anticipated that it will be replaced with the "Horizontal Emplacement Machine" or a functionally equivalent piece of equipment. The specified pre-evolution inspection was not changed.
	Horizontal Emplacement and Retrieval Equipment or functionally equivalent equipment– Removed the procedure number WP 05-WH1700 which has been deactivated due to the abandonment of the Horizontal Emplacement and Retrieval Equipment. Replaced with procedure number WP 05-WH1733 and text was added to indicate this procedure is currently not active, but has been designated for the Horizontal Emplacement Machine when activities are initiated to support resumption of RH waste emplacement.	Ensure the completeness and accuracy of the Renewal Application.
	41-Ton Forklift – Added an additional inspection criteria for an on-board automatic fire suppression system.	Ensure the completeness and accuracy of the Renewal Application.
	RH Bay – Removed the requirement to inspect the floor integrity of the RH Bay as it is part of the Surface RH TRU Mixed Waste Handling Area inspections, which is addressed later in Table E-1a.	Streamline the Renewal Application and enhance its readability. This approach is similar to the approach utilized in Table E-1 which does not individually break down separate areas from the Surface CH TRU Mixed Waste Handling Area inspections. No Permit conditions are being removed or revised by eliminating this line item.
	Surface RH TRU Mixed Waste Handling Area – Changed "Posted Warning" to "Required Permit Part 2, Section 2.6.4 warning signs". This change adds more specificity concerning which warning signs are to be posted. Changed "Communication" inspection criteria to "Communication Systems".	Ensure the completeness and accuracy of the Renewal Application.
	Surface RH TRU Mixed Waste Handling Area – Added additional inspection criteria of Deterioration,	Ensure the completeness and accuracy of the Renewal Application. These additional inspection criteria are consistent with the inspection

Renewal Application Section	Description of Change(s)	Discussion
	Leaks/Spills, Required Aisle Space, Container Condition, and Floor coating integrity.	criteria specified in Table E-1 for the Surface CH TRU Mixed Waste Handling Area.
	Surface RH TRU Mixed Waste Handling Area – For the newly specified inspection criteria of "Required Aisle Space" a superscript footnote "m" was added. Footnote "m" (discussed below) specifies aisle spacing requirements in the RH Complex.	Ensure the completeness and accuracy of the Renewal Application.
	Revised footnote "c" for the description of a "Pre- evolution" inspection. Much of the current description is actually pertaining to a preoperational inspection. This text was moved to footnote "i" which describes a "Preoperational" inspection.	Ensure the completeness and accuracy of the Renewal Application.
	Revised the remaining footnote "c" description that defines an "evolution". Changed "from" to "the process that begins with"	Ensure the completeness and accuracy of the Renewal Application.
Table E-1a RH TRU Mixed Waste Inspection	Revised footnote "i" to add the text moved from footnote "c". These preoperational inspection criteria more appropriately reside in footnote "i".	Ensure the completeness and accuracy of the Renewal Application.
Schedule/Procedure Notes	Removed "and PMs" from footnote "I."	Ensure the accuracy of the Renewal Application by creating consistency with other changes to Attachment E pertaining to preventative maintenance.
	Added footnote "m" to specify the minimum aisle space of 44 inches is maintained between loaded casks in the RH Bay of the WHB Units. Added additional requirement for other locations within the RH Complex that sufficient aisle space is maintained to assure that emergency equipment can be accessed or moved to the necessary locations.	Ensure the completeness and accuracy of the Renewal Application.
Table E-2 Monitoring Schedule	Deleted Table E-2 since the individual pieces of equipment and listed systems are specified in Table E- 1. The Table E-2 specified inspection frequencies for the listed equipment/systems match those listed in Table E-1. For the Central Monitoring System listed in Table E-2, the Ventilation Exhaust System was removed from Table E-1 by an earlier Permit modification. Also, the Meteorological Data System and the compressors are identified as "Not RCRA equipment".	Ensure the completeness and accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
	Attachment Facility Personnel Permit T	
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
Section F-0 Introduction	Changed "Employees" to "Facility employees".	Ensure accuracy and enhance the readability of the Renewal Application.
Section F-1 Outline of the Facility Personnel Permit Training Program	Changed "Table F-1 presents the personnel with identified responsibilities" to "Table F-1 identifies the jobs at the WIPP facility that include responsibilities"	Ensure accuracy and enhance the readability of the Renewal Application.
Section F-1a Facility Personnel Permit	Added "personnel" to clarify "WIPP facility". Text now identifies "WIPP facility personnel".	Ensure the completeness and accuracy of the Renewal Application.
Training Program Design	Added "computer-based" for more specificity for "training".	Ensure the completeness and accuracy of the Renewal Application.
	To add specificity, changed "relevant" to "Permit- specified".	Ensure accuracy and enhance the readability of the Renewal Application.
	Deleted "(although some emergency response training may require longer time periods to complete certifications)".	Ensure the accuracy of the Renewal Application. This parenthetical is true for some WIPP facility job positions that require certifications; however, the Permit-specified training courses are completed within the time frames identified in the Renewal Application. Therefore, this provision is no longer needed.
Section F-1(b)(2) Training Frequency	Added "Annual refresher training is required for each Permit course".	Ensure the completeness of the Renewal Application. The WIPP facility has established that each Permit-specified training course has an annual refresher training periodicity to clarify compliance with Permit Part 2, Section 2.8.4, <i>Continuing Training</i> .
	Changed "required" to "Permit-required".	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Added "In cases where an employee's annual refresher training has lapsed, that employee cannot work unsupervised until the initial training has been repeated".	Ensure completeness of the Renewal Application. This requirement was added to ensure that annual refresher training is completed in a timely manner to maintain compliance with Permit Part 2, Section 2.8.4, <i>Continuing Training</i> .
Section E $1(h)/2$	Added "computer-based training" to the identified instructional techniques used at the WIPP facility.	Ensure the completeness and accuracy of the Renewal Application.
Section F-1(b)(3) Training Techniques	Added "or his/her designee".	Ensure the accuracy of the Renewal Application by providing more flexibility to the Environmental Compliance Manager for approval of training exceptions/equivalences.

Renewal Application Section	Description of Change(s)	Discussion
Section F-1(c) Technical Training Manager (RCRA Training Director)	Added "(RCRA Training Director)" to the title of this Section.	Ensure the completeness and accuracy of the Renewal Application. This section allows the Technical Training Manager to delegate the responsibility of directing the Permit Attachment F, Facility Personnel Permit Training Program to a designee. At the WIPP facility, this responsibility has been delegated to the RCRA Training Director.
	Added "is operated in".	Ensure the completeness and accuracy of the Renewal Application.
	Changed "indicated" to "Permit-indicated".	Provide clarification that this text is specific to Permit-required training requirements.
Section F-2 Implementation of	Added "Per the WIPP Training Program, annual Permit refresher training is to be completed within 30 calendar days of an employee's training anniversary date".	Ensure completeness of the Renewal Application by adding this requirement to ensure that annual refresher training is completed in a timely manner to maintain compliance with Permit Part 2, Section 2.8.4, <i>Continuing Training</i> .
Facility Personnel Permit Training Program	Added "If an employee's annual refresher training has lapsed, they do not work unsupervised in TRU mixed waste management or emergency response positions until they have successfully repeated the Permit- required initial training".	Ensure completeness of the Renewal Application by adding this requirement to ensure that annual refresher training is completed in a timely manner to maintain compliance with Permit Part 2, Section 2.8.4, <i>Continuing Training</i> .
Section F-3	Removed the revision number and date from the	Ensure accuracy of the Renewal Application.
References	identified references.	
	Attachment Closure Pla	
	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
	Figure references changed throughout to correspond with figure numbers in Attachment M, <i>Figures</i> . Changed "panel" to "HWDU" throughout, with the	Ensure the accuracy of the Renewal Application; Figures in Attachment G have been consolidated into Attachment M, <i>Figures</i> . Ensure accuracy and enhance the readability of the Renewal
General	exception of references to panel closure. Changed "35 year operational" to "Disposal Phase" throughout Attachment G.	Application. The 35-year operational phase is an obsolete concept since waste management operations began in 1999 and the life of the facility will have to be extended in order to accommodate existing and future TRU mixed waste. Furthermore, the three-year hiatus to recover from the 2014 radiological release incident, and the resulting impact on throughput due to limited ventilation in the facility, has further exacerbated the need to extend the Disposal Phase beyond 35 years. As a result, no specific year for final facility closure is referenced in the Renewal Application since a final waste emplacement date is

Renewal Application Section	Description of Change(s)	Discussion
		unknown at this time. The Permittees have satisfied the closure schedule requirements by showing closure activities and durations in Table G-2 without specifying a year for the onset of final facility closure. Unless the Permittees are successful in obtaining authorization for more disposal panels in the future, the final facility closure date would be tied to the Panel 10 fill date of September 2030.
Introduction	Added the following paragraph: "This Closure Plan uses the terms Disposal Phase, facility closure period, and post-closure care period. The Disposal Phase began with the first waste emplacement in March 1999 and extends until the facility reaches its maximum waste capacity as defined in Section G-1c. The facility closure period is the 10-year period that begins once the final waste has been emplaced in the underground. The post-closure care period extends for 30-years after completion of facility closure period."	Ensure the completeness and accuracy of the Renewal Application. This paragraph defines the key terms in the Closure Plan and establishes that the closure date is tied to the capacity limit in Section G-1c.
	Deleted "and equipment that can sent off site."	Remove an unnecessary requirement from the Renewal Application. This text is being deleted because the disposition of decontaminated equipment is not a concern of the Permit or the New Mexico Hazardous Waste Management Regulations and is left to the judgement of the DOE.
Section G-1 Closure Plan	Revised text to indicate that surface and subsurface facilities and equipment will be decontaminated, if necessary, and removed and dispositioned appropriately or, alternatively, disposed in the last open underground HWDU as derived waste.	Ensure completeness and accuracy of the Renewal Application. This text is being revised because disposition of decontaminated equipment is not a concern of the Permit or the New Mexico Hazardous Waste Management Regulations and is left to the judgement of the DOE. The revised statement allows disposition of contaminated equipment to be in last HWDU in lieu of decontamination.
Section G-1a(1) Container Storage Units	Added new sentence, "Hazardous waste decontamination, if needed, will be conducted in accordance with the requirements of the Permit and the standards in 20.4.1.500 NMAC (incorporating 40 CFR Part 264)."	Ensure the completeness of the Renewal Application by providing the decontamination standard for hazardous waste.
	Removed, "The facility is expected to require no decontamination at closure because any waste spilled or released during operations will be contained and removed immediately."	Remove unnecessary detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Regulations.
	Delete "decontaminated and" from sentence.	Remove unnecessary detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste

Renewal Application Section	Description of Change(s)	Discussion
		Regulations. Container units may not need decontamination. Furthermore, certification as clean implies that decontamination has taken place.
	Revised sentence to indicate that facilities and equipment in the container storage units will be available for other purposes.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Added new sentence, "If portions of the facilities or equipment in these units, which require decontamination, cannot be decontaminated, these portions will be removed, and the resultant wastes will be managed consistent with radiological control procedures pursuant to 10 CFR Part 835."	Ensure completeness of the Renewal Application. This change adds flexibility to manage this waste as derived waste, low-level waste, low- level mixed waste, non-mixed hazardous waste, or non-hazardous solid waste, which is needed to assure decisions made with regard to waste management are in accordance with the applicable standard.
Section G-1a(2) Miscellaneous Unit	Deleted the phrase "when the underground HWDU and related equipment and structures have been decontaminated (if necessary)."	Ensure the accuracy of the Renewal Application. This language implies that underground disposal units will be decontaminated. This is not the case. Disposal units will be, by definition, contaminated by the waste disposed within them. Those underground items that will be subject to decontamination are defined in Section G-1d(2).
Section G-1a(3)	Revised text to indicate that the "regulatory agency" is the "NMED."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Post-Closure Care	Revised text to indicate that the "post-closure period" is the "post-closure care period."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Deleted "mixed" from "remote-handled (RH) TRU mixed waste." Changed "685,100 ft ³ (19,400 m ³) of TRU mixed waste per panel is used. This equates to 662,150 ft ³ (18,750	Ensure the accuracy of the Renewal Application. The text is quoting the statute which does not include the term "mixed." Streamline text and establish a stronger correlation between Permit Attachment G and Permit Part 4 by changing the reference to the
Section G-1c Maximum Waste Inventory	m3) of contact-handled (CH) TRU mixed waste and 22,950 ft ³ (650 m ³) of RH TRU mixed waste per panel." to read as follows: "TRU mixed waste per HWDU is listed in Permit Part 4, Table 4.1.1."	volumes in a panel to the volumes specified in Permit Part 4, Table 4.1.1. The amount of TRU mixed waste in a panel varies based on a number of factors including container size and void space. The allowable volume will be specified in Table 4.1.1 before disposal is initiated in a new panel.
	Changed paragraph to read as follows: "The maximum extent of operations during the term of this permit includes Panels 1 through 8, Panel 10, and proposed additional panels as discussed in Renewal Application Addendum G1 (DOE, 2020); the WHB Container Storage Unit; and the PAU. Note that Panel 9 will not be	Ensure the completeness and accuracy of the Renewal Application. This change clarifies that Panel 9 will not be used for TRU mixed waste disposal, Panel 10 is not authorized for waste emplacement under this permit, and construction of Panels beyond Panel 10 is not authorized under this Permit.

Renewal Application Section	Description of Change(s)	Discussion
	used for TRU mixed waste disposal and Panel 10 is not authorized for waste emplacement under this permit. Construction of HWDUs beyond Panel 10 is not authorized under this Permit, however if other waste management units are permitted during the Disposal Phase, this Closure Plan will be revised to include the additional waste management units. The design basis for a panel assumes that it takes about 30 months to fill the HWDU and initiate panel closure (DOE, 1997). However, it is anticipated that Panel 7, Panel 8, and Panel 10 (if authorized in the future for TRU mixed waste disposal) will take longer than 30 months to fill due the reduction in available ventilation capability, the ground conditions in Panel 10 and associated remediation efforts, and radiological contamination in Panel 10. These assumptions have been used in preparing the closure schedule in Table G-1. At any given time during disposal operations, it is possible that multiple rooms may be receiving TRU mixed waste for disposal at the same time. Underground HWDUs in which disposal has been completed (i.e., in which CH and RH TRU mixed waste emplacement activities have ceased) will undergo panel closure."	This change adds a reference to the original Part B Application which used the following design parameters for each HWDU: "Additional HWDUs will be needed every five years or less. This includes about 30-months to construct and prepare a HWDU to receive TRU mixed waste and about 30-months to fill the HWDU and initiate Panel Closure." (DOE 1997). Additionally, the filling of Panels 7, 8, and 10 will likely go beyond the 30-month timeframe due to constraints posed by reduced ventilation, deteriorated ground conditions, and radiological contamination. These assumptions are used in determining the panel closure schedule in Table G-1. This change also clarifies that the addition of future panels will be accompanied with a modification of the Closure Plan.
Section G-1d Schedule for Closure	Revised text to read, "For the purpose of establishing a schedule for closure, the final waste disposal will mark the end of the Disposal Phase and will occur when permitted HWDUs are filled or have achieved their maximum capacities as outlined in Permit Part 4, Table 4.1.1, or when the WIPP facility achieves its capacity of 6.2 million cubic feet (ft ³) (175,564 cubic meters (m ³)) of LWA TRU waste volume. The Permittees also assume closure will take 10 years."	Ensure completeness and accuracy of the Renewal Application. This paragraph establishes when the Disposal Phase will end and final facility closure will begin.
	Added "within the authorized capacities."	Ensure the completeness and accuracy of the Renewal Application by clarifying that the Disposal Phase may be extended or shortened only if there authorized TRU mixed waste disposal capacity available.
Section G-1d(1) Schedule for Panel Closure	Added new sentence: "Table G-1 shows actual dates for completed activities and future dates based on the facility design parameters discussed in Section G-1c."	Ensure the completeness and accuracy of the Renewal Application by changing the assumption regarding the last waste emplacement date for Table G-1.

Renewal Application Section	Description of Change(s)	Discussion
	Deleted the discussion of the Disposal Phase lasting 25 years and the specific dates associated with the 25-year duration.	Ensure the completeness and accuracy of the Renewal Application. The Disposal Phase will last until the disposal objectives of the DOE are reached, i.e., disposal of the nation's TRU waste per the WIPP Authorization Act of 1980 (PL 96-164). The 25-year duration used previously was based on assumptions regarding inventories (current and future) in the 1970's and a WIPP facility design criterion.
	Change sentence to read as follows: "If, as is currently projected, the WIPP facility is dismantled at closure, surface facilities (except the hot cell portion of the WHB, which will remain as an artifact of the Permanent Marker System [PMS]) will be disassembled and either salvaged or disposed in accordance with applicable standards. Subsurface facilities and equipment will be disassembled and salvaged to the extent practicable based on underground mining practice."	Ensure the accuracy of the Renewal Application. This change is necessary to indicate that with regard to dismantling, the surface facilities will be handled differently than underground facilities. For example, subsurface facilities will not be dismantled except as is practicable and consistent with mining practice.
Section G-1d(2) Schedule for Final Facility Closure	Deleted reference to 84 months for implementation of final closure. Reworded sentence as follows: "Both types of surveys will be performed at the areas of the WIPP site where hazardous waste were managed, as appropriate. These surveys, along with historical radiological survey records, will provide the basis for determining the disposition of structures, equipment, and components (i.e., disposal or decontamination for release off-site)."	Ensure the accuracy of the Renewal Application. The 84-month time period is obsolete due to potential radiation present in Exhaust Shaft. Ensure the accuracy of the Renewal Application by clarifying that not all hazardous waste management areas are subject to radiological surveys and to make the text clearer.
	Change "will" to "may." Changed "decommissioning and decontamination" to "decontamination and decommissioning." Added "(if needed)" prior to "decontamination of the shaft and haulage ways."	Ensure the accuracy of the Renewal Application. The indicated activities may not be needed in each case. Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application. Provide clarification and ensure the accuracy of the Renewal Application. The decision with regard to decontamination of shaft and haulage ways will be made in accordance with DOE Radiation
	Changed paragraph to read: "A schedule for final facility closure, showing anticipated durations for final facility closure activities, is shown in Table G-2. This schedule is based on notification of the intent to close as the initial activity, 60-days prior to the final facility closure start. Schedule details for panel closures are shown on Table G-1.	Protection Guidance and may not be required. Revise outdated/obsolete information and ensure the completeness and accuracy of the Renewal Application. Removed reference to dates in Table G-2. This table now shows activity durations and sequence.

Renewal Application Section	Description of Change(s)	Discussion
	Removed "If this alternative is used to close Panels 3, 4, 5, and 6, then Panel 9 will not be used for TRU mixed waste disposal.	Remove obsolete information and ensure accuracy of the Renewal Application, since Panel 9 was closed to facilitate the closure of Panels 3, 4, 5, and 6.
Section G-1e(1) Panel Closure	Added ", however, the inspection and maintenance, if needed, of accessible bulkheads can continue until the initiation of final facility closure" to the end of the fifth bullet.	Provide clarification and ensure the accuracy of the Renewal Application. This addition is necessary since the 35 years was a panel closure design assumption. Panel closures older than 35 years can continue to function or be replaced as needed until final closure.
	Removed reference to Figure G-4 and replaced it with a reference to Permit Attachment G1, Appendix G1-B.	Streamline the Renewal Application and ensure its accuracy and readability; Figure G-4 is duplicative of a figure in Appendix G1-B.
Section G-1e(2) Prerequisite Activities for Panel 6 Final Closure	Deleted section in its entirety; renumbered subsequent sections accordingly.	Remove obsolete information and ensure accuracy of the Renewal Application, since Panel 9 was closed to facilitate the closure of Panels 3, 4, 5, and 6.
Section G-1e(2)(a) Hazards Survey	Changed title of section from "Health and Safety" to "Hazards Survey."	Ensure the accuracy of the Renewal Application by revising the title to more accurately reflect the content of the section.
Section G-1e(2)(b) Determine the Extent of Contamination	Revised text to indicate that the hazardous constituents are those associated with the EPA Hazardous Waste Numbers.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section G-1e(2)(c) Decontamination Activities	Revised first sentence and added second sentence as follows: "Once the extent of contamination is known, radiological control activities (e.g., decontamination, fixing) will be planned and performed. Consistent with radiological control procedures pursuant to 10 CFR Part 835, decontamination activities will be performed, as necessary. Hazardous waste decontamination, if needed, will be conducted in accordance with the requirements of the Permit and the standards in 20.4.1.500 NMAC (incorporating 40 CFR Part 264)."	Provide clarification and ensure the completeness of the Renewal Application. This change assures that decontamination activities that involve TRU mixed waste will proceed in accordance with the most recent applicable DOE guidance. Hazardous waste decontamination will conform to the New Mexico Hazardous Waste Management Regulations.
	Revised text pertaining to "Start Clean – Stay Clean" to indicate that the philosophy is intended to minimize the need for decontamination at closure.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Add the following: "Decontamination activities are managed consistent with radiological control procedures pursuant to 10 CFR Part 835, which includes the	Ensure the completeness and accuracy of the Renewal Application. This change assures that decontamination activities that involve TRU mixed waste will proceed in accordance with the appropriate

Renewal Application Section	Description of Change(s)	Discussion
	ALARA principle (as low as reasonably achievable). The ALARA principle is an approach/philosophy to radiation protection to manage and control exposures (both individual and collective) to the work force and to the general public to as low as is reasonable, taking into account social, technical, economic, practical, and public policy considerations. It is assumed that the process of localized surface decontamination will remove the hazardous waste constituents along with the	governing standard.
	radioactive waste constituents." Revised text to indicate that the hazardous constituents are those associated with the EPA Hazardous Waste Numbers specified in Part A of the Permit Application.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Added "non-radioactive/non-hazardous" to listing of types of waste to be characterized.	Ensure the completeness of the Renewal Application.
	Changed title of subsection from "Waste Handling Equipment" to "Contaminated Underground Equipment."	Ensure the accuracy of the Renewal Application by revising the title to more accurately reflect the content of the subsection.
	Revised text to indicate that the Waste Shaft Conveyance, associated waste handling equipment, and underground support equipment (e.g., mining equipment, carts) that has become contaminated with hazardous waste constituents associated with TRU mixed waste will be decontaminated or characterized and dispositioned (i.e., disposed of as derived waste) as part of both contingency and final facility closure.	Clarify text to ensure the completeness and accuracy of the Renewal Application.
	Revised text to indicate that wastes generated as a result of personnel decontamination will be managed as derived wastes "and disposed of in the final open underground HWDU."	Ensure the completeness of the Renewal Application.
	Changed "less than or equal" to "managed consistent with radiological control procedures or to."	Provide clarification and ensure the completeness of the Renewal Application. This change assures that decontamination activities that involve TRU mixed waste will proceed in accordance with the most recent applicable DOE guidance.
	Changed "an approved laboratory" to "a laboratory."	Streamline the Renewal Application text and enhance its readability by removing redundancy. The sentence goes on to state that a laboratory must be qualified by the DOE according to a written program with strict criteria.
	Updated reference for SW-846.	Ensure the accuracy of the Renewal Application by referencing the

Renewal Application Section	Description of Change(s)	Discussion
		latest SW-846 method.
	Deleted text pertaining to rinsate blanks and duplicate samples and replaced it with a reference to the applicable EPA guidance.	Ensure the accuracy of the Renewal Application by removing a level of detail that is not needed and replacing it with a reference to applicable EPA guidance, thereby ensuring that it stays current.
Section G-1e(3) Performance of the Closed Facility	Added reference to Renewal Application Addendum N1 (DOE, 2020).	Ensure the completeness of the Renewal Application.
	Removed obsolete references and updated existing references.	Ensure the completeness and accuracy of the Renewal Application.
References	Added reference to original Part B Permit Application	Original Part B Permit Application contains the design parameters regarding the life of a panel. These are located in Sections D-9a, D-9b(4)(b), D-10a(3)(b) and I-1d(1).
	Added Reference to the Renewal Application.	Ensure the completeness of the Renewal Application.
	Change PANEL 7 dates to "8/21" for "Operations End", "9/21" for "Closure Start", and "2/22" for "Closure End".	Ensure the accuracy of the Renewal Application by updating to current schedule for Panel 7 use.
	Change PANEL 8 dates to "8/21" for Operations Start", "8/25" for "Operations End", "9/25" for "Closure Start", and "2/26" for "Closure End".	Ensure the accuracy of the Renewal Application by updating to current schedule for Panel 8 use.
	Changed PANEL 10 dates to "8/25" for "Operations Start" and "3/31" for "Closure End".	Ensure the accuracy of the Renewal Application by updating to current schedule for Panel 10 use.
Table G-1 Anticipated Earliest Closure Dates for the Underground HWDUs	Added row for "ADDTIONAL HWDUs" with footnote c. Added "SEE NOTE 2" for each column entry.	Additional HWDUs cannot be added at this time since the details of their design are not completed. However, the Permittees acknowledge that they will be needed, as discussed in Renewal Application Addendum G1. The new footnote explains that the additional panels may be authorized under future permit modification.
	Added footnote: " ^c Additional HWDUs may be authorized under a future modification to this Permit in accordance with Permit Part 1, Section 1.3.1. This table row is a placeholder for planning purposes only, as stated in Attachment G, Section G-1c."	The footnote is needed to explain that additional panels may be authorized under a future Permit modification.
	Removed reference to Panel 5 from NOTE 1.	Ensure the completeness of the Renewal Application. Panel 5 has been closed in accordance with the Closure Plan, and the existence of the explosion-isolation wall in Panel 5 is no longer relevant.
	Removed NOTE 2.	Ensure the accuracy of the Renewal Application. For Panel 10, "SEE NOTE 2" has been replaced with "3/31". Therefore, this note is no longer needed.
	Added NOTE 2 as follows: "NOTE 2: The "Operations Start" date for each additional HWDU is the same as the	Note is needed to clarify how additional HWDUs will be treated with regard to establishing a panel closure schedule.

Renewal Application Section	Description of Change(s)	Discussion
	"Operations End" date of the immediately prior HWDU. The "Operations End" date for each additional HWDU is 30 months after the "Operations Start" date. The "Closure Start" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure End" date for each additional HWDU is 6 months after the "Operations End" date. The Permittees anticipate submitting a permit modification request for additional HWDUs in 2021 (see Renewal Application Addendum G1, DOE, 2020)."	
Table G-2 Anticipated Overall Schedule for Closure	Revised title of table to "Anticipated Overall Schedule for Final Facility Closure Activities."	The revision is needed to reflect the revised form of the table. The form of this table is being revised because it is not possible to provide an absolute date for the start of final facility closure. To accommodate this uncertainty, the activities for final facility closure are listed in the table along with the month after closure begins that the activity will be initiated and the duration of the activity.
Activities	Changed column headings to "Start Month" and "Duration."	The revision is needed to reflect the revised form of the table.
	Changed entries to reflect starting month and the duration of the activity.	The revision is needed to reflect the revised form of the table.
	Deleted footnote indicated with an "*".	Footnote is no longer used in the table.
Permit Figure G-1 Location of Underground HWDUs and WPC Locations	Combined with Figures A2-1, A4-4a, A4-4, and G-6 and moved to Attachment M, Figure M-43; changed title to "Repository Horizon and Underground Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure G-2 WIPP Panel Closure Schedule	Moved to Attachment M, Figure M-60. Letter designations have been removed and replaced with horizontal lines.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure G-3 WIPP Facility Final Closure 84-Month Schedule	Moved to Attachment M, Figure M-61; dates have been removed, consistent with the revised form of Table G-2. Letter designations have been removed and replaced with horizontal lines.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure G-4 Bulkhead and ROM Salt Locations	Figure removed.	Streamline the Renewal Application and ensure its accuracy and readability; Figure G-4 is duplicative of a figure in Appendix G1-B.
Permit Figure G-4a Typical Substantial	Moved to Attachment M, Figure M-62.	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
Barrier and Bulkhead		
Permit Figure G-5 Typical Disposal Panel	Combined with Permit Attachment A3 and moved to Attachment M, Figure M-42.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure G-6 Approximate Locations of Boreholes in Relation to the WIPP Underground	Combined with Figures A2-1, A4-4a, A4-4, and G-1 and moved to Attachment M, Figure M-43; changed title to "Repository Horizon and Underground Waste Transport Routes."	Streamline the Renewal Application and ensure its accuracy and readability.
	Attachment	31
	WIPP Panel Closure Design Descri	ption and Specifications
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
Section G1-2 WPC Description	Added "with ROM salt" and "as the closures for Panels 3 through 6" to description of WPC-A.	Ensure the completeness and accuracy of the Renewal Application; the revision reflects closure for Panels 3, 4, 5, and 6 allowed by Attachment G.
	Changed "Figure G1-1" to "Permit Attachment G1, Appendix G1-B."	Streamline the Renewal Application and ensure its accuracy and readability; this figure is duplicative with a figure in Renewal Application Attachment G1, Appendix G1-B.
	Deleted "for Panels 1 through 8."	Ensure the accuracy of the Renewal Application. This description is no longer accurate since the closures for Panels 3, 4, 5, and 6 have been installed in the north-south mains.
Section G1-2b Design Component Descriptions	Changed text to read "WPC-A with ROM salt has been emplaced in the main entries between Panels 9 and 10"	Ensure the completeness and accuracy of the Renewal Application; the revision reflects closure for Panels 3, 4, 5, and 6.
	Changed "Figure G1-2" to "Permit Attachment G1, Appendix G1-B."	Streamline the Renewal Application and ensure its accuracy and readability; this figure is duplicative with a figure in Renewal Application Attachment G1, Appendix G1-B.
Section G1-2b(1) Steel Bulkhead	Changed "(Figure G1-3)" to "(shown in Permit Attachment G1, Appendix G1-B)."	Streamline the Renewal Application and ensure its accuracy and readability; this figure is duplicative with a figure in Renewal Application Attachment G1, Appendix G1-B.
Permit Figure G1-1 WPC Locations	Removed figure.	Streamline the Renewal Application and ensure its accuracy and readability; this figure is duplicative with a figure in Renewal Application Attachment G1, Appendix G1-B.
Permit Figure G1-2 WPC Details – Bulkhead and Run-of-Mine Salt Locations	Removed figure.	Streamline the Renewal Application and ensure its accuracy and readability; this figure is duplicative with a figure in Renewal Application Attachment G1, Appendix G1-B.

Renewal Application Section	Description of Change(s)	Discussion	
Permit Figure G1-3 WPC Details – Bulkhead Front View and Attachment Details	Removed figure.	Streamline the Renewal Application and ensure its accuracy and readability; this figure is duplicative with a figure in Renewal Application Attachment G1, Appendix G1-B.	
	Attachment G1, App	pendix A	
Tech	nical Specifications – WIPP Panel Closure, Waste	Isolation Pilot Plant, Carlsbad, New Mexico	
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.	
Division 1	Added "Run-of-mine salt will also be used as part of the Panel 9 closure" in two places.	Ensure the completeness and accuracy of the Renewal Application; the revision reflects closure for Panels 3, 4, 5, and 6 allowed by Attachment G.	
Section 01010 Part 1 Section 1.2 Scope of Work	 Added the following two sub-bullets to the "Perform the following operations for the main entries between Panels 9 and 10" bullet: Prepare the surfaces for the ROM salt placement Place ROM salt material in multiple layers 	Ensure the completeness and accuracy of the Renewal Application by clarifying the process used for placing ROM salt between Panels 9 and 10.	
Division 1 Section 01010 Part 1 Section 1.8 Contractor's Use of Site	Added "Run-of-mine salt will also be used as part of the Panel 9 closure" in two places.	Ensure the completeness and accuracy of the Renewal Application; the revision reflects closure for Panels 3, 4, 5, and 6 allowed by Attachment G.	
Division 3 Section 03100	Revised text to read, "(WPC)-A installation area north of Panel 9 prior to installation of the outbye bulkhead and to the WPC-B installation"	Ensure the completeness and accuracy of the Renewal Application; the revision reflects closure for Panels 3, 4, 5, and 6 allowed by Attachment G.	
Part 3 Section 3.2 Installation	Added "Run-of-mine salt from any underground excavation is useable as long it is free of foreign organic matter."	Ensure the completeness and accuracy of the Renewal Application by clarifying the type ROM salt that may be used.	
	Attachment G1, App	pendix B	
	Drawings – WIPP Panel Closure, Waste Isolatio	n Pilot Plant, Carlsbad, New Mexico	
NA	NA	NA	
	Attachment G2		

Renewal Application Section	Description of Change(s)	Discussion		
	Waste Isolation Pilot Plant			
	Shaft Sealing System Compliance	Submittal Design Report		
NA	NA	NA		
	Attachment G2, Ap	pendix A		
	Material Specification – Shaft Sealing System (Compliance Submittal Design Report		
NA	NA	NA		
	Attachment G2, Ap	pendix B		
Shaft	Sealing Construction Procedures – Shaft Sealing	System Compliance Submittal Design Report		
NA	NA	NA		
	Attachment G2, Ap	pendix E		
	Design Drawings – Shaft Sealing System Co	mpliance Submittal Design Report		
NA	NA	NA		
	Attachment	G3		
	Radiological Surveys to Indicate Potenti	al Hazardous Waste Releases		
	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.		
General	Changed instances of "spills" or "release" to "spill or release."	Ensure the completeness and accuracy of the Renewal Application.		
	Changes instances of "radioactivity" to "radioactive constituents."	Ensure accuracy and enhance the readability of the Renewal Application.		
Section G3-1 Purpose	Revised text to indicate that the "detection of radiological contamination on surfaces is used to indicate whether a potential release of hazardous constituents has occurred."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application. See discussion below for changes proposed to Section G3-2, <i>Definition</i> .		
Section G3-2 Definition	Reworded paragraph as follows: "This Permit Attachment describes the principle of co-detection. Co- detection is defined as the process of identifying hazardous waste releases from containers of transuranic (TRU) mixed waste by performing	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application. Co-detection only applies to detection of releases on surfaces. This was the original intent of the co-detection method. The need arose for the situation at the time of the initial Permit that analytical laboratories could not readily handle performing		

Renewal Application Section	Description of Change(s)	Discussion
	radiological surveys on surfaces and assuming the release of a radioactive constituent indicates the concurrent release of a hazardous waste constituent. Co-detection does not apply to the gaseous release of volatile organic compounds (VOC) from TRU mixed waste containers nor does it apply to the detection of radioactive constituents in water. Radiological surveys are used to indicate the potential presence or absence of hazardous waste constituents based on the presence or absence of radioactive constituents on surfaces. Radiological surveys do not provide an assessment with regard to the concentrations of hazardous waste constituents, since these surveys do not actually detect hazardous waste constituents."	hazardous waste analysis on samples, such as swipes, that were contaminated with radioactive elements. Therefore, the method of co- detection assumed that if the surface was radioactively contaminated, then it was also contaminated with hazardous waste constituents that were mixed with the radioactive waste. Decontamination could then proceed without first determining the presence of the hazardous constituent. Once radiologically decontaminated, samples could then be collected that would be free of radioactivity and could, therefore, be analyzed by a laboratory for hazardous constituents. Based on the results of the laboratory analysis, the surface would be determined clean or further decontamination would proceed. There have been attempts over the years to apply the principle of co- detection to airborne and water borne contamination. The method was not evaluated for this application, and its direct use is not obvious since the air or water may have background hazardous materials that could be mistaken as releases from containers of mixed-waste. Therefore, the Permittees have made numerous revisions to the text to emphasize that the method only applies to contamination on surfaces. The Permittees are also clarifying that use of the method is limited to swipes and some types of surveys that determine the presence of surface contamination. Text has been revised to avoid the use of the term "monitoring" throughout Attachment G3 since it implies using
Section G3-3 Discussion	Changed "WIPP facility" to "Permittees" and removed "non-VOC."	devices or methods that sample air or water. Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section G3-3a	Revised the first sentence to read, "The hazardous waste constituents in TRU mixed waste are mainly U.S. Environmental Protection Agency (EPA) F-coded solvents and metals that exhibit the toxicity characteristic."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Nature of the Hazardous Waste Portion of TRU Mixed Waste	Revised last sentence of first category description to read, "These waste forms are not homogeneous in nature; however, they are generated in a fashion that distributes the hazardous and radioactive contaminants throughout the waste matrix."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Removed paragraph beginning, "Some waste forms only contain radioactive contamination on the	Remove descriptive information that is no longer relevant; surface contamination subject to co-detection would be managed the same

Renewal Application Section	Description of Change(s)	Discussion
	surface"	regardless of the porosity of the surface of the waste. This is because other hazardous constituents may be present in the waste that are not part of the matrix (e.g., solvents used in the cleaning process).
	Changed "particulate resulting from the catastrophic failure of a container" to "particulate resulting from the failure of the confinement capability of a container."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Added "assumed to be" prior to "intimately mixed."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section G3-3b Nature of the TRU Mixed Waste	Changed "radiological monitoring" to "radiological detection."	Provide clarification and ensure accuracy of the Renewal Application. Not all monitoring methods are appropriate for applying the principle of co-detection. See discussion above for changes proposed to Section G3-2, <i>Definition.</i>
	Revised first sentence of second paragraph as follows: "Radioactive materials releases resulting from unique and representative hazard evaluation events are documented in the WIPP Documented Safety Analysis (DSA) (DOE 2018). Surface contamination of a waste container is considered to be a credible source of contamination external to the containers during normal operations."	Clarify the Renewal Application and provide necessary updates, thereby enhancing the accuracy and completeness of the Renewal Application. This change clarifies why surface contamination is considered an indicator of a spill or release when no visible evidence is present. It also updates the reference to the Final Safety Analysis Report which has been superseded by the Documented Safety Analysis.
Section G3-3c Nature of the Releases	Revised text as follows: "Surface contamination is detected after arrival at the WIPP facility through the use of swipes and radiation surveying equipment, as specified in radiological control procedures pursuant to 10 CFR Part 835. Surveying for radioactive constituents allows for the detection of contamination that may not be visible on the surface of the container."	Provide clarification and ensure the accuracy of the Renewal Application. This change assures that using swipes for surface contamination that involve TRU mixed waste will proceed in accordance with the governing DOE standards, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to 10 CFR Part 835, should those standards be revised. See also discussion above for changes proposed to Section G3-2, <i>Definition</i> .
	Change reference to "Permit Part 3" to "Permit Attachment E" relative to RCRA-required inspections.	Ensure the accuracy of the Renewal Application.
	Revised last paragraph as follows: "Releases due to accidents are modeled in the WIPP DSA. For the purposes of co-detection, releases are detectable using surface-contamination detection techniques."	Remove obsolete information and enhances the readability of the Renewal Application. Text pertaining to significant accidents within the waste handling process is obsolete. The assumption regarding the significance of accidents is not relevant to hazardous waste management activities at the WIPP facility. If a release is detected, it will be managed appropriately.
Section G3-4	Removed "(except VOC)."	Ensure the accuracy of the Renewal Application.
Application of	Added "on a contaminated surface" after "the	See discussion above for changes proposed to Section G3-2,

Renewal Application Section	Description of Change(s)	Discussion
Radiological Surveys	hazardous component is also present."	Definition.
Section G3-4a TRU Mixed Waste Processing	Changed paragraph to read, "Tables G3-2, G3-2a, and G3-3 specify the various steps in the process of receiving and disposing containers of CH TRU mixed waste, including RH TRU mixed waste in shielded containers and RH TRU mixed waste, respectively, where radiological surveys will be performed by the Permittees in accordance with radiological control procedures pursuant to 10 CFR Part 835."	Provide clarification and ensure the accuracy of the Renewal Application. This change assures that radiological control procedures will proceed in accordance with the governing DOE standards, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to 10 CFR Part 835, should those standards be revised. See also discussion above for changes proposed to Section G3-2, <i>Definition</i> .
Section G3-4b TRU Mixed Waste Releases	Added "from contaminated surfaces" to "to confirm the removal of hazardous waste constituents."	See discussion above for changes proposed to Section G3-2, <i>Definition</i> .
Table G3-2 Radiological Surveys During CH TRU Mixed	Added row, "Exterior of CH package after arrival at the WIPP facility." Added "and ten-drum overpack (TDOP)" after "standard waste box (SWB)."	Ensure the completeness and accuracy of the Renewal Application.
Waste Processing (TRUPACT-II/HalfPACT)	Changed footnote "a" as follows: "Surface contamination surveys of CH packages are performed in accordance with radiological control procedures pursuant to 10 CFR Part 835."	Ensure the completeness and accuracy of the Renewal Application. This change assures that radiological control procedures will proceed in accordance with the governing DOE standards, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to 10 CFR Part 835, should those standards be revised.
Table G3-2a Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-III)	Changed footnote "a" as follows: "Surface contamination surveys of CH packages are performed in accordance with radiological control procedures pursuant to 10 CFR Part 835."	Ensure the completeness and accuracy of the Renewal Application. This change assures that radiological control procedures will proceed in accordance with the governing DOE standards, thereby eliminating a vulnerability in the Permit where descriptive information may conflict with or become outdated with respect to 10 CFR Part 835, should those standards be revised.
Table G3-3 Radiological Surveys During RH TRU Mixed Waste Processing	Deleted entry in "Surface Contamination Column."	Ensure the accuracy of the Renewal Application; surveys are not performed on this portion of the CNS 10-160 Cask.
Attachment H		
Post-Closure Plan		
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
Section H-1 Post-Closure Plan	Revised text to read, "These are routine inspection of the openings in the vicinity of the closures and bulkheads used as part of the closures coupled with repair or replacement of bulkheads that no longer serve their purpose as panel closures; the sampling of ventilation air for harmful constituents"	Ensure the completeness of the Renewal Application by rewording text to include panel closure inspections in the process for assuring post-closure compliance.
Section H-1a(1) Post-Closure Plan after Final Facility Closure;	Revised text to read, "This plan will include acceptable radiological decontamination levels pursuant to 10 CFR Part 835"	Ensure completeness of the Renewal Application by assuring that establishing acceptable radiological levels is in accordance with the most recent applicable standard.
Preparation of the Active Institutional Control Plan	Changed "such future plan" to "the Active Institutional Control Plan."	Clarify which plan is being referred to in the text, thereby assuring the completeness of the Renewal Application.
	Attachment H	11
	Active Institutional Controls D	uring Post-Closure
Canaral	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
General	Figure references changed throughout to correspond with figure numbers in Attachment M, <i>Figures.</i>	Ensure the accuracy of the Renewal Application; Figures in Attachment H1 have been consolidated into Attachment M, <i>Figures.</i>
	Changed "The WIPP was sited and designed as a research and development facility" to "The WIPP facility was authorized by Congress as a research and development facility"	Ensure the accuracy of the Renewal Application.
	Revised text pertaining to WIPP Project mission as follows: "the mission of the WIPP Project is to facilitate disposal of TRU wastes."	Ensure the accuracy of the Renewal Application; text revised to accurately state the current mission of the WIPP Project.
Introduction	Changed "waste emplacement and disposal phase" to "Disposal Phase."	Remove redundancy and enhance the readability of the Renewal Application; waste emplacement is part of the Disposal Phase;
Introduction Background	Deleted the sentence, "For the purposes of this Permit Attachment, this time period is assumed to be 25 years."	Ensure the completeness and accuracy of the Renewal Application. Consistent with the changes being proposed in Attachment G, 25 years is no longer the assumption regarding the duration of the Disposal Phase.
	Removed details pertaining to the types of CH and RH containers; revised remaining text to read, "The CH and RH TRU mixed waste will be packaged in approved containers as listed in Permit Part 3, Section 3.3.1 and described in Permit Attachment A1."	Remove redundancy with information in Attachment A1, thereby streamlining the text of the Renewal Application and enhancing its readability.
	Removed text pertaining to Panel 1.	Remove obsolete historical information that no longer has any

Renewal Application Section	Description of Change(s)	Discussion
		relevance in the Permit.
	Changed "Panels 2 through 8" to "panels" in the sentence pertaining to sequential excavation.	Ensure the accuracy of the Renewal Application. This revision updates descriptive information, as Panel 8 is the only authorized panel currently being excavated.
	Revised beginning of last paragraph to read, "Decontamination of the WIPP facility will commence with a detailed radiation survey of the entire site. Radiological contaminated areas and equipment will be evaluated and decontaminated consistent with radiological control procedures pursuant to 10 CFR Part 835. Hazardous waste decontamination, if needed, will be conducted in accordance with standard 20.4.1.500 NMAC (incorporating 40 CFR Part 264) or as prescribed by the Permit. Where decontamination efforts identify areas that meet clean closure standards for permitted container storage units and are below radiological control limits pursuant to 10 CFR Part 835, routine dismantling and salvaging practices will determine the disposition of the material or equipment involved."	Ensure the completeness of the Renewal Application. This change assures that activities will be conducted in accordance with the most- current applicable standard, 10 CFR Part 835.
	Revised sentence in last paragraph to read, "Material and equipment that do not meet these standards and criteria will be emplaced in the final open disposal area."	Ensure the accuracy of the Renewal Application. This change allows the final open disposal area to be any authorized panel and not restricted to the access entries or Panels 9 or 10.
Section H1.1.2 Surveillance Monitoring	Revised text pertaining to surveillance via drive-by patrolling to indicate that it will occur "two times per week (weather and road conditions permitting)" and not "three times per week."	Ensure the accuracy of the Renewal Application. This change ensures consistency between the Renewal Application and the 40 CFR Part 191 Compliance Recertification Application.
Permit Figure H1-1 Spatial View of WIPP Surface and Underground Facilities	Combined with Figure A2-2 and moved to Attachment M, Figure M-44.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure H1-2 Standard Waste Box and Seven Pack Configuration	Figure removed.	Streamline the Renewal Application by removing duplicative information. The standard waste box is depicted in Attachment M, Figure M-4; the seven-pack configuration is shown on other figures within Attachment M.
Permit Figure H1-3 Typical Shaft Sealing System	Moved to Attachment M, Figure M-63.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure H1-3	Moved to Attachment M, Figure M-64.	Streamline the Renewal Application and ensure its accuracy and

Renewal Application Section	Description of Change(s)	Discussion
Perimeter Fenceline and Roadway		readability.
	Attachment	L
	WIPP Groundwater Detection Mo	nitoring Program Plan
	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
General	Figure references changed throughout to correspond with figure numbers in Attachment M, <i>Figures.</i>	Ensure the accuracy of the Renewal Application; figures in Attachment L have been consolidated into Attachment M, <i>Figures</i> .
General	Added reference to Renewal Application, Addendum L1, as appropriate, for detail regarding site characterization.	Ensure the completeness and accuracy of the Renewal Application.
	Added new references throughout to support added text.	Ensure the completeness and accuracy of the Renewal Application.
Section L-1 Introduction	Revised "The Culebra is the most significant water- bearing unit lying above the repository" to "The Culebra is the most transmissive waster-bearing unit lying above the repository."	Ensure the completeness and accuracy of the Renewal Application. The term, "important," is subjective; this change clarifies the reason the Culebra is the most important water-bearing unit is because it is the most transmissive.
	Modified last paragraph by moving sentence pertaining to procedures to the beginning of the paragraph.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section L-1a(1) Geology	Changed "the south central region of North America" to "western Texas and southeastern New Mexico."	Clarify the geography of the Permian Basin by adding specificity, thereby ensuring the accuracy of the Renewal Application.
Section L-1a(2)(i) The Castile	Changed unit for hydraulic conductivity to meters per second (m/s) as the SI unit.	Ensure the accuracy of the Renewal Application. Meters per second is the SI Unit for Hydraulic Conductivity rather than meters per day.
Section L-1a(2)(ii) The Salado	Added the square meters (m ²) as the SI unit for microdarcys.	Ensuring the completeness and accuracy of the Renewal Application by providing the SI units.
Section L-1a(2)(iii) The Rustler	Added the as meters squared per second (m ² /s) as the SI units.	Ensuring the completeness and accuracy of the Renewal Application by providing the SI units.
	Revised text to clarify the use of pressure data from long-term pumping tests and the interpreted transmissivity values for individual wells by changing "in calibration of" to "develop the conceptual model for incorporation into."	Ensure the accuracy of the Renewal Application.
	Added "(secondary porosity)" after "relative abundance of open fractures" and "porosity" after "primary."	Ensure the accuracy of the Renewal Application by providing a better definition of the features presented.
	Deleted vague descriptions of lateral variability and added text from Holt and Powers (1988). Added new	Ensure the completeness and accuracy of the Renewal Application; the new text provides a more detailed description for the Culebra

Renewal Application Section	Description of Change(s)	Discussion
	paragraph with further description for transport processes through the Culebra.	features.
	Added text describing recent data for isotopic dating.	Ensure the completeness and accuracy of the Renewal Application.
	Changed "zone" to "facies," where appropriate.	Ensure the accuracy of the Renewal Application. This change better aligns the Renewal Application text with the findings of Beauheim (2008).
	Rearranged text regarding the conceptual geochemical model.	Ensure the accuracy of the Renewal Application; this change makes previous discussion more concise.
	Added discussion of recent water-level changes, citing the appropriate reference.	Ensure the accuracy of the Renewal Application.
Section L-3b	Revised text regarding demonstration of compliance with the environmental performance standards; this text is consistent with language in Permit Part 5.	Ensure the accuracy of Renewal Application by clarifying the regulatory requirements.
Current WIPP DMP	Changed "The wells used for measuring" to "Water levels used to determine."	Provides clarification and enhances the accuracy of statement; the water-level measurements are used to determine the potentiometric surface of the Culebra, not the wells themselves.
Section L-3b(1) Detection Monitoring Well Construction Specifications	Revised/added text regarding well construction.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section L-4c Groundwater Surface Elevation Measurement, Sample Collection and Laboratory Analysis	Revised text to remove references to final and serial sampling.	Provide updated information, thereby ensuring the completeness and accuracy of the Renewal Application. Serial sampling is associated with an older procedure. Field indicator parameters (i.e., temperature, pH, and conductivity) are now measured through the use of a flowthrough cell. Field parameter analysis is the measurement of data from temperature, specific conductivity, and pH meters installed in a flowthrough cell for the purpose of determining when the groundwater chemistry stabilizes and is, therefore, representative of undisturbed groundwater.
Section L-4c(1) Groundwater Surface Elevation Monitoring	Added text to clarify if the "change in elevation" is not attributable to site tests or natural stabilization of the site hydrologic system.	Ensure the accuracy of the Renewal Application.
	Revised text to indicate that fluid densities are "calculated," not "measured."	Provide clarification and ensure the accuracy of the Renewal Application. Measured freshwater pressure head and water levels are used calculate fluid density.
Methodology	Corrected symbols used in the fluid density equation.	Ensure the accuracy of the Renewal Application.
	Deleted text regarding density being 1.000 grams per cubic centimeter.	Ensure the accuracy of the Renewal Application. Freshwater density can be slightly below 1.000 depending on temperature; it cannot be

Renewal Application Section	Description of Change(s)	Discussion
Section L-4c(1)(i) Field Methods and Data Collection Requirements	Deleted "calibrated."	assumed. An initial calibration is performed by the manufacturer. A process change has been made where the tape will be measured annually, and if it does not match the measuring tape, the water-level measuring device will be discarded. Therefore, ongoing calibrations are not required.
	Replaced "Incoming data" with "Groundwater surface elevation measurement data," and changed "groundwater surface elevation measurements" to "groundwater surface elevation measurement data."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Deleted "calibration due date."	Provide updated information, thereby ensuring the completeness and accuracy of the Renewal Application. An initial calibration is performed by the manufacturer. A process change has been made where the tape will be measured annually, and if it does not match the measuring tape, the water-level measuring device will be discarded. Therefore, the calibration due date need not be recorded.
Section L-4c(1)(ii) Groundwater Surface	Changed "(i.e., well lock missing)" to "(e.g., well lock missing, casing damage)" to better capture types of security observations.	Ensure the completeness and accuracy of the Renewal Application.
Elevation Records and Document Control	Deleted "specific type of" prior to "submersible pump."	Ensure the accuracy of the Renewal Application. This prescriptive language limits using different pumps, if need be.
Document Control	Changed "field parameters" to "field indicator parameters," and replaced "serial sampling" with "field parameter analysis."	Provide updated information, thereby ensuring the completeness and accuracy of the Renewal Application. Serial sampling is associated with an older procedure. Field indicator parameters (i.e., temperature, pH, and conductivity) are now measured through the use of a flowthrough cell. Field parameter analysis is the measurement of data from temperature, specific conductivity, and pH meters installed in a flowthrough cell for the purpose of determining when the groundwater chemistry stabilizes and is, therefore, representative of undisturbed groundwater.
	Added "(fiberglass-reinforced plastic)" after "materials," and deleted "(high epoxy fiberglass)" at the end of the sentence.	Provide clarification and ensure the accuracy of the Renewal Application. Fiberglass-reinforced plastic is the correct term.
Section L-4c(2)(ii) Field Parameter Analysis	Changed title of section from "Serial Sampling" to "Field Parameter Analysis." Deleted text associated with serial sampling and replaced it with references to field parameter analysis throughout section, as appropriate.	Provide updated information, thereby ensuring the completeness and accuracy of the Renewal Application. Serial sampling is associated with an older procedure. Field indicator parameters (i.e., temperature, pH, and conductivity) are now measured through the use of a flowthrough cell. Field parameter analysis is the measurement of data

Renewal Application Section	Description of Change(s)	Discussion
		from temperature, specific conductivity, and pH meters installed in a flowthrough cell for the purpose of determining when the groundwater chemistry stabilizes and is, therefore, representative of undisturbed groundwater.
	Added text to define field parameter analysis.	Ensure the completeness and accuracy of the Renewal Application.
Section L-4c(2)(iii)	Changed "A serial sample" to "Collected data."	Provide updated information, thereby ensuring the completeness and accuracy of the Renewal Application. Serial sampling is associated with an older procedure. Field indicator parameters (i.e., temperature, pH, and conductivity) are now measured through the use of a flowthrough cell.
Final Samples	Delete text related to rinsate blank.	Provide updated information, thereby ensuring the completeness and accuracy of the Renewal Application. A flowthrough cell is used to perform field parameter analyses; therefore, collecting a rinsate blank sample is no longer performed.
Section L-4c(2)(v) Sample Documentation and Custody	Added or "custody tape" after "Custody seals."	Ensure the completeness and accuracy of the Renewal Application by revising the text to provide another option for securing samples.
-	Updated reference for SW-846.	Ensure the accuracy of the Renewal Application by referencing the latest SW-846 method.
Section L-4c(3) Laboratory Analysis	Replaced "on an annual basis by January 31" with "upon request."	Change the frequency for providing the NMED with standard operating procedures from annually to upon request. The Permittees are required to maintain the laboratory SOPs in the Operating Record. When requested, this will ensure that NMED has the latest laboratory SOPs instead of outdated SOPs. This change improves program efficiency.
Section L-4e(4) Comparisons and Reporting	Changed "measurements were made of each background groundwater quality hazardous constituent" to "measurements were made to establish a background concentration for each groundwater quality hazardous constituent."	Ensure the accuracy of the Renewal Application. This clarification better describes the measurements that were taken at each DMW well prior to TRU mixed waste emplacement.
Section L-7a(1)(i) Detection Monitoring Program	Added "The DQO for the DMP is stated as follows:" to the beginning of the section.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section L-7a(1)(ii) Water Level Monitoring Program	Added "The DQO for the WLMP is stated as follows:" to the beginning of the section.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section L-7a(2)(ii) Precision	Changed formula to the mathematical version and added descriptors for the acronyms.	Ensure the completeness and accuracy of the Renewal Application by providing a more appropriate formula for the calculation of RPD.

Renewal Application Section	Description of Change(s)	Discussion
Section L-7a(2)(ii)(A) Precision Objectives for Field Measurements	Revised text to indicate that water densities are "calculated," not "measured."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section L-7f Control of Monitoring and Data Collection Equipment	Changed "and it will not be used until corrections are made" to "and removed from service until corrections have been made."	Clarify text to indicate that equipment will be tagged and removed from service until corrections to tolerance have been made, thereby ensuring the completeness and accuracy of the Renewal Application.
Section L-7i Quality Assurance Records	Changed "WIPP document" to "Standard operating procedure."	Ensure the accuracy of the Renewal Application by creating consistency with Table L-3.
Section L-8 References	Added two new references.	Provide updated information, thereby ensuring the completeness and accuracy of the Renewal Application.
Table L-4 List of Culebra Wells in the WLMP, Current as of January 2020	Added "R" to wells "H-5b" and "WIPP-11" to read "H- 5bR" and "WIPP-11R."	Ensure the accuracy of the Renewal Application since these wells have been replaced.
Table L-6 Analytical Parameter and Sample Requirements	Removed footnote 1 and renumbered the remaining two footnotes.	Ensure the accuracy of the Renewal Application by removing a vague footnote relative to indicator parameters.
Permit Figure L-1 General Location of the WIPP Facility	Combined with Figure A4-1 and moved to Attachment M, Figure M-56.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-2 WIPP Facility Boundaries Showing 16-square-Mile Land Withdrawal Boundary	Moved to Attachment M, Figure M-65.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-3 Site Geologic Column	Moved to Attachment M, Figure M-66.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-4 Generalized Stratigraphic Cross Section above Bell Canyon Formation at WIPP Site	Moved to Attachment M, Figure M-67.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-5 Culebra Freshwater Head Potentiometric Surface	Moved to Attachment M, Figure M-68.	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
Permit Figure L-6 Detection Monitoring Well Locations	Moved to Attachment M, Figure M-69.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-7 As-Built Configuration of Well WQSP-1	Moved to Attachment M, Figure M-70.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-8 As-Built Configuration of Well WQSP-2	Moved to Attachment M, Figure M-71.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-9 As-Built Configuration of Well WQSP-3	Moved to Attachment M, Figure M-72.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-10 As-Built Configuration of Well WQSP-4	Moved to Attachment M, Figure M-73.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-11 As-Built Configuration of Well WQSP-5	Moved to Attachment M, Figure M-74.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-12 As-Built Configuration of Well WQSP-6	Moved to Attachment M, Figure M-75.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure L-13 Example Chain of Custody/Request for Analysis Form	Removed figure.	Removed unnecessary detail that does not support a Permit requirement and is not required by the New Mexico Hazardous Waste Management Regulations.
Permit Figure L-14 Groundwater Level Surveillance Wells (inset represents the groundwater surveillance wells in WIPP Land Withdrawal Area)	Moved to Attachment M, Figure M-76.	Streamline the Renewal Application and ensure its accuracy and readability.
	Attachme	ent N
	Volatile Organic Compou	Ind Monitoring Plan
General	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
	Figure references changed throughout to correspond with figure numbers in Attachment M, Figures.	Ensure the accuracy of the Renewal Application; Figures in Attachment N have been consolidated into Attachment M, <i>Figures.</i>
	Updated reference for SW-846.	Ensure the accuracy of the Renewal Application by referencing the latest SW-846 method.
	Added "transuranic (TRU)" before "mixed waste."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Section N-1 Introduction	Removed "(includes ongoing disposal room VOC monitoring)."	Remove obsolete language that is no longer applicable to hazardous waste management activities. The requirement for ongoing disposal room VOC monitoring was removed as part of the Class 3 PMR titled "Modifications to the WIPP Panel Closure Plan" which was approved by NMED on September 7, 2018.
Section N-3a(2) Sampling Locations for Disposal Room VOC Monitoring	Revised section.	Clarify and streamline Renewal Application text for the installation of VOC monitoring equipment.
Section N-3c Sampling and Analysis Methods	Removed sentence beginning "The VOC monitoring programs include a"	Streamline the Renewal Application text and enhance its readability. This sentence is unnecessary and out-of-place. An introduction and summary of the VOC monitoring program is provided in Section N-1.
Section N-3d(2) Sampling Schedule for Disposal Room VOC Monitoring	Removed sentence beginning "Beginning with Panel 3, disposal room"	Remove obsolete language that is no longer applicable to hazardous waste management activities. The requirement for ongoing disposal room VOC monitoring was removed as part of the Class 3 PMR titled "Modifications to the WIPP Panel Closure Plan" which was approved by NMED on September 7, 2018.
Section N-4b Sample Collection	Changed "controller" to "meter."	Provide clarification and ensure the accuracy of the Renewal Application. There is a difference in function between a controller and a meter. A controller regulates the flow. A meter reads the flow. For this stated function, a meter is required so that we can see the results of the adjustments we make to the sampling equipment flow.
Section N-3e(1)	Revised section to outline the discrete steps for calculation the total carcinogenic risk and total hazard index. In Step 1, clarified that the carcinogenic risk is the risk due to exposure to target.	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
Data Evaluation and Reporting for Repository VOC Monitoring	Revised text to indicate that comparing the total carcinogenic risk and total hazard index to the action levels will establish whether "the combined effect of" the concentrations of VOCs in the emissions from the underground HWDUs exceeded the action levels at the	Ensure the accuracy of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
	time of sampling.	
Section N-4e Analytical Procedures	Replaced "on an annual basis by January 31" with "upon request."	Change the frequency for providing the NMED with standard operating procedures from annually to upon request. The Permittees are required to maintain the laboratory SOPs in the Operating Record. When requested, this will ensure that NMED has the latest laboratory SOPs instead of outdated SOPs. This change improves program efficiency.
Section N-5 Quality Assurance	Replaced "at anytime" with "upon request."	Ensure the accuracy of the Renewal Application by creating consistency when referring to the review of documentation by the NMED.
Section N-5a Quality Assurance Objectives for the Measurement of Precision, Accuracy, Sensitivity, and Completeness	Replaced the asterisk in the equation with an "x."	Clarify the multiplication sign in the equation and enhance the readability of the Renewal Application.
	Removed "contain documentation of all pertinent data for the sampling and will."	Remove unnecessary text and streamline the required information for the field sampling data sheets.
Section N-5d Data Reduction,	Removed "and ambient temperature."	Ensure the accuracy of the Renewal Application. Ambient temperature is not used to calculate emissions from VOCs. This parameter is not used in the VOC Monitoring Program.
Validation, and Reporting	Replaced "hard" to "certified."	Ensure the accuracy of the Renewal Application. This change allows the Permittees the flexibility of receiving an electronic or paper copy data package and clarifies that it will be a certified copy.
Section N-5e Performance and System Audits	Removed paragraph starting "By May 1, 2016 the Permittees shall develop and implement" and revised the subsequent paragraph to read, "The Permittees have implemented a proficiency testing (PT) plan. The PT plan includes the following, as applicable:"	Remove historical language that is obsolete and no longer needed. The Permittees require the analytical laboratory to perform proficiency testing in lieu of an LPEP as allowed by this section of the Renewal Application.
Section N-6 Sampling and Analysis Procedures for Disposal Room VOC Monitoring in Filled Panels	Removed section.	Remove obsolete language that is no longer applicable to hazardous waste management activities. The requirement for ongoing disposal room VOC monitoring was removed as part of the Class 3 PMR titled "Modifications to the WIPP Panel Closure Plan" which was approved by NMED on September 7, 2018.
Permit Figure N-1 Repository VOC Monitoring Locations	Moved to Attachment M, Figure M-77.	Streamline the Renewal Application and ensure its accuracy and readability.

Renewal Application Section	Description of Change(s)	Discussion
Permit Figure N-2 VOC Monitoring System Design	Moved to Attachment M, Figure M-80.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure N-2 VOC Monitoring System Design (continued)	Moved to Attachment M, Figure M-81.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure N-3 Typical Disposal Room VOC Monitoring Locations	Moved to Attachment M, Figure M-78.	Streamline the Renewal Application and ensure its accuracy and readability.
Permit Figure N-4 Disposal Room Sample Head Arrangement	Moved to Attachment M, Figure M-79.	Streamline the Renewal Application and ensure its accuracy and readability.
	Attachment	0
	WIPP Mine Ventilation Rate	Monitoring Plan
	Global editorial changes described above.	Ensure accuracy and enhance the readability of the Renewal Application.
General	Added "disposal" before "room," where applicable.	Ensure accuracy and enhance the readability of the Renewal Application.
	Updated the reference from McPherson (1993) to McPherson (2009).	Ensure the accuracy of the Renewal Application.
Section O-1 Definitions	Replaced "normal" with "unescorted."	Ensure the accuracy of the Renewal Application.
Section O-2 Objective	Deleted the sentence beginning "This plan contains the following elements"	Streamline the Renewal Application text by removing redundancy, as the elements outlined are captured in the section titles of the attachment.
Section O-3a(1) Test and Balance	Added "underground" before "ventilation system." Replaced "calibrated vane anemometer" with "calibrated anemometer."	Ensure the accuracy of the Renewal Application. Ensure the accuracy of the Renewal Application. This change allows the Permittees the option of using a calibrated digital anemometer in lieu of a calibrated vane anemometer, if appropriate.
Process	Replaced "a commercially available" with "an appropriate."	Ensure the accuracy of the Renewal Application. This change allows the Permittees the flexibility to use a ventilation simulator that may or may not be commercially available to process Test and Balance field data.
Section O-3a(2) Test and Balance	Replaced, "The quality and maintenance of ventilation control structures (e.g., bulkheads) is excellent, so	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.

Renewal Application Section	Description of Change(s)	Discussion
Schedule	leakage is small and relatively constant," with "Maintenance of ventilation control structures (e.g., bulkheads) occurs periodically to ensure the ventilation structure performs as expected."	
Section O-3b(2) Measurement and Calculation of the Active Room Airflow	Replaced "The" with "During waste disposal operations, the."	Provide clarification, ensure accuracy, and enhance the readability of the Renewal Application.
	Added "The list of equipment used to conduct the Test and Balance and to determine the airflow through the active disposal room(s) is provided in Table O-1."	Ensure the completeness and accuracy of the Renewal Application.
Section O-4 Equipment Calibration and Maintenance	Revised sentence pertaining to equipment calibration to read, "Equipment shall be calibrated, as appropriate, in accordance with WIPP facility calibration and data collection procedures."	Enhance the readability of the Renewal Application.
	Removed "Equipment used to conduct the Test and Balance, and to determine the airflow through the active disposal room(s) are provided in Table O-1."	Enhance the readability of the Renewal Application by revising this sentence and moving it from the end of the section to the beginning of the section.

* Renewal Application sections not specifically listed under the Attachment subheadings were either unchanged or only subjected the Global Editorial Changes.

RENEWAL APPLICATION HAZARDOUS WASTE FACILITY PERMIT APPLICATION PART A

RENEWAL APPLICATION HAZARDOUS WASTE FACILITY PERMIT APPLICATION PART A

TABLE OF CONTENTS

Information Required by 40 CFR Part 270, §270.13, Contents of Part A of the Permit Applica	
Form OMB# 2050-0024, RCRA Subtitle C Site Identification Form and Hazardous Waste Per Part A Form	
RCRA Part A Application Certification	20
Appendix 1 Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant a March 2020	
Appendix 2 Maps	29
Figure 2-1 General Location of the WIPP Facility Figure 2-2 Topographic Map with Underground Facilities (March 2020) Figure 2-3 Planimetric Map-WIPP Facility Boundaries	31
Appendix 3 Facilities	33
Figure 3-1 Spatial View of the WIPP Facility Figure 3-2 Waste Handling Building Unit- TRU Mixed Waste Container Storage and Surge Areas Figure 3-3 Parking Area Unit – TRU Mixed Waste Container Storage and Surge Areas Figure 3-4 RH Hot Cell Storage Area Figure 3-5 RH Canister Transfer Cell Storage Area and Waste Transport Route Figure 3-6 Repository Horizon Figure 3-7 Typical Disposal Panel	35 36 37 38 39 40
Appendix 4 Photographs	41
Figure 4-1 Aerial Photograph of the Waste Isolation Pilot Plant Figure 4-2 Underground - Panel 7 - Panel Entry Figure 4-3 Aerial Photograph of the Waste Handling Building Figure 4-4 TRUDOCK (East) in CH Bay of the Waste Handling Building Figure 4-5 NE Corner of CH Bay of the Waste Handling Building Figure 4-6 Waste Shaft Conveyance - Loading Facility Pallet with CH TRU Waste, Waste Handling Building Figure 4-7 RH Bay	43 44 45 46
Figure 4-7 RH Bay Figure 4-8 Cask Unloading Room and Bridge Crane	
Figure 4-9 Hot Cell Figure 4-10 Transfer Cell	
Figure 4-11 Facility Cask Loading Room and Facility Cask Rotating Device	

1	Information Required by 40 CFR Part 270, §270.13, Contents of Part A of the Permit
2	Application

Information Required By 40 CFR Part 270, §270.13, Contents of Part A of the Permit Application

- ³ Part A of the RCRA application shall include the following information:
- 4 (a) The activities conducted by the applicant which require it to obtain a permit under RCRA.
- No changes are being proposed to the activities conducted at the Waste Isolation Pilot
 Plant (WIPP) facility that entail receiving, unloading, and transferring radioactive-mixed
 waste from the surface of the site to the underground hazardous waste management
 units. Waste will be emplaced in an underground geologic repository horizon located in a
 deep-bedded salt formation 2,150 feet beneath the surface.
- (b) Name, mailing address, and location, including latitude and longitude of the facility for which
 the application is submitted.
- 12 Waste Isolation Pilot Plant
- 13 P.O. Box 3090
- 14 Carlsbad, New Mexico, 88221
- 15 34 Louis Whitlock Road, Carlsbad, New Mexico, 88220
- 16 Geographic location:
- 17 32° 22′ 11″ N 18 -103° 47′ 29″ W
- (c) Up to four SIC codes which best reflect the principal products or services provided by the
 facility.
- 21 North American Industry Classification System Code for the WIPP facility: 56221
- (d) The operator's name, address, telephone number, ownership status, and status as Federal,
 State, private, public, or other entity.
- 24 Owner and Operator:

25 26 27	U.S. Department of Energy P.O. Box 3090 Carlsbad, New Mexico, 88221
28	Phone Number: 575-234-7300
29	The WIPP facility is a Federal facility
30	Co-operator:
31	Nuclear Waste Partnership LLC
32	P.O. Box 2078
33	Carlsbad, New Mexico, 88221
34	Phone Number: 575-234-7400

- 1 (e) The name, address, and phone number of the owner of the facility.
- 2 U.S. Department of Energy
- ³ P.O. Box 3090
- 4 Carlsbad, New Mexico, 88221
- 5 Phone Number: 575-234-7300
- 6 (f) Whether the facility is located on Indian lands.
- 7 The WIPP facility is not located on Indian lands.
- (g) An indication of whether the facility is new or existing and whether it is a first or revised
 application.
- 10 The Waste Isolation Pilot Plant facility is an existing facility and is renewing its 11 Hazardous Waste Facility Permit # NM4890139088-TSDF.
- (h) For existing facilities, (1) a scale drawing of the facility showing the location of all past,
- 13 present, and future treatment, storage, and disposal areas; and (2) photographs of the facility

clearly delineating all existing structures; existing treatment, storage, and disposal areas; and

- 15 sites of future treatment, storage, and disposal areas.
- Please see Appendix 2, Appendix 3, and Appendix 4 for maps, drawings showing the location of all past, present, and future storage and disposal areas and photographs of the WIPP facility clearly delineating all existing structures; existing storage and disposal areas; and sites of future storage and disposal areas. The Permittees do not treat transuranic (**TRU**) mixed waste at the WIPP facility.
- (i) A description of the processes to be used for treating, storing, and disposing of hazardous
 waste, and the design capacity of these items.
- The Permittees propose no change in the manner in which they store or dispose of TRU mixed waste. The Permittees do not treat TRU mixed waste at the WIPP facility.
- (j) A specification of the hazardous wastes listed or designated under 40 CFR part 261 to be
 treated, stored, or disposed of at the facility, an estimate of the quantity of such wastes to be
 treated, stored, or disposed annually, and a general description of the processes to be used for
 such wastes.
- The Permittees propose no change from the existing list of Environmental Protection Agency (**EPA**) hazardous waste numbers. This information is found in the completed Form OMB# 2050-0024 for EPA hazardous waste numbers, estimates of annual quantity disposed per EPA hazardous waste number, and process codes. Other information required by the form is also provided.
- (k) A listing of all permits or construction approvals received or applied for under any of the
 following programs:
- 36 (1) Hazardous Waste Management program under RCRA.

- 1 (2) UIC program under the SWDA.
- 2 (3) NPDES program under the CWA.
- 3 (4) Prevention of Significant Deterioration (PSD) program under the Clean Air Act.
- 4 (5) Nonattainment program under the Clean Air Act.
- (6) National Emission Standards for Hazardous Pollutants (NESHAPS) preconstruction approval
 under the Clean Air Act.
- 7 (7) Ocean dumping permits under the Marine Protection Research and Sanctuaries Act.
- 8 (8) Dredge or fill permits under section 404 of the CWA.
- 9 (9) Other relevant environmental permits, including State permits.
- See Appendix 1, Active Environmental Permits and Approvals for the Waste Isolation
 Pilot Plant as of March 2020, for an updated list of other relevant environmental permits,
 including the number and status of individual permits.
- (I) A topographic map (or other map if a topographic map is unavailable) extending one mile
 beyond the property boundaries of the source, depicting the facility and each of its intake and
 discharge structures; each of its hazardous waste treatment, storage, or disposal facilities; each
 well where fluids from the facility are injected underground; and those wells, springs, other
 surface water bodies, and drinking water wells listed in public records or otherwise known to the
 applicant within ¼ mile of the facility property boundary.
- A topographic map extending one mile beyond the property boundary that depicts the facility and wells has been provided in Appendix 2. Because of the size of the facility and the scale of the map, it is not feasible to depict intake and discharge structures or each hazardous waste storage and disposal facility; however, they are shown in Appendix 3. Fluids from the facility are not injected underground. There are no springs, other surface water bodies, or drinking water wells listed in public records or otherwise known to the applicant within one-quarter of a mile of the facility property boundary.
- 26 (*m*) A brief description of the nature of the business.
- See Form OMB# 2050-0024, RCRA Subtitle C Site Identification Form and Hazardous
 Waste Permit Part A Form, Narrative to Item 6. Process Codes and Design Capacities.
- (n) For hazardous debris, a description of the debris category(ies) and contaminant
 category(ies) to be treated, stored, or disposed of at the facility.
- The debris waste category (S5000) includes waste that is at least 50 percent by volume materials that meet the New Mexico Administrative Code (NMAC) criteria for classification as debris (20.4.1.800 NMAC, incorporating 40 CFR §268.2). Debris means solid material exceeding a 2.36-inch (60 millimeter) particle size that is intended for disposal and that is: 1) a manufactured object, 2) plant or animal matter, or 3) natural geologic material. The debris category includes metal debris containing lead, inorganic

nonmetal debris, asbestos debris, combustible debris, graphite debris, heterogeneous
 debris, and composite filters, as well as other minor waste streams. Particles smaller
 than 2.36 inches (60 millimeters) in size may be considered debris if the debris is a
 manufactured object and if it is not a particle of homogeneous solids (S3000) or
 soils/gravel (S4000) material.

Form OMB# 2050-0024, RCRA Subtitle C Site Identification Form and Hazardous Waste Permit Part A Form

3

OMB# 2050-0024; Expires 05/31/2020

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM



1. Reason for Submittal (Select only one.)

	Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)						
	Submitting as a component of the Hazardous Waste Report for (Reporting Year)						
	Site was a TSD facility and/or generator of > 1,000 kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)						
	Notifying that regulated activity is no longer occurring at this Site						
	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities						
\mathbf{X}	Submitting a new or revised Part A Form						

2. Site EPA ID Number

Ν	М	4	8	9	0	1	3	9	0	8	8	
---	---	---	---	---	---	---	---	---	---	---	---	--

3. Site Name

Waste Isolation Pilot Plant

4. Site Location Address

Street Address	34 Louis Whitlock Road					
City, Town, or Village	Carlsb	ad	County	Eddy		
State NM		Country USA	Zip Code	88220		

5. Site Mailing Address

Street Address P.O. Bo		x 3090	
City, Town, or Village Carlsb		ıd	
State NM		Country USA	Zip Code 88221

6. Site Land Type

Private County	District	Federal	Tribal	Municipal	State	Other
----------------	----------	---------	--------	-----------	-------	-------

7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary) 56221	C.
В.	D.

Same as Location Address

EPA ID Number N M 4 8 9 0 1 3 9 0 8 8

OMB# 2050-0024; Expires 05/31/2020

8. Site Contact Information

Same as Location Address

First Na	me Gregory		MI	Last Name Sosson		
Title		Acting Manager	, Carlsbad Field Office (CBFO)			
Street Address		P.O. Box 3090				
City, Town, or Village		Carlsbad				
State	NM		Country USA	Zip Code 88221		
Email	Email Gregory.Sosson@cbfo.doe.gov					
Phone (575) 234-7300		0	Ext	Fax (575) 234-7694		

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner		Same as Location Address					
Full Name	Date Became Owner (mm/dd/yyyy)						
U.S. Department of Energy		05/18/1981					
Owner Type							
Private County District Rederal Tribal Municipal State Othe							
Street Address P.O. Box 3090							
City, Town, or Village Carlsbad							
State NM	Country USA	Zip Code 88221					
Email Gregory.Sosson@cbfo.doe.go	ον						
Phone (575) 234-7300	Ext	Fax (575) 234-7694					
Comments							

B. Name of Site's Legal Operator Same as Location Addres								
Full Name	Date Became Operator (mm/dd/yyyy)							
U.S. Department of Energy		05/18/1981						
Operator Type								
Private County District X Federal Tribal Municipal State Other								
Street Address P.O. Box 3090								
City, Town, or Village Carlsbad								
State NM	Country USA	Zip Code 88221						
Email Gregory.Sosson@cbfo.doe.go	v							
Phone (575) 234-7300	Ext	Fax (575) 234-7694						
Comments See Item 18, Comments, for additional operator.								

Page 2 of 8

EPA ID Number	Ν	М	4	8	9	0	1	3	9	0	8	8
---------------	---	---	---	---	---	---	---	---	---	---	---	---

OMB# 2050-0024; Expires 05/31/2020

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities

×Υ	N	1. Gen	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c							
		\boxtimes	a. LQG	 -Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material. 						
			b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.						
			c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.						
lf "Ye	es" above	e, indicat	e other ger	nerator activities in 2 and 3, as applicable.						
Υ	N			nerator (generates from a short-term or one-time event and not from on-going ", provide an explanation in the Comments section.						
×Υ	N	3. Mix	ed Waste (l	nazardous and radioactive) Generator						
×	N	4. Trea these a	ater, Storer activities.	or Disposer of Hazardous Waste—Note: A hazardous waste Part B permit is required for						
×Υ	N	5. Rec	eives Hazar	dous Waste from Off-site						
Υ	×Ν	6. Recycler of Hazardous Waste								
			a. Recycle	r who stores prior to recycling						
	b. Recycler who does not store prior to recycling									
Y	×Ν	7. Exen	npt Boiler a	nd/or Industrial Furnace—If "Yes", mark all that apply.						
			a. Small Q	uantity On-site Burner Exemption						
			b. Smeltin	g, Melting, and Refining Furnace Exemption						

B. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

D004	D009	D021	D029	D035	D040	F004
D005	D010	D022	D030	D036	D043	F005
D006	D011	D026	D032	D037	F001	F006
D007	D018	D027	D033	D038	F002	F007
D008	D019	D028	D034	D039	F003	See Item 18

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes. Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

	_											
EPA ID Number	Ν	М	4	8	9	0	1	3	9	0	8	8

11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.) A. Other Waste Activities

Y X N	1. Tran	sporter of Hazardous Waste—If "Yes", mark all that apply.
		a. Transporter
		b. Transfer Facility (at your site)
Y X N	2. Und	erground Injection Control
Y X N	3. Unit	ed States Importer of Hazardous Waste
Y X N	4. Reco	ognized Trader—If "Yes", mark all that apply.
		a. Importer
		b. Exporter
Y N	5. Imp that ap	orter/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If "Yes", mark all ply.
		a. Importer
		b. Exporter

B. Universal Waste Activities

Y N	1. Lar apply.	ge Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If "Yes" mark all that Note: Refer to your State regulations to determine what is regulated.
		a. Batteries
		b. Pesticides
		c. Mercury containing equipment
		d. Lamps
		e. Other (specify)
		f. Other (specify)
		g. Other (specify)
Y N	2. D activit	estination Facility for Universal Waste Note: A hazardous waste permit may be required for this y.

C. Used Oil Activities

Y X N 1. Use	ed Oil Transporter—If "Yes", mark all that apply.
	a. Transporter
	b. Transfer Facility (at your site)
Y X N 2. Use	ed Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
	a. Processor
	b. Re-refiner
Y X N ^{3. Off}	-Specification Used Oil Burner
Y X N 4. Use	ed Oil Fuel Marketer—If "Yes", mark all that apply.
	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
	b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID Number N M 4 8 9 0 1 3 9 0 8 8 OMB# 2050-0024; Expires 05/31/2020
--

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

Y X N	waste	ting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous s in laboratories—If "Yes", mark all that apply. Note: See the item-by-item instructions for definion of types of eligible academic entities.
		1. College or University
		2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
		3. Non-profit Institute that is owned by or has a formal written affiliation with a college or univer-
Y N	B. Wit	hdrawing from 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

N Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If "Yes", you must fill out the Addendum for Episodic Generator.

14. LQG Consolidation of VSQG Hazardous Waste

N Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If "Yes", you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

Y X N LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. Central Accumulation Area (CAA) or Entire Facility
B. Expected closure date: mm/dd/yyyy
C. Requesting new closure date: mm/dd/yyyy
D. Date closed : mm/dd/yyyy 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8) 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

16. Notification of Hazardous Secondary Material (HSM) Activity

□r D		A. Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop manag- ing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
□r [N	B. Are you notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate? If "Yes", you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

17. Electronic Manifest Broker

Y 🗙 N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest sys-	
	tem to obtain, complete, and transmit an electronic manifest under a contractual relationship with a haz-	
	ardous waste generator?	

EPA ID Number	Ν	М	4	8	9	0	1	3	9	0	8	8
---------------	---	---	---	---	---	---	---	---	---	---	---	---

18. Comments (include item number for each comment)

Section 9.B (continued):		
Full Name: Nuclear Waste Pa	artnership LLC	
Date Became Operator (mm/	dd/yyyy): 10/01/2012	
Operator Type: Private		
Street Address: P.O. Box 20	78	
City, Town, or Village: Carls	bad	
State: NM	Zip Code: 88221	
Email: Sean.Dunagan@wipp	.ws	
Phone: (575) 234-7400	Ext:	Fax: (575) 234-7046
Section 10.B (continued): F0	09, P015, P030, P098, P099, P1	06, P120, U002, U003, U019, U037, U043,
U044, U052, U070, U072, U07	78, U079, U103, U105, U108, U12	22, U133, U134, U151, U154, U159, U196,
	28, U239	

19. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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 fines and imprisonment for knowing violations. Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator or authorized representative Original Signature on File	Date (mm/dd/yyyy) 03/31/2020			
Printed Name (First, Middle Initial Last)	Title Acting Manager, Carlsbad Field Office (CBFO)			
Gregory Sosson				
Email Gregory.Sosson@cbfo.doe.gov				
Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)			
Original Signature on File	03/31/2020			
Duinted Neuro (First Middle Initial Lest)	Title Project Manager, Nuclear Waste			
Printed Name (First, Middle Initial Last)	Partnership LLC			

Page 7 of 8

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	Same as Site Contact	МІ	Last Name
Title			
Email			
Phone		Ext	Fax

2. Facility Permit Contact Mailing Address

Street Address Same as	Same as Site Mailing Address								
City, Town, or Village									
State	Country	Zip Code							

3. Facility Existence Date (mm/dd/yyyy)

05/18/1981	
------------	--

4. Other Environmental Permits

A. Permit Type	B. Permit Number											C. Description	
													See Appendix 1

5. Nature of Business

The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility for the receipt, unloading, and transfer of transuranic mixed waste from the surface of the site to the underground hazardous waste disposal units. Waste is emplaced in an underground geologic repository horizon located in a deep-bedded salt formation approximately 2,150 feet beneath the surface.



EPA ID Number Ν Μ 8 9 3 9 8 4 0 1 0 8

EPA ID Number	Ν	М	4	8	9	0	
---------------	---	---	---	---	---	---	--

OMB# 2050-0024; Expires 05/31/2020

6. Process Codes and Design Capacities

Line		A. Process Code			B. Process De	esign Capacity	C. Process Total	D. Hait Nama
Num	nber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name
	1	X	0	4	18000.00	С	002	Panels 1 and 2
	2	Х	0	4	18750.00	С	001	Panel 3
	3	Х	0	4	19106.00	С	001	Panel 4
	4	Х	0	4	19195.00	С	001	Panel 5
								See attached

8

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

1 3 9 0 8

		А.	EPA H	azard	ous	B. Estimated C. Unit of								D	. Pro	cesse	s
Line	No.		Wast	e No.		Annual Qty of Waste	Measure		(1) Process Codes						(2) Process Description (if code is not entered in 7.D1))		
	1	D	0	0	4	903	М	Х	0	4	S	0	1	S	0	1	
	2	D	0	0	5	484	М	Х	0	4	S	0	1	S	0	1	
	3	D	0	0	6	1819	М	Х	0	4	S	0	1	S	0	1	
	4	D	0	0	7	1248	М	Х	0	4	S	0	1	S	0	1	
	5	D	0	0	8	3246	М	Х	0	4	S	0	1	S	0	1	
	6	D	0	0	9	1727	М	Х	0	4	S	0	1	S	0	1	
	7	D	0	1	0	186	М	Х	0	4	S	0	1	S	0	1	
	8	D	0	1	1	1090	М	Х	0	4	S	0	1	S	0	1	
	9	D	0	1	8	749	М	Х	0	4	S	0	1	S	0	1	
1	0	D	0	1	9	761	М	Х	0	4	S	0	1	S	0	1	
																	See attached

8. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

10. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

11. Comments

See Hazardous Waste Permit Part A Form, Narrative to Item 6. Process Codes and Design Capacities.

Hazardous Waste Permit Part A Form

6. Process Codes and Design Capacities (continued)

Line Numbers		Α.	Proce	ess	B. Proces Capa	•	C. Process Total	D. Unit Name	
		Code		;	(1) Amount	(2) Unit of	Number of	D. Onit Name	
						Measure	Units		
	5	Х	0	4	19284.00	С	001	Panel 6	
	6	Х	0	4	19400.00	С	002	Panels 7 and 8	
	7	S 0		1	194.1	С	001	Waste Handling Building Unit	
	8	8 S 0		1	242.0	С	001	Parking Area Unit	

Page <u>8a</u>

Hazardous Waste Permit Part A Form

Narrative to Item 6. Process Codes and Design Capacities

The Waste Isolation Pilot Plant (**WIPP**) geologic repository is defined as a "miscellaneous unit" under 40 CFR §260.10: *Miscellaneous unit means a hazardous waste management unit where hazardous waste is treated, stored, or disposed of and that is not a container, tank, surface impoundment, pile, land treatment unit, landfill, incinerator, boiler, industrial furnace, underground injection well with appropriate technical standards under part 146 of this chapter, containment building, corrective action management unit, unit eligible for research, development, and demonstration permit under 40 CFR 270.65 or staging pile. The WIPP facility is a geologic repository designed for the disposal of defense-generated transuranic (TRU) waste. Some of the TRU wastes disposed of at the WIPP facility also meets the definition of debris waste. The debris categories include manufactured goods, biological materials, and naturally occurring geological materials. The WIPP facility has been divided into ten discrete hazardous waste disposal units (HWDUs), eight of which are permitted for disposal under 40 CFR Part 264, Subpart X, <i>Miscellaneous Units*.

For purposes of this application, all TRU waste is managed as though it were mixed. During the Disposal Phase of the facility, the emplaced TRU mixed waste volume will not exceed the design capacity specified in Item 6, *Process Codes and Design Capacities*. This volume is calculated based on the gross internal volumes of the outermost disposal containers and cannot exceed 151,135 cubic meters (**m**³) for Panels 1 through 8. The Land Withdrawal Act (**LWA**) TRU waste volume is tracked and reported by the DOE, internally, for the purposes of compliance with the WIPP LWA total capacity limit for TRU waste of 6.2 million cubic feet (175,564 m³), and is included for informational purposes in Permit Part 4, Table 4.1.1.

The process design capacities for each of the eight underground HWDUs in the geologic repository (i.e., miscellaneous unit) are shown in Item 6, Process Codes and Design Capacities. In addition, two Hazardous Waste Management Units (HWMUs) have been designated as container storage units (S01) in Item 6, Process Codes and Design Capacities. One is inside the Waste Handling Building (WHB) and consists of the Contact-Handled (CH) Bay, Waste Shaft Conveyance Loading Room, Waste Shaft Conveyance Entry Room, Remote-Handled (RH) Bay, Cask Unloading Room, Hot Cell, Transfer Cell, and Facility Cask Loading Room. This HWMU will be used for waste receipt, handling, and storage (including storage of derived waste) prior to emplacement in the underground geologic repository. No treatment or disposal will occur in this S01 HWMU. The capacity of this S01 unit for storage is 194.1 m³, based on 36 ten-drum overpacks on 18 facility pallets, four CH Packages at the TRUDOCKs, one standard waste box of derived waste, two loaded casks and one 55-gallon drum of derived waste in the RH Bay, one loaded cask in the Cask Unloading Room, 13 55-gallon drums in the Hot Cell, one canister in the Transfer Cell and one canister in the Facility Cask Unloading Room. The second S01 HWMU is the parking area outside the WHB where the CH and RH Package trailers and the road cask trailers will be parked awaiting waste handling operations. The capacity of this unit is 50 CH Packages and twelve RH Packages with a combined TRU mixed waste volume of 242 m³.

The HWMUs are shown in Appendix 3.

1

A CH TRU mixed waste volume of up to 148,500 m³ could be emplaced in Panels 1 to 8 and an RH TRU mixed waste volume up to 2,635 m³ could be emplaced in Panels 4 to 8 for a total of 151,135 m³, as shown in Item 6, Process Codes and Design Capacities.

Page 8b

Hazardous Waste Permit Part A Form

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1)) (continued)

		B.							D. Processes								
			A. E	EPA		Estimated	0.11.14.1										(2) Process
	ne	F	laza		S	Annual	C. Unit of				_		~				Description
Ν	0.		Vast			Qty of	Measure	(1) Process Codes								(if code is not	
						Waste											entered in 7.D1))
1	1	D	0	2	1	26	М	X 0 4 S 0 1 S 0						1			
1	2	D	0	2	2	1098	М	Х	0	4	S	0	1	S	0	1	
1	3	D	0	2	6	609	М	Х	0	4	S	0	1	S	0	1	
1	4	D	0	2	7	26	М	Х	0	4	S	0	1	S	0	1	
1	5	D	0	2	8	449	М	Х	0	4	S	0	1	S	0	1	
1	6	D	0	2	9	478	М	Х	0	4	S	0	1	S	0	1	
1	7	D	0	3	0	26	М	Х	0	4	S	0	1	S	0	1	
1	8	D	0	3	2	26	М	Х	0	4	S	0	1	S	0	1	
1	9	D	0	3	3	344	М	Х	0	4	S	0	1	S	0	1	
2	0	D	0	3	4	26	М	Х	0	4	S	0	1	S	0	1	
2	1	D	0	3	5	139	М	Х	0	4	S	0	1	S	0	1	
2	2	D	0	3	6	26	М	Х	0	4	S	0	1	S	0	1	
2	3	D	0	3	7	26	М	Х	0	4	S	0	1	S	0	1	
2	4	D	0	3	8	26	М	Х	0	4	S	0	1	S	0	1	
2	5	D	0	3	9	26	М	Х	0	4	S	0	1	S	0	1	
2	6	D	0	4	0	140	М	Х	0	4	S	0	1	S	0	1	
2	7	D	0	4	3	26	М	Х	0	4	S	0	1	S	0	1	
2	8	F	0	0	1	1891	М	Х	0	4	S	0	1	S	0	1	
2	9	F	0	0	2	1860	М	Х	0	4	S	0	1	S	0	1	
3	0	F	0	0	3	1593	М	Х	0	4	S	0	1	S	0	1	
3	1	F	0	0	4	26	М	Х	0	4	S	0	1	S	0	1	
3	2	F	0	0	5	1829	М	Х	0	4	S	0	1	S	0	1	
3	3	F	0	0	6	915	М	Х	0	4	S	0	1	S	0	1	
3	4	F	0	0	7	915	М	Х	0	4	S	0	1	S	0	1	
3	5	F	0	0	9	915	М	Х	0	4	S	0	1	S	0	1	
3	6	Ρ	0	1	5	945	М	Х	0	4	S	0	1	S	0	1	
3	7	Ρ	0	3	0	344	М	Х	0	4	S	0	1	S	0	1	
3	8	Ρ	0	9	8	344	М	Х	0	4	S	0	1	S	0	1	
3	9	Ρ	0	9	9	344	М	Х	0	4	S	0	1	S	0	1	
4	0	Ρ	1	0	6	344	М	Х	0	4	S	0	1	S	0	1	
4	1	Р	1	2	0	344	М	Х	0	4	S	0	1	S	0	1	
4	2	U	0	0	2	344	М	Х	0	4	S	0	1	S	0	1	
4	3	U	0	0	3	344	М	Х	0	4	S	0	1	S	0	1	
4	4	U	0	1	9	344	М	Х	0	4	S	0	1	S	0	1	
4	5	U	0	3	7	344	М	Х	0	4	S	0	1	S	0	1	
4	6	U	0	4	3	344	М	Х	0	4	S	0	1	S	0	1	
4	7	U	0	4	4	344	М	Х	0	4	S	0	1	S	0	1	
4	8	U	0	5	2	344	М	Х	0	4	S	0	1	S	0	1	
4	9	U	0	7	0	344	М	Х	0	4	S	0	1	S	0	1	
5	0	U	0	7	2	344	М	Х	0	4	S	0	1	S	0	1	

Page <u>8c</u>

1

Hazardous Waste Permit Part A Form

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1)) (continued)

						В.							D.	Prod	cess	es	
	ne o.		A. E Iaza Vast		-	Estimated Annual Qty of Waste	C. Unit of Measure	(1) Process Codes								(2) Process Description (if code is not entered in 7.D1))	
5	1	U	0	7	8	344	М	Х	0	4	S	0	1	S	0	1	
5	2	U	0	7	9	344	М	Х	0	4	S	0	1	S	0	1	
5	3	U	1	0	3	344	М	Х	0	4	S	0	1	S	0	1	
5	4	U	1	0	5	344	М	Х	0	4	S	0	1	S	0	1	
5	5	U	1	0	8	344	М	Х	0	4	S	0	1	S	0	1	
5	6	U	1	2	2	344	М	Х	0	4	S	0	1	S	0	1	
5	7	U	1	3	3	344	М	Х	0	4	S	0	1	S	0	1	
5	8	U	1	3	4	344	М	Х	0	4	S	0	1	S	0	1	
5	9	U	1	5	1	344	М	Х	0	4	S	0	1	S	0	1	
6	0	U	1	5	4	344	М	Х	0	4	S	0	1	S	0	1	
6	1	U	1	5	9	344	М	Х	0	4	S	0	1	S	0	1	
6	2	U	1	9	6	344	М	Х	0	4	S	0	1	S	0	1	
6	3	U	2	0	9	344	М	Х	0	4	S	0	1	S	0	1	
6	4	U	2	1	0	344	М	Х	0	4	S	0	1	S	0	1	
6	5	U	2	2	0	344	М	Х	0	4	S	0	1	S	0	1	
6	6	U	2	2	6	344	М	Х	0	4	S	0	1	S	0	1	
6	7	U	2	2	8	344	М	Х	0	4	S	0	1	S	0	1	
6	8	U	2	3	9	344	М	Х	0	4	S	0	1	S	0	1	

RCRA Part A Application Certification

- 1 NM4890139088
- 2

RCRA PART A APPLICATION CERTIFICATION

The U.S. Department of Energy (**DOE**), through its Carlsbad Field Office, has signed as "owner and operator," and Nuclear Waste Partnership LLC, the Management and Operating Contractor (**MOC**), has signed this application for the permitted facility as "co-operator."

6 The DOE has determined that dual signatures best reflect the actual apportionment of Resource 7 Conservation and Recovery Act (**RCRA**) responsibilities as follows:

The DOE's RCRA responsibilities are for policy, programmatic directives, funding and
 scheduling decisions, Waste Isolation Pilot Plant (WIPP) requirements of DOE generator
 sites, auditing, and oversight of all other parties engaged in work at the WIPP, as well as
 general oversight.

The MOC's RCRA responsibilities are for certain day-to-day operations (in accordance with general directions given by the DOE and in the Management and Operating Contract as part of its general oversight responsibility), including, but not limited to, the following: certain waste handling, monitoring, record keeping, certain data collection, reporting, technical advice, and contingency planning.

For purposes of the certification required by Title 20 of the New Mexico Administrative 17 Code, Chapter 4, Part 1 (20.4.1 NMAC), Subpart IX, 40 CFR §270.11(d), the DOE's and 18 the MOC's representatives certify, under penalty of law that this document and all 19 attachments were prepared under their direction or supervision in accordance with a 20 system designed to assure that gualified personnel properly gather and evaluate the 21 information submitted. Based on their inquiry of the person or persons who manage the 22 system, or those persons directly responsible for gathering the information, the information 23 submitted is, to the best of their knowledge and belief, true, accurate, and complete for 24 their respective areas of responsibility. We are aware that there are significant penalties 25 for submitting false information, including the possibility of fine and imprisonment for 26 knowing violations. 27

28	Owner and Operator Signature:	Original signed by Gregory Sosson
29	Title:	Acting Manager, Carlsbad Field Office (CBFO)
30	for:	U.S. Department of Energy
31	Date:	03/31/2020
32	Co-Operator Signature:	Original signed by Sean Dunagan
33	Title:	Project Manager
34	for:	Nuclear Waste Partnership LLC
35	Date:	03/31/2020
36		

1	Appendix 1
2	Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of
3	March 2020

Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of March 2020

	Granting Agency	Type of Permit	Permit/Right-of- Way Number	Granted/ Submitted	Expiration	Current Permit Status
1.	New Mexico Department of Game and Fish	Biotic Collection Permit	Authorization # 3293	02/02/2017	12/31/2019	Active Renewal in Progress
2.	New Mexico Environment Department Air Quality Bureau	NSR Streamline, Level 1, Minor Source, Air Permit	0310-M3	07/12/2019	None	Active
3.	New Mexico Environment Department Air Quality Bureau	Operating Permit for Two Backup Diesel Generators	310-M-2	12/07/1993	None	Active
4.	New Mexico Environment Department Ground Water Quality Bureau	Discharge Permit	DP-831	07/29/2014	07/29/2019	Active Renewal in Process
5.	New Mexico Environment Department Petroleum Storage Tank Bureau	Petroleum Storage Tank Registration Certificate	Registration Number 1248 Facility Number 31539	07/01/2019	06/30/2020	Active
6.	New Mexico Office of the State Engineer	Appropriation: WQSP-1 Well	C-2413	10/21/1996	None	Active
7.	New Mexico Office of the State Engineer	Appropriation: WQSP-2 Well	C-2414	10/21/1996	None	Active
8.	New Mexico Office of the State Engineer	Appropriation: WQSP-3 Well	C-2415	10/21/1996	None	Active
9.	New Mexico Office of the State Engineer	Appropriation: WQSP-4 Well	C-2416	10/21/1996	None	Active
10.	New Mexico Office of the State Engineer	Appropriation: WQSP-5 Well	C-2417	10/21/1996	None	Active
11.	New Mexico Office of the State Engineer	Appropriation: WQSP-6 Well	C-2418	10/21/1996	None	Active
12.	New Mexico Office of the State Engineer	Appropriation: WQSP-6a Well	C-2419	10/21/1996	None	Active
13.	New Mexico Office of the State Engineer	Monitoring Well H-19b0	C-2420	01/25/1995	None	Active
14.	New Mexico Office of the State Engineer	Monitoring Well H-19b2	C-2421	01/25/1995	None	Active
15.	New Mexico Office of the State Engineer	Monitoring Well H-19b3	C-2422	01/25/1995	None	Active
16.	New Mexico Office of the State Engineer	Monitoring Well H-19b4	C-2423	01/25/1995	None	Active

	Granting Agency	Type of Permit	Permit/Right-of- Way Number	Granted/ Submitted	Expiration	Current Permit Status
17.	New Mexico Office of the State Engineer	Monitoring Well H-19b5	C-2424	01/25/1995	None	Active
18.	New Mexico Office of the State Engineer	Monitoring Well H-19b6	C-2425	01/25/1995	None	Active
19.	New Mexico Office of the State Engineer	Monitoring Well H-19b7	C-2426	01/25/1995	None	Active
20.	New Mexico Office of the State Engineer	Monitoring Well CB-1 (Cabin Baby)	C-2664	07/30/1999	None	Active
21.	New Mexico Office of the State Engineer	Monitoring Well DOE-2	C-2682	04/17/2000	None	Active
22.	New Mexico Office of the State Engineer	Monitoring Well H-18	C-2683	04/17/2000	None	Active
23.	New Mexico Office of the State Engineer	Monitoring Well WIPP-18	C-2684	04/17/2000	None	Active
24.	New Mexico Office of the State Engineer	Monitoring Well H-15	C-2685	04/17/2000	None	Active
25.	New Mexico Office of the State Engineer	Monitoring Well H-11b2	C-2687	04/17/2000	None	Active
26.	New Mexico Office of the State Engineer	Monitoring Well C-2737	C-2737	09/27/2000	None	Active
27.	New Mexico Office of the State Engineer	Monitoring Well H-5bR	C-2745-POD2	02/07/2019	None	Active
28.	New Mexico Office of the State Engineer	Monitoring Well WIPP-13	C-2748	11/06/2000	None	Active
29.	New Mexico Office of the State Engineer	Monitoring Well H-6c	C-2750	11/06/2000	None	Active
30.	New Mexico Office of the State Engineer	Monitoring Well ERDA-9	C-2752	11/06/2000	None	Active
31.	New Mexico Office of the State Engineer	Monitoring Well H-16	C-2753	11/06/2000	None	Active
32.	New Mexico Office of the State Engineer	Monitoring Well H-2b1	C-2758	11/06/2000	None	Active
33.	New Mexico Office of the State Engineer	Monitoring Well H-3b1	C-2764	11/06/2000	None	Active
34.	New Mexico Office of the State Engineer	Monitoring Well H-14	C-2766	11/06/2000	None	Active
35.	New Mexico Office of the State Engineer	Monitoring Well H-11b4R	C-2769-POD2	05/16/2011	None	Active

	Granting Agency	Type of Permit	Permit/Right-of- Way Number	Granted/ Submitted	Expiration	Current Permit Status
36.	New Mexico Office of the State Engineer	Monitoring Well H-4c	C-2776	11/06/2000	None	Active
37.	New Mexico Office of the State Engineer	Monitoring Well H-10a	C-2779	11/06/2000	None	Active
38.	New Mexico Office of the State Engineer	Monitoring Well H-8a	C-2780	11/06/2000	None	Active
39.	New Mexico Office of the State Engineer	Monitoring Well H-9bR	C-2783-POD2	07/14/2010	None	Active
40.	New Mexico Office of the State Engineer	Monitoring Well H-9c	C-2784	11/06/2000	None	Active
41.	New Mexico Office of the State Engineer	Monitoring Well C-2811	C-2811	03/02/2001	None	Active
42.	New Mexico Office of the State Engineer	Monitoring Well SNL-2	C-2948	02/14/2003	None	Active
43.	New Mexico Office of the State Engineer	Monitoring Well SNL-3	C-2949	02/14/2003	None	Active
44.	New Mexico Office of the State Engineer	Monitoring Well SNL-9	C-2950	02/14/2003	None	Active
45.	New Mexico Office of the State Engineer	Monitoring Well SNL-1	C-2953	02/25/2003	None	Active
46.	New Mexico Office of the State Engineer	Monitoring Well SNL-12	C-2954	02/25/2003	None	Active
47.	New Mexico Office of the State Engineer	Monitoring Well SNL-5	C-3002	10/01/2003	None	Active
48.	New Mexico Office of the State Engineer	Monitoring Well IMC-461	C-3015	11/25/2003	None	Active
49.	New Mexico Office of the State Engineer	Monitoring Well WIPP-11R	C-3112-POD2	02/07/2019	None	Active
50.	New Mexico Office of the State Engineer	Monitoring Well SNL-13	C-3139	12/17/2004	None	Active
51.	New Mexico Office of the State Engineer	Monitoring Well SNL-14	C-3140	12/17/2004	None	Active
52.	New Mexico Office of the State Engineer	Monitoring Well SNL-8	C-3150	02/10/2005	None	Active
53.	New Mexico Office of the State Engineer	Monitoring Well SNL-6	C-3151	02/10/2005	None	Active
54.	New Mexico Office of the State Engineer	Monitoring Well SNL-15	C-3152	02/10/2005	None	Active

	Granting Agency	Type of Permit	Permit/Right-of- Way Number	Granted/ Submitted	Expiration	Current Permit Status
55.	New Mexico Office of the State Engineer	Monitoring Well H-3d	C-3207	11/06/2000	None	Active
56.	New Mexico Office of the State Engineer	Monitoring Well SNL-16	C-3220	07/26/2005	None	Active
57.	New Mexico Office of the State Engineer	Monitoring Well SNL-10	C-3221	07/26/2005	None	Active
58.	New Mexico Office of the State Engineer	Monitoring Well SNL-17	C-3222	07/26/2005	None	Active
59.	New Mexico Office of the State Engineer	Monitoring Well SNL-18	C-3233	10/06/2005	None	Active
60.	New Mexico Office of the State Engineer	Monitoring Well SNL-19	C-3234	10/06/2005	None	Active
61.	New Mexico Office of the State Engineer	Monitoring Well H-15R	C-3361	12/27/2007	None	Active
62.	New Mexico Office of the State Engineer	Monitoring Well H-6bR	C-3362	12/27/2007	None	Active
63.	New Mexico Office of the State Engineer	Monitoring Well H-4bR	C-3404	01/13/2009	None	Active
64.	New Mexico Office of the State Engineer	Monitoring Well AEC-7R	C-3635	04/24/2013	None	Active
65.	New Mexico Office of the State Engineer	Monitoring Well H-12R	C-3749-POD1	06/24/2014	None	Active
66.	New Mexico Office of the State Engineer	Monitoring Well H-10cR	C-3851	07/09/2015	None	Active
67.	New Mexico State Land Office	Right-of-Way for Dosimetry and Aerosol Sampling Site, Angel Ranch	RW-22789	10/03/1985	10/03/2020	Active
68.	New Mexico State Land Office	Right-of-Way Easement for Accessing State Trust Lands in Eddy & Lea Counties	RW-25430	09/28/2004	10/31/2018	Active Renewal in Process
69.	New Mexico State Land Office	Right-of-Way Easement for SNL-1 Access Road and Well Pad	RW-28535	08/27/2003	08/27/2038	Active
70.	New Mexico State Land Office	Right-of-Way Easement for SNL-3 Access Road and Well Pad	RW-28537	08/27/2003	08/27/2038	Active
71.	New Mexico State Land Office	Water Monitoring Easement for SNL-3	WM-119	07/20/2018	08/21/2022	Active
72.	New Mexico State Land Office	Water Monitoring Easement for SNL-1	WM-120	07/20/2018	08/21/2022	Active
73.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for 115-Kilovolt Electric Transmission Line	NM043203	10/19/1981 (Xcel Energy)	12/31/2040	Active

	Granting Agency	Type of Permit	Permit/Right-of- Way Number	Granted/ Submitted	Expiration	Current Permit Status
74.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Telephone Cable	NM046092	09/04/1981 (Valor Telecom)	12/31/2040	Active
75.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Domestic Water Pipeline	NM053809	05/15/2006 (City of Carlsbad, NM)	In Perpetuity	Active
76.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for the North Access Road	NM055676	08/23/1983	In Perpetuity	Active
77.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for WIPP Railroad Spur and Maintenance Road	NM055699	09/27/1983	In Perpetuity	Active
78.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Mosaic (Duval Mine Site-Nash Draw) Telephone Line	NM060174	03/08/1985 (Valor Telecom)	03/08/2035	Active
79.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Dosimetry and Aerosol Sampling Sites	NM063136	07/03/1986	12/31/2040	Active
80.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Seven Subsidence Monuments	NM065801	11/07/1986	None	Active
81.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for 69-Kilovolt Electric Distribution Line	NM091163	02/16/1994 (Xcel Energy)	02/15/2024	Active
82.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for South Access Road Fence	NM094304	03/15/1995	None	Active
83.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Well C- 2664 (CB-1, Cabin Baby)	NM107944	04/23/2002	04/23/2032	Active
84.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Groundwater Monitoring Wells/Pads	NM108365	08/30/2002	08/30/2032	Active
85.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way Grant for SNL-2 Well Pad	NM109174	04/15/2003	04/15/2033	Active
86.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way Grant for SNL-9 Well Pad	NM109175	04/15/2003	04/15/2033	Active

	Granting Agency	Type of Permit	Permit/Right-of- Way Number	Granted/ Submitted	Expiration	Current Permit Status
87.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way Grant for SNL-12 Well Pad	NM109176	04/15/2003	04/15/2033	Active
88.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way Grant for SNL-1 Access Road	NM109177	06/17/2003	06/17/2033	Active
89.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way Grant for SNL-11 (Never Drilled) and SNL-5 Well Pads and Access Road	NM110735	10/16/2003	10/16/2033	Active
90.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Buried Fiber-Optic Communication Line	NM113339	08/09/2005 (Valor Telecom)	12/31/2034	Active
91.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way Grant for SNL-18 and SNL-19 Well Pads	NM115315	03/21/2006	12/31/2035	Active
92.	U.S. Department of the Interior, Bureau of Land Management	Seismic Monitoring Stations	NM120413	07/10/2008	12/31/2037	Active
93.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for South Access Road (Includes 1-Acre Area in NW1/4, NW1/4 Section 6, T23S, R31E)	NM123703	01/27/2010	12/31/2039	Active
94.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way Grant for H-12R Access Road and Well Pad	NM131916	06/19/2014	12/31/2043	Active
95.	U.S. Department of the Interior, Bureau of Land Management	Right-of-Way for Wells C-2725 (H- 4A), C-2775 (H-4B), & C-2776 (H- 4C)	NM-6-5 Cooperative Agreement	04/27/1978	None	Active
96.	U.S. Environmental Protection Agency, Region 6	Conditions of Approval for Disposal of PCB/TRU and PCB/TRU Mixed Waste at the U.S. Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Carlsbad, New Mexico	N/A	03/19/2018	03/19/2023	Active
97.	U.S. Fish and Wildlife Service	Special Purpose – Relocate	MB155189-0	05/01/2017	12/31/2020	Active

Appendix 2
Maps

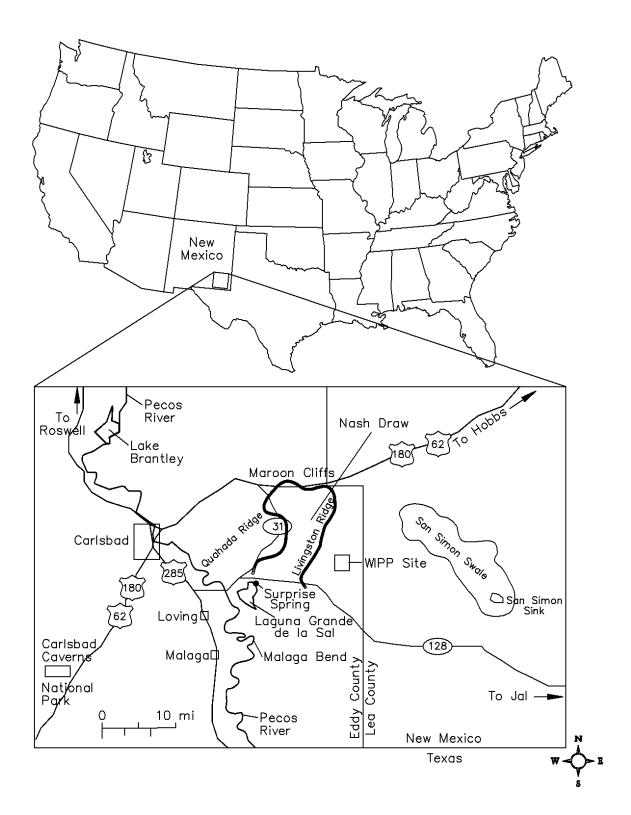


Figure 2-1 General Location of the WIPP Facility

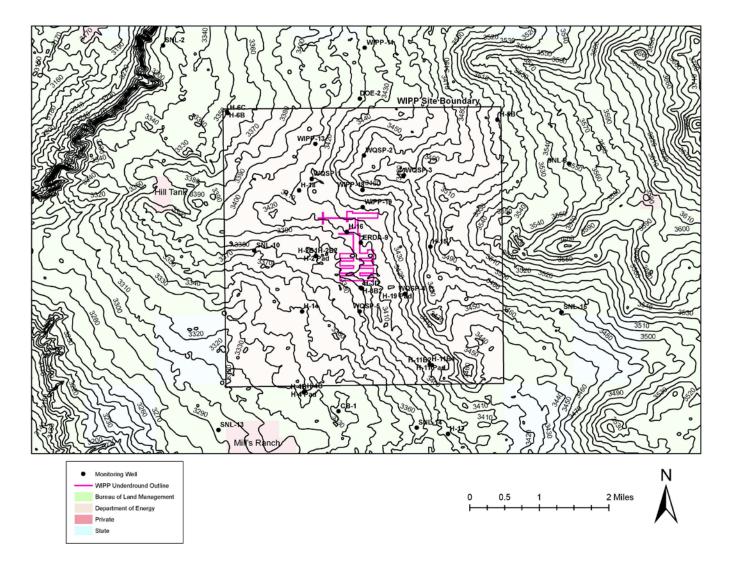
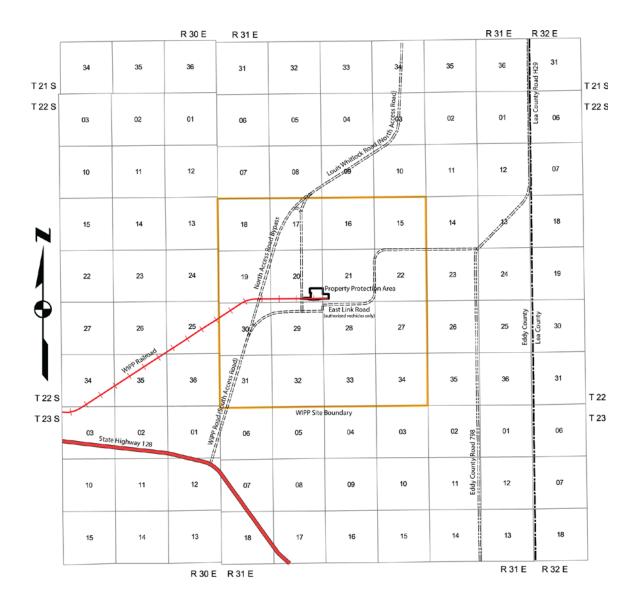


Figure 2-2 Topographic Map with Underground Facilities (March 2020)



LEGEND

- WIPP Site Boundary
- ----- Railroad

- —— State Highway
- ----- Other Roads



Appendix 3 Facilities

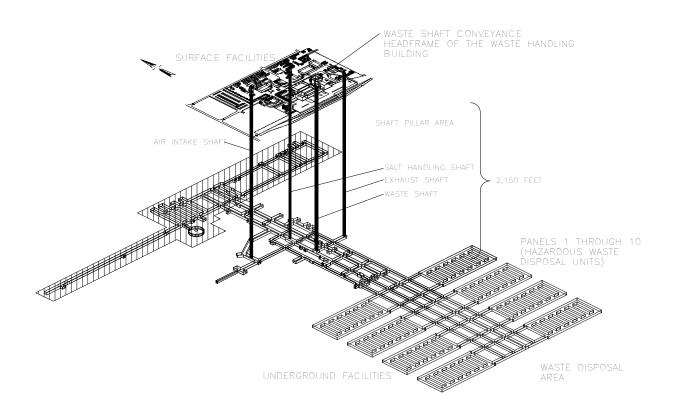


Figure 3-1 Spatial View of the WIPP Facility

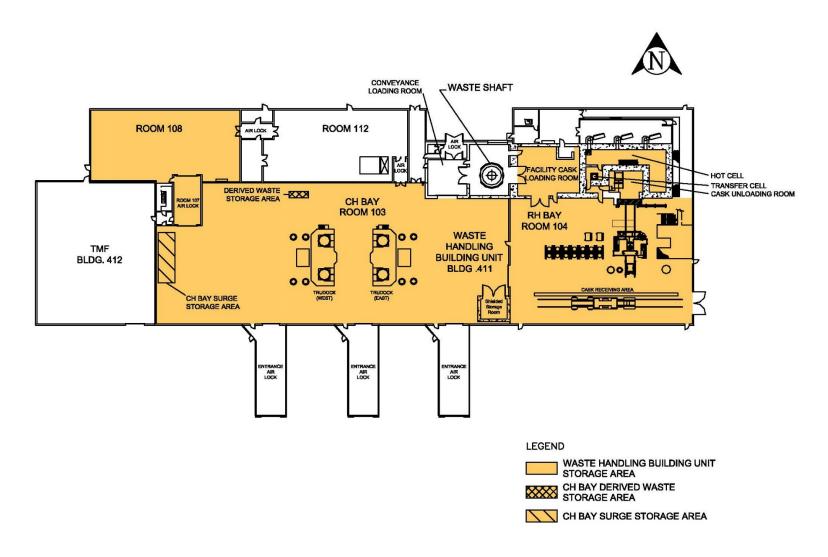


Figure 3-2 Waste Handling Building Unit- TRU Mixed Waste Container Storage and Surge Areas

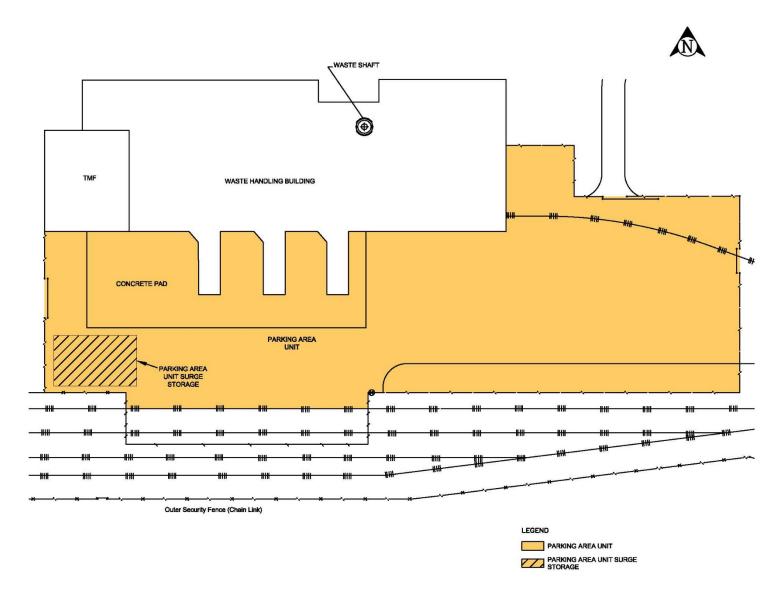


Figure 3-3 Parking Area Unit – TRU Mixed Waste Container Storage and Surge Areas

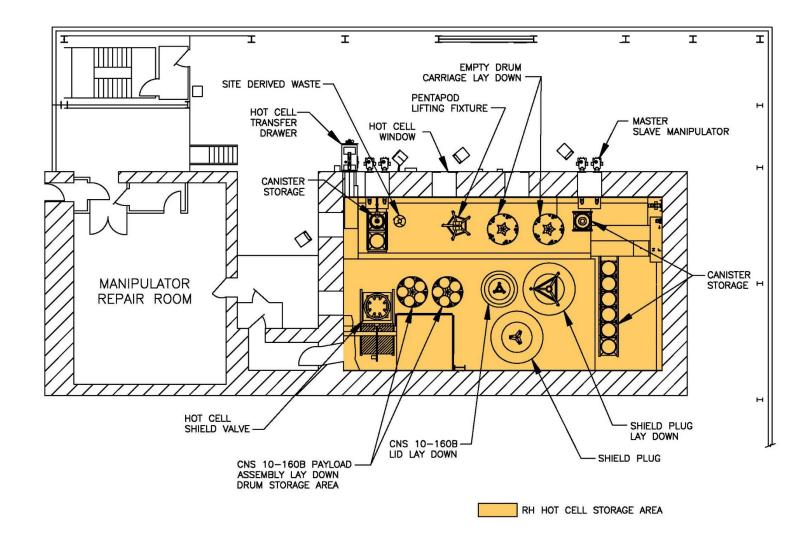


Figure 3-4 RH Hot Cell Storage Area



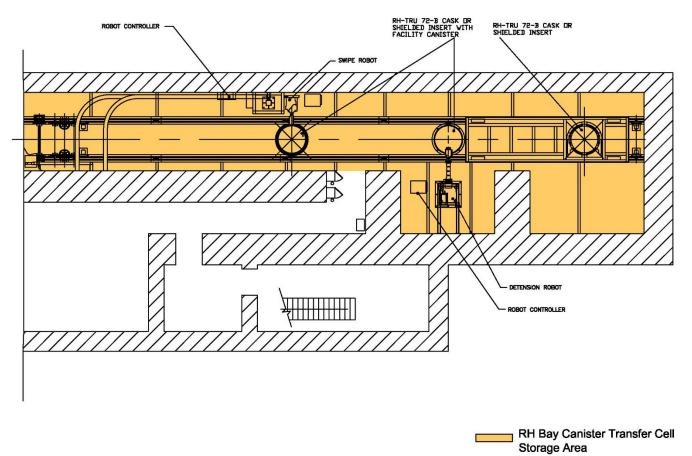


Figure 3-5 RH Canister Transfer Cell Storage Area and Waste Transport Route

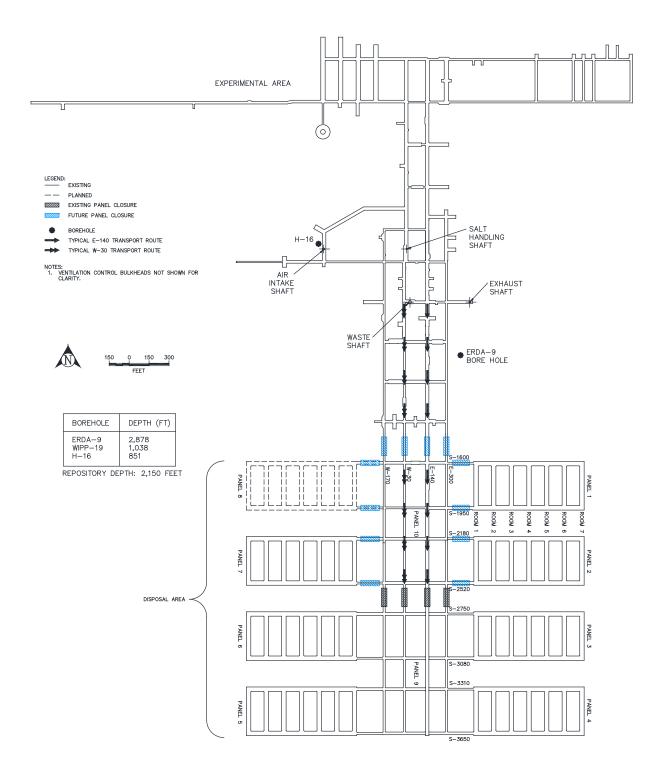
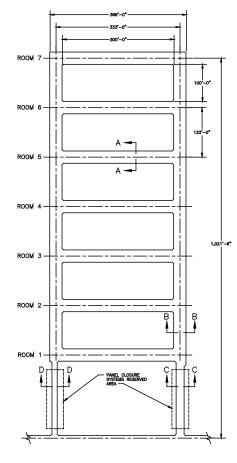
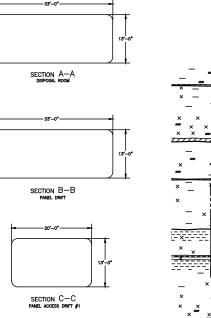


Figure 3-6 Repository Horizon



UNDERGROUND WASTE DISPOSAL PANEL

1





DISPOSAL HORIZON

×_

_

×

x

×

33'-0"

TYPICAL DISPOSAL ROOM ×

13'-0'

_

<u>×</u> ×

osal Horizon Envelope

ANHYDRITE "g"/ CLAY H

DRITE "b"/

ED 139

CLAY

-x-----

×

TYPICAL EXCAVATION SECTIONS

Figure 3-7 Typical Disposal Panel

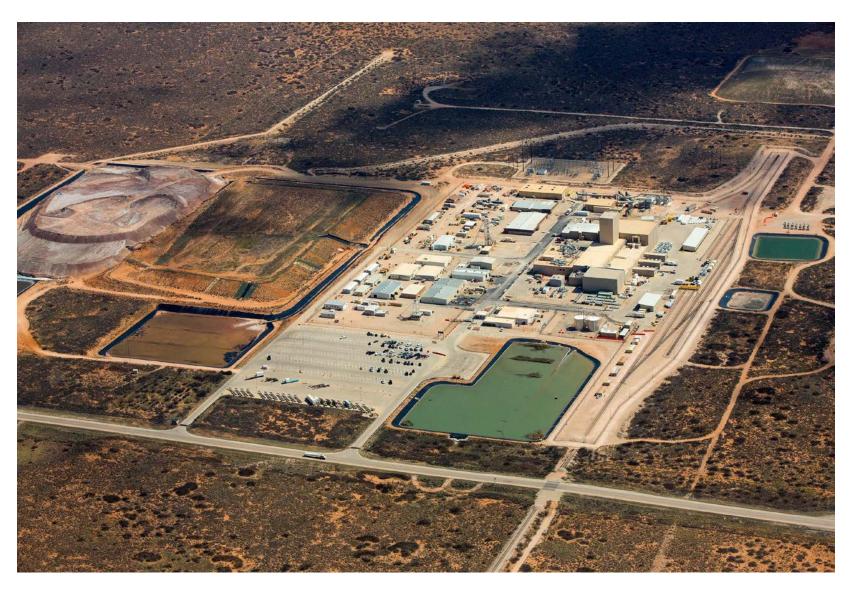


Figure 4-1 Aerial Photograph of the Waste Isolation Pilot Plant



Figure 4-2 Underground - Panel 7 - Panel Entry

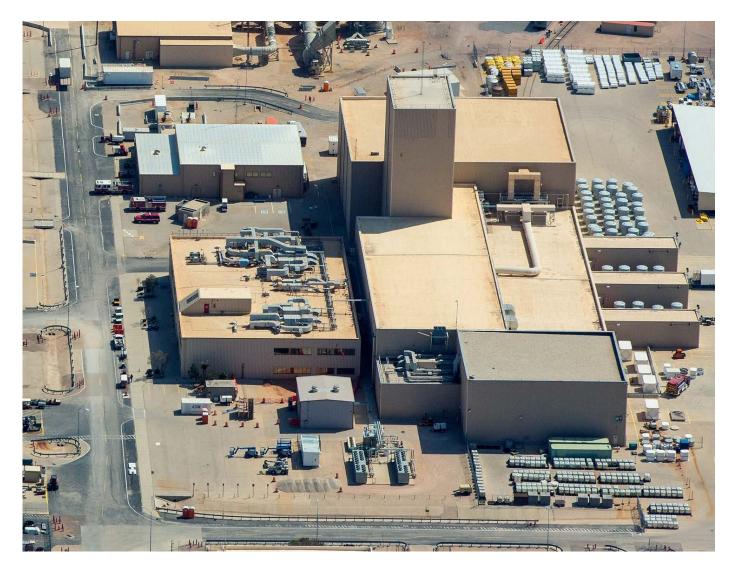


Figure 4-3 Aerial Photograph of the Waste Handling Building



Figure 4-4 TRUDOCK (East) in CH Bay of the Waste Handling Building



Figure 4-5 NE Corner of CH Bay of the Waste Handling Building



Figure 4-6 Waste Shaft Conveyance - Loading Facility Pallet with CH TRU Waste, Waste Handling Building



Figure 4-7 RH Bay



Figure 4-8 Cask Unloading Room and Bridge Crane

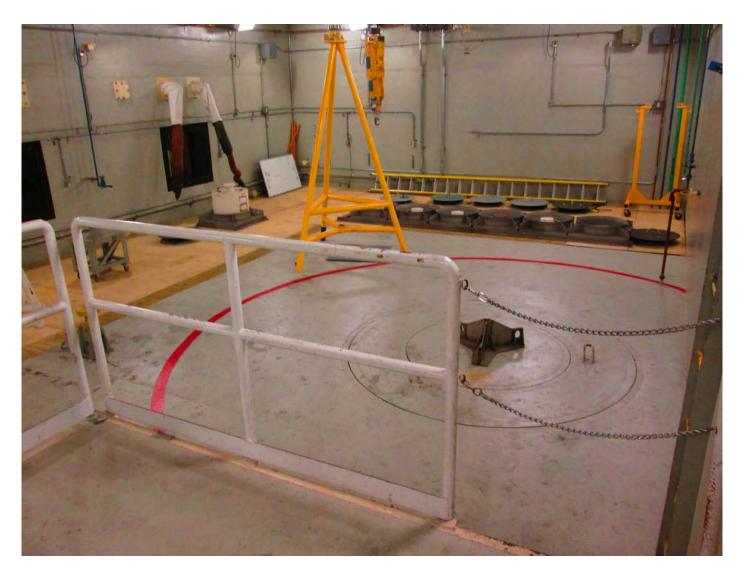


Figure 4-9 Hot Cell



Figure 4-10 Transfer Cell

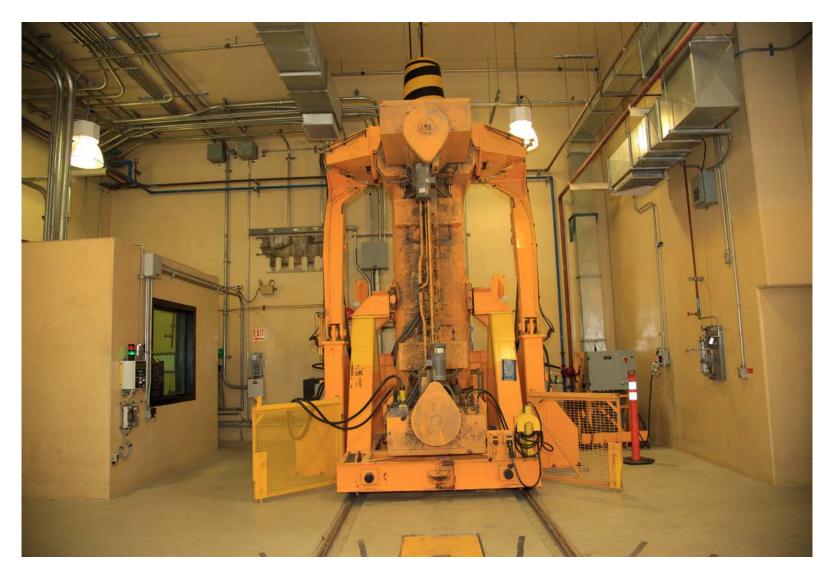


Figure 4-11 Facility Cask Loading Room and Facility Cask Rotating Device

RENEWAL APPLICATION HAZARDOUS WASTE FACILITY PERMIT APPLICATION PART B

RENEWAL APPLICATION HAZARDOUS WASTE FACILITY PERMIT APPLICATION PART B

TABLE OF CONTENTS

Information Required for the WIPP Facility Ten-Year Renewal Application, Part B	2
Maps and Illustrations	28
Maps and Illustrations Crosswalk	29
Demographics	36
Drawings	50
Public Participation Information	67
Attachment 1 Public Notice of Pre-Application Meetings Attachment 2 Evidence of Required Forms of Public Notice Attachment 3 Public Participation Information Required for Part B Application Attachment 4 Written Comments Received by the Permittees after Pre-Application M by February 20, 2020 Attachment 5 Written Comments Received by the NMED after Pre-Application Meetin February 20, 2020	72 80 leetings 112 ngs by

1 Information Required for the WIPP Facility Ten-Year Renewal Application, Part B

1 Information Required for the WIPP Facility Ten-Year Renewal Application, Part B

The New Mexico Hazardous Waste Act requires general and specific information when reapplying for a hazardous waste facility permit. General and specific information requirements are addressed in the order they appear in the federal regulations as adopted by the New Mexico Hazardous Waste Management regulations and are identified by the number of the federal hazardous waste management citation.

7 §270.14 Contents of part B: General requirements

(a) Part B of the permit application consists of the general information requirements of this 8 section and the specific information requirements in §§270.14 through 270.29 applicable to the 9 facility. The part B information requirements presented in §§270.14 through 270.29 reflect the 10 standards promulgated in 40 CFR part 264. These information requirements are necessary in 11 order for the New Mexico Environment Department (NMED) to determine compliance with the 12 part 264 standards. If owners and operators of hazardous waste management (HWM) facilities 13 can demonstrate that the information prescribed in the part B cannot be provided to the extent 14 required, the Secretary of the NMED may make allowance for submission of such information 15 on a case-by-case basis. Information required in the part B shall be submitted to the Secretary 16 and signed in accordance with the requirements of §270.11. Certain technical data, such as 17 design drawings and specifications, and engineering studies shall be certified by a qualified 18 Professional Engineer. For post-closure permits, only the information specified in §270.28 is 19 required in part B of the permit application. 20

The Permittees have determined that none of the information submitted in this Renewal Application requires a certification beyond that required by §270.11.

(b) General information requirements. The following information is required for all HWM
 facilities, except as §264.1 provides otherwise:

- 25 (1) A general description of the facility.
- There are no significant changes being proposed to the description of the facility in the
 Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Permit # NM489019088 TSDF, as modified in accordance with NMAC 20.4.1.901 incorporating §40 CFR 270.42.
 See Renewal Application Attachments A, A1, and A2 for a description of the facility.

In this Renewal Application, the Permittees are seeking authorization to continue the disposal of transuranic (**TRU**) mixed waste at the Waste Isolation Pilot Plant (**WIPP**) facility. Waste disposal has occurred in the underground portion of the WIPP facility in areas designated as Panels 1 through 7. Currently, TRU mixed waste disposal is permitted in Panels 1 through 8; Panel 8 is currently being constructed. Each panel consists of seven rooms and two access drifts mined in a salt bed approximately 2,150 feet (**ft**) (655 meters (**m**)) below the surface. The legal description of the facility is:

- Township 22 South, Range 31 East;
- 38 o Sections 15 to 22
- o Sections 27 to 34

During the term of the Permit, the cumulative volume of contact-handled (**CH**) TRU mixed waste emplaced in the repository will not exceed 5,244,900 cubic feet (**ft**³) (148,500 cubic meters (**m**³)) and the cumulative volume of remote-handled (**RH**) TRU mixed waste shall not exceed 93,050 ft³ (2,635 m³). No additional disposal capacity is being requested at this time.

Descriptions of the containers to be used and associated operations during the Disposal 6 Phase are presented in Renewal Application Attachment A1, Container Storage. The 7 TRU mixed waste that will be disposed at the WIPP facility results primarily from 8 activities related to the reprocessing of plutonium-bearing reactor fuel and fabrication of 9 plutonium-bearing weapons, as well as from research and development. This TRU 10 mixed waste consists largely of such items as paper, cloth, and other organic material: 11 laboratory glassware and utensils; tools; scrap metal; shielding; and solidified sludges 12 from the treatment of wastewater. Much of this TRU mixed waste is also contaminated 13 with substances that are defined as hazardous under 20.4.1.200 NMAC. 14

(2) Chemical and physical analyses of the hazardous waste and hazardous debris to be
 handled at the facility. At a minimum, these analyses shall contain all the information which
 must be known to treat, store, or dispose of the wastes properly in accordance with part 264 of
 this chapter.

The Permittees are proposing no significant changes to the Waste Analysis Plan (**WAP**). The Permittees are not proposing a change to the list of Environmental Protection Agency (**EPA**) hazardous waste numbers for disposal at the WIPP facility. The Permittees are not proposing to change the chemical or physical characteristics of waste expected for disposal at the WIPP facility.

- Please see Renewal Application Waste Analysis Plan (Attachments C and C1 through
 C7) for complete information on the chemical and physical analysis of TRU mixed waste.
- The Permittees will continue to ensure that there are no incompatible wastes by 26 ensuring that only waste with acceptable EPA hazardous waste numbers are shipped to 27 the WIPP facility and that there are no prohibited items as specified in the Treatment, 28 Storage, Disposal Facility-Waste Acceptance Criteria (TSDF-WAC), such as liquids in 29 excess of TSDF-WAC limits; compressed gases; or ignitable, corrosive, or reactive 30 waste. Identification of the chemical and physical properties of the waste will be done by 31 use of Acceptable Knowledge, visual examination, and/or radiography. The Permittees 32 will continue to review Waste Stream Profile Forms to ensure that the waste contains no 33 ignitable, corrosive, or reactive waste; and that only allowed EPA hazardous waste 34 numbers are accepted for storage and disposal at the WIPP facility. The Permittees will 35 continue to monitor airborne volatile organic compounds (VOCs) underground and on 36 the surface to demonstrate compliance with the environmental performance standards. 37
- (3) A copy of the waste analysis plan required by §264.13(b) and, if applicable §264.13(c).
- The Permittees are providing a copy of their waste analysis plan as required by §264.13 in Renewal Application Attachments C and C1 through C7.
- (4) A description of the security procedures and equipment required by §264.14, or a
- *justification demonstrating the reasons for requesting a waiver of this requirement.*

The Permittees propose no significant changes to security procedures and equipment as
 detailed in the Renewal Application Addendum E1, *Security*; and Attachment E,
 Inspection Schedule, Process and Forms, Table E-1, *Inspection Schedule/Procedures*.

(5) A copy of the general inspection schedule required by §264.15(b) of this part. Include where
applicable, as part of the inspection schedule, specific requirements in §§264.174, 264.193(i),
264.195, 264.226, 264.254, 264.273, 264.303, 264.602, 264.1033, 264.1052, 264.1053,
264.1058, 264.1084, 264.1085, 264.1086, and 264.1088 of this part.

- The Permittees propose no significant changes to the general inspection schedule. In 8 accordance with 40 CFR §264.602, §264.15(b), and the weekly inspection requirements 9 of §264.174, the Permittees inspect the WIPP facility for malfunctions and deterioration, 10 operator errors, and discharges which may cause or lead to a release of hazardous 11 waste constituents to the environment or threaten human health. The general inspection 12 schedule is identified in Renewal Application Attachment E, Inspection Schedule, 13 Process and Forms; Renewal Application Table E-1, Inspection Schedule/Procedures; 14 Renewal Application Table E-1a, RH TRU Mixed Waste Inspection 15
- 16 Schedule/Procedures; and Renewal Application Table E-2, *Monitoring Schedule*.

The Permittees do not manage hazardous waste in tanks, surface impoundments, waste piles, by land treatment, or in landfills, have no process vents, have no equipment that contains or contacts hazardous waste, and are exempt from Subpart CC standards for containers, therefore the requirements of §§264.193(i), 264.195, 264.226, 264.254, 264.273, 264.1033, 264.1052, 264.1053, 264.1058, 264.1084, 264.1085, 264.1086, and 264.1088 are not applicable.

- (6) A justification of any request for a waiver(s) of the preparedness and prevention
 requirements of part 264, subpart C.
- No waivers of the preparedness and prevention requirements of Part 264, Subpart C are being sought by the Permittees.
- (7) A copy of the contingency plan required by part 264, subpart D. Note: Include, where
 applicable, as part of the contingency plan, specific requirements in §§264.227, 264.255, and
 264.200.

A copy of Renewal Application Attachment D, *RCRA Contingency Plan*, is included. The Permittees do not manage hazardous waste in surface impoundments at the WIPP facility; therefore, the requirements of §264.227 are not applicable. The Permittees do not manage waste in waste piles at the WIPP facility; therefore, the requirements of §264.255 are not applicable. The Permittees do not manage waste in tanks at the WIPP facility; therefore, the requirements of §264.200 are not applicable.

- (8) A description of procedures, structures, or equipment used at the facility to:
- 37 (i) Prevent hazards in unloading operations (for example, ramps, special forklifts);
- The Permittees propose no significant changes in the manner in which they prevent hazards in unloading operations as detailed in Renewal Application Addendum D1,

- Preparedness and Prevention, Section D1-2a, Unloading Operations; Attachment A1,
 Container Storage; and Attachment A2, Geologic Repository.
- (ii) Prevent runoff from hazardous waste handling areas to other areas of the facility or
 environment, or to prevent flooding (for example, berms, dikes, trenches);
- 5 The Permittees propose no change in the manner in which they prevent runoff from 6 hazardous waste handling areas to other areas of the facility or environment or to 7 prevent flooding as described in Renewal Application Addendum D1, *Preparedness and*
- 8 *Prevention*, Section D1 2b, *Runoff*.
- 9 (iii) Prevent contamination of water supplies;

10 The Permittees propose no change in the manner in which they prevent contamination 11 of water supplies as detailed in Renewal Application Addendum D1, *Preparedness and* 12 *Prevention*, Section D1-2c, *Water Supplies*.

13 *(iv) Mitigate effects of equipment failure and power outages;*

The Permittees propose no change in the manner in which they mitigate effects of equipment failure and power outages as detailed in Renewal Application Addendum D1,

- equipment failure and power outages as detailed in Renewal Application Addend
 Preparedness and Prevention, Section D1-2d, Equipment and Power Failure.
- (v) Prevent undue exposure of personnel to hazardous waste (for example, protective clothing);

The Permittees propose no change in the manner in which they prevent undue exposure of personnel to hazardous waste as detailed in Renewal Application Addendum D1.

- 20 Preparedness and Prevention, Section D1-2e, Personnel Protection.
- 21 (vi) Prevent releases to atmosphere.
- The Permittees propose no change in the manner in which they prevent releases to the atmosphere as detailed in Renewal Application Addendum D1, *Preparedness and Prevention*, Section D1 2f, *Releases to the Atmosphere*.
- (9) A description of precautions to prevent accidental ignition or reaction of ignitable, reactive, or
 incompatible wastes as required to demonstrate compliance with §264.17, including
 documentation demonstrating compliance with §264.17(c).
- The Permittees propose no change in the manner in which they take precautions to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes as required to demonstrate compliance with §264.17 including documentation demonstrating compliance with §264.17(c) as detailed in Renewal Application
- Addendum D1, Preparedness and Prevention, Section D1-2g, *Flammable Gas*
- 33 Concentration Control, and Section D1-2f, Prevention of Reaction of Ignitable, Reactive, 34 and Incompatible Waste.
- 35 (10) Traffic pattern, estimated volume (number, types of vehicles) and control (for example,
- 36 show turns across traffic lanes, and stacking lanes (if appropriate); describe access road
- surfacing and load bearing capacity; show traffic control signals).

- 1 The Permittees propose no change in traffic patterns and no change is proposed in 2 access road surfacing and load bearing capacity or traffic control signals as detailed in 3 Renewal Application Attachment A3, *Traffic Patterns*.
- 4 (11) Facility location information;
- (i) In order to determine the applicability of the seismic standard [§264.18(a)] the owner or of a
 new facility must identify the political jurisdiction (e.g., county, township, or election district) in
 which the facility is proposed to be located.
- 8 [Comment: If the county or election district is not listed in appendix VI of part 264, no further 9 information is required to demonstrate compliance with §264.18(a).]

There is no change in the applicability of the seismic standard. The WIPP facility is
 located in Eddy County, New Mexico. Eddy County is not listed in Part 264, Appendix VI;
 therefore, no further information is required to demonstrate compliance with § 264.18(a).

(ii) If the facility is proposed to be located in an area listed in appendix VI of part 264, the owner

or operator shall demonstrate compliance with the seismic standard. This demonstration may be

15 made using either published geologic data or data obtained from field investigations carried out

by the applicant. The information provided must be of such quality to be acceptable to

geologists experienced in identifying and evaluating seismic activity. The information submitted
 must show that either:

- (A) No faults which have had displacement in Holocene time are present, or no lineations which
- suggest the presence of a fault (which have displacement in Holocene time) within 3,000 feet of a facility are present, based on data from:
- 22 (1) Published geologic studies,
- (2) Aerial reconnaissance of the area within a five-mile radius from the facility.
- (3) An analysis of aerial photographs covering a 3,000 foot radius of the facility, and

(4) If needed to clarify the above data, a reconnaissance based on walking portions of the area
 within 3,000 feet of the facility, or

- The WIPP facility is located in Eddy County, New Mexico. Eddy County is not listed in
 Part 264, Appendix VI; therefore, no further information is required to demonstrate
 compliance with § 264.18(a).
- (B) If faults (to include lineations) which have had displacement in Holocene time are present 30 within 3,000 feet of a facility, no faults pass within 200 feet of the portions of the facility where 31 treatment, storage, or disposal of hazardous waste will be conducted, based on data from a 32 comprehensive geologic analysis of the site. Unless a site analysis is otherwise conclusive 33 concerning the absence of faults within 200 feet of such portions of the facility data shall be 34 obtained from a subsurface exploration (trenching) of the area within a distance no less than 35 200 feet from portions of the facility where treatment, storage, or disposal of hazardous waste 36 will be conducted. Such trenching shall be performed in a direction that is perpendicular to 37 known faults (which have had displacement in Holocene time) passing within 3,000 feet of the 38

- 1 portions of the facility where treatment, storage, or disposal of hazardous waste will be
- 2 conducted. Such investigation shall document with supporting maps and other analyses, the
- 3 location of faults found.
- [Comment: The Guidance Manual for the Location Standards provides greater detail on the
 content of each type of seismic investigation and the appropriate conditions under which each
 approach or a combination of approaches would be used.]
- The WIPP facility is located in Eddy County, New Mexico. Eddy County is not listed in
 Part 264, Appendix VI; therefore, no further information is required to demonstrate
 compliance with § 264.18(a).
- (iii) Owners and operators of all facilities shall provide an identification of whether the facility is
 located within a 100-year floodplain. This identification must indicate the source of data for such
 determination and include a copy of the relevant Federal Insurance Administration (FIA) flood
 map, if used, or the calculations and maps used where an FIA map is not available. Information
 shall also be provided identifying the 100-year flood level and any other special flooding factors
 (e.g., wave action) which must be considered in designing, constructing, operating, or
 maintaining the facility to withstand washout from a 100-year flood.
- [Comment: Where maps for the National Flood Insurance Program produced by the Federal 17 Insurance Administration (FIA) of the Federal Emergency Management Agency are available. 18 they will normally be determinative of whether a facility is located within or outside of the 100-19 year floodplain. However, where the FIA map excludes an area (usually areas of the floodplain 20 less than 200 feet in width), these areas must be considered and a determination made as to 21 whether they are in the 100-year floodplain. Where FIA maps are not available for a proposed 22 facility location, the owner or operator must use equivalent mapping techniques to determine 23 whether the facility is within the 100-year floodplain, and if so located, what the 100-year flood 24 elevation would be.] 25
- The WIPP facility does not lie within a 100-year floodplain as defined in 20.4.1.500 NMAC, [incorporating 40 CFR 264.18(b)(2)(i)] and as regulated under 20.4.1.500 NMAC, [incorporating 40 CFR 264.18(b)(1)].
- The Federal Emergency Management Agency (**FEMA**) has not issued flood maps for the WIPP site. The WIPP site lies in FEMA Panel 350120 0675 B. In a search of this Panel for flood maps, this Panel shows up under the heading "Non-printed panels" indicating it is a geographic area for which FEMA has not identified a flooding risk.
- The Permittees' characterization of the flooding potential is in the 2009 Renewal 33 Application Addendum L1, Site Characterization, which references the U.S. Department 34 of Energy (DOE) Final Environmental Impact Statement, Section 7.4.1. The DOE used 35 data from the United States Geological Survey, which reported the maximum flood stage 36 for an August 23, 1966, event at monitoring station # 08406500 at Malaga, New Mexico. 37 This elevation was subtracted from the minimum elevation at the WIPP site to determine 38 that there is no flooding potential from the Pecos River. The DOE used a regional 39 topographic map to identify the closest approach of the Pecos River and the minimum 40 elevation of the WIPP site. A similar topographic map is shown in the 2009 Renewal 41 Application Addendum L1, Figure L1-25. The Permittees used the general ground 42 elevation in the vicinity of the surface facilities to calculate the height above the 100-year 43

- floodplain to be over 400 feet. The 2009 Renewal Application Addendum L1, Figure L1 25, indicates the location of the United States Geological Survey (**USGS**) reporting
 station on the Pecos River that is closest to the WIPP facility and that is used to
 determine the height above the maximum reported historical flood.
- To estimate the potential for overland flow and sheet flooding, the Permittees included
 Appendix D7 in the original Part B Permit Application as the calculation of the Probable
 Maximum Precipitation (PMP) event and used the information in the design of berms,
 dikes, and ditches. This information has not changed, so the Permittees have not
 resubmitted or updated the PMP calculations in the Renewal Application.
- 10 (iv) Owners and operators of facilities located in the 100-year floodplain must provide the
- 11 following information:
- (A) Engineering analysis to indicate the various hydrodynamic and hydrostatic forces expected
 to result at the site as consequence of a 100-year flood.
- (B) Structural or other engineering studies showing the design of operational units (e.g., tanks,
 incinerators) and flood protection devices (e.g., floodwalls, dikes) at the facility and how these
 will prevent washout.
- (C) If applicable, and in lieu of paragraphs (b)(11)(iv) (A) and (B) of this section, a detailed
 description of procedures to be followed to remove hazardous waste to safety before the facility
 is flooded, including:
- (1) Timing of such movement relative to flood levels, including estimated time to move the
 waste, to show that such movement can be completed before floodwaters reach the facility.
- (2) A description of the location(s) to which the waste will be moved and demonstration that
 those facilities will be eligible to receive hazardous waste in accordance with the regulations
 under parts 270, 271, 124, and 264 through 266 of this about or
- under parts 270, 271, 124, and 264 through 266 of this chapter.
- (3) The planned procedures, equipment, and personnel to be used and the means to ensure
 that such resources will be available in time for use.
- 27 (4) The potential for accidental discharges of the waste during movement.
- The WIPP facility does not lie within a 100-year floodplain as defined in 20.4.1.500 NMAC, [incorporating 40 CFR 264.18(b)(2)(i)] and as regulated under 20.4.1.500 NMAC, [incorporating 40 CFR 264.18(b)(1)].
- The FEMA has not issued flood maps for the WIPP site. The WIPP site lies in FEMA Panel 350120 0675 B. In a search of this Panel for flood maps, this Panel shows up under the heading "Non-printed panels" indicating it is a geographic area for which FEMA has not identified a flooding risk.
- The Permittees characterization of the flooding potential is in the 2009 Renewal Application Addendum L1, *Site Characterization*, which references the DOE Final Environmental Impact Statement, Section 7.4.1. The DOE used data from the United States Geological Survey, which reported the maximum flood stage for an August 23,

- 1966, event at monitoring station # 08406500 at Malaga, New Mexico. This elevation 1 2 was subtracted from the minimum elevation at the WIPP site to determine that there is no flooding potential from the Pecos River. The DOE used a regional topographic map to 3 identify the closest approach of the Pecos River and the minimum elevation of the WIPP 4 site. A similar topographic map is shown in the 2009 Renewal Application Addendum L1, 5 Figure L1-25. The Permittees used the general ground elevation in the vicinity of the 6 surface facilities to calculate the height above the 100-year floodplain to be over 400 7 feet. The 2009 Renewal Application Addendum L1, Figure L1-25, indicates the location 8 of the USGS reporting station on the Pecos River that is closest to the WIPP facility and 9 that is used to determine the height above the maximum reported historical flood. 10
- To estimate the potential for overland flow and sheet flooding, the Permittees included Appendix D7 in the original Part B Permit Application as the calculation of the PMP event and used the information in the design of berms, dikes, and ditches. This information has not changed, so the Permittees have not resubmitted or updated the PMP calculations in the Renewal Application.
- (v) Existing facilities NOT in compliance with §264.18(b) shall provide a plan showing how the
 facility will be brought into compliance and a schedule for compliance.
- (12) An outline of both the introductory and continuing training programs by owners or operators
 to prepare persons to operate or maintain the HWM facility in a safe manner as required to
 demonstrate compliance with §264.16. A brief description of how training will be designed to
 meet actual job tasks in accordance with requirements in §264.16(a)(3).
- The Permittees propose no significant changes to the training program as detailed in Renewal Application Attachment F, *Facility Personnel Permit Training Program*.
- (13) A copy of the closure plan and, where applicable, the post-closure plan required by
 §§264.112, 264.118, and 264.197. Include, where applicable, as part of the plans, specific
 requirements in §§264.178, 264.197, 264.228, 264.258, 264.280, 264.310, 264.351, 264.601,
 and 264.603.
- A copy of the closure plan, Renewal Application Attachments G and G1 through G3, and
 the post closure plan, Renewal Application Attachments H and H1, are included as part
 of the Renewal Application.
- (14) For hazardous waste disposal units that have been closed, documentation that notices
 required under §264.119 have been filed.
- At the time of submittal of this Renewal Application, the following HWDUs have been closed, and notices required under §264.119 have been filed: Panels 3, 4, 5, and 6.
- (15) The most recent closure cost estimate for the facility prepared in accordance with §264.142
- and a copy of the documentation required to demonstrate financial assurance under §264.143.
- For a new facility, a copy of the required documentation may be submitted 60 days prior to the initial receipt of hazardous wastes, if that is later than the submission of the part B.
- Pursuant to 40 CFR 264.140(c), the Federal government is exempt from §264 Subpart
 H, Financial Requirements. Additionally, and in accordance with the Military Construction

Appropriations Act, 2001, Pub. L. No.106-246, 114 Stat. 511 (2000), Nuclear Waste
 Partnership LLC (the co-operator) is not required to post bond or fulfill any other financial
 responsibility requirement relating to closure or post-closure care and monitoring of the
 WIPP facility. Therefore, this provision is not applicable.

(16) Where applicable, the most recent post-closure cost estimate for the facility prepared in
accordance with §264.144 plus a copy of the documentation required to demonstrate financial
assurance under §264.145. For a new facility, a copy of the required documentation may be
submitted 60 days prior to the initial receipt of hazardous wastes, if that is later than the

9 submission of the part B.

Pursuant to 40 CFR 264.140(c), the Federal government is exempt from §264 Subpart
 H, Financial Requirements. Additionally, and in accordance with the Military Construction
 Appropriations Act, 2001, Pub. L. No.106-246, 114 Stat. 511 (2000), Nuclear Waste
 Partnership LLC (the co-operator) is not required to post bond or fulfill any other financial
 responsibility requirement relating to closure or post-closure care and monitoring of the
 WIPP facility. Therefore, this provision is not applicable.

(17) Where applicable, a copy of the insurance policy or other documentation which comprises
 compliance with the requirements of §264.147. For a new facility, documentation showing the
 amount of insurance meeting the specification of §264.147(a) and, if applicable, §264.147(b),
 that the owner or operator plans to have in effect before initial receipt of hazardous waste for
 treatment, storage, or disposal. A request for a variance in the amount of required coverage, for
 a new or existing facility, may be submitted as specified in §264.147(c).

Pursuant to 40 CFR 264.140(c), the Federal government is exempt from §264 Subpart
 H, Financial Requirements. Additionally, and in accordance with the Military Construction
 Appropriations Act, 2001, Pub. L. No.106-246, 114 Stat. 511 (2000), Nuclear Waste
 Partnership LLC (the co-operator) is not required to post bond or fulfill any other financial
 responsibility requirement relating to closure or post-closure care and monitoring of the
 WIPP facility. Therefore, this provision is not applicable.

- (18) Where appropriate, proof of coverage by a State financial mechanism in compliance with
 §264.149 or §264.150.
- Pursuant to 40 CFR 264.140(c), the Federal government is exempt from §264 Subpart H, Financial Requirements. Additionally, and in accordance with the Military Construction Appropriations Act, 2001, Pub. L. No.106-246, 114 Stat. 511 (2000), Nuclear Waste Partnership LLC (the co-operator) is not required to post bond or fulfill any other financial responsibility requirement relating to closure or post-closure care and monitoring of the WIPP facility. Therefore, this provision is not applicable.

(19) A topographic map showing a distance of 1,000 feet around the facility at a scale of 2.5
centimeters (1 inch) equal to not more than 61.0 meters (200 feet). Contours must be shown on
the map. The contour interval must be sufficient to clearly show the pattern of surface water flow
in the vicinity of and from each operational unit of the facility. For example, contours with an
interval of 1.5 meters (5 feet), if relief is greater than 6.1 meters (20 feet), or an interval of 0.6
meters (2 feet), if relief is less than 6.1 meters (20 feet). Owners and operators of HWM facilities
located in mountainous areas should use large contour intervals to adequately show

topographic profiles of facilities. The map shall clearly show the following:

- 1 *(i) Map scale and date.*
- 2 Map scale and map date and contour intervals (as appropriate) are identified on 3 individual maps.
- 4 *(ii) 100-year floodplain area.*

5 The WIPP facility does not lie within a 100-year floodplain as defined in 20.4.1.500 6 NMAC, [incorporating 40 CFR 264.18(b)(2)(i)] and as regulated under 20.4.1.500 7 NMAC, [incorporating 40 CFR 264.18(b)(1)].

The FEMA has not issued flood maps for the WIPP site. The WIPP site lies in FEMA
 Panel 350120 0675 B. In a search of this Panel for flood maps, this Panel shows up
 under the heading "Non-printed panels" indicating it is a geographic area for which
 FEMA has not identified a flooding risk.

The Permittees characterization of the flooding potential is in the 2009 Renewal 12 Application Addendum L1, Site Characterization, which references the DOE Final 13 Environmental Impact Statement, Section 7.4.1. The DOE used data from the United 14 States Geological Survey, which reported the maximum flood stage for an August 23, 15 1966, event at monitoring station # 08406500 at Malaga, New Mexico. This elevation 16 was subtracted from the minimum elevation at the WIPP site to determine that there is 17 no flooding potential from the Pecos River. The DOE used a regional topographic map to 18 identify the closest approach of the Pecos River and the minimum elevation of the WIPP 19 site. A similar topographic map is shown in the 2009 Renewal Application Addendum L1, 20 Figure L1-25. The Permittees used the general ground elevation in the vicinity of the 21 surface facilities to calculate the height above the 100-year floodplain to be over 400 22 feet. The 2009 Renewal Application Addendum L1, Figure L1-25, indicates the location 23 of the USGS reporting station on the Pecos River that is closest to the WIPP facility and 24 that is used to determine the height above the maximum reported historical flood. 25

To estimate the potential for overland flow and sheet flooding, the Permittees included Appendix D7 in the original Part B Permit Application as the calculation of the PMP event and used the information in the design of berms, dikes, and ditches. This information has not changed, so the Permittees have not resubmitted or updated the PMP calculations in the Renewal Application.

- 31 *(iii)* Surface waters including intermittent streams.
- There are no major surface waters or intermittent streams within 10 miles of the WIPP facility.
- 34 *(iv)* Surrounding land uses (residential, commercial, agricultural, recreational).
- See Figures Demographic A through F in *Maps and Illustrations* for the following
 surrounding land uses:
- Demographic A-1: 2018 CY Active Mines in Eddy County; Potash, Industrial
 Minerals, Aggregate & Stone

1 2	 Demographic A-2: 2018 CY – Active Mines within a 10-Mile Radius of the WIF Facility 	PP
3 4	 Demographic B: 2019 CY - Natural Gas Pipelines and Utilities in the Vicinity of the WIPP Land Withdrawal Area 	of
5 6	 Demographic C-1: 2018 CY – New Mexico Livestock (Cattle & Calves); Number by County 	ber
7 8	Demographic C-2: 2019 CY – Grazing Allotments in the Vicinity of the WIPP Land Withdrawal Area	
9 10	 Demographic C-3: 2019 CY – Maximum Yearly Cattle Density within a 50-Mile Radius of the WIPP Facility 	e
11 12	 Demographic D-1: 2017 CY – Major Crop Production; Eddy, Lea, and Chaves Counties 	S
13 14	 Demographic D-2: 2017 CY – Edible Agriculture and Commercial Crops within 50-Mile Radius of the WIPP Facility 	n a
15 16	 Demographic E-1: 2018 CY – Estimated Populations of Major Town/City Center Within a 50-Mile Radius of the WIPP Facility 	ters
17 18	 Demographic E-2: 2018 CY – Estimated Ranch Populations within a 10-Mile Radius of the WIPP Facility 	
19 20 21 22 23 24 25 26 27 28	 Although there are no areas near the WIPP facility that are designated for pub recreation, maps of state and national parks and recreational areas found near the City of Carlsbad, New Mexico, have been provided in <i>Maps and Illustration</i> Demographics F-1 and F-2. The Permittees are unaware of formally designate recreation areas within a ten-mile radius of the WIPP site. Transient recreation usage (e.g., hunting, camping, off-road vehicle use, bird watching) is permitted under the multiple use policies of the Bureau of Land Management and the Sta Land Office. Within the WIPP site boundary transient recreational usage is permitted outside the Off-Limits Area. See Drawing 23-C-007-W1 for the Off- Limits Area. 	ar ons, ed nal ed
29	(v) A wind rose (i.e., prevailing wind-speed and direction).	
30	Shown in Maps and Illustrations, Demographic G.	
31	(vi) Orientation of the map (north arrow).	
32	Maps and appropriate figures contain a north arrow. A table entitled, Maps and	
33	<i>Illustrations</i> , is provided to direct the reviewer to the drawings, maps, and illustration	
34	providing the information required by 40 CFR 270.14(b)(19). The table also directs the	e
5.		-

providing the information required by 40 CFR 270.14(b)(19). The table also directs the reader to other new or revised illustrated information.

- 1 (vii) Legal boundaries of the HWM facility site.
- 2 Shown on Figure 2-3 in *Part A Application*.
- 3 (viii) Access control (fences, gates).
- Shown on Drawing 24-C-022-W, WIPP Site Facility Masterplan, in Maps and
 Illustrations.
- 6 (ix) Injection and withdrawal wells both on-site and off-site.
- 7 Shown on Figure 2-3 in *Part A Application*.

8 (x) Buildings; treatment, storage, or disposal operations; or other structure (recreation areas, 9 runoff control systems, access and internal roads, storm, sanitary, and process sewerage

10 systems, loading and unloading areas, fire control facilities, etc.)

11 The map for buildings, storage, or disposal operations; or other structures is located on 12 drawings 24-C-022-W, *WIPP Site Facility Masterplan*; 24-C-066-W1, *Sanitary Sewage*

Lagoon Liner Replacement Project Site Plan & Details; 23-C-011-W1, Salt Pile

14 Infiltration Controls New Design; and 22-V-001-W, Underground Mine Plan Structure

- 15 Contour of Base of Orange Marker Band, in Maps and Illustrations.
- 16 (xi) Barriers for drainage or flood control.
- The map of barriers for drainage or flood control is included on drawing 23-C-011-W1,
 Salt Pile Infiltration Controls New Design, in Maps and Illustrations.
- (xii) Location of operational units within the HWM facility site, where hazardous waste is (or will
 be) treated, stored, or disposed (include equipment cleanup areas).
- The map for the location of operational units within the HWM facility site, where hazardous waste is stored or disposed, is located on Figure 2-3, *Topographic Map with Underground Facilities*. Drawings that provide details of the location of the units within the facility include 24-C-022-W, *WIPP Site Facility Masterplan*, 22-V-001-W, *Underground Mine Plan Structure Contour of Base of Orange Marker Band*, and 54-W-009W, *Underground Mine Plan Shaft and Drift Dimensions*.
- (20) Applicants may be required to submit such information as may be necessary to enable the
 Regional Administrator to carry out his duties under other Federal laws as required in §270.3 of
 this part.
- The Permittees will submit information necessary to enable the Secretary to carry out his duties under other Federal laws as required in § 40 CFR 270.3, as requested.

(21) For land disposal facilities, if a case-by-case extension has been approved under §268.5 or

a petition has been approved under §268.6, a copy of the notice of approval for the extension or
 petition is required.

1 The WIPP Land Withdrawal Act Amendment of 1996 exempts waste designated by the 2 Secretary of DOE for disposal at the WIPP facility from the Land Disposal Restrictions 3 40 CFR 268.

(22) A summary of the pre-application meeting, along with a list of attendees and their
 addresses, and copies of any written comments or materials submitted at the meeting, as
 required under §124.31(c).

Information to satisfy the requirements of §124.31(c) is submitted with this Renewal 7 Application. Two sets of pre-application meetings were held. The first set of pre-8 application meetings occurred on September 10, 2019, and September 12, 2019, in 9 Carlsbad, New Mexico, and Santa Fe, New Mexico, respectively. The second set of pre-10 application meetings occurred on January 23, 2020, and January 30, 2020, in Santa Fe, 11 New Mexico, and Carlsbad, New Mexico, respectively. Summaries of the meetings, lists 12 of attendees, written comments, and material submitted at the meetings have been 13 included with this Renewal Application. 14

(c) Additional information requirements. The following additional information regarding
 protection of groundwater is required from owners or operators of hazardous waste facilities
 containing a regulated unit except as provided in §264.90(b) of this chapter:

- (1) A summary of the ground-water monitoring data obtained during the interim status period
 under §§265.90 through 265.94, where applicable.
- 20 The Permittees have not collected groundwater data under interim status.

(2) Identification of the uppermost aquifer and aquifers hydraulically interconnected beneath the
 facility property, including ground-water flow direction and rate, and the basis for such
 identification (i.e., the information obtained from hydrogeologic investigations of the facility
 area).

There has been no change in the identification of the uppermost aquifer or aquifers hydraulically connected beneath the WIPP facility property as detailed in Renewal Application Attachment L, *WIPP Groundwater Detection Monitoring Program Plan*.

(3) On the topographic map required under paragraph (b)(19) of this section, a delineation of the
 waste management area, the property boundary, the proposed "point of compliance" as defined
 under §264.95, the proposed location of groundwater monitoring wells as required under
 §264.97, and, to the extent possible, the information required in paragraph (c)(2) of this section.

There is no change to the delineation of the waste management area, the property 32 boundary, the point of compliance as defined under §264.95, or the location of 33 groundwater monitoring wells as required under §264.97 as illustrated in the topographic 34 map in Part A Application, Figure 2-3. The information required in paragraph (c)(2) of 35 this section (i.e., identification of the uppermost aquifer and aquifers hydraulically 36 interconnected beneath the facility property, including groundwater flow direction and 37 rate) is not illustrated on this topographic map. This information is provided in detail in 38 Renewal Application Attachment L, WIPP Groundwater Detection Monitoring Program 39 Plan. 40

- (4) A description of any plume of contamination that has entered the groundwater from a
 regulated unit at the time that the application was submitted that:
- (i) Delineates the extent of the plume on the topographic map required under paragraph (b)(19)
 of this section;
- 5 No plume of contamination has entered the groundwater from a regulated unit.
- 6 (ii) Identifies the concentration of each appendix IX, of part 264 of this chapter, constituent
- throughout the plume or identifies the maximum concentrations of each appendix IX constituent
 in the plume.
- 9 No plume of contamination has entered the groundwater from a regulated unit.
- (5) Detailed plans and an engineering report describing the proposed groundwater monitoring
 program to be implemented to meet the requirements of §264.97.
- No contamination has entered the groundwater from a regulated unit.
- (6) If the presence of hazardous constituents has not been detected in the groundwater at the
 time of permit application, the owner or operator must submit sufficient information, supporting
- time of permit application, the owner or operator must submit sufficient information, supporting data, and analyses to establish a detection monitoring program which meets the requirements
- of §264.98. This submission must address the following items specified under §264.98:
- No hazardous constituents have been detected in groundwater in the vicinity of the
 WIPP facility. Renewal Application Attachment L, *WIPP Groundwater Detection Monitoring Program Plan*, includes the Detection Monitoring Program that has been
 established to meet the requirements of §264.98.
- (i) A proposed list of indicator parameters, waste constituents, or reaction products that can
 provide a reliable indication of the presence of hazardous constituents in the ground water;
- There are no changes to the indicator parameters, waste constituents, or reaction
 products that can provide a reliable indication of the presence of hazardous constituents
 in the groundwater as listed Renewal Application Attachment L, *WIPP Groundwater Detection Monitoring Program Plan*.
- 27 (ii) A proposed ground-water monitoring system;
- The Permittees' groundwater monitoring system is detailed in Renewal Application Attachment L, *WIPP Groundwater Detection Monitoring Program Plan*.
- (iii) Background values for each proposed monitoring parameter or constituent, or procedures to
 calculate such values; and
- There has been no change to the background values for each proposed monitoring parameter. The results of groundwater background measurements taken over a fiveyear period have been reported by the Permittees to establish a statistical baseline. Furthermore, if the Permittees identify additional constituents to be monitored, the first
- ³⁶ four samples are used to establish background values for that constituent.

- (iv) A description of proposed sampling, analysis and statistical comparison procedures to be
 utilized in evaluating ground-water monitoring data.
- The Permittees' sampling, analysis and statistical comparison procedures to be utilized in evaluating groundwater monitoring data are detailed in Renewal Application Attachment L, *WIPP Groundwater Detection Monitoring Program Plan*.

(7) If the presence of hazardous constituents has been detected in the groundwater at the point 6 of compliance at the time of the permit application, the owner or operator must submit sufficient 7 information, supporting data, and analyses to establish a compliance monitoring program which 8 meets the requirements of §264.99. Except as provided in §264.98(h)(5), the owner or operator 9 must also submit an engineering feasibility plan for a corrective action program necessary to 10 meet the requirements of §264.100, unless the owner or operator obtains written authorization 11 in advance from the Regional Administrator to submit a proposed permit schedule for submittal 12 of such a plan. To demonstrate compliance with §264.99, the owner or operator must address 13 the following items: 14

- (*i*) A description of the wastes previously handled at the facility;
- (ii) A characterization of the contaminated groundwater, including concentrations of hazardous
 constituents;
- (iii) A list of hazardous constituents for which compliance monitoring will be undertaken in
 accordance with §§264.97 and 264.99;
- (iv) Proposed concentration limits for each hazardous constituent, based on the criteria set forth
 in §264.94(a), including a justification for establishing any alternate concentration limits;
- (v) Detailed plans and an engineering report describing the proposed groundwater monitoring
 system, in accordance with the requirements of §264.97; and
- (vi) A description of proposed sampling, analysis and statistical comparison procedures to be
 utilized in evaluating groundwater monitoring data.
- No contamination has entered the groundwater from a regulated unit. Therefore, the informational requirements to items (i) through (vi) do not apply.
- (8) If hazardous constituents have been measured in the ground water which exceed the 28 concentration limits established under §264.94 Table 1, or if ground water monitoring conducted 29 at the time of permit application under §§265.90 through 265.94 at the waste boundary indicates 30 the presence of hazardous constituents from the facility in ground water over background 31 concentrations, the owner or operator must submit sufficient information, supporting data, and 32 analyses to establish a corrective action program which meets the requirements of §264.100. 33 However, an owner or operator is not required to submit information to establish a corrective 34 action program if he demonstrates to the Regional Administrator that alternate concentration 35 limits will protect human health and the environment after considering the criteria listed in 36 §264.94(b). An owner or operator who is not required to establish a corrective action program 37 for this reason must instead submit sufficient information to establish a compliance monitoring 38 program which meets the requirements of §264.99 and paragraph (c)(6) of this section. To 39

- demonstrate compliance with §264.100, the owner or operator must address, at a minimum, the following items:
- (i) A characterization of the contaminated ground water, including concentrations of hazardous
 constituents;
- (ii) The concentration limit for each hazardous constituent found in the ground water as set forth
 in §264.94;
- 7 (iii) Detailed plans and an engineering report describing the corrective action to be taken; and
- (iv) A description of how the ground-water monitoring program will demonstrate the adequacy of
 the corrective action.
- 10 (v) The permit may contain a schedule for submittal of the information required in paragraphs
- (c)(8) (iii) and (iv) provided the owner or operator obtains written authorization from the Regional
 Administrator prior to submittal of the complete permit application.
- No contamination has entered the groundwater from a regulated unit. Therefore, this requirement does not apply.
- (d) Information requirements for solid waste management units. (1) The following information is
 required for each solid waste management unit at a facility seeking a permit:
- (i) The location of the unit on the topographic map required under paragraph (b)(19) of this
 section.
- 19 (ii) Designation of type of unit.
- 20 (iii) General dimensions and structural description (supply any available drawings).
- 21 (iv) When the unit was operated.
- (v) Specification of all wastes that have been managed at the unit, to the extent available.
- The NMED determined that no further action is necessary to investigate 15 Solid Waste Management Units (**SWMUs**) and eight Areas of Concern (**AOCs**) at the WIPP facility. A Class 3 permit modification request to remove SWMUs and AOCs from their Permit was approved by the NMED on October 23, 2008. No new SWMUs or AOCs have been identified for inclusion in the Renewal Application.
- (2) The owner or operator of any facility containing one or more solid waste management units
 must submit all available information pertaining to any release of hazardous wastes or
 hazardous constituents from such unit or units.
- The NMED determined that no further action is necessary to investigate 15 SWMUs and eight AOCs at the WIPP facility. A Class 3 permit modification request to remove SWMUs and AOCs from their Permit was approved by the NMED on October 23, 2008. No new SWMUs or AOCs have been identified for inclusion in the Renewal Application.

(3) The owner/operator must conduct and provide the results of sampling and analysis of 1

2 groundwater, land surface, and subsurface strata, surface water, or air, which may include the

installation of wells, where the Director ascertains it is necessary to complete a RCRA Facility 3

Assessment that will determine if a more complete investigation is necessary. 4

- The NMED determined that no further action is necessary to investigate 15 SWMUs and 5
- eight AOCs at the WIPP facility. A Class 3 permit modification request to remove 6
- SWMUs and AOCs from their Permit was approved by the NMED on October 23, 2008. 7 No new SWMUs or AOCs have been identified for inclusion in the Renewal Application.

8

§270.15 Specific part B information requirements for containers 9

Except as otherwise provided in §264.170, owners or operators of facilities that store containers 10 of hazardous waste must provide the following additional information: 11

(a) A description of the containment system to demonstrate compliance with §264.175. Show at 12 least the following: 13

- (1) Basic design parameters, dimensions, and materials of construction. 14
- In the original Part B Permit Application, the Permittees submitted Appendix D3 which 15 contained detailed engineering information regarding the storage units and associated 16 buildings and structures in the form of drawings and diagrams. These represented the 17 "as-built" condition of the facility. Some of these drawings and diagrams have been 18 revised since they were resubmitted with the 2009 Renewal Application and, therefore, 19 are being provided in this Renewal Application. Revisions included those that altered a 20 structure, added a new structure, or modified the function of a structure. These drawings 21 and diagrams are: 22
- 23-C-007-W1: Land Withdrawal Area Location of Facilities 23
- 24-C-022-W: WIPP Site Facility Masterplan 24 •
- 23-C-011-W1: Salt Pile Infiltration Controls New Design 25
- 24-C-028-W1: WIPP Site Finish Grading and Paving 26
- 24-C-028-W2: Site Work Finish Grading and Paving Sections and Details 27 •
- 41-S-003-W1: Waste Handling Building 411 Firewater Collection Sprinkler 28 • System P & ID [Piping and Instrumentation Diagram] 29
- 41-S-003-W2: Waste Handling Building 411 Firewater Collection Sprinkler 30 System P & ID [Piping and Instrumentation Diagram] 31
- 41-S-003-W3: Waste Handling Building 411 Firewater Collection Sprinkler 32 • System P & ID [Piping and Instrumentation Diagram] 33
- 41-S-003-W4: Waste Handling Building 411 Firewater Collection Sprinkler 34 • System P & ID [Piping and Instrumentation Diagram] 35

41-M-001-W: Waste Handling Facilities TRUPACT Dock Equipment 1 • Arrangement 2 41-B-010-W1: CH Area Constant Volume, CH Area HVAC [Heating, Ventilation, 3 and Air Conditioning] Flow Diagram Supply Air 4 Containment systems are provided by transportation packaging for unloaded waste and 5 by the concrete floor of the Waste Handling Building as described in Renewal 6 Application Attachment A1, Container Storage. The Permittees proposed no changes to 7 the basic design parameters, dimensions, and materials of construction of the 8 containment system. 9 (2) How the design promotes drainage or how containers are kept from contact with standing 10 liquids in the containment system. 11 The Permittees propose no changes in the manner in which the containers are kept from 12 contacting standing liquids as detailed in Renewal Application Attachment A1, Container 13 Storage, Section A1-1f, Containment. 14 (3) Capacity of the containment system relative to the number and volume of containers to be 15 stored. 16 The Permittees propose no changes in the capacity of the containment system relative 17 to numbers and volume of containers to be stored, as detailed in Renewal Application 18 Attachment A1, Container Storage, Section A1-1f, Containment. 19 (4) Provisions for preventing or managing run-on. 20 The Permittees propose no change in the manner in which they manage run-on as 21 detailed in Renewal Application Addendum D1, Preparedness and Prevention, Section 22 D1-2b, Runoff and Renewal Application Attachment A1, Container Storage, Section A1-23 1i, Control of Run On. 24 (5) How accumulated liquids can be analyzed and removed to prevent overflow. 25 The Permittees propose no change to the manner in which accumulated liquids can be 26 analyzed and removed to prevent overflow as described in the Renewal Application 27 Attachment D, Section D-4b, Identification of Released Materials and Assessment of the 28 Extent of the Emergency, and Renewal Application Attachment A1, Container Storage. 29 (b) For storage areas that store containers holding wastes that do not contain free liquids, a 30 demonstration of compliance with §264.175(c), including: 31 (1) Test procedures and results or other documentation or information to show that the wastes 32 do not contain free liquids; and 33 The Permittees propose no change. The DOE manages TRU mixed waste containers in 34 the Parking Area and the Waste Handling Building as though they contain up to one 35 percent observable liquids. Appropriate secondary containment calculations are 36 provided in Renewal Application Attachment A1, Container Storage. Consequently, the 37

- requirements in 20 4.1.500 NMAC, incorporating 40 CFR §264.175(c) do not apply to the WIPP facility.
- (2) A description of how the storage area is designed or operated to drain and remove liquids or
 how containers are kept from contact with standing liquids.
- 5 The Permittees propose no change. The DOE manages TRU mixed waste containers in 6 the Parking Area and the Waste Handling Building as though they contain up to one 7 percent observable liquids. Appropriate secondary containment calculations are 8 provided in Renewal Application Attachment A1, *Container Storage*. Consequently, the 9 requirements in 20 4.1.500 NMAC, incorporating 40 CFR §264.175(c) do not apply to 10 the WIPP facility.
- (c) Sketches, drawings, or data demonstrating compliance with §264.176 (location of buffer
 zone and containers holding ignitable or reactive wastes) and §264.177(c) (location of
 incompatible wastes), where applicable.
- Waste received at the WIPP facility will be determined to be compatible prior to being
 received at the WIPP facility. Ignitable, reactive, or corrosive waste (i.e., compressed
 gases and liquids in excess of the TSDF-WAC) are prohibited in accordance with the
 TSDF WAC. Therefore, a buffer zone for containers holding ignitable or reactive wastes
 and incompatible wastes is not needed.
- (d) Where incompatible wastes are stored or otherwise managed in containers, a description of
- the procedures used to ensure compliance with §§264.177 (a) and (b), and 264.17 (b) and (c).
- The Permittees propose no change to the compatibility determination as identified in Renewal Application Attachment C, *Waste Analysis Plan*. Furthermore, the TSDF-WAC in Renewal Application Attachment C, *Waste Analysis Plan*, prohibits the receipt of incompatible waste and Renewal Application Attachment D, *RCRA Contingency Plan*,
- requires the evaluation of compatibility during control and containment of an emergency.
- (e) Information on air emission control equipment as required in §270.27.
- Pursuant to 40 CFR 264.1080(a)(6), air emission controls for containers do not apply to radioactive mixed waste. Therefore, this requirement is not applicable.

29 §270.23 Specific part B information requirements for miscellaneous units

Except as otherwise provided in §264.600, owners and operators of facilities that treat, store, or dispose of hazardous waste in miscellaneous units must provide the following additional information:

- (a) A detailed description of the unit being used or proposed for use, including the following:
- 34 (1) Physical characteristics, materials of construction, and dimensions of the unit;
- In the original Part B Permit Application, the Permittees submitted Appendix D3 which
 contained detailed engineering information regarding the disposal units and associated
 buildings and structures in the form of drawings and diagrams. These represented the

"as-built" condition of the facility. Some of these drawings and diagrams have been
 revised since they were resubmitted with the 2009 Renewal Application and, therefore,
 are being provided in this Renewal Application. Revisions included those that altered a
 structure, added a new structure, or modified the function of a structure. These drawings
 and diagrams are:

- 22-V-001-W: Underground Mine Plan Structure Contour of Base of Orange Marker Band
- 53-J-039-W: Underground Utilities Fire Panel 534-FP-0320

6

7

10

- 9 53-J-042-W: Underground Utilities Fire Panel 534-FP-00601
 - 54-W-009-W: Underground Mine Plan Shaft and Drift Dimensions

Panel 8 is currently being constructed. Prior to using Panel 8 for TRU mixed waste 11 disposal, the Permittees will submit to the Secretary, by certified mail or hand delivery, a 12 letter signed by the Permittees and a New Mexico registered professional engineer 13 stating Panel 8 has been constructed in compliance with the Permit, and the Permittees 14 will not manage any hazardous waste in Panel 8 until the Secretary has either inspected 15 the modified portion of the facility and finds it is in compliance with the conditions of this 16 Permit; or waived the inspection or, within fifteen calendar days of the date of 17 submission of the letter required above, has not notified the Permittees of his intent to 18 inspect. 19

(2) Detailed plans and engineering reports describing how the unit will be located, designed,
 constructed, operated, maintained, monitored, inspected, and closed to comply with the
 requirements of §§264.601 and 264.602; and

The Permittees are not proposing any changes to detailed plans and engineering reports 23 describing how the unit will be located, designed, constructed, operated, maintained, 24 monitored, and inspected to comply with the requirements of §§264.601 and 264.602, as 25 described in Renewal Application Attachment A1, Container Storage; Attachment A2, 26 Geologic Repository; Attachment E, Inspection Schedule, Process and Forms; 27 Attachment L, WIPP Groundwater Detection Monitoring Program Plan; Attachment N, 28 Volatile Organic Compounds Monitoring Plan; and the WIPP facility Closure Plan 29 documents: Renewal Application Attachments G, G1, and G3, and Post-Closure Plan 30 documents: Renewal Application Attachments H and H1. 31

- (3) For disposal units, a detailed description of the plans to comply with the post-closure
 requirements of §264.603.
- There are no changes to the plans to comply with the post-closure requirements of §264.603 as detailed in Renewal Application Attachment H, *Post-Closure Plan*.

(b) Detailed hydrologic, geologic, and meteorologic assessments and land-use maps for the
 region surrounding the site that address and ensure compliance of the unit with each factor in
 the environmental performance standards of §264.601. If the applicant can demonstrate that he

does not violate the environmental performance standards of §264.601 and the Director agrees

with such demonstration, preliminary hydrologic, geologic, and meteorologic assessments will
 suffice.

There are no changes to the detailed hydrologic, geologic, and meteorologic assessments and land-use maps for the region surrounding the site that address and ensures compliance of the unit with each factor in the environmental performance standards of §264.601. However, updated information is provided in Renewal Application Addendum L1, *Site Characterization*.

- (c) Information on the potential pathways of exposure of humans or environmental receptors to
 hazardous waste or hazardous constituents and on the potential magnitude and nature of such
 exposures.
- 11 The Permittees described the potential pathways for exposure of humans or 12 environmental receptors to the hazardous waste or hazardous constituents in TRU 13 mixed waste in Chapter D, Section D-9b of the original Part B Permit Application. This 14 description included the geology and hydrology of the miscellaneous unit and the 15 operational features of the WIPP facility that minimize exposure.
- In the original Part B Permit Application, the disposal system was modeled by the
 Permittees using three different configurations for the purposes of demonstrating
 compliance to the environmental performance standards (i.e., exposure assessment).
 These configurations were used because each configuration is sufficiently different to
 warrant separate compliance discussions. These configurations, and the modeling
 assumptions associated with each, were as follows:
- OPEN PANELS, which includes panels that are actively receiving waste and backfill.
- Under this configuration, creep closure will proceed at expected rates. The 24 design of the rooms is such that creep will not close the room to the top of the 25 backfill (about 18 in. [91 cm]) while the panel is open (i.e., before the panel 26 closures are put in place). Brine inflow may occur immediately after excavation 27 and continue until the facility is sealed. However, during this period of time, no 28 accumulation of brine is expected since observed brine inflow is readily 29 evaporated into the dry mine air and rapidly decreases with aging of the 30 excavation. For active rooms, the ventilation system will disperse the VOCs that 31 diffuse through the filter vents installed on the containers. No gas generation 32 resulting from the corrosion of metals is expected due to the low humidity. Gas 33 generation due to microbial degradation will proceed depending on the 34 availability of moisture within the waste containers. Open panels will consist of 35 active rooms and inactive rooms. Active rooms are those that are being 36 ventilated. Inactive rooms are filled with waste and are isolated from the 37 ventilation system using flow control devices (e.g., chainlink and brattice cloth, 38 bulkheads). Although these rooms are not ventilated, gases that are released 39 from the waste containers may be displaced into the active parts of the panel. 40
- CLOSED PANELS, which includes panels that have been isolated from the underground ventilation system.

- This configuration began when Panel 1 was removed from ventilation in 2003 1 2 and will extend until the last lowermost short-term components of the shaft seals are in place. Under this configuration, creep closure will proceed at expected 3 rates to reduce the porosity of the disposal region. Deterioration could be 4 sufficient to cause roof falls which could breach bags of backfill and containers of 5 waste. Waste containers are assumed to be open, and the ambient air VOC 6 concentrations are assumed to be in equilibrium throughout the panel. No 7 ventilation air is allowed through the panel so that gases that are generated 8 result in pressurization of the panel. Further pressurization is caused by the 9 volume reduction associated with creep closure. Brine can begin to accumulate 10 within the panel. Once the panel begins to pressurize, flow is established through 11 the panel closure system so that VOCs can be displaced into the mine ventilation 12 system where they are added to the inventory of constituents coming from open 13 panels. Flow from the closed panel is assumed to be equal to the rate of gas 14 generation and creep closure so that significant pressures do not build up behind 15 the panel closures. 16
- SEALED FACILITY, which occurs when the last of the lowermost short-term shaft seal members are emplaced and are functional.
- This period begins with the emplacement of this seal member and ends 30 years 19 after the certification of final closure is filed with the NMED. During this period of 20 time, brine inflow may continue, and, depending on the rate of inflow, humid or 21 inundated gas generation mechanisms may become operative. These 22 mechanisms will result in greater quantities of gas being generated. Creep 23 closure will continue to reduce the porosity of the disposal region until there is 24 sufficient resistance from the solids in the repository (waste and backfill) or fluids 25 (gas or brine) to impede further closure. Pressure equilibrium will exist 26 throughout the underground, and pressure will increase due to the low 27 permeability of the short-term shaft seal components. As pressure increases, 28 brine inflow will slow as the difference between far-field and near-field pressures 29 equalizes. The time at which the disposal region will reach lithostatic pressure 30 with the resulting final porosity will depend on the interaction of three time-31 dependent parameters: creep closure, brine inflow, and gas generation. Until the 32 repository reaches hydrostatic pressure, flow gradients will be inward. Between 33 hydrostatic and lithostatic pressure, flow will be either inward or outward, 34 depending on the efficiency of seals in shafts and boreholes. Once lithostatic 35 pressure is reached within the repository there will be no fluid flow unless internal 36 repository pressure continues to increase. 37
- Evaluating repository performance during these three scenarios resulted in the conclusion that the only viable pathway for release during facility operations is the air pathway. After facility closure the pathway of interest is groundwater.
- 41 <u>Air Pathway</u>

Containers are required to be vented through one or more DOE-approved filter vents to
 prevent internal container pressurization caused by gas generation and to prevent
 radioactive particulate material from escaping. During the WIPP operational period,
 VOCs in the vapor state diffuse across these filters and migrate into the ambient air via

the underground ventilation system. The Permittees guantified these releases for the 1 2 purposes of determining the potential for exposure to humans and environmental receptors in the original Part B Permit Application; the most recent updates to the 3 calculations of exposure were provided in the Class 2 Permit Modification Request 4 (PMR), Revise Volatile Organic Compound Monitoring Procedures, submitted to the 5 NMED on September 8, 2015, and approved on January 8, 2016, and the revised Class 6 3 PMR, Modifications to the WIPP Panel Closure Plan, submitted to the NMED on 7 November 10, 2016, and approved on September 7, 2018. Based on the modeling, the 8 Permit requires an extensive VOC monitoring effort to protect three classes of 9 individuals. 10

- Underground waste handling personnel are protected from acute exposure as the result of the Disposal Room VOC Monitoring Program, as described in 12 Renewal Application Attachment N, Volatile Organic Compound Monitoring Plan. This monitoring includes measurements of the concentrations of target VOCs in 14 filled disposal rooms and the establishment of action levels intended to protect 15 underground waste handling personnel from being subjected to acute doses of 16 VOCs that would be released into their working area as the result of a roof fall in a filled adjacent disposal room. Concentrations of concern and action levels are based on the immediately dangerous to life or health concentration or the lower 19 explosive limit (whichever is lower) are listed in Permit Part 4, Tables 4.4.1, VOC 20 Room Based Limits, and 4.6.3.2, Action Levels for Disposal Room Monitoring, and are not proposed for change in this Renewal Application. The results of this 22 monitoring are reported to the NMED semi-annually. 23
- Non-waste workers on the surface are protected from chronic exposure to VOCs • 24 as the result of the Repository VOC Monitoring Program, as described in 25 Renewal Application Attachment N, Volatile Organic Compound Monitoring Plan. 26 Air emission modeling associated with the underground exhaust indicates that 27 the location of the maximally exposed individual is a worker in the Training 28 Building. Monitoring at that location is used to detect VOC concentrations that 29 can have long-term effects on the worker's health. The measured concentrations 30 are converted into risk, and the risk is summed to determine the cumulative risk. 31 The exposure standards for these workers are set by the Permit at one excess 32 cancer death in 100,000 (risk of 10⁻⁵) for carcinogenic compounds and a Hazard 33 Index (HI) of 1 (HI<1) for non-carcinogenic chemicals. The EPA publishes 34 chemical-specific risk factors for inhalation in the EPA Regional Screening Level 35 (**RSL**) tables¹. These risk factors are provided in Permit Part 4, Table 4.6.2.3, 36 Recommended EPA Risk Factors. The risk factors and the list of chemicals to 37 monitor are not being changed in this Renewal Application. 38
- Members of the public living beyond the WIPP site boundary are protected from 39 • chronic exposure to VOCs as the result of the WIPP Panel Closure described in 40 Renewal Application Attachments G and G1. Air emission modeling associated 41 with the underground exhaust was used to evaluate the performance of Panel 42 Closures. The NMED established a total risk for offsite members of the public at 43 one excess cancer death in one million (10⁻⁶) and a HI of less than 1.0 for non-44

¹ EPA Regional Screening Level Tables are available at: https://semspub.epa.gov/src/document/HQ/199445

11

13

17

18

carcinogens. In order to equate these environmental performance levels to
 performance levels for panel closures, it is necessary to introduce risk-based
 levels also referred to as health-based levels (HBLs) for WIPP facility-specific
 risk parameters.

Risk-based levels are chemical-specific concentrations that correspond to specified risk 5 levels, such as a per chemical cancer risk of 10⁻⁶. Risk-based levels can be obtained 6 from the EPA RSL tables. The EPA RSL tables use default exposure assumptions that 7 are designed to be protective of a population that is exposed on a daily basis for many 8 years (i.e., chronic exposure). The RSL calculations can be modified to produce site-9 specific concentrations that account for site-specific exposure conditions as opposed to 10 the generic conditions used by the EPA. For the WIPP facility, site-specific calculations 11 have historically been referred to as HBLs. The HBLs for the WIPP facility are provided 12 in Permit Part 6, Table 6.10.1, WIPP Panel Closure Volatile Organic Compound Closure 13 Standard for Public Exposures. These HBLs and the list of chemicals are not being 14 changed in this Renewal Application. 15

16 Groundwater Pathway

26

27

28

29

The Permittees have reevaluated the repository post-closure performance
 demonstration that was submitted with the original Part B Application and subsequently
 updated in the 2009 Renewal Application. The figures provided in Renewal Application
 Addendum N1, *300-year Performance Demonstration Re-Evaluation*, illustrate the
 following information:

- Figure N1-1 Predicted Average Pressure in Southernmost Waste Panel for the PABC-20004 and for the CRA-2014 PA
- Figure N1-2 Predicted Average Cumulative Moles of Gas Generated in the Southernmost Waste Panel for the PABC-20004 and for the CRA-2014 PA
 - Figure N1-3 Predicted Cumulative Brine Inflow into the Southernmost Waste Panel for the PABC-20004 and for the CRA-2014 PA
 - Figure N1-4 Predicted Average Porosity in the Southernmost Waste Panel for the PABC-20004 and for the CRA-2014 PA
- Figure N1-5 Predicted Average Brine Saturation in the Southernmost Waste
 Panel for the PABC-20004 and for the CRA-2014 PA
- There is no change to the conclusion that the only viable mechanism for a release from the repository during the 300-year post-closure period is the air emissions pathway. This pathway only exists prior to final closure. No viable releases along soil or water pathways were identified. There is no change to the potential exposure of humans or environmental receptors to hazardous waste or hazardous constituents or to the magnitude and nature of such exposures.
- (d) For any treatment unit, a report on a demonstration of the effectiveness of the treatment
 based on laboratory or field data.

- 1 The Permittees do not operate treatment units at the WIPP facility.
- (e) Any additional information determined by the Director to be necessary for evaluation of
 compliance of the unit with the environmental performance standards of §264.601.
- Any additional information determined by the Secretary to be necessary for evaluation of compliance of the unit with the environmental performance standards of §264.601 will be
- 6 provided as requested.

Maps and Illustrations

Maps and Illustrations Crosswalk

Regulatory Citation	Requirement	Comment	Identification №
40 CFR §270.14(b)(19)	A topographic map showing a distance of 1,000 feet around the facility at a scale of 2.5 centimeters (1 inch) equal to not more than 61.0 meters (200 feet). Contours must be shown on the map. The contour interval must be sufficient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit of the facility. For example, contours with an interval of 1.5 meters (5 feet), if relief is greater than 6.1 meters (20 feet), or an interval of 0.6 meters (2 feet), if relief is less than 6.1 meters (20 feet). Owners and operators of HWM facilities located in mountainous areas should use large contour intervals to adequately show topographic profiles of facilities. The map shall clearly show the following:	As the Waste Isolation Pilot Plant (WIPP) facility is a large facility consisting of 16 sections (each section containing 640 acres) several maps and figures were employed so that the information that is required by 40 CFR §270.14(b)(19) <i>et seq.</i> can be better illustrated. Map scale and contours are noted on the appropriate figures and maps. To place all information on one topographic map would make it difficult to review. This table was provided to make it easier for the reviewer to locate the information.	Part A Application, Appendix 2, Figure 2- 2
40 CFR §270.14(b)(19)(i)	Map scale and date	There are multiple maps and engineered drawings provided to illustrate the required information. All appropriate maps and figures depict map scale, date.	Part A Application, Appendix 2, Figure 2- 2
		2018 CY – Active Mines in Eddy County Potash, Industrial Minerals, Aggregate & Stone	Demographic A-1
		2018 CY – Active Mines within a 10- Mile Radius of the WIPP Facility	Demographic A-2
		2019 CY - Natural Gas Pipelines and Utilities In the Vicinity of the WIPP Land Withdrawal Area	Demographic B
		2018 CY – New Mexico Livestock (Cattle & Calves) Number by County	Demographic C-1

Regulatory Citation	Requirement	Comment	Identification №
		2019 CY – Grazing Allotments In the Vicinity of the WIPP Land Withdrawal Area	Demographic C-2
		2019 CY – Maximum Allowable Yearly Cattle Density Within a 50-Mile Radius of the WIPP Facility	Demographic C-3
		2017 CY – Major Crop Production Eddy, Lea, and Chaves Counties	Demographic D-1
		2017 CY – Edible Agriculture and Commercial Crops Within a 50-Mile Radius of the WIPP Facility	Demographic D-2
		2018 CY – Estimated Populations of Major Town/City Centers Within a 50- Mile Radius of the WIPP Facility	Demographic E-1
		2018 CY – Estimated Ranch Populations Within a 10-Mile Radius of the WIPP Facility	Demographic E-2
		State Parks in New Mexico	Demographic F-1
		National Parks in New Mexico	Demographic F-2
		2013 – 2017: Wind Speed Direction Report, WIPP Meteorological Station	Demographic G
		Land Withdrawal Area Location of Facilities	Drawing 23-C-007-W
		WIPP Site Facility Masterplan	Drawing 24-C-022-W
		Sanitary Sewage Lagoon Liner Replacement project, Site Plan and Details	Drawing 24-C-066-W1
		Salt Pile Infiltration Controls, New Design	Drawing 23-C-011-W1

Regulatory Citation	Requirement	Comment	Identification №
		Underground Mine Plan Structure of Base of Orange Marker Band	Drawing 22-V-001-W
40 CFR §270.14(b)(19)(ii)	100-year floodplain area	The WIPP facility is not in the 100- year floodplain	NA
40 CFR §270.14(b)(19)(iii)	Surface waters including intermittent streams	There are no surface waters or intermittent streams	NA
40 CFR §270.14(b)(19)(iv)	Surrounding land uses	2018 CY – Active Mines Within a 10- Mile Radius of the WIPP Facility	Demographic A-2
		2018 CY – Estimated Populations of Major Town/City Centers Within a 50- Mile Radius of the WIPP Facility	Demographic E-1
		2019 CY - Maximum Allowable Yearly Cattle Density Within a 50-Mile Radius of the WIPP Facility	Demographic C-3
		2019 CY - Natural Gas Pipelines and Utilities In the Vicinity of the WIPP Land Withdrawal Area	Demographic B
		2017 CY – Edible Agriculture and Commercial Crops Within a 50-Mile Radius of the WIPP Facility	Demographic D-2
		State Parks in New Mexico	Demographic F-1
		National Parks in New Mexico	Demographic F-2
40 CFR §270.14(b)(19)(v)	A wind rose	2013 – 2017: Wind Speed Direction Report	Demographic G
40 CFR §270.14(b)(19)(vi)	Orientation of the map	Each map contains a north orientation compass	See list in 40 CFR §270.14(b)(19)(i), (iv), and (v)

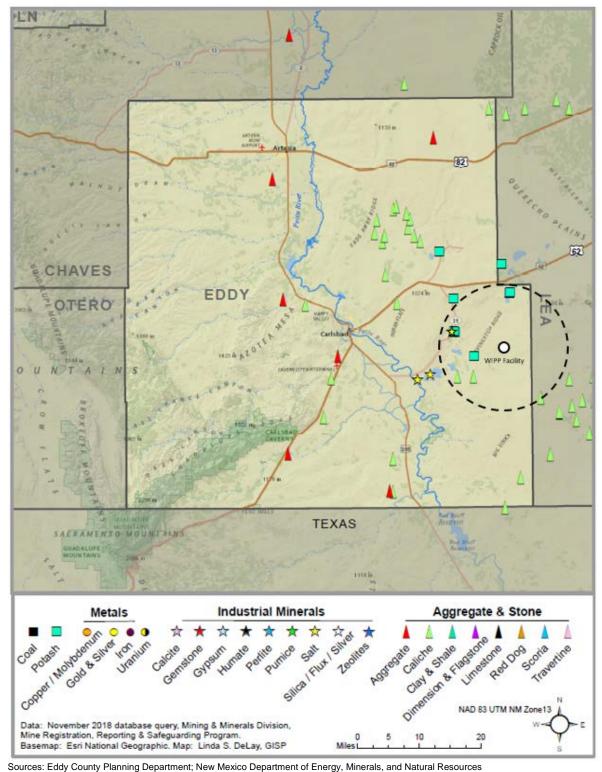
Regulatory Citation	Requirement	Comment	Identification №
40 CFR §270.14(b)(19)(vii)	Legal boundaries of the HWM facility site	Topographic Map with Underground Facilities and Land Withdrawal Area/Location of Facilities	Part A Application, Appendix 2, Figure 2- 2
40 CFR §270.14(b)(19)(viii)	Access control	WIPP Site Facility Masterplan	Drawing 24-C-022-W
40 CFR §270.14(b)(19)(ix)	Injection and withdrawal wells both on-site and off-site	Topographic Map with Underground Facilities	Part A Application, Appendix 2, Figure 2- 2
40 CFR	Buildings; treatment, storage, or disposal operations; or other structure (recreation areas, runoff control systems, access and internal roads, storm, sanitary, and process sewerage systems, loading and unloading areas, fire control facilities, etc.)	WIPP Site Facility Masterplan	Drawing 24-C-022-W
§270.14(b)(19)(x)		Underground Mine Plan Structure Contour of Base of Orange Marker Band	Drawing 22-V-001-W
		Sanitary Sewage Lagoon Liner Replacement Project Site Plan and Details	Drawing 24-C-066-W1
		Salt Pile Infiltration Controls New Design	Drawing 23-C-011-W1
40 CFR §270.14(b)(19)(xi)	Barriers for drainage or flood control	Salt Pile Infiltration Controls New Design	Drawing 23-C-011-W1
		WIPP Site Finish Grading and Paving	Drawing 24-C-028-W1
40 CFR	Location of operational units within the HWM facility site, where hazardous waste is treated, stored, or disposed	WIPP Site Facility Masterplan	Drawing 24-C-022-W
§270.14(b)(19)(xii)		Underground Mine Plan Structure Contour of Base of Orange Marker Band	Drawing 24-C-028-W1
		Topographic Map with Underground Facilities	Part A Application, Appendix 2, Figure 2- 2

Regulatory Citation	Requirement	Comment	Identification №	
The Following Drawings Contain New/Revised Information and Are Being Submitted With the Renewal Application – Part B				
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>§264.175</u> . Show at least the following: (1) Basic design parameters, dimensions, and	WIPP Site Facility Masterplan	Drawing 24-C-022-W	
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with §264.175. Show at	WIPP Site Finish Grading and Paving	Drawing 24-C-028-W1	
	 (1) Basic design parameters, dimensions, and materials of construction. 			
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>§264.175</u> . Show at least the following:	Site Work Finish Grading and Paving Sections and Details	Drawing 24-C-028-W2	
	(1) Basic design parameters, dimensions, and materials of construction.			
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>§264.175</u> . Show at least the following:	Salt Pile Infiltration Controls New Design	Drawing 23-C-011-W1	
	(1) Basic design parameters, dimensions, and materials of construction.			
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>§264.175</u> . Show at least the following:	Waste Handling Building 411 Fire Protection Sprinkler System P & ID	Drawing 41-S-003-W1	
	(1) Basic design parameters, dimensions, and materials of construction.			

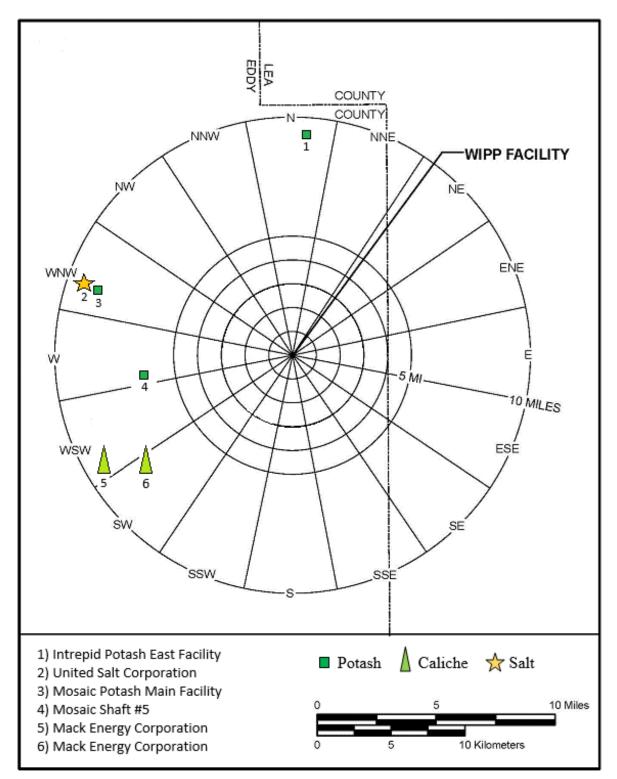
Regulatory Citation	Requirement	Comment	Identification №
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>§264.175</u> . Show at least the following: (1) Basic design parameters, dimensions, and materials of construction.	Waste Handling Building 411 Fire Protection Sprinkler System P & ID	Drawing 41-S-003-W2
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>\$264.175</u> . Show at least the following: (1) Basic design parameters, dimensions, and materials of construction.	Waste Handling Building 411 Fire Protection Sprinkler System P & ID	Drawing 41-S-003-W3
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>§264.175</u> . Show at least the following: (1) Basic design parameters, dimensions, and materials of construction.	Waste Handling Building 411 Fire Protection Sprinkler System P & ID	Drawing 41-S-003-W4
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>§264.175</u> . Show at least the following: (1) Basic design parameters, dimensions, and materials of construction.	Waste Handling Facilities TRUPACT Dock Equipment Arrangement	Drawing 41-M-001-W
40 CFR §270.15(a)(1)	A description of the containment system to demonstrate compliance with <u>§264.175</u> . Show at least the following: (1) Basic design parameters, dimensions, and materials of construction.	CH Area Constant Volume CH Area HVAC Flow Diagram Supply Air	Drawing 41-B-010-W1
40 CFR §270.23(a)(1)	A detailed description of the unit being used or proposed for use, including the following: (1) Physical characteristics, materials of	Underground Mine Plan Structure Contour of Base of Orange Marker Band	Drawing 22-V-001-W
	construction, and dimensions of the unit;	Underground Utilities Fire Panel 534- FP-0320	Drawing 53-J-039-W

Regulatory Citation	Requirement	Comment	Identification №
		Underground Utilities Fire Panel 534- FP-00601	Drawing 53-J-042-W
		Underground Mine Plan Shaft and Drift Dimensions	Drawing 54-W-009-W

Demographics

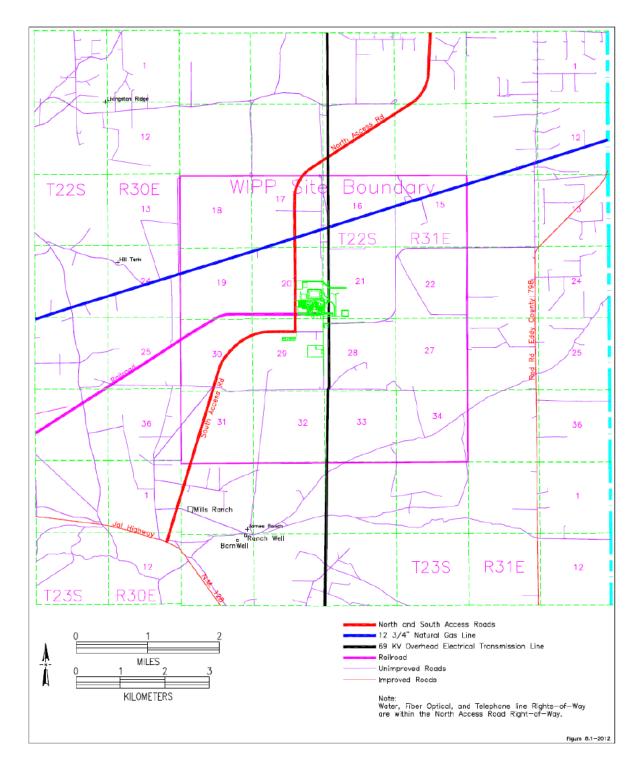


Demographic A-1 2018 CY – Active Mines in Eddy County Potash, Industrial Minerals, Aggregate & Stone



Sources: Eddy County Planning Department; New Mexico Department of Energy, Minerals, and Natural Resources; USA PHOTOMAPS; GOOGLE Earth

Demographic A-2 2018 CY – Active Mines Within a 10-Mile Radius of the WIPP Facility



Source: DOE/WIPP-93-004, Waste Isolation Pilot Plant Land Management Plan, Reprint 2019

Demographic B 2019 CY - Natural Gas Pipelines and Utilities In the Vicinity of the WIPP Land Withdrawal Area

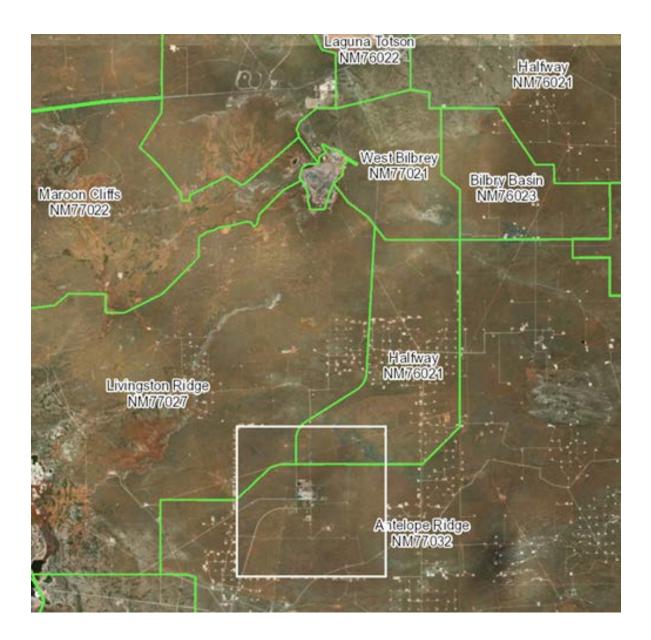
County 1	All Cattle			eef Cows Milk Cows			
County 1	2017	017 2018 2017 2018		2017	2018		
	(Head)	(Head)	(Head)	(Head)	(Head)	(Head)	
Bernalillo	8,300	8,800	(D)	(D)	(D)	(D)	
Catron	28,000	29,500	17,200	17,900	(D)	(D)	
Chaves	175,000	190,000	29,000	30,500	79,000	81,000	
Cibola	12,600	13,300	8,800	9,100	(D)	(D)	
Colfax	20,500	21,500	11,700	12,100	(D)	(D)	
Curry	240,000	250,000	8,700	9,000	82,000	86,000	
De Baca	17,200	18,100	10,800	11,300			
Doña Ana	88,000	93,000	8,300	8,600	34,000	33,000	
Eddy	56,000	59,000	18,000	18,600	8,000	8,900	
Grant	28,500	30,000	19,100	19,800	(D)	(D)	
Guadalupe	23,000	24,500	(D)	(D)			
Harding	22,000	23,500	12,800	13,300			
Hidalgo	28,500	30,000	17,500	18,200	(D)	(D)	
Lea	90,000	95,000	21,500	22,500	33,000	34,000	
Lincoln	29,500	31,000	19,000	19,700	(D)	(D)	
Luna	19,700	21,000	(D)	(D)	(D)	(D)	
McKinley	28,500	30,000	20,000	21,000	(D)	(D)	
Mora	14,800	15,600	(D)	(D)	(D)	(D)	
Otero	18,200	19,400	11,600	12,100	(D)	(D)	
Quay	34,000	36,500	18,200	18,900		(D)	
Rio Arriba	27,500	29,000	18,900	19,600	(D)	(D)	
Roosevelt	115,000	120,000	14,500	15,000	54,000	56,000	
Sandoval	16,600	17,600	11,300	11,800	(D)	(D)	
San Juan	22,000	23,000	14,000	14,500	(D)	(D)	
San Miguel	36,000	38,000	22,500	23,000	(D)	(D)	
Santa Fe	9,700	10,200	4,300	4,400	(D)	(D)	
Sierra	19,800	21,000	(D)	(D)	(D)	(D)	
Socorro	49,500	52,000	18,500	19,300	12,000	12,900	
Taos	(D)	(D)	5,800	6,000	(D)	(D)	
Torrance	45,500	48,000	(D)	(D)	(D)	(D)	
Union	65,000	68,000	(D)	(D)		(D)	
Valencia	33,000	35,000	10,500	10,900	9,000	10,000	
Other Counties	8,100	8,500	92,500	95,900	14,000	10,200	
New Mexico	1,430,000	1,510,000	465,000	483,000	325,000	332,000	

County Estimates: Cattle - New Mexico: January 1, 2017 & 2018

(D) Withheld to avoid disclosing data for individual operations. ¹ Counties with missing data are included in "Other Counties."

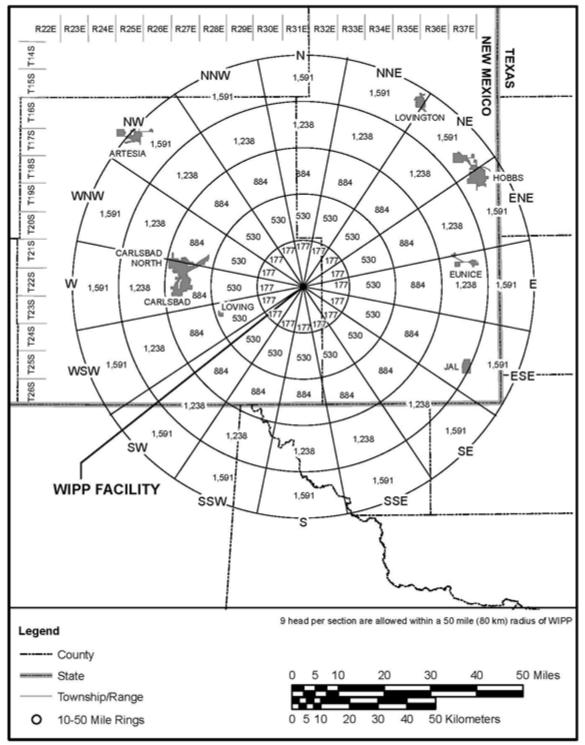
Source: USDA National Agriculture Statistics Service, New Mexico Agricultural Statistics

Demographic C-1 2018 CY - New Mexico Livestock (Cattle & Calves) Number by County



Sources: DOE/WIPP-93-004, Waste Isolation Pilot Plant Land Management Plan, Reprint 2019; Compiled by the Bureau of Land Management, National Operations Center, OC-530, BLM_GeoSpatialGateway@blm.gov

Demographic C-2 2019 CY – Grazing Allotments In the Vicinity of the WIPP Land Withdrawal Area



Sources: Bureau of Land Management; USDA National Agriculture Statistics Service, New Mexico Agricultural Statistics; New Mexico Cattle Growers Association

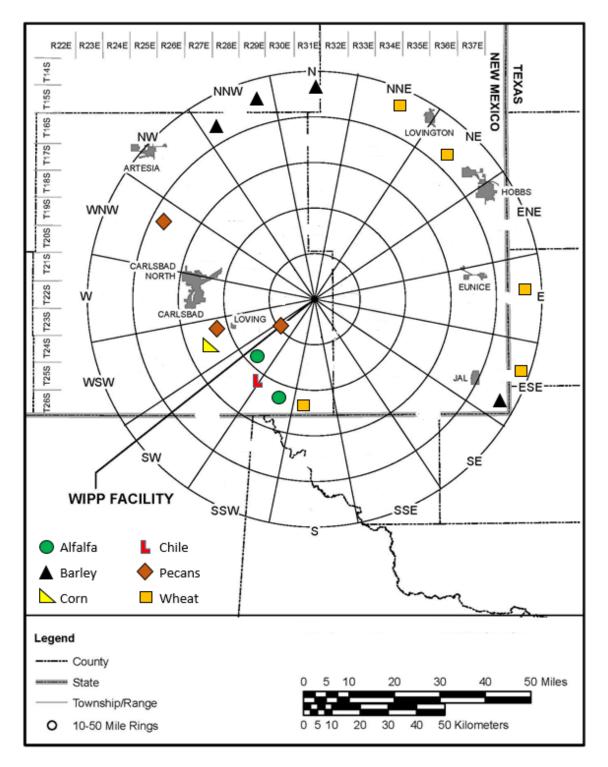
Demographic C-3 2019 CY – Maximum Allowable Yearly Cattle Density Within a 50-Mile Radius of the WIPP Facility County Estimates - New Mexico: 2018 Livestock Inventory, 2017 Crop Production

Census 2012		nty	L	Livestock – Jan 1, 2018		Head
55	1		Cattle	& Calves		59,000
1,141,95	6 734	-7-	Bee	f Cows		18,600
2,07	3 F	-14	Milk	Cows		8,900
\$119,564,00		-	Shee	p & Lambs		1,900
\$216,99	4 h <u>ri</u>					
\$189,25	2					
\$35,31	8 Crops 2017	Acres	Harv.	Yield	Production	Unit
	Cotton, Upland		5,800	1,134 1	13,700	Bales
		· ·				Tons Lbs
pounds per acre.		-	0,000	.,	,	
12	Lea County	/	Li	ivestock – Ja	n 1, 2018	Head
460			Cattle	& Calves		95,000
1,981,988		J.	Beef	Cows		22,500
4,309	FTATC	14	Milk	Cows		34,000
\$188,926,000			Sheep	& Lambs		1,500
\$410,708	hdr. 4					
\$374,667			L			
\$51,555	Crops 2017	Acres H	arv.	Yield	Production	Unit
	Cotton, Upland	17	,600	1,069 ¹	39,200	Bales
	Chaves Cour			iveeteek la	m 1 2019	Head
12	Chaves Cour	ity	L L	IVESIOCK - Ja	an 1, 2010	neau
595			Cattle	& Calves		190,000
2,482,827		JH	Beef	Cows		30,500
4,173		19	Milk	Cows		81,000
\$388,099,000			Sheep	& Lambs		18,100
\$652,267						
\$608,242			L			
\$59,098	Crops 2017	Acres H	arv.	Yield	Production	Unit
			·	1,296 ¹	8,100	Bales
	•					Tons Lbs
	55 1,141,95 2,07 \$119,564,00 \$216,99 \$189,25 \$35,31 pounds per acre. 12 460 1,981,988 4,309 \$188,926,000 \$410,708 \$374,667 \$51,555 pounds per acre. 12 595 2,482,827 4,173 \$388,099,000 \$652,267 \$608,242 \$59,098	551 1,141,956 2,073 \$119,564,000 \$216,994 \$189,252 \$35,318 crops 2017 Cotton, Upland Hay, Alfalfa Pecans pounds per acre. 12 Lea County 460 1,981,988 4,309 \$188,926,000 \$410,708 \$3374,667 \$51,555 Crops 2017 Cotton, Upland pounds per acre. 12 460 1,981,988 4,309 \$188,926,000 \$410,708 \$3374,667 \$51,555 Crops 2017 Cotton, Upland pounds per acre. 12 Chaves Court \$95 2,482,827 4,173 \$388,099,000 \$652,267 \$608,242 \$20047	1,141,956 Crops 2017 Acres \$119,564,000 \$216,994 \$189,252 \$35,318 Crops 2017 Acres pounds per acre. Cotton, Upland 3 1,981,988 4,309 \$188,926,000 \$410,708 \$188,926,000 \$410,708 Crops 2017 Acres H \$188,926,000 \$410,708 Crops 2017 Acres H \$188,926,000 \$410,708 Crops 2017 Acres H \$24,827 Crops 2017 Acres H Cotton, Upland 17 pounds per acre. Crops 2017 Acres H \$374,667 Crops 2017 Acres H \$388,099,000 \$652,267 Acres S \$388,099,000 \$652,267 Crops 2017 Acres H \$59,098 Crops 2017 Acres H Cotton, Upland 32 \$59,098 Crops 2017 Acres H 24 25 \$59,098 Crops 2017 Acres H 25 \$59,098 Crops 2017 Acres H 25	1 1	551 1,141,956 Cattle & Calves 1,141,956 2,073 Fills,9564,000 State \$216,994 Crops 2017 Acres Harv. Yield \$35,318 Crops 2017 Acres Harv. Yield Cotton, Upland 5,800 1,134 ¹ Hay, Alfalfa 21,000 6.50 pecans 5,500 1,891 pounds per acre. Livestock - Ja Cattle & Calves Beef Cows Milk Cows State Cattle & Calves Beef Cows Milk Cows State pounds per acre. Livestock - Ja Cattle & Calves Beef Cows Milk Cows Sheep & Lambs \$188,926,000 S410,708 Crops 2017 Acres Harv. Yield \$374,667 Crops 2017 Acres Harv. Yield Cattle & Calves Beef Cows Milk Cows Sheep & Lambs Sheep & Lambs Sheep & Lambs pounds per acre. Crops 2017 Acres Harv. Yield Cattle & Calves Beef Cows Milk Cows Sheep & Lambs Sheep & Lambs Sheep & Lambs Sheep & Lam	1,141,956 Crops 2017 Acres Harv. Yield Production \$119,564,000 \$216,994 \$189,252 \$35,318 Crops 2017 Acres Harv. Yield Production \$319,564,000 \$216,994 \$189,252 \$35,318 Crops 2017 Acres Harv. Yield Production Cotton, Upland \$5,800 1,134 ¹ 13,700 137,000 10,400,000 pounds per acre. Livestock - Jan 1, 2018 Cattle & Calves Beef Cows Milk Cows \$198,926,000 \$410,708 Crops 2017 Acres Harv. Yield Production \$374,667 \$5,1555 Crops 2017 Acres Harv. Yield Production pounds per acre. Cattle & Calves Beef Cows Milk Cows Sheep & Lambs Sheep & Lambs \$2,482,827 4,173 Cotton, Upland 17,600 1,069 ¹ 39,200 pounds per acre. Chaves County Livestock – Jan 1, 2018 Cattle & Calves Beef Cows \$388,099,000 \$652,267 \$608,242 Singe & Lambs She

¹ Cotton yields are measured in pounds per acre.

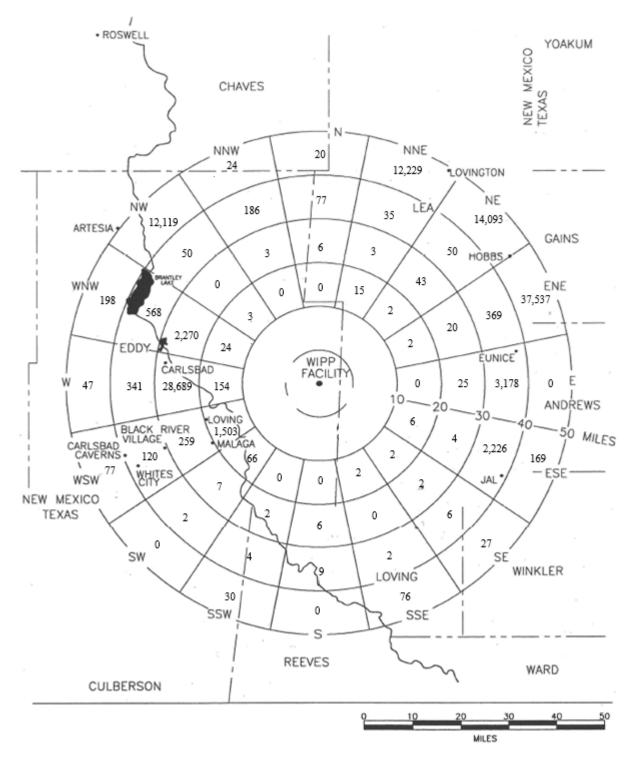
Source: USDA National Agriculture Statistics Service, New Mexico Agricultural Statistics, New Mexico Annual Bulletin

Demographic D-1 2017 CY – Major Crop Production Eddy, Lea, and Chaves Counties



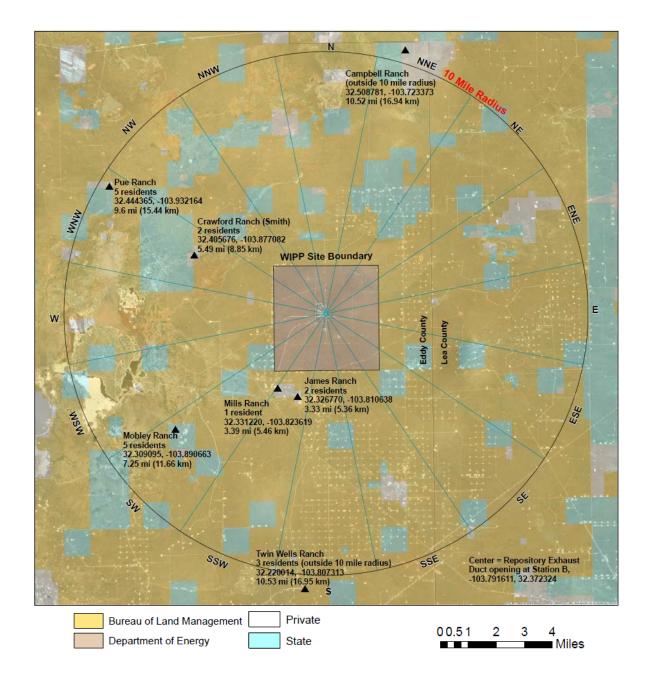
Sources: USDA Farm Service Agency; USDA National Agriculture Statistics Service, New Mexico Agricultural Statistics; New Mexico 2012 Census of Agriculture

Demographic D-2 2017 CY – Edible Agriculture and Commercial Crops Within a 50-Mile Radius of the WIPP Facility



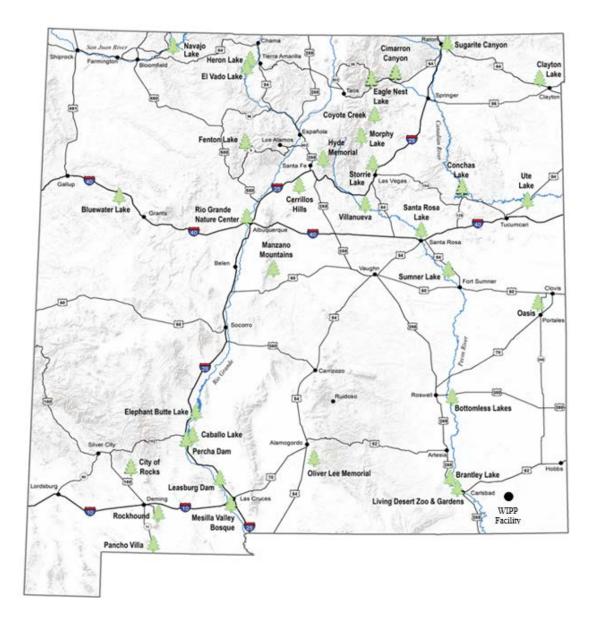
Source: Bureau of Business and Economic Research UNM; US Gazetteer, New Mexico

Demographic E-1 2018 CY – Estimated Populations of Major Town/City Centers Within a 50-Mile Radius of the WIPP Facility



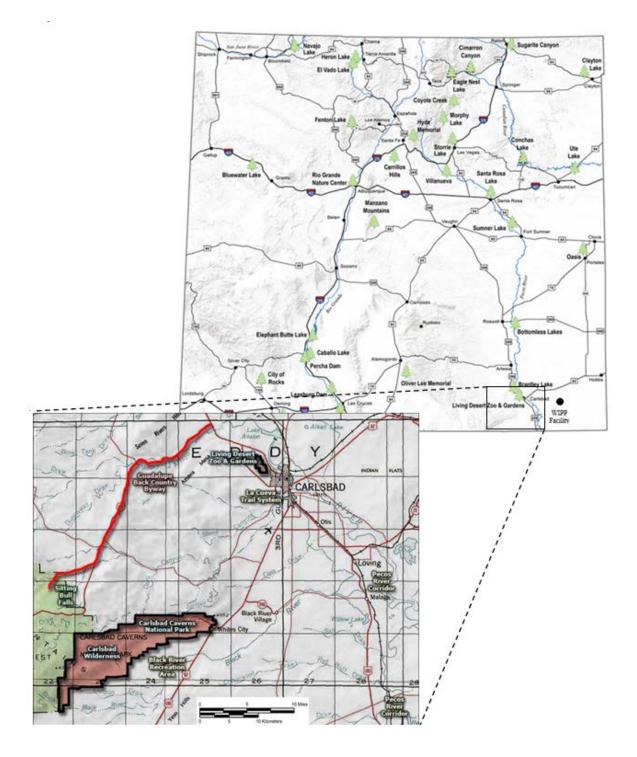
Source: Delaware Basin Drilling Surveillance Program

Demographic E-2 2018 CY – Estimated Ranch Populations Within a 10-Mile Radius of the WIPP Facility



Source: New Mexico Energy, Mineral and Natural Resources Department; http://www.emnrd.state.nm.us/SPD/

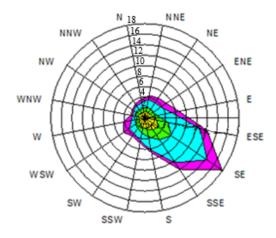
Demographic F-1 State Parks in New Mexico



Sources: New Mexico Energy, Mineral and Natural Resources Department, <u>http://www.emnrd.state.nm.us/SPD/;</u> National Geographic Topo, Eddy County, New Mexico, New Mexico Towns and Places, <u>http://www.thearmchairexplorer.com/new-mexico/eddy_county_new_mexico</u>

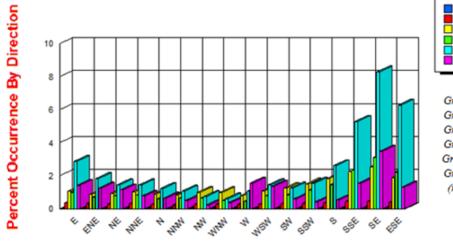
Demographics F-2 National Parks in New Mexico

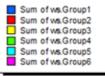


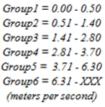


Group1 = 0.00 - 0.50
Group2 = 0.51 - 1.40
Group3 = 1.41 - 2.80
Group4 = 2.81 - 3.70
Group5 = 3.71 - 6.30
Group6 = 6.31 - XXX
(meters per second)

Sum of ws.Group6 Sum of ws.Group5 Sum of ws.Group4 Sum of ws.Group3 Sum of ws.Group2 Sum of ws.Group1
--





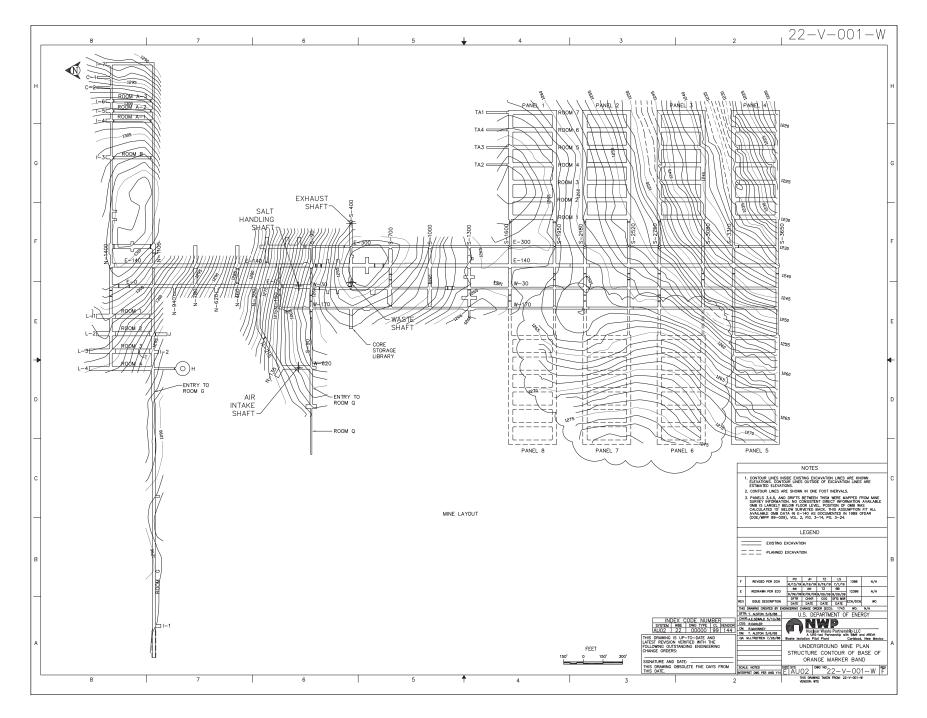


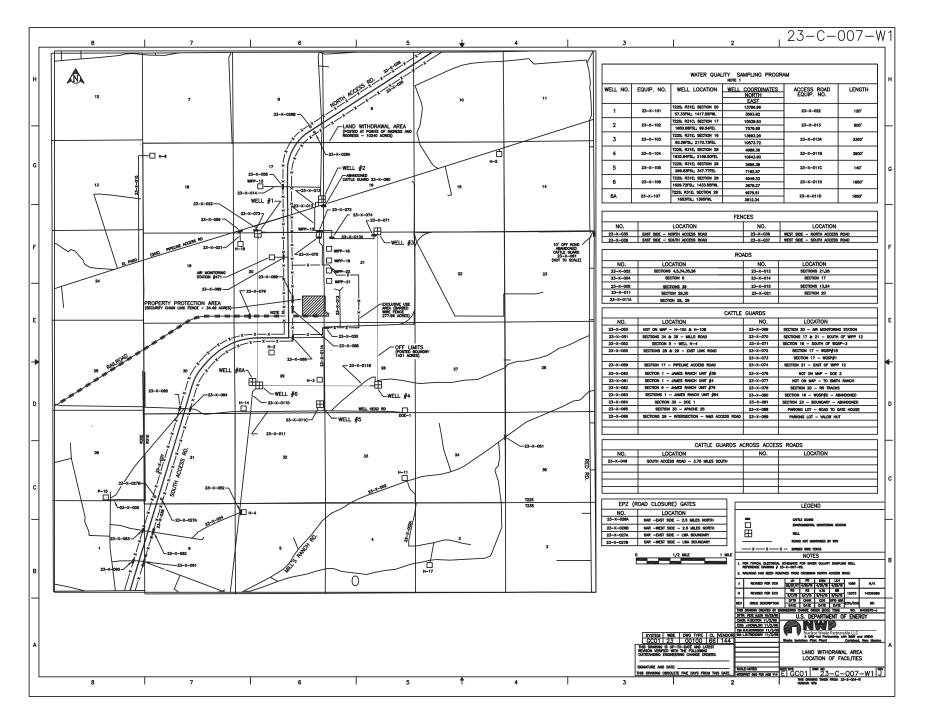
Source: WIPP Meteorological Station

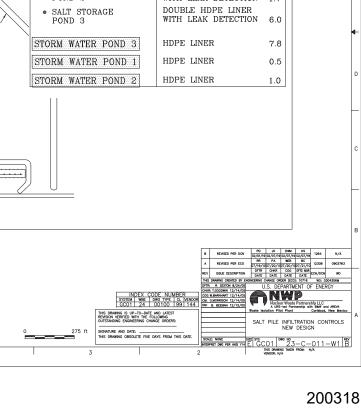
Demographic G 2013 – 2017 Wind Speed Direction Report WIPP Meteorological Station

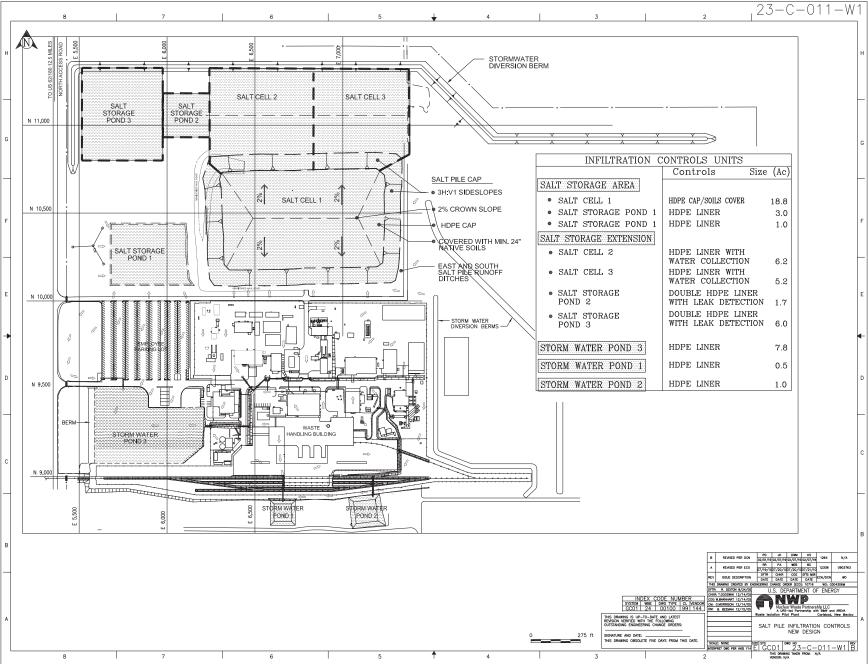
1		

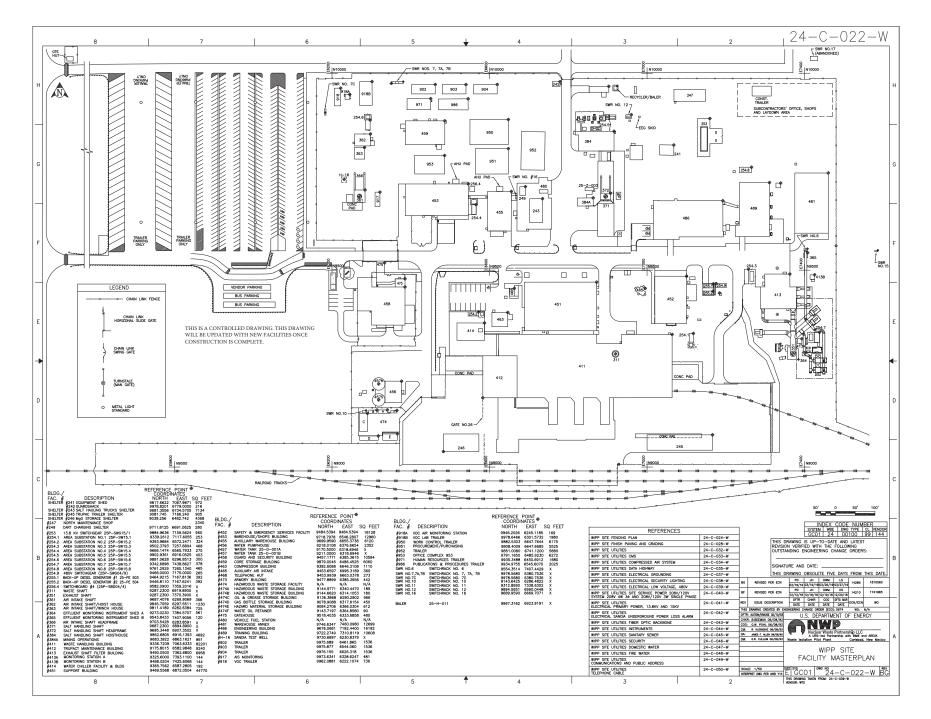
Drawings

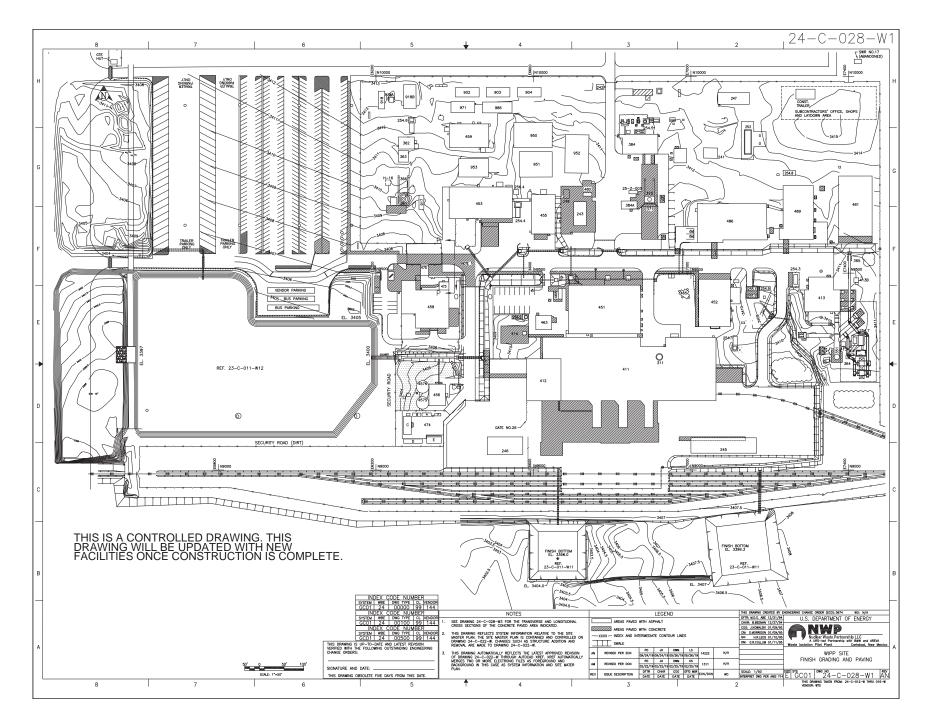


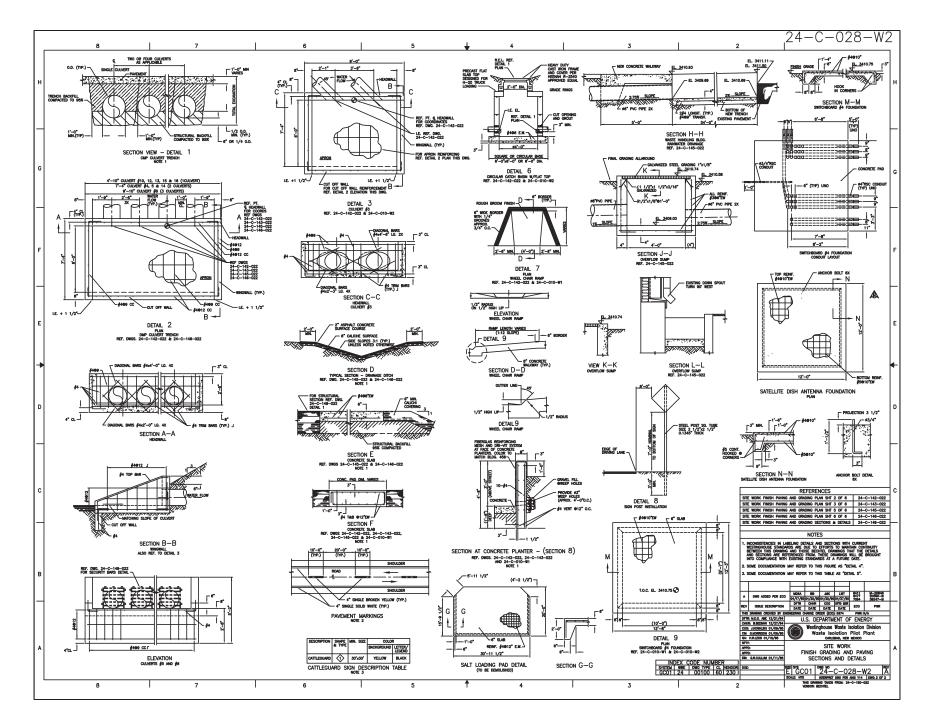


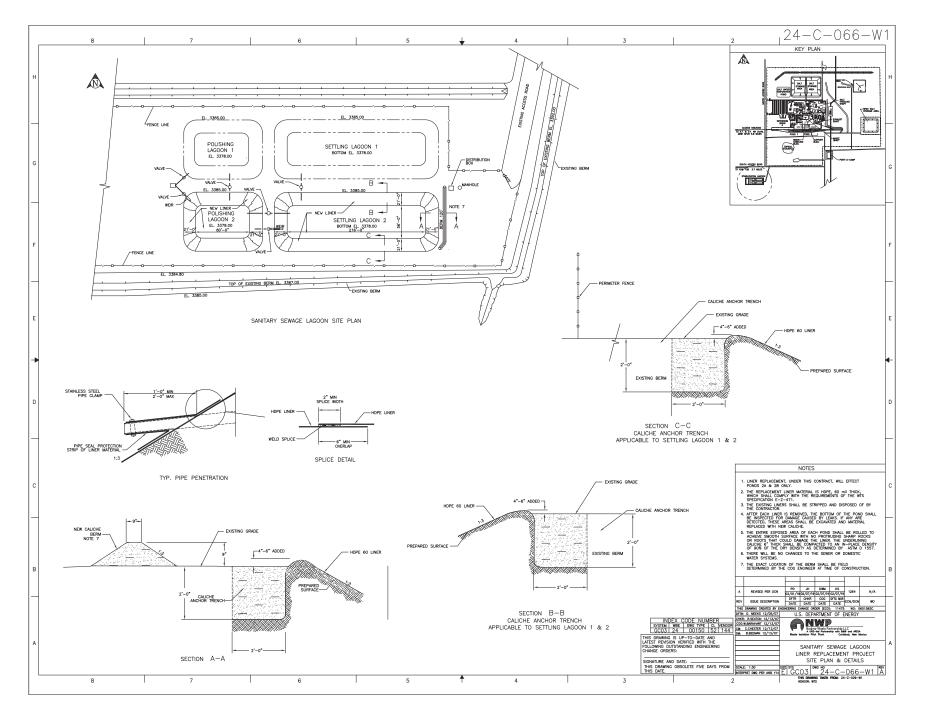


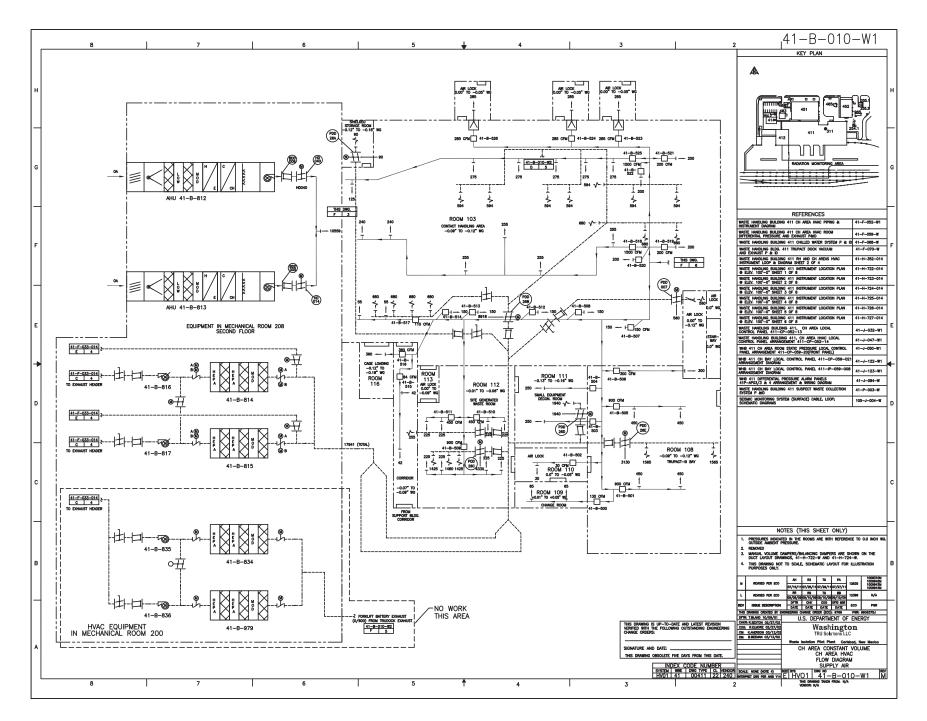


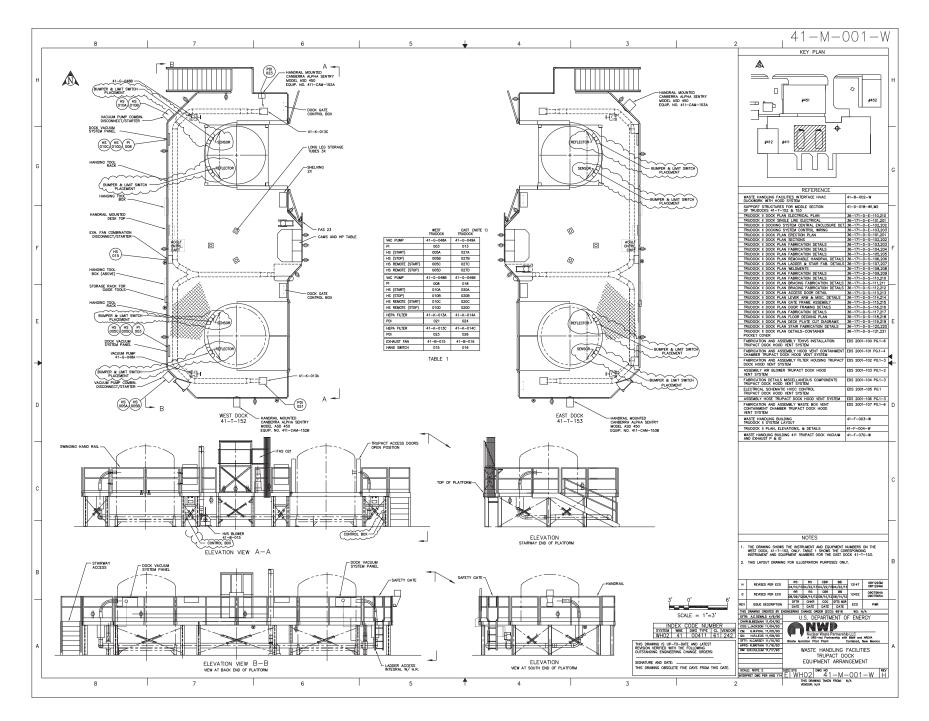


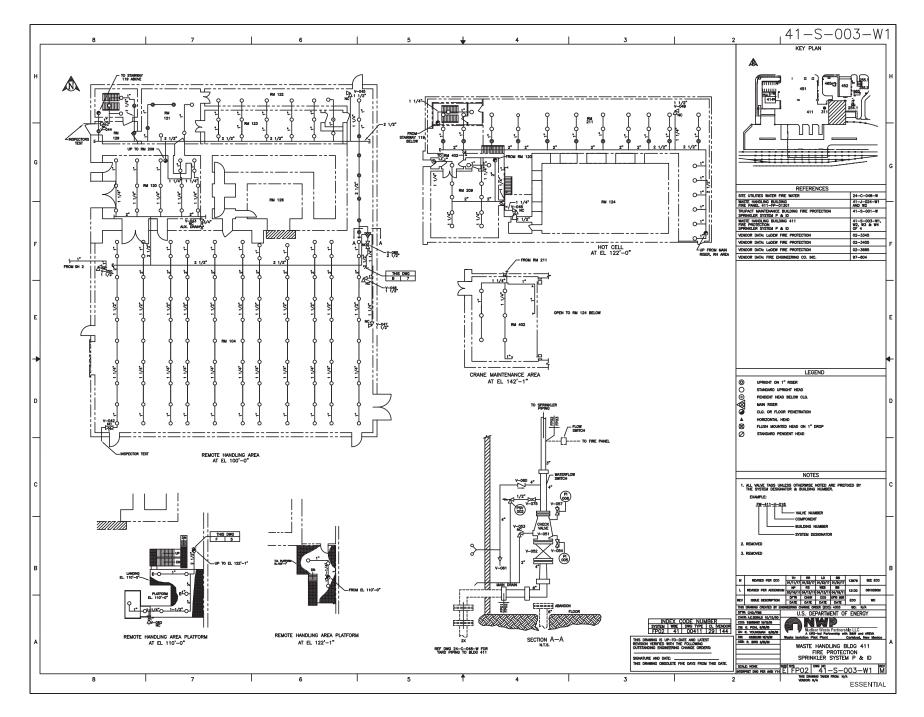


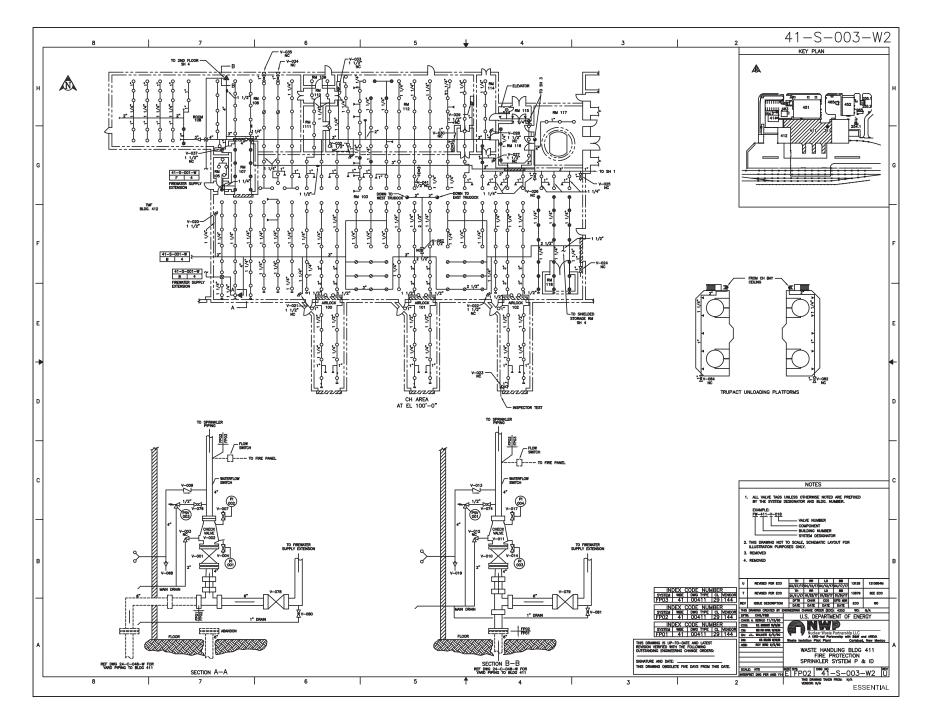


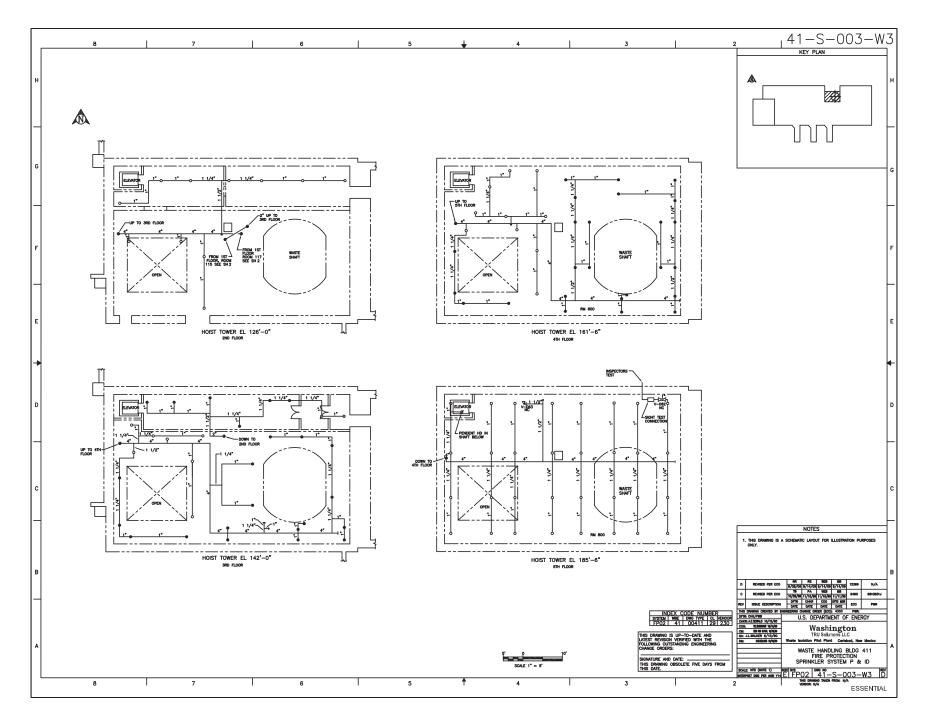


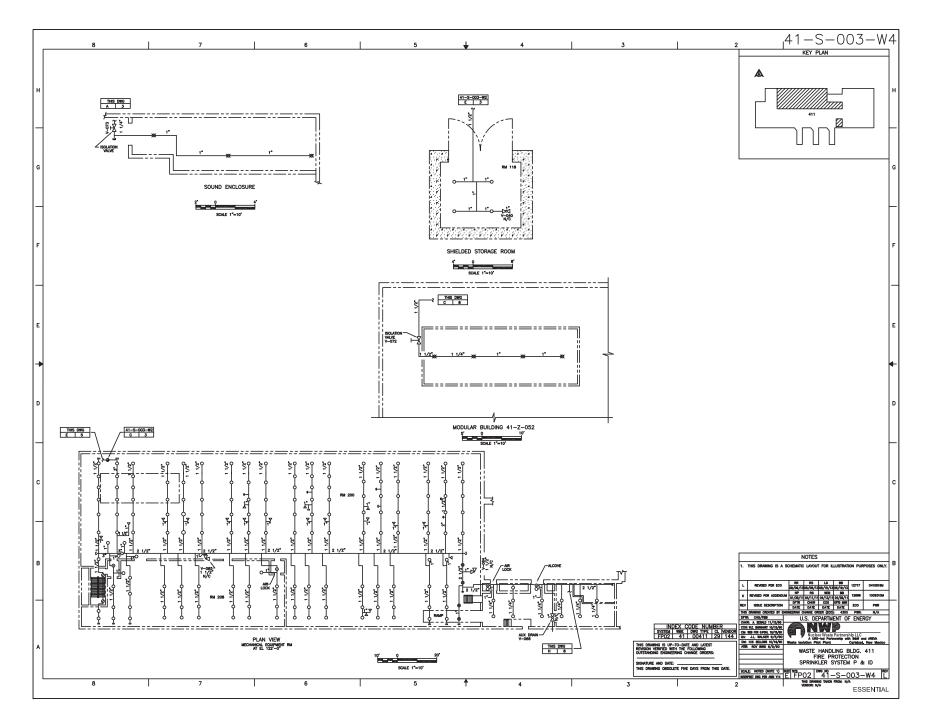


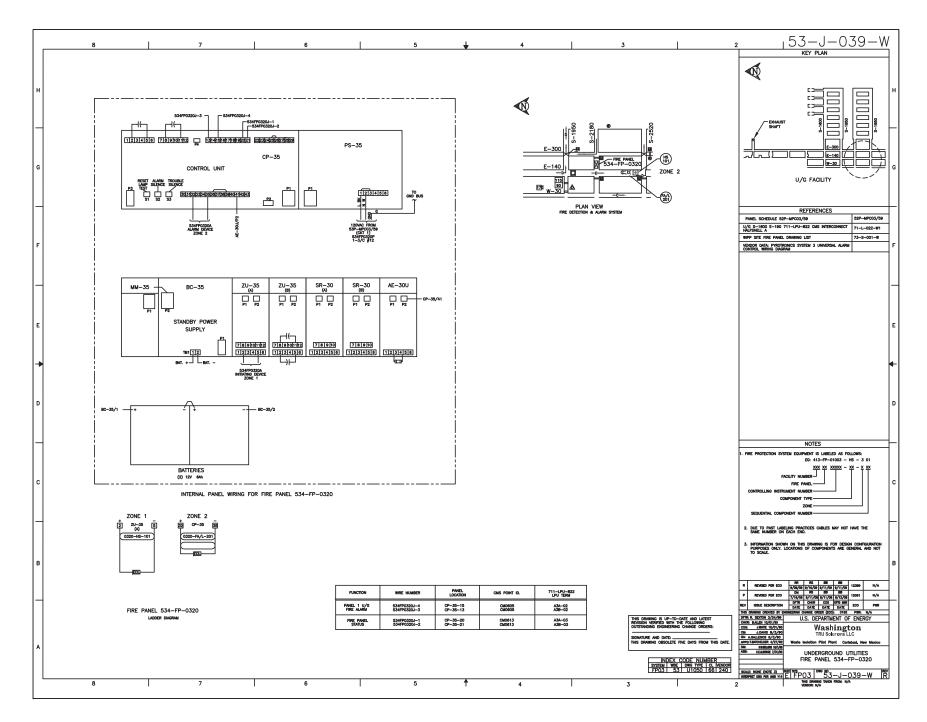


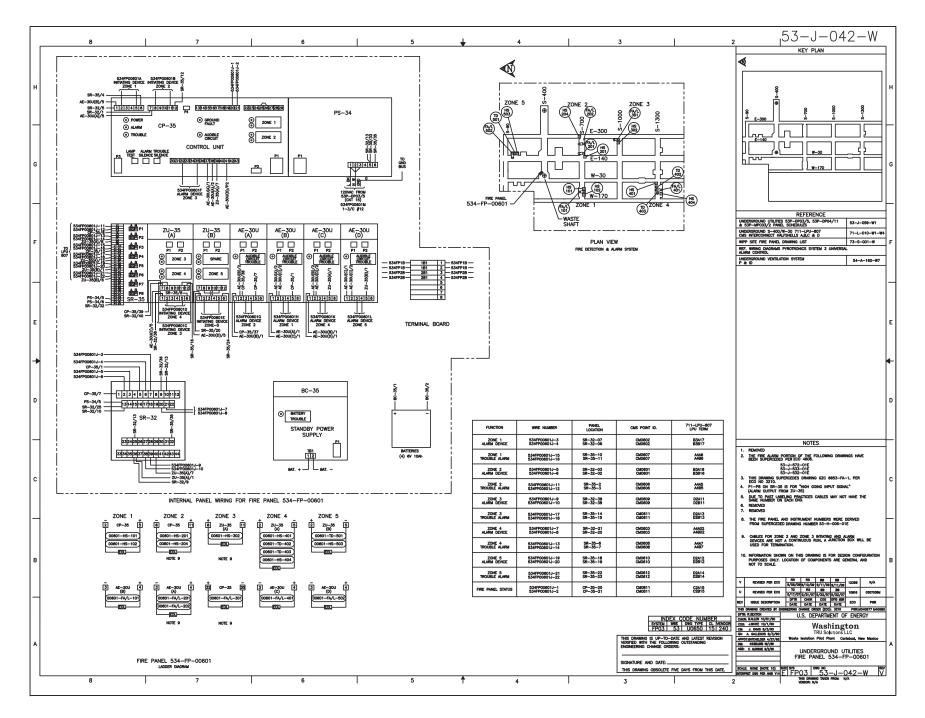


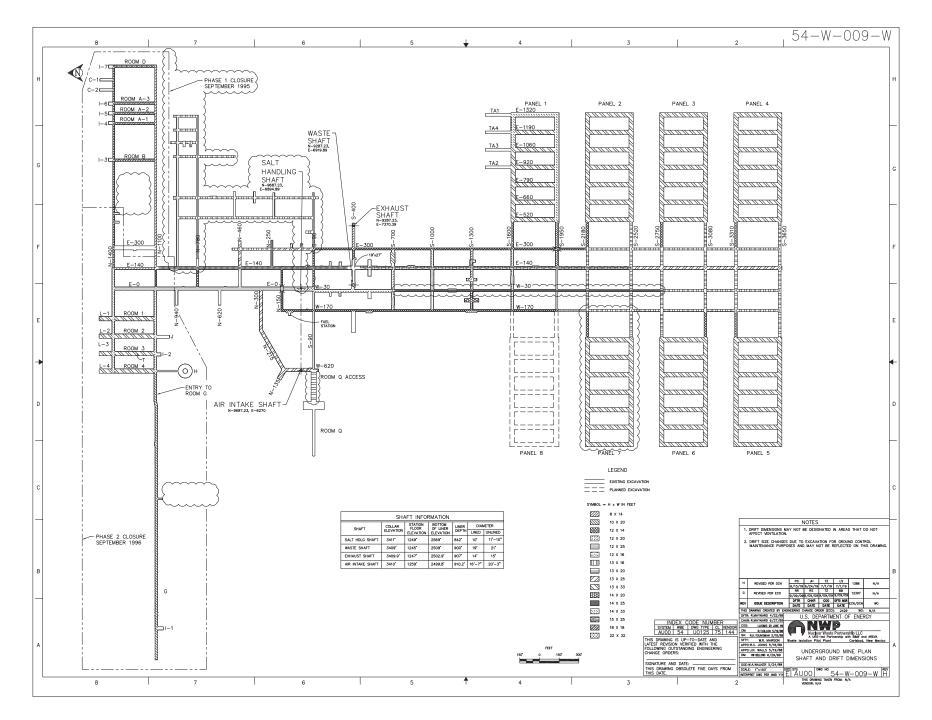












Public Participation Information

Public Participation Information

2 Introduction

On September 10 and 12, 2019, the Permittees held informational public meetings in
 Carlsbad and Santa Fe, New Mexico, respectively, to obtain input from the public regarding

the proposed scope of the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility

6 Permit Renewal Application (**Renewal Application**). The Permittees solicited comments

7 from the public through September 20, 2020.

In addition to the scoping meetings, the Permittees held pre-application meetings on the draft
 Renewal Application on January 23, 2020, in Santa Fe, New Mexico, and January 30, 2020,
 in Carlsbad New Mexico. These meetings were noticed in accordance with 40 CFR
 S424 24 (d) The public notice was provided in the following forms on December 40 and (or

\$124.31(d). The public notice was provided in the following forms on December 19 and/or
 20, 2019:

13	٠	Newspaper advertisements (in both English and Spanish; see Attachment 1),
14		published as a display advertisement, in newspapers of general circulation in the
15		county or equivalent jurisdiction that hosts the proposed location of the facility. These
16		newspapers included the Carlsbad Current Argus, Santa Fe New Mexican, and
17		Albuquerque Journal.
18	٠	A visible and accessible sign displaying the notice posted at the WIPP facility
19		entrance.
20	٠	A broadcast media announcement of the public notice on several local radio stations
21		via Carlsbad Radio, Inc.
22	٠	A copy of the newspaper notice sent to the New Mexico Environment Department,
		LLO Department of France (DOF) and present on the WIDD facility and list

U.S. Department of Energy (**DOE**), and persons on the WIPP facility mailing list.

Evidence of the required forms of public notice listed above is provided in Attachment 2.

Additionally, on December 20, 2019, the Permittees posted the draft Renewal Application to the WIPP web site for public review in advance of the January 23 and 30, 2020, preapplication meetings. An index of supplemental information was also posted. The Permittees posted the draft Renewal Application as a means of promoting public participation in the regulatory process. The public notice stated that the Permittees would accept written comments regarding the draft Renewal Application through Monday, February 3, 2020. This date was extended until February 20, 2020 at the request of several members of the public.

Comments received by the Permittees after the pre-application meetings by February 20,
 2020, are provided in Attachment 4.

The regulations at 40 CFR §124.31(c) state that the applicant shall submit a summary of the pre-application meeting(s), along with the list of attendees and copies of any written

comments or material submitted at the meeting(s), to the permitting agency as a part of the

part B application; these elements are provided in Attachment 3.

1	Attachment 1
2	Public Notice of Pre-Application Meetings
3	

Announcement of Pre-Application Public Meetings

Ten-Year Renewal Application for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit



WHO:	U.S. Department of Energy (DOE) Carlsh	oad Field Office and Nuclear Waste Partnership LLC (NWP).
WHAT:		duct meetings regarding the Ten-Year Renewal Application lation Pilot Plant (WIPP) Hazardous Waste Facility Permit, as Waste Management Regulations.
	management activities, as presented in community. To facilitate the solicitation	etings is to inform the community of proposed hazardous waste the draft Renewal Application, and to solicit questions from the n of questions, the draft Renewal Application will be posted to energy.gov on or before December 24, 2019.
	the expiration date of the current perm	ous Waste Facility Permit is ten years. At least 180 days before it (December 30, 2020), the Permittees must reapply for a new nerefore, be submitted to the New Mexico Environment Depart-
	management activities include receiving	st of Carlsbad, New Mexico, in Eddy County. Hazardous waste g, unloading, and storing transuranic (TRU) mixed waste on the aste in a geologic repository located 2,150 feet underground in a
WHEN:	Thursday, January 23, 2020 5 – 7 p.m.	Thursday, January 30, 2020 5 – 7 p.m.
WHERE:	Santa Fe Hilton 100 Sandoval St. Santa Fe, New Mexico	Skeen-Whitlock Building 4021 National Park Highway Carlsbad, New Mexico
COMMENTS:	•	egarding the draft Renewal Application through Monday, Febru- Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221, or to the

WIPP Information Center (<u>infocntr@wipp.ws</u>).

Spanish interpretive services will be provided at the meetings. Individuals requiring special access to participate in the meetings may notify Mr. St. John 1-575-234-7348 at least 72 hours prior to the meeting.

WIPP Permit Community Relations Plan

Online: <u>http://www.wipp.energy.gov</u> / toll-free: 1-866-271-9640 / email: <u>communityrelations@wipp.ws</u>

Anuncio sobre reuniones públicas previas a la solicitud

Solicitud de renovación por diez años del Permiso de la Instalación de Residuos Peligrosos para la Planta Piloto de Aislamiento de Residuos



- **QUIÉN:** La Oficina de Campo en Carlsbad del Departamento de Energía (DOE^{1*}) de EEUU y Nuclear Waste Partnership LLC (la Sociedad de Residuos Nucleares LLC o NWP^{*}).
- QUÉ: DOE y NWP (Titulares del Permiso) llevarán a cabo reuniones sobre la Solicitud de Renovación de Diez Años (Solicitud de Renovación) para el Permiso de la Instalación de Residuos Peligrosos para la Planta Piloto de Aislamiento de Residuos (WIPP^{*}), tal como lo establecen los Reglamentos de Nuevo México sobre la Administración de Residuos Peligrosos.

El propósito de las reuniones previas a la solicitud es de informar a la comunidad sobre las actividades propuestas para la administración de residuos peligrosos que se presentan en el borrador de la Solicitud de Renovación, y solicitar preguntas de la comunidad. Para facilitar la recepción de preguntas, se pondrá en el sitio web de WIPP el borrador de la Solicitud de Renovación a más tardar el 24 de diciembre de 2019; el sitio web es http://www.wipp.energy.gov.

El plazo efectivo para el Permiso de la Instalación de Residuos Peligrosos de WIPP es diez años. Por lo menos 180 días antes de la fecha de vencimiento del permiso actual (el 30 de diciembre de 2020), los Titulares del Permiso deberán solicitar un permiso nuevo. La Solicitud de Renovación, por lo tanto, será presentada ante el Departamento del Medioambiente de Nuevo México a más tardar el 3 de julio de 2020.

La instalación WIPP está ubicada 26 millas al este de Carlsbad, Nuevo México, en el Condado de Eddy. Las actividades de administración de residuos peligrosos incluyen recibir, descargar y almacenar en la superficie mezclas de residuos transuránicos (TRU) y deshacerse de las mezclas de residuos TRU en un depósito geológico ubicado a 2 mil 150 pies bajo la superficie en una formación salina estratificada.

CUÁNDO:	Jueves 23 de enero de 2020 5 a 7 de la tarde	Jueves 30 de enero de 2020 5 a 7 de la tarde
WHERE:	Santa Fe Hilton 100 Sandoval St. Santa Fe, New Mexico	Skeen-Whitlock Building 4021 National Park Highway Carlsbad, New Mexico

COMMENTS: Los Titulares del Permiso aceptarán comentarios por escrito sobre el borrador de la Solicitud de Renovación hasta el lunes 3 de febrero de 2020. Pueden enviar sus comentarios al Sr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221, o al Centro de Información de WIPP (<u>infocntr@wipp.ws</u>).

Habrá servicios de interpretación al español en las reuniones. Los individuos que requieren acceso especial para participar en las reuniones pueden notificar al Sr. St. John 1-575-234-7348 por lo menos 72 horas antes de la reunión.

Plan de Relaciones Comunitarias del Permiso de WIPP

En línea: http://www.wipp.energy.gov / teléfono gratuito: 1-866-271-9640/correo electrónico: communityrelations@wipp.ws

1	Attachment 2
2	Evidence of Required Forms of Public Notice
3	

6B THURSDAY, DECEME	ER 19, 2019 I CARLSBAD	Legal Notices	Legal Notices	Legal Notices	Legal Notices
Logal Hotics STATE OF NEW MESICO STATE OF NEW MESICO DEPARTMENT OUL CONSTRUCT DEPARTMENT OUL DEPARTMENT DEPARTMENT	Legal Notica Gatomoration, STR Corpo- Case No. 2022: Application of Ridge Runner, Resource- der pooling mineral Inter- ests within the Parkway der pooling mineral Inter- ests within the Parkway defacil, Store and Strategies of Ridge Runner, Resource- der pooling mineral Inter- sts within the Parkway defacil, Store and Strategies and 3, Townhip 19 Suth Range 30 East. NMEM. Eddy Comits, Rev Marco. Comits, Rev Marco.	Control of the Array Bone Series of the A	IONE ADMINISTRATION, UNITED STATES OF AMEN CONTROL ADMINISTRATION, UNITED STATES OF AMEN CONTROL ADMINISTRATION, UNITED STATES OF AMEN CONTROL ADMINISTRATION, UNITED STATES OF AMEN FRANCISCOMMENT of the seal association of the real property stated in Eddy monty known as 15 Cardinal Road, Artesia, NM 88210, and appointed the of the real property stated in Eddy monty known as 15 Cardinal Road, Artesia, NM 88210, and a the seal property (the "Thore, NMENT ADMINISTRATION CONTROL ADMINISTRATION ADMINISTRATION CONTROL ADMINISTRATIONAL ADMINISTRATIONAL CONTROL ADMINISTRATIONAL ADMINISTRATIONAL ADMINISTRATIONAL CONTROL ADMINISTRATIONAL ADMINISTRATIONAL ADMINISTRATIONAL CONTROL ADMINISTRATIONAL ADMINISTRATIONAL	control. The sale is to begin at 10:30m on January 56, 2020, Eddy County, Count County of Eddy, State of New Mexico, at which time I where the sale of the sale is sub- ful currency of the United Stries of America, the Prop- and Default Undgrenet en- tropy of the United Stries of America, the Prop- and Default Undgrenet en- ful currency of the United Stries of America, the Prop- and Default Undgrenet en- ful currency of the United Stries of America, the Prop- ent the sale is sub- tice to the sale is sub- rence of the sale is sub- leven the entry of an of the Strigger of the sale is sub- rence of the sale is sub- leven the entry of an of the sale NOTCE of FURTHER GIVIN that the real property cerned with herein will be sold subject to any and all ments, and all taxes and utility liens, special Master, for, and the purchaser at the sale taxes the property too, subject to the valua- to the sale taxes the property too, subject to the valua- tion of the sale is sub- tary to the sale is sub- to the sale taxes the property too, subject to the valua- tor and the purchaser at the sale taxes the property too, subject to the valua- tion of this site 137, and operating schedule of this fate air contaminant will be estima air contaminant will be lest that arrowed, Suite 1950, Dallas, Texa comments about construction or the made sale to art of the premi- to the address below: attrent on the tool the sale is the other and the sub- to the sale to the sale is the other attra of the premi- to the address below:	ton of the property by the County Assessor as real or per any popperty attribute trued home to the land, de- activation of tile to a mo- bid the property of tile to a mo- bid the property of the term romental contamination coning violations concern- ing the property. If any, em- tractions of the term shall take title to the above described real property sub- tor tedemption. PROSPEC- TWF URCHARGEN AT SALE AND THE STORMENT AND THE PROSPECTIVE TRANSFORMENT OF THE TILE AND THE CON- PETER THE AND THE CON- THE AND THE AND THE AND THE AND THE AND THE AND THE AND
ve substantially and specifical with the Office of the State E "ebruary 14, 2020. Facsimiles and-delivered or mailed and mark will be used to validate t state Engineer, 575-623-8559. will evaluate the application in	ly affected. The written prote ngineer, 1900 W. 2nd St. Ross (faxes) will be accepted as a ve postmarked within 24-hours c he 24-hour period. Protests ca If no valid protest or objectie accordance with the provisions Decembe	ding to file objections or pro- and include the writer's com- ess. The objection to the ap- defined the second second second second the second second second second second second second second second second second second second second second second second lide protest if the hard copy is if the facinite. Mailing post- in is filed, the State Engineer of Chapter 27 WARSA 1978. In 19. 26, 2019, January 2, 2020	cedures, or if you believe that program or activity, you ma NMED, 1190 St. Francis Dr., Su nd coordinator@state.nm.us.	any of NMED's non-discriminat you have been discriminated ay y contact: Kristine Yurdin, No ite N4050, P.O. Box 5469, Santa You may also visit our website a plaint-page/ to learn how and	gainst with respect to a NMED n-Discrimination Coordinator, Fe, NM 87502, (505) 827-2855, t https://www.env.nm.gov/non
Anuncio sobre re previas a la solic Solicitud de renovaciór la Instalación de Residu Piloto de Aislamiento d QUIÉN: La Oficina de Camp	euniones públicas situd 1 por diez años del Permi: 100 Peligrosos para la Pla	so de anta		lic Meetings ication for the ant ity Permit of Energy (DOE) Carlsbad	where to file a compaint of December 19, 2019
OUÉ: DOE y NWP (Titulares de Renovación de Diez Años de Residuos Peligrosos para como lo establecen los Regi Residuos Peligrosos. El propósito de las reuniones sobre las actividades propue se presentan en el borrador de la Solicitud de el borrador de la Solicitud de la Solicitud de la Solicitud de	del Permiso) llevarán a cabo re (Solicitud de Renovación) para la Planta Piloto de Alstamiento amentos de Nuevo México sob previas a la solicitud es de infr stas para la administración de de la Solicitud de Renovación, y ceopción de preguntas, se pon Renovación a más tardar el 24	e el Permiso de la Instalación de Residuos (WIPP), tal re la Administración de ormar a la comunidad residuos peligrosos que y solicitar preguntas de la drá en el sitio web de WIPP	WHAT: The DOE and NU Ten-Year Renewal Applib Pilot Plant (WIPP) Hazar Mexico Hazardous Wast The purpose of the pre- proposed hazardous wai Renewal Application, and the solicitation of questi	VP (Permittees) will conduc tation (Renewal Application dous Waste Facility Permit, e Management Regulations application meetings is to ste management activities, to solicit questions from th pons, the draft Renewal App p://www.wipp.energy.gov or	 of the Waste Isolation as required by the New inform the community of as presented in the draft community. To facilitate lication will be posted to
sitio web es http://www.wipp El plazo efectivo para el Perr diez años. Por lo menos 180 (el 30 de diciembre de 2020), nuevo. La Solicitud de Renov		uos Peligrosos de WIPP es imiento del permiso actual rán solicitar un permiso ntada ante el Departamento	The effective term for the least 180 days before the 2020), the Permittees mu will, therefore, be submit later than July 3, 2020.	WIPP Hazardous Waste Fac e expiration date of the curre st reapply for a new permit. tted to the New Mexico Env tted 26 miles east of Carlsba	ent permit (December 30, The Renewal Application rironment Department no

La instalación WIPP está ubicada 26 millas al este de Carlsbad, Nuevo México, en el

 CUÁNDO:
 Jueves 23 de enero de 2020
 Jueves 30 de enero de 2020

 5 a 7 de la tarde
 5 a 7 de la tarde

Santa Fe Hilton

100 Sandoval St. Santa Fe, New Mexico

Centro de Información de WIPP (infocntr@wipp.ws).

DÒNDE:

* Por sus siglas en inglés

La instalación fim le esta doctada zo rimais de ses de Garanis, neter mesco, en el Condado de Eddy. Las actividades de administración de residuos peligrosos incluyen recibit, descargar y almacamar en la superficie mezclas de residuos transuránicos (TRU) y deshacerare de las mezclas de residuos TRU en un depósito geológico ubicado a 2 mil 150 pies bajo la superficie en una formación salina estratificada.

COMMENTARIOS: Los Titulares del Permiso aceptarán comentarios por escrito sobre el borrador de la Solicitud de Renovación hasta el lunes 3 de febrero de 2020. Pueden enviar sus comentarios al Sr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221, o al

Habrá servicios de interpretación al español en las reuniones. Los individuos que

En línea: http://www.wipp.energv.gov / teléfono gratuito: 1-866-271-9640 correo electrónico: communityrelations@wipp.ws

uieren acceso especial para participar en las reuniones pueden notificar al Sr. St. John 1-575-234-7348 por lo menos 72 horas antes de la reunión. Plan de Relaciones Comunitarias del Permiso de WIPP

Skeen-Whitlock Building 4021 National Park Highway Carlsbad, New Mexico

The WIPP facility is located 26 miles east of Carlsbad, New Mexico, in Eddy County, Hazardous waste management activities include receiving, unloading, and storing transuranic (TRU) mixed waste on the surface and disposing the TRU mixed waste in a geologic repository located 2,150 feet underground in a bedded-salt formation. 0

WHEN:	Thursday, January 23, 2020 5 – 7 p.m.	Thursday, January 30, 2020 5 – 7 p.m.
WHERE:	Santa Fe Hilton 100 Sandoval St.	Skeen-Whitlock Building 4021 National Park Highway

	100 Sa	ando	/al St.	
:	Santa	Fe, N	lew Me	xico
		-		

COMMENTS: The Permittees will accept comments regarding the draft Renewal Application through Monday, February 3, 2020. Comments may be sent to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221, or to the WIPP Information Center (infocntr@wipp.ws).

Carlsbad, New Mexico

Spanish interpretive services will be provided at the meetings. Individuals requiring special access to participate in the meetings may notify Mr. St. John 1-575-234-7348 at least 72 hours prior to the meeting.

WIPP Permit Community Relations Plan

Online: http://www.wipp.energy.gov / toll-free: 1-866-271-9640 email: communityrelations@wipp.ws

Newspaper : Santa Fe New Mexican Issue Date : 12/19/2019

Advertiser : WESTINGHOUSE-WIPP Ad Number : 270706

New study shows half of American adults will be obese within 10 years

Puerto Rico to approve cockfighting, defying federal ban, cites 'tradition'

As word spread, those in the cockfighting industry cheered the

Cockingsing industry interest the news. "There's going to be work" exclaimed Domingo Ruiz, who owns more than 30 cocks and has spent more than half a century in the business. "We're going to keep the fight alive." Cockfighting generates an estimated \$18 million a year and employes some 27000 people

estimated SB million a year and employs some 2:2000 people, according to the bill approved by Puetro Rico's House and Senate Puetro Rico's House and Senate Puetro Rico's House and Senate Stabilishment in 6 formicipalities licensed by the island's Depart-ment of Sports and Recreation, said Secretary Adriana Siknchez. She defended the US government Hanned fights for economic and not animal welfare resears.

economic and not cancer in reasons. "Their instinct is to fight," she said of people in the business. "The people who dedicate them-

AAG

By Marilynn Marchione Associated Press

By Danica Coto

Puerto Rico will defy the U.S. government and approve a law to keep cockfighting alive in a bid to protect a 400-year-old tradition practiced across the island despite a federal ban that goes into effect this week, officials told the Associ-ted Dees con Userder widet.

a lederal ban that goes into effect this week, official told the Associ-ated Press on Tuesday night. The inner to brough splittly brains of the start of the federal law that President Donald Tump signed a year ago. "We are certainly challenging a federal law the President Donald Tump signed a year ago. "We are certainly challenging a federal law the Area Agaids, who co-authored the bill bid the AP. Wargues was scheduled to sign the bill Wednesday morning and that he expected the fight to end up in federal court.

Are you 62+?

so you can retire better.

FHA-insured reverse mortgage loans

Call me for more

(505) 690-1029

could help your savings last longer

information!

There's no way to sugarcoat this news: Nearly half of Amer-ican adults will be obese within a decade and one-quarter will be severely so, a new report predicts. It corrects for a weakness in previous estimates that may

A-4 SANTA FE NEW MEXICAN Thursday, December 19, 2019

It corrects for a weakness in previous estimates that may have made the problem seem not as big as it really is. Those estimates often relied on national health surveys and peopele tend to understate their weight in those. The new work used a decades-long federal study in which weight was massured to get a more accurate picture of trends and to project into the future. "It's alarming," said a nutrition expert with no be in the study. Dr. Lawrence Appel of Johns

Hopkins University. "We're going to have some pretty wridi problems" medically and finan-cially because so many people weigh too muck, he said. The published the study Wednesday. It was led by scientists at Harvard and George Washington univer-sities. Obesity naises the risk of heart disease, stroke, dishetse, sancer U.S. adults will be obese. In 29 states, more than half will be. About 24 percent will have severe obesity, which is "poised to become as prevalent as every

About 24 percent will mave severe obesity, which is "poised bebsity was in the 590s," the authors write. We have a several the 590s, "the authors write. The 590s, "the 1690s," the mast common weight actegory among women (28 percent), lacks (22 percent), lacks (22 percent), then system like a contradi-tion, but often people who can least afford food weigh the most common weight category in 44 states where average annual bousehold income is under \$20,000, but in only one state where income is over \$50,000. disease, stroke, diabetes, cancer and other health problems. It's gauged by body mass index, or BML, an easure of weight relation to height. Underweight or normal is 28 MU under 25 coverweight 30 05 38 m Sever 26 coverweight 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 38 m Severe 10 besis is 3 30 05 00 m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis is 3 30 00 besis m Severe 10 besis 3 30 00 besis m Se

ves care for them and train

selves care for them and train them." Animal rights activists have long pushed to end cockfights in U.S. territories, saying they are cruel and noting they are illegal in all 50 U.S. states.

in all 50 U.S. states. Wayne Pacelle, founder of the Washington-based Animal Wellness Action, said he doesn't believe the statistics on Puerto Rico cockfighting. "They are widely exaggerating the economic value," he said. "Watching animals elash each

"They are wike," by any any angle and a sequenting the economic walks," he stail. "Watching animals slash each other just for human entertains ment and gambling is not judged as a legitimate careform is particular to a state of the state of the The measure says it is legal for Puetro Rice to host cockfights as long as people don't export or import cocks or any goods or ser-vices related to cockfighting. The latter actions would violate the fiscen law, based on how Puetro Bioso officials interpret it.

NMLS# 9392 (www. nmlsconsumeraccess.org). American Advisors Group

(AAG) is headquartered at 3800 W. Chapman Ave., 3rd & 7th Floors, Orange CA, 92868. AAG conducts business in NM. AAG is an equal housing lender. These materials are not from HUD or FHA and were

Import plans for cheaper drugs advance under Trump

By Ricardo Alonso-Zaldivar WASHINGTON - The

NATION & WORLD

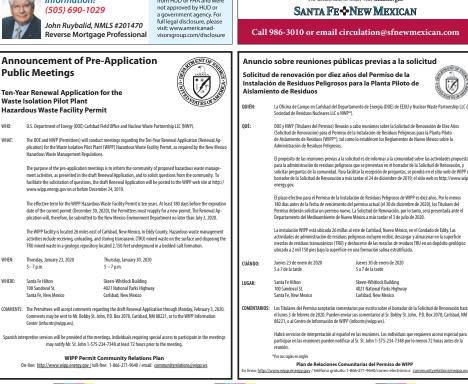
Through diministration, eague to show progress on prescrip-tion drug costs, on Wednes-day moved forward with its plan to allow Americans to stafely and legally get access to low-project medicines from a stars and the second stars of the second stars of the second stars of the second stars of the second second stars and the second star program and the second star program and stars of the second star second stars and stars of the second stars of the second stars of the second stars of the second star second stars and stars of the second stars of the second stars of the second stars of the second star second stars of the second star second stars of the second stars of the second stars of the second star second stars of the second stars of the second stars of the second star of the second stars of for patients covered by govern ment programs like Medicare. There are still some hurdles before Florida can start, the go

Administration has advanced alwaynal is producessors in trying to set up a supervised system for importing drugs. Medicines cost because the governments takes active role in setting prices. Health and Hannan Services Health Annan Services Health Annan Services Health Bandel Hannan Services Health Services industry lobbyin and safety

ASSOCIATED PRESS FILE PHOT The Trump administration is moving ahead with its plan to allow Americans to safely and legally get access to lower-cost pre-scription drugs from Canada.

ueure riorna can start, the gover-industry lobbying and safety "This is not easy stuff" DeStantis said. More work is needed, "but Id much rather be here moving





NATION

A6 ALBUQUERQUE JOURNAL

Woman accused of illegally entering Mar-a-Lago

Intruder was told to leave, but returned to take photos

ASSOCIATED PRESS FORT LAUDERDALE, Fla. — A Chinese national trespassed at President Donald Trumy's Mar-a-Lago tub Wednesday and was arrested when she refused to leave, police said, the second time this year a woman from that country has been charged with illicity entering the Florida resort.

time this year a woman from that country has been charged with illicity enverring the Florida resort. Jing Lor 56, was confronted by the private the returned to take photos. Palm Beach police spokesman Michael Ogrodnick said in an email. Palm Beach officers were called and arrested ber. It was determined she had an expired visa. Ogrodnick said. La was chermined she had an expired visa. Ogrodnick sid: La was chermined she had an expired visa. Ogrodnick sid: Beach Courty Jail. The president analy ice Michigan on Wotne-try and being being the Michigan on Wotne-try are stored and spend the holidays there. Lat's arrest is reminiscent of the March arrest of Yuling Zhang. a33 year-old Shanghah Dusiness-woman, who gained access to Mar-6-Lago while gear That led to initial speculation that she might be a syp. Ust he was never charged vith espio-nage and text messages she exchanged with a trip



A Chinese national trespassed at President Donald Trump's Mar-e-Lag club Wednesday and was arrested, police said, the second time this year a woman from that country has been charged with illicitly entering the resort.

organizer indicated she was a fan of the president and wanted to meet him or his family to discuss

and wanted to meet him or his family to discuss possible deals. Zhang was found guilly in September of tres-passing and lying to Secret Service agents and was sentenced last month to time served. She is being held for deportation. In another Mar-a-Lago trespassing case, a University of Wisconsin student was arrested in November 2018 after he mixed in with guests being admitted to the club. He pleaded guilty in May and received probation.

School 'bathroom bill' pre-filed in Kentucky

Legislation would limit bathrooms for use by transgender students BY VALARIE HONEYCUTT SPEARS

LEXINGTON, Ky. — A law-naker who is a Menifee County LEXINGTON. Ky. — A law-maker who is a Menifee County pastor has pre-filed for the 2020 Kertucky Ceneral Assembly a bill that would put limitations on which public school bathroom transgender students could use. The legislation would also allow lawsuits against school officials who did not carry out the prohibition.

officials who did not carry out the prohibiton. State Rep. David Hale, RWei-lington, has pre-filed The Ken-tucky School Privacy Act, bring-ing back legislation that has a state of the state of the state of the main state of the state of the main state of the state of the main state of the state of the hale or a nother lawmaker. On Tuesday, Hale said the bill had been co-sponsored by several lawmakers in the past and sev-eral had asked to co-sponse the legislation in the 2020 General Anemuly.

Assembly. The legislation sponsored by Hale requires students born male to use only those facilities designated to be used by males and students born female to use

superstand of the second secon

Boy gets to ride a unicorn before his brain surgery

Kindergarten class parents quickly organized party BY MERYL KORNFIELD THE WASHINGTON POST

of Fallon, Montana. The party let the class say goodbye to Wyatt before he left last week for St. Jude Children's Research Hos-pital in Memphis. He was diagnosed last month with medulloblastoma, a cancer-oue break turner. Doc ous brain tumor. Doctors at St. Jude hope to remove the tumor this week.

WHO:

WHAT:

WHEN: Thursday, January 23, 2020 5 – 7 p.m.

WHERE: Santa Fe Hilton 100 Sandoval St. Santa Fe, New Mexico



STOLENT OF STA

 \checkmark

D STATES OF N Announcement of Pre-Application Public Meetings Ten-Year Renewal Application for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit

U.S. Department of Energy (DOE) Carlsbad Field Office and Nuclear Waste Partnership LLC (NWP).

u.s. opepartment or Energy UOE) Carisbad Field Office and Nuclear Waste Parimership LLC (NMP). The DOE and NMP (Permittees) will conduct meetings regarding the Ten-Year Renewal Application (Fenewal Application) for the Waste location (File Plant (MIPP) Hazardous Waste Raciting Yermit, as required by the New Moxico Hazardous Waste Management Required) as presented in the draft Renewal Application, and the solid questions from the community of proposal hazardous waste management advilles, as presented in the draft Renewal Application, and to solid questions from the community. To facilitate Renewal Application, and to solid questions from the community. To facilitate Renewal Application, and to solid questions from the community. To facilitate Renewal Application super sensition dato the current permit (December 30, 2020), the Permittees must reapply for a new permit. The Renewal Application full therdrone, be submitted to the New Moxico Chroment Department no later than July 3, 2020. The With Racitly is located 26 miles east of Carlsbad, New Mexico, in Eddy Courty, Hazardous waste management advilles, include receiving, unloading, and mined waste in a gelobio repository located 2, 150 feet underground in a bedded-salt formation.

COMMENTS: The Fermittees will accept comments regarding the draft Bereval Application through Mentay, February 3, 2020. Comments may be sent to Mr. (Bobby St. Science), 2027, Cartiblad, NM 99221, or to the WIPP Information Center reflecting Weigo WS).

Spanish interpretive services will be provided at the meetings. Individuals requiring special access to participate in the meetings may notify Mr. St. John 1-575-234-7348 at least 72 hours prior to the meeting.

WIPP Permit Community Relations Plan On-line: www.wipp.energy.gov/toll-free: 1-866-271-9640/email: communityrelations@wipp.ws

Thursday, January 30, 2020 5 – 7 p.m.

Skeen-Whitlock Building 4021 National Park High Carlshad, New Mexico

The party, held days before his surgery, was organized by Jennifer Nielsen, a mother of one of Wyatt's classmates. "It really hit home because my son is the same age and it could be us," Nielsen said. The idea for a party came to Nielsen as she drove her son, Landon, to school. She messaged other parents, who, within hours, offered to bring party supplies, two cakes and fruit jude. Nielsen's family owns a cattle ranch, and one of their horses, Bonanza, is a luminescent white. Anoth-

which of his stuffed ani-mals - some as tall as he is - to bring to St. Jude, he ed her snower mother offered her snow-white pony, Lily. The pair were cast as white pory, Lily, The pair were cast as solors of the rainbow with solors of the rainbow with solors of the rainbow with with these dasks with the dores at character the cover sphoto of a Face-tachry Haas, a machtin-the cover photo of a Face-tachry Haas, a machtin-the das and victor a tuil wege dask with unicorns. the dask of the analysis of the rainbow with unicorns is dask face-tachry Haas, a machtin-the dask of the rainbow with unicorns is dask face-tachry Haas, a machtin-the dask of the dasks with unicorns is utified wege dask with with the helf for the surgery.

The family is hoping to cover Wyat's medical expenses with a GoFund-Me account that has raised more than \$8,000. The family has also received support from sev induction and the second received support from sev induction at the end of july. Zachry Haas said, People from neighboring towns follow Wyatt's Face-book page and send gifts and cards. One class at another elementary school made a mural of unicorn drawings. "I's not an amazing situ-ation, but just seeing how awesome everyone is gives us hope." Zachry Haas said.



le Roofing. At Dreamstyle Roofing, v superior experience that means you ort of your home worry free for years njoy style Remodeling proudly offers GAF roofing, vide array of options to match your home, tast

dget



200318

white pony, Lily. The pair were cast as unicorns and painted the corns and painted the corns in the paint were cast as which three days notice, half the class attended the party at a local part on Saturday, Dec. 7. Each child got a unicorn ride, includ-ing Wyatt who is obsessed with unicorns. Sock page Wyatt's parents: made about his progress, called Wyatt's Journey, shows Wyatt in a hospital bed sandwiched between two unicorn stuffed aumals.

Newspaper : Albuquerque Journal Issue Date : 12/19/2019 Advertiser : NUCLEAR WASTE PARTNERSHIP LLC Ad Number : 000147144102

ALBUQUERQUE JOURNAL

NATION & WORLD

What will Boris Johnson do? **UK leader to unveil plans**

Brexit deal, public spending top list

BY JILL LAWLESS AND DANICA KIRKA

BARD LANCES MULLES & MULLE

Agreement Bill, the law need-ed to make Brexit a reality. It must become law before Jan. 31 if Johnson is to stick to his timetable, and the government plans to hold the first signifiread by the monarch from atop a golden throne — will give the British public some idea of what drives Johnson, a politician whose core beliefs remain a mystery, even to his allies. He sometimes acts like a

timetable, and the government plans to hold the first signifi-cant vote on it Friday. The bill commits Britain to leaving the EU on Jan. 31 and to concluding trade talls with the bloc by the end of 2020. Johnson more delays - a wore that has set off alarm bells among busi-nesses, which hear that means the country will face a "no-deal" Brexit athe strat of 2021. Trade experts and EU offi-cials say striking a free trade deal within 11 months will be a struggle. EU Commission President Ursula von der Leyen called the timetable "extremely challenging." Mitchel Barriler, the EU's chief Brexit negotiator, stal "its det time todo everything Bure can." Thursday's soech is allow

ied time, todo everything Bar, we will do everything we can' "Thursday's speech is also set to include a bill to overhaud Britain's immigration system after Brexit, when RU citizens will lose the automatic right to live and work in the UK. Beyond Brexit, there's likely to be a spending boosf for the Nasional Health Service, which has strugged to keep up with growing demand during a decadelong funding squeeze by previous Conservative governments.



THURSDAY, DECEMBER 19, 2019 A7

Freelance journalist Shiori Ito, right, is congratulated by her sup-porters after winning a lawsuit against former reporter Noriyuki

Tokyo court awards damages in high-profile rape case

Case was originally dropped by prosecutors

BUDDEL DI PUBECTUOIS BY MARI YAMAGUCH ASSOCHED PRESS TORYO – A Tokyo court awarded damages to a freelance journalist on Wednesday in a high-profile rape case that had been dropped by Japanese pros-ecutors. The landmark ruling was welcomed by equal rights activitis, but underscores legal and social hurdles in a country where sexual assault victims are will stimmarted.

c and psychological pain. Ito, who has become the face of Japar's slow-moving #MeToo movement, filed the civil suit in 2017 after prosecutors chose not to charge Yamaguchi. She demanded \$200.540 in damages and sought to find out why pross-Wamaguchi has denied any wrongbring in published articles and on social media. savine they been dropped by Japanese pros-ecutors. The landmark ruling and on social medica, saving they had see by consent. He filed a countersuit this year, demand-ing she pay \$1.2 million for alleg-edly damaging this reputation by activity, but underscores legal was well strangering. The Tokyo District Counters The Tokyo District Counters this strangering the second second second ordered Nortyukh amaguchi, a sin havom for cost issis Drime Minister Shinzo Abe and other conservative politicians, to pay \$30,30 to journalist Shinor Ito, who filed a civil usit against him seeking compensation for physi-

Australia reports hottest day ever, expects another record

ASSOCIATED PRESS SYDNEY — Australia experi-enced its hottest day on record, and temperatures are expected to soar even higher as a heat wave covers most of the country. The Australian Bureau of Meteorology said the average temperature across the country of 105 digrees Tuesday beat the of 105 digrees Tuesday beat the "This hot air mass is so exten-"This hot air mass is so exten-

"This hot air mass is so exten-sive, the preliminary figures show that yesterday was the hot-test day on record in Australia, beating out the previous record

from 2013, and this beat will only intensity? Vauroau meteorological Diana Eadie said in a video statu-ment Weithesday. On Weithesday. Soared (o 116 in Birdsvilla). Goren, Western Australia. Moren Vaulta and the Birdsvilla. Soared (o 116 in Birdsvilla). Goren, Western Australia. Diana Eadie said in a video statu-garera on recordidions are forecast doren, Western Australia. The highest temperature reso aby recorded in any location in January 1960, at Oodnadatta, a desert settlement in South Australia. High temperatures and strono winds are also fanning bush



THENT OF ENE

D STATESOF N

jumps from the Port Noarlunga Jetty on Tuesday in Adelaide, Australia, as a heat wave grip:

Russia sanctions advanced by Senate Foreign Relations Committee

Future of DASKA with the full Senate remains unclear

BLOOMBERG NEWS WASHINGTON - The

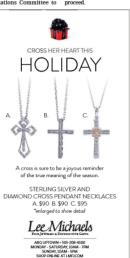
WASHINGTON — The Senate Foreign Relations Committee approved sanc-tions on Russin for med-ding in the 2016 election, despite resistance from the Trump administration and concerns about collateral economic damage. The Republican-led panel voted 17-5 to advance the bill that would sanction Russian individuals, cyber operations and liquid natu-ral gas export facilities. It calls for the president to prescribe regulations led prescribe regulations led sized 90 dives after the late

toreaction are galaxies of the second can Lindsey Graham and New Jersey Democrat Bob Menendez.

Menendez. Graham called the leg-islation the "sanctions bill from hell" when he first introduced it in August introduced it in August 2018, referring to the harsh provisions including the restrictions on Russian sovereign debt. He intro-duced a revised version of the bill, S. 482, earlier this year.

Concerns about foreign influence in next year's election has brought a

renewed focus on Russia's interference in the 2016 election, and the commit-tee's Democratic minority pressured Republicans to act on the measure. Two industry groups — the Chamber of Commerce and the American Petro-leum Institute __wrote to oppose the measure ahead of its consideration. of its consideration. It's unclear if Senate Majority Leader Mitch McConnell would bring the DASKA Act to a vote in the full Senate. Foreign Rela-tions Chairman Jim Risch opposes the measure, even beauth he alleward Wordman opposes the measure, even though he allowed Wednes-day's committee vote to proceed. leum Institute — wrote to members of the Foreign Relations Committee to



Anuncio sobre reuniones públicas previas a la solicitud Solicitud de renovación por diez años del Permiso de la Instalación de Residuos Pelígrosos para la Planta Piloto de Aislamiento de Residuos QUIÉN: La Oficina de Campo en Carlsbad del Departamento de Energía (DOE*) de EEUU y Nuclear Waste Partnership LLC (la Sociedad de Residuos Nucleares LLC o NWP*) Nuclear "Weate Partnership LLC da Sociedad de Readons Nuclearies LLC o NWP+ DCE y NWP (Thates del Partnership) ILC da Sociedad de Readons Nuclearies LLC o NWP+ Instalación de Diez Años (Solicitud de Renovación) para el Parmiso de la Instalación de Residure Parigrosco para la Parta Paloto de Alsaineitos de Residuros (NIPP), tal como fo establecen los Reglamentos de Nuevo México sobre el Administración de Residure Parigrosco. El dor las actividades proposados para la Parta Paloto de Jasaines el administración de Residure Parigrosco. El dor las actividades proposados para la Parta Paloto de Jasaines de las actividades proposados para la da atministración de residuos pelígrosco es presentan en el formador de la Solicitud de Renovación y solicitar preguntas de la comunidad. Para facilitar la recepción de preguntas, se pontá en el sitio web el MPP el hormador de la Solicitud de Renovación en meis tardar el 24 de diciembre el de 23 de diciembre de 2020, los Titulares del Permiso deberán solicitar un el parmiso nuevo. La Solicitud de Renovación en los eleberáns andiciata ante el barros de las Medicambiento de la Solicitud de Renovación en de vencimiento de permiso actual (el 30 de diciembre de 2020), los Titulares del Permiso deberán solicitar un el barros del Medicambiento de Nacio Cambia con de Renovación de la Cartada, Nacevo México, no de la presenta nel Medicambiente de Nacio Renovación de Cartados, Nacevo México, na OUÉ: 2020. La instalación WIPP está ubicada 2º o illinias el estó de catistada, Navov Marico, en el Contado de Eddy. Las actividades de administración de residuos poligrosos incluyen recibir, descargar y almaconar en la superficie mecidas de residuos transurativas (TRIU) y definaceme de las mecidas de residuos TRI en un depúdio transurativas de mil 150 pelos bios a superficie en un softwato establicada está en esta de las mecidas de residuos TRI en un depúdio sentificada. Jueves 23 de enero de 2020 5 a 7 de la tarde CIIÁNDO-Jueves 30 de enero de 2020 5 a 7 de la tarde DÓNDE: Santa Fe Hilton 100 Sandoval St. Santa Fe, New Mexico Skeen-Whitlock Building 4021 National Park Highway Carlshad, New Mexico COMENTARIOS: Los Titulanes del Permiso acorparán comentarios por escrito sobre el borrador de las Solicitud de Renovación hasta el lunes 3 de febrero de 2020. Preden enviar sus comentarios el 5.º Society St. John, P. O. Bora 2076, Cartisbad, NM 88221, o al Centro de Información de WIPP (infocmtr@wipp.ws). Habrá servicios de interpretación al español en las reuniones. Los individuos que requi acceso especial para participar en las reuniones pueden notificar al Sr. St. John 1-575-524-7348 por lo menos 72 horas antes de la reunión. Plan de Relaciones Comunitarias del Permiso de WIPP

En línea: www.wipp.energy.gov / teléfono gratuito: 1-866-271-9640 correo electrónico: communityrelations@wipo.ws * Por sus siglas en inglés



CARLSBAD RADIO, INC PO Box 1538 CARLSBAD, NM 88221

Nuclear Waste Partnership

4021 National Parks Hwy

Carlsbad, NM 88220

Nuclear Waste Partnership

Advertiser ID: 3467 Am	ount Paid
3467-00003-0000	12/31/2019 1
Official Invoice	Date Page
DETACH AND RETUR	N WITH PAYMENT

3467-00003-0000

O 12/31/2019

1

Purchase Order Number: Khush Est. Number: Co-Op: Description: 10 Year Renewal Salesperson: Hughes, Don

DUPLICATE INVOICE

	<u>г</u>					
Date	Day	Length		Qty	Rate	Total
12/4/2019	Wed		KCDY-FM 10 Year Renewal			\$500.00
12/19/2019	Thu	1:30	KAMQ/ESPN-/ 08:42:00 AM	1	1 \$0.00	\$0.00
12/20/2019	Fri	1:30	KAMQ/ESPN-/ 09:11:30 AM	1	\$0.00	\$0.00
12/19/2019	Thu		KATK-FM 08:28:30 AM	1	\$0.00	\$0.00
12/20/2019	Fri	1:30	KATK-FM 08:50:30 AM	1	1 \$0.00	\$0.00
12/19/2019	Thu	1:30	KCDY-FM 08:52:01 AM	1	1 \$0.00	\$0.00
12/20/2019	Fri	1:30	KCDY-FM 09:02:31 AM	1	\$0.00	\$0.00
12/19/2019	Thu	1:30	La Raza-FM 08:36:15 AM	1	\$0.00	\$0.00
12/20/2019	Fri	1:30	La Raza-FM 08:36:15 AM	1	\$0.00	\$0.00
12/31/2019			Sales Tax:			\$0.00
			We appreciate your business!		0 77 -	0 700 00
				Quantity	8 Total	\$500.00
			Т	FOTAL SALES TAX		\$0.00

Total Due

\$500.00

1 A. 2.

MAIL SERVICE CENTER

Invoice

522 W. MERMOD CARLSBAD, NM 88220

Date	Invoice #
12/19/2019	1038221

Bill To	
WIPP/ BOBBY ST. JOHN	
PO BOX 2078 CARLSBAD, NM 88220	
CARESBAD, AM 00220	

Ship To		

Quantity 788 COF 788 FOI	Item Code	AC	12/19/2019				
788 COI	Item Code						
		Description			Price E	ach	Amount
788 INS 788 APP 788 ADI 788 ADI 788 ADI 788 APP	DEDING FO SERTING IN: PPLYING LABE DDRESSING AU DDRESSING RI PPLYING LABE RE IVELOPES ST	ETURN AD ETURN LAE CANDARD F ALES TAX	G MAILERS DRESSING MAILEF			0.28 0.05 0.06 0.12 0.20 0.12 0.50 7.6458%	220.64 39.40 47.28 94.56 157.60 94.56 394.00 0.00

1	Attachment 3
2	Public Participation Information Required for Part B Application
3	

Pre-Application Meeting in Santa Fe, New Mexico, January 23, 2020

2 Summary of Meeting

- Introductory comments were made by Martin Navarrete, DOE Carlsbad Field Office
- A presentation (attached) was given on the draft Ten-Year Renewal Application for
 the Waste Isolation Pilot Plant Hazardous Waste Facility Permit by Karen Day,
 Regulatory Environmental Services
- The Permittees reiterated that written comments regarding the draft Renewal
 Application would be accepted from the public through Monday, February 3, 2020
- Questions regarding the draft Renewal Application were solicited
- The list of attendees is attached
- Written comments from George Anastas were provided to the Permittees during the meeting (attached)

13

1

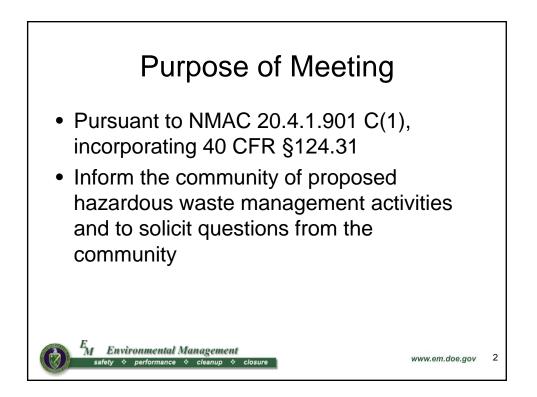
MEETING SIGN-IN SHEET				
Topic:	'Pre-Application Public Meeting	Meeting Date:	January 23, 2020	
Facilitator:	Department of Energy, Carlsbad Field Office and Nuclear Waste Partnership LLC	Place/Room:	100 Sandoval Street (Hilton), Santa Fe, NM	

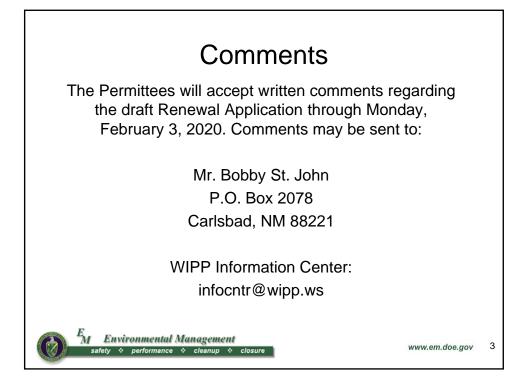
Name **Company/Organization** Le Anota Edile Riveks Scott Kovac S.LF AMERICAN SECURITY Nuclear Workh NM Don Hancock SRIC Asa Harduño CARD Debby Urquidez Ray Gardino concerned citizen CARD Ed Pathy Hughs NENMANN Star Zappe Ricardo MAESHAS SALF NMED Myan MeLean Kerin Pierard NMEN NMED US Senator Martin Heinrich Eric Castillo Leona Morgan NISG Susan Schunnan NISG Felina Roman Susan Roolriguez Karen Bonime NISG TSG ISG/CARD

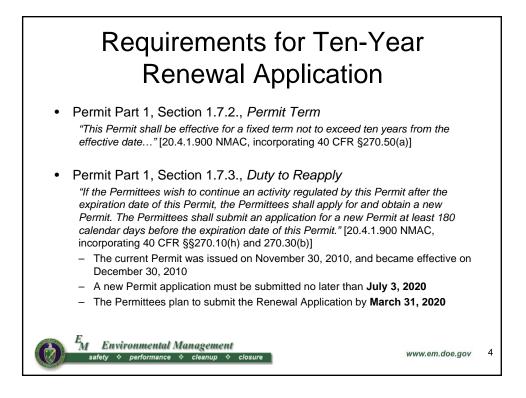
Name Company/Organization L. A. LOVEJOY. JR. law office Lara Sullivan UNM NA Cynthia Weehen Scott Wyland SF New Mexicen Self Office of Sen. Tom Volah intomes Reve Romo ROSE GARDNER AFES))uenne Od CARD choral Reade Arcentos AFES CCNS

Page 2 of 3

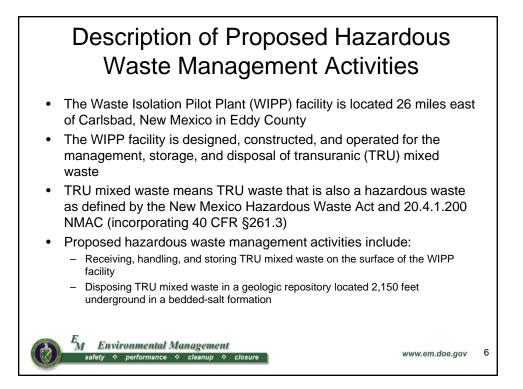


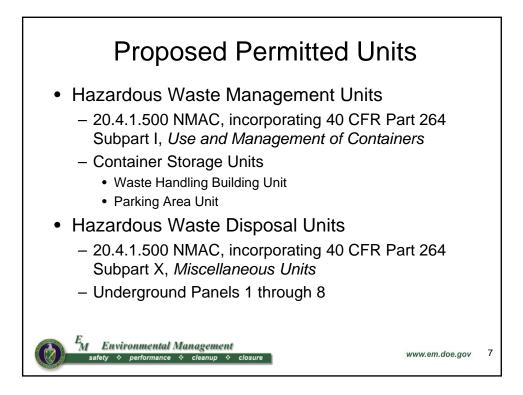




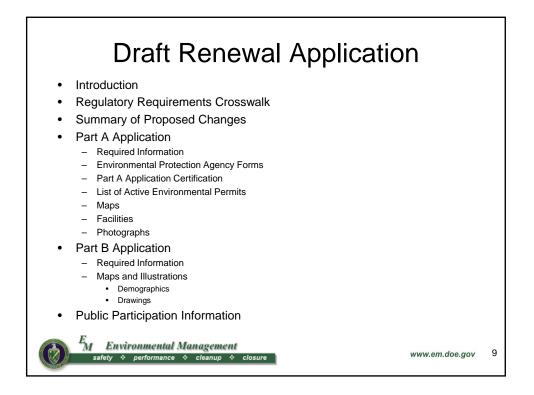


Renewal Application Scoping Meetings Public information meetings were held by the Permittees to present the planned scope of the Renewal Application - September 10, 2019, Carlsbad, New Mexico - September 12, 2019, Santa Fe, New Mexico Topics included: - Objective of Ten-Year Renewal Application Regulatory Overview Required Content of the Renewal Application Renewal Application Scope Renewal Application Timeline Permittees accepted written comments E M Environmental Management 5 www.em.doe.gov

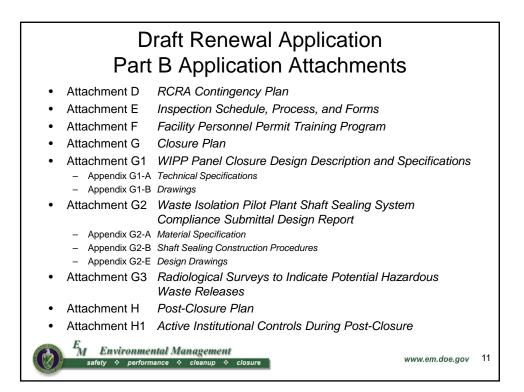




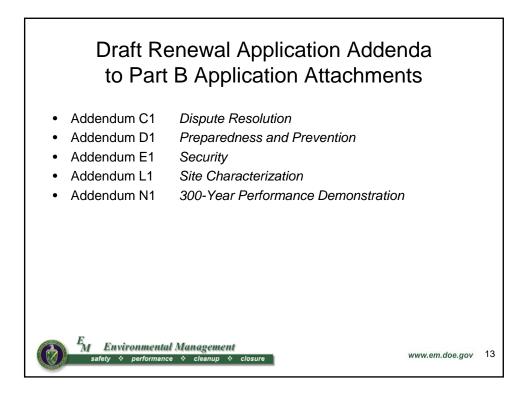


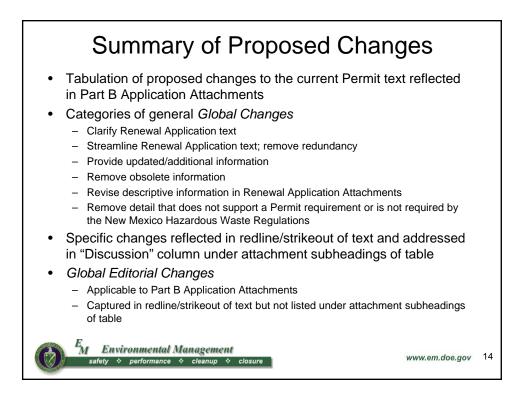


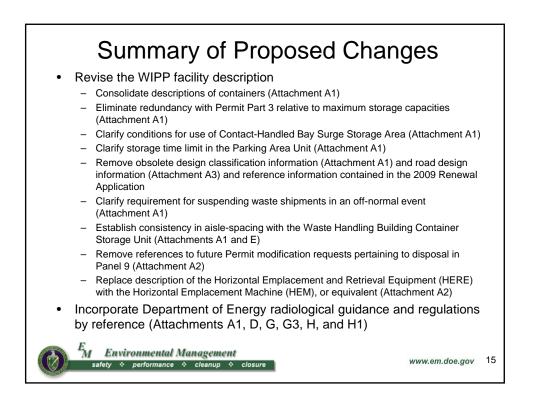


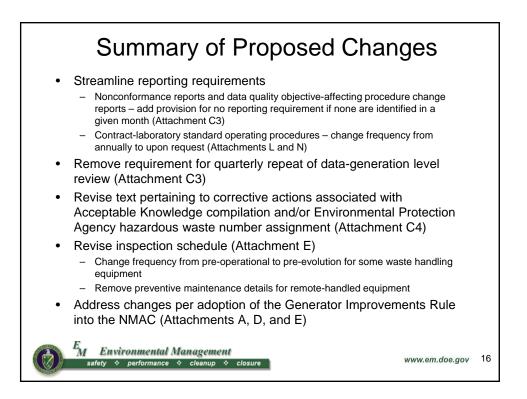


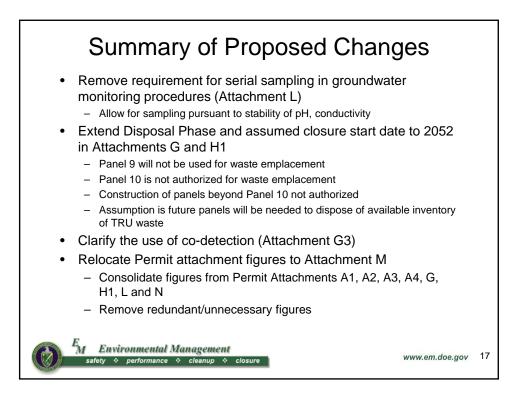


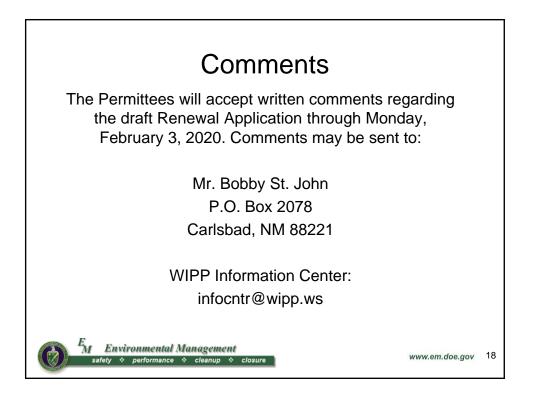












Statement by George Anastas, PE, CHP, BCEE, FHPS, FARPS January 23, 2019 Santa Fe Hilton Hotel, Santa Fe, New Mexico Regarding Waste Isolation Pilot Plant Draft Hazardous Waste Facility Permit Renewal Application March 2020

Good evening. I am a resident of New Mexico and I am unambiguously opposed to the issuance of a Renewal of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit without a State mandated termination of waste receipt at or before the year 2030. This opposition is based on the issues presented herein. It is time for New Mexico to say: "Enough is enough: New Mexicans are not enjoying the remnants of uranium mining strewn across the State including Native American Lands, all sorts of releases to the New Mexico water shed and groundwater from LANL as well as buried waste, buried waste at Sandia, and now DOE wants to continue to dump transuranic waste and hazardous waste at WIPP until 2052, or 24,000 years hence, the half-life of Plutonium-239, or in perpetuity. Enough is enough.

In reviewing the Draft Hazardous Waste Permit, I am struck by the many assertions contained in the Draft and related materials involving WIPP planning, promises by DOE in order to open WIPP and the actual facts. All these are evidence of continuing U.S. Department of Energy Mission Creep.

This Statement is organized as follows: first is the Department of Energy Assertion, then there are Facts relating to the Assertion and following the Facts are the Independent Assessments.

DOE Assertion 1: The operating life of the WIPP was stated by DOE, understood by Congress, understood by the State of New Mexico and understood by New Mexicans as 25 years.

Fact 1: WIPP received its first shipment of transuranic waste in 1999. Arithmetic indicates that the DOE should cease dumping waste in WIPP on or about the year 2024 if DOE desires to "keep its word".

Assessment 1: The State of New Mexico should require the end of waste dumping at WIPP to occur on or before the year 2030. DOE should ready plans for WIPP to cease accepting waste on or about the year 2030. The Waste Isolation Pilot Plant (Pilot???) should not operate until 2052 and certainly not in perpetuity.

Fact 1a: WIPP was not supposed to be the only transuranic waste dump in the United States.

Assessment 1a: DOE should use the next 10 years in convincing another locality to accept a transuranic waste dump.

Fact 1b: Every few years DOE updates the transuranic waste inventory at the generating sites, and the inventory keeps growing.

Assessment 1b: And now DOE wants New Mexicans to believe that WIPP should operate until at least the year 2052 or in perpetuity!! DOE wants New Mexicans to embrace its flawed assumptions including 17 shipments per week and 40 weeks of waste burial. There is no basis in fact for any of the DOE assumptions regarding waste inventory or shipments to WIPP, including the assumption of "a reasonable waste receipt rate" which is no more that wishful thinking to support continued, in perpetuity, waste dumping.

DOE Assertion 2: The Waste Isolation Pilot Plant (**WIPP**) facility is designed, constructed, and operated for the management, storage and disposal of transuranic (**TRU**) mixed waste. Both contact-handled (**CH**) and remote-handled (**RH**) TRU mixed wastes are permitted for storage and disposal at the WIPP facility. (Page 1 of Draft Permit Renewal)

Fact 2: DOE buried spent nuclear fuel from domestic and foreign reactors and high-level waste from UREX reactor fuel reprocessing all originating from Argonne National Laboratory. (Source: Argonne National Laboratory East, DOE and EPA)

Assessment 2: The Land Withdrawal Act prohibits the transport or disposal of spent nuclear fuel or high-level radioactive waste from reprocessing at WIPP. DOE promised New Mexicans that spent nuclear fuel and high-level waste would not be buried at WIPP.

I repeat the questions I have asked DOE and others several times and have been stonewalled each time: What quantity of spent nuclear fuel and UREX reprocessing waste has been buried at WIPP and will the DOE continue the practice of burying spent nuclear fuel and reprocessing waste at WIPP? Is the burial of spent nuclear fuel and high-level waste in WIPP the reason why DOE wants to keep the WIPP open until the year 2052, or in perpetuity?

Fact 2a: It is impossible to "dispose of" transuranic waste. Only time, many thousands of years, will reduce, not eliminate, radioactivity by radioactive decay. **Assessment 2a:** WIPP is an underground dump that DOE hopes will not be breached by the pressurized brine reservoirs postulated to be about 600 feet

beneath WIPP (DOE/WIPP-17-2308), additional exploding waste drums, additional underground fires or other man-made (hydro-fracking) or natural phenomena. There were over 157 oil wells, 12 gas wells and 12 salt water disposal wells within 1 mile of the WIPP Site in 2017 as shown in the following figure.

Fact 2b: The International Atomic Energy Agency (IAEA) has stated: "...the potential presence of oil/gas deposits, valuable minerals and of geothermal energy should be taken into account to minimize the potential for human intrusion into the geologic disposal system."(Reference: International Atomic Energy Agency, Siting of Geological Disposal Facilities, Safety Guide No. 11-G-4 1) Assessment 2b: Southeastern New Mexico is a hot-bed of oil and natural gas wells. The production of oil and natural gas around the WIPP site is not a "potential presence". In Fiscal Year 2019 New Mexico earned a record \$3.1 billion in oil and gas revenues. Some significant fraction of this \$3.1 billion resulted from hydrocarbon extraction from southeastern New Mexico, near the WIPP site. Contamination of these hydrocarbon resources by transuranic waste would have a significant impact on the New Mexico economic posture as well as a reduction in oil production in the United States. The drilling rates for the Delaware Basin have substantially increased from 46.8 to 93.4 deep boreholes per square kilometer (2017 data). The following figure shows nearly 175 oil/natural gas/salt water disposal wells were located around the WIPP in 2017, many of the wells were nestled right up against the WIPP boundary. I am confident that on January 23, 2020 there are many more oil and gas wells nearby WIPP, patently in conflict with the IAEA guidance and reasonable scientific sense. It is time to begin the process of closing WIPP.

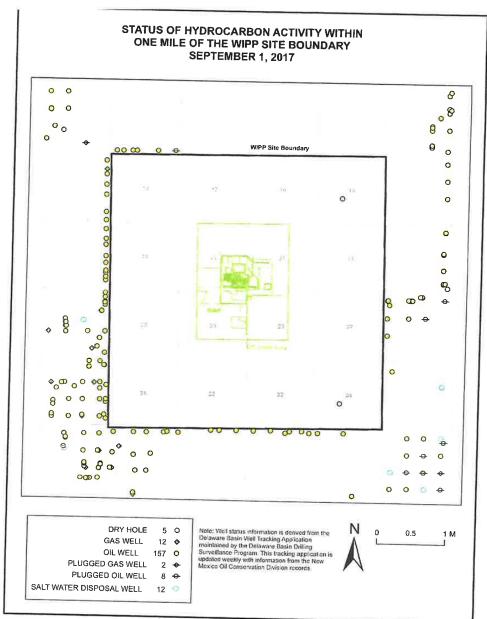


Figure 3: Oil and Gas Wells within One Mile of the WIPP Site

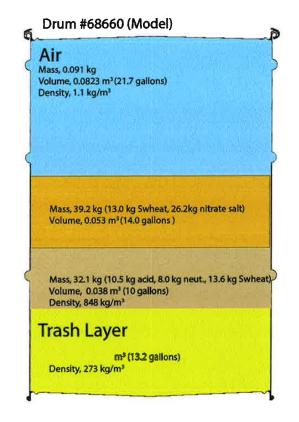
DOE/WIPP-17-2308

20

September 2017

Fact 2c: Much of the air within waste containers and waste overpacks dumped at WIPP contain hazardous waste subject to RCRA in the form of Volatile Organic

Compounds (VOCs). VOCs do not decay so they will be present for many years. Assessment 2c: DOE is creating a VOC underground storage site in New Mexico. Indeed, VOCs released from waste containers are present in the underground air and routinely/continuously released to the environment. VOCs would be massively released in the event of a WIPP breach. The following figure (Source: DOE) is a model of the LANL (Exploding) Drum 68660 showing that over 35% of the drum volume was air, most likely contaminated with VOCs.



DOE Assertion 3: The likelihood of a fire in the underground was estimated by DOE to be 1 in 10,000 years. (Source Final WIPP SEIS-II, 1997, Appendix G, Page G-69, Table G-7, Annual Frequencies of Occurrence for WIPP Disposal Accidents)

Fact 3: The preventable fire in the underground occurred February 5, 2014 and the probability of a fire in the underground is now demonstrated to be once in 15 years.

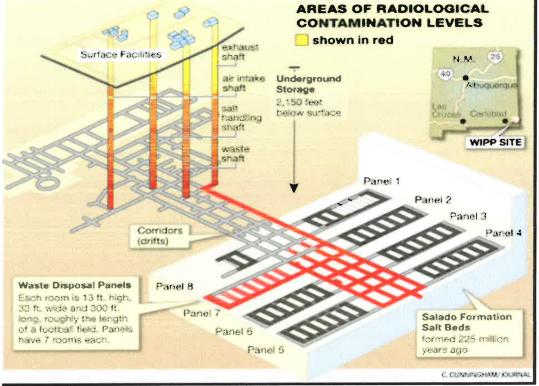
Assessment 3: DOE was alerted to flammable and exploding drums of transuranic waste numerous times (for example the seminal article which appeared in Nuclear Safety, Volume 33-2, April-June 1992, An Assessment of Flammability and

Explosion Potential of Defense Transuranic Waste, Matthew Silva) and a plethora of DOE and DOE contractor reports.

DOE Assertion 4: The likelihood of a waste drum detonating in the underground is zero, 0, it cannot occur. (Roger Nelson, Chief Science Officer, CBFO at 2002 WIPP Quarterly Meeting)

Fact 4: The preventable detonation of LANL Drum 68660 occurred in the underground on February 14, 2014.

Assessment 4: The detonation contaminated many thousands of square feet of rooms, drifts, exhaust shaft, filters and appurtenances with Plutonium-239 and Americium-241, leading to the abandonment of many rooms and drifts and costing taxpayers an incremental cost of \$3,000,000,000 (that is correct, 3 billion dollars or more).



DOE Assertion 5: DOE now claims in a classic bait and switch that the volume of waste is not the volume of the container in order to increase the volume of waste dumped at WIPP.

Fact 5: DOE and others have stated for more than 30 years that the volume of waste dumped at WIPP is the volume of the container.

Assessment 5: DOE now claims the volume of waste in a container and subsequently dumped at WIPP is the result of some mystical arithmetic estimate that is a fraction of the container volume. DOE wants New Mexico, the Public and the New Mexico Environment Department to ignore all the DOE statements and promises. DOE and others offer a blind eye that the headspace of waste drums contains hazardous waste, Volatile Organic Compounds, including carbon tetrachloride, chlorobenzene, methylene chloride, toluene and 1, 1, 1-trichloroethance. These VOCs are/should be subject to routine room-based VOC monitoring. The volume of waste (VOCs as a vapour in the head-space of the container, nitrates, chemical wastes, and liquid, Plutonium, Americium, etc.) is the volume of the container that contains the waste. And is consistent with Statements by Ines Triay, Manager, CBFO, 2002 at a get-together at her home and Roger Nelson, Chief Scientific Officer, CBFO, 2002 at a WIPP Quarterly Meeting both made to George Anastas.

Fact 5a: VOCs are integral to the solid (and yes, some liquid) waste in the waste containers.

Assessment 5a: There probably were VOCs associated with the spent nuclear fuel and UREX reprocessing waste originating from Argonne National Laboratory subsequently dumped at WIPP. And there are VOCs in the head-space of drums dumped at WIPP and released to the rooms, drifts and the environment.

Requiring DOE to cease receiving transuranic waste at WIPP on or before the year 2030 is not unreasonable based upon the DOE record including environmental and other documents, statements made by representatives of DOE, DOE promises made to the Public and New Mexicans and public policy.

My credentials include over 50 years of experience in nuclear, radiation and industrial safety in government, academia and private industry. Beginning in 1966 I interacted with the Regulatory staff and General Manager staff of the Atomic Energy Commission, the staff of the Energy Research and Development Administration and the staff of the Department of Energy. I have testified and presented before national, state and local agencies in New York, California and New Mexico, most recently before the New Mexico Environment Department, the Defense Nuclear Facilities Safety Board and the National Academies of Sciences Engineering and Medicine. I am a Professional Nuclear Engineer, a Certified Health Physicist, a Board-Certified Environmental Engineer (in Radiation Protection), a Fellow of the Health Physics Society and a Fellow of the Australasian Radiation Protection Society. I have been engaged in varying degrees with the WIPP since 2002, nearly 18 years.

Pre-Application Meeting in Carlsbad, New Mexico, January 30, 2020

2 Summary of Meeting

- Introductory comments were made by Martin Navarrete, DOE Carlsbad Field Office
 A presentation (attached) was given on the draft Ten-Year Renewal Application for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit by Karen Day, Regulatory Environmental Services
 The Permittees reiterated that written comments regarding the draft Renewal Application would be accepted from the public through Monday, February 3, 2020
- Questions regarding the draft Renewal Application were solicited
- The list of attendees is attached
- Written comments from Craig Stephens, Carlsbad Department of Development, were provided to the Permittees during the meeting (attached)

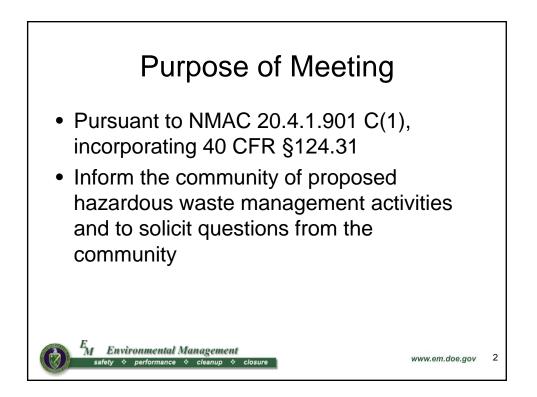
13

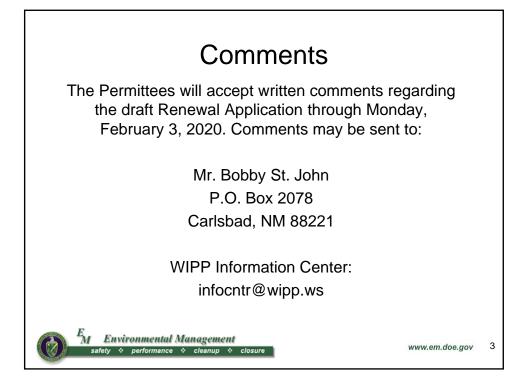
1

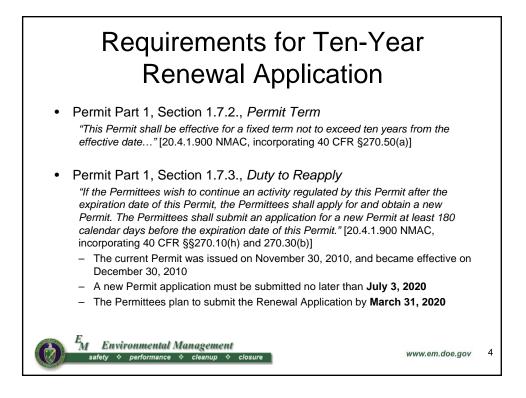
MEETING SIGN-IN SHEET				
Topic:	Pre-Application Public Meeting	Meeting Date:	January 30, 2020	
Facilitator:	Department of Energy, Carlsbad Field Office and Nuclear Waste Partnership LLC	Place/Room:	4021 National Parks Highway, Carlsbad, NM	

Company/Organization Name City of Carlsbud tyle Martsiena Department of Development Carlishad Vegident Lary Motchell Mark PEARCY Advin Hoden Current - Argus Amber Gellis NMED chamber Robert P. Defer JILL FARNSWORTH RES ale Schimen CARC Tracy Hughes Gard Grizze Senator Heinrichs of liane Venturs tice George Basabelize DACE JANNAN city of CARUSBAD EDWARD T. RODELGUET Corry of CARLERAN

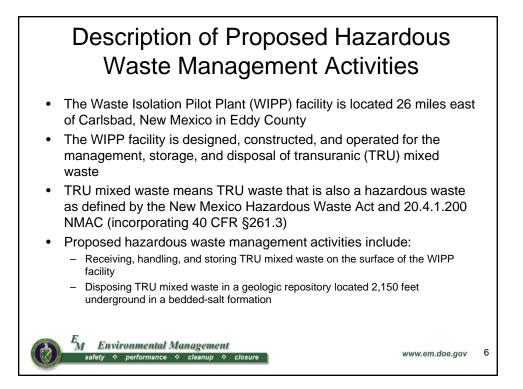


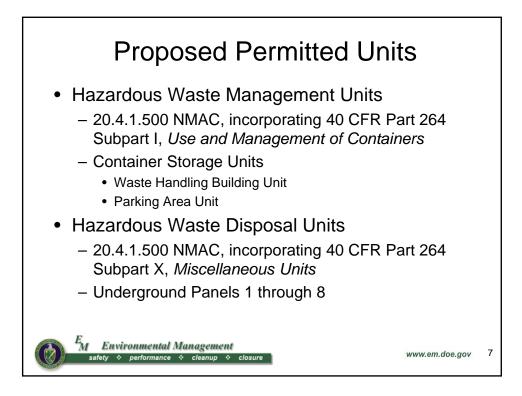




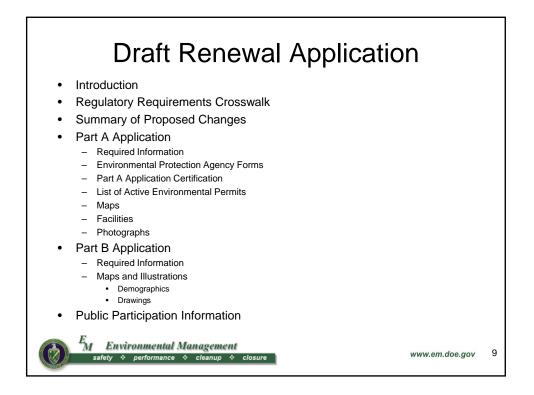


Renewal Application Scoping Meetings Public information meetings were held by the Permittees to present the planned scope of the Renewal Application - September 10, 2019, Carlsbad, New Mexico - September 12, 2019, Santa Fe, New Mexico Topics included: - Objective of Ten-Year Renewal Application Regulatory Overview Required Content of the Renewal Application Renewal Application Scope Renewal Application Timeline Permittees accepted written comments E M Environmental Management 5 www.em.doe.gov

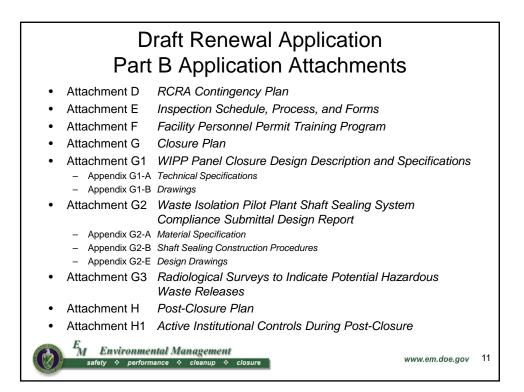




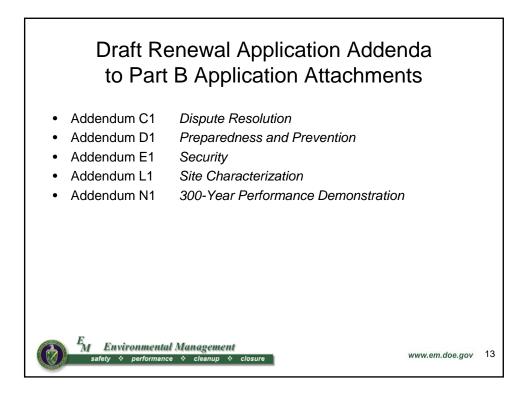


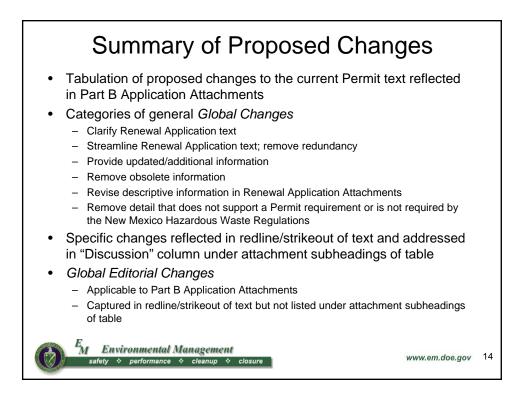


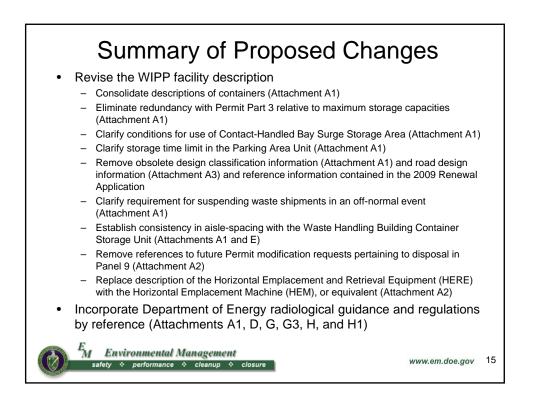


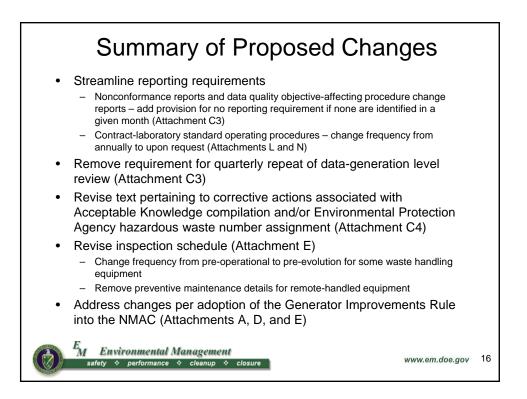


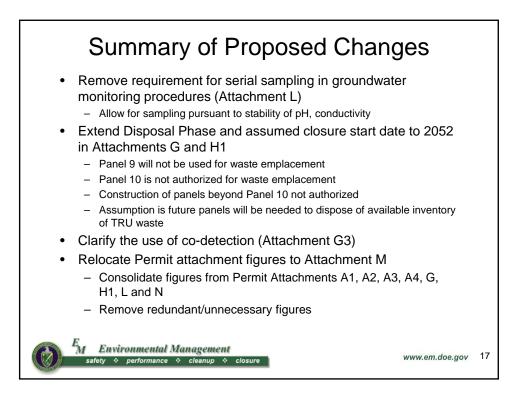


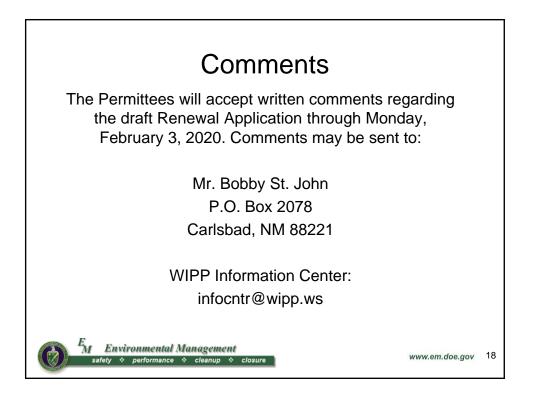














Jan. 30, 2020

To Whom It May Concern:

Please accept this letter in support of WIPP's Ten-Year Renewal draft application. The Carlsbad Department of Development appreciates the opportunity to participate in this pre-application process. CDOD board members are also regular participants at Carlsbad Mayor's Nuclear Task Force meetings, where we have received briefings about this application. We consider this draft application and its proposed revisions to be worthwhile and support their approval. The applications and its proposed revisions continue to advocate for the safety of the workforce and the community.

Notably, there are no changes proposed to the way waste is shipped, unloaded, and brought underground to the disposal units. In addition, there are no changes to the limits placed on defense TRU waste that is eligible for disposal at WIPP. And most importantly, there are no safety related or environmental hazard changes proposed.

It is our understanding that during your pre-application meeting in Santa Fe, several northern stakeholders voiced their concern about a proposed adjustment to WIPP's anticipated closure date. Our community knows that this date was always arbitrary. As you know, there is TRU waste being generated right now that should go to WIPP, and it makes the most sense to continue to put a proven facility, which has been modernized and has a highly-trained workforce, to good use. I assume those of you that live near the generators in northern New Mexico would certainly agree with this logic rather than allowing TRU waste to be stockpiled.

WIPP continues to responsibly serve as a permanent solution to the nation's TRU waste created by our defense programs. It would be foolish to set an arbitrary date limit before all of the waste has been eliminated.

Sincerely

Craig Stephens President, Board of Directors Carlsbad Department of Development

> 400-2 Cascades Avenue, Suite 201 • P.O. Box 1090 • Carlsbad, NM 88220 800-658-2709 • 575-887-6562 • Fax 575-885-0818 www.developcarlsbad.org

1	Attachment 4
2	Written Comments Received by the Permittees after Pre-Application Meetings by
3	February 20, 2020
4	

From:	Chavez, Rick - RES
To:	<u>Day, Karen - RES; Cook, Dennis - NWP</u>
Subject:	FW: [EXTERNAL] Need extension to make comments on pre-submittal HWFP application
Date:	Tuesday, February 04, 2020 8:30:51 AM

-----Original Message-----From: Joni Arends <jarends@nuclearactive.org> Sent: Sunday, February 02, 2020 2:39 PM To: Chavez, Rick - RES <Rick.Chavez@wipp.ws>; St John, Bobby - NWP <Bobby.StJohn@wipp.ws>; Lachman, Kirk - FedNet <kirk.lachman@cbfo.doe.gov>; Rene_Romo@tomudall.senate.gov; McLean, Megan, NMENV <Megan.McLean@state.nm.us>; INFOCNTR <infocenter@wipp.ws>; Maestas, Ricardo - State of NM <ricardo.maestas@state.nm.us> Subject: [EXTERNAL] Need extension to make comments on pre-submittal HWFP application

WARNING - EXTERNAL EMAIL

This message does not originate from a known WIPP email system. Use caution if this message contains attachments, links or requests for information.

Good afternoon,

Despite assurances to all those in attendance at the public meeting in Santa Fe on Jan. 23, 2020, DOE/NWP has not provided the direct links to the pre-submittal HWFP application on the WIPP home page. The public is required to dig for it on the website. One person found the 2009 application and asked CCNS whether that was the application to provide comments.

I described spent 20 to 30 minutes looking for the pre-submittal application on the website, with no success. I called Don Hancock who walked me through the process to find that application. If I had trouble finding it on the WIPP website, others would inevitably have trouble locating the pre-submittal renewal application.

CCNS made a simple request at the Jan. 23, 2020 ublic meeting to ensure easy access to the pre-submittal application for the public. We were assured twice that it would be taken care of. It was not. CCNS, therefore, requests a 30-day extension to provide public comments on the December 2019 ten-year renewal application (pre-submittal).

Sincerely,

--

Joni Arends, Executive Director Concerned Citizens for Nuclear Safety P. O. Box 31147 Santa Fe, NM 87594-1147 505 986-1973 www.nuclearactive.org

From:	<u>St John, Bobby - NWP</u>
To:	<u>Chavez, Rick - RES; Brown, Michael (Mike) - FedNet; Day, Karen - RES</u>
Subject:	FW: [EXTERNAL] Re: Requesting extension on pre-submittal HWFP application
Date:	Tuesday, February 04, 2020 6:17:23 AM

Please see the email below.

From: Deborah Reade <reade@nets.com> Date: Monday, February 3, 2020 at 4:51 PM To: "St John, Bobby - NWP" <Bobby.StJohn@wipp.ws>, INFOCNTR <infocenter@wipp.ws> Cc: "Chavez, Rick - RES" <Rick.Chavez@wipp.ws>, "Lachman, Kirk - FedNet" <kirk.lachman@cbfo.doe.gov>, "Rene_Romo@tomudall.senate.gov" <rene_romo@tomudall.senate.gov>, "McLean, Megan, NMENV" <Megan.McLean@state.nm.us>, "Maestas, Ricardo - State of NM" <ricardo.maestas@state.nm.us>

Subject: [EXTERNAL] Re: Requesting extension on pre-submittal HWFP application

Dear Mr St. James,

I am requesting a 90 day extension for comments on the pre-submittla HWFP application. There are multiple problems that have continued throughout this process that have made it impossible for most members of the public to inform themselves about this application and to be able to comment correctly on it. I was present for much of the recent information meeting in Santa Fe and it was clear that many members of the public were confused then. Certain improvements were supposed to be made to the website—far too late in the process of course, but better late than never. However, when I went to the website, it didn't appear that these corrections and improvements had been made, even now.

1. Perhaps the major problem that I found was that **the permit renewal application** that is on the website renewal application information page ,and evidently has been on this website page throughout the entire comment period, **is for the September 2009 renewal.** There is no December 2019 renewal application on the website page. I didn't go through all the attachments to see if they were the correct ones because if the application is wrong, what's the point? Perhaps you added the correct application into some obscure part of the website, but even if so, it's too late and not enough. To have the wrong application on the primary page should void the entire process.

2. realized that the application was 10 years out of date, after looking at the **human exposure information** required by the regulations in that application. It stated that nothing had changed since

the original exposure study had been done. I certainly hope this has been properly updated since 2009. Since WIPP has experienced a radioactive and hazardous/toxic release that has already increased human exposure within approximately 150 miles of the site and since several proposed and permitted modifications have increased potential exposures near the site and during the transportation phase of the project, I knew this couldn't be a correct exposure study. (As was described in a previous SEIS, most of the negative health effects from the entire WIPP project occur during the transportation phase and most occur at the rest stops where people working there can receive many times the lifetime dose of a nuclear worker.) That's when I realized I was reviewing the wrong document.

3. I also have not seen anything at all written for the Spanish speaking public even though within 30 miles of WIPP almost half of the population is Hispanic and 25% of the population speaks Spanish in the home. In fact, within 50 miles of WIPP (well within the range of the WIPP release from the underground drum explosion) 55% of the population is made up of minority residents—most of whom are Hispanic--and 35% of the population speaks a language other than English in the home. Since I was not able to read what might have been in the current application, I can't tell if NMED addressed this high percentage of People of Color potentially affected by the site and its transportation, but the lack of materials reaching out to Spanish speakers does not bode well for a proper analysis of the demographics around WIPP. Have you addressed the extremely high cancer death rate in the area—a rate not to be seen anywhere else in the state? Or the extremely low life expectancies in the area surrounding WIPP?

In fact, though I wasn't able to go through the entire site, **it doesn't appear that there is a single word of Spanish in it.** This alone is also grounds to start again, correct the process and extend the comment period.

4. Normally a 60 day comment period would be enough even though the materials are extremely long and dense with information. However, because of the confusion generated by having the wrong information up online for the public, an extra 30 days is necessary. The public does not consist only of technically skilled and experienced people even though these might be most of the people you deal with. The public also includes people with maybe just a high school diploma (quite common in the rural areas of New Mexico) and contains a high percentage of people who may need information in Spanish to be fully informed. In fact, to avoid discrimination, Low English Proficiency (LEP) Spanish speakers must have access to the same vital information that English speakers have. This has so far not been the case in this process. (This does not mean that the entire application etc. must be translated in full; a translated summary, if it includes all the vital information and is a correct summary, is sufficient.)

So, I ask that you correct these mistakes and try to make the website a little more user friendly at the same time. It is not at all user friendly now for the average person and completely impossible for an LEP Spanish speaker to use. You then need to explain prominently on the website and in written materials that mistakes were made and what they were, before launching the new, extended comment period. Before the comment period starts, the corrections to the website need to be made, materials need to be provided in Spanish and hard copy of all the information in Spanish and English need to be provided in several places within 50 miles of WIPP—places that are open after

5pm during the week and on weekends. Only then will the general public have enough information to participate fully and equally in this process.

Sincerely, Deborah Reade

Deborah Reade 117 Duran Street Santa Fe NM 87501-1817 Phone/fax 505-986-9284 Reade@nets.com

From:	<u>St John, Bobby - NWP</u>
То:	Chavez, Rick - RES; Brown, Michael (Mike) - FedNet; Day, Karen - RES
Subject:	FW: [EXTERNAL] Re: Requesting extension on pre-submittal HWFP application
Date:	Tuesday, February 04, 2020 6:17:57 AM

This is a follow-up email to the previous one.

From: Deborah Reade <reade@nets.com> Date: Monday, February 3, 2020 at 6:26 PM To: "St John, Bobby - NWP" <Bobby.StJohn@wipp.ws>, INFOCNTR <infocenter@wipp.ws> Cc: "Chavez, Rick - RES" <Rick.Chavez@wipp.ws>, "Lachman, Kirk - FedNet" <kirk.lachman@cbfo.doe.gov>, "Rene_Romo@tomudall.senate.gov" <rene_romo@tomudall.senate.gov>, "McLean, Megan, NMENV" <Megan.McLean@state.nm.us>, "Maestas, Ricardo - State of NM" <ricardo.maestas@state.nm.us>

Subject: [EXTERNAL] Re: Requesting extension on pre-submittal HWFP application

Hello again,

I thought I should include the website address for the page I referred to in my previous email where I complained that the wrong application was included on the WIPP RCRA permit renewal page: <u>https://wipp.energy.gov/information-repository-index.asp</u>

This is where you end up if you you go from **Documents** to **RCRA** to the I**nformation Repository.** At first you think you're in the right place because at the top is the WIPP Searchable Permit for 1/24/2020. However, the searchable application is from 2009.

Sincerely, Deborah Reade

Deborah Reade 117 Duran Street Santa Fe NM 87501-1817 Phone/fax 505-986-9284 Reade@nets.com



Concerned Citizens for Nuclear Safety P.O. Box 31147 Santa Fe, New Mexico 87594-1147 505.986.1973 www.nuclearactive.org

February 20, 2020

By email to: Ricardo Maestas@state.nm.us

Mr. Ricardo Maestas, WIPP Program Manager New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

and

By email to: infocntr@wipp.ws

Mr. Bobby St. John P. O. Box 2078 Carlsbad, NM 88221

Re: Public Comments about the December 2019 draft Renewal Application for the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit

Dear Mr. Maestas and Mr. St. John:

Concerned Citizens for Nuclear Safety (CCNS) provides the following general and specific public comments about the December 2019 draft Renewal Application for the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit.

Since the 1970s when the Waste Isolation **Pilot** Plant (WIPP) was proposed, there have been concerns that the "pilot" could be expanded to be much more. Promises were made early on that the project would never be expanded, to calm those concerns. Yet here we are, at that point, today.

As required by the New Mexico Environment Department (NMED) hazardous waste permit, WIPP is scheduled to stop receiving waste and begin closing the facility in 2024. But the Department of Energy (DOE) wants NMED to renew that permit to allow the site to receive much more mixed hazardous, toxic, and transuranic (TRU – plutonium-contaminated) radioactive waste until 2052, or 2080, or ... essentially forever.

CCNS is a 501(c)(3) nonprofit organization and your donation is tax deductible to the extent of the law.

The current permit expires on December 30, 2020. NMED must renew the Permit so that New Mexico can regulate WIPP, but NMED does not have to approve the "Forever WIPP" dates.

DOE's expansion plans include the mining of a proposed (fifth) shaft into the WIPP underground -2,150 feet below ground surface. DOE has submitted a permit modification request and - without NMED acting on it – has awarded a \$75 million contract to begin shaft construction before NMED and public review as required by the hazardous waste laws and regulations.

On January 16, 2020, DOE submitted a request for a temporary authorization to begin work on the proposed shaft. NMED should deny the temporary authorization request for the reasons detailed in the January 27, 2020 comments of Southwest Research and Information Center in a letter to Stephanie Stringer, NMED.

DOE has other plans to expand WIPP for high-level radioactive waste from Hanford, Washington and other sites (again violating the 1992 Land Withdrawal Act that prohibits highlevel radioactive waste disposal at WIPP); commercial waste from West Valley, New York; weapons-grade plutonium from the Savannah River Site in South Carolina; and 50 years or more of waste from building new nuclear weapons among other things. DOE is also planning to create a surface storage facility to be able to process all this waste.

Yet it was known even before WIPP was built that the project, as "sold" to New Mexicans, could not hold all the transuranic waste in the inventory at that time, let alone future TRU-waste and other kinds of radioactive waste. DOE was supposed to find additional waste sites for all this waste. It has not done its job. Instead, DOE proposes an expansion of WIPP that violates the legal requirements of the Land Withdrawal Act and of the Resource Conservation and Recovery Act (RCRA). Further, DOE is using a "Volume of Record" (VOR) permit modification to increase the amount of waste allowed for disposal by about 30 percent.

1. AMBIGUOUS LANGUAGE. We are concerned about the ambiguous language in the draft renewal application to describe suggested changes, such as:

"Simplifying and streamlining Permit text to remove redundancy and inconsistencies, thereby enhancing its readability." P. 2, lines 17 - 18.

"Clarification of Permit text to improve its comprehensibility, thereby enhancing its readability." P. 2, lines 19 - 20.

For example:

We object to the removal of "[p]ortions of the original Part B Permit Application and 2009 Amended Renewal Application that were incorporated into the Permit by reference." Regulatory Requirements Crosswalk, p. 2, lines 26 - 27. NMED should not accept these removals from the administrative record for the draft renewal application. For facilities with a long-term operating record (25 years in this case), it is essential that **all** documents are included in the administrative record. In too many cases in recent times, Permittees and NMED have attempted to limit the documents in the administrative record to the detriment of the public. The burden must not be

Concerned Citizens for Nuclear Safety * Comments about the draft Renewal Application * February 20, 2020 * Page

put on the public to return these removed documents to the administrative record. Instead, the burden must be on NMED to prove that any documents are insignificant enough to be removed. NMED must document such removal(s) by preparing a document that is included in the administrative record prior to the release of the public notice that a draft permit is available for public review and comment.

We object to the fact that "[p]ending and future permit modification notifications or requests; approved modifications will be incorporated into the draft and final permit by the NMED." Id., 2, lines 31 – 32. We object that the temporary authorization request and the permit modification request for a proposed fifth shaft are not included in the draft renewal application. This not the first example of the Permittees attempting to "segment" their proposals in order to confuse and change the permit. We cite the August 2019 *DOE Carlsbad Field Office Strategic Plan 2019-2024*, DOE/CBFO-19-3605, Rev. 0, Final Draft for Stakeholder Input, as an example of the Permittees' attempts to confuse the true plans to expand the WIPP facility and waste disposal types in a segmented manner. Another example is the fifth shaft: is it a ventilation shaft? Is it an air intake shaft? Is it a shaft for a new waste hoist? Or is it something else? The Permittees have changed the shaft's name several times; thus, confusing the public, regulators, and others.

2. EXPOSURE INFORMATION. Despite several requests for the NMED Secretary to request additional information from the Permittees in order to establish permit conditions, specifically "exposure information" as required by 40 CFR § 270.10 (k), it remains unclear whether the request has been made. Since the permit was renewed in 2010, there have been two off-normal releases from the WIPP facility in February 2014. The Secretary must request additional information in order to establish permit conditions regarding these off-normal releases. See also, 40 CFR § 270.23(c) – Specific Part B information requirements for miscellaneous units.¹ The previous VOR modification also had none of this required information despite increasing both waste disposal volume and waste transportation by about 30%. This previous allowed expansion of WIPP must also be included in human exposure calculations for this permit renewal.

Though there is some information in the permit about the need to gather human exposure information, this information should be in the application when it is submitted—not gathered after the permit is issued or denied. Without this information, the application is incomplete. Plans to gather human exposure information also seem limited to the facility itself whereas information from previous WIPP Supplemental Environmental Impact Statement (SEIS II) reports makes it clear that almost *all* of the negative health effects from the entire WIPP project during normal operations, take place during the transportation phase of the project. According to the SEIS II, people who work at rest stops where WIPP trucks are parked and fueled can receive many times the dose allowed for a nuclear worker over their working lifetime. To protect New Mexicans who live or work along the transportation routes, this information must be gathered and made available *in the application* so the Secretary can create needed permit conditions to address these significant exposures.

¹ 40 CFR 270.23(c) "Information on the potential pathways of exposure of humans or environmental receptors to hazardous waste or hazardous constituents and on the potential magnitude and nature of such exposures."

We object to the fact that the Secretary has not requested any additional information in order to establish permit conditions that would take into consideration the needs, concerns, history and demographics of communities potentially affected by WIPP. The multiplicity of pollution sources and current poor health and low life expectancy of the affected population has not been considered in the renewal process for this permit. No form of mitigation has been considered despite proposals to expand WIPP in this renewal and despite a current cancer death rate in the area that is already the highest in the state—a rate that exists *only* in southeastern and south central New Mexico and nowhere else.

3. LACK OF COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964. We object that NMED and DOE are not complying fully with RCRA, specifically with

"20.4.1.1100 NMAC - COMPLIANCE WITH OTHER REGULATIONS: Compliance with this Part does not relieve a person of the obligation to comply with all other applicable state and federal regulations."

Title VI of the Civil Rights Act of 1964 is an applicable law, yet despite NMED signing a resolution agreement with the Environmental Protection Agency (EPA) on discrimination issues in 2017, NMED and DOE seem unclear about how to comply fully with their obligations. https://www.env.nm.gov/general/epa-and-nmed-informal-resolution-agreement-no-09r-02-r6-public-participation-limited-english-proficiency-and-non-employee-disability-policies/ DOE has stated that they are not required to provide equal access to information for Limited English Proficiency (LEP) Spanish speakers and are only providing a few public notices in Spanish as a courtesy. This either shows an intentional desire to discriminate or a sad lack of understanding of the law.

Providing equal access to information in Spanish in a state where many people are not fluent in English is not a courtesy; it is the law. The Civil Rights Act requires that every RCRA permit and RCRA permitting process in this state must not be discriminatory. The State Supreme Court has ruled that "social concerns" (including environmental justice concerns) must be included and considered in the RCRA process. But beyond that, because of the Civil Rights Act, and the various state and federal executive orders, every state and federal process in this country must not be discriminatory. DOE's public process for the WIPP renewal application clearly is discriminatory, as they have provided almost no information in Spanish about this complex renewal.

DOE has translated a few public notices, but they have not been widely distributed and are almost impossible to find on their otherwise English-only website. Even if LEP Spanish speakers are able to find the Spanish public notices, they still will not have much idea of what the renewal is about, as a few sentences in the public notice—in any language—are not sufficient to describe this complex permit renewal. *LEP Spanish speakers must have access to the same vital information that is available to English speakers. Anything less is discriminatory.* This does not mean that the entire permit and vital documents must be translated, but an accurate and complete translated summary of this vital information is required. We would be pleased to work with DOE and NMED to ensure compliance.

4. REINSTATE THE ENVIRONMENTAL EVALUATION GROUP (EEG). We object to the fact that the Secretary has not established any permit conditions, including a safety oversight group, to deal with the many safety problems at WIPP and its generator sites, specifically the Los Alamos National Laboratory (LANL) generator site which is one of the primary generator sites envisioned in this permit for future TRU-waste disposed in WIPP. Both WIPP and LANL have had and continue to have serious safety problems—the situation is similar to that which existed previous to the WIPP underground explosion and release. Both LANL and WIPP management officials have arrogantly stated, "Safety is a journey." This renewal application does not take this low level of safety into consideration. *Before even thinking about expansion, LANL and WIPP should be at their safety "destination," not somewhere on the road.*

DOE got rid of the previous state oversight group, the Environmental Evaluation Group (EEG), because they claimed they did not need any more safety oversight. It was after their removal that the explosion and release occurred. This would never have happened if the EEG had been involved as they would have pointed out the total safety incompetence that was going on at LANL and it would have been caught early on. A new "EEG," paid for by DOE, but under state control, needs to be part of this renewal whether or not an expansion in time or waste remains part of the permit. DOE is incapable of maintaining a safe working environment without supervision as has been demonstrated over and over again in the past. The fact that DOE's reaction to safety issues found at LANL by their own oversight group (the Defense Nuclear Facilities Safety Board) is to limit access and try to get rid of that group (just as they got rid of the EEG) underlines the need for New Mexico, the Governor, the Environment Department, and other appropriate agencies, to step in with its own oversight.

5. SPECIFIC COMMENTS. We request that the Permittees submit a 100-year floodplain map for the WIPP site. Given changes due to climate change and increased fracking and oil and gas exploration, it is important for the Permittees to update its 100-year floodplain map in their renewal application. 40 CFR §270.14(b)(19)(ii).

We have concerns about Attachment O *WIPP Mine Ventilation Rate Monitoring Plan* regarding equipment calibration and maintenance. Please ensure that the most current information about calibration and the manufacturer equipment specifications are available in the renewal application.

We are concerned about the proposed removal of language in:

A.

Section A1-1b Description of Containers about surface and external contamination;

Β.

Section Al-lc(1) *Waste Handling Building Container Storage Unit* that "secondary containment is provided by the concrete floors themselves, not the coating on the floors; however, the coating must be compatible with TRU mixed waste, which renders the coating impervious to any chemicals present in the waste." Secondary containment is an issue that was discussed in detail during the 2010 permit renewal process. Are the Permittees are suggesting that the coating is not secondary containment

and they are not required to maintain the floor coating according to manufacture specifications? Section A1-1c(1) Waste Handling Building Container Storage Building C. Container Storage Unit; CH Bay Surge Storage Area. We are concerned about plans to store CH and/or RH packages in their shipping containers in the CH Bay Surge Storage Area. Section A1-1c(1) Waste Handling Building Container Storage Unit. The D length of 60 inches between the wall of the CH Bay and the facility pallets was put into the permit in order to account for the length of the tongs on the forklifts. The condition was inserted into order to prevent forklift tongs from going through the metal walls of the CH Bay. The condition should not be changed. Section A1-1d(4) Handling Waste in Shielded Containers. Any changes to E. radiation protection standards by DOE [10 CFR Part 835 Occupational Radiation Protection] should be noticed to the public through a Class 1 permit modification request. Section A1-1e(1) WHB Unit and Section A1-1e(2) Parking Area Unit. F. We are concerned about the proposed deleted sentences and paragraphs in each section. Attachment C4, Section C4-3g Audits of Acceptable Knowledge. A CAR G. must be issued should the necessary AK information has not been compiled during an audit. Section E-1 Inspection Schedule; Section E-1a General Inspection H. Requirements; and Section E-1a(2) Frequency of Inspections. We are concerned about the proposed deleted language in this section.

As New Mexicans, CCNS demands that NMED enforce the legal requirements in the Resource Conservation and Recovery Act, as implemented by the New Mexico Hazardous Waste Act, as well as the January 19, 2017 Informal Resolution Agreement between NMED and the U.S. Environmental Protection Agency. We respectfully request that NMED deny DOE's proposals for waste disposal for decades more and deny the proposed expansions.

Sincerely,

Jori Arends, Co-founder and Executive Director Concerned Citizens for Nuclear Safety P. O. Box 31147 Santa Fe, NM 87594-1147 jarends@nuclearactive.org

Attachment 5 Written Comments Received by the NMED after Pre-Application Meetings by February 20, 2020

From:	Maestas, Ricardo, NMENV
То:	St John, Bobby - NWP; Chavez, Rick - RES; Day, Karen - RES; Brown, Michael (Mike) - FedNet; Navarrete, Martin -
	FedNet
Cc:	McLean, Megan, NMENV; Biswell, David - NMED
Subject:	[EXTERNAL] FW: [EXT] Please do not expand WIPP
Date:	Friday, February 21, 2020 7:53:26 AM

WARNING - EXTERNAL EMAIL

From: Jean Siegfried Darling <jdarling@sandwich.net>
Sent: Friday, February 14, 2020 9:12 AM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Subject: [EXT] Please do not expand WIPP

Ricardo Maestas, WIPP Program Manager By email to: <u>Ricardo.Maestas@state.nm.us</u> New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

February 14, 2020

Re: Request for NMED to Use Its Authority to:

- Not change the 2024 date to stop waste disposal in the WIPP Permit
- Not allow the proposed new shaft and other facility expansions
- Enforce the legal limits for the amount and types of waste, including eliminating the "Volume of Record" from the WIPP Permit

Dear Mr. Maestas:

Since the 1970s when the Waste Isolation **Pilot** Plant (WIPP) was proposed, there have been concerns that the "pilot" could be expanded to be much more. We are at that point.

As required by the New Mexico Environment Department (NMED) hazardous waste permit, WIPP is scheduled to stop receiving waste and begin closing the facility in 2024. But the Department of Energy (DOE) wants NMED to renew that permit to allow the site to receive much more mixed chemical and transuranic (TRU – plutonium-contaminated) radioactive waste until 2052, or 2080, or ... essentially forever.

NMED must renew the Permit so that New Mexico can regulate WIPP, but NMED does not have to approve the "Forever WIPP" dates.

DOE's expansion plans include the mining of a new (fifth) shaft into the WIPP underground - 2,150

acting on it – has awarded a \$75 million contract to begin shaft construction before NMED and public review as required by the hazardous waste laws and regulations.

DOE also has other plans to expand WIPP for high-level radioactive waste from Hanford, Washington and other sites; commercial waste from West Valley, New York; weapons-grade plutonium from the Savannah River Site in South Carolina; 50 years or more of waste from building new nuclear weapons; and even to create a surface storage facility.

DOE is supposed to find additional waste sites for this waste. It has not done its job. DOE proposes expansion of WIPP that violates the legal requirements and is using a "Volume of Record" to increase the amount of waste allowed for disposal by about 30 percent.

As a New Mexican, I demand that NMED enforce the legal requirements and not approve DOE's wishes for waste disposal for decades more and not allow the proposed expansions.

Sincerely,

Rev. Jean Siegfried Darling, ret.
Minister Emerita, Peoples Church of Chicago
Co-chair, Santa Fe Unitarian Universalist Congregation Environmental Justice Team
64 Vista del Oro, Cerrillos, NM 87010
312-405-9470

cc: Governor Michelle Lujan Grisham, James C. Kenney, Secretary, NM Environment Department

Rev. Jean Siegfried Darling 312.405.9470 (cell)
Minister Emerita, Peoples Church of Chicago Co-Chair, UU Santa Fe Environmental Justice Team Cerrillos, NM 87010 February _14____, 2020

Ricardo Maestas, WIPP Program Manager By email to: <u>Ricardo.Maestas@state.nm.us</u> New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

Re: Request for NMED to Use Its Authority to:

- Not change the 2024 date to stop waste disposal in the WIPP Permit
- Not allow the proposed new shaft and other facility expansions
- Enforce the legal limits for the amount and types of waste, including eliminating the "Volume of Record" from the WIPP Permit

Dear Mr. Maestas:

Since the 1970s when the Waste Isolation **Pilot** Plant (WIPP) was proposed, there have been concerns that the "pilot" could be expanded to be much more. We are at that point.

As required by the New Mexico Environment Department (NMED) hazardous waste permit, WIPP is scheduled to stop receiving waste and begin closing the facility in 2024. But the Department of Energy (DOE) wants NMED to renew that permit to allow the site to receive much more mixed chemical and transuranic (TRU – plutonium-contaminated) radioactive waste until 2052, or 2080, or ... essentially forever.

NMED must renew the Permit so that New Mexico can regulate WIPP, but NMED does not have to approve the "Forever WIPP" dates.

DOE's expansion plans include the mining of a new (fifth) shaft into the WIPP underground – 2,150 feet below ground surface. DOE has submitted a permit modification request and - without NMED acting on it – has awarded a \$75 million contract to begin shaft construction before NMED and public review as required by the hazardous waste laws and regulations.

DOE also has other plans to expand WIPP for high-level radioactive waste from Hanford, Washington and other sites; commercial waste from West Valley, New York; weapons-grade plutonium from the Savannah River Site in South Carolina; 50 years or more of waste from building new nuclear weapons; and even to create a surface storage facility.

DOE is supposed to find additional waste sites for this waste. It has not done its job. DOE proposes expansion of WIPP that violates the legal requirements and is using a "Volume of Record" to increase the amount of waste allowed for disposal by about 30 percent.

As a New Mexican, I demand that NMED enforce the legal requirements and not approve DOE's wishes for waste disposal for decades more and not allow the proposed expansions.

Sincerely, Clearly print your name: Jean Stevens_

Contact information: jeanstevens@hotmail.com

From: To:	<u>Maestas, Ricardo, NMENV</u> St.John, Bobby - NWP; Chavez, Rick - RES; Day, Karen - RES; Brown, Michael (Mike) - FedNet; Navarrete, Martin
10.	- FedNet
Cc:	McLean, Megan, NMENV; Biswell, David - NMED
Subject:	[EXTERNAL] FW: [EXT] WIPP Permit
Date:	Friday, February 21, 2020 7:55:09 AM

WARNING - EXTERNAL EMAIL

From: Basia Miller <basia.miller5@gmail.com>
Sent: Saturday, February 15, 2020 9:33 AM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Subject: [EXT] WIPP Permit

February 15, 2020 Ricardo Maestas, WIPP Program Manager By email to: <u>Ricardo.Maestas@state.nm.us</u> New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

Re: Request for NMED to Use Its Authority to:

- Not change the 2024 date to stop waste disposal in the WIPP Permit
- Not allow the proposed new shaft and other facility expansions
- Enforce the legal limits for the amount and types of waste, including eliminating the "Volume of Record" from the WIPP Permit

Dear Mr. Maestas:

Since the 1970s when the Waste Isolation **Pilot** Plant (WIPP) was proposed, there have been concerns that the "pilot" could be expanded to be much more. We are at that point. As required by the New Mexico Environment Department (NMED) hazardous waste permit, WIPP is scheduled to stop receiving waste and begin closing the facility in 2024. But **the Department of Energy (DOE) wants NMED to renew that permit to allow the site to receive much more mixed chemical and transuranic (TRU – plutonium-contaminated) radioactive waste until 2052, or 2080, or ... essentially forever.**

NMED must renew the Permit so that New Mexico can regulate WIPP, but NMED does not have to

approve the "Forever WIPP" dates.

DOE's expansion plans include the mining of a new (fifth) shaft into the WIPP underground – 2,150 feet below ground surface. DOE has submitted a permit modification request and - without NMED acting on it – has awarded a \$75 million contract to begin shaft construction **before** NMED and public review as required by the hazardous waste laws and regulations.

DOE also has **other plans to expand WIPP** for high-level radioactive waste from Hanford, Washington and other sites: commercial waste from West Valley, New York; weapons-grade plutonium from the Savannah River Site in South Carolina; 50 years or more of waste from building new nuclear weapons; and even to create a surface storage facility.

DOE is supposed to find additional waste sites for this waste. It has not done its job. **DOE proposes** expansion of WIPP that violates the legal requirements and is using a "Volume of Record" to increase the amount of waste allowed for disposal by about 30 percent.

As a New Mexican, I want to see NMED enforce the legal requirements for WIPP. I ask that you not approve DOE's wishes for waste disposal for decades more and not allow the proposed expansions. Sincerely,

Basia Miller____

basia.miller5@gmail.com _____

From: To:	<u>Maestas, Ricardo, NMENV</u> <u>St John, Bobby - NWP; Chavez, Rick - RES; Day, Karen - RES; Brown, Michael (Mike) - FedNet; Navarrete, Martin - FedNet</u>
Cc:	McLean, Megan, NMENV; Biswell, David - NMED
Subject:	[EXTERNAL] FW: [EXT] WIPP Expansion: NO
Date:	Friday, February 21, 2020 7:58:03 AM

WARNING - EXTERNAL EMAIL

This message does not originate from a known WIPP email system. Use caution if this message contains attachments, links or requests for information.

-----Original Message-----From: KC Nelson <kc.nelson@comcast.net> Sent: Saturday, February 15, 2020 6:20 AM To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us> Subject: [EXT] WIPP Expansion: NO

We do not want to see expanded storage of nuclear waste at WIPP or anywhere else in New Mexico. Scientists concur that the waste is most safely stored in hard containers on the site where it is produced. It shouldn't be put on the road to travel across our highways and near communities.

Karen Nelson and Ron Pryor

Sent from my iPhone

February 16, 2020

Ricardo Maestas, WIPP Program Manager New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

Re: Request for NMED to Use Its Authority to:

- Not change the 2024 date to stop waste disposal in the WIPP Permit
- Not allow the proposed new shaft and other facility expansions
- Enforce the legal limits for the amount and types of waste, including eliminating the "Volume of Record" from the WIPP Permit

Dear Mr. Maestas:

Is this the same WIPP that we were initially led to believe would only contain low level waste such as contaminated gloves? Was it contaminated gloves that blew up and shut the place down for years? Keep high level waste out of WIPP and shut it down on schedule as promised.

Since the 1970s when the Waste Isolation **Pilot** Plant (WIPP) was proposed, there have been concerns that the "pilot" could be expanded to be much more. We are at that point.

As required by the New Mexico Environment Department (NMED) hazardous waste permit, WIPP is scheduled to stop receiving waste and begin closing the facility in 2024. But the Department of Energy (DOE) wants NMED to renew that permit to allow the site to receive much more mixed chemical and transuranic (TRU – plutonium-contaminated) radioactive waste until 2052, or 2080, or ... essentially forever.

NMED must renew the Permit so that New Mexico can regulate WIPP, but NMED does not have to approve the "Forever WIPP" dates.

DOE's expansion plans include the mining of a new (fifth) shaft into the WIPP underground – 2,150 feet below ground surface. DOE has submitted a permit modification request and - without NMED acting on it – has awarded a \$75 million contract to begin shaft construction before NMED and public review as required by the hazardous waste laws and regulations.

DOE also has other plans to expand WIPP for high-level radioactive waste from Hanford, Washington and other sites; commercial waste from West Valley, New York; weapons-grade plutonium from the Savannah River Site in South Carolina; 50 years or more of waste from building new nuclear weapons; and even to create a surface storage facility.

DOE is supposed to find additional waste sites for this waste. It has not done its job. DOE proposes expansion of WIPP that violates the legal requirements and is using a "Volume of Record" to increase the amount of waste allowed for disposal by about 30 percent.

As a New Mexican, I demand that NMED enforce the legal requirements and not approve DOE's wishes for waste disposal for decades more and not allow the proposed expansions.

Sincerely,

Jon Klingel 47 Star Vista Rd., Santa Fe, NM 87505 February <u>8</u>, 2020

Ricardo Maestas, WIPP Program Manager By email to: <u>Ricardo.Maestas@state.nm.us</u> New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

Re: Request for NMED to Use Its Authority to:

- Not change the 2024 date to stop waste disposal in the WIPP Permit
- Not allow the proposed new shaft and other facility expansions
- Enforce the legal limits for the amount and types of waste, including eliminating the "Volume of Record" from the WIPP Permit

Dear Mr. Maestas:

Since the 1970s when the Waste Isolation **Pilot** Plant (WIPP) was proposed, there have been concerns that the "pilot" could be expanded to be much more. We are at that point.

As required by the New Mexico Environment Department (NMED) hazardous waste permit, WIPP is scheduled to stop receiving waste and begin closing the facility in 2024. But the Department of Energy (DOE) wants NMED to renew that permit to allow the site to receive much more mixed chemical and transuranic (TRU – plutonium-contaminated) radioactive waste until 2052, or 2080, or ... essentially forever.

NMED must renew the Permit so that New Mexico can regulate WIPP, but NMED does not have to approve the "Forever WIPP" dates.

DOE's expansion plans include the mining of a new (fifth) shaft into the WIPP underground – 2,150 feet below ground surface. DOE has submitted a permit modification request and - without NMED acting on it – has awarded a \$75 million contract to begin shaft construction before NMED and public review as required by the hazardous waste laws and regulations.

DOE also has other plans to expand WIPP for high-level radioactive waste from Hanford, Washington and other sites; commercial waste from West Valley, New York; weapons-grade plutonium from the Savannah River Site in South Carolina; 50 years or more of waste from building new nuclear weapons; and even to create a surface storage facility.

DOE is supposed to find additional waste sites for this waste. It has not done its job. DOE proposes expansion of WIPP that violates the legal requirements and is using a "Volume of Record" to increase the amount of waste allowed for disposal by about 30 percent.

As a New Mexican, I demand that NMED enforce the legal requirements and not approve DOE's wishes for waste disposal for decades more and not allow the proposed expansions.

Sincerely,

Clearly print your name: Y- M Lee_

PM

RECEIVED

FEB 2 7 2020

NMED

WH

AM

Contact information:

• •

. .

.

ATTACHMENT A

GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION

ATTACHMENT A

GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION

TABLE OF CONTENTS

A-1	Facility Description	2
A-2	Description of Activities	3
A-3	Property Description	3
A-4	Facility Type	3
A-5	Waste Description	4
A-6	Chronology of Events Relevant to Changes in Ownership or Operational Control	6

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

1	ATTA	ACHMENT A
2 3		ITY DESCRIPTION AND S INFORMATION
4	A-1 Facility Description	
5	Abstract	
6	NAME OF FACILITY:	Waste Isolation Pilot Plant
7 8 9	OWNER and CO-OPERATOR:	U.S. Department of Energy <u>(DOE)</u> P.O. Box 3090 Carlsbad, NM 88221
10 11 12	CO-OPERATOR:	Nuclear Waste Partnership LLC P.O. Box 2078 Carlsbad, NM 88221
13 14 15 16	RESPONSIBLE OFFICIALS:	Gregory Sosson Acting Manager, DOE/Carlsbad Field Office Sean Dunagan Project Manager, Nuclear Waste Partnership LLC
17 18 19 20 21	FACILITY MAILING ADDRESS:	U.S. Department of Energy P.O. Box 3090 Carlsbad, NM 88221 <u>34 Louis Whitlock Road</u> <u>Carlsbad, New Mexico 88220</u>
22 23	FACILITY LOCATION:	30-<u>26</u> miles east of Carlsbad on the Jal Highway, in Eddy County.
24	TELEPHONE NUMBER:	575/234-7300
25	U.S. EPA I.D. NUMBER:	NM4890139088
26 27	GEOGRAPHIC LOCATION:	32° 22′ 30<u>11</u>″ N <u>-</u> 103° 47′ 30<u>29</u>″ W
28	DATE OPERATIONS BEGAN:	November 26, 1999
29		

1 <u>A-2 Description of Activities</u>

2 The Waste Isolation Pilot Plant (**WIPP**) is a facility for the management, storage, and disposal of

3 transuranic (**TRU**) mixed waste subject to regulation under 20.4.1.500 <u>New Mexico</u>

4 Administrative Code (NMAC), incorporating Title 40 of the Code of Federal Regulations (CFR)

5 <u>Part 264</u>. Both contact-handled (**CH**) and remote-handled (**RH**) TRU mixed wastes are

6 permitted for storage and disposal at the WIPP facility.

7 A-3 Property Description

The WIPP property has been divided into functional areas. The Property Protection Area (**PPA**), 8 surrounded by a chain-link security fence, which encompasses approximately 34 acres without 9 the New Filter Building (NFB) and approximately 44 acres with the NFB and provides security 10 and protection for all-the major surface structures. The DOE Off Limits Area encloses the PPA, 11 and is approximately 1,454 acres. These areas define the DOE exclusion zone within which 12 certain items and material are prohibited. The final zone is marked by the WIPP Site Boundary 13 (WIPP Land Withdrawal Area), a 16-section Federal land area (Land Withdrawal Area) under 14 the jurisdiction of the DOE. 15

16 A-4 Facility Type

There are three basic groups of structures associated with the WIPP facility: surface structures, 17 shafts and underground structures. The surface structures accommodate the personnel, 18 equipment, and support services required for the receipt, preparation, and transfer of TRU 19 mixed waste from the surface to the underground. There are two surface locations where TRU 20 mixed waste is managed and stored. The first area is the Waste Handling Building (WHB) 21 Container Storage Unit (WHB Unit) for TRU mixed waste management and storage. The WHB 22 Unit consists of the WHB contact-handled (CH)CH Bay, Room 108, and the remote-handled 23 (RH)RH Complex. The second area designated for managing and storing TRU mixed waste is 24 the Parking Area Container Storage Unit (**Parking Area Unit**PAU), an outside container storage 25 area which extends south from the WHB to the rail sidingchain-link security fence. The Parking 26 Area UnitPAU provides storage space for up to 50 loaded Contact-Handled PackagesCH 27 shipping containers referred to as CH packages and 14 loaded Remote-Handled PackagesRH 28 shipping containers referred to as RH packages on an asphalt and concrete surface. Permit 29 Part 3 of the permit authorizes the storage and management of CH and RH TRU mixed waste 30 containers in these two surface locations. The technical requirements of 20.4.1.500 NMAC 31 (incorporating 40 CFR §§264.170 to 264.178) are applied to the operation of the WHB Unit and 32 the Parking Area UnitPAU. Permit Attachment A1 describes the container storage units, the 33 TRU mixed waste management facilities and operations, and compliance with the technical 34 requirements of 20.4.1.500 NMAC (incorporating 40 CFR §§264.170 to 264.178). 35 Four vertical shafts connect the surface facility to the underground. These are the Waste Shaft, 36

the Salt Handling Shaft, the Exhaust Shaft, and the Air Intake Shaft. The Waste Shaft is the only shaft used to transport TRU mixed waste to the underground. The WIPP <u>facility</u> underground

structures are located in a mined salt bed <u>approximately</u> 2,150 feet below the surface. The

underground facility is defined in 20.4.1.100 NMAC (incorporating 40 CFR §260.10) as a

41 <u>"miscellaneous unit." As a miscellaneous unit, hazardous waste management units within the</u>

repository are subject to permitting according to 20.4.1.900 and 20.4.1.901 NMAC

43 (incorporating 40 CFR Part 270) and are regulated under 20.4.1.500 NMAC (incorporating 40

44 <u>CFR Part 264, Subpart X, Miscellaneous Units).</u>

- 1 The WIPP is a geologic repository mined within a bedded salt formation, which is defined in
- 2 20.4.1.100 NMAC (incorporating 40 CFR §260.10) as a miscellaneous unit. As such, hazardous
- 3 waste management units within the repository are subject to permitting according to 20.4.1.900
- 4 and .901 NMAC (incorporating 40 CFR §270), and are regulated under 20.4.1.500 NMAC,
- 5 Miscellaneous Units.

6 The underground structures include the underground Hazardous Waste Disposal Units

(HWDUs), an areaareas for future underground HWDUs, the shaft pillar area, interconnecting
drifts and other areas unrelated to the Hazardous Waste Facility Permit. The underground
HWDUs are defined as waste panels, each consisting of seven rooms and two access drifts.
The WIPP <u>facility</u> underground area is designated as Panels 1 through 10, although only Panels
1 through 8 will be used under the terms of this permitPermit. Each of the seven rooms is
approximately 300 feet long, 33 feet wide and 13 feet high. <u>Permit</u>Part 4 of the permit
authorizes the management and disposal of CH and RH TRU mixed waste containers in

- 14 underground HWDUs.
- 15 The Disposal Phase of the WIPP Project consists of receiving loaded CH and RH TRU mixed

16 waste shipping containerspackages, unloading and transporting the waste containers to the

17 underground HWDUs, emplacing the waste in the underground HWDUs, and subsequently

achieving closure of the underground HWDUs in compliance with applicable State state and

¹⁹ Federal <u>federal</u> regulations. As required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601),

the Permittees shall ensure that the environmental performance standards for a miscellaneous

unit, which are applied to the underground HWDUs in the geologic repository, will be met.

Permit Attachment A2 describes the underground HWDUs, the TRU mixed waste management facilities and operations, and compliance with the technical requirements of 20.4.1.500 NMAC

facilities and operations, and compliance with the technical requirements of 20.4.1.500 NMAC
 <u>(incorporating 40 CFR Part 264)</u>. Permit Attachments G, G1, and G2 describe the closure

25 <u>activities.</u>

26 <u>A-5 Waste Description</u>

27 Wastes destined for <u>disposal at the WIPP facility</u> are byproducts of nuclear weapons production

and have been identified in terms of waste streams based on the processes that produced

them. Each waste<u>Waste</u> streams identified by generators is <u>are</u> assigned to a Waste Summary

30 Category to facilitate RCRA waste characterization, and reflect the final waste forms acceptable

31 for WIPP transportation and disposal. Details regarding the Summary Category Groups and

32 waste characterization can be found in Permit Attachment C.

33 These Waste Summary Categories are:

34 <u>S3000 Homogeneous Solids</u>

35 Solid process residues defined as solid materials, excluding soil, that do not meet the

36 applicable regulatory criteria for classification as debris [20.4.1.800 NMAC, (incorporating

³⁷ 40 CFR §268.2(g) and (h))]. Solid process residues include inorganic process residues,

inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams are

included in this Waste Summary Category based on the specific waste stream types and
 final waste form. This category includes wastes that are at least 50 percent by volume

41 solid process residues.

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

- 1 <u>S4000–Soils/Gravel</u>
- This waste summary category includes waste streams that are at least 50 percent by
 volume soil. Soils are further categorized by the amount of debris included in the matrix.
- 4 <u>S5000—Debris Wastes</u>
- 5 This waste summary category includes waste that is at least 50 percent by volume
- 6 materials that meet the NMAC criteria for classification as debris (20.4.1.800 NMAC
- 7 (incorporating 40 CFR §268.2)). Debris means solid material exceeding a 2.36 inch (60
- 8 millimeter) particle size that is intended for disposal and that is: 1) a manufactured object,
- 9 2) plant or animal matter, or 3) natural geologic material.
- ¹⁰ The S5000 Waste Summary Category includes metal debris, metal debris containing lead,
- inorganic nonmetal debris, asbestos debris, combustible debris, graphite debris,
- heterogeneous debris, and composite filters, as well as other minor waste streams.
- 13 Particles smaller than 2.36 inches in size may be considered debris if the debris is a
- 14 manufactured object and if it is not a particle of S3000 or S4000 material.
- ¹⁵ If a waste does not include at least 50 percent of any given category by volume,
- 16 characterization shall be performed using the waste characterization process required for the
- 17 category constituting the greatest volume of waste for that waste stream.
- 18 Wastes may be generated at the WIPP facility as a direct result of managing the TRU and TRU
- ¹⁹ mixed wastes received from the off-site generators. Such waste may be generated in either the
- 20 WHB or the underground. This waste is referred to as "derived waste-<u>", which means its</u>
- 21 <u>hazardous waste characteristics are derived from the off-site waste that produced it.</u> All sSuch
- derived waste will be placed in the rooms in HWDUs along with the TRU mixed waste for
- 23 disposal.
- Non-mixed hazardous wastes generated at the WIPP<u>facility</u>, through activities where contact
- with TRU mixed waste does not occur, are characterized, placed in containers, and stored (for
- periods not exceeding the limits specified in 20.4.1.300 NMAC (incorporating 40 CFR §262.17))
- 27 until they are transported off site for treatment and/or disposal at a permitted designated facility.
- This waste generation and accumulation activity, when performed in compliance with 20.4.1.300
- ²⁹ NMAC (incorporating 40 CFR <u>§Part</u>262), is not subject to RCRA permitting requirements and,
- as such, is not addressed in the permit, with the exception of the requirements of 20.4.1.300
- NMAC (incorporating 40 CFR Part 262, Subpart M), which are addressed in Permit Attachment
 D.

1 <u>A-6 Chronology of Events Relevant to Changes in Ownership or Operational Control</u>

2 3 4 5 6 7 8 9	December 19, 1997	The New Mexico Environment Department (NMED) received notification of a change of name/ownership from Westinghouse Electric Corporation to CBS Corporation. The WIPP <u>facility</u> Management and Operating Contractor (MOC), Westinghouse Waste Isolation Division (WID), became a division of Westinghouse Electric Company, which in turn was a division of CBS Corporation. Notification to NMED was made by the permit applicant in a letter dated December 18, 1997. The <u>Permit permit</u> application was under review, but a draft <u>Permit permit</u> was not yet issued.
10 11 12 13 14 15 16 17	September 22, 1998	<u>The</u> NMED received notification of a pending transfer of ownership for the MOC, Westinghouse WID, from CBS Corporation to an as-yet-to-be- named limited liability company owned jointly by British Nuclear Fuels, plc and Morrison-Knudsen Corporation. The transfer of ownership was scheduled to occur on or about December 15, 1998. Notification to NMED was made by the permit applicant in a letter dated September 17, 1998. The draft <u>Permitpermit</u> had been issued for public comment, but the final <u>Permitpermit</u> was not yet issued.
18 19 20 21 22 23 24 25 26	March 9, 1999	The NMED again received notification of the pending divestiture of the MOC, Westinghouse WID, by CBS Corporation to the limited liability company owned jointly by British Nuclear Fuels, plc and Morrison-Knudsen Corporation known as MK/BNFL GESCO LLC. The new MOC would be renamed to Westinghouse Government Environmental Services Company LLC (WGES). Notification to NMED was made by the permit applicant in a letter dated March 2, 1999. The public hearing on the Permitpermit was underway, but the final Permitpermit was not yet issued.
27 28 29 30 31 32 33 34 35 36	March 26, 1999	The NMED received official notification of the divestiture of Westinghouse Electric Company by CBS Corporation to MK/BNFL GESCO LLC effective March 22, 1999. The MOC was renamed Westinghouse Government Environmental Services Company LLC (WGES) <u>WGES</u> , of which Westinghouse Waste Isolation Division-<u>WID</u> was a division. This transaction constituted a change of operational control under 20.4.1.900 NMAC (incorporating 40 CFR §270.40). Notification to NMED was made by the permit applicant in a letter dated March 24, 1999. The public hearing on the <u>Permitpermit</u> was nearly concluded, but the final <u>Permitpermit</u> was not yet issued.
37 38 39 40 41	April 28, 1999	<u>The</u> NMED received a revised Part A Permit Application in a letter dated April 21, 1999, reflecting that the Westinghouse Waste Isolation Division<u>WID</u>, co-operator of the WIPP hazardous waste facility, was now a part of WGES. However, the final <u>Permit</u>permit, issued October 27, 1999, did not reflect the change in ownership.
42 43 44	July 25, 2000	<u>The</u> NMED received a Class 1 permit modification in a letter dated July 21, 2000, changing the name in the Permit from Westinghouse Electric Corporation to Westinghouse Government Environmental Services

1 2 3 4		Company LLC (WGES) <u>WGES</u> , Waste Isolation Division (WID) <u>WID</u> . However, tThis notification did not constitute the required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the permit to a new operator.
5 6 7 8 9 10 11 12 13	December 15, 2000	The DOE announced that it had awarded a five-year contract for management and operation of the WIPP facility to Westinghouse TRU Solutions LLC, a limited liability company owned jointly by WGES LLC and Roy F. Weston, Inc. The announcement further stated that, following a brief transition period, the new contractor would assume MOC responsibilities on February 1, 2001. This transaction constituted a change of operational control under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) requiring a Class 1 permit modification with prior written approval of NMED.
14 15 16 17 18 19 20 21	February 5, 2001	<u>The</u> NMED received a Class 1 permit modification in a letter dated February 2, 2001, which notified NMED of an organizational name change of the MOC from Westinghouse Government Environmental Services Company LLC Waste Isolation Division<u>WGES WID</u> to Westinghouse TRU Solutions LLC. However, t<u>This notification did not</u> constitute the required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the permit to a new operator.
22 23 24 25 26 27	December 31, 2002	<u>The</u> NMED received a Class 1 permit modification in a letter dated December 27, 2002, which changed the name of the MOC from Westinghouse TRU Solutions LLC to Washington TRU Solutions LLC (<u>WTS</u>). Again, t <u>T</u> his notification did not constitute the required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the permit to a new operator.
28 29 30 31	February 28, 2003	<u>The</u> NMED received a Class 1 permit modification requiring prior agency approval in a letter dated February 28, 2003, to satisfy the requirements specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.40) to reflect the transfer of the permit to a new operator.
32 33 34 35 36 37 38 39	September 16, 2004	The NMED received a Class 1 permit modification requiring prior agency approval in a letter dated September 16, 2004, describing a change of ownership of Washington TRU Solutions LLC (WTS)WTS. WTS is owned jointly by WGES, managing member, and Weston Solutions, Inc. WGES had been owned jointly by Washington Group International, Inc. (WGI), and BNFL Nuclear Services, Inc. However, WGI has acquired BNFL's prior interest in the former Westinghouse government services businesses, which includes BNFL's prior interest in WGES.
40 41 42 43 44	August 6, 2007	<u>The</u> NMED received notification in a letter dated August 2, 2007 of the pending acquisition of WGI by URS Corporation at an unknown future date. This acquisition would be related to operational control, because WGI is the sole owner of WGES, managing member of the joint venture, along with Weston Solutions, Inc., that owns WTS, the WIPP <u>facility</u>

	1 2		MOC. This notification was submitted to assure compliance with 20.4.1.900 NMAC (incorporating 40 CFR §270.40(b)).
	3 4 5 6 7 8	November 26, 2007	<u>The</u> NMED received a Class 1 permit modification requiring prior agency approval in a letter dated November 19, 2007, describing a change of ownership of WTS. On November 15, 2007, WGI was acquired by URS Corporation. WTS is owned jointly by WGES, managing member, and Weston Solutions, Inc. WGES, formerly owned by WGI, is now owned by URS Corporation.
	9 10 11 12 13 14	October 1, 2012	<u>The NMED received a Class 1 permit modification requiring prior agency</u> approval in a letter dated June 25, 2012 describing a change in the MOC for the WIPP facility. The new MOC for the WIPP facility will be Nuclear Waste Partnership LLC. The new MOC is comprised of URS Energy & Construction, Inc. and Babcock and Wilcox Technical Services Group, Inc.
	15 16 17 18 19 20	April 1, 2014	URS announced an organizational realignment to move Global Management and Operational Services Group (GMOS) from URS Energy & Construction to URS Federal Services Division. Nuclear Waste Partnership LLC is part of GMOS and remains in this group. The MOC is comprised of URS Federal Services, Inc. and Babcock and Wilcox Technical Services Group, Inc.
	21 22 23 24 25 26 27	January 5, 2015	On January 5, 2015 URS merged with AECOM. The WIPP Management and Operating Contractor (MOC), Nuclear Waste Partnership LLC, is comprised of URS Energy & Construction, Inc. (an organization within AECOM) and Babcock and Wilcox Technical Services Group, Inc. This merger is therefore not related to a change in operational control because URS Energy & Construction, Inc. continues to be 70% owner of Nuclear Waste Partnership LLC.
	28 29 30 31 32 33	July 1, 2015	On June 8, 2015 the Babcock & Wilcox Company announced its intent to change the name to BWXT Technical Services Group, Inc. (BWXT TSG). This change was effective July 1, 2015. No changes are being made to the Management and Operating Contractor (MOC). The MOC is comprised of URS Energy & Construction, Inc. and BWXT Technical Services Group, Inc.
	34 35 36 37 38 39 40 41 42	September 19, 2016	URS Energy & Construction, Inc. changed its name to AECOM Energy & Construction, Inc. This name change was effective September 19, 2016. No changes are being made to the Management and Operating Contractor (MOC). This is a name change only; there was no change in operational control. The MOC, Nuclear Waste partnership LLC, is comprised of AECOM Energy & Construction, Inc. and BWXT Technical Services Group, Inc. This change does not constitute the required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the <u>Permit</u> to a new operator.

1

I

1	January 31, 2020	Lindsay Goldberg/American Securities purchased AECOM's
2		Management Services group, forming a new company named Amentum.
3		Included in that transaction was AECOM Energy & Construction, Inc.,
4		which continues to be the legal guarantor and majority owner of the MOC,
5		Nuclear Waste Partnership LLC. No changes are being made to the
6		MOC. Nuclear Waste Partnership LLC is still comprised of AECOM
7		Energy & Construction, Inc. and BWXT Technical Services Group, Inc.
8		This is a change in ultimate parent company only; there was no change in
9		operational control. Therefore, this change does not constitute the
10		required permit modification under 20.4.1.900 NMAC (incorporating 40
11		CFR §270.40) necessary to reflect the transfer of the permit to a new
12		operator.

ATTACHMENT A1 CONTAINER STORAGE

ATTACHMENT A1

CONTAINER STORAGE

TABLE OF CONTENTS

Introd	uction			4
A1-1	Contai	ner Storage	e	4
		la Containers with Liquid		
		Description of Containers		
		A1-1b(1)	CH TRU Mixed Waste Containers	5
		A1-1b(2)	RH TRU Mixed Waste Containers	7
			Container Compatibility	
	A1-1c	Descriptio	n of the Container Storage Units	8
		A1-1c(1)	Waste Handling Building Container Storage Unit (WHB Unit)	8
		A1-1c(2)	Parking Area Container Storage Unit (PAU)	18
	A1-1d	Container	Management Practices	19
		A1-1d(1)	Derived Waste	
		A1-1d(2)	CH TRU Mixed Waste Handling	
		A1-1d(3)	RH TRU Mixed Waste Handling	
		A1-1d(4)	Handling Waste in Shielded Containers	
	A1-1e		IS	
		· · ·	WHB Unit	
		A1-1e(2)		
	A1-1f		ent	
		A1-1f(1)		
		A1-1f(2)	, , , , , , , , , , , , , , , , , , , ,	
			equirements for Ignitable, Reactive, and Incompatible Waste	
	A1-1i	Control of	Run On	34
Refere	ences			35

LIST OF TABLES

2 Table

1

Title

- 3 Table A1-1 TRU Mixed Waste Containers
- 4 Table A1-2 CH TRU Mixed Waste Handling Equipment Capacities
- 5 Table A1-3 RH TRU Mixed Waste Handling Equipment Capacities
- 6 Table A1-1 Basic Design Requirements, Principal Codes, and Standards
- 7 Table A1-2 Waste Handling Equipment Capacities
- 8 Table A1-3 RH TRU Mixed Waste Handling Equipment Capacities
- 9

10

LIST OF FIGURES

- 11 Figure Title
- Figure A1-1 Waste Handling Building CH TRU Mixed Waste Container Storage and Surge
 Areas
- 14 Figure A1-1a Waste Handling Building Plan (Ground Floor)
- 15 Figure A1-1b Waste Handling Building Plan (Room 108 Detail)
- 16 Figure A1-2 Parking Area Container Storage and Surge Areas
- 17 Figure A1-3 Standard 55-Gallon Drum (Typical)
- 18 Figure A1-4 Standard Waste Box
- 19 Figure A1-5 Ten-Drum Overpack
- 20 Figure A1-6 85-Gallon Drum
- 21 Figure A1-8a TRUPACT-II Shipping Container for CH Transuranic Mixed Waste (Schematic)
- 22 Figure A1-8b Typical HalfPACT Shipping Container for CH Transuranic Mixed Waste
- 23 (Schematic)
- 24 Figure A1-10 Facility Pallet for Seven-Pack of Drums
- 25 Figure A1-10a Typical Containment Pallet
- 26 Figure A1-11 Facility Transfer Vehicle, Facility Pallet, and Typical Pallet Stand
- 27 Figure A1-12 TRUPACT-II Containers on Trailer
- Figure A1-13 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process
 Flow Diagram
- 30 Figure A1-14a RH Bay Ground Floor
- 31 Figure A1-15 100-Gallon Drum
- 32 Figure A1-16 Facility Canister Assembly
- 33 Figure A1-16a RH-TRU 72-B Canister Ássembly
- 34 Figure A1-17a RH Bay, Cask Unloading Room, Hot Cell, Facility Cask Loading Room
- 35 Figure A1-17b RH Hot Cell Storage Area
- 36 Figure A1-17c RH Canister Transfer Cell Storage Area
- 37 Figure A1-17d RH Facility Cask Loading Room Storage Area
- 38 Figure A1-18 RH-TRU 72-B Shipping Cask on Trailer
- 39 Figure A1-19 CNS 10-160B Shipping Cask on Trailer
- 40 Figure A1-20 RH-TRU 72-B Shipping Cask for RH Transuranic Waste (Schematic)
- 41 Figure A1-21 CNS 10-160B Shipping Cask for RH Transuranic Waste (Schematic)
- 42 Figure A1-22a RH-TRU 72-B Cask Transfer Car
- 43 Figure A1-22b CNS 10-160B Cask Transfer Car
- 44 Figure A1-23 RH Transuranic Waste Facility Cask
- 45 Figure A1-24 RH Facility Cask Transfer Car (Side View)

- 46 Figure A1-25 CNS 10-160B Drum Carriage
- Figure A1-26 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram
 for RH-TRU 72-B Shipping Cask
- Figure A1-27 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram
 for CNS 10-160B Shipping Cask
- 51 Figure A1-28 Schematic of the RH Transuranic Mixed Waste Process for RH-TRU 72-B 52 Shipping Cask
- 53 Figure A1-29 Schematic of the RH Transuranic Mixed Waste Process for CNS 10-160B 54 Shipping Cask
- 55 Figure A1-30 RH Shielded Insert Assembly
- 56 Figure A1-31 Transfer Cell Shuttle Car
- 57 Figure A1-32 Facility Rotating Device
- 58 Figure A1-33 Typical TRUPACT-III
- 59 Figure A1-34 Typical Standard Large Box 2
- 60 Figure A1-35 Typical Yard Transfer Vehicle
- 61 Figure A1-36 Payload Transfer Station
- 62 Figure A1-37 Typical Shielded Container

ATTACHMENT A1

CONTAINER STORAGE

3 Introduction

1

2

Management and storage of transuranic (TRU) mixed waste in the Waste Isolation Pilot Plant
(WIPP) facility is subject to regulation under 20.4.1.500 New Mexico Administrative Code
(NMAC). The technical requirements of 20.4.1.500 NMAC (incorporating <u>Title</u> 40 <u>of the Code of</u>
<u>Federal Regulations (CFR)</u> §§264.170 to 264.178) are applied to the operation of the Waste
Handling Building (WHB) Container Storage Unit (WHB Unit) (Figure M-1A1-4), and the
Parking Area Container Storage Unit (Parking Area UnitPAU) (Figure M-2A1-2). This Permit

10 Attachment describes the container storage units, the TRU mixed waste management facilities

and operations, and compliance with the technical requirements of 20.4.1.500 NMAC. The

configuration of the WIPP facility consists of completed structures, including all-buildings_± and

13 systems<u>, and components</u> for the operation of the facility.

14 A1-1 Container Storage

15 The waste containers that will be used at the WIPP facility qualify as "containers," in accordance

with 20.4.1.101 NMAC (incorporating 40 CFR §260.10). That is, they are "portable devices in

17 which a material is stored, transported, treated, disposed of, or otherwise handled."

18 A1-1a Containers with Liquid

¹⁹ The Permit Treatment, Storage, and Disposal Facility (**TSDF**) Waste Acceptance Criteria (**WAC**)

and the Waste Analysis Plan (Permit Attachment C) prohibit the shipment of waste to the WIPP

<u>facility</u> with liquid in excess of one percent of the volume of the waste container (e.g., drum,

standard waste box [SWB], or canister). Since the maximum amount of liquid is one percent,
 calculations made to determine the secondary containment as required by 20.4.1.500 NMAC

calculations made to determine the secondary containment as required by 20.4.1.500 NMA
 (incorporating §264.175) are based on ten percent of one percent of the volume of the

containers, or one percent of the largest container, whichever is greater.

26 A1-1b Description of Containers

27 The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.171) requires that containers

holding waste be in good condition as provided in Permit Part 3, Section 3.3, Condition of

29 <u>Containers</u>. Waste containers shall be in good condition (e.g., high integrity, intact, no severe

30 <u>rusting, no apparent structural defects, no signs of pressurization</u>) prior to shipment from the <u>a</u>

31 generator sites <u>site</u>, i.e., containers will be of high integrity, intact, and free of surface

32 contamination above DOE limits. The Manager of the U.S. Department of Energy (DOE)

Carlsbad Field Office has the authority to suspend a generator's certification to ship TRU mixed

waste to the WIPP facility should the generator fail to meet this requirement. The containers will

35 be certified free of surface contamination above DOE limits upon shipment. This condition shall

36 be verified upon receipt of the waste at WIPP. The level of rigor applied in these areas to ensure 37 container integrity and the absence of external contamination on both ends of the transportation

container integrity and the absence of external contamination on both ends of the transportation
 process will ensures that waste containers entering the waste management process line at the

WIPP <u>facility</u> meet the applicable Resource Conservation and Recovery Act (**RCRA**)

40 requirements for container condition.

- 1 <u>Transuranic mixed waste containers meet the requirements for U.S. Department of</u>
- 2 Transportation (DOT) specification 7A regulations. These containers are required to be vented
- 3 through one or more DOE-approved filter vents to prevent internal container pressurization
- 4 caused by gas generation and to prevent radioactive particulate material from escaping.

5 A1-1b(1) CH TRU Mixed Waste Containers

- 6 Contact₋₋handled (**CH**) TRU mixed waste containers will beare either 55-gal gallon (gal) (208-
- 7 L<u>liter (L)</u>) drums singly or arranged into 7<u>seven</u>-packs, 85-gal (322-L) drums singly or arranged
- ⁸ into 4<u>four</u>-packs, 100-gal (379 L) drums singly or arranged into 3<u>three</u>-packs, ten-drum
- 9 overpacks (TDOP), standard large box 2s (SLB2), or SWBs. These CH mixed waste containers
- 10 may be either direct-loaded or used to overpack CH TRU mixed containers that are leaking or
- are not in good condition. The CH TRU mixed waste containers are constructed of steel. Drums
- 12 may also contain rigid, molded polyethylene (or other material compatible with TRU mixed
- 13 <u>waste) liners.</u> A summary description of each CH TRU mixed waste container type is provided
- belowin Table A1-1, and the containers are illustrated in Figures M-3 through M-8. The
- 15 maximum loaded, or gross, weights of these containers are listed in Table A1-2.
- 16 Standard 55-Gallon Drums
- 17 Standard 55-gal (208-L) drums meet the requirements for U.S. Department of Transportation
- 18 (**DOT**) specification 7A regulations.
- 19 A standard 55-gal (208-L) drum has a gross internal volume of 7.4 cubic feet (ft³) (0.21 cubic
- 20 meters (m³)). Figure A1-3 shows a standard TRU mixed waste drum. One or more filtered vents
- 21 (as described in Section A1-1d(1)) will be installed in the drum lid to prevent the escape of any
- 22 radioactive particulates and to eliminate any potential of pressurization.
- 23 Standard 55-gal (208-L) drums are constructed of mild steel and may also contain rigid, molded
- 24 polyethylene (or other compatible material) liners. These liners are procured to a specification
- 25 describing the functional requirements of fitting inside the drum, material thickness and
- tolerances, and quality controls and required testing. A quality assurance surveillance program
- 27 is applied to all procurements to verify that the liners meet the specification.
- 28 Standard 55-gal (208-L) drums may be used to collect derived waste.
- 29 Standard Waste Boxes
- 30 The SWBs meet all the requirements of DOT specification 7A regulations.
- One or more filtered vents (as described in Section A1-1d(1)) will be installed in the SWB body
- 32 and located near the top of the SWB to prevent the escape of any radioactive particulates and
- ³³ to eliminate any potential of pressurization. They have an internal volume of 66.3 ft³ (1.88 m³).
- ³⁴ Figure A1-4 shows a SWB.
- ³⁵ The SWB is the largest container that may be used to collect derived waste.
- 36 Ten-Drum Overpack

- 1 The TDOP is a metal container, similar to a SWB, that meets DOT specification 7A and is
- 2 certified to be noncombustible and to meet all applicable requirements for Type A packaging.
- 3 The TDOP is a welded-steel, right circular cylinder, approximately 74 inches (in.) (1.9 meters
- 4 (m)) high and 71 in. (1.8 m) in diameter (Figure A1-5). The maximum loaded weight of a TDOP
- 5 is 6,700 pounds (lbs) (3,040 kilograms (kg)). A bolted lid on one end is removable; sealing is
- 6 accomplished by clamping a neoprene gasket between the lid and the body. One or more filter
- 7 vents are located near the top of the TDOP on the body to prevent the escape of any
- 8 radioactive particulates and to eliminate any potential of pressurization. A TDOP may contain up
- 9 to ten standard 55-gal (208-L) drums or one SWB. TDOPs may be used to overpack drums or
- 10 SWBs containing CH TRU mixed waste. The TDOP may also be direct loaded with CH TRU
- 11 mixed waste. Figure A1-5 shows a TDOP.
- 12 Eighty-Five Gallon Drum
- 13 The 85-gal (322-L) drums meet the requirements for DOT specification 7A regulations. An 85-
- 14 gal (322-L) drum has a gross internal volume of 11.4 ft³ (0.32 m³). One or more filtered vents
- 15 (as described in Section A1-1d(1)) will be installed in the 85-gal drum to prevent the escape of
- ¹⁶ any radioactive particulates and to eliminate any potential of pressurization.
- 17 85-gal (322-L) drums are constructed of mild steel and may also contain rigid, molded
- 18 polyethylene (or other compatible material) liners. These liners are procured to a specification
- 19 describing the functional requirements of fitting inside the drum, material thickness and
- 20 tolerances, and quality controls and required testing. A quality assurance surveillance program
- 21 is applied to all procurements to verify that the liners meet the specification.
- ²² The 85-gal (322-L) drum, which is shown in Figure A1-6, will be used for overpacking
- 23 contaminated 55-gal (208 L) drums at the WIPP facility. The 85-gal drum may also be direct
- 24 loaded with CH TRU mixed waste.
- ²⁵ 85-gal (322-L) drums may be used to collect derived waste.
- 26 <u>100-Gallon Drum</u>
- ²⁷ 100-gal (379-L) drums meet the requirements for DOT specification 7A regulations.
- A 100-gal (379-L) drum has a gross internal volume of 13.4 ft³ (0.38 m³). One or more filtered
- vents (as described in Section A1-1d(1) will be installed in the drum lid or body to prevent the
- escape of any radioactive particulates and to eliminate any potential of pressurization.
- ³¹ 100-gal (379-L) drums are constructed of mild steel and may also contain rigid, molded
- 32 polyethylene (or other compatible material) liners. These liners are procured to a specification
- 33 describing the functional requirements of fitting inside the drum, material thickness and
- 34 tolerances, and quality controls and required testing. A quality assurance surveillance program
- is applied to all procurements to verify that the liners meet the specification.
- ³⁶ 100-gal (379-L) drums may be direct loaded.

- 1 <u>Standard Large Box 2</u>
- 2 The SLB2 meets the requirements of DOT specification 7A requirements. The SLB2 is a welded
- ³ steel container with a gross internal volume of 261 ft³ (7.39 m³).
- 4 One or more filtered vents will be installed in the SLB2 body and located near the top of the
- 5 SLB2 to prevent the escape of radioactive particulates and to prevent internal pressurization.
- 6 Figure A1-34 shows an SLB2.

7 A1-1b(2) RH TRU Mixed Waste Containers

- 8 Remote-<u>h</u>Handled (**RH**) TRU mixed waste containers include RH₋-TRU<u>72-B</u> Canisters, which
- 9 are received at the WIPP facility loaded singly in an RH-TRU 72-B cask; Facility Canisters,

10 which are used to configure 55-gal (208-L) drums for emplacement; shielded containers, which

are received in HalfPACTs; and 55-gallon-gal (208-L) drums, which are received in a CNS 10-

12 160B cask. The RH TRU mixed waste containers are constructed of steel. The shielded

13 container is constructed with approximately one inch of lead shielding on the sides and

14 approximately three inches of steel on the top and bottom of the container and is used to

- 15 emplace RH TRU mixed waste; however, the shielding allows it to be managed and stored in
- 16 accordance with CH TRU mixed waste handling practices. A summary description of each RH
- 17 TRU mixed waste container type is provided in Table A1-1, and the containers are illustrated in
- 18 Figures M-9 through M-11. The maximum loaded, or gross, weights of these containers are
- 19 listed in Tables A1-2 and A1-3.

20 RH TRU Canister

- 21 The RH TRU Canister is a steel single shell container which is constructed to be of high
- 22 integrity. An example canister is depicted in Figure A1-16a. The RH TRU Canister is vented and
- will have a nominal internal volume of 31.4 ft³ (0.89 m³) and shall contain waste packaged in
- small containers (e.g., drums) or waste loaded directly into the canister.
- 25 Standard 55-Gallon Drums
- 26 Standard 55-gal (208-L) drums meet the requirements for U.S. Department of Transportation
- 27 (DOT) specification 7A regulations. A detailed description of a standard 55-gallon drum is
- 28 provided above. Up to ten 55-gallon drums containing RH TRU mixed waste are arranged on
- ²⁹ two drum carriage units in the CNS 10-160B cask (up to five drums per drum carriage unit). The
- 30 drums are transferred to an RH TRU mixed waste Facility Canister that will contain three drums.
- 31 Shielded Container
- 32
- 33 Remote-Handled TRU mixed waste received at the WIPP facility in shielded containers will be
- ³⁴ arranged as three-packs. A summary description of the shielded container is provided below.
- ³⁵ The shielded container meets the requirements for DOT specification 7A (Figure A1-37).
- 36
- ³⁷ Each shielded container has a gross internal volume of 7.4ft³ (0.21m³). One or more filter vents
- 38 will be installed in the shielded container lid to prevent the escape of radioactive particulates
- 39 and to prevent internal pressurization. The shielded container is constructed with approximately
- 40 one inch of lead shielding on the sides and approximately three inches of steel on the top and

- 1 bottom of the container and will be used to emplace RH TRU mixed waste. The shielding will
- 2 allow it to be managed and stored as CH TRU mixed waste.

3 A1-1b(3) Container Compatibility

- 4 <u>All c</u>Containers <u>will beare</u> made of steel, and some <u>will</u> contain rigid, molded polyethylene liners.
- 5 The compatibility study, documented in Appendix C1 of the WIPP RCRA Part B Permit
- 6 Application (DOE, 1997a), included container materials to assure containers are compatible with
- 7 the waste. Therefore, these containers meet the requirements of 20.4.1.500 NMAC
- 8 (incorporating 40 CFR §264.172).
- 9 <u>A1-1c</u> Description of the Container Storage Units
- 10 A1-1c(1) Waste Handling Building Container Storage Unit (WHB Unit)
- 11 The Waste Handling Building (WHB)WHB is the surface facility where TRU mixed waste
- handling activities will take place (Figure M-12A1-1a). The WHB has a total area of
- approximately 84,000 square feet (ft^2) (7,804 square meters (m^2)) of which 32,307 ft² (3,001 m²)
- are designated for the waste handling and container storage of CH TRU mixed waste and
- 15 17,403 ft² (1,617 m²) are designated for handling and storage of RH TRU mixed waste, as
- shown in Figures <u>M-1, M-13 through M-16A1-1, A1-14a, and A1-17a, b, c, and d</u>. These areas
- are being permitted as<u>comprise</u> the WHB Unit. The concrete floors are sealed with a coating
- that is sufficiently impervious to the chemicals incontain leaks and spills of TRU mixed waste to
- ¹⁹ meet the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.175(b)(1)).<u>The</u>
- 20 concrete floors are sealed with a coating that has been demonstrated to be compatible with
- 21 TRU mixed waste.

22 CH Bay Surge Storage Area

- The Permittees will-coordinate shipments with the generator/storage sites in an attempt to 23 minimize the use of surge storage. However, there may be circumstances causing shipments to 24 arrive that would exceed the maximum capacity of the CH Bay Storage Area, as specified in 25 Permit Part 3, Table 3.1.1, WHB Unit. The Permittees may use the CH Bay Surge Storage Area 26 as specified in Permit Part 3, Section 3.1.1.3 (see Figure M-1A1-1) only when the maximum 27 capacities in the CH Bay Storage Area (except for the Shielded Storage Room) and the Parking 28 Area Unit are reached and at least one of the following conditions is met (as discussed in 29 Section A1-1e(2), the PAU may not be full, but the shipping package has reached day 59 of its 30 Nuclear Regulatory Commission (NRC) 60-day venting period limit, and the waste containers 31 must be removed from the shipping package and placed into storage in the WHB Unit): 32 Surface or underground waste handling equipment malfunctions prevent the 33 •
- 34 Permittees from moving waste to disposal locations;
- Hoisting or underground ventilation equipment malfunctions prevent the Permittees
 from moving waste into the underground;
- Power outages cause a suspension of waste emplacement activities;
- Inbound shipment delays are imminent because Parking Area Container Storage
 Unit<u>the PAU</u> Surge Storage is in use; or

- 1
- Onsite or offsite emergencies cause a suspension of waste emplacement activities.

2 The Permittees must notify <u>the NMED</u> and those on the e-mail notification list (as specified in

- Permit <u>Part 1, Sections 1.11 and <u>Permit Part 3, Section 3.1.1.4</u>) upon using the CH Bay Surge</u>
- 4 Storage<u>Area</u> and provide justification for its use.

5 CH TRU Mixed Waste

The Contact-Handled Packages CH packages used to transport TRU mixed waste containers 6 will beare received through one of three air-lock entries to the CH Bay of the WHB Unit. The 7 WHB heating, ventilation and air conditioning (**HVAC**) system maintains the interior of the WHB 8 at a pressure lower than the ambient atmosphere to ensure that air flows into the WHB, 9 preventing the inadvertent release of any hazardous or radioactive constituents contamination 10 as the result of a contamination event. The doors at each end of the air lock are interlocked to 11 prevent both from opening simultaneously and equalizing CH Bay pressure with outside 12 atmospheric pressure. 13

14 • TRUPACT-II and HalfPACT Management

15The CH Bay houses two TRUPACT-II Docks (**TRUDOCKs**), each equipped with16overhead cranes for opening and unloading Contact-Handled Packages17The TRUDOCKs are within the TRUDOCK Storage Area of the WHB Unit. The cranes18are rated to lift the Contact-Handled Packaging19package20contents. The cranes are designed to remain on their tracks and hold their20load even in the event of a design-basis earthquake.

- Upon receipt and removal of CH TRU mixed waste containers from the Contact-21 Handled PackagingCH package, the waste containers are required to be in good 22 condition as provided in Permit Part 3. The waste containers will beare visually 23 inspected for physical damage (severe rusting, apparent structural defects, signs of 24 pressurization, etc.) and leakage to ensure they are in good condition prior to storage. 25 Waste containers will are also be checked for external radiological surface 26 contamination through the use of swipes and radiation monitoring equipment. 27 28 consistent with radiological control procedures pursuant to 10 CFR Part 835. If a primary waste container is not in good condition, the Permittees will overpack the 29 container, repair/patch the container in accordance with 49 CFR §173 and §178 (e.g., 30 49 CFR §173.28), or return the container to the generator. The Permittees may initiate 31 local decontamination, return unacceptable containers to a DOE generator site or send 32 the Contact-Handled Package to a third party contractor. Decontamination activities 33 will not be conducted on containers which that are not in good condition, or which are 34 leaking. If the waste container is not in good condition, the Permittees will either 35 overpack the container with another approved container, repair/patch the container in 36 accordance with appropriate standards and guidance (e.g., 40 CFR §173.28), return 37 the container to the generator, or send the CH package to a third-party contractor. If 38 local decontamination activities are opted for, the work will be conducted in the WHB 39 Unit, consistent with radiological control procedureson the TRUDOCK. These 40 processes are described in Section A1-1d. 41
- 42 Once unloaded from the Contact-Handled Packaging<u>CH package</u>, CH TRU mixed 43 waste containers (7<u>seven</u>-packs, 3<u>three</u>-packs, 4<u>four</u>-packs, SWBs, or TDOPs) are

placed in one of two positions on the facility pallet or on a containment pallet. The waste containers are stacked, on the facility pallets (one- or two-high, depending on weight considerations). Waste on containment pallets <u>will beare</u> stacked one-high. The use of facility or containment pallets <u>will elevates</u> the waste at least 6 <u>inches (in.)</u> (15 <u>centimeters (cm)</u>) from the floor surface. Pallets of waste will are then be relocated to <u>maintained in</u> the CH Bay Storage Area of the WHB Unit for normal storage.

In addition, four Contact-Handled Packages<u>CH packages</u>, containing up to eight 7<u>seven</u>-packs, <u>3three</u>-packs, 4<u>four</u>-packs, SWBs, or four TDOPs, may occupy positions at the TRUDOCKs. If waste containers are left in this area, they will be in the Contact-Handled Package<u>CH package</u> with or without the shipping container lids removed. The maximum TRU mixed waste volume in containers in four Contact-Handled Packages is 640 ft³ (18.1 m³).

<u>TRUPACT-III Management</u>

1 2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20 21 The TRUPACT-III containing one SLB2 will be is transferred to a Yard Transfer Vehicle in the Parking Area UnitPAU using a forklift. The Yard Transfer Vehicle then transports the TRUPACT-III into the CH Bay through one of the airlocks and into Room 108 for unloading (Figure M-1A1-1b). The TRUPACT-III is first transported to the bolting station where the overpack cover and closure lid are removed using a bolting robot, or manually as required, and a monorail hoist. The TRUPACT-III is then moved to the payload Payload transfer Transfer station Station where the SLB2 is removed from the TRUPACT-III.

- The SLB2 will be s visually inspected for physical damage and leakage in a similar 22 manner as containers removed from a TRUPACT-II or HalfPACT (i.e., severe rusting, 23 apparent structural defects, or signs of pressurization) and for leakage to ensure it is in 24 good condition. The SLB2 will also beis also checked for external radiological surface 25 contamination through the use of swipes and radiation monitoring equipment. 26 consistent with radiological control procedures pursuant to 10 CFR Part 835. If the 27 SLB2 is not in good condition, the Permittees will repair/patch the container in 28 accordance with 49 CFR §173 and §178 (e.g., 49 CFR §173.28), or return the 29 container to the generator. The Permittees may initiate local decontamination, return 30 unacceptable containers to a DOE generator site or send the SLB2 to a third-party 31 contractor. Decontamination activities will not be conducted on containers that are not 32 in good condition or are leaking. If the waste container is not in good condition, the 33 Permittees will either repair/patch the container in accordance with appropriate 34 standards and guidance (e.g., 49 CFR §173.28), return the container to the generator, 35 or send the SLB2 to a third-party contractor. If local decontamination activities are 36 opted for, the work will be conducted in the WHB Unit consistent with radiological 37 control procedures pursuant to 10 CFR Part 835. 38
- 39Once the SLB2 is unloaded from the TRUPACT-III in Room 108, it will beis placed on40a facility pallet and moved to a pallet stand or floor storage location in the CH Bay or41Room 108 for storage or to the conveyance loading room for waste emplacement.

The CH Bay Storage Area, which is <u>As shown indicated</u> in Figure <u>M-1A1-1</u>, will be clearly
 marked to indicate the lateral limits of the storage area<u>the shaded areas of the CH Bay and</u>
 Room 108 (CH Bay Storage Area) are available for TRU mixed waste storage as long as

- 1 <u>sufficient aisle space (i.e., minimum of 44 in. (1.1 m)) is maintained</u>. This CH Bay Storage Area
- 2 will have a maximum capacity of 13 pallets (4,160 ft³ [118 m³]) of TRU mixed waste containers
- 3 during normal operations Transuranic mixed waste may be stored in the CH Bay Storage Area of
- 4 the WHB Unit in quantities not to exceed the maximum capacities specified in Permit Part 3,
- 5 <u>Table 3.1.1</u>.
- 6 The Derived Waste Storage Area of the WHB Unit is on the north wall of the CH Bay. This area
- 7 will-may contain containers up to the volume of a-an_SWB for collecting derived waste from all
- 8 TRU mixed waste handling processes in the WHB Unit. The Derived Waste Storage Area is
- ⁹ being permitted to allow<u>can accommodate</u> containers in size up to a <u>an</u> SWB to be used to
- accumulate derived waste. The TRU mixed waste volume stored in this area will be up to 66.3
- 11 ft³ (1.88 m³)not exceed the maximum capacity specified in Permit Part 3, Table 3.1.1. The
- derived waste containers in the Derived Waste Storage Area will beare stored on standard
- drum<u>containment</u> pallets, which are polyethylene trays with a grated deck, which will elevate the derived waste containers approximately <u>at least</u> 6 in. (15 cm) from the floor surface, and provide
- derived waste containers approximately <u>at least</u> 6 in. (15 cm) from the floor surfac
 approximately 50 gal (190 L) of secondary containment capacity.
- Aisle space shall be maintained in all WHB Unit TRU mixed waste storage areas. The aisle
- 17 space in the WHB Unit TRU mixed waste storage areas shall beis adequate to allow
- unobstructed movement of fire-fighting personnel, spill-control equipment, and decontamination
- 19 equipment that would be used in the event of an off-normal event. An <u>A minimum</u> aisle space
- ²⁰ <u>spacing</u> of 44 in. (1.1 m) between <u>loaded</u> facility pallets will be set maintained in all the WHB Unit
- TRU mixed waste storage areas. An aisle space of 60 in. (1.5 m) will be maintained between
- the west wall of the CH Bay and facility pallets.
- ²³ The WHB has been designed to meet DOE design and associated quality assurance
- requirements. The 2009 Amended Renewal Application, Chapter M1, Table M1-1 (DOE, 2009)
- 25 provided a summary of basic design requirements, principal codes, and standards for the WIPP
- ²⁶ <u>facility.</u> Table A1-1 summarizes basic design requirements, principal codes, and standards for
- 27 the WIPP facility. Appendix D2 of the WIPP RCRA Part B Permit Application (DOE, 1997a)
- 28 provided engineering design-basis earthquake and tornado reports. The design-basis
- 29 earthquake report provides the basis for seismic design of WIPP facility structures, including the
- 30 WHB foundation. The WIPP <u>facility</u> design-basis earthquake is 0.1 g. The WIPP <u>facility</u> design-
- basis tornado includes a maximum windspeed of 183 mi<u>les</u> per h<u>ou</u>r (**mi/hr**) (294.5 <u>kilometers</u>
- ³² <u>per hr (km/hr)</u>), which is the vector sum of all <u>the</u> velocity components. It is also limited to a
- translational velocity of 41 mi/hr (66 km/hr) and a tangential velocity of 124 mi/hr (200 km/hr).
- Other parameters are a radius of maximum wind of 325 ft (99 m), a pressure drop of 0.5 <u>pound</u>
- $\frac{\text{per square inch}(\text{Ib}/\text{per in.}^2)}{(3.4 \text{ kilopascals }[\text{kPa}])}$, and a rate-of-pressure drop of 0.09 pounds
- 36 <u>per square inch per second (Ib/in.²/s)</u> (0.6 <u>kilopascals per second (</u>kPa/s)). A design-basis flood 37 report is not available because flooding is not a credible phenomenon at the WIPP facility.
- report is not available because flooding is not a credible phenomenon at the WIPP facility.
 Design calculations for the probable maximum precipitation (PMP) event, provided in Appendix
- ³⁹ D7 of the WIPP RCRA Part B Permit Application (DOE, 1997a), illustrated run-on protection for
- 40 the WIPP facility.
- The WIPP facility does not lie within a 100-year floodplain. There are no major surface-water
- bodies within 5 miles (mi) (8 kilometers (km)) of the site, and the nearest river, the Pecos River,
- 43 is approximately 12 mi (19 km) away. The general ground elevation in the vicinity of the surface
- facilities (approximately 3,400 <u>feet (**ft**</u>) [1,036 <u>meters (**m**</u>)] above mean sea level) is about 500 ft
- (152 m) above the riverbed and 400 ft (122 m) above the 100-year floodplain. Protection from
- flooding or ponding caused by PMP events is provided by the diversion of water away from the

- 1 WIPP facility by a system of peripheral interceptor berms and dikes. Additionally, grade
- 2 elevations of roads and surface facilities are designed so that storm water will not collect within
- the Property Protection Area under the most severe conditions.
- 4 The following are the major pieces of equipment that will beare used to manage CH TRU mixed
- 5 waste in the container storage units. A summary of equipment capacities, as required by
- 6 20.4.1.500 NMAC is included in Table A1-2.

7 TRUPACT-II Type B Packaging

- The TRUPACT-II (Figure <u>M-17A1-8a</u>) is a cylindrical shipping container 8 ft (2.4 m) in diameter
 and 10 ft (3 m) high. It meets is an NRC-certified Type B shipping containerpackage designed to
 meet the applicable requirements of 10 CFR Part 71 and has successfully completed rigorous
 container-integrity tests. The payload consists of approximately 7,265 lbs-pounds (lb) (3,300
 <u>kilogram (kg)</u>) gross weight in up to fourteen 55-gal (208-L) drums, eight 85-gal (322-L) drums,
 six 100-gal (379-L) drums, two SWBs, or one TDOP.
- 14 HalfPACT Type B Packaging
- 15 The HalfPACT (Figure <u>M-18A1-8b</u>) is a right cylindrical shipping container 8 ft (2.4 m) in
- diameter and 7.6 ft (2.3 m) high. It meets is an NRC-certified Type B shipping containerpackage
- 17 designed to meet the applicable requirements of 10 CFR Part 71 and has successfully
- completed rigorous container-integrity tests. The payload consists of approximately 7,600 lbs-lb
- 19 (3,500 kg) gross weight in up to seven 55-gal (208-L) drums, one SWB, or four 85-gallon gal
- 20 (322-L) drums, or three shielded containers.

21 TRUPACT-III Type B Packaging

- ²² The TRUPACT-III (Figure <u>M-19</u>A1-33) is an NRC-certified Type B package designed to meet
- the containment and shieldingapplicable requirements of 10 CFR Part 71. The nominal

dimensions for a TRUPACT-III are 14 feet 1 inch long, 8 feet 2 inches wide and 8 feet 8 inches

²⁵ high. The TRUPACT-III is specifically certified to safely transport TRU wastes packaged in an

- 26 SLB2.
- This package, unlike the TRUPACT-II or HalfPACT, is horizontally loaded and will beis unloaded horizontally as well.
- ²⁹ The TRUPACT-III has a bolted overpack cover that is secured to the TRUPACT-III container.
- ³⁰ The maximum weight of a TRUPACT-III is 55,116 lbs-lb (25,000 kg) when loaded with the
- maximum allowable contents of 11,486 lbs-lb(5,210 kg).

32 Unloading Docks

- 33 Each TRUDOCK is designed to accommodate up to two Contact-Handled PackagesCH
- 34 <u>packages</u>. The TRUDOCK functions as a work platform, providing TRU mixed waste handling
- ³⁵ personnel easy access to the container during unloading operations (see Figure <u>M-12A1-1a</u>)
- 36 (Also see Drawing 41-M-001-W in Appendix D3 of the WIPP RCRA Part B Permit Application
- 37 (DOE, 1997a)).

- The payload Payload transfer Transfer station Station serves as the unloading dock for 1
- 2 TRUPACT-III and can accommodate a single TRUPACT-III package (see Figure M-20).

Forklifts 3

- Forklifts may be used to transfer the Contact-Handled PackagesCH packages into the WHB 4
- Unit and may be used to transfer palletized CH TRU mixed waste containers to the facility 5
- Facility transfer Transfer vehicle Vehicle. Another forklift will beis used for general-purpose 6
- transfer operations. This forklift has attachments and adapters to handle individual TRU mixed 7
- waste containers, if required. 8

Cranes, Unloading Devices, and Adjustable Center-of-Gravity-Lift Fixtures 9

- At each TRUDOCK, an overhead bridge crane is used with a specially designed lift fixture for 10
- disassembly removing the lids and contents of the Contact-Handled Packages CH packages. 11
- Separate lifting attachments have been specifically designed to accommodate SWBs and 12
- TDOPs. The lift fixture, attached to the crane, has built in level indicators and two 13
- counterweights that can be moved to adjust the center of gravity of unbalanced loads and to 14
- keep them level. 15
- The TRUPACT-III is unloaded horizontally in Room 108. The Payload Transfer Station, Yard 16
- Transfer Vehicle, and Facility Transfer Vehicle, or forklift are used to perform the unloading and 17 movement functions. The Payload Transfer Station includes retractable arms that are used to
- 18
- position the SLB2 onto the Facility Transfer Vehicle and facility pallet. 19

20 Facility or Containment Pallets

- The facility pallet is a fabricated steel unit designed to support 7 seven-packs, 4 four-packs, or 21
- 3three-packs of drums, SWBs, TDOPs, or an SLB2, or shielded container assemblies and has a 22
- rated load of 25,000 lbs. (11,430 kg). The facility pallet will can accommodate up to four 7seven-23
- packs, four 3three-packs, or four 4four-packs of drums:, four SWBs (in two stacks of two units); 24
- two TDOPs;, or an<u>one</u> SLB2; or two shielded container three-pack assemblies. Loads are 25
- secured to the facility pallet during transport to the emplacement area. Facility pallets are shown 26
- in Figure M-21A1-10. Fork pockets in the side of the pallet allow the facility pallet to be lifted and 27
- transferred by forklift to prevent direct contact between TRU mixed waste containers and forklift 28
- tines. This arrangement reduces the potential for puncture accidents. Facility pallets may also 29
- be moved by facility transfer vehicles. WIPP facility operational documents define the 30
- operational load of the facility pallet to ensure that the rated load of a facility pallet is not 31
- exceeded. 32
- Containment pallets are fabricated units having a containment capacity of at least ten percent of 33
- the volume of the containers and designed to support a minimum of either a single drum, a 34
- single SWB or a single TDOP. The pallets will have a rated load capacity of equal to or greater 35
- than the gross weight limit of the container(s) to be supported on the pallet. Loads are secured 36
- to the containment pallet during transport. A typical containment pallet is shown in Figure M-37
- 22A1-10a. Fork pockets in the side of the pallet allow the containment pallet to be lifted and 38
- transferred by forklift. WIPP facility operational documents define the operational load of the 39
- containment pallet to assure that the rated load of a containment pallet is not exceeded. 40

1 Facility Transfer Vehicle

- 2 The facility Facility transfer Transfer vehicle Vehicle is an electric battery or electric powered
- automated vehicle that either operates on tracks or has with an on-board guidance system that
- allows the vehicle to operate on the floor of the WHB. <u>It has a feature that allows it to lower</u>
- 5 integrated rail wheels so that it can operate on the Waste Hoist tracks. It is designed with a flat
- 6 bed that has adjustable height capability and that may be used to transfer waste payloads
- 7 <u>placed</u> on facility pallets <u>on</u> or off the facility pallet stands in the CH Bay storage area, and on
- 8 and off <u>or the waste-Waste shaft Shaft conveyance Conveyance</u> by raising and lowering the bed
- 9 (see Figure <u>M-23</u>A1-11).

10 Yard Transfer Vehicle

- 11 The Yard Transfer Vehicle (Figure M-24A1-35) is an electric battery-powered vehicle that
- transports the TRUPACT-III shipping container from the PAU into the WHB and into Room 108.

13 The Yard Transfer Vehicle is an electric vehicle with a load capacity of 60,000 pounds.

14 RH TRU Mixed Waste

- 15 The RH TRU mixed waste is handled and stored in the RH Complex of the WHB Unit which
- comprises the following locations: RH Bay (12,552 ft² (1,166 m²)), the Cask Unloading Room

17 $(382 \text{ ft}^2 (36 \text{ m}^2))$, the Hot Cell $(1,841 \text{ ft}^2 (171 \text{ m}^2))$, the Transfer Cell $(1,003 \text{ ft}^2 (93 \text{ m}^2))$ (Figures

¹⁸ <u>M-1 and M-13 through M-15</u>A1-17a, b and c), and the Facility Cask Loading Room $(1,625 \text{ ft}^2)$

- 19 (151 m²)) (Figure M-16A1-17d). The maximum storage capacities of each of these locations are
- 20 prescribed in Permit Part 3, Table 3.1.1.
- 21 The RH Bay (Figure <u>M-13</u>A1-14a) is a high-bay area for receiving casks and subsequent
- handling operations. The trailer carrying the RH-TRU 72-B or CNS 10-160B shipping cask

23 (Figures <u>M-25 through M-28A1-18, A1-19, A1-20 and A1-21</u>) enters the RH Bay through a set of

- double doors on the east side of the WHB. The RH Bay houses the Cask Transfer Car. The RH
- Bay is served by the RH Bay Overhead Bridge Crane used for cask handling and maintenance
- operations. Storage in the RH Bay occurs in the RH-TRU 72-B or CNS 10-160B casks. The storage occurs after the trailer containing the cask is moved into the RH Bay and prior to moving
- the cask into the Cask Unloading Room to stage the waste for disposal operations. A maximum
- ²⁹ of two loaded casks and one 55-gallon drum for derived waste (156 ft³ (4.4 m³)) may be stored
- 30 in the RH Bay.
- The Cask Unloading Room (Figure $\underline{M-13}A1-17a$) provides for transfer of the RH-TRU 72-B cask

to the Transfer Cell, or the transfer of drums from the CNS 10-160B cask to the Hot Cell.

33 Storage in the Cask Unloading Room will occur<u>occurs</u> in the RH-TRU 72-B or CNS 10-160B

casks. Storage in this area typically occurs to facilitate operations during a shift, at the end of a

- shift, or in an off-normal event that results in the suspension of waste handling operations. A maximum of one cask (74 ft³ (2.1 m³)) may be stored in the Cask Unloading Room.
- ³⁷ The Hot Cell (Figure <u>M-14A1-17b</u>) is a concrete shielded room in which drums of RH TRU
- mixed waste will be are transferred remotely from the CNS 10-160B cask, staged in the Hot Cell,

and loaded into a Facility Canister. The loaded Facility Canister is then lowered from the Hot

Cell into the Transfer Cell Shuttle Car containing a Shielded Insert. Storage in the Hot Cell

- occurs in either drums or Facility Canisters. Drums that are stored are either on the drum
- carriage unit that was removed from the CNS 10-160B cask or in a Facility Canisters. A

maximum of 12 55-gallon drums and one 55-gallon drum for derived waste (94.9 ft³ (2.7 m³)) may be stored in the Hot Cell.

- 3 The Transfer Cell (Figure <u>M-15A1-17c</u>) houses the Transfer Cell Shuttle Car, which moves the
- 4 RH-TRU 72-B cask or Shielded Insert into position for transferring the canister to the Facility
- 5 Cask. Storage in this area typically occurs to facilitate operations during a shift, at the end of a
- 6 shift, or in an off-normal event that results in the suspension of a waste handling evolution. A
- 7 maximum of one canister (31.4 ft³ (0.89 m³)) may be stored in the Transfer Cell in the Transfer
- 8 Cell Shuttle Car.
- 9 The Facility Cask Loading Room (Figure <u>M-16A1-17d</u>) provides for transfer of a canister to the
- 10 Facility Cask (Figure M-29) for subsequent transfer to the waste Waste Shaft Shaft conveyance
- 11 <u>Conveyance</u> and to the <u>Uu</u>nderground Hazardous Waste Disposal Unit (**HWDU**). The Facility
- 12 Cask Loading Room also functions as an air lock between the Waste Shaft and the Transfer
- 13 Cell. Storage in this area typically occurs to facilitate operations during a shift, at the end of a
- shift_{*} or in an off-normal event that results in the suspension of waste handling operations. A
- ¹⁵ maximum of one canister (31.4 ft³ (0.89 m³)) may be stored in the Facility Cask (Figure A1-23)
- 16 in the Facility Cask Loading Room.
- Following is a description of major pieces of equipment that are used to manage RH TRU mixed
- 18 waste in the WHB Unit. A summary of equipment capacities, as required by 20.4.1.500 NMAC,
- 19 is included in Table A1-3.
- 20 <u>Casks</u>
- ²¹ The RH-TRU 72-B cask (Figure <u>M-27</u>A1-20) is a cylinder cylindrical designed to meet U.S.
- 22 Department of Transportation (DOT) <u>NRC-certified</u> Type B shipping container<u>package designed</u>
- 23 <u>to meet the applicable</u> requirements <u>of 10 CFR Part 71</u>. It consists of a separate Inner
- 24 Containment Vessel (ICV)inner vessel within a stainless steel, lead-shielded outer cask
- protected by impact limiters at each end, made of stainless steelstainless-steel skins filled with
- polyurethane foam. The ICV inner vessel is made of stainless steel and provides an internal
- containment boundary and a cavity for the payload. Neither the outer cask nor the ICV-inner
- <u>vessel</u> is vented. Payload capacity of each RH-TRU 72-B shipping cask is 8,000 lbs (3,628 kg).
 The payload consists of a canister of RH TRU mixed waste, which may contain up to 31.4 ft³
- The payload consists of a canister of RH TRU mixed waste, which may ((0.89 m³) of directly loaded waste or waste in smaller containers.
- The CNS 10-160B cask (Figure M-28A1-21) is designed to meet DOTan NRC-certified Type B
- ³² container-package designed to meet the applicable requirements of 10 CFR Part 71, and It
- consists of two carbon steel shells and a lead shield, welded to a carbon steel bottom plate. A
- 12-gauge stainless steel thermal shield surrounds the cask outer shell, which is equipped with
- two steel-encased, rigid polyurethane foam impact limiters attached to the top and bottom of the
- cask. The CNS 10-160B cask is not vented. Payload capacity of each CNS 10-160B cask is
- 14,500 lbs (6,577 kg). The payload consists of up to ten 55-gallon gal (208-L) drums.
- 38 Shielded Insert
- ³⁹ The Shielded Insert (Figure <u>M-30</u>A1-30) is specifically designed to be used in the Transfer Cell
- to hold and transport loaded Facility Canisters from the Hot Cell until loaded into the Facility
- 41 Cask. The Shielded Insert, designed and constructed similar to the RH-TRU 72-B shipping
- cask, has a 29 in. inside diameter with an inside length of 130.5 in. <u>(331.5 cm)</u> to accommodate

- 1 the Facility Canister, which is 28.5 in. in diameter by 117.5 in. long. The Shielded Insert is
- installed on and removed from the Transfer Cell Shuttle Car in the same manner as the RH-
- 3 TRU 72-B shipping cask.

4 CNS 10-160B Drum Carriage

The CNS 10-160B drum carriage (Figure <u>M-31</u>A1-25) is a steel device used to handle drums in the CNS 10-160B cask. The drum carriages are stacked two high in the CNS 10-160B cask during shipment. They are removed from the cask using a below-the-hook lifting device termed a pentapod. The drum carriage is rated to lift up to five drums-with a maximum weight of 1000 pounds each.

10 RH Bay Overhead Bridge Crane

In the RH Bay, an overhead bridge crane is used to lift the cask from the trailer and place it on
 the Cask Transfer Car. It is also used to remove the impact limiters from the casks and <u>may be</u>
 <u>used to remove</u> the outer lid of the RH-TRU 72-B cask.

14 Cask Lifting Yoke

The lifting yoke is a lifting fixture that attaches to the RH Bay Overhead Bridge Crane and is designed to lift and rotate the RH-TRU 72-B cask onto the Cask Transfer Car.

17 Cask Transfer Cars

The Cask Transfer Cars (Figures M-32A1-22a and M-33A1-22b) are self-propelled, rail-guided vehicles that transport casks between the RH Bay and the Cask Unloading Room.

20 6.25 Ton Grapple Hoist

A 6.25 Ton Grapple Hoist is used to hoist the canister from the Transfer Cell Shuttle Car into the Facility Cask.

23 Facility Canister

- 24 The Facility Canister is a cylindrical container designed to hold three 55-gallon-gal (208-L)
- ²⁵ drums of either RH TRU waste or dunnage (Figure <u>M-9A1-16</u>).

26 Facility Cask

- 27 The Facility Cask, or Light Weight Facility Cask, body consists of two concentric steel cylinders.
- The annulus between the cylinders is filled with lead, and gate shield valves are located at
- either end. Figure <u>M-29</u>A1-23 provides an outline configuration of the Facility Cask. The canister
- ³⁰ is placed inside the Facility Cask for shielding during canister transfer from the RH Complex to
- the Uunderground HWDU for emplacement.
- 32 Facility Cask Transfer Car
- ³³ The Facility Cask Transfer Car (Figure <u>M-34A1-24</u>) is a self-propelled rail car that is used to
- ³⁴ move the Facility Cask between the Facility Cask Loading Room and the Shaft Station in the
- 35 underground.

1 Hot Cell Bridge Crane

2 The Hot Cell Bridge Crane, outfitted with a rotating block and the Hot Cell Facility Grapple, will

3 beis used to lift the CNS 10-160B lid and the drum carriage units from the cask located in the

4 Cask Unloading Room, into the Hot Cell. The Hot Cell Bridge Crane is also used to lift the

⁵ empty Facility Canisters into place within the Hot Cell, move loaded drums into the Facility

6 Canister, and lower loaded Facility Canisters into the Transfer Cell.

7 Overhead Powered Manipulator

The Overhead Powered Manipulator is used in the Hot Cell to lift individual drums from the drum
 carriage unit and lower each drum into the Facility Canister and support miscellaneous Hot Cell
 operations.

11 Manipulators

12 There is a maximum of two operational sets of fixed Manipulators in the Hot Cell. The

13 Manipulators <u>are used to collect</u> swipes of drums as they are being lifted from the drum carriage

unit, and transfer the swipes to the Shielded Material Transfer Drawer for pertinent analysis, and

15 support Hot Cell operations.

16 Shielded Material Transfer Drawer

17 The Shielded Material Transfer Drawer is used to transfer swipe samples obtained by the fixed

18 Manipulators to the Hot Cell Gallery for radiological counting and transferring small equipment 19 into and out of the Hot Cell.

¹⁹ into and out of the Hot Cell.

20 Closed-Circuit Television Cameras

21 The Closed-Circuit Television Camera system is used to monitor operations throughout the Hot

22 Cell and Transfer Cell. These cameras are used to perform inspections of waste containers and

waste management areas. This camera system is operated from the shielded room in the

Facility Cask Loading Room, <u>Cask Unloading Room</u>, and Hot Cell Gallery. The camera system

has a video recording capability as an operational aid.

26 Transfer Cell Shuttle Car

The Transfer Cell Shuttle Car (Figure <u>M-35</u>A1-31) positions the loaded RH-TRU 72-B cask and Shielded Insert within the Transfer Cell.

29 Cask Unloading Room Crane

30 The Cask Unloading Room Crane lifts and suspends the RH-TRU 72-B cask or Shielded Insert

from the Transfer Car and lowers the cask or Shielded Insert into the Transfer Cell Shuttle Car.

- 32 Facility Cask Rotating Device
- ³³ The Facility Cask Rotating Device, a floor mounted hydraulically operated structure, is designed

to rotate the Facility Cask from the horizontal position to the vertical position for waste canister

loading and then back to the horizontal position after the waste canister has been loaded into

the Facility Cask (Figure <u>M-36</u>A1-32).

1 A1-1c(2) Parking Area Container Storage Unit (Parking Area UnitPAU)

The parking area south of the WHB (see Figure M-2A1-2) will be subset of waste 2 containers within sealed shipping containers awaiting unloading. The area extending south from 3 the WHB within the security-fenced enclosure identified as the Controlled Area on Figure A1-2 4 is defined as the Parking Area UnitPAU. The Parking Area UnitPAU provides storage space for 5 up to 6,734 ft³ (191 m³) of TRU mixed waste, contained in up to 40 loaded Contact-Handled 6 PackagesCH packages and 8-eight Remote Handled PackagesRH packages. Secondary 7 containment and protection of the waste containers from standing liquid are provided by the 8 Contact-Handled or Remote-Handled PackagingCH or RH packaging. Wastes placed in the 9 Parking Area UnitPAU will-remain sealed in their Contact-Handled or Remote-Handled 10 PackagesCH or RH packages, at all times while in this area. 11 The Nuclear Regulatory Commission (NRC)NRC Certificate of Compliance requires that sealed 12

- 13 Contact-Handled or Remote-Handled Packages<u>CH or RH packages</u> which containcontaining
- 14 waste be vented every 60 days to avoid unacceptable levels of internal pressure. During normal
- 15 operations the maximum residence time of any one container in the Parking Area Unit is
- 16 typically five days. Therefore, during normal waste handling operations, no Contact-Handled or
- 17 Remote-Handled Packages will require venting while located in the Parking Area Unit. Any off-
- normal event which results in the need to store a waste container in the Parking Area UnitPAU
- 19 for a period of time approaching fifty-nine (59) days shall be handled in accordance with Section
- A1-1e(2) of this Permit Attachment. Under no circumstances shall a Contact-Handled or
- 21 Remote-Handled Package<u>CH or RH package</u> be stored in the Parking Area Unit<u>PAU</u> for more
- than fifty-nine (59) days after the date that the ICV of the Contact-Handled or Remote-Handled
- Package<u>CH or RH package</u> was sealed at the generator site, as recorded in the ICV Closure
- 24 <u>Date field of the WIPP Waste Information System (**WWIS**) database.</u>
- 25 Parking Area Unit Surge Storage Area
- 26 The Permittees will-coordinate shipments with the generator/storage sites in an attempt to
- 27 minimize the use of surge storage. However, there may be circumstances causing shipments to
- arrive that would exceed the maximum capacity of the Parking AreaPAU, as specified in Permit
- 29 Part 3, Table 3.1.2, Parking Area Unit. The Permittees may use the Parking AreaPAU Surge
- 30 Storage <u>Area</u> as specified in <u>Permit</u> Part 3, <u>Section 3.1.2.3</u> (see Figure <u>M-2A1-2</u>) only when the
- 31 maximum capacity in the Parking AreaPAU is reached and at least one of the following
- 32 conditions is met:
- Surface or underground waste handling equipment malfunctions prevent the 33 Permittees from moving waste to disposal locations; 34 Hoisting or underground ventilation equipment malfunctions prevent the Permittees • 35 from moving waste into the underground; 36 Power outages cause a suspension of waste emplacement activities: 37 Inbound shipment delays are imminent because the Parking AreaPAU is full (not 38 • applicable to RH TRU waste shipments); or 39 Onsite or offsite emergencies cause a suspension of waste emplacement activities. 40

- 1 The Permittees must notify NMED and those on the e-mail notification list (as specified in Permit
- 2 Part 1, Sections 1.11, and Permit Part 3, Section 3.1.2.4) upon using the Parking AreaPAU
- 3 Surge Storage <u>Area</u> and provide justification for its use.

4 A1-1d Container Management Practices

5 20.4.1.500 NMAC (incorporating 40 CFR §264.173) requires that containers be managed in a

manner that does not result in spills or leaks. Containers are required to be closed at all times,
 unless waste is being placed in the container or removed. Because containers at the WIPP

a facility will contain radioactive waste, safety concerns require that containers be continuously

yented to obviate prevent the buildup of gases within the container. These gases could result

10 from radiolysis, which is the breakdown of moisture by radiation. The vents, which are nominally

- 11 0.75 in. (1.9 centimeters [cm]) in diameter, are generally installed on or near the lids of the
- containers. These vents are filtered so that gas can escape while <u>radioactive</u> particulates are retained.
- 14 TRU mixed waste containers, containing off-site waste, are never opened at the WIPP facility.
- ¹⁵ Derived waste containers are kept closed at all times unless waste is being added or removed.

16 Off-normal (unplanned) events could interrupt normal operations in the waste management

17 process line. Shipments of waste from the generator sites will be stopped in an off-normal event

18 which results in an interruption to normal waste handling operations that exceeds three days

and could potentially cause the maximum permitted storage capacities and/or time limits to be

20 <u>exceeded.</u> These off_normal events <u>typically</u> fall into the following categories:

- Waste management system equipment malfunctions <u>that prevent unloading or</u>
 <u>downloading waste to the underground</u>
 Waste shipments with unacceptable levels of surface contamination that prevent
 - Waste shipments with unacceptable levels of surface contamination <u>that prevent</u> <u>unloading or downloading waste to the underground</u>
- Hazardous Waste Manifest discrepancies that are not immediately resolved <u>and</u>
 prevent unloading or downloading waste to the underground
- A suspension of emplacement activities for regulatory reasons
- 28 Shipments of waste from the generator sites will be stopped in any event which results in an
- ²⁹ interruption to normal waste handling operations that exceeds three days.
- ³⁰ Prior to receipt of TRU mixed waste at the WIPP facility, waste operators will be thoroughly
- trained in the safe use of TRU mixed waste handling and transport equipment. The training will

³² include both classroom training and on-the-job training.

33 A1-1d(1) Derived Waste

24

- 34 The WIPP facility operational philosophy is to introduce no new hazardous chemical
- components into TRU mixed waste or TRU mixed waste residues that could be present in the
- 36 controlled area. This will beis accomplished principally through written procedures and the use
- of Safe Work Permits (SWP)¹ and Radiological Work Permits (RWP)² which govern the

¹ SWPs are prepared to assure that any hazardous work (not already covered by a procedure) is performed with due precaution. SWPs are issued by the Permittees after a job supervisor completes the proper form detailing the job location, work description,

activities within a controlled area involving TRU mixed waste. The purpose of this operating

- 2 philosophy is to avoid generating TRU mixed waste that is compositionally different than the
- 3 TRU mixed waste shipped to the WIPP facility for disposal.

4 Some additional TRU mixed waste, such as used personal protective equipment, swipes, and

tools, may result from decontamination operations and off-normal events. Such waste will be

assumed to be contaminated with RCRA-regulated hazardous constituents in the TRU mixed

7 waste containers from which it was derived. Derived waste may be generated as the result of

- 8 decontamination activities during the waste handling process. Should <u>radiological</u>
- 9 decontamination activities be performed, the work will be conducted consistent with radiological
- 10 control procedures pursuant to 10 CFR Part 835. For decontamination of hazardous waste
- 11 <u>constituents</u>, water and a cleaning agent such as those listed in Permit Attachment D will be
- used. Derived waste will be considered acceptable for management at the WIPP facility,
 because any TRU mixed waste shipped to the facility will have already been determined to be
- because any TRU mixed waste shipped to the facility will have already been determined to acceptable and because no new <u>hazardous waste</u> constituents will be added. Data on the

acceptable and because no new <u>hazardous waste</u> constituents will be added. Data on the
 derived waste will be entered into the WWIS database. Derived waste will be contained in

16 standard DOT approved Type A containers.

17 The Safety Analysis Report (DOE 1997b) for packaging requires the lids of TRU mixed waste

18 containers to be vented through high efficiency particulate air (HEPA) grade filters to preclude

19 container pressurization caused by gas generation and to prevent particulate material from

20 escaping. Filtered vents used in CH TRU mixed waste containers (55-gal (208-L) drums, 85-gal

21 (322 L) drums, 100-gal (379-L) drums, TDOPs, and SWBs) have an orifice approximately 0.375-

in. (9.53-millimeters) in diameter through which internally generated gas may pass. The filter

²³ media can be any material (e.g., composite carbon, sintered metal).

As each derived waste container is filled, it will beis closed with a lid containing a high efficiency

²⁵ <u>particulate air (</u>HEPA)-grade- filter and moved to an Uunderground Hazardous Waste Disposal

²⁶ Unit (**HWDU**)<u>HWDU</u> using the same equipment used for handling TRU mixed waste.

27 A1-1d(2) CH TRU Mixed Waste Handling

CH-Contact-handled TRU mixed waste containers will-arrive by tractor-trailer at the WIPP facility 28 29 in sealed shipping containers (e.g., TRUPACT-IIs, HalfPACTs, or TRUPACT-IIIs) (see Figure M-37A1-12). Prior to unloading the packages from the trailer, they will-undergo security and 30 radiological checks and shipping documentation reviews. A forklift will-removes the Contact-31 Handled PackagesCH packages which will beare transported by forklift or Yard Transfer Vehicle 32 through an air lock that is designed to maintain differential pressure in the WHB. The forklift will 33 places the shipping containers at either one of the two TRUDOCKs in the TRUDOCK Storage 34 Area of the WHB Unit or the Yard Transfer Vehicle will-locates the TRUPACT-III at the bolting 35 station in Room 108. An external survey of the Contact-Handled PackageCH package Inner 36 Containment Vessel (ICV) lid -(Figure M-17A1-8a and M-18A1-8b) will be s performed as the 37

personnel involved, specific hazards involved, and protective requirements. The Permittees review the form, check on the adequacy of the protective measures, and if sufficient, approve the work permit. Conditions of the SWPs must be met while any hazardous work is proceeding. Examples of activities covered by the SWP program include confined space entry, overhead work, and work on energized equipment.

² RWPs are used to control entry into and performance of work within a controlled area (**CA**). Managers responsible for work within a CA must generate a work permit that specifies the work scope, limiting conditions, dosimetry, respiratory protection, protective clothing, specific worker qualifications, and radiation safety technician support. RWPs are approved by the Permittees after thorough review. No work can proceed in a CA without a valid RWP.

1 Outer Confinement Vessel (**OCV**) lid is removed. The ICV lid or closure lid will beis lifted under

the Vent Hood System (VHS), and the contents will beare surveyed during and after this

³ process is complete. The VHS³ is attached to the Contact-Handled Package<u>CH package</u> to

4 provide atmospheric control and confinement of headspace gases at their source. It also

5 prevents potential personnel exposure and facility contamination due to the spread of

⁶ radiologically contaminated airborne dust particles and minimizes personnel exposure to VOCs.

7 Contamination surveys at the WIPP facility are based in part on radiological surveys used to

8 indicate potential releases of hazardous constituents from containers by virtue of detection of

⁹ radioactive contamination (see Permit Attachment G3). Radiological surveys may be applicable

to most hazardous constituent releases except the release of gaseous VOCs from TRU mixed

11 waste containers. Radiological surveys provide the WIPP facility with a very sensitive method of

indicating the potential release of nongaseous hazardous constituents through the use of

surface sampling (swipes) and radioactivity counting. Radiological surveys are used in addition

to the more conventional techniques such as visual inspection to identify spills.

¹⁵ Under normal operations, it is not expected that the waste containers will be externally

16 contaminated pursuant to 10 CFR Part 835 or that removable surface contamination on the

17 shipping package or the waste containers will be in excess of the DOE's free release limits (i.e.;

< 20 disintegrations per minute (**dpm**)⁴ per 100 cm² alpha or < 200 dpm per 100 cm²

19 beta/gamma). In such a case, no further decontamination action is needed. The shipping

20 package and waste container will be handled through the normal process. However, should the

21 magnitude of there be contamination in excess exceed the free release of the radiological control

limits pursuant to 10 CFR Part 835, yet still fall within the criteria for small area "spot"

decontamination (i.e., less than or equal to 100 times the free release limit and less than or

equal to 6 ft² [0.56 m²]), the shipping package or the waste container will be

25 decontaminated managed in accordance with radiological control procedures pursuant to 10

26 <u>CFR Part 835</u>. Decontamination activities will not be conducted on containers which that are not

²⁷ in good condition, or containers which are leaking. Containers which that are not in good

condition, and containers which that are leaking, will be overpacked (if applicable) in an

- approved container, repaired/patched in accordance with 49 CFR § 173 and §178 (e.g., 49 CFR
- 30 <u>§173.28</u>), orappropriate standards and guidance (e.g., 49 CFR §173.28), returned to the
- 31 generator, or sent to a third-party contractor. In addition, if during the waste handling process at
- the WIPP facility, a waste container is breached, it will be overpacked (if applicable) in an
- approved container, repaired/patched in accordance with 49 CFR §173 and §178 (e.g., 49 CFR
- ³⁴ §173.28), or returned to the generatorappropriate standards and guidance (e.g., 49 CFR)

³ The TRU mixed waste container headspace may contain radiologically contaminated airborne dust particles.

^{1.} Without the VHS, a potential mechanism will exist to spread contamination (if present) in the immediate CH TRU mixed waste handling area, because lid removal will immediately expose headspace gases to prevailing air currents induced by the building ventilation system.

^{2.} With the VHS, a confined and controlled set of prevailing air currents will be induced by the system blower. The VHS will function as a local exhaust system to effectively control radiologically contaminated airborne dust particles (and VOCs) at essentially atmospheric pressure conditions.

Functionally, the VHS will draw the TRU mixed waste container headspace gases, convey them through a HEPA filter, and ultimately duct them through the WHB exhaust ventilation system. VOCs will pass through the HEPA filter and will be conveyed to the ventilation exhaust duct system. The system principally consists of a functional aggregation of 1) vent hood assembly, 2) HEPA filter assemblies (to capture any airborne radioactive particles), 3) blower (to provide forced airflow), 4) ductwork, and 5) flexible hose.

⁴ The unit "dpm" stands for "disintegration per minute" and is the rate of emission by radioactive material as determined by correcting the counts per minute observed by an appropriate detector for background, efficiency, and geometric factors associated with the instrumentation.

- 1 §173.28), or managed in accordance with radiological control procedures pursuant to 10 CFR
- 2 Part 835. The overpacked or repaired container will be labeled and emplaced in an underground
- 3 <u>HWDU for disposal.</u> Should WIPP <u>facility</u> structures or equipment become contaminated, waste
- 4 handling operations in the affected area will be immediately suspended managed in accordance
- 5 with standard operating procedures, and the contaminated structures or equipment will be
- 6 managed consistent with radiological control procedures pursuant to 10 CFR Part 835.
- 7 <u>Hazardous waste decontamination</u> activities will use water and cleaning agents (see Permit
- 8 Attachment D) so as to not generate any waste that cannot be considered derived waste. Items
- ⁹ that are radiologically contaminated are also assumed to be contaminated with the hazardous
- wastes that are in the container involved in the spill or release. A complete listing of these waste
- 11 components can be obtained from the WIPP Waste Information System (WWIS)<u>WWIS</u>, as
- described in Permit Attachment C, for the purpose of characterizing derived waste.
- 13 It is assumed that the process of <u>localized surface</u> decontamination will remove the hazardous
- 14 waste constituents along with the radioactive waste constituents. <u>Therefore, waste containers</u>
- 15 will be emplaced in the underground HWDUs without further action once localized radiological
- 16 <u>contamination is removed unless there is visible evidence of hazardous waste spills or</u>
- 17 hazardous waste on the container. Hazardous waste decontamination will be conducted, if
- 18 necessary, in accordance with the requirements of the Permit and the standards of 20.4.1.500
- 19 <u>NMAC (incorporating 40 CFR Part 264).</u>To provide verification of the effectiveness of the
- 20 removal of hazardous waste constituents, once a contaminated surface is demonstrated to be
- radiologically clean, the "swipe" will be sent for analysis for hazardous constituents. The use of
- 22 these confirmation analyses is as follows:
- ²³ **For waste containers**, the analyses becomes documentation of the condition of the container
- 24 at the time of emplacement. The presence of hazardous waste constituents on a container after
- decontamination will be at trace levels and will likely not be visible and will not pose a threat to
- ²⁶ human health or the environment. These containers will be placed in the underground without
- 27 further action once the radiological contamination is removed unless there is visible evidence of 28 hazardous waste spills or hazardous waste on the container and this contamination is
- ²⁹ considered likely to be released prior to emplacement in the underground.
- ³⁰ **For area contamination**, In the event of area contamination, a radiological boundary will be
- established in accordance with radiological control procedures. Inside this boundary, cleanup
- 32 activities are controlled with protocols for the cleanup of spills and releases. As dictated by
- cleanup protocols, decontamination will be managed consistent with radiological control
- procedures pursuant to 10 CFR Part 835. once Once the area is cleaned up and is shown to be
- radiologically clean, it will be sampled for the presence of hazardous waste residues. <u>Hazardous</u>
- 36 waste decontamination will be conducted in accordance with the requirements of the Permit and
- 37 the standards of 20.4.1.500 NMAC (incorporating 40 CFR Part 264). If the area is large, aA
- sampling plan will be developed, as needed, which incorporates the guidance of EPA's-SW-846
- 39 (EPA, 2015) in selecting random samples over large areas. Selection of constituents for
- sampling analysis will be based on information (in the WWIS) about the waste that was spilled
- and information on cleanup procedures. If the area is small, swipes will be used. If the results of
- the analysis show that residual contamination remains, a decision will be made whether further
- 43 cleaning will be beneficial or whether final clean up<u>clean-up</u> shall <u>will</u> be deferred until closure.
- For example, if hazardous constituents react with the floor coating and are essentially
 nonremovable without removing the coating, then clean up will be deferred until closure when
- 45 the coatings will be stripped. In any case, appropriate Appropriate notations will be entered into

- the operating <u>Operating record Record</u> to assure proper consideration of formerly contaminated
- areas at the time of closure. Furthermore, measures such as covering, barricading, and/or
- ³ placarding will be used as needed to mark areas that remain contaminated.
- 4 Small area decontamination, if needed, will occur in the area in which it is detected for
- 5 contamination that is less than 6 ft² (0.56 m²) in area and is less than 100 times the free release
- 6 limit. The free release limit is defined by DOE Orders as alpha contamination less than 20
- 7 dpm/100 cm² and beta-gamma contamination less than 200 dpm/100 cm². Overpacking would
- 8 occur in the event the WIPP staff damages an otherwise intact container during handling
- 9 activities. In such a case, a radiological boundary will be established, inside which all activities
- 10 are carefully controlled in accordance with the protocols for the cleanup of spills or releases. A
- 11 plan of recovery will be developed and executed, including overpacking or repairing the
- damaged container. The overpacked or repaired container will be properly labeled and sent
- 13 underground for disposal. The area will then be decontaminated and verified to be free of
- 14 contamination using both radiological and hazardous waste sampling techniques (essentially,
- this is done with "swipes" of the surface for counting in sensitive radiation detection equipment
 or, if no radioactivity is present, by analysis for hazardous waste by an offsite laboratory).
- 17 In the event a large<u>that extensive</u> area contamination is discovered within a Contact-Handled
- 18 Package<u>CH package</u> during unloading, the waste will be left in the Contact-Handled

¹⁹ Package CH package and the shipping container will be resealed. The DOE considers such

20 contamination problems the responsibility of the shipping site. Therefore, the shipper will have

several options for disposition. These are as follows<u>the shipping package will be dispositioned</u>

- 22 according to the following options:
- The Contact-Handled<u>CH</u> Package can be returned to the shipper for decontamination and repackaging of the waste. Such waste would have to be re-approved prior to shipment to the WIPP.
- Shipment to another DOE site for management in the event the original shipper does
 not have suitable facilities for decontamination. If the repairing site wishes to return the
 waste to WIPP, the site will have to meet the characterization requirements of the
 Waste Analysis PlanWAP.
- The waste could go to a third (non-DOE) party for decontamination. In such cases, the repaired shipment would go to the original shipper and be recertified prior to shipment to the WIPP.
- Written procedures specify materials, protocols, and steps needed to put an object into a safe
 configuration for decontamination of surfaces. A RWP will always be prepared prior to
 decontamination activities. TRU mixed waste products from decontamination will be managed
 as derived waste.⁵ and in accordance with radiological control and waste handling procedures.

⁵Note that the DOE had previously proposed use of an Overpack and Repair Room to deal with major decontamination and overpacking activities. The DOE has eliminated the need for this area by: 1) limiting the size of contamination events that will be dealt with as described in this section, and 2) by performing overpacking at the point where a need for overpacking is identified instead of moving the waste to another area of the WHB. This strategy minimizes the spread of contamination.

1 The TRUPACT-II may hold up to two 7<u>seven</u>-packs, two 4<u>four</u>-packs, <u>and</u> two 3<u>three</u>-packs<u>of</u>

- 2 <u>drums</u>; two SWBs; or one TDOP. A HalfPACT may hold seven 55-gal (208-L) drums, one
- 3 SWB, <u>three shielded containers, or four 85-gallon gal</u> drums. The TRUPACT-III holds a single
- 4 SLB2. An overhead bridge crane or Facility Transfer Vehicle Payload Transfer Station will beis
- ⁵ used to remove the contents of the Contact-Handled Package<u>CH package</u> and place them on a
- 6 facility pallet. The containers will be visually inspected for physical damage (severe rusting,
- 7 apparent structural defects, signs of pressurization, etc.) and leakage to ensure they are in good
- 8 condition prior to storage. Waste containers will also be checked for external surface
- 9 contamination. If a primary waste container is not in good condition, the Permittees will
- 10 overpack the container, repair/patch the container in accordance with 49 CFR §173 and §178
- 11 (e.g., 49 CFR §173.28), or return the container to the generator.
- For inventory control purposes, TRU mixed waste container identification numbers will beare
- 13 verified against the Uniform Hazardous Waste Manifest and the WWISin accordance with
- ¹⁴ <u>Permit Attachment C, Section C-5b(1)</u>. Inconsistencies will be resolved with the generator

¹⁵ before TRU mixed waste is emplaced. Discrepancies that are not resolved within 15 days will be

- reported to the NMED in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.72).
- 17 Each facility pallet has two recessed pockets to accommodate two sets of 7<u>seven</u>-packs (see
- Figure M-21A1-10), two sets of 4<u>four</u>-packs, two sets of 3<u>three</u>-packs;, or two <u>sets of</u> SWBs
- 19 stacked two-high; two TDOPs; two shielded container assemblies, or three-packs; or any
- 20 combination thereof. Each facility pallet will accommodate one SLB2. Each stack of waste
- 21 containers will beis secured prior to transport underground. A forklift or the facility Facility
- ²² transfer <u>Transfer vehicle Vehicle</u> will transport the loaded facility pallet to the conveyance
- loading room located adjacent to the Waste Shaft. The conveyance loading room serves as an
- air lock between the CH Bay and the Waste Shaft, preventing excessive air flow between the
- two areas. The facility Facility transfer Transfer vehicle Vehicle will be driven onto the waste
- 26 <u>Waste shaft Shaft conveyance Conveyance</u> deck, where the loaded facility pallet will beis 27 transferred to the waste Waste shaft Shaft conveyanceConveyance, and the facility Facility
- transferred to the waste-<u>Waste shaft-Shaft conveyanceConveyance</u>, and the facility-<u>Facility</u>
 transfer Transfer vehicle Vehicle will be backed off. Containers of CH TRU mixed waste (55-
- gal (208-L) drums, SWBs, 85-gal (322-L) drums, 100-gal (379-L) drums, and TDOPs) or
- shielded container assemblies can be handled individually, if needed, using the forklift and lifting
- attachments (i.e., drum handlers, parrot beaks).
- 32 The waste <u>Waste shaft Shaft conveyance Conveyance</u> will lower the loaded facility pallet to the
- 33 Underground HWDUsWaste Shaft Station underground. From there, an underground
- 34 transporter is used to transport the CH TRU mixed waste to the underground HWDU. Figures
- ³⁵ <u>M-38 and M-39 A1-13 is a are</u> flow diagrams of the CH TRU mixed waste handling process.

36 A1-1d(3) RH TRU Mixed Waste Handling

- The RH TRU mixed waste that is not in a shielded container will be received in the RH-TRU 72-
- B cask or CNS 10-160B cask loaded on a trailer, as illustrated in process flow diagrams in
- ³⁹ Figures <u>M-40</u>A1-26 and <u>M-41</u>A1-27, respectively. These are shown schematically in Figures
- 40 A1-28 and A1-29. Remote-Handled handled TRU mixed waste received in shielded containers
- will beis managed and stored as CH TRU mixed waste. Prior to unloading the cask from the
- 42 trailer, external radiological surveys, security checks, shipping documentation reviews are
- $_{43}$ performed_± and the Uniform Hazardous Waste Manifest is signed. The generator's copy of the
- 44 Uniform Hazardous Waste Manifest is returned to the generator. Should the results of the
- 45 contamination survey exceed acceptable levels, the shipping cask and transport trailer remain

- 1 outside the WHB in the Parking Area UnitPAU, and the appropriate radiological boundaries (i.e.,
- 2 ropes, placards) are erected around the shipping cask and transport trailer. A determination will
- 3 be made whether to return the cask to the originating site or to decontaminate the cask.
- 4 Following cask inspections, the shipping cask and trailer are moved into the RH Bay or held in
- 5 the Parking Area Unit<u>PAU</u>. The waste handling process begins in the RH Bay where the impact
- 6 limiter(s) are removed from the shipping cask while it is on the trailer. Additional radiological
- ⁷ surveys are conducted on the end of the cask previously protected by the impact limiter(s) to
- 8 verify the absence of contamination. The cask is unloaded from the trailer using the RH Bay
- 9 Overhead Bridge Crane and placed on a Cask Transfer Car.
- 10 <u>Whenever RH TRU mixed waste is present</u>, <u>Differential differential</u> air pressure between the RH
- 11 TRU mixed waste handling locations in the RH Complex protects workers and prevents
- 12 potential spread of contamination during handling of RH TRU mixed waste. Airflow between key
- rooms in the WHB is controlled by maintaining differential pressures between the rooms. The
- 14 CH Receiving Bay is maintained with a negative pressure relative to outside atmosphere. The
- 15 RH Receiving Bay is maintained with a requirement to be positive pressure relative to the CH
- 16 Receiving Bay. The RH Hot Cell is maintained with a negative differential pressure relative to
- 17 the RH Receiving Bay. The Hot Cell ventilation is exhausted through high-efficiency particulate
- air filters prior to venting through the WHB filtered exhaust.

19 RH-TRU 72-B Cask Unloading

- ²⁰ The Cask Transfer Car then moves the RH-TRU 72-B cask to a work stand in the RH Bay. The
- 21 work stand allows access to the head area of the RH-TRU 72-B cask for conducting radiological
- surveys, performing physical inspections or minor maintenance, and decontamination, if
- necessary. The outer lid bolts on the RH-TRU 72-B cask are removed, and after which the outer
- lid is removed to provide access to the lid of the cask ICV<u>inner vessel</u>. The RH-TRU 72-B cask
- is moved into the Cask Unloading Room by a Cask Transfer Car and is positioned under the
- Cask Unloading Room Bridge Crane. The Cask Unloading Room Bridge Crane attaches to the
- 27 RH-TRU 72-B cask and lifts and suspends the RH-TRU 72-B cask to clear the Cask Transfer
- ²⁸ Car. The <u>suspended</u> RH-TRU 72-B cask is <u>then</u> aligned over the Cask Unloading Room port.
- ²⁹ The Cask Unloading Room shield valve is opened, and the cask is lowered through the port into
- the Transfer Cell Shuttle Car. The Cask Unloading Room Bridge Crane is unhooked and
- retracted, and the Cask Unloading Room shield valve is closed. After the cask is lowered into
- the Transfer Cell Shuttle Car, the bolts on the lid of the cask ICV-inner vessel are loosened by a
- robotic Manipulator. The Transfer Cell Shuttle Car is then aligned directly under the Transfer
- 34 Cell shield valve in preparation for removing the ICV <u>inner-vessel</u> lid and transferring the
- canister to the Facility Cask. Operations in the Transfer Cell are monitored by closed-circuit
- 36 video cameras.
- ³⁷ Using the remotely-operated fixed 6.25 Ton Grapple Hoist in the Facility Cask Loading Room,
- the ICV <u>inner-vessel</u> lid is lifted clear of the RH-TRU 72-B cask, and the <u>a</u>robotic Manipulator
- takes swipe samples and places them in a swipe delivery system for counting outside the
- 40 Transfer Cell. If found to be contaminated above acceptable <u>surface contamination</u> levels <u>as</u>
- described in 10 CFR Part 835, the Permittees have the option to decontaminate <u>consistent with</u>
- 42 <u>radiological control procedures</u>, or return the RH TRU Canister to the generator/storage site or
- another site for remediation, or manage the RH TRU Canister consistent with radiological
 control procedures pursuant to 10 CFR Part 835. Hazardous waste decontamination, if needed,

1 will be conducted in accordance with the requirements of the Permit and the standards of

2 20.4.1.500 NMAC (incorporating 40 CFR Part 264). If no contamination is found, the Transfer

3 Cell Shuttle Car moves a short distance, and the ICV <u>inner-vessel</u> lid is lowered onto a stand on

4 the Transfer Cell Shuttle Car. The, after which the canister is transferred to the Facility Cask as

5 described below.

6 CNS 10-160B Cask Unloading

After the lid bolts are removed, the CNS 10-160B cask is moved using the Cask Transfer Car 7 from the RH Bay into the Cask Unloading Room and centered beneath the Hot Cell shield plug 8 port. The Cask Unloading Room shield door is closed, and the inner and outer Hot Cell shield 9 plugs are removed simultaneously and set aside on the floor of the Hot Cell using the remotely 10 operated Hot Cell Bridge Crane. The Hot Cell Bridge Crane is then lowered through the Hot Cell 11 port and is connected to the CNS 10-160B cask lid rigging or lifting device. The Hot Cell Bridge 12 Crane lifts the CNS 10-160B cask lid through the Hot Cell port and sets the lid aside on the Hot 13 Cell floor. 14

¹⁵ Operations in the Hot Cell are monitored by closed-circuit television cameras. The drum

carriage unit lifting fixture (hereafter referred to as lifting fixture) is attached to the Hot Cell

Bridge Crane and lowered through the Hot Cell port. The lifting fixture is connected to the upper

drum carriage unit contained in the CNS 10-160B cask. The Hot Cell Bridge Crane lifts the

upper drum carriage unit from the CNS 10-160B cask through the port into the Hot Cell and sets
 it near the Hot Cell inspection station. The Hot Cell Bridge Crane again lowers the lifting fixture

through the Hot Cell port and connects to the lower drum carriage unit. The Hot Cell Bridge

Crane lifts the lower drum carriage unit from the CNS 10-160B cask through the port into the

Hot Cell and sets it near the upper drum carriage unit.

The Hot Cell Bridge Crane lifts the CNS 10-160B cask lid from the Hot Cell floor, lowers it

through the Hot Cell port and onto the top of the CNS 10-160B cask. The inner and outer Hot

26 Cell shield plugs are replaced simultaneously. The Cask Unloading Room shield door is

opened, and the CNS 10-160B cask is moved into the RH Bay using the Cask Transfer Car.

The CNS 10-160B cask is inspected and surveyed, the lid and impact limiter are reinstalled on

the CNS 10-160B cask, and it is prepared for transportation off-site.

The Hot Cell Bridge Crane connects to an empty Facility Canister, places it into a sleeve at the 30 inspection station, and removes the canister lid. The Overhead Powered Manipulator or Hot Cell 31 Crane lifts one drum from the drum carriage unit. The Hot Cell Manipulators collect swipe 32 samples from the drum and transfer the swipes via the Transfer Drawer to the Hot Cell Gallery 33 for counting. If the 55-gallon-gal (208-L) drums are contaminated, the Permittees may 34 decontaminate the 55-gallon-gal (208-L) drums or return them to the generator/storage site or 35 another site for remediation. The drum identification number is recorded, and the recorded 36 numbers are verified against the WWIS. If there are any discrepancies, the drum(s) in guestion 37 are stored within the Hot Cell, and the generator/storage site is contacted for resolution. 38 Discrepancies that are not resolved within 15 days will be reported to the NMED as required by 39 20.4.1.500 NMAC (incorporating 40 CFR §264.72). 40

Either the Overhead Powered Manipulator or Hot Cell Bridge Crane lowers the drum into the

Facility Canister. This process is repeated to place three drums in the Facility Canister. The Hot

43 Cell Bridge Crane or powered Manipulator lifts the canister lid and places it onto the Facility

44 Canister. The lid is locked in place using a Manipulator. Each CNS 10-160B cask shipment will

1 contain up to ten drums. Drums will beare managed in sets of three. If there is a tenth drum, it

2 will be placed in a Facility Canister or stored until WIPP receipt of the next CNS 10-160B cask

3 shipment at the WIPP facility. The Hot Cell Bridge Crane lifts the Facility Canister and lowers it

4 into the Transfer Cell.

5 To prepare to transfer a loaded Facility Canister from the Hot Cell to the Transfer Cell, a

6 Shielded Insert is placed onto a Cask Transfer Car in the RH Bay. The Cask Transfer Car is

7 then moved into the Cask Unloading Room and positioned under the Cask Unloading Room

8 Bridge Crane. The Bridge Crane attaches to the Shielded Insert. The Cask Unloading Room

9 Bridge Crane lifts and suspends the Shielded Insert clear of the Cask Transfer Car. The

10 Shielded Insert is aligned over the Cask Unloading Room port. The floor valve is opened, and

the Shielded Insert is lowered into the Transfer Cell Shuttle Car. The Cask Unloading Room

Bridge Crane is unhooked and retracted, and the Cask Unloading Room shield valve is closed.

13 The Shielded Insert is positioned under the Hot Cell port.

The Hot Cell Bridge Crane lifts a loaded, closed Facility Canister and positions it over the Hot Cell port. The Hot Cell shield valve is opened, and the crane lowers the Facility Canister through

the port into the Shielded Insert positioned in the Transfer Cell Shuttle Car in the Transfer Cell.

the port into the Shielded Insert positioned in the Transfer Cell Shuttle Car in the Transfer Cell. The Hot Cell Bridge Crane is disconnected from the Facility Canister and raised until the crane

18 hook clears the Hot Cell shield valve. The Hot Cell shield valve is then closed.

19 <u>Transfer of Disposal Canister into the Facility Cask</u>

20 The transfer of a canister into the Facility Cask from the Transfer Cell is monitored by closed-

21 circuit television cameras. The Transfer Cell Shuttle Car positions the RH-TRU 72-B cask or

22 Shielded Insert under the Facility Cask Loading Room port and the shield valve is opened. Then

the remotely operated 6.25 Ton Grapple Hoist attaches to the canister, and the canister is lifted

through the open shield valve into the vertically-oriented Facility Cask located on the <u>Facility</u>

25 Cask Transfer Car in the Facility Cask Loading Room. During this cask-to-cask transfer, the

telescoping port shield is in contact with the underside of the Facility Cask to assure shielding

continuity, as does the shield bell located above the Facility Cask.

28 For canisters received at the WIPP <u>facility</u> from the generator site in a RH-TRU 72-B cask, the

identification number is verified using cameras, which also provide images of the canister

30 surfaces during the lifting operation. Identification numbers are verified against the WWISin

31 accordance with Permit Attachment C, Section C-5b(1). If there are any discrepancies, the

canister is returned to the RH-TRU 72-B cask, returned to the Parking Area UnitPAU, and the

33 generator is contacted for resolution. Discrepancies that are not resolved within 15 days will be

reported to the NMED as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.72). As the

canister is being lifted from the RH-TRU 72-B cask into the Facility Cask, additional swipe

samples may be taken.

37 Transfer of the Canister to the Underground

- ³⁸ When the canister is fully within the Facility Cask, the lower shield value is closed. The 6.25 Ton
- ³⁹ Grapple Hoist detaches from the canister and is raised until the 6.25 Ton Grapple Hoist clears

the Facility Cask, at which time the upper shield valve is closed. The 6.25 Ton Grapple Hoist

- and shield bell are then raised clear of the Facility Cask, and the telescoping port shield is
- retracted. The Facility Cask Rotating Device rotates the Facility Cask until it is in the horizontal
- 43 position on the Facility Cask Transfer Car. The shield doors on the Facility Cask Loading Room

- are opened, and the facility-Facility Cask Transfer Car moves onto the waste-Waste shaft-Shaft
- 2 conveyance <u>Conveyance</u> and is lowered to the <u>waste</u> <u>Waste</u> Shaft Station underground. At the
- 3 waste <u>Waste</u> Shaft Station underground, the Facility Cask Transfer Car moves the Facility Cask
- 4 from the waste Waste shaft Shaft conveyance Conveyance. A forklift is used to remove the
- 5 Facility Cask from the Facility Cask Transfer Car and to transport the Facility Cask to the
- 6 Uunderground HWDU.

7 Returning the Empty Cask

The empty RH-TRU 72-B cask or Shielded Insert is returned to the RH Bay by reversing the process. In the RH Bay, swipe samples are collected from inside the empty cask. If necessary, the inside of the cask is decontaminated. The RH-TRU 72-B cask lids are replaced, and the cask is replaced on the trailer using the RH Bay Bridge Crane. The impact limiters are replaced, and the trailer and the RH-TRU 72-B cask are then moved out of the RH Bay. The Shielded Insert is stored in the RH Bay until needed.

14 A1-1d(4) Handling Waste in Shielded Containers

Remote-Handled TRU mixed waste received at the WIPP facility in shielded containers 15 will beare managed, stored, and emplaced as CH TRU mixed waste using the CH TRU mixed 16 waste handling equipment described in this Permit. Shielded containers with RH TRU mixed 17 waste will arrive by tractor-trailer at the WIPP facility in sealed HalfPACTs. Prior to unloading 18 the packages from the trailer, they will undergo security and radiological checks and shipping 19 documentation reviews. Consistent with the handling of HalfPACT shipping packages in Section 20 A1-1d(2), a forklift will remove the HalfPACT and transport it into the WHB and place the 21 HalfPACT at either one of the two TRUDOCKs in the TRUDOCK Storage Area of the WHB Unit. 22 23

An external survey of the HalfPACT ICV <u>lid will beis</u> performed as the OCV lid is removed. The ICV lid or closure lid will beis lifted under the VHS, and the contents will beare surveyed during and after this process is complete. A description of the VHS and criteria that are applied if

radiological contamination is detected are discussed in Section A1-1d(2).

28

Shielded containers will beare received as three-pack assemblies in HalfPACTs. An overhead 29 bridge crane will be sused to remove the contents of the shielded container assembly and place 30 them on a facility pallet. The containers will beare visually inspected for physical damage 31 (severe rusting, apparent structural defects, signs of pressurization, etc.) and leakage to ensure 32 they are in good condition prior to storage. Waste containers will are also be checked for 33 external radiological surface contamination through the use of swipes and radiation monitoring 34 equipment, consistent with radiological control procedures pursuant to 10 CFR Part 835. If a 35 primary waste container is not in good condition, the Permittees will either overpack the 36 container with another approved container, repair/patch the container in accordance with 49 37 CFR §173 and §178 (e.g., 49 CFR §173.28) appropriate standards and guidance (e.g., 40 CFR 38 §173.28), or-return the container to the generator, or send the HalfPACT to a third-party 39 contractor. If local decontamination activities are opted for, the work will be conducted in the 40

- 41 WHB Unit, consistent with radiological control procedures.
- 42

43 Once the shielded container assembly is on the facility pallet, the TRU mixed waste container

- identification numbers will beare verified against the Uniform Hazardous Waste Manifest and
- 45 the WWISin accordance with Permit Attachment C, Section C-5b(1). Inconsistencies will be
- resolved as discussed in Section A1-1d(2)<u>of this Permit Attachment</u>. Up to two three-pack

assemblies of shielded containers will beare placed on a facility pallet. The use of facility pallets

² will elevates the waste at least 6 in. (15 cm) from the floor surface. Pallets of waste will are then

3 be relocated tomaintained in the CH Bay Storage Area of the WHB Unit for normal storage or

4 will beare transported to the conveyance loading room as described in Section A1-1d(2).

⁵ 6 <u>A1-1e Inspections</u>

7 Inspection of containers and container storage area are required by 20.4.1.500 NMAC

8 (incorporating 40 CFR §264.174). These inspections are described in this section.

9 A1-1e(1) WHB Unit

The waste containers in storage will beare inspected visually or by closed-circuit television 10 camera prior to each movement and, at a minimum, weekly, to ensure that the waste containers 11 are in good condition and that there are no signs that a release has occurred. Waste containers 12 will be visually inspected for physical damage (severe rusting, apparent structural defects, signs 13 of pressurization, etc.) and leakage. If a primary waste container is not in good condition, the 14 Permittees will overpack the container, repair/patch the container in accordance with 49 CFR 15 §173 and §178 (e.g., 49 CFR §173.28), or return the container to the generator. This visual 16 inspection of CH TRU mixed waste containers shall not include the center drums of 7seven-17 packs and waste containers positioned such that visual observation is precluded due to the 18 arrangement of waste assemblies on the facility pallets. If waste handling operations should 19 stop for any reason with containers located at the TRUDOCK while still in the Contact-Handled 20 PackageCH package, primary waste container inspections will not be accomplished until waste 21 handling operations are resumed and the containers of waste are removed from the Contact-22 Handled PackageCH package. If the lid to the Contact-Handled PackageCH package ICV is 23 removed, radiological checks (swipes of Contact-Handled PackageCH package inner surfaces) 24 will beare used to determine if there is contamination within the Contact-Handled PackageCH 25 package. Such contamination could indicate a possible waste container leak or spill. Using 26 radiological surveys, a detected spill or leak of a radioactive contamination from a waste 27 container will also be assumed to be a hazardous waste spill or release. 28 Waste containers residing within a Contact-Handled Package are not inspected, as described in 29

30 the first bullet in Section A1-1e(2).

31 Waste containers will be inspected prior to reentering the waste management process line for

downloading to the underground. Waste containers stored in this area will be inspected at least once weekly.

- Loaded RH-TRU 72-B and CNS 10-160B casks will beare inspected when present in the RH Bay. Physical or closed-circuit television camera inspections of the RH Complex are conducted as described in Table DE-1a. Canisters loaded in an RH-TRU 72-B cask are inspected in the Transfer Cell during transfer from the cask to the Facility Cask. Waste containers received in CNS 10-160B casks are inspected in the Hot Cell during transfer from the cask to the Facility Canister by camera and/or visual inspection (through shield windows).
- 40 A1-1e(2) Parking Area Unit

Inspections will be<u>are</u> conducted in the Parking Area UnitPAU at a frequency not less than once weekly when waste is present. These inspections are applicable to loaded, stored Contact1 Handled and Remote-Handled Packages<u>CH and RH packages</u>. The perimeter fence located at

- the lateral limit of the Parking Area Unit<u>PAU</u>, coupled with personnel access restrictions into the
- 3 WHB, will provides the needed security. The perimeter fence and the southern border of the
- 4 WHB shall mark the lateral limit of the Parking Area Unit<u>PAU</u> (Figure <u>M-2</u>A1-2). Inspections of
- the Contact-Handled or Remote-Handled Packages<u>CH or RH packages</u> stored in the Parking
- 6 Area Unit<u>PAU</u> will focus on the inventory and integrity of the shipping containers and the
- 7 spacing between Contact-Handled and Remote-Handled Packages<u>CH or RH packages</u>. This
- 8 spacing will beis maintained at a minimum of four feet.

9 Contact-Handled and Remote-Handled Packages located in the Parking Area Unit will be

¹⁰ inspected weekly during use and prior to each reuse.

29

30

31

32

33

34

Inspection of waste containers is not possible when the containers are in their shipping 11 container (e.g., casks, TRUPACT-II or HalfPACTs). Inspections can be accomplished by 12 bringing the shipping containers into the WHB Unit and opening them and lifting-removing the 13 14 waste containers out for inspection. The DOE, however, believes that removing containers strictly for the purposes of inspection results in unnecessary worker exposures and subjects the 15 waste to additional handling. The DOE has proposed that waste containers need not be 16 inspected at all until they are ready to be removed from the shipping container for emplacement 17 underground. Because shipping containers are sealed and are of robust design, no harm can 18 come to the waste while in the shipping containers and the waste cannot leak or otherwise be 19 released to the environment. Contact-Handled or Remote-Handled Packages shall be opened 20 every 60 days for the purposes of venting, so that the longest amount of time waste containers 21 would be uninspected would be for 60-59 days from the date that the ICV of the Contact-22 Handled or Remote Handled Package was closed at the generator site after the ICV Closure 23 Date, as recorded in the WWIS. Venting the Contact-Handled or Remote-Handled Packages 24 involves removing the outer lid and installing a tool in the port of the inner lid. 25 The following strategy will be used for inspecting waste containers that will be retained within 26 their shipping containers for an extended period of time; this will minimize the amount of 27

- 28 shipping and waste handling, while maintaining a reasonable inspection schedule:
 - If the reason for retaining the TRU mixed waste containers in the shipping container is due to an unresolved manifest discrepancy, the DOE will return the shipment to the generator prior to the expiration of the 60-day NRC venting period or within 30 days after receipt at the WIPP <u>facility</u>, whichever comes sooner. In this case, no inspections of the internal containers will be performed. The stored Contact-Handled or Remote-Handled Package<u>CH or RH package</u> will be inspected weekly as described above.

- If the reason for retaining the TRU mixed waste containers in the Contact-Handled or 35 • Remote Handled PackageCH or RH package is due to an equipment malfunction that 36 prevents unloading the waste in the WHB Unit, the DOE will return the shipment to the 37 38 generator prior to the expiration of the 60-day NRC venting period. In this case, the DOE would have to ship the TRU mixed waste containers back with sufficient time for 39 the generator to vent the shipment within the 60-day limitNRC venting period. In this 40 case, no inspections of the internal containers will be performed. The stored Contact-41 Handled or Remote-Handled PackageCH or RH package will be inspected weekly as 42 described above. 43

1 • If the reason for retaining the TRU mixed waste containers is due to an equipment malfunction that prevents the timely movement of the waste containers into the 2 underground, the waste containers will may be kept in the Contact-Handled or 3 Remote-Handled PackageCH or RH package no longer than day 59 until day 30 (after 4 receipt at the WIPP) or the expiration of the 60-day limitNRC venting period, 5 whichever comes sooner. At that time the Contact-Handled or Remote-Handled 6 PackageCH or RH package will be moved into the WHB_Unit. Contact-Handled 7 handled TRU mixed waste containers will be removed and placed in one of the 8 permitted storage areas in the WHB Unitfrom their shipping package; if the maximum 9 capacity of the CH Bay Storage Area has been reached, the Permittees may 10 implement CH Bay Surge Storage in accordance with the notification requirements of 11 Permit Part 3, Section 3.1.1.3. The Remote Handled Package RH package will be 12 vented, however, the containers will not be removed from the shipping package. If 13 there is no additional space within the permitted storage areas of the WHB Unit, the 14 DOE-Permittees will discuss an emergency permit with the NMED for the purposes of 15 storing the waste-elsewhere in the WHB Unit. Waste containers will be inspected when 16 removed from the Contact-Handled PackagingCH packaging and weekly while in 17 storage in the WHB Unit. Contact-Handled or Remote-Handled Packages The CH or 18 RH packages will be inspected weekly while they contain TRU mixed waste containers 19 as discussed above. 20

The DOE believes that this strategy minimizes both the amount of shipping that is necessary 21 and the amount of waste handling, while maintaining a reasonable inspection schedule. The

22 DOE will stop shipments of waste for any equipment outage that will extend beyond three days.

23

A1-1f Containment 24

The WHB Unit has concrete floors, which are sealed with a coating that is designed to resist all 25 but the strongest oxidizing agents. Such oxidizing agents do not meet the TSDF-WAC and will 26 are not be accepted in TRU mixed waste at the WIPP facility. Therefore, TRU mixed wastes 27 pose no compatibility problems with respect to the WHB Unit floor. The floor coating consists of 28 Carboline[®] 1340 clear primer-sealer on top of prepared concrete, Carboline[®] 191 primer epoxy, 29 and Carboline[®] 195 surface epoxy. The manufacturer's chemical resistance guide shows "Very 30 Good" for acids and "Excellent" for alkalies, solvents, salt, and water. Uses are indicated for 31 nuclear power plants, industrial equipment and components, chemical processing plants, and 32 pulp and paper mills for protection of structural steel and concrete. During the Disposal Phase, 33 should the floors need to be re-coated, any floor coating used in the WHB Unit TRU mixed 34 waste handling areas will be compatible with the TRU mixed waste constituents and will have 35 chemical resistance at least equivalent to the Carboline® products. Figure A1-1 shows where 36

TRU mixed waste handling activities discussed in this section occur. 37

During normal operations, the floor of the storage areas within the WHB Unit shall be are visually 38 39 inspected on a weekly basis to verify that it-the concrete floor is in good condition and free of obvious cracks and gaps. Floor areas of the WHB Unit in use during off-normal events will 40 beare inspected prior to use and weekly thereafter. All TRUTransuranic mixed waste containers 41 located in the permitted storage areas shall beare elevated at least 6 in. (15 cm) from the 42 surface of the floor. TRU mixed waste containers that have been removed from Contact-43

Handled or Remote Handled PackagingCH or RH packages shall beare stored at a designated 44

storage area inside the WHB Unit so as to preclude exposure to the elements. 45

1 Secondary containment at the CH Bay Storage Area inside the WHB Unit shall beis provided by

- 2 the WHB Unit <u>concrete</u> floor (See Figure <u>M-1A1-1</u>). The WHB Unit is engineered such that
- ³ during normal operations, the floor capacity is sufficient to contain liquids upon release.
- 4 Secondary Containment at the Derived Waste Storage Area of the WHB Unit will beis provided
- 5 by a polyethylene standard drum<u>containment</u> pallet. The Parking Area Unit<u>PAU</u> and TRUDOCK
- 6 Storage Area of the WHB Unit require no engineered secondary containment since no waste is
- 7 to be stored there unless it is protected by the Contact-Handled or Remote-Handled
- 8 Packaging<u>CH or RH packaging</u>.

9 Calculations to determine the floor surface area required to provide secondary containment in

the event of a release are based on the maximum quantity of liquid which could be present

11 within ten percent of one percent of the volume of all-the containers or one percent of the

- capacity of the largest single container, whichever is greater.
- Secondary containment at storage locations inside the RH Bay and Cask Unloading Room is 13 14 provided by the cask. Secondary containment at storage locations inside the Transfer Cell is provided by the RH-TRU 72-B cask or Shielded Insert. Secondary containment at storage 15 locations in the Facility Cask Loading Room is provided by the Facility Cask. In the Hot Cell, 16 waste containers are stored in either the drum carriage unit or in canister sleeves Facility 17 Canisters. The Lower Hot Cell provides secondary containment as described in section A1-f(2). 18 In addition, the RH Bay, Hot Cell, and Transfer Cell contain 220-gallon-gal (833-L) (Hot Cell), 19 11,400-gallon-gal (43,152-L) (RH Bay), and 220-gallon-gal (833-L) (Transfer Cell) sumps, 20 respectively, to collect any liquids. 21

22 A1-1f(1) Secondary Containment Requirements for the WHB Unit

- ²³ The maximum TRU mixed waste volume on facility pallets that <u>will-could</u> be stored in the CH
- Bay Storage and Surge Storage Areas of the WHB is 18 facility pallets @ 2 TDOPs per pallet =
- 25 36 TDOPs of waste. 36 TDOPs @ 1,200 gal (4,540 L) per TDOP = 43,200 gal (163,440_L)
- waste container capacity. 43,200 gal (163,440 L) x ten percent of the total volume = 4,320 gal
- 27 (16,344 L) of waste. Since 4,320 gal (16,344 L) is greater than 1,200 gal (4,540 L), the
- configuration of possible TDOPs in the storage area is used for the calculation of secondary
- containment requirements. 4,320 gal (16,344 L) of liquid x one percent liquids = 43.2 gal (163.4
- L) of liquid for which secondary containment is needed.
- The maximum TRU mixed waste volume that <u>will-could</u> be stored in the Derived Waste Storage Area of the WHB Unit is one SWB. 1 SWBs @ 496 gal (1,878 L) per SWB = 496 gal (1,878 L) waste container capacity. Since the maximum storage volume of 496 gal (1,878 L) is equal to the volume of the largest single container, the volume of the a single SWB is used for the calculation of secondary containment requirements. 496 gal (1,878 L) of liquid x one percent liquids = 4.96 gal (18.8 L) of liquid for which secondary containment is needed.
- The maximum TRU mixed waste volume that $\frac{\text{will-could}}{\text{sould}}$ be stored in the Hot Cell is 13 RH TRU drums @ 55 gal (210 L) per drum = 715 gal (2,730 L) of waste in drums. 715 gal (2,730 L) of waste x ten percent of total volume = 71.5 gal (273 L) of waste. Secondary containment for liquids will need to have a capacity of 71.5 gal (273 L). Since 71.5 gal (273 L) is less than the volume of the single container of 235 gal (890 L) therefore, the larger volume is used for determining the secondary containment requirements. 235 gal (890 L) of waste x one percent liquids = 2.35 gal (8.9 L) of liquid needed for secondary containment
- liquids = 2.35 gal (8.9 L) of liquid needed for secondary containment.

1 The maximum TRU mixed waste volume that will <u>could</u> be stored in the Transfer Cell is one RH-

2 TRU 72-B Canister or one Facility Canister @ 235 gal (890 L) per canister x ten percent of total

volume = 23.5 gal (8.90 L) of waste. Since 23.5 gal (8.90 L) is less than the volume of the single

4 container of 235 gal (890 L) therefore, the larger volume is used for determining the secondary

5 containment requirements. 235 gal (890 L) of waste x one percent liquids = 2.35 gal (8.9 L) of

6 liquid needed for secondary containment.

7 A1-1f(2) Secondary Containment Description

8 The following is a calculation of the surface area the quantities of liquid would cover. Using a

- conversion factor of 0.1337 ft³/gal (0.001 m³/L) and assuming the spill is 0.0033 ft (0.001 m) thick, the following calculation can be used:
- 11 gallons \times cubic feet per gallon \div thickness in feet = area covered in square feet
- 12 CH Bay Storage Area
- 13 43.2 gal \times 0.1337 ft³/gal \div 0.0033 ft = 1,750 ft² (162.7 m²)
- 14 Hot Cell
- 15 2.35 gal \times 0.1337 ft³/gal \div 0.0033 ft = 95 ft² (8.8 m²)
- 16 Transfer Cell
- 17 2.35 gal \times 0.1337 ft³/gal \div 0.0033 ft = 95 ft² (8.8 m²)

The WHB Unit has 33,175 ft² (3,082 m²) of floor space, the CH Bay Storage Area has 26,151 ft²

 $(-(2,430 \text{ m}^2))$ of floor space. The CH Bay Storage Area requires 1,750 ft² (162.7 m²) for

containment, Thus, the floor area of the CH Bay Storage Area of the WHB Unit provide

sufficient secondary containment to contain a release of ten percent of one percent of the
 volume of all of the containers, or one percent of the capacity of the largest container, whichever

is greater.

The Hot Cell and Transfer Cell are the only portions of the RH Complex managing RH TRU mixed waste outside of casks or canisters. The Hot Cell has 1,841 ft² (171 m²) of floor space and the Transfer Cell has 1,003 ft² (93 m²) of floor space. The Hot Cell and Transfer Cell require only 95 ft² for containment, therefore there is sufficient floor space to contain a release of ten percent of one percent of containers in these storage areas.

In addition, both the Hot Cell and the Transfer Cell each contain a 220 gal (833 L) sump that will
 collect any-liquids that spill from containers.

- 31 Derived Waste Storage Area
- The derived waste containers in the Derived Waste Storage Area will beare stored on standard
- 33 drum<u>containment</u> pallets, which provides approximately 50 gal (190 L) of secondary
- ³⁴ containment capacity. Thus_± the secondary containment capacity of the standard
- drum<u>containment</u> pallet is sufficient to contain a release of ten percent of one percent of the
- ³⁶ largest container (4.96 gal or 18.8 L).

1 Parking Area Unit

- 2 Containers of TRU mixed waste to be stored in the Parking Area UnitPAU will beare in Contact-
- 3 Handled or Remote-Handled Packages<u>CH or RH packages</u>. There will be are no additional

4 requirements for engineered secondary containment systems.

5 A1-1g Special Requirements for Ignitable, Reactive, and Incompatible Waste

6 Special requirements for ignitable, reactive, and incompatible waste are addressed in

7 20.4.1.500 NMAC (incorporating 40 CFR §§264.176 and 264.177). Permit Part 2 precludes

⁸ ignitable, reactive, or incompatible waste at the WIPP<u>facility</u>. No additional measures are

9 required.

10 A1-1h Closure

11 Clean closure is planned in accordance with 20.4.1.500 NMAC (incorporating 40 CFR

12 §264.178) for all-permitted container storage areas. The applicable areas and the plans for

13 clean closure are detailed in Permit Attachment G.

14 A1-1i Control of Run On

15 The WHB Unit is located indoors which prevents run-on from a precipitation event. In addition,

the CH TRU containers are stored on facility pallets, or standard drum

¹⁷ pallets, which elevate the CH TRU mixed waste containers at least 6 in. (15 cm) off the floor, or

in Contact-Handled or Remote-Handled Packages<u>CH or RH packages</u>, so that any firewater

released in the building will not pool around containers. Within the RH Bay, Cask Unloading

20 Room, Transfer Cell, and Facility Cask Loading Room, waste containers are stored in casks or

21 Shielded Inserts and protected from any potential run on. Any firewater released in the building

will not pool around the waste containers as they are stored in casks, or Shielded Inserts. Within the Hot Cell, there is no source of water during operations. However, control of run-on is

the Hot Cell, there is no source of water during operations. However, control of run-on is provided by the Lower Hot Cell, which lies below a sloped floor surrounded by a grating and

canister sleeves Facility Canisters in the Hot Cell above.

In the Parking Area Unit<u>PAU</u>, the containers of TRU mixed waste are always in Contact-

27 Handled or Remote-Handled Packages<u>CH or RH packages</u> which protect them from

precipitation and run on. Therefore, the WIPP <u>facility</u> container storage units will comply with the

requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.175(b)(4)).

- 1 References
- 2 DOE, 1997a. Resource Conservation and Recovery Act Part B Permit Application, Waste
- ³ Isolation Pilot Plant (WIPP), Carlsbad, New Mexico, Rev. 6.5, 1997.
- 4 DOE, 1997b. Waste Isolation Pilot Plant Safety Analysis Report (DOE/WIPP-95-2065, Rev. 1),
- 5 U.S. Department of Energy, Carlsbad Area Office, Carlsbad, NM, April 1997.
- <u>DOE, 2009. WIPP Hazardous Waste Facility Permit Amended Renewal Application, Carlsbad,</u>
 <u>New Mexico, September 2009.</u>
- 8 EPA. 2015. SW-846, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.
- 9 Office of Solid Waste and Emergency Response, Washington, D.C.

TABLES

Table A1-1 Basic Design Requirements, Principal Codes, and Standards

	Structure/Supports			Liquid and Process Air Handling Processing and storage equipment						Air Hdlg Ducting & Fans	HVAC	filters	Mechanical Handling Equipment			Instrumentation and Electrical		Quality Assurance Program			
			Site- specific Require- ments		Piping Valve ANSI BBB,1 NFPA*		Pumps API-610	API-650	Heat Exchgrs ASME VIII TEMA	All Other Equip- ment Mfrs Std	ARI SMACNA AMCA	Pre- filters ASHRAE 52.68	509	Crane and Related equipment CMAA	CMAA	All Other Equip- meant Mfrs STD	A-NE	ANSI Sods or Nat'l Elect- trial Code	IA/ Mfrs Std		
Design Class I	×		a	X f			×	×	×		e X	X c,d	e X	×	×		×	×		×	
Design Class li	a,b	×	a	×	¥		×	×	×		e X	e X	e X	×	×			×	¥	×	
Design Class liia	a	×	a	a	¥		a			×	e X	e X	e X	a	a	×		×	¥	×	
Design Class lii		×	g		a	X				×	×	×	¥			×		×	¥		×

X - Minimum Requirements

* Requirements to be determined on a case-by-case basis.

^b-Required for structure and supports needed for confinement and control of radioactivity.

e—Except structures and supports that are designed to withstand a design basis earthquake (DBE)/design basis tornado (DBT) when specified in column 1 of this table.

^d Underwriter's Laboratory (UL) Class I Listed.

* For fire-protection systems.

^f American Society for Mechanical Engineers (ASME) III for other Class I vessels.

^e—Design of underground structures, mining equipment, and facilities are basically governed by the MSHA and experience in local mines.

3

ACI - American Concrete Institute	CMAA Crane Manufacturers Association	MIL - Military (specification)
AISC - American Institute of Steel Construction	DBE - Design basis earthquake	MSHA - Mine Safety and Health Administration
AMCA – Air Moving and Conditioning Association	DBT – Design basis tornado	NFPA - National Fire Protection Association
ANSI - American National Standards Institute	HEPA - High efficiency particulate air	NQA - Nuclear Quality Assurance (Standard)
API - American Petroleum Institute	HVAC - Heating, Ventilation, and Air-Conditioning	SMACNA - Sheet Metal and Air Conditioning
ARI - Air Conditioning and Refrigeration Institute	A - Institute of Electronics and Electronic Engineers	Contractors National Association, Inc.
ASHRAE - American Society of Heating, Refrigeration, and	IA	STD - Standard
Air Conditioning Engineers, Inc.	MFR - Manufacturer	TEMA - Tubular Exchanger Manufacturers
AWS - American Welding Society		Association

UP - Uniform Plumbing Code

Table A1-1 TRU Mixed Waste Containers^a

	VOL	JME	DIN	MENSIONS (inche	<u>s)</u>			
DESCRIPTION	CUBIC FEET	<u>CUBIC</u> METERS	<u>LENGTH</u>	<u>WIDTH OR</u> DIAMETER	<u>HEIGHT</u>	LINER	<u>USE FOR</u> <u>DERIVED</u> <u>WASTE</u>	<u>FIGURE</u>
<u>55-gal (208-L) drum</u>	<u>7.4</u>	<u>0.21</u>	<u>N/A</u>	<u>24</u>	<u>35</u>	<u>Optional</u>	<u>Yes</u>	<u>M-3</u>
Standard waste box	<u>66.3</u>	<u>1.88</u>	<u>71</u>	<u>54</u>	<u>36</u>	No	<u>Yes</u>	<u>M-4</u>
Ten-drum overpack	<u>160</u>	<u>4.5</u>	<u>N/A</u>	<u>72</u>	<u>73</u>	No	<u>Yes, in under-</u> <u>ground</u>	<u>M-5</u>
<u>85-gal (322-L) drum</u>	<u>11.4</u>	<u>0.32</u>	<u>N/A</u>	<u>26</u>	<u>36</u>	<u>Optional</u>	<u>Yes</u>	<u>M-6</u>
<u>100-gal (379-L) drum</u>	<u>13.4</u>	<u>0.38</u>	<u>N/A</u>	<u>32</u>	<u>35</u>	<u>Optional</u>	No	<u>M-7</u>
Standard large box 2	<u>261</u>	<u>7.39</u>	<u>108</u>	<u>69</u>	<u>73</u>	No	No	<u>M-8</u>
Facility canister	<u>31.4</u>	<u>0.89</u>	<u>N/A</u>	<u>28</u>	<u>117</u>	No	No	<u>M-9</u>
RH TRU canister	<u>31.4</u>	<u>0.89</u>	<u>N/A</u>	<u>26</u>	<u>120</u>	Insert optional	No	<u>M-10</u>
Shielded container	<u>7.4</u>	<u>0.21</u>	<u>N/A</u>	<u>23</u>	<u>36</u>	<u>1 inch of lead</u> shielding	No	<u>M-11</u>

N/A Not applicable to drums

<u>TRU mixed waste containers may also be used to overpack waste containers that, upon removal from the shipping package, have been determined to be leaking or not in good condition.</u>

Table A1-2 <u>CH TRU Mixed</u> Waste Handling Equipment Capacities

CAPACITIES FOR EQUIPMENT (1b)	
CH Bay overhead bridge crane	12,000 -lbs.
Surface forklifts	26,000- lbs. (CH Bay forklift) 70,000- lbs. (TRUPACT-III Handler forklift)
Facility Pallet	25,000 -lbs.
Adjustable center of gravity lift fixture	10,000 -lbs.
Facility Transfer Vehicle	30,000 -lbs.
Yard Transfer Vehicle	60,000 -lbs.
MAXIMUM GROSS WEIGHTS OF CONTAIN	ERS <u>(lb)</u>
Seven-pack of 55- gallon-g<u>al (208-L)</u>drums	7,000 -lbs.
Four-pack of 85- gallon-gal (322-L)_ drums	4, 500<u>4,000</u>-lbs.
Three-pack of 100- gallon-gal (379-L) drums	3,000 -lbs.
Ten-drum overpack	6,700 -lbs.
Standard waste box	4,000- lbs.
Standard large box 2	10,500 -lbs.
Shielded container	2,260- lbs.
Three-pack of shielded containers	7,000- lbs.
MAXIMUM NET EMPTY WEIGHTS OF EQUIP	MENT <u>.(Ib)</u>
TRUPACT-II	13,140 -lbs.
HalfPACT	10,500 -lbs.
TRUPACT-III	43,600 -lbs.
Adjustable center of gravity lift fixtureLift Fixture	2,500- lbs.
Facility pallet	4,120 -lbs.

Table A1-3
RH TRU Mixed Waste Handling Equipment Capacities

CAPACITIES FOR EQUIPMENT (tons)							
RH Bay Overhead Bridge Crane	140 -tons main hoist 25 -tons auxiliary hoist						
RH-TRU 72-B Cask Transfer Car	20 -tons						
CNS 10-160B Cask Transfer Car	35 -tons						
Transfer Cell Shuttle Car	29 -tons						
Hot Cell Bridge Crane	15 -tons						
Overhead Powered Manipulator	2.5-tons						
Facility Cask Rotating Device	No specific load rating						
Cask Unloading Room Crane	25 -tons						
6.25 Ton Grapple Hoist	6.25 .tons						
Facility Cask Transfer Car	40 -tons						
MAXIMUM GROSS WEIGHTS OF R	H TRU CONTAINERS <u>(b)</u>						
RH TRU Canister	8,000 -lbs						
55- Gallon <u>g</u>al (208-L) Drum	1,000 -lbs						
Facility Canister	10,000 -lbs						
MAXIMUM NET EMPTY WEIGHT	S OF EQUIPMENT <u>(lb)</u>						
RH-TRU 72-B Cask	37,000 -lbs						
CNS 10-160B Cask	57,500 -lbs						
Facility Cask	67,700 -lbs						
Light Weight Facility Cask	<u>48,450</u>						
Shielded Insert	26,300 -lbs						

1

FIGURES

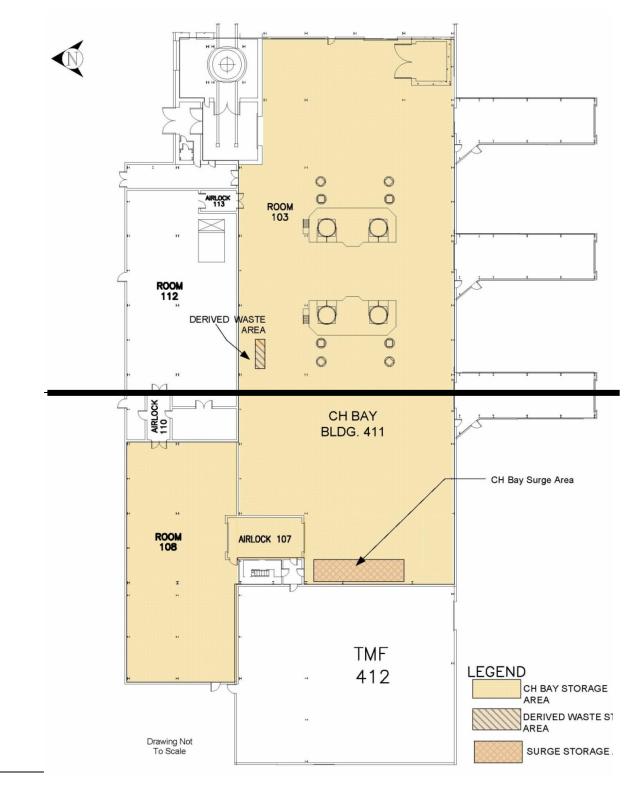


Figure A1-1 Waste Handling Building - CH TRU Mixed Waste Container Storage and Surge Areas

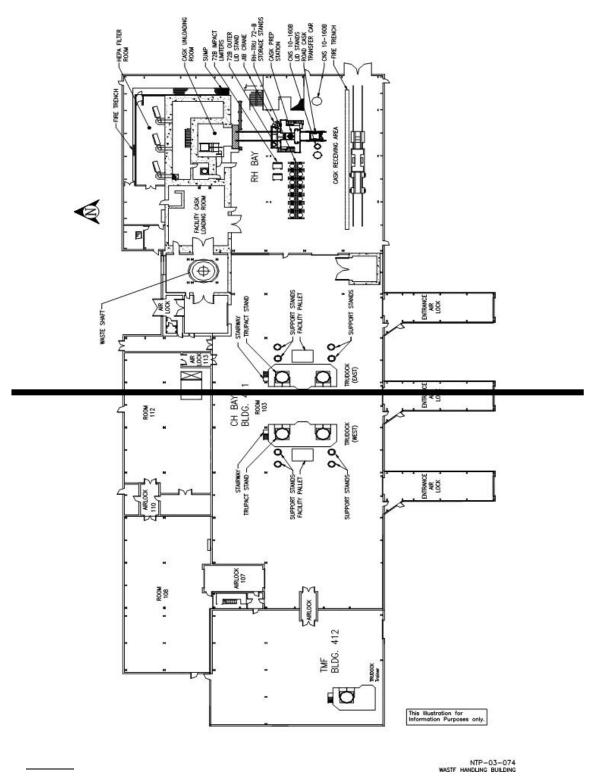


Figure A1-1a Waste Handling Building Plan (Ground Floor)

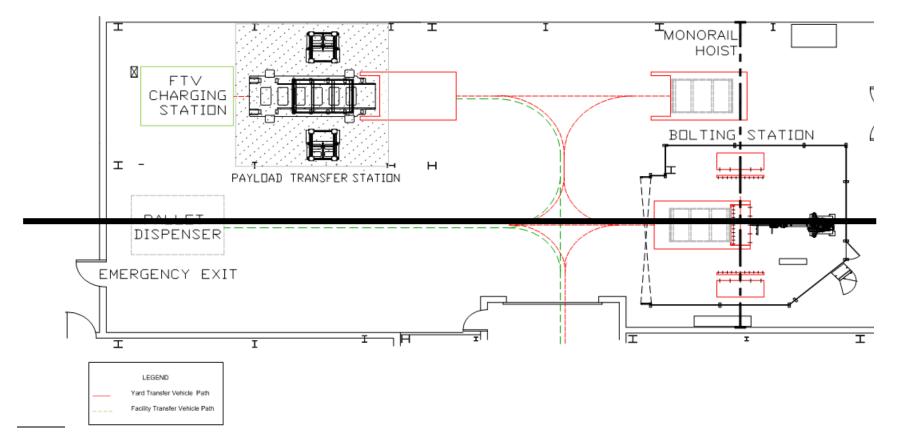


Figure A1-1b Waste Handling Building Plan (Room 108 Detail)

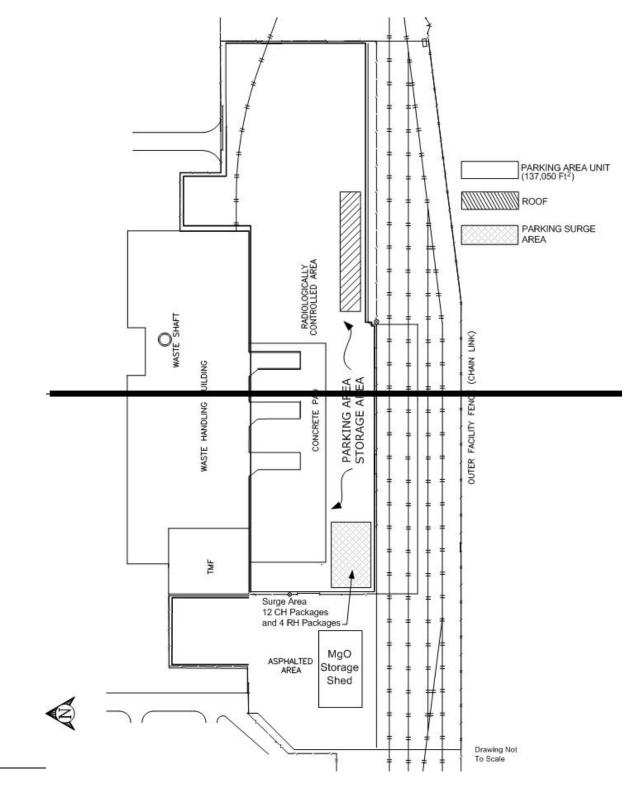


Figure A1-2 Parking Area - Container Storage and Surge Areas

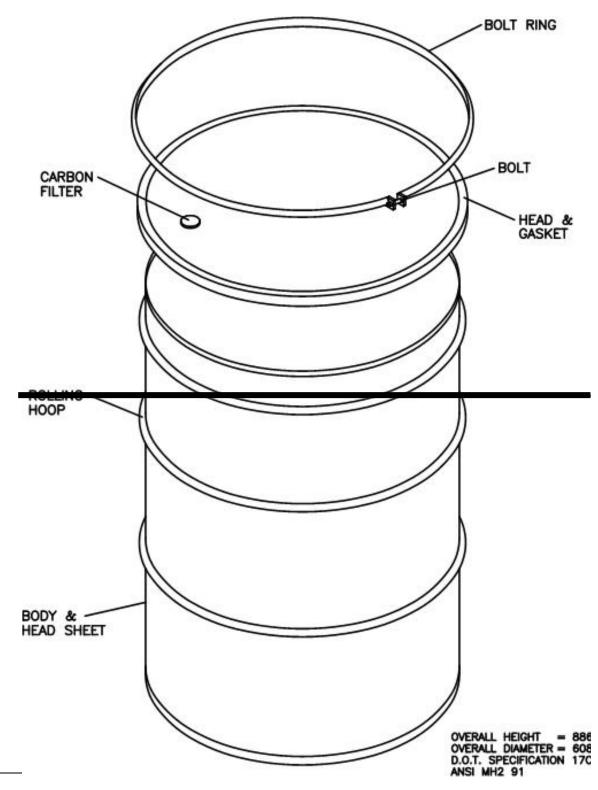


Figure A1-3 Standard 55-Gallon Drum (Typical)

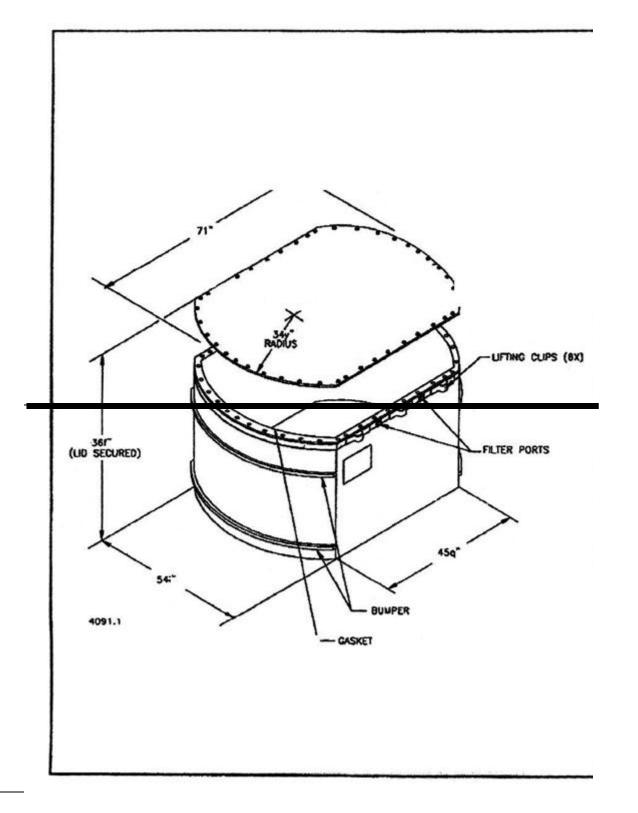


Figure A1-4 Standard Waste Box

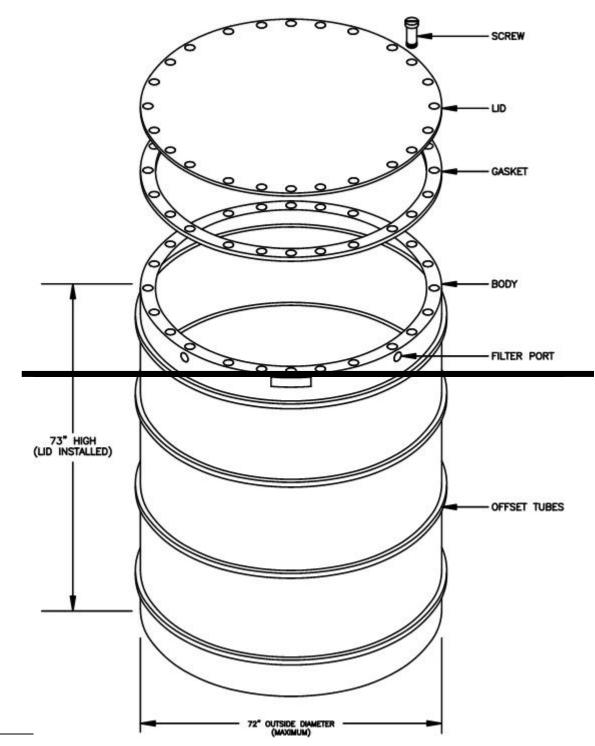


Figure A1-5 Ten-Drum Overpack

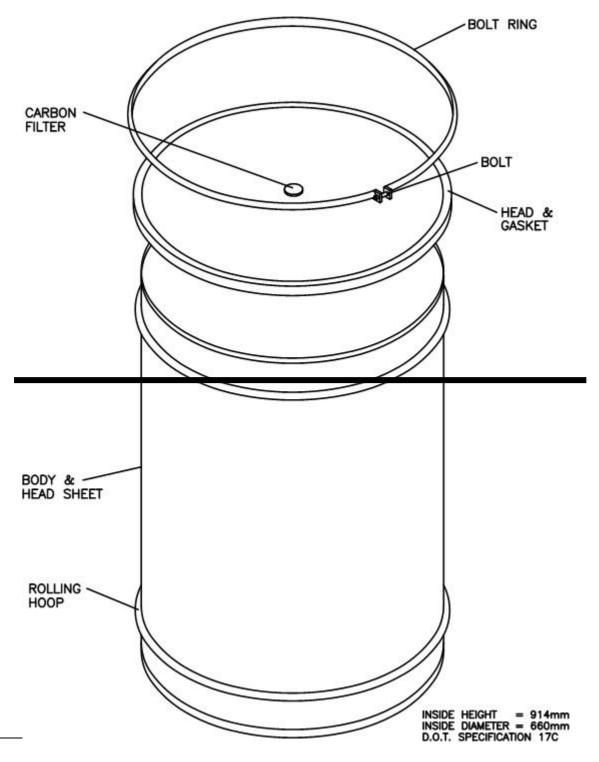
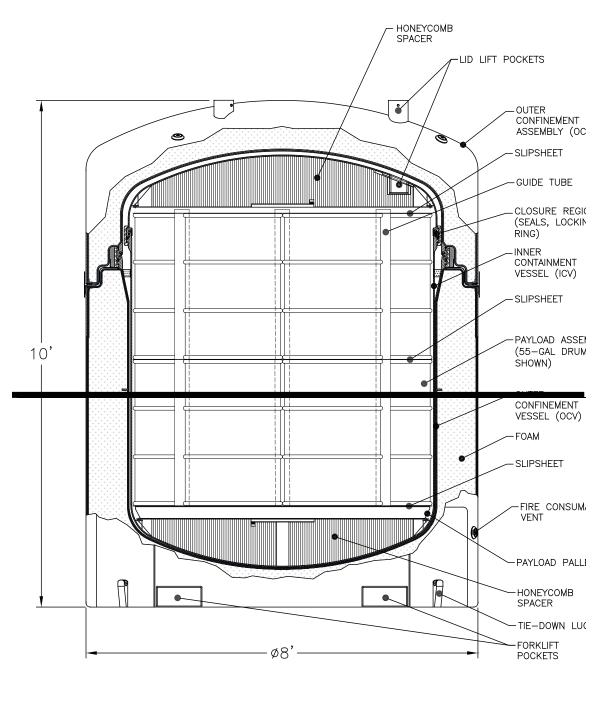
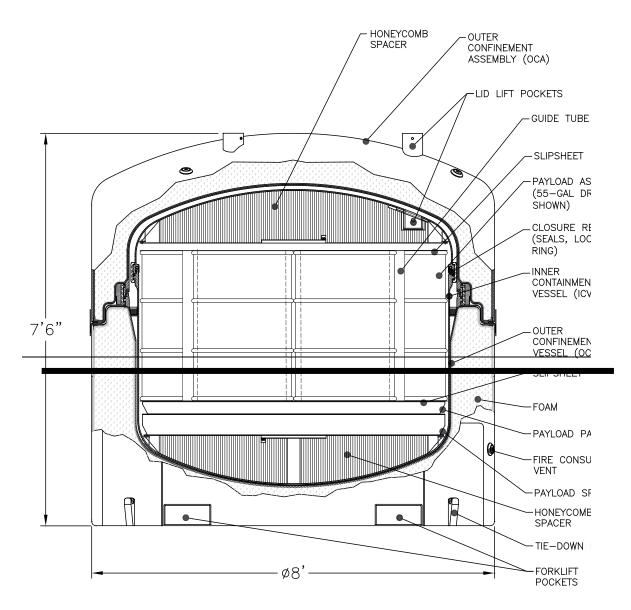


Figure A1-6 85-Gallon Drum



THIS ILLUSTRATION FOR INFORMATIONAL PURPOSES ON NOT TO SCALE

Figure A1-8a TRUPACT-II Shipping Container for CH Transuranic Mixed Waste (Schematic)



THIS ILLUSTRATION FOR INFORMATIONAL PURPOSES NOT TO SCALE

Figure A1-8b Typical HalfPACT Shipping Container for CH Transuranic Mixed Waste (Schematic)

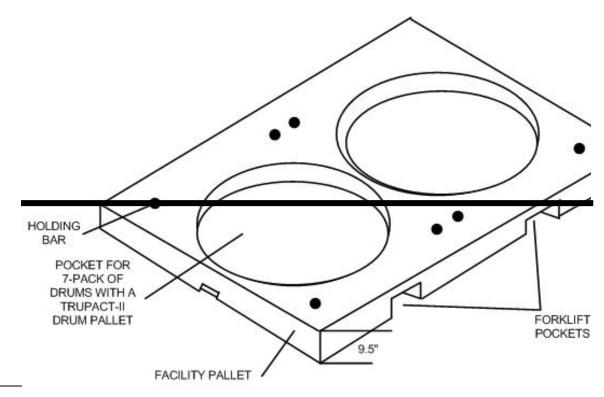


Figure A1-10 Facility Pallet for Seven-Pack of Drums

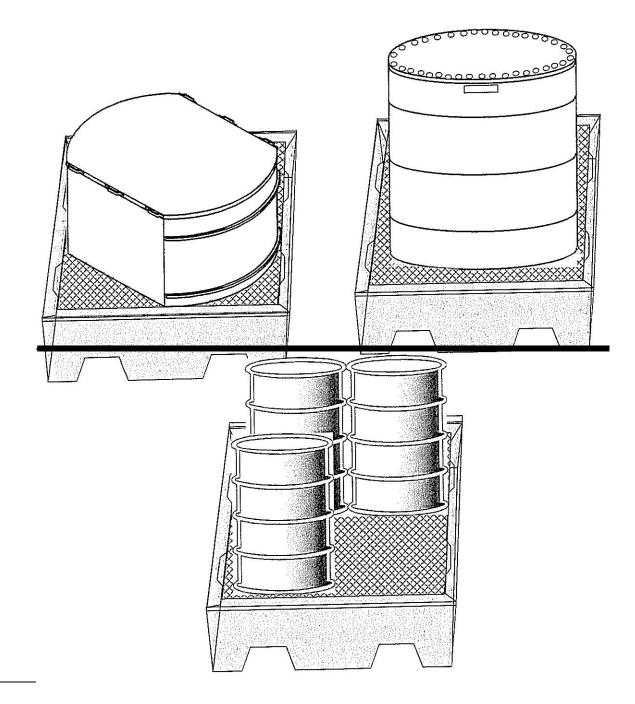


Figure A1-10a Typical Containment Pallet

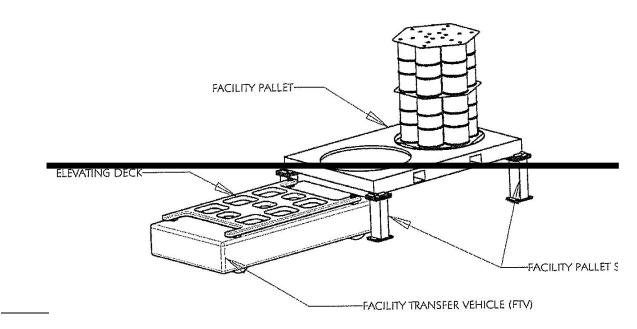


Figure A1-11 Facility Transfer Vehicle, Facility Pallet, and Typical Pallet Stand

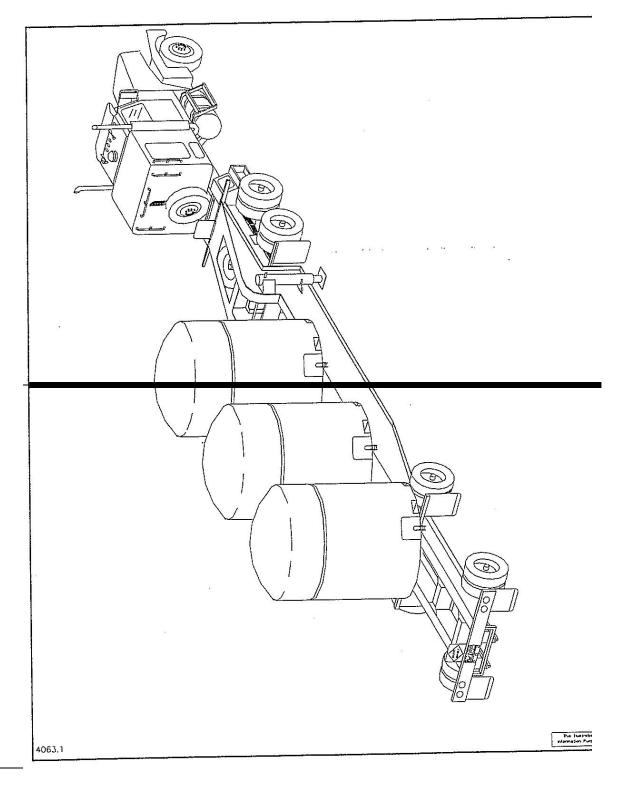


Figure A1-12 TRUPACT-II Containers on Trailer

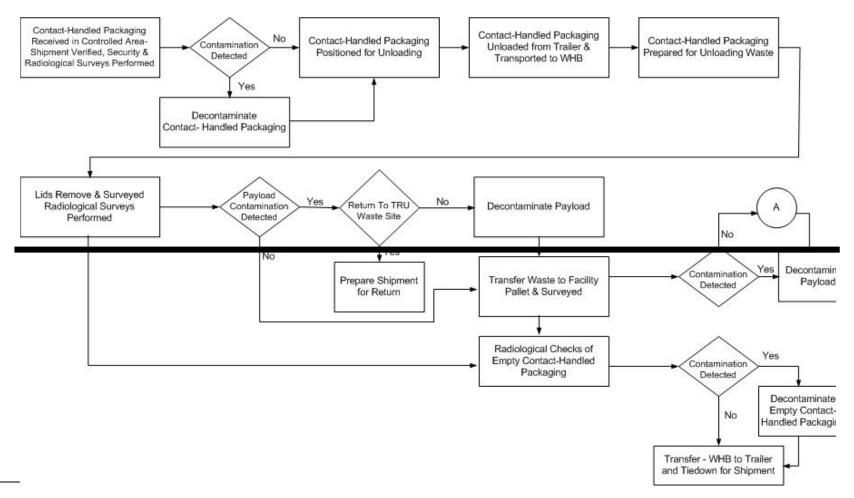


Figure A1-13 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram

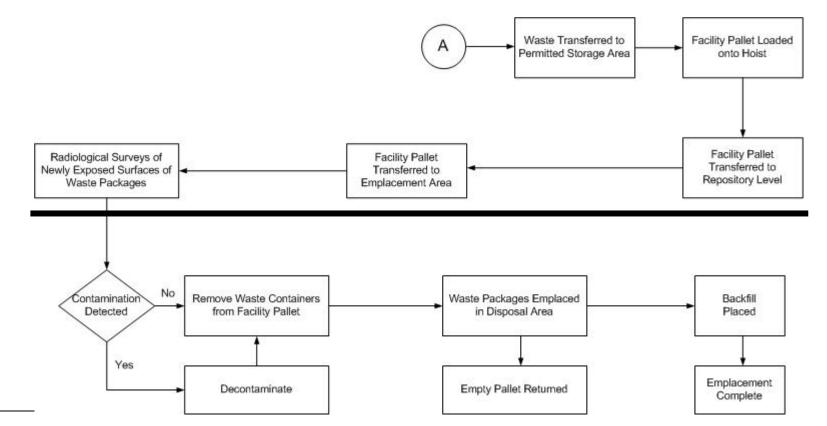


Figure A1-13 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram (Continued)

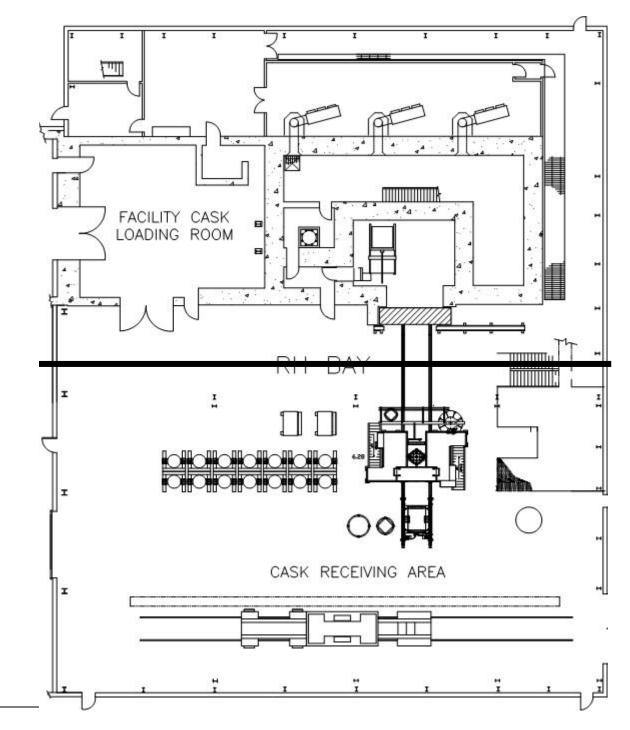
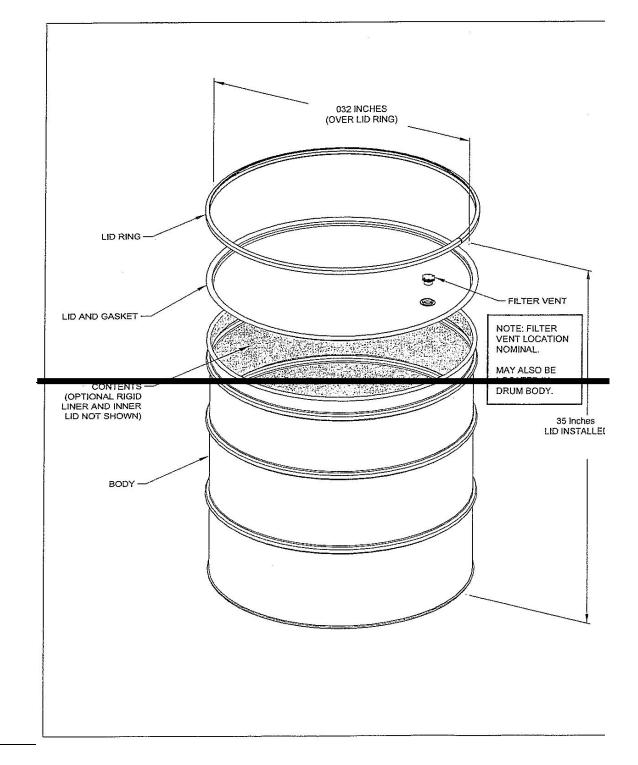
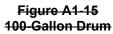


Figure A1-14a RH Bay Ground Floor





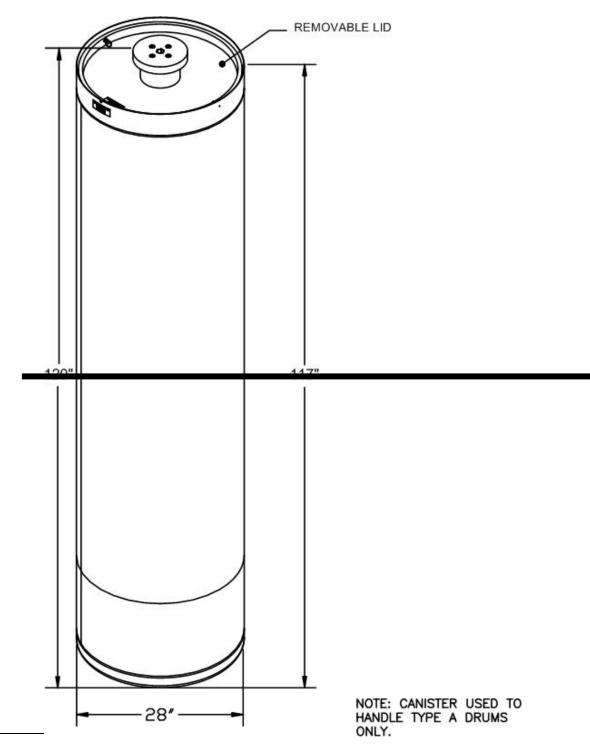


Figure A1-16 Facility Canister Assembly

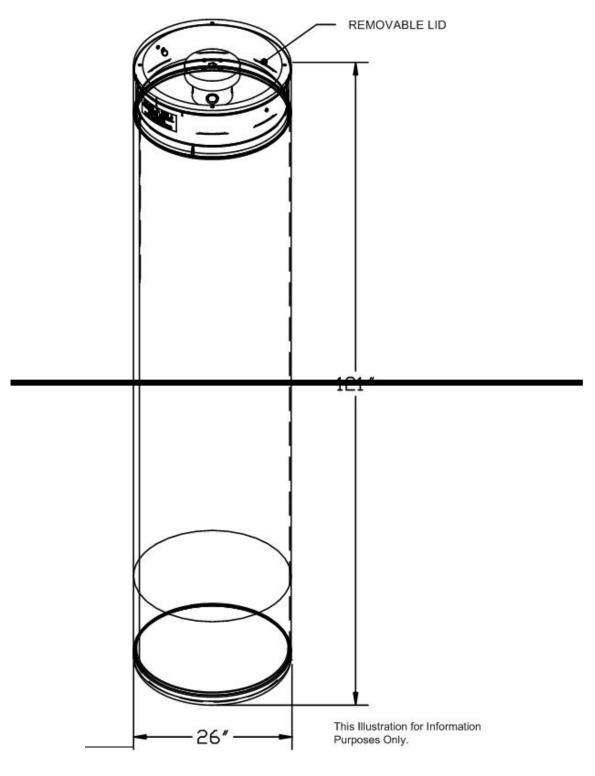


Figure A1-16a RH-TRU 72-B Canister Assembly

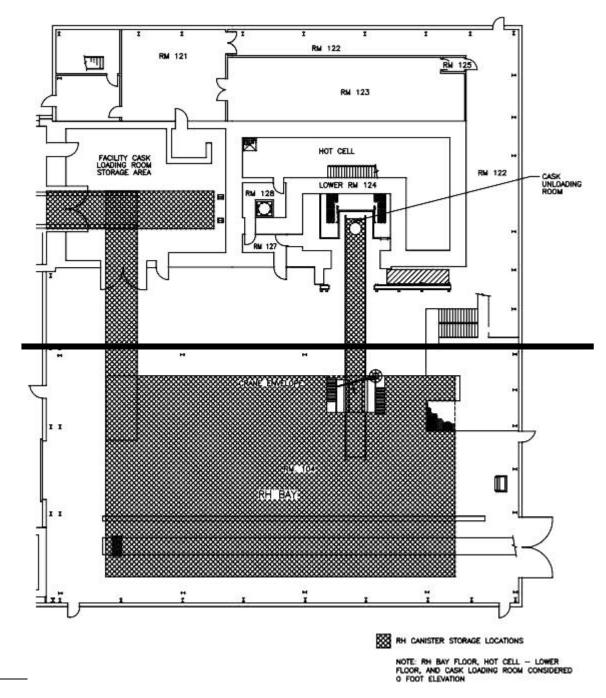


Figure A1-17a RH Bay, Cask Unloading Room, Hot Cell, Facility Cask Loading Room

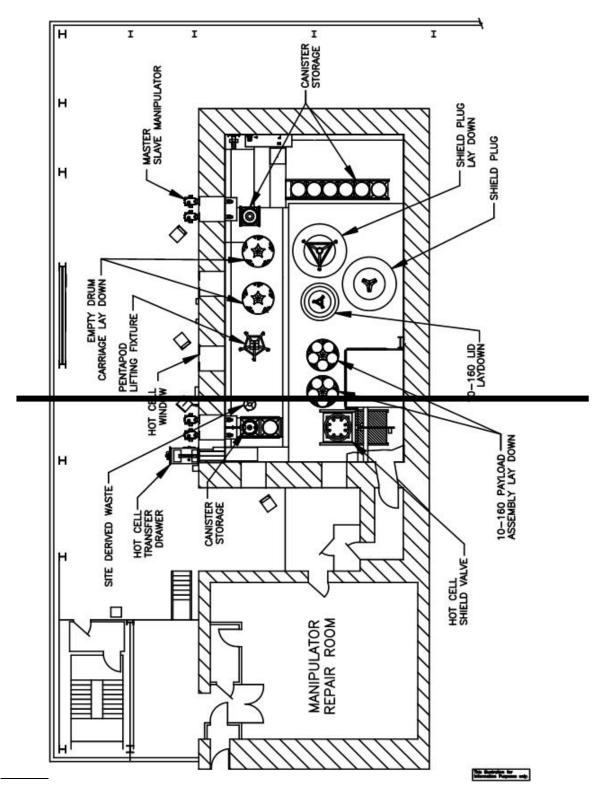


Figure A1-17b RH Hot Cell Storage Area

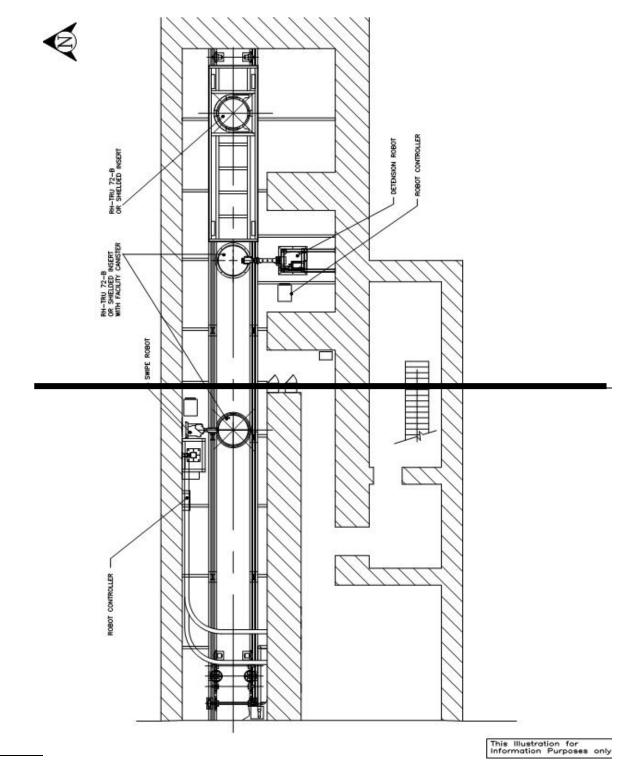


Figure A1-17c RH Canister Transfer Cell Storage Area

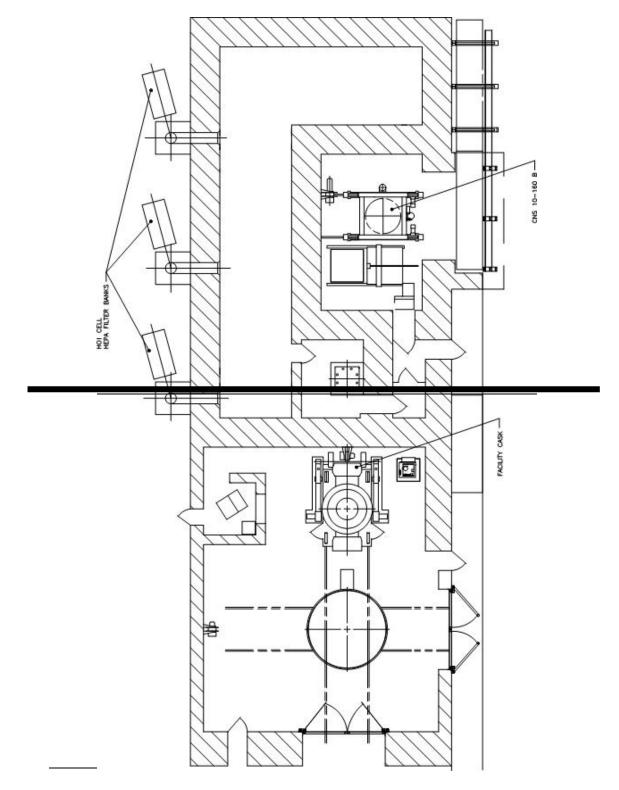


Figure A1-17d RH Facility Cask Loading Room Storage Area

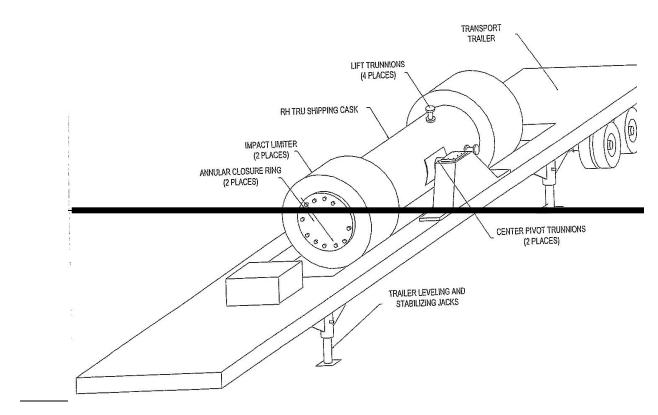


Figure A1-18 RH-TRU 72-B Shipping Cask on Trailer

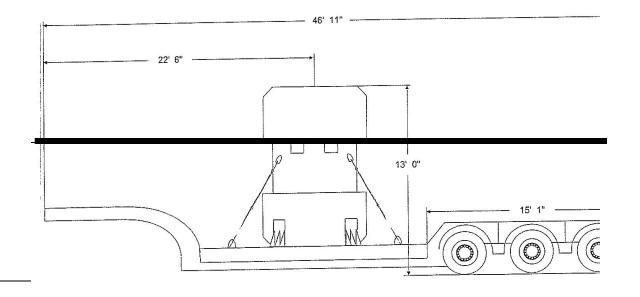
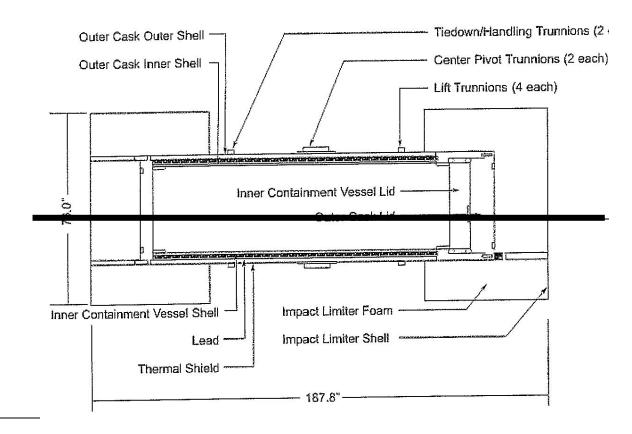


Figure A1-19 CNS 10-160B Shipping Cask on Trailer



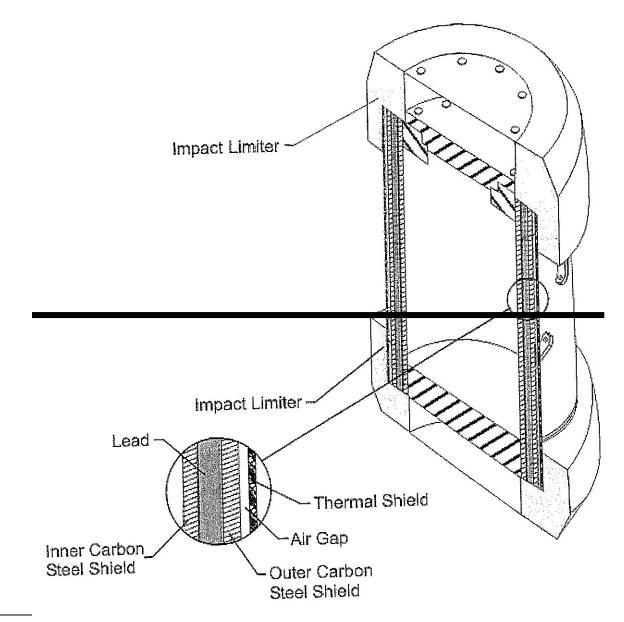


Figure A1-21 CNS 10-160B Shipping Cask for RH Transuranic Waste (Schematic)

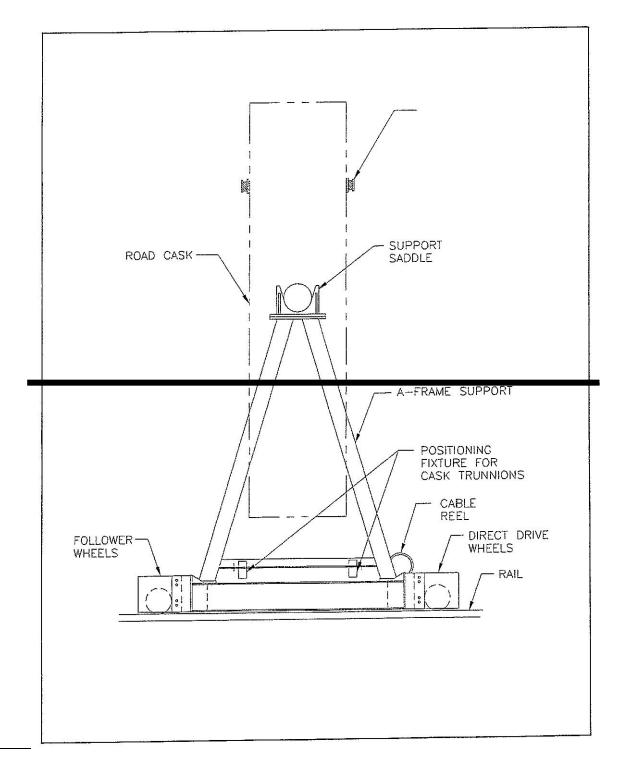
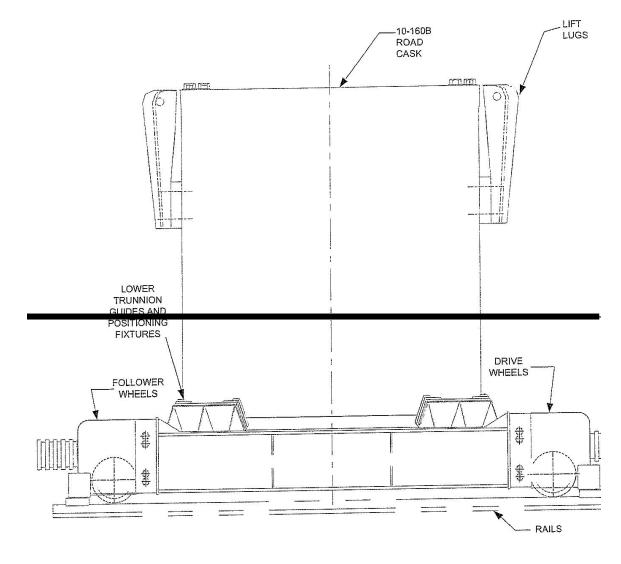
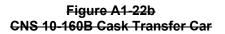


Figure A1-22a RH-TRU 72-B Cask Transfer Car



This Illustration for Information Purposes Only



71

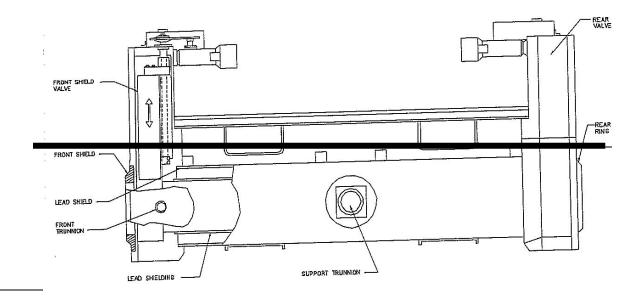


Figure A1-23 RH Transuranic Waste Facility Cask

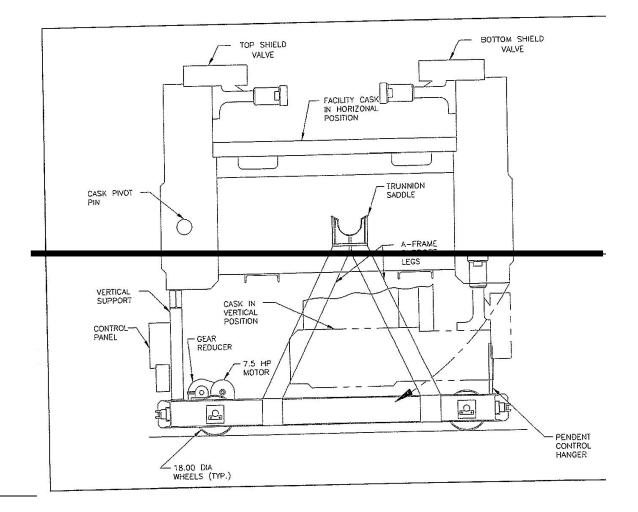
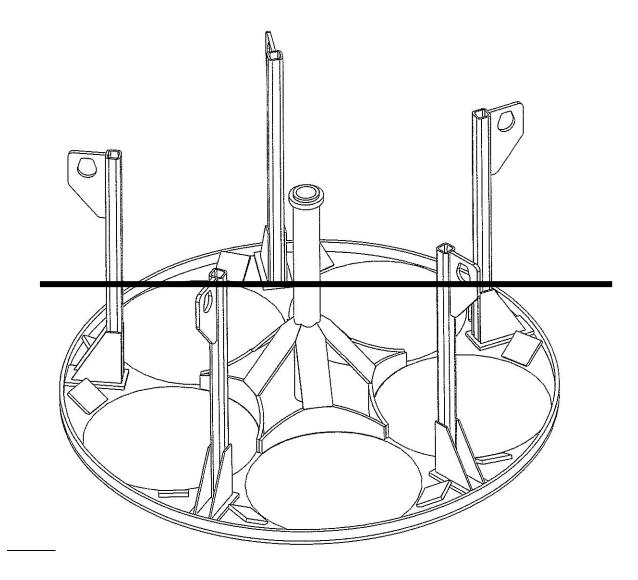
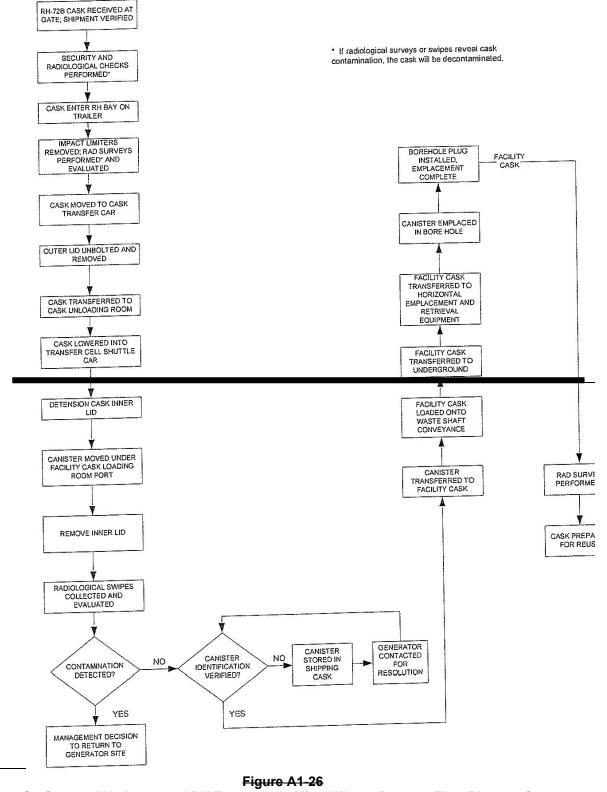


Figure A1-24 RH Facility Cask Transfer Car (Side View)





Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for RH-TRU 72-B Shipping Cask

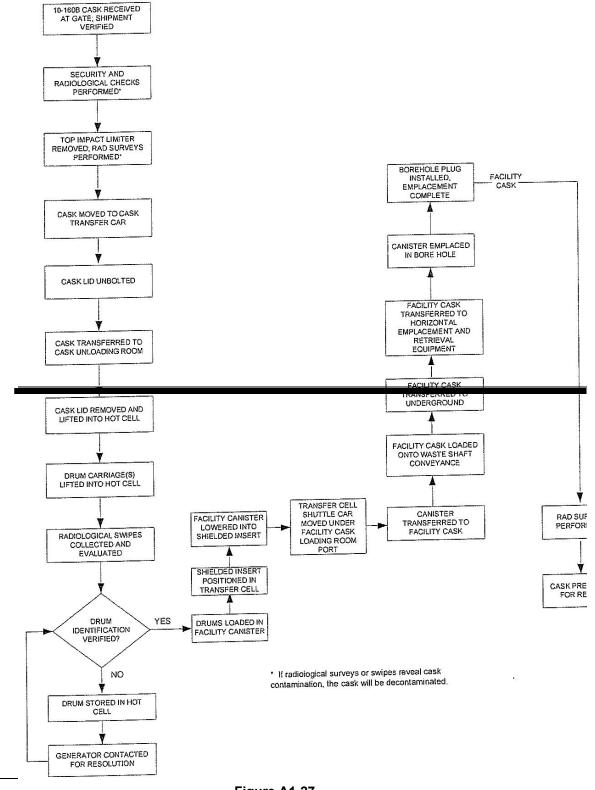


Figure A1-27 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for CNS 10-160B Shipping Cask

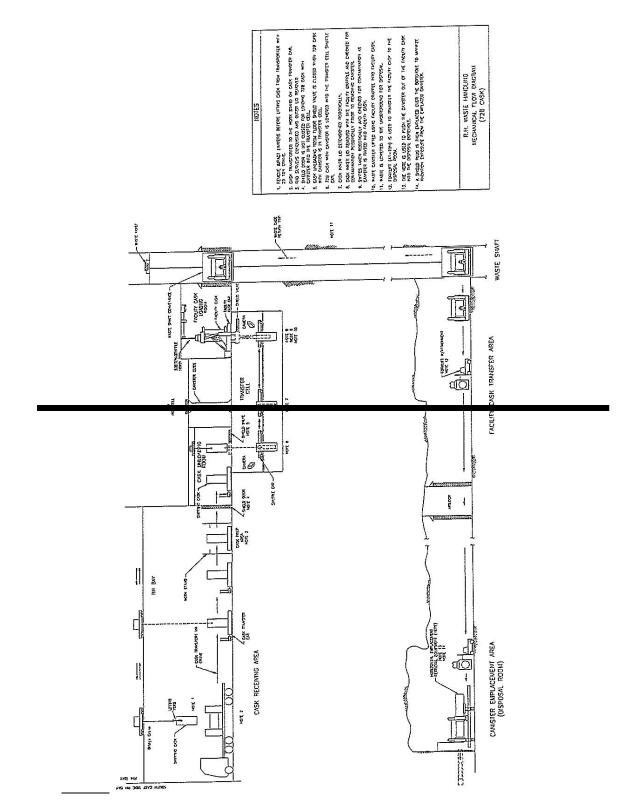


Figure A1-28 Schematic of the RH Transuranic Mixed Waste Process for RH-TRU 72-B Shipping Cask

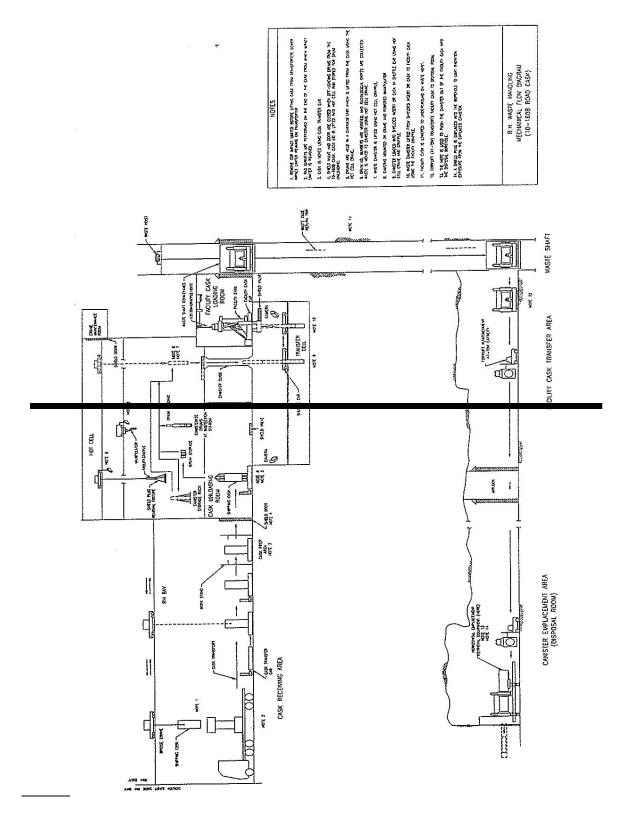


Figure A1-29 Schematic of the RH Transuranic Mixed Waste Process for CNS 10-160B Shipping Cask

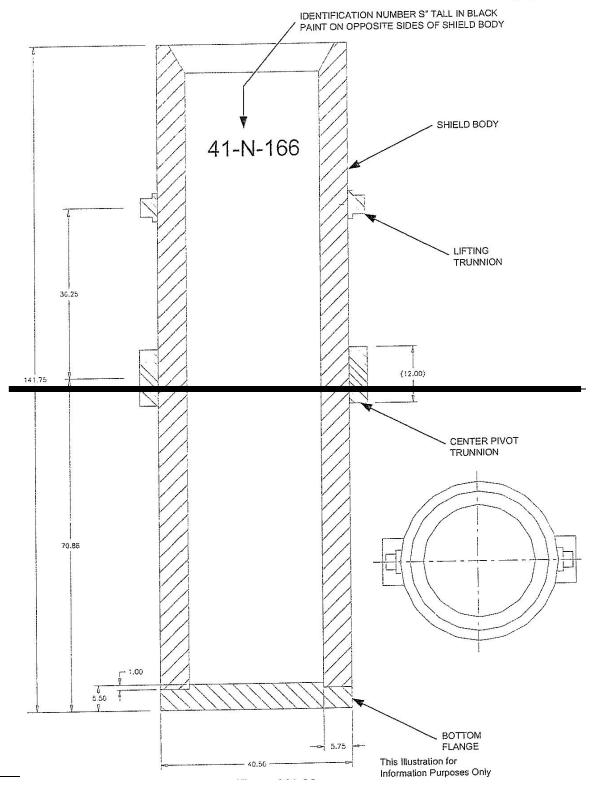


Figure A1-30 RH Shielded Insert Assembly

79

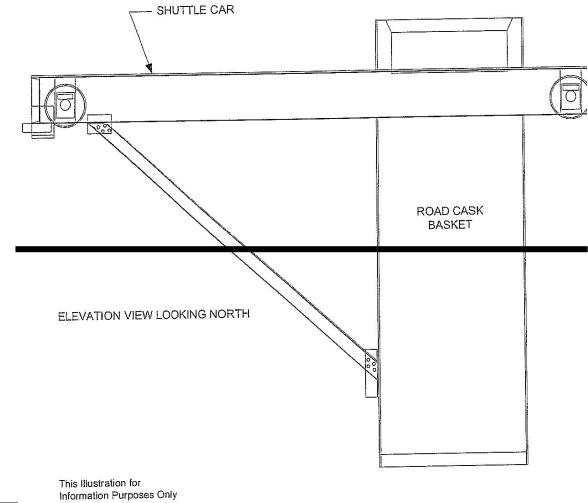
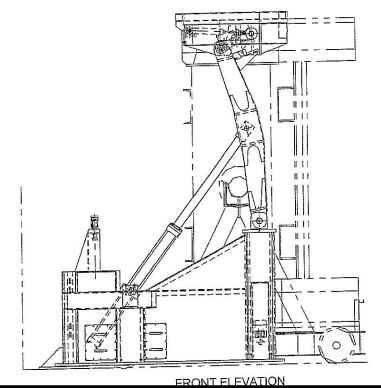
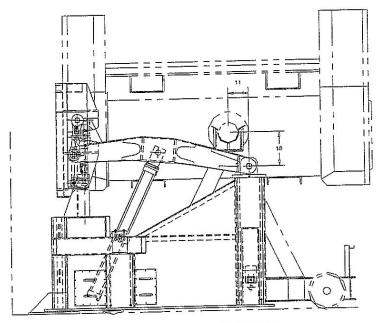


Figure A1-31 Transfer Cell Shuttle Car



CASK VERTICAL



FRONT ELEVATION CASK HORIZONTAL

This Illustration for Information Purposes Only

Figure A1-32 Facility Rotating Device

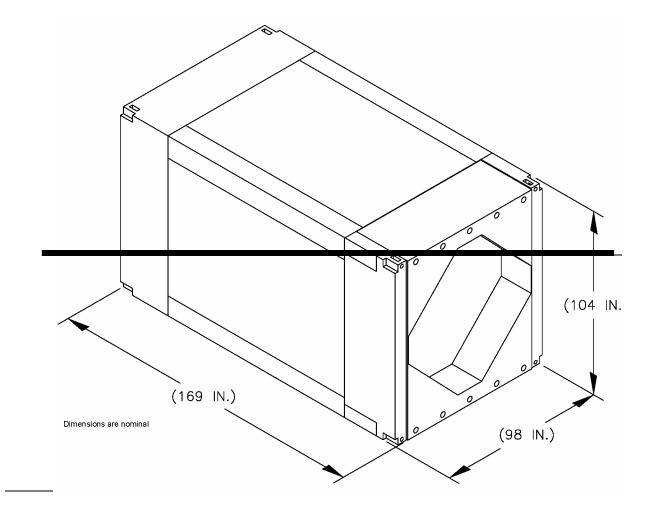


Figure A1-33 Typical TRUPACT-III

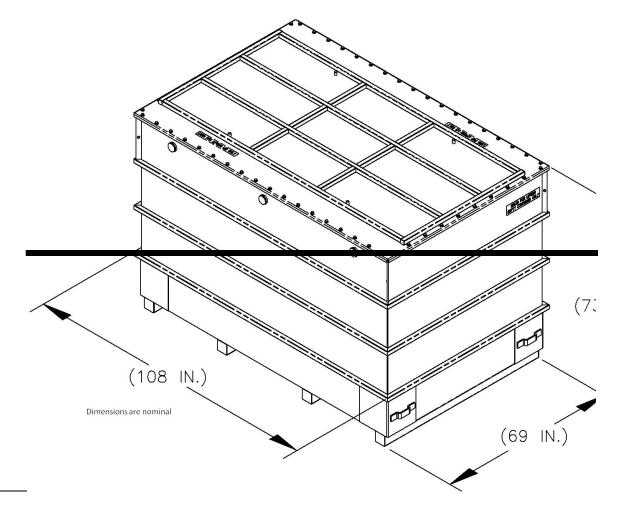


Figure A1-34 Typical Standard Large Box 2

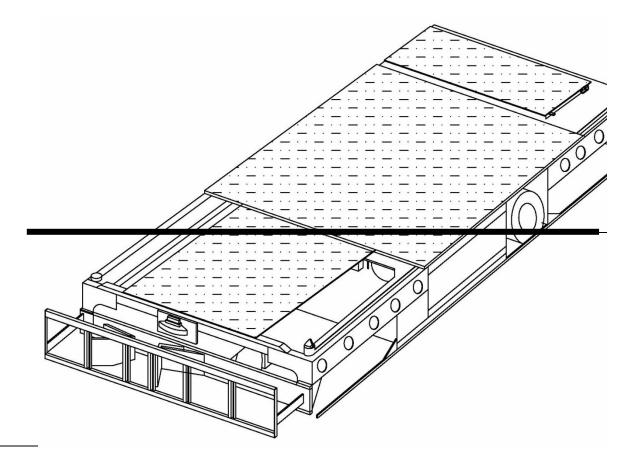


Figure A1-35 Typical Yard Transfer Vehicle

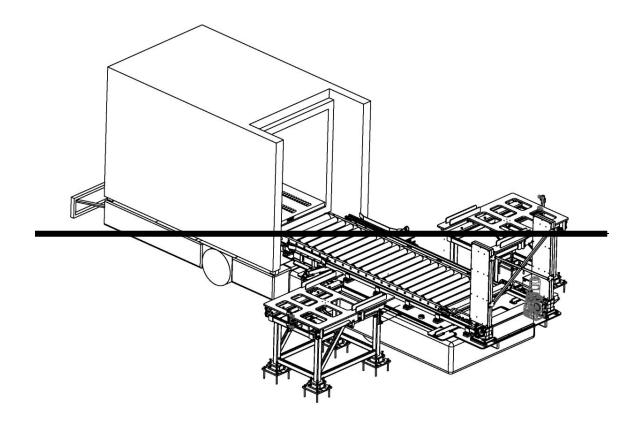
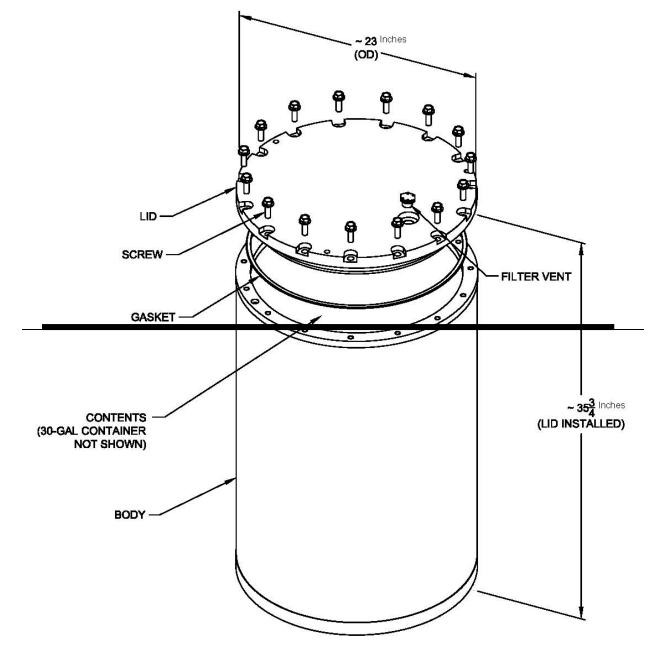


Figure A1-36 Payload Transfer Station

85



1 2 3

Figure A1-37 Typical Shielded Container

ATTACHMENT A2 GEOLOGIC REPOSITORY

ATTACHMENT A2

GEOLOGIC REPOSITORY

TABLE OF CONTENTS

A2-1	Description of the Geologic Repository	3
A2-2	Geologic Repository Design and Process Description A2-2a Geologic Repository Design and Construction A2-2a(1) CH TRU Mixed Waste Handling Equipment A2-2a(2) Shafts A2-2a(3) Subsurface Structures A2-2a(4) RH TRU Mixed Waste Handling Equipment	4 5 7 8 15
	A2-2b Geologic Repository Process Description	15
A2-3	Waste Characterization	18
A2-4	Treatment Effectiveness	18
A2-5	Maintenance, Monitoring, and Inspection A2-5a Maintenance A2-5a(1) Ground-Control Program A2-5b Monitoring A2-5b(1) Groundwater Monitoring A2-5b(2) Geomechanical Monitoring A2-5b(2)(a) Description of the Geomechanical Monitoring System A2-5b(3) Volatile Organic Compound Monitoring	18 18 18 19 19 21
	A2-5c Inspection	21
Refere	nces	21

LIST OF TABLES 1 Table Title 2 3 Table A2-1 4 CH TRU Mixed Waste Handling Equipment Capacities Table A2-2 Instrumentation Used in Support of the Geomechanical Monitoring System 5 Table A2-3 **RH TRU Mixed Waste Handling Equipment Capacities** 6 7 8 LIST OF FIGURES 9 **Title** 10 Figure Figure A2-1 Repository Horizon 11 Figure A2-2 Spatial View of the Miscellaneous Unit and Waste Handling Facility 12 Figure A2-3 Facility Pallet for Seven-Pack of Drums 13 Figure A2-5 Typical Backfill Sacks Emplaced on Drum Stacks 14 Figure A2-5a Potential MgO Emplacement Configurations 15 Figure A2-6 Waste Transfer Cage to Transporter 16 Figure A2-7 Push-Pull Attachment to Forklift to Allow Handling of Waste Containers 17 Figure A2-8 Typical RH and CH Transuranic Mixed Waste Container Disposal 18 Configuration 19 Figure A2-9a Underground Ventilation System Airflow 20 Figure A2-9a-NFBUnderground Ventilation System Airflow (with Building 416) 21 Underground Ventilation System Airflow (with SVS) Figure A2-9b 22 Figure A2-11 **Typical Room Barricade** 23 Figure A2-11a Typical Bulkhead 24 Figure A2-12 WIPP Facility Surface and Underground CH Transuranic Mixed Waste 25 Process Flow Diagram 26 Figure A2-12 WIPP Facility Surface and Underground CH Transuranic Mixed Waste 27 Process Flow Diagram (Continued) 28 Figure A2-13 Layout and Instrumentation - As of 1/96 29 Facility Cask Transfer Car (Side View) Figure A2-14 30 Figure A2-15 31 Typical Horizontal Emplacement Equipment Figure A2-15a Typical Horizontal Emplacement Equipment 32 RH TRU Waste Facility Cask Unloading from Waste Shaft Conveyance Figure A2-16 33 Figure A2-17 Facility Cask Installed on the Typical Emplacement Equipment 34 Figure A2-18 Installing Shield Plug 35 Figure A2-19 Shield Plug Supplemental Shielding Plate(s) 36 Figure A2-20 Shielding Layers to Supplement RH Borehole Shield Plugs 37 Figure A2-21 Shield Plug Configuration 38 39

40

1

2

ATTACHMENT A2

GEOLOGIC REPOSITORY

3 A2-1 Description of the Geologic Repository

Management, storage, and disposal of transuranic (TRU) mixed waste in the Waste Isolation 4 Pilot Plant (WIPP) geologic repository is subject to regulation under 20.4.1.500 New Mexico 5 Administrative Code (NMAC). The WIPP is a geologic repository is mined within a bedded salt 6 formation, which is defined in 20.4.1.401-100 NMAC (incorporating Title 40 of the Code of 7 Federal Regulations (CFR) §260.10) as a miscellaneous Miscellaneous unitUnit. As such, 8 HWMUs hazardous waste management units within the repository are eligible for permitting 9 according to 20.4.1.101 NMAC (incorporating 40 CFR §260.10), and are regulated under 10 20.4.1.500 NMAC, (incorporating 40 CFR Part 264, Miscellaneous Units). The underground 11 Hazardous Waste Disposal Units (HWDUs) consist of eight excavated panels, known as Panels 12 1 through 8. Each panel contains seven rooms and two access drifts. A typical disposal panel is 13 depicted in Figure M-42. 14

As required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601), the Permittees shall ensure

that the environmental performance standards for a miscellaneous Miscellaneous unit Unit,

17 which are applied to the Underground <u>underground Hazardous Waste Disposal Units</u>

18 (HWDUs)<u>HWDUs</u> in the geologic repository, will beare met.

¹⁹ The Disposal Phase will consist of receiving contact-handled (**CH**) and remote-handled (**RH**)

20 TRU mixed waste shipping containers, unloading and transporting the waste containers to the

²¹ Underground <u>underground</u> HWDUs, emplacing the waste in the <u>Underground underground</u>

HWDUs, and subsequently achieving closure of the Underground underground HWDUs in

23 compliance with applicable State <u>state</u> and Federal <u>federal</u> regulations.

The WIPP geologic repository is mined within a 2,000-feet (ft) (610-meters (m))-thick-bedded-

salt formation called the Salado Formation, which is 2,000 feet (ft) (610 meters (m)) thick. The

²⁶ Underground <u>underground</u> HWDUs (miscellaneous units) are located <u>approximately</u> 2,150 ft

27 (655 m) beneath the ground surface. TRU-<u>Transuranic</u> mixed waste management activities

underground will be confined to the southern portion of the 120-acre (48.6 hectares <u>48.6-</u>

²⁹ <u>hectare</u>) mined area during the Disposal Phase. During the <u>ten-year</u> term of this Permit,

disposal of TRU mixed waste will occur only is authorized in the HWDUs designated as Panels 5

through<u>7 and</u> 8 and in any currently active panel (See <u>see</u> Figure <u>M-43</u>A2-1). RH TRU mixed
 waste disposal began in Panel 4. The Permittees may also request in the future a Permit to

waste disposal began in Panel 4. The Permittees may also request in the future a Permit to allow disposal of containers of TRU mixed waste in the areas designated as Panels 9 and 10 in

allow disposal of containers of TRU mixed waste in the areas designated as Panels 9 and 10 in
 Figure A2-1. This Permit, during its 10-year term, authorizes the excavation of Panels 6 through

Figure A2-1. This Permit, during its 10-year term, authorizes the excavation of Panels 6 through 10 and the disposal of waste in Panels 1 through 8. In the future, the Permittees may request

Permit modifications to allow disposal of TRU mixed waste in other areas of the underground.

- 37 one of which may be Panel 10.
- Panels 1 through 8 will-consist of seven rooms and two access drifts each. Panels 9 and 10
- ³⁹ have yet to be designed. Access drifts connect the rooms and have the same cross section (see

40 Section A2-2a(3)). The closure system installed in-<u>for</u>each HWDU₁ after it is filled will prevent

- anyone from entering the HWDU and will restrict ventilation airflow. The point of compliance for
- 42 air emissions from the <u>Underground underground</u> is defined in Permit Attachment N (Volatile
- 43 Organic Compound Monitoring Plan). The point of compliance is the location where the

1 concentration of volatile organic compounds (**VOCs**) in the air emissions from the Underground

² <u>underground</u> HWDUs will be measured and then compared to the VOC action levels (10⁻⁵ for

carcinogens and HI<u>Hazard Index</u>>1 for non-carcinogens) as required by Permit Part 4, Section
 4.6.2.3.

Four shafts connect the underground area with the surface. The Waste Shaft Conveyance 5 headframe and hoist are located within the Waste Handling Building (WHB) and will beare used 6 to transport containers of TRU mixed waste, equipment, and materials to the repository horizon. 7 8 The waste-Waste hoist Hoist can also be used to transport personnel. The Air Intake Shaft and the Salt Handling Shaft provide ventilation to all areas of the mine except for the Waste Shaft 9 Station. This area is ventilated by the Waste Shaft itself. The Salt Handling Shaft is also used to 10 hoist mined salt to the surface and serves as the principal personnel transport shaft. The 11 Exhaust Shaft serves as a common exhaust air duct for all areas of the mine. In some cases 12 (such as during mining activities), the Salt Handling Shaft will beis used as an unfiltered exhaust 13 shaft. The Salt Handling Shaft exhaust air will comecomes from the North or Construction 14 Circuits (i.e., areas of the underground that are not contaminated and do not need High-15 Efficiency Particulate Air (**HEPA**) filtration). The relationship between the WIPP surface facility, 16

the four shafts, and the geologic repository horizon is shown on Figure <u>M-44A2-2</u>.

18 The HWDUs identified as Panels 1 through 8 (Figure <u>M-43A2-1</u>) provide room for up to

19 5,244,900 cubic feet (**ft**³) (148,500 cubic meters (\mathbf{m}^3)) of CH TRU mixed waste. The CH TRU 20 mixed waste containers may be stacked up to three high across the width of the room.

Panels 4 through 8 provide room for up to 93,050 ft³ (2,635 m³) of RH TRU mixed waste. RH
<u>Remote-handled</u> TRU mixed waste may be disposed of in up to 730 boreholes per panel,
subject to the limitations in Permit Part 4, Section 4.1.1.2.ii. These boreholes shall beare drilled
on nominal eight-foot centers, horizontally, about mid-height in the ribs of a disposal room. The
thermal loading from RH TRU mixed waste shall not exceed 10 kilowatts per acre when
averaged over the area of a panel, as shown in Permit Attachment A3, plus 100 feet of each of
a Panel's panel's adjoining barrier pillars.

The WIPP facility is located in a sparsely populated area with site conditions favorable to isolation of TRU mixed waste from the biosphere. Geologic and hydrologic characteristics of the site related to its TRU mixed waste isolation capabilities are discussed in Addendum L1 of the WIPP Hazardous Waste Facility Permit Amended Renewal Applications (DOE, 2009, 2020).

32 Hazard prevention programs are described in this Permit Attachment. Contingency and

emergency response actions to minimize impacts of unanticipated events, such as

³⁴ spills<u>releases of TRU mixed waste</u>, are described in Permit Attachment D. The closure plan for

the WIPP facility is described in Permit Attachment G.

36 A2-2 Geologic Repository Design and Process Description

37 A2-2a Geologic Repository Design and Construction

38 <u>Compliance with the Permit ensures operations at The the WIPP facility are, when operated in</u>

compliance with the Permit, will ensure safe operations and be protective of human health and
 the environment.

As a part of the design validation process, geomechanical tests were conducted in SPDV-Site

42 and Preliminary Design Validation test rooms. During the tests, salt creep rates were measured.

- Separation of bedding planes and fracturing were also observed. Consequently, a ground-
- 2 control strategy was implemented. The ground-control program at the WIPP facility mitigates the
- 3 potential for roof or rib falls and maintains normal excavation dimensions, as long as access to
- 4 the excavation is possible.

5 A2-2a(1) CH TRU Mixed Waste Handling Equipment

⁶ The following are the major pieces of equipment used to manage CH TRU waste in the geologic

7 repository. A summary of equipment capacities, as required by 20.4.1.500 NMAC is included in

8 Table A2-1.

9 Facility Pallets

- ¹⁰ The facility pallet is a fabricated steel unit designed to support 7<u>seven</u>-packs, 3<u>three</u>-packs, or
- 11 4<u>four</u>-packs of drums, standard waste boxes (SWBs), ten-drum overpacks (TDOPs), or a
- standard large box 2 (SLB2), and has a rated load of 25,000 pounds (lbs.) (11,430 kilograms
- 13 (kg)). The facility pallet will accommodates up to four 7seven packs, four 3three packs, or four
- 14 <u>four-packs of drums;</u> two 3three-packs of shielded containers, <u>;</u> four 4-packs of drums, four
- SWBs (in two stacks of two units), two TDOPs, or one SLB2. Loads are secured to the facility
- pallet during transport to the emplacement area. Facility pallets are shown in Figure M-21A2-3.
- Fork pockets in the side of the pallet allow the facility pallet to be lifted and transferred by forklift
- to prevent direct contact between TRU mixed waste containers and forklift tines. This
- arrangement reduces the potential for puncture accidents. WIPP facility operational documents
 define the operational load of the facility pallet to ensure that the rated load of a facility pallet is
- not exceeded.

22 <u>Backfill</u>

- ²³ Magnesium oxide (**MgO**) will beis used as a backfill in order to provide chemical control over the
- solubility of radionuclides in order to comply with the requirements of 40 CFR §191.13. The
- ²⁵ MgO backfill will beis purchased prepackaged packaged appropriately in the proper containers
- ²⁶ for emplacement in the underground. Purchasing prepackaged backfill eliminates handling and
- 27 placement problems associated with bulk materials, such as dust creation. In addition,
- 28 prepackaged materials will be easier to emplace, thus reducing potential worker exposure to
- ²⁹ radiation. <u>Magnesium oxide is benign; therefore, </u>Sshould a backfill container <u>package</u> be
- ³⁰ breached, MgO is benign and cleanup is simple. N<u>n</u>o hazardous waste would result from a spill
- of backfill.
- 32 The MgO backfill will be managed in accordance with Specification D-0101 (MgO Backfill
- 33 Specification) and WP05-WH1025 (CH Waste Downloading and Emplacement). These
- ³⁴ documents are kept on file at the WIPP facility by the Permittees.
- ³⁵ Backfill will be handled in accordance with standard operating procedures. Typical <u>backfill</u>
- ³⁶ emplacement configurations are shown in Figures <u>M-45A2-5 and A2-5a</u>. Some emplacement
- configurations may include the use of MgO emplacement racks, as shown in Figure <u>M-45A2-5a</u>.
- 38 The backfill emplacement process does not require additional operational considerations (e.g.,
- 39 ventilation flow and control) beyond those required for TRU mixed waste emplacement.
- 40 Quality control will be provided within standard operating procedures to record that the correct
- ⁴¹ number of sacks are placed and that the condition of the sacks is acceptable.

- Backfill placed in this manner is protected until exposed when sacks are broken during creep
- 2 closure of the room and compaction of the backfill and waste. Backfill in sacks utilizes existing
- 3 techniques and equipment and eliminates operational problems such as dust creation and
- 4 introducing additional equipment and operations into waste handling areas. There are no mine
- 5 operational considerations (e.g. ventilation flow and control) when backfill is placed in this
- 6 manner.

7 The Waste Shaft Conveyance

- 8 The hoist systems in the shafts and all-<u>related</u> shaft furnishings are designed to resist the
- 9 dynamic forces of the hoisting system and to withstand a design-basis earthquake (DBE) of 0.1
- 10 g. Appendix D2 of the WIPP RCRA Part B Permit Application (DOE, 1997) provided an
- engineering design-basis earthquake report, which provides the basis for seismic design of
- 12 WIPP facility structures. The waste <u>Waste hoist Hoist</u> is equipped with a control system that will
- detects malfunctions or abnormal operations of the hoist system (such as overtravel, overspeed,
- power loss, circuitry failure, or starting in a wrong direction) and will-triggers an alarm that
- automatically shuts down the hoist.
- 16 The waste <u>Waste hoist Hoist</u> moves the Waste Shaft Conveyance and is a multirope, friction-
- 17 type hoist. A counterweight is used to balance the waste Waste shaft Shaft
- 18 conveyance<u>Conveyance</u>. The waste <u>Waste shaft Shaft conveyance Conveyance</u> (outside
- dimensions) is 30 ft (9 m) high by 10 ft (3 m) wide by 15 ft (4.5 m) deep and can carry a payload
- of 45 tons (40,824 kilograms (kg)). During loading and unloading operations, it is steadied by
- fixed guides. The hoist's maximum rope speed is 500 ft (152.4 m) per minute.
- The Waste Shaft hoist system has two sets of brakes, with two units per set, plus a motor that is normally used to stop the hoist. The brakes are designed so that either set, acting alone, can stop a fully loaded conveyance under all-emergency conditions.
- 25 The Underground Waste Transporter
- 26 The underground waste transporter is a commercially available diesel-powered tractor. The
- trailer was designed specifically for the WIPP <u>facility</u> for transporting facility pallets from the
- 28 waste <u>Waste shaft Shaft conveyance Conveyance</u> to the <u>Underground underground HWDU in</u>
- ²⁹ use. This transporter is shown in Figure <u>M-46A2-6</u>.

30 Underground Forklifts

- 31 CH-<u>Contact-handled</u> TRU mixed waste containers loaded on slipsheets will be<u>are</u> removed from
- the facility pallets using forklifts with a push-pull attachment (Figure M-47A2-7) attached to the
- forklift-truck front carriage. The push-pull attachment grips the edge of the slipsheet (on which the waste containers sit) to pull the containers onto the platen. After the forklift moves the waste
- the waste containers sit) to pull the containers onto the platen. After the forklift moves the was containers to the emplacement location, the push-pull attachment pushes the containers into
- position. The use of the push-pull attachment prevents direct contact between waste containers
- and forklift tines. SWBs_Standard waste boxes and TDOPs may also be removed from the
- facility pallet by using forklifts equipped with special adapters for these containers. These
- ³⁹ special adapters will prevent direct contact between SWBs or TDOPs and forklift tines. In
- addition, the low clearance forklift that is used to emplace MgO may be used to emplace waste
- 41 if necessary.

A forklift will be sugar to offload the SLB2 from the underground transporter and emplace the 1 2 waste container in the waste stack.

A2-2a(2) Shafts 3

The WIPP facility uses four shafts: the Waste Shaft, the Salt Handling Shaft, the Air Intake 4

Shaft, and the Exhaust Shaft. These shafts are vertical openings that extend from the surface to 5

the repository level. 6

The Waste Shaft is located beneath the WHB and is-varies from 19 to 20 ft (5.8 to 6.1 m) in 7 diameter. The Salt Handling Shaft, located north of the Waste Shaft beneath the salt handling 8 headframe, is-varies from 10 to 12 ft (3 to 3.6 m) in diameter. Salt mined from the repository 9 horizon is removed through the Salt Handling Shaft. The Salt Handling Shaft is the main 10 personnel and materials hoist and also serves as a secondary-supply air duct for the 11 underground areas. The Air Intake Shaft, northwest of the WHB, varies in diameter from 16 ft 7 12 in inches (in) (4.51 m) to 20 ft 3 in (6.19 m) and is the primary source of fresh air underground. 13 The Exhaust Shaft, east of the WHB, is varies from 14 to 15 ft (4.3 to 4.6 m) in diameter and 14 serves as the exhaust duct for the underground air. In some cases, the Salt Handling Shaft may 15 be used as an unfiltered exhaust shaft to ventilate areas of the underground that do not need 16 filtration. 17

Openings excavated in salt experience closure because of salt creep, for time-dependent 18

deformation at constant load). The closure affects the design of all of the openings discussed in 19

this section. Underground excavation dimensions, therefore, are nominal, because they change 20

with time. The unlined portions of the shafts have larger diameters than the lined portions, which 21

allows for closure caused by salt creep. Each shaft includes a shaft collar, a shaft lining, and a 22

shaft key section. Permit Attachment G2 describes each shaft in detail including shaft 23

construction, location of shaft liners, shaft keys, water collection rings, and tubes. The Final 24

Design Validation Report in Appendix D1 of the WIPP RCRA Part B Permit Application (DOE, 25

1997) discusses the shafts and shaft components in greater detail. 26

The reinforced-concrete shaft collars extend from the surface to the top of the underlying 27

consolidated sediments. Each collar serves to retain adjacent unconsolidated sands and soils 28

and to prevent surface runoff from entering the shafts. The shaft linings extend from the base of 29

the collar to the top of the salt beds approximately 850 ft (259 m) below the surface. Grout 30

injected behind the shaft lining retards water seeping into the shafts from water bearing 31

formations, and the liner is designed to withstand the natural water pressure associated with 32

these formations. The shaft liners are concrete, except in the Salt Handling Shaft, where a steel 33

- shaft liner has been grouted in place. 34
- The shaft key is a circular reinforced concrete section emplaced in each shaft below the liner in 35

the base of the Rustler and extending about 50 ft (15 m) into the Salado. The key functions to 36

resist lateral pressures and assures that the liner will not separate from the host rocks or fail 37

under tension. This design feature also aids in preventing the shaft from becoming a route for 38

- groundwater flow into the underground facility. 39
- On the inside surface of each shaft, excluding the Salt Handling Shaft, there are three water-40
- collection rings: one just below the Magenta, one just below the Culebra, and one at the 41
- lowermost part of the key section. These collection rings collect water that may seep into the 42
- shaft through the liner. The Salt Handling Shaft has a single water collection ring in the lower 43

part of the key section. Water collection rings are drained by tubes to the base of the shafts
 where the water is accumulated.

³ WIPP sShafts and other underground facilities are, for all practical purposes, dry. Minor

4 quantities of water (which accumulate in some shaft sumps) are insufficient to affect the waste

disposal area. This water is collected, brought to the surface, and disposed of in accordance

6 with current standards and regulations.

7 The Waste Shaft is protected from precipitation by the roof of the waste <u>Waste shaft Shaft</u>

8 conveyance <u>Conveyance</u> headframe tower. The Exhaust Shaft is configured at the top with a 14

9 ft- (4.3 m-) diameter duct that diverts air into the exhaust filtration system or to the atmosphere,

as appropriate. The Salt Handling and Air Intake Shaft collars are open except for the

11 headframes. Rainfall into the shafts is evaporated by ventilation air.

The waste-Waste hoist Hoist system in the Waste Shaft and all-Waste Shaft furnishings are 12 designed to resist the dynamic forces of the hoisting system, which are greater than the seismic 13 forces on the underground facilities. In addition, the Waste Shaft conveyance Conveyance 14 headframe is designed to withstand the design basis earthquake (DBE)DBE. Maximum 15 operating speed of the hoist is 500 ft (152.4 m) per minute. During loading and unloading 16 operations, the waste Waste hoist Hoist is steadied by fixed guides. The waste Waste hoist 17 Hoist is equipped with a control system that will detect malfunctions or abnormal operations of 18 the hoist system, such as overtravel, overspeed, power loss, or circuitry failure. The control 19 response is to annunciate the condition and shut the hoist down. Operator response is required 20 to recover from the automatic shutdown. Waste hoist Hoist Operation is continuously monitored 21 by the <u>Central Monitoring System</u> (CMS). A battery-powered FM-transmitter/receiver allows 22 communication between the hoist conveyanceWaste Shaft Conveyance and the hoist house. 23 The waste-Waste hoist Hoist has two pairs of brake calipers acting on independent brake paths. 24

The hoist motor is normally used for braking action of the hoist. The brakes are used to hold the hoist in position during normal operations and to stop the hoist under emergency conditions. Each pair of brake calipers is capable of holding the hoist in position during normal operating conditions and stopping the hoist under emergency conditions. In the event of power failure, the brakes will set automatically.

The waste <u>Waste hoist Hoist</u> is protected by a fixed automatic fire suppression system. Portable fire extinguishers are also provided on the hoist floor and in equipment areas.

32 A2-2a(3) Subsurface Structures

The subsurface structures in the repository, located <u>at approximately</u> 2,150 ft (655 m) below the surface, include the HWDUs, the northern experimental areas, and the support areas. Appendix D3 of the WIPP RCRA Part B Permit Application (DOE, 1997) provided details of the

underground layout. Figure <u>M-48</u>A2-8 shows the proposed waste emplacement configuration for
 the HWDUs.

The status of <u>important designated</u> underground equipment, including fixed fire-protection systems, the ventilation system, and contamination_detection systems, <u>will beare</u> monitored by a <u>central monitoring systemCMS</u>, located in the Support Building adjacent to the WHB. Backup

41 power will be provided as discussed below. The subsurface support areas are constructed and

42 maintained to conform to Federal <u>federal</u> mine safety codes.

1 Underground Hazardous Waste Disposal Units (HWDUs)

2 During the terms of this and the preceding Permit, the <u>final_TRU</u> mixed waste volumes

3 emplaced in the repository will not exceed the maximum capacities listed in Permit Part 4, Table

4 4.1.1 for each HWDU. CH-Contact-handled TRU mixed waste will be disposed of in

5 Underground <u>underground</u> HWDUs identified as Panels 1 through 8. RH <u>Remote-handled</u> TRU

6 mixed waste may be disposed of in Panels 4 through 8.

7 Main entries and cross cuts in the repository provide access and ventilation to the HWDUs. The

8 main entries link the shaft pillar/service area with the TRU mixed waste management area and

⁹ are separated by pillars. Each of the Underground <u>underground</u> HWDUs labeled Panels 1

through 8 will have seven rooms. The locations of these HWDUs are shown in Figure M-43A2-

4. The rooms will have nominal dimensions of 13 ft (4.0 m) high by 33 ft (10 m) wide by 300 ft

12 (91 m) long and will beare supported separated by 100 ft- (30 m-) wide pillars.

As currently planned, future Permits may allow disposal of TRU mixed waste containers in two 13 additional panels, identified asone of which may be Panels 9 and 10. Disposal of TRU mixed 14 waste in Panels 9 and 10 is prohibited under this Permit. If TRU mixed waste volumes disposed 15 of in the eight panels fail to reach the stated design capacity, the Permittees may request a 16 Permit modification to allow disposal of TRU mixed waste in the four main entries and crosscuts 17 adjacent to the waste panels (referred to as the disposal area access drifts). These areas 18 access drifts are labeled Panels 9 and Panel 10 in Figure M-43A2-1. A permit modification or 19 future permit modification request would be submitted describing the condition of those drifts 20 and the controls exercised for personnel safety and environmental protection while disposing of 21 waste in these areas access drifts. These areas access drifts have the following nominal 22 dimensions: 23 The E-140 waste transport route south of the Waste Shaft Station is mined to be 24

25 ft wide nominally and its height ranges from about 14 ft to 20 ft-

- The W-30 waste transport route south of S-700 is mined to be 20 ft wide nominally and its height <u>will beis</u> mined to at least 14 ft.
 - <u>All otherOther</u> drifts that are part of the waste transport route will beare at least 20 ft wide and 14 ft high to accommodate waste transport equipment.
- Other drifts (i.e. mains and cross-cuts) vary in width and height according to their function typically ranging from 14 ft to 20 ft wide and 12 ft to 20 ft high.
- The layout of these excavations is shown on Figure <u>M-43A2-1</u>.

33 <u>Underground Facilities Ventilation System</u>

25

28

29

The underground facilities ventilation system will provide provides a safe and suitable

environment for underground operations during normal WIPP facility operations. The

underground system is designed to provide control of potential airborne contaminants in the

event of an accidental release or an underground fire.

The underground is divided into specific areas that are supported by different ventilation flows

referred to as ventilation circuits. Consequently, the underground ventilation system is

1 comprised of four separate circuits, as designated on Figure <u>M-49A2-9a</u>: one serving the

2 northern experimental areas (North Circuit), one serving the construction areas (Construction

3 Circuit), one serving the waste disposal areas (Disposal Circuit), and one serving the waste

4 <u>Waste shaft Shaft station Station</u> area (Waste Shaft Station Circuit). The <u>air from the four</u>

5 circuits are is recombined near the bottom of the Exhaust Shaft, which serves as a common

exhaust route from the underground level to the surface. In some cases, the Salt Handling Shaft

7 may be used as an unfiltered exhaust shaft (Figure M-50A2-9b) to ventilate areas of the

8 underground that do not need filtration.

9 <u>Underground Ventilation System Description</u>

The underground ventilation system consists of centrifugal exhaust fans, two identical HEPA-10 filter assemblies arranged in parallel, isolation dampers, a filter bypass arrangement, two skid-11 mounted HEPA-filter assemblies arranged in parallel, and associated ductwork. The fans, 12 connected by the ductwork to the underground exhaust shaft so that they can independently 13 14 draw air through the Exhaust Shaft, are divided into three groups. One group consists of three main exhaust fans, two of which are utilized to provide the nominal air flowairflow of 425,000 15 standard ft³ per minute (scfm) throughout the WIPP facility underground during normal 16 (unfiltered) operation. One main fan may be operated in the alternate mode to provide 260,000 17 scfm underground ventilation flow. These fans are located near the Exhaust Shaft. The second 18 group consists of three filtration fans, and each can provide 60,000 scfm of air flowairflow. 19 These fans, located at the Exhaust Filter Building, can be operated in the filtration mode, where 20 exhaust is diverted through HEPA filters, or in the reduced or minimum ventilation mode, where 21 air is not drawn through the HEPA filters. The third group consists of two skid-mounted filtration 22 fans and HEPA-filter assemblies, each of which can provide approximately 23,000 scfm of air 23 flowairflow. The skid-mounted filtration fan and HEPA-filter assemblies, referred to as the 24 Interim Ventilation System (IVS) located south of the Exhaust Filter Building, are only operated 25 in filtration mode, where exhaust is diverted through HEPA filters. In addition to the surface fans, 26 an underground fan has been installed to ventilate uncontaminated areas in the North and 27 Construction Circuits. This system is referred to as the Supplemental Ventilation System (SVS) 28 and will be subset used in conjunction with IVS (as shown in Figure M-50A2-9b). When this fan is 29 operating, the Salt Shaft will-serves as an unfiltered exhaust shaft for the North and 30 Construction Circuits. A portion of the airflow provide provided by the SVS to the Construction 31 Circuit can is also be used to provide fresh air to the Disposal Circuit, if needed. In this case, the 32 air from the Disposal Circuit will continue to be exhausted through the HEPA filtration system. 33

The underground mine ventilation is designed to supply sufficient quantities of air to all areas of the repository. During normal operating mode (simultaneous mining and waste emplacement operations), approximately 140,000 actual ft³ (3,962 m³) per min can be supplied to the panel area. This quantity is necessary in order to<u>can</u> support the level of activity and the pieces of diesel equipment that are expected to be in operation.

At any given time during waste emplacement activities, there may be significant activities in 39 multiple rooms in a panel. For example, one room may be receiving CH TRU mixed waste 40 containers, another room may be receiving RH TRU mixed waste canisters, and the drilling of 41 RH TRU mixed waste emplacement boreholes may be occurring in another room. The 42 remaining rooms in a panel will either be completely filled with waste; be idle, awaiting waste 43 handling operations; or being prepared for waste receipt. A minimum ventilation rate of 35,000 44 standard ft³ (990 m³) per minute will beis maintained in each active room when waste disposal 45 is taking place and workers are present in the room. This Based on calculations in Appendix D9 46

- of the RCRA Part B Permit Application (DOE, 1997), this quantity of air is required to support
- 2 the numbers and types of diesel equipment that are expected to be in operation in the area, and
- 3 to support protect the underground waste handling personnel working in that area an active
- 4 <u>disposal room</u>. The remainder of the air is needed in order to account for air leakage through
- 5 inactive rooms. If an active room ventilation rate of 35,000 scfm cannot be met, actions as
- 6 described in Permit Attachment O shall be taken during waste disposal operations when
- 7 workers are present.

Air will beis routed into a panel from the intake side. Air is routed through the individual rooms 8 within a panel using any of the following flow control devices: underground bulkheads, brattice-9 cloth barricades, bulkheads with doors or air regulators. Bulkheads are constructed by erecting 10 framing of rectangular steel tubing and screwing galvanized sheet metal to the framing. 11 Bulkhead members use telescoping extensions that are attached to framing and the salt which 12 adjust to creep. Flexible flashing attached to the bulkhead on one side and the salt on the other 13 completes the seal of the ventilation bulkhead installation. Where controlled airflow is required, a 14 louver-style damper or a slide-gate (sliding panel) regulator is installed on the bulkhead. 15 Personnel access is available through most bulkheads, and vehicular access is possible 16 through selected bulkheads. Vehicle roll-up doors in the panel areas are not equipped with 17 warning bells or strobe lights since these doors are to be used for limited periodic maintenance 18 activities in the return air path. Flow is also controlled using brattice_-cloth barricades. These 19 consist of chain link fence that is bolted to the salt or attached to a structural member and 20 covered with brattice cloth; and are used in instances where the only flow control requirement is 21 to block the air. A brattice-cloth air barricade is shown in Figure M-51A2-11. Ventilation will beis 22 maintained only in all-active rooms within a panel until waste emplacement activities are 23 completed and the panel-closure system is installed. The air will beis routed simultaneously 24 through all-the active rooms within the panel. The filled rooms will beare isolated from the 25 ventilation system, while the active rooms that are actively being filled will-receive a minimum of 26 35,000 scfm of air when workers are present to assure worker safety. If an active room 27 28 ventilation rate of 35,000 scfm cannot be met, actions as described in Permit Attachment O shall be taken during waste disposal operations when workers are present. After all-the rooms 29 within a panel are filled, the panel will be closed using a closure system described Permit 30 Attachment G and Permit Attachment G1. 31

Once a disposal room is filled and is no longer needed for emplacement activities, it will be
 barricaded against entry and isolated from the mine ventilation system. This may be
 accomplished by any of the following: by removing the air regulator bulkhead, closing bulkhead
 doors, constructing chain link/brattice₌ cloth barricades and, if necessary, constructing
 bulkheads at each end. A typical bulkhead is shown in <u>Permit Attachment G1, Appendix G1-</u>
 <u>BFigure A2-11a</u>. There is no requirement for air for these rooms since personnel and/or
 equipment will not be in these areas.

The ventilation path for the waste disposal side is separated from the construction (e.g., mining) side by means of air locks, bulkheads, and salt pillars. A pressure differential is maintained between the construction side and the waste disposal side to ensure that any leakage is towards the disposal side. The pressure differential is produced by the surface fans in conjunction with the underground air regulators.

44 Underground Ventilation Filtration System Description with Buildings 416 and 417

1 The Underground Ventilation Filtration System (**UVFS**) fans, which are part of the New Filter 2 Building (**NFB**) (Building 416), provide enhanced ventilation in the underground, sufficient to

- allow concurrent mining and waste emplacement while in filtration mode <u>(Figure M-52)</u>. The
- 4 UVFS will provide filtered airflow through a surface mounted ventilation and filtration system.
- 5 The intake duct to the surface ventilation and filtration facility is connected to the Exhaust Shaft.
- 6 The exhaust from the underground will be directed to the salt--reduction system located in the
- 7 Salt-Reduction Building (SRB) (Building 417).

Prior to passing through the NFB, air from the Exhaust Shaft may be directed through the SRB, 8 which contains de-dusters, commonly used in the mining industry, and de-misters for salt dust 9 and brine/water mist removal. The salt--reduction system consists of multiple parallel de-dusting 10 units. The exhaust from the de-dusting units is directed to the filter supply manifold and then to 11 the filtration units. The combination of the de-duster and de-mister combination has a water 12 wash--down system that is connected to a water collection, treatment and sludge tank. The 13 outlet of the water collection, treatment, and sludge tank is piped out of the SRB to an 14 evaporative pond. Accumulated water and salt will be characterized and disposed of in 15 accordance with WIPP facility standard operating procedures. 16

¹⁷ Differential<u>-</u>pressure instrumentation<u>. located at each filter bank</u>, will be provided with a high

differential pressure alarm, which is monitored in the CMR. The exhaust from each of the filter

19 banks is directed to a plenum which has a single duct that discharges to the environment

20 through a stack.

33

34

21 <u>Underground Ventilation Modes of Operation</u>

22 The underground ventilation system is designed to perform under three types of operation:

normal (the HEPA exhaust filtration system is bypassed), filtered (the exhaust is filtered through

the HEPA filtration system), if radioactive contaminants are detected or suspected, or a

combined mode in which the air in the Disposal Circuit is filtered and the air in the North and

- 26 Construction Circuits is unfiltered.
- 27 The possible modes of exhaust fan operation are as follows:
- <u>2Two</u> main fans in operation
- <u>4One</u> main fan in operation
- <u>1One</u> filtration fan in filtered operation
- <u>2Two</u> fans in filtered operation (one filtration fan and one IVS fan or two IVS fans)
- **3**<u>Three</u> fans in filtered operation (one filtration fan and two IVS fans)
 - 1<u>One</u> filtration fan in unfiltered operation
 - 2<u>Two</u> filtration fans in unfiltered operation
- 1<u>One</u> main and 1<u>one</u> filtration fan in unfiltered operation

2 3 4

5

7

1

• <u>3Three</u> fans in filtered operation (one filtration fan and two IVS fans exhausting through the Exhaust Shaft) and an underground SVS fan in operation (boosting fresh air into the mine causing the Salt Handling Shaft to serve as an unfiltered exhaust shaft for the North and Construction Circuits)

6 <u>Underground Ventilation Filtration System Modes of Operation with Building 416</u>

The UVFS, which includes the NFB, is designed to perform under two types of operation:
 filtered (the exhaust is filtered through the HEPA filtration system), and bypassed (the HEPA exhaust filtration system is bypassed).

11

12 For UVFS Filtration Mode

- 13 1<u>One</u> exhaust fan
- 2<u>Two</u> exhaust fans
- 3<u>Three</u> exhaust fans
- 4<u>Four</u> exhaust fans
- 1718 For UVFS Bypass Mode
- 19 20

39

40

41

<u>1One</u> to 4<u>four</u> exhaust fans

Under some circumstances (e.g. power outages and maintenance activities), exhaust fan operation may be discontinued for short periods of time.

In the normal mode, two main surface exhaust fans, located near the Exhaust Shaft, will-provide continuous ventilation of the underground areas. In this mode, underground <u>air</u>flows join at the bottom of the Exhaust Shaft before discharge to the atmosphere. However, in some cases, the Salt Handling Shaft may be used as an unfiltered exhaust shaft to ventilate areas of the underground that do not need filtration.

Typically, outside air will beis supplied to the construction areas and the waste disposal areas 28 through the Air Intake Shaft, the Salt Handling Shaft, and access entries. A small quantity of 29 outside air will flows down the Waste Shaft to ventilate the Waste Shaft station Station. The 30 ventilation system is designed to operate with the Air Intake Shaft as the primary source of fresh 31 air. Under these circumstances, sufficient air will beis available to simultaneously conduct all 32 underground operations (e.g., waste handling, mining, experimentation, and support). 33 Ventilation may be supplied by operating fans in the configurations listed in the above 34 description of the ventilation modes. 35

- An underground SVS fan, located in the S-90 drift, provides additional ventilation to the
 underground facility, as needed. The SVS ventilates the following:
 - The North and Construction Circuits, exhausting through the Salt Handling Shaft and
 - The disposal areas of the underground, exhausting through the Exhaust Shaft and

through the filtration system

1

If the nominal flow of 425,000 scfm (12,028 m³/min) is not available (e.g., only one of the main 2 ventilation fans is available), underground operations may proceed: however, the number of 3 4 activities that can be performed in parallel may be limited- depending on the quantity of air available. Ventilation may be supplied by operating one or more of the filtration exhaust fans. To 5 accomplish this, the isolation dampers will be opened, which will permit air to flow from the main 6 exhaust duct to the filter outlet plenum or to the IVS. The filtration fans may also be operated to 7 bypass the HEPA plenum. The isolation dampers of the filtration exhaust fan(s) to be employed 8 will be opened, and the selected fan(s) will be switched on. In this mode, underground 9 operations will be limited, because filtration exhaust fans cannot provide sufficient airflow to 10 support the use of numerous pieces of diesel equipment. 11

If the nominal flow of 425,000 scfm (12,028 m³/min) is not available because the facility is 12 operating in filtration mode, the exhaust air will pass through HEPA-filter assemblies, with 13 14 filtration fans operating (i.e., all-other fans are stopped). This system provides a means for removing the airborne particulates that may contain radioactive and hazardous waste 15 particulates before they are discharged through the exhaust stack to the atmosphere. The 16 filtration mode is activated manually or automatically if the radiation monitoring system detects 17 abnormally high concentrations of airborne radioactive particulates (an alarm is received from 18 the continuous air monitor in the exhaust drift of the active waste panel) or a waste handling 19 incident with the potential for a waste container breach is observed. The filtration mode is not 20 initiated by the release of gases such as VOCs. 21

- ²² If <u>utility <u>electrical</u> power fails, the exhaust filter system is powered by backup diesel generators.</u>
- Normal TRU mixed waste handling and related operations cease upon loss of <u>utility electric</u>

power and are not resumed until normal <u>utility electric</u> power is returned. As specified in <u>Permit</u>

Part 2, all-waste handling equipment will "fail safe," meaning that it will retain its load during-in

- 26 <u>the event of a power outage</u>.
- 27 Underground Ventilation Normal Mode Redundancy

28 The underground ventilation system has been provided redundancy in normal ventilation mode

- ²⁹ by the addition of a third main fan. Ductwork leading to that new fan ties into the existing main ³⁰ exhaust duct.
- 31 Electrical System

The WIPP facility uses electrical power (utility power) supplied by the regional electric utility company. If there is a loss of utility power, TRU mixed waste handling and related operations will cease.

Backup, alternating current power will be provided on site by diesel generators. These units provide a high degree of reliability. Each of the diesel generators can carry predetermined equipment loads while maintaining additional power reserves. Predetermined loads include lighting and ventilation for underground facilities, lighting and ventilation for the TRU mixed waste handling areas, and the Air Intake Shaft hoist. The diesel generators can be brought on lineonline within 30 minutes either manually or from the control panel in the <u>Central Monitoring</u> Room (CMR)CMR.

- 1 Uninterruptible power supply (**UPS**) units are also on lineonline providing power to
- 2 predetermined monitoring systems. These systems ensure that the power to the radiation
- detection system for airborne contamination, the local processing units, the computer room, and
- 4 the CMR will always be available, even during the interval between the loss of off-site power
- 5 and initiation of backup diesel generator power.

6 A2-2a(4) RH TRU Mixed Waste Handling Equipment

7 The following are the major pieces of equipment used to manage RH TRU mixed waste in the 8 geologic repository. A summary of equipment capacities is included in Table A2-3.

9 The Facility Cask Transfer Car

- ¹⁰ The Facility Cask Transfer Car is a self-propelled rail car (Figure <u>M-34A2-14</u>) that operates
- between the Facility Cask Loading Room and the geologic repository. After the Facility Cask is
- loaded, the Facility Cask Transfer Car moves onto the waste Waste Shaft Shaft conveyance
- 13 <u>Conveyance and is then transported underground. At the underground waste Waste shaft Shaft</u>
- 14 station<u>Station</u>, the Facility Cask Transfer Car proceeds away from the waste-Waste shaft Shaft
- ¹⁵ conveyance <u>Conveyance</u> to provide forklift access to the Facility Cask.
- Horizontal Emplacement Machineand Retrieval Equipment or Functionally Equivalent
 Equipment
- 18 The Horizontal <u>A horizontal Emplacement emplacement machine (HEM)</u>and Retrieval
- 19 Equipment (HERE) or functionally equivalent equipment (Figure M-53A2-15), or functionally
- 20 <u>equivalent equipment</u>, emplaces canisters into a borehole in a room wall of an Underground
- 21 <u>underground HWDU</u>. Once the canisters have been emplaced, the HERE-<u>HEM</u> then fills the
- 22 borehole opening with a shield plug.

23 A2-2b Geologic Repository Process Description

- ²⁴ Prior to receipt of TRU mixed waste at the WIPP facility, waste operators will be thoroughly
- 25 trained in the safe use of TRU mixed waste handling and transport equipment. The training will
- ²⁶ include both classroom training and on-the-job training.
- 27 RH TRU Mixed Waste Emplacement
- 28 The Facility Cask Transfer Car is loadedloaded with a Facility Cask is moved onto the waste
- 29 Waste shaft Shaft conveyance Conveyance and is lowered to the waste Waste shaft Shaft
- 30 station <u>Station</u> underground. At the <u>waste Waste shaft Shaft station Station</u> underground, the
- Facility Cask is moved from the waste Waste shaft Shaft conveyance Conveyance by the
- ³² Facility Cask Transfer Car (Figure <u>M-54A2-16</u>). A forklift is used to remove the Facility Cask
- from the Facility Cask Transfer Car and to transport the Facility Cask to the Underground
- HWDU. There, the Facility Cask is placed on the <u>HEMHERE (Figure A2-17)</u>. The <u>HERE <u>HEM</u> is</u>
- used to emplace the RH TRU mixed waste canister into the borehole. ZThe borehole will beis
- visually inspected for obstructions prior to aligning the HERE <u>HEM</u> and emplacement of the RH
- 37 TRU mixed waste canister. The Facility Cask is moved forward to mate with the shield collar,
- and the transfer carriage is advanced to mate with the rear Facility Cask shield valve. The shield
- valves on the Facility Cask are opened, and the transfer mechanism advances to push the
- 40 canister into the borehole. After retracting the transfer mechanism into the Facility Caskits

<u>housing</u>, the forward shield valve(s) is closed, and the transfer mechanism is further retracted
 into its housing. The transfer mechanism is moved to the rear, and the shield plug carriage

- containing a shield plug is placed on the emplacement machine <u>cask carriage</u>. The transfer
- mechanism is used to push the shield plug into the Facility Cask. The front shield valve is
- 5 opened, and the shield plug is pushed into the borehole (Figure A2-18), thereby completing the
- 6 emplacement. The transfer mechanism is retracted, the shield valves close on the Facility Cask,
- 7 and the Facility Cask is removed from the HERE.
- 8 A shield plug is a concrete filled cylindrical steel shell (Figure <u>M-55A2-21</u>) approximately 61 in-
- 9 (<u>155 cm</u>) long and 29 in-<u>(74 cm</u>) in diameter, made of concrete shielding material inside a 0.24
- in <u>- (0.61 cm)</u> thick steel shell with a removable pintle at one end. Each shield plug has integral
- forklift pockets and weighs approximately 3,750 lbspounds (lb) (1,700 kg). The shield plug is inserted with the pintle end closest to the HERE-HEM to provide the necessary shielding-,
- inserted with the pintle end closest to the HERE <u>HEM</u> to provide the necessary shielding-,
 limiting the borehole radiation dose rate at <u>11.8 in (</u>30 cm) to less than 10 <u>milliremmerem</u> per
- hour for a canister surface dose rate of 100 rem per hour/hr. Additional shielding is provided at
- the direction of the Radiological radiological Control control Technician technician based on
- dose rate surveys following shield plug emplacement. This additional shielding is provided by
- the manual emplacement of one or more shield plug supplemental shielding plates and a
- 18 retainer (Figures <u>M-55</u>A2-19 and A2-20).
- 19 The amount of RH TRU mixed waste disposal disposed in each panel is limited based on
- 20 thermal and geomechanical considerations and shall not exceed 10 kilowatts per acre as
- 21 described in Permit Attachment <u>Section</u> A2-1. RH-<u>Remote-handled</u> TRU mixed waste
- 22 emplacement boreholes shall beare drilled in the ribs of the panels at a nominal spacing of 8 ft
- 23 (2.4 m) center-to-center, horizontally.
- Figures <u>M-40</u>A1-26 and <u>M-41</u>A1-27 are flow diagrams of the RH TRU mixed waste handling process for the RH-TRU 72-B and CNS 10-160B casks, respectively.
- 26 CH TRU Mixed Waste Emplacement
- 27 CH TRU mixed waste containers and shielded containers will arrive by tractor-trailer at the
- 28 WIPP facility in sealed shipping containers. Prior to unloading the packages from the trailer,
- 29 they will undergo security and radiological checks and shipping documentation reviews. The
- 30 trailers carrying the shipping containers will be stored temporarily at the Parking Area Container
- 31 Storage Unit (Parking Area Unit). A forklift will remove the Contact Handled Packages from the
- 32 transport trailers and a forklift or Yard Transfer Vehicle will transport them into the Waste
- ³³ Handling Building Container Storage Unit for unloading of the waste containers. Each
- 34 TRUPACT-II may hold up to two 7-packs, two 4-packs, two 3-packs, two SWBs, or one TDOP.
- ³⁵ Each HalfPACT may hold up to seven 55-gal (208 L) drums, one SWB, one three-pack of
- 36 shielded containers or four 85-gal (322 L) drums. Each TRUPACT-III will hold one SLB2. An
- 37 overhead bridge crane or Facility Transfer Vehicle with transfer table will be used to remove the
- 38 waste containers from the Contact Handled Packaging and place them on a facility or
- 39 containment pallet. Each facility pallet has two recessed pockets to accommodate two sets of 7-
- 40 packs, two sets of 3-packs, two sets of 4-packs, two SWBs stacked two-high, two TDOPs, or
- 41 one SLB2. Each stack of waste containers will be secured prior to transport underground (see
- Figure A2-3). A forklift or the facility transfer vehicle will transports the loaded facility pallet to the
- conveyance loading room adjacent to the Waste Shaft. The facility transfer vehicle will be is
- driven onto the waste <u>Waste shaft Shaft conveyance Conveyance</u> deck, where the loaded
- 45 facility pallet will beis transferred to the waste-Waste shaft Shaft conveyance Conveyance, and

the facility transfer vehicle will beis backed off. Containers of CH TRU mixed waste (55-gal

2 (208₂-L) drums, SWBs, 85-gal (322₂-L) drums, 100-gal (379₂-L) drums, and TDOPs) or shielded

- 3 containers can be handled individually, if needed, using the forklift and <u>appropriate</u> lifting
- 4 attachments (i.e.<u>e.g.</u>, drum handlers, parrot beaks).

5 The waste <u>Waste shaft Shaft conveyance Conveyance will</u> lowers the loaded facility pallet to the

6 underground. At the waste Waste shaft Shaft station Station, the CH TRU underground

7 transporter will is backed up to the waste Waste shaft shaft conveyance Conveyance, and the

8 facility pallet will beis transferred from the waste-Waste shaft-Shaft conveyance Conveyance

9 onto the transporter (see Figure M-46A2-6). The transporter will is then used to move the facility

pallet to the appropriate Underground <u>underground</u> HWDU for emplacement. The underground

11 waste transporter is equipped with a fire suppression system, rupture-resistant diesel fuel tanks,

and reinforced fuel lines to minimize the potential for a fire involving the fuel system.

A forklift in the HWDU near the waste stack will beis used to remove the waste containers from 13 the facility pallets and to place them in the waste stack using a push-pull attachment or, in the 14 case of an SLB2, the SLB2 will beis lifted from the facility pallet and placed directly on the floor 15 of the emplacement room. The waste will be emplaced room by room in Panels 1 through 8. 16 Each panel will be closed off from active ventilation when filled. If a waste container is damaged 17 during the Disposal Phase, it will be immediately overpacked or repaired. CH-Contact-handled 18 TRU mixed waste containers will beare continuously vented. The filter vents will-allow 19 aspiration, preventing internal pressurization of the container-and minimizing the buildup of 20 flammable gas concentrations. 21

Once a waste panel is has been mined and any initial ground control established, flow control 22 devices will beare constructed to assure adequate control over ventilation during waste 23 emplacement activities. The first room to be filled with waste will be stypically Room 7, which is 24 the one that is farthest from the main access waysdrifts. A ventilation control point will beis 25 established for Room 7 either just outside the exhaust side of Room 6 or at the inlet side of 26 Room 7. This ventilation control point will-consists of a flow control device (e.g., bulkhead with a 27 ventilation regulator, or brattice cloth-barricade). When RH TRU mixed waste canister 28 emplacement is completed in a room, CH TRU mixed waste emplacement can begin in that 29 room. Stacking of CH TRU mixed waste will-typically begins at the exhaust side of the room and 30 proceed down the access drift, through the room and up the intake access drift until the 31 entrance of Room 6 is reached. At that point, a brattice_-cloth and chain_-link barricade and, if 32 necessary, bulkheads will be emplacedinstalled. This process will be typically repeated for 33 Room 6, and so on until Room 1 is filled. At that point, the panel closure system will beis 34 constructed. 35

The emplacement of CH TRU mixed waste into the HWDUs will is typically be in the order 36 received and unloaded from the Contact Handled PackagingCH packaging. There is no 37 specification for the amount of space to be maintained between the waste containers 38 themselves, or between the waste containers and the walls. Containers will beare stacked in the 39 best manner to provide stability for the stack (which is up to three containers high) and to make 40 best use of available space. It is anticipated that tThe space between the wall and the container 41 could beranges from 8 to 18 in- (20 to 46 cm). This space is a function of disposal room wall 42 irregularities, container type, and sequence of emplacement. Bags of backfill will occupy some 43 of this space. Space is required over the stacks of containers to assure adequate ventilation for 44 waste handling operations. A minimum of 16 in- (41 cm) was specified in the Final Design 45 Validation Report (Appendix D1, Chapter 12 of the WIPP RCRA Part B Permit Application 46

- 1 (DOE, 1997)) to maintain air flowairflow. Typically, the space above a stack of containers will
- ² beis 36 to 48 in- (90 to 122 cm). However, <u>18 in. (0.45 m) will contain</u> backfill material,
- 3 consisting of bags of Magnesium Oxide (MgO), will take up 18 in (45 cm) of height. Figure M-
- 4 <u>48</u>A2-8 shows a typical container configuration, although this figure does not mix containers on
- any row. Such mixing, while inefficient, will beis allowed to assure timely movement of waste
- 6 into the underground. No aisle space <u>will beis</u> maintained for personnel access to emplaced
- 7 waste containers. No roof maintenance behind stacks of waste is planned.
- 8 The anticipated schedule for the filling of each of the Underground <u>underground</u> HWDUs known
- as Panels 1 through 8 is shown in Permit Attachment G, Table G-1. Panel closure in
- accordance with the Closure Plan in Permit Attachment G and Permit Attachment G1 is
- estimated to require an additional <u>150 <u>180</u> days <u>following placement of the final waste in the</u></u>
- 12 <u>panel</u>.
- Figures <u>M-38 and M-39A2-12 is a are flow diagrams</u> of the CH TRU mixed waste handling
 process.
- 15 <u>A2-3 Waste Characterization</u>
- 16 TRU-<u>Transuranic</u> mixed waste characterization is described in Permit Attachment C.
- 17 A2-4 Treatment Effectiveness
- TRU <u>Transuranic</u> mixed waste treatment, as defined in 20.4.1.101 <u>100</u> NMAC (incorporating 40
 CFR §260.10), for which a permit is required, will not be <u>is not</u> performed at the WIPP facility.
- 20 A2-5 Maintenance, Monitoring, and Inspection
- 21 A2-5a Maintenance
- 22 A2-5a(1) Ground-Control Program
- ²³ The ground-control program at the WIPP facility will-ensure<u>s</u> that any room in an HWDU in
- 24 which waste will be placed will beis sufficiently supported to assure waste disposal activities can
- 25 <u>be carried out safely. In addition, compliance with the applicable portions of the Land</u>
- 26 Withdrawal Act (**LWA**), which requires a regular review of roof-support plans and practices by
- 27 the Mine Safety and Health Administration (**MSHA**). Support is installed to <u>Ground control is</u>
- 28 <u>performed in accordance with standard operating procedures that incorporate</u> the requirements
- of 30 CFR <u>§Part</u> 57, Subpart B.
- 30 A2-5b Monitoring
- 31 <u>A2-5b(1)</u> Groundwater Monitoring
- 32 Groundwater monitoring for the WIPP Uunderground HWDUs will beis conducted in accordance
- 33 with <u>Permit</u> Part 5 and Permit Attachment L-of this permit.

Geomechanical Monitoring A2-5b(2) 1

The geomechanical monitoring program at the WIPP facility is an integral part of the ground-2

control program (See Figure A2-13). HWDUsHazardous waste disposal units, and drifts, and 3

geomechanical test rooms will be are monitored to provide confirmation of structural integrity. 4

Geomechanical data on the performance of the repository shafts and excavated areas will 5

beare collected as part of the geotechnical field-monitoring program. The results of the 6

geotechnical investigations will beare reported annually in the Geotechnical Analysis Report 7

(GAR). The report will-describes monitoring programs and geomechanical data collected during 8

the previous year. 9

Description of the Geomechanical Monitoring System A2-5b(2)(a) 10

The Geomechanical Monitoring System (GMS) provides in situ data to support the continuous 11 assessment of the design for underground facilities. Specifically, the GMS provides for:

- 12
- Early detection of conditions that could affect operational safety, 13 •
- Evaluation of disposal room closure that ensures adequate access, 14 •
- Guidance for design modifications and remedial actions, and 15
- Data for interpreting the behavior of underground openings, in comparison with 16 established design criteria. 17
- The instrumentation in Table A2-2 is available for use in support of the geomechanical program. 18

The minimum instrumentation for each of the eight panels will beis one borehole extensometer 19

installed in the roof at-near the center of each disposal room. The roof extensometers will 20

monitor the dilation of the immediate salt roof beam and possible bed separations along clay 21

seams. Additional instrumentation will be installed as conditions warrant. 22

- Remote polling of the geomechanical instrumentation will beis performed at least once every 23
- 24 month. This frequency may be increased to accommodate any changes that may develop.

The results from the remotely read instrumentation will be are evaluated after each scheduled 25 polling. Documentation of the results will beare provided annually in the Geotechnical Analysis

26 ReportGAR. 27

Data from remotely read instrumentation will beare maintained as part of a geotechnical 28

instrumentation system. The instrumentation system provides for data maintenance, retrieval, 29

and presentation. The Permittees will-retrieve the data from the instrumentation system and 30

verify data accuracy by confirming the measurements were taken in accordance with applicable 31

instructions and equipment calibration is known. Next, the Permittees will-review the data after 32

each polling to assess the performance of the instrument and of the excavation. Anomalous 33

data will be investigated to determine the cause (instrumentation problem, error in recording, 34 changing rock ground conditions). The Permittees will calculate various parameters such as the

35 change between successive readings and deformation rates. This assessment will beis reported 36

to the Permittees' cognizant ground control engineer and operations personnel. The Permittees 37

will investigate unexpected deformation to determine if remediation is needed. 38

1 The stability of an open panel excavation is generally determined by the rock deformation rate. 2 The excavation may be unstable when there is a continuous increase in the deformation rate

- that cannot be controlled by the installed support system. The Permittees will-evaluate the
- 4 performance of the excavation. These evaluations assess the effectiveness of the roof support
- 5 system and estimate the stand-up time of the excavation. If an open panel shows the trend is
- toward adverse (unstable) conditions, the results will be reported to determine if it is necessary
- 7 to terminate waste disposal activities in the open panel. This report of the trend toward adverse
- 8 conditions in an open HWDU will also be provided to the Secretary of the NMED within seven
- 9 (7) calendar days of issuance of the report.

10 <u>A2-5b(2)(b) System Experience</u>

- Much experience in the use of geomechanical instrumentation was gained as the result of 11 performance monitoring of Panel 1, which began at the time of completion of the panel 12 excavation in 1988. The monitoring system installed at that time involved simple measurements 13 and observations (e.g., vertical and horizontal convergence rates, and visual inspections). 14 Minimal maintenance of instrumentation is required, and the instrumentation is easily replaced if 15 it malfunctions. Conditions throughout Panel 1 are well known. The monitoring program 16 continues to provide data to compare the performance of Panel 1 with that established 17 elsewhere in the underground. Panel 1 performance is characterized by the following: 18 The development of bed separations and lateral shifts at the interfaces of the salt 19 and the clays underlying the anhydrites "a" and "b." 20
- Room closures. A closure due only to the roof movement will be separated from
 the total closure.
- The behavior of the pillars.
- e Fracture development in the roof and floor.
- Distribution of load on the support system.
- 26 Roof conditions are assessed from observation boreholes and extensometer measurements.
- 27 Measurements of room closure, rock displacements, and observations of fracture development
- in the immediate roof beam are made and used to evaluate the performance of a panel. A
- 29 description of the Panel 1 monitoring program was presented to the members of the
- 30 Geotechnical Experts Panel (in 1991) who concurred that it was adequate to determine
- 31 deterioration within the rooms and that it will provide early warning of deteriorating conditions.
- 32 The assessment and evaluation of the condition of WIPP <u>repository</u> excavations is an
- interactive, continuous process using the data from the monitoring programs. Criteria for
- 34 corrective action are continually reevaluated and reassessed based on total performance to
- date. Actions taken are based on these analyses and planned utilization of the excavation.
- 36 Because WIPP excavations are in a natural geologic medium, there is inherent variability from
- point to point. The principle adopted is to anticipate potential ground control requirements and
- implement them in a timely manner rather than to wait until a need arises.

- 1 A2-5b(3) Volatile Organic Compound Monitoring
- 2 The volatile organic compound monitoring for the WIPP Uunderground HWDUs will beis
- 3 conducted in accordance with <u>Permit</u> Part 4 and Permit Attachment N-of this permit.

4 <u>A2-5c Inspection</u>

- 5 The inspection<u>Inspections</u> of the WIPP Uunderground HWDUs will beare conducted in
- 6 accordance with <u>Permit</u> Part 2 and Permit Attachment E-of this permit.

7 <u>References</u>

- 8 DOE, 1997. Resource Conservation and Recovery Act Part B Permit Application, Waste
- 9 Isolation Pilot Plant (WIPP), Carlsbad, New Mexico, Revision 6.5, 1997.
- 10 DOE, 2009. WIPP Hazardous Waste Facility Permit Amended Renewal Application, Carlsbad,
- 11 New Mexico, September 2009.
- DOE, 2020. WIPP Hazardous Waste Facility Permit Renewal Application, Carlsbad, New
 Mexico, March 2020.

TABLES

Table A2-1CH TRU Mixed Waste Handling Equipment Capacities

Capacities for Equipment (Ib)				
Facility Pallet	25,000- lbs.			
Facility Transfer Vehicle	26,000 -lbs.			
Underground transporter	28,000 -lbs.			
Underground forklift	12,000 -lbs.			
SLB2 forklift	<u>36,000</u>			
Maximum Gross Weights of Con	tainers <u>.(Ib)</u>			
Seven-pack of 55- gallon-gal (208-L) drums	7,000- lbs.			
Four-pack of 85- gallon gal (322-L) drums	4,500<u>4,000</u>-lbs.			
Three-pack of 100- gallon-gal (379-L)_ drums	3,000- lbs.			
Ten-drum overpack	6,700 -lbs.			
Standard waste box	4,000 -lbs.			
Standard large box 2	10,500 -lbs.			
Shielded container	2,260 -lbs.			
Three-pack of shielded containers	7,000 -lbs.			
Maximum Net Empty Weights of Ed	quipment <u>(lb)</u>			
TRUPACT-II	13,140 -lbs.			
HalfPACT	10,500- lbs.			
TRUPACT-III	43,600 -lbs.			
Facility pallet	4,120 -lbs.			

Table A2-2		
Instrumentation Used in Support of the Geomechanical Monitoring System		

Instrument Type	Features	Parameter Measured	Range
Borehole Extensometer	The extensometer provides for monitoring the deformation parallel to the borehole axis. Units suitable for up to 5 measurements anchors in addition to the reference head. Maximum borehole depths shall beare 50 feet.	Cumulative Deformation	0-2 inches<u>in</u>
Borehole Television Camera	Closed circuit television may be used for monitoring areas otherwise inaccessible, such as boreholes or shafts.	Video Image	N/A
Convergence Points and Tape Extensometers	Mechanically anchored eyebolts to which a portable tape extensometer is attached.	Cumulative Deformation	2-50 feet<u>f</u>t
Convergence Meters	Includes wire and sonic meters. Mounted on rigid plates anchored to the rock surface.	Cumulative Deformation	2-50 feet<u>ft</u>
Inclinometers	Both vertical and horizontal inclinometers are used. Traversing type of system in which a probe is moved periodically through casing located in the borehole whose inclination is being measured.	Cumulative Deformation	0-30 degrees
Rock Bolt Load Cells	Spool type units suitable for use with rock bolts. Tensile stress is inferred from strain gauges mounted on the surface of the spool.	Load	0-300 kips
Earth Pressure Cells	Installed between concrete keys and rock. Preferred type is a hydraulic pressure plate connected to a vibrating wire transmitter.	Lithostatic Pressure	0-1 <u>.</u> 000 <u>pounds</u> <u>per square inch</u> (psi)
Piezometer Pressure Transducers	Located in shafts and of robust design and construction. Periodic checks on operability required.	Fluid Pressure	0-500 psi
Strain Gauges	Installed within the concrete shaft key. Suitably sealed for the environment. Two types used surface mounted and embedded.	Cumulative Deformation	0-3 ₂ 000 <u>microinches per</u> <u>inch (µin/in)</u> (embedded) 0-2 ₂ 500 µin/in (surface)

Table A2-3RH TRU Mixed Waste Handling Equipment Capacities

Capacities for Equipment ((b)			
41-Ton Forklift	82,000 -lbs		
Maximum Gross Weights of RH TRU Containers <u>.(Ib)</u>			
RH TRU Facility Canister	10,000 -lbs		
55- Gallon gal (208-L) Drum	1,000 -lbs		
RH TRU Canister	8,000 -lbs		
Maximum Net Empty Weights of Equipment (b)			
Facility Cask	67,700 -lbs		
Light Weight Facility Cask	<u>48,450</u>		

FIGURES

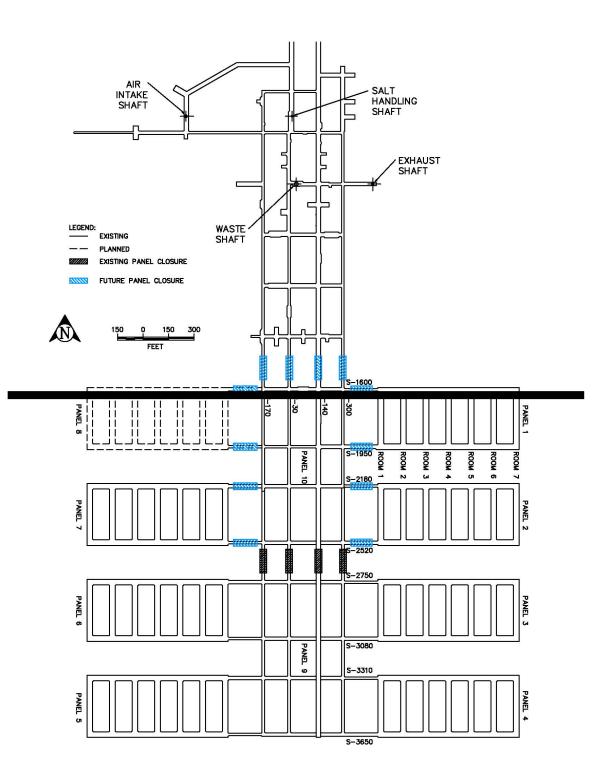


Figure A2-1 Repository Horizon

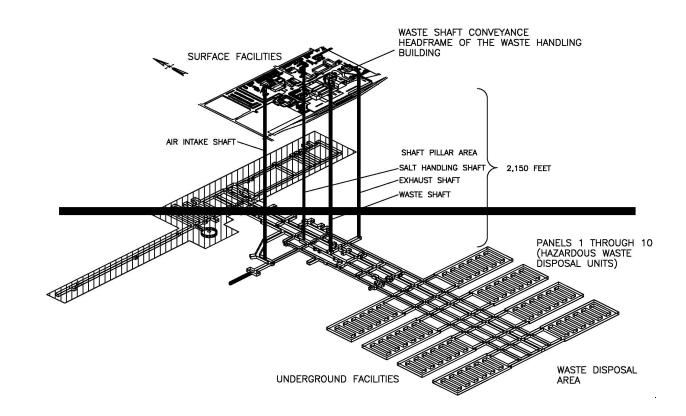


Figure A2-2 Spatial View of the Miscellaneous Unit and Waste Handling Facility

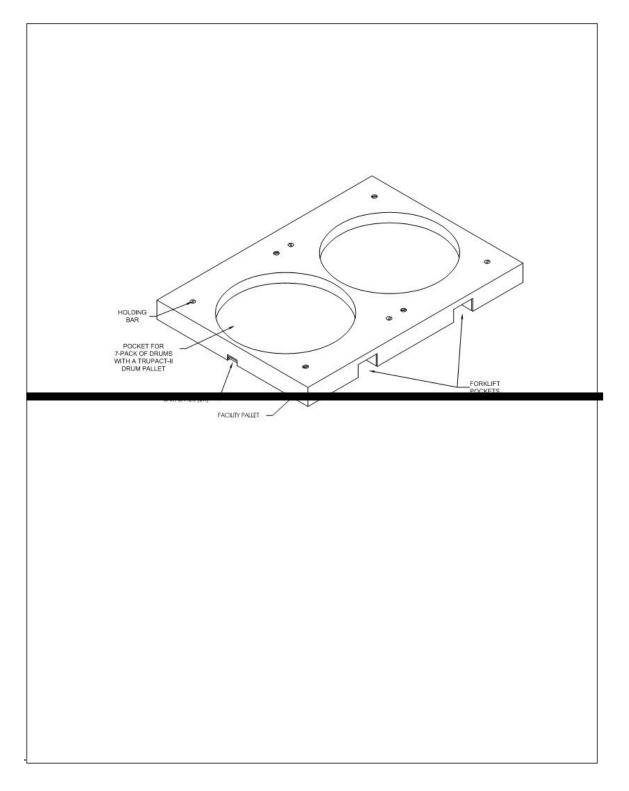
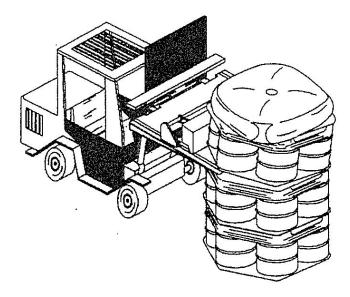


Figure A2-3 Facility Pallet for Seven-Pack of Drums



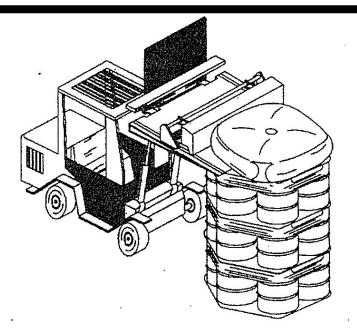


Figure A2-5 Typical Backfill Sacks Emplaced on Drum Stacks

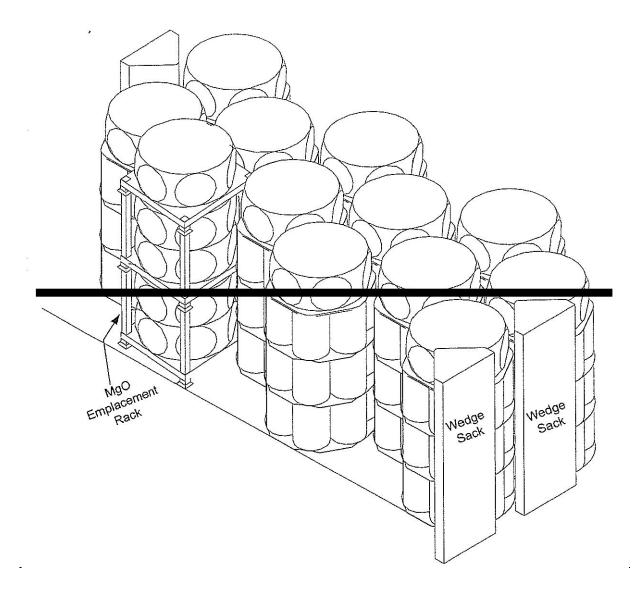


Figure A2-5a Potential MgO Emplacement Configurations

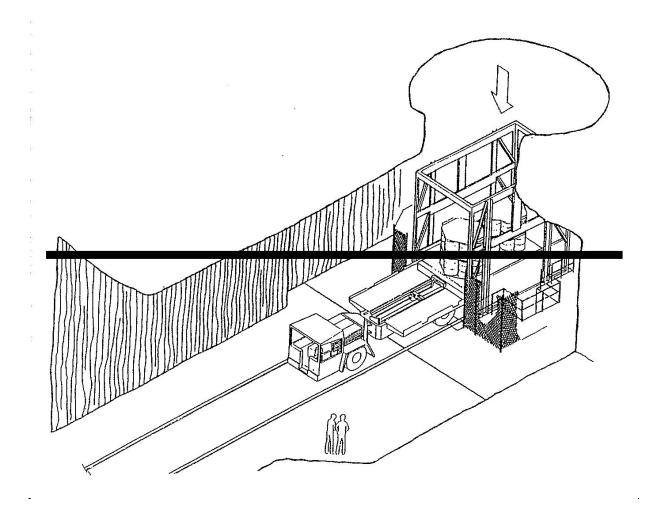


Figure A2-6 Waste Transfer Cage to Transporter

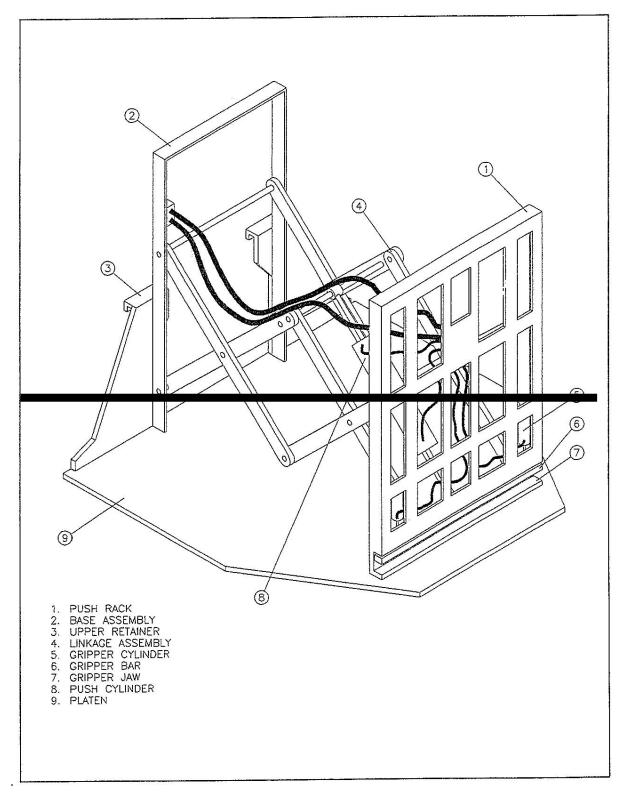


Figure A2-7 Push-Pull Attachment to Forklift to Allow Handling of Waste Containers

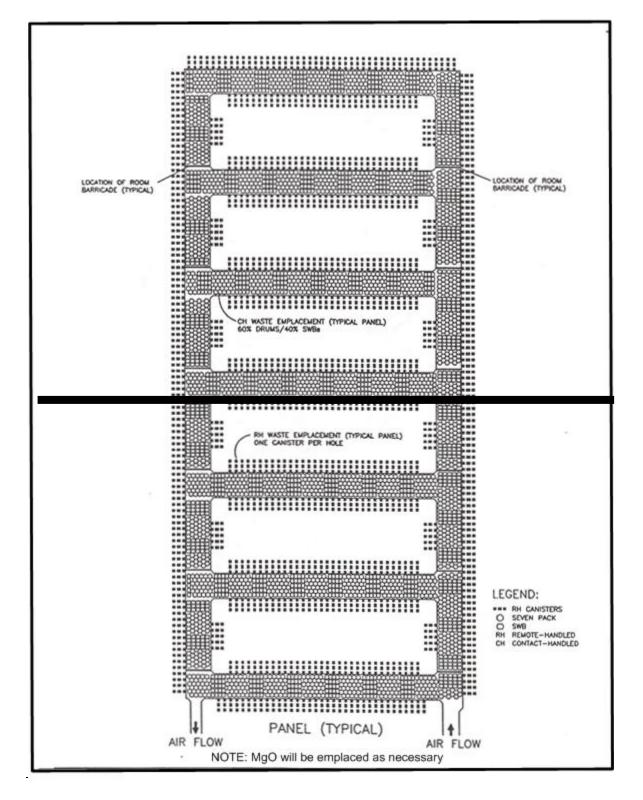


Figure A2-8 Typical RH and CH Transuranic Mixed Waste Container Disposal Configuration

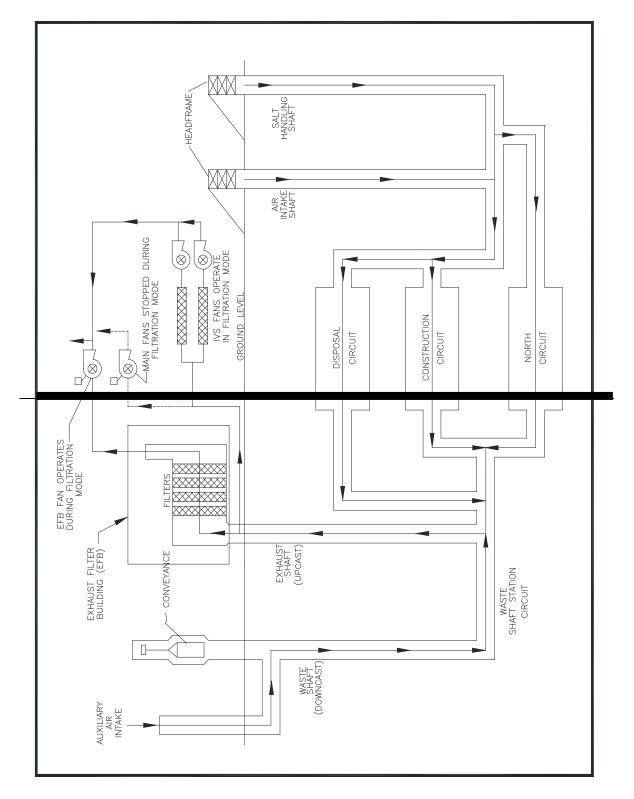


Figure A2-9a Underground Ventilation System Airflow

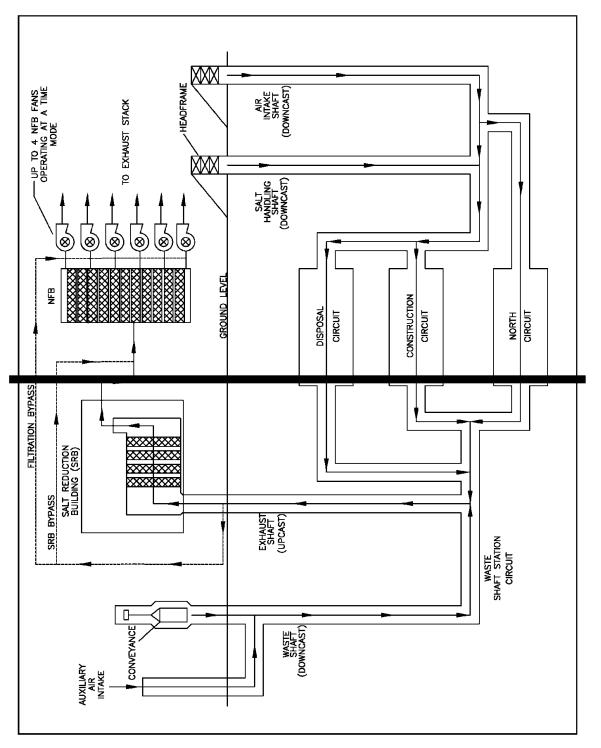


Figure A2-9a-NFB Underground Ventilation System Airflow (with Building 416)

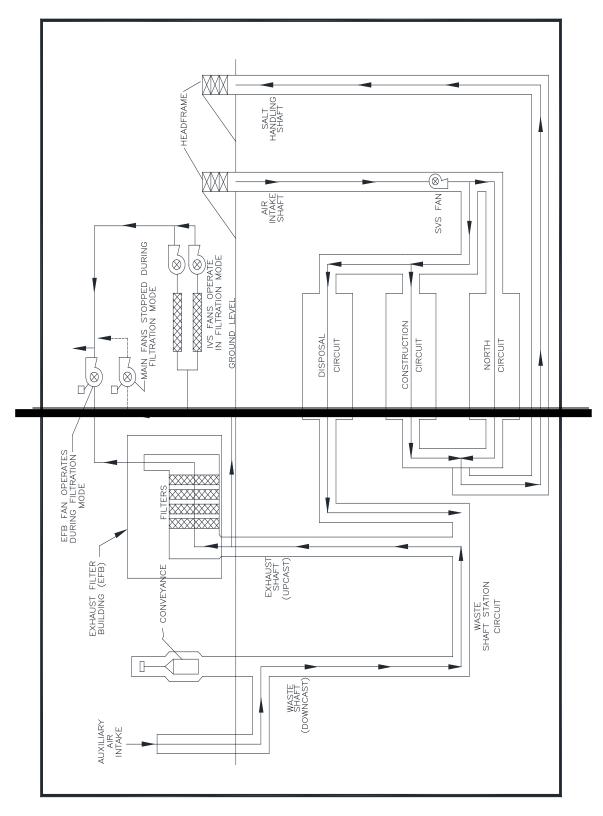


Figure A2-9b Underground Ventilation System Airflow (with SVS)

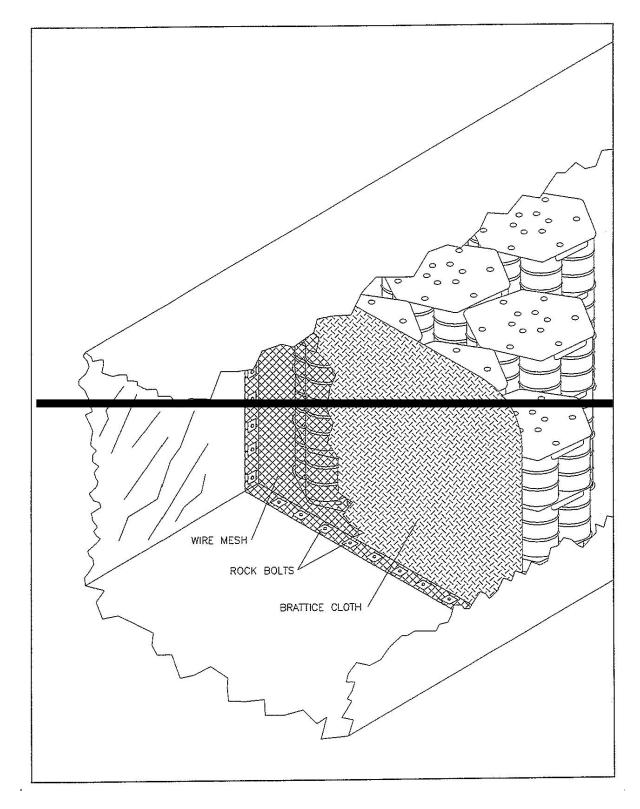


Figure A2-11 Typical Room Barricade

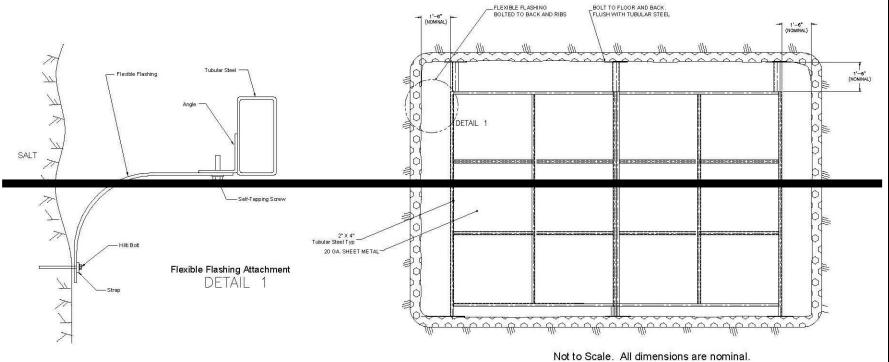


Figure A2-11a Typical Bulkhead

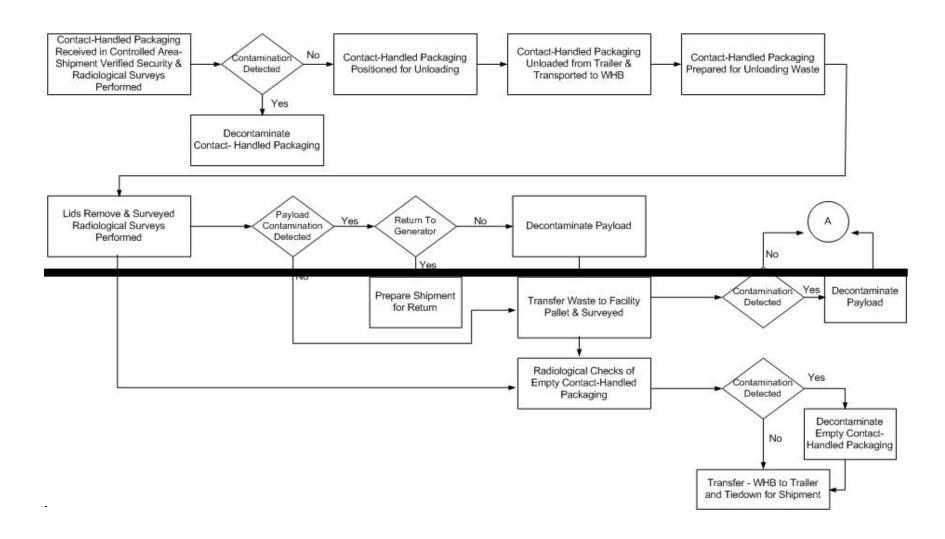
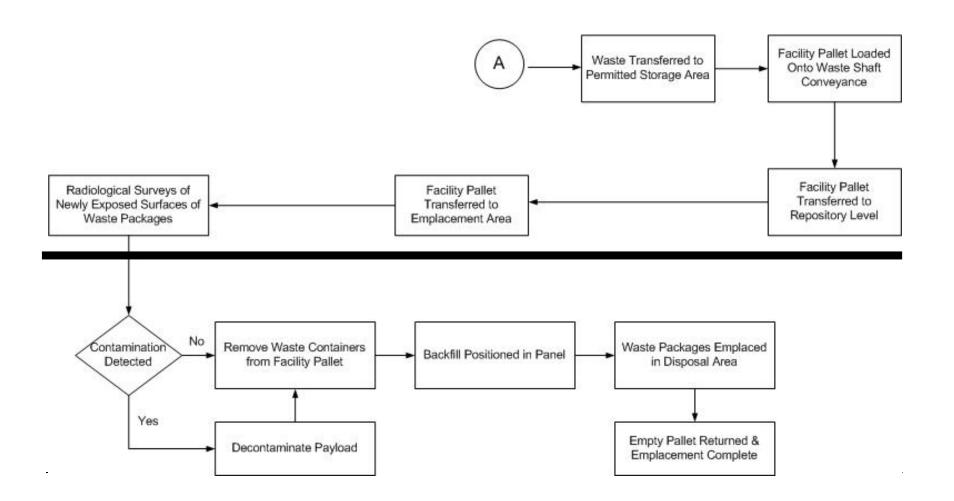
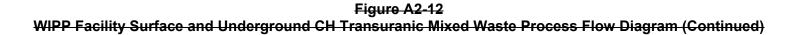


Figure A2-12 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram





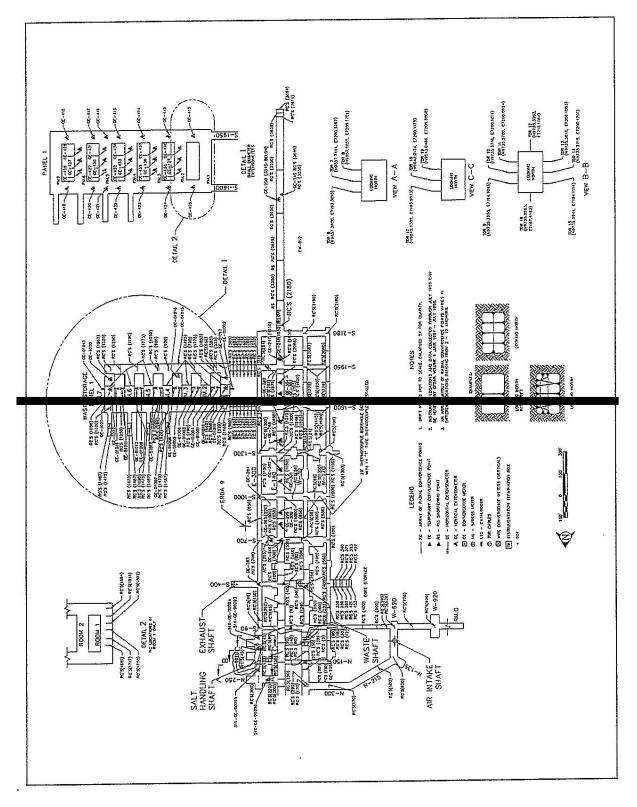


Figure A2-13 Layout and Instrumentation - As of 1/96

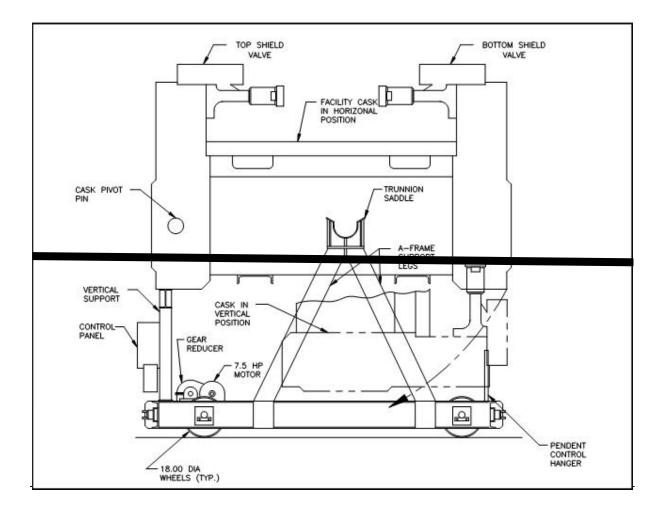


Figure A2-14 Facility Cask Transfer Car (Side View)

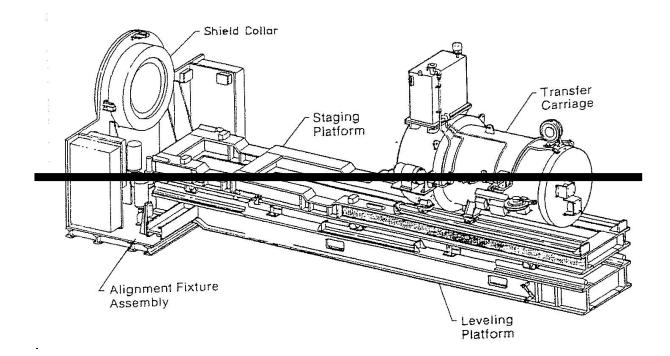


Figure A2-15 Typical Emplacement Equipment

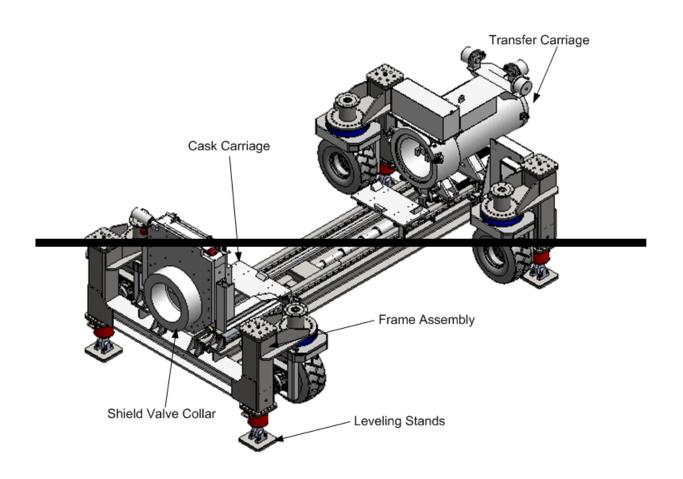


Figure A2-15a Typical Emplacement Equipment

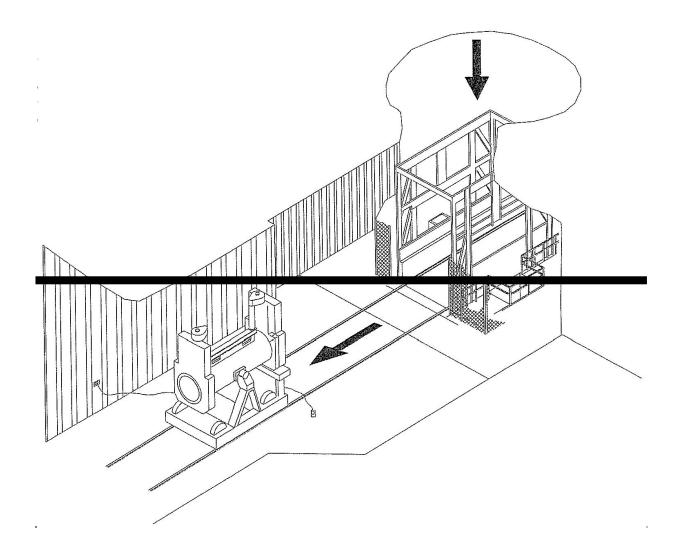


Figure A2-16 RH TRU Waste Facility Cask Unloading from Waste Shaft Conveyance

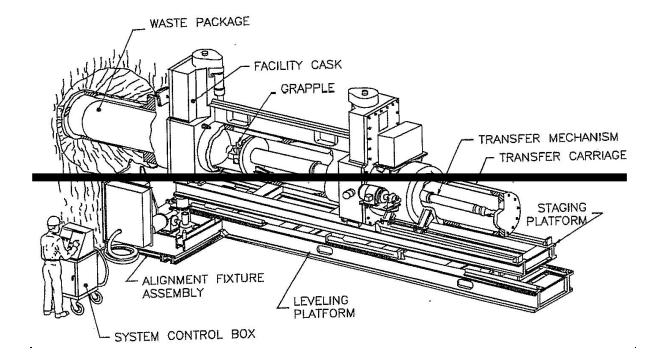


Figure A2-17 Facility Cask Installed on the Typical Emplacement Equipment

FACILITY CASK AGAINST SHIELD COLLAR, TRANSFER CARRIAGE RETRACTED, SHIELD PLUG CARRIAGE ON STAGING PLATFORM, SHIELD PLUG BEING INSTALLED

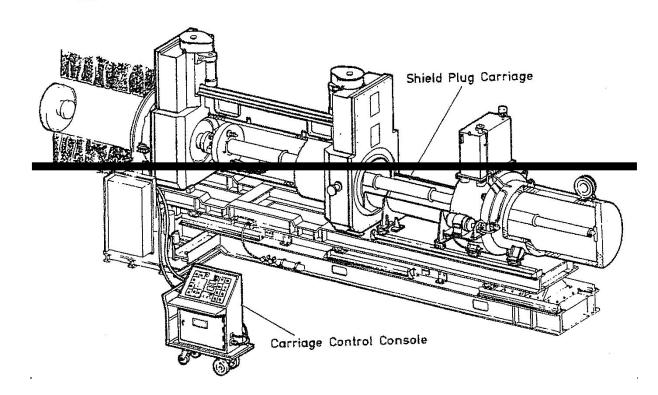


Figure A2-18 Installing Shield Plug

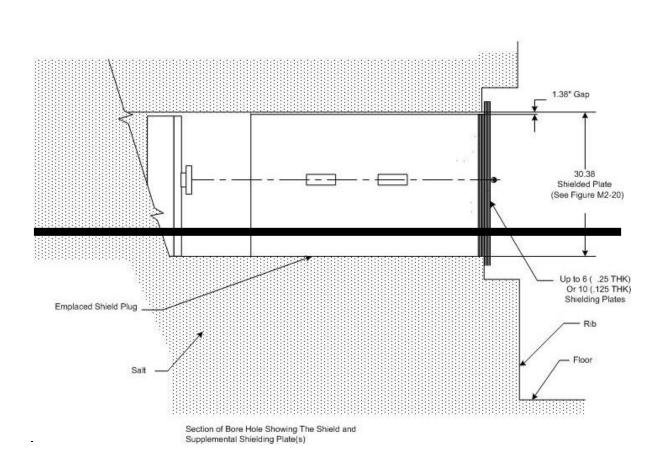


Figure A2-19 Shield Plug Supplemental Shielding Plate(s)

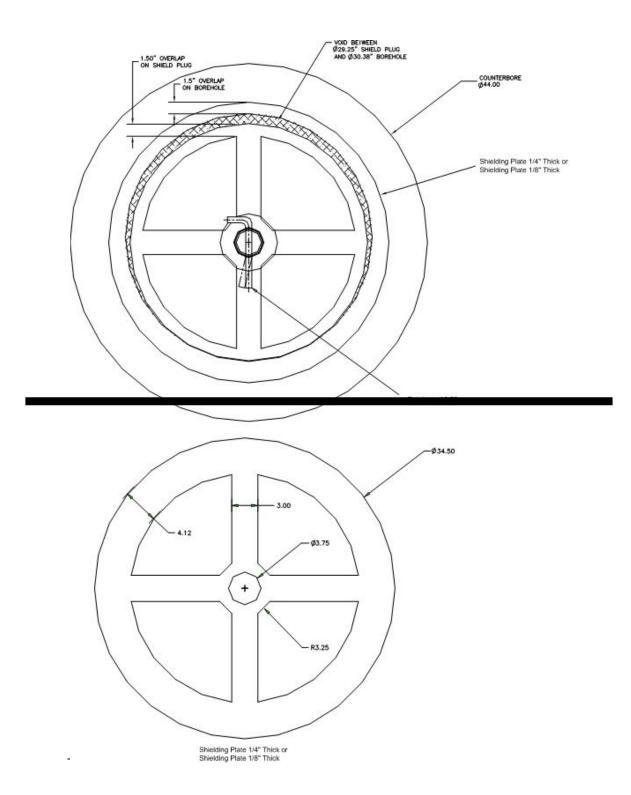
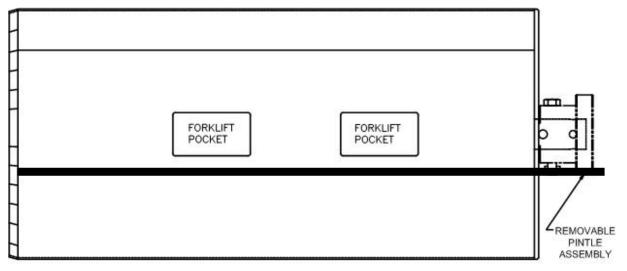


Figure A2-20 Shielding Layers to Supplement RH Borehole Shield Plugs



TYPICAL DIMENSION: APPROXIMATELY 29 INCHES DIAMETER X 61 INCHES SHIELDING LENGTH

Composition: Cylindrical steel shell filled with concrete Weight: Approximately 3750 pounds

Figure A2-21 Shield Plug Configuration ATTACHMENT A4<u>A3</u> TRAFFIC PATTERNS

1		ATTACHMENT A4A3	
2		TRAFFIC PATTERNS	
3		TABLE OF CONTENTS	
4	A3-1	Traffic Information and Traffic Patterns	.3
5	A3-2	Facility Access and Traffic	.3
6	A3-3	Waste Handling Building Traffic	.5
7	A3-4	Underground Traffic	.6
8 9	Refere	ences	.7

10		LIST OF TABLES
11	Table	Title
12 13	Table A4-1	Waste Isolation Pilot Plant Site Design Designation Traffic Parameters ^a
14		LIST OF FIGURES
15	Figure	Title
16	Figure A4-1	General Location of the WIPP Facility
17	Figure A4-2	WIPP Traffic Flow Diagram
18	Figure A4-2-NFB	WIPP Traffic Flow Diagram with Building 416
19	Figure A4-3	Waste Transport Routes in Waste Handling Building - Container Storage
20	Unit	
21	Figure A4-3a	Typical Transport Route for TRUPACT-II and Standard Large Box 2
22	Figure A4-3b	Typical Transport Route for TRUPACT-II and Standard Large Box 2 in
23	Roor	n 108
24	Figure A4-4	Typical Underground Transport Route Using E-140
25	Figure A4-4a	Typical Underground Transport Route Using W-30
26	Figure A4-5	RH Bay Waste Transport Routes
27	Figure A4-6	RH Bay Cask Loading Room Waste Transport Route
28	Figure A4-7	RH Bay Canister Transfer Cell Waste Transport Route
29		
30		

1

2

ATTACHMENT A4A3

TRAFFIC PATTERNS

3 <u>A4A3-1</u> Traffic Information and Traffic Patterns

4 Access to the Waste Isolation Pilot Plant (WIPP) facility is provided by two access roads via

5 Louis Whitlock Road that connects with U.S. Highway 62/180, 13 miles (mi) (21 kilometers

6 **(km)**) to the north, and NM <u>State</u> Highway 128 (Jal Highway), 4 mi (6.4 km) to the south (Figure

7 <u>M-56A4-1) via the South Access Road</u>. These access roads were built for the Permittees to

8 transport <u>transuranic (TRU)</u> mixed waste to the <u>site WIPP facility</u>. Both access roads are owned

and maintained by the Department of Energy (**DOE**). Signs and pavement markings are located

in accordance with the Uniform Traffic Control Devices Manual. Access-road design designation

parameters, such as traffic volume, are were presented in Table A4-1<u>the 2009 Amended</u>

12 <u>Renewal Application, Chapter G, Table G-1 (DOE, 2009)</u>.

13 A4A3-2 Facility Access and Traffic

Access to the <u>WIPP</u> facility for personnel, visitors, and trucks carrying supplies and TRU mixed

¹⁵ waste is provided through a security checkpoint (vehicle trap). After passing through the security

16 checkpoint, TRU mixed waste transport trucks will-normally turn right (south) before reaching

17 the Support Building and then left (east) to park in the parking area HWMUParking Area

¹⁸ <u>Container Storage Unit (PAU)</u> just east of the air locks (Figure <u>M-57A4-2</u>). Outgoing trucks

depart the same way they arrived, normally out of the west end of the parking area<u>PAU</u>, north

through the fence gate and out through the vehicle trap. An alternate inbound route is to

continue straight ahead <u>(east)</u> from the security checkpoint to the second road and to turn south

to enter the truck parking area<u>PAU</u>. The alternate outbound route is also the reverse of this
 route. Salt transport trucks, which remove mined salt from the Salt Handling Shaft area, will do

not cross paths with TRU mixed waste transporters; instead, they will proceed from the Salt

Handling Shaft northward to the salt pile. After passing through security, access for large

equipment may be provided through the east gate. Figures <u>M-57 and M-58</u>A4-2 shows surface

traffic flow at the WIPP facility.

The site-<u>WIPP facility</u> speed limit for motor vehicles is 10 <u>miles per hour (mph)</u> (16 <u>kilometers</u>

²⁹ <u>per hour (**kph**)</u> and 5 mph (8 kph) for rail movements. Speed limits are clearly posted at the

³⁰ entrance to the <u>site <u>facility</u> and enforced by security officers. There are no traffic signals. Stop</u>

signs are located at the major intersections of roadways with the main east-west road. Safety

requirements are communicated to all site personnel via General Employee Training which must

<u>be completed by site personnel</u> within 30 days of their employment. Employee access to on-site
 facilities requires an annual refresher course to reinforce the safety requirements. Security

facilities requires an annual refresher course to reinforce the safety requirements. Security officers monitor vehicular traffic for compliance with site restrictions, and provide instructions to

off-site delivery shipments. Vehicular traffic other than the waste transporters use the same

roads, but there will beis no interference because there are two lanes available on the primary

and alternate routes for waste shipments. Pedestrian traffic is limited to the sidewalks and

prominently marked crosswalks. Site traffic Traffic within the security fence is composed mostly
 of pickup trucks and electric carts with a an approximate frequency of perhaps 10 per hour at

of pickup trucks and electric carts with <u>a an approximate</u> frequency of perhaps-10 per hour at
 peak periods. Emergency vehicles are exercised periodically for maintenance and personnel

training, with an average frequency of one each per day. They are used for their intended

43 purpose on an as-required basis.

- 1 The traffic circulation system is designed in accordance with American Association of State
- 2 Highway and Transportation Officials (**AASHTO**) Site Planning Guides for lane widths, lateral
- 3 clearance to fixed objects, minimum pavement edge radii, and other geometric features. Objects
- 4 in or near the roadway are prominently marked.

5 On-site roads, sidewalks, and paved areas are used for the distribution and storage of vehicles

- and personnel and are designed to handle all-traffic generated by employees, visitors, TRU
 mixed waste shipments, and movements of operational and maintenance vehicles. The facility
- mixed waste shipments, and movements of operational and maintenance vehicles. The facility
 entrance and TRU mixed waste haul roads are designed for AASHTO H20-S16 wheel loading.
- Service roads are designed for AASHTO H10 wheel loading. Access and on-site paved roads
- are designed to bear the anticipated maximum load of 115,000 lbs-lb (52,163.1 kg), the
- maximum allowable weight of a truck/trailer carrying loaded Contact-Handled-handled
- 12 (CH) or Remoteremote-Handled handled (RH) Packagespackages. The facility is designed to
- handle approximately eight truck trailers per day, each carrying one or more Contact-
- 14 Handled<u>CH</u> or Remote-Handled<u>RH</u> Packages<u>packages</u>. This is equivalent to 3,640 TRU mixed
- 15 waste-carrying vehicles per year.

16 The calculations to support the anticipated maximum load of 115,000 lbs.lb are shown

- ¹⁷ below: were provided in the 2009 Amended Renewal Application, Chapter G (DOE, 2009).
- Soil Resistance R (psi) is taken directly from the WIPP Soil Report and Bechtel calculation
 because there is no change.
- 20 A. Pavement Thickness
- 21 The traffic frequency increase from 10 shipments per day to 10.15 shipments per day has only
- 22 minimal impact on the Total Expanded Average Load (EAL) and the traffic index (TI) as shown
- 23 below, both important parameters in pavement design.
- 24 Total EAL (TEAL):
- ²⁵ 13,780 ~ constant for 5 or more axles over 20 years, taken from Table 7-651.2A Highway
- 26 Design Manual (HDM).
- 27 TEAL = 13,780 × 25yr./20yr. = 17,225
- ²⁸ Using 10.15 shipments per day ~ 17,225 × 10.15 = 174,834
- 29 Conversion of EAL to Traffic Index (TI).
- 30 For TEAL of 174,834 ~ TI = 7.5 (from HDM, Table 7-651.2B)
- 31 Asphalt Concrete Thickness TAC:
- 32 GE = 0.0032 × TI × (100 -R)....R = 80
- 33 GE Gravel Equivalent (Ft).
- 34 GE = $0.0032 \times 7.5 \times 20 = 0.48' \dots$ GfAC = $2.01 \Rightarrow$ TAC = $0.48/2.01 = 0.24' \Rightarrow$ use $2\frac{1}{2}''$ AC
- 35 Surface Course.

- 1 (Actually used: 3")
- 2 Gf Gravel Equivalent Factor (constant from Table 7-651.2C from HDM).
- 3 B. Bituminous Treated Base
- 4 $GE = 0.0032 \times TI \times (100 R) \dots R = 55 \sim caliche subbase \Rightarrow GE = 1.08' GEBTB = 1.08 2.01 \times 0.21 = 0.66'$
- 5 0.21 = 0.66'
- 6 TBTB = GEBTB/GfBTB = 0.66/1.2 = 0.55' ⇒ Use 4" BTB
- 7 GfBTB ~ taken from table 7-651.2C
- 8 C. <u>Caliche Subbase ~ TCSB</u>
- 9 GE = 0.0032 × TI × (100 R)R = 50 prepared subgrade
- 10 GE = 1.2
- 11 GECSB = $1.2 (0.21 \times 2.07) (0.33 \times 1.2) \Rightarrow 0.37'$
- 12 TCBS = $0.37/1.0 = 0.37' \sim 4\frac{1}{2}''$
- 13 Based on the results of the above calculation, the site paved roads designated for waste
- 14 transportation are safe to be used by the heavier truckloads carrying shipping casks used in RH

15 **TRU mixed waste transportation to the WIPP.**

- 16 A4A3-3 Waste Handling Building Traffic
- 17 CH-Contact-handled TRU mixed waste will-arrives by tractor-trailer at the WIPP facility in sealed
- 18 Contact Handled<u>CH</u> Packages<u>packages</u>. Prior to unloading the packages from the trailer,
- 19 security checks, radiological surveys, and shipping documentation reviews will be<u>are</u> performed.
- 20 A forklift or Yard Transfer Vehicle will-removes the Contact HandledCH Packages packages and
- transport<u>s</u> them a short distance through an air lock that is designed to maintain differential
- 22 pressure in the <u>Waste Handling Building (WHB)</u>. The forklift or Yard Transfer Vehicle will
- ²³ placeplaces the shipping containers at one of the two TRUPACT-II unloading docks
- 24 (**TRUDOCKs**) inside the WHB or, in the case of the TRUPACT-III, at the payload transferbolting
- station in Room 108<u>in the WHB</u>.
- The TRUPACT-II may hold up to two 55-gallon (gal) drum seven-packs, two 85-gallon gal drum
- four-packs, two 100-gallon-gal drum three-packs, two standard waste boxes (SWBs), or one
- ten-drum overpack (**TDOP**). A HalfPACT may hold seven 55-gallon <u>g</u>aldrums, one SWB, or
- ²⁹ four 85-gallon-gal_drums, or three shielded containers. The TRUPACT-III holds a single
- 30 <u>standard large box 2 (SLB2)</u>. A six-ton overhead bridge crane or Facility Transfer Vehicle with a
- 31 transfer table will beis used to remove the contents of the Contact HandledCH
- ³² Package<u>package</u>. Waste containers <u>will beare</u> surveyed for radioactive contamination and
- ³³ decontaminated or returned to the Contact Handled<u>CH</u> Package<u>package</u>, as necessary.
- Each facility pallet will-accommodates four 55-gallon gal drum seven-packs, four SWBs, four 85-
- ³⁵ gallon-gal_drum four-packs, four 100-gallon-gal_drum three-packs, two TDOPs, or an SLB2<u>, or</u>

- 1 <u>two three-packs of shielded container assemblies</u>. Waste containers will be are secured to the
- 2 facility pallet prior to transfer. A forklift or facility transfer vehicle will transports the loaded facility
- ³ pallet <u>into</u> the air lock at the Waste Shaft (Figures <u>M-59</u>A4-3, A4-3a, and A4-3b). The facility
- 4 transfer vehicle will beis driven onto the waste shaft conveyance deck, where the loaded facility
- 5 pallet will beis transferred to the waste shaft conveyance and downloaded for emplacement.
- 6 <u>Remote-handled</u>RH TRU mixed waste will arrives at the WIPP facility in a payload container
- 7 contained in a shielded cask loaded on a tractor-trailer. Prior to unloading the cask from the
- 8 trailer, radiological surveys, security checks, and shipping documentation reviews will beare
- 9 performed, and the trailer carrying the cask will beis moved into the Parking Area PAU or
- directly into the RH Bay of the Waste Handling Building <u>Container Storage</u> Unit.
- The cask is unloaded from the trailer in the RH Bay and is placed on the Cask Transfer Car. The Cask Transfer Car is used to move the cask to the Cask Unloading Room. At this point, a
- The Cask Transfer Car is used to move the cask to the Cask Unloading Room. At this point, a crane moves the waste to the Hot Cell or the Transfer Cell. Some RH TRU mixed waste may be
- moved to the Hot Cell for overpacking before being moved to the Transfer Cell. Once in the
- 15 Transfer Cell, the Transfer Cell Shuttle Car moves the waste to a location beneath the facility
- cask. A crane is used to move the waste from the Transfer Cell Shuttle Car into the facility cask.
- 17 The Facility Cask Transfer Car then moves the facility cask to the underground. A more detailed
- description of waste handling in the WHB is included in Attachment A1. Figures A4-5, A4-6 and
- 19 A4-7<u>M-13, M-15, and M-16</u> show RH TRU mixed waste transport routes.
- 20 A4A3-4 Underground Traffic
- The Permittees shall designate the traffic routes of TRU mixed waste handling equipment and 21 construction equipment and record this designation on a map that is posted in a location where 22 it can be examined by personnel entering the underground. The map will be updated whenever 23 the routes are changed. Maps will be available in facility files until facility closure. The ventilation 24 and traffic flow path in the TRU mixed waste handling areas underground are restricted and 25 separate from those used for mining and haulage (construction) equipment, except that during 26 waste transport in W-30, ventilation need not be separated north of S-1600 (Figures A4-4 and 27 A4-4aFigure M-43). In general, the Permittees restrict waste traffic to the intake ventilation drift 28 to maximize isolation of this activity from personnel. The exhaust drift in the waste disposal area 29 will normally not be used for personnel access. Non-waste and non-construction traffic is 30 generally comprised of escorted visitors only and is minimized during each of the respective 31 operations. 32
- 33 Adequate clearances that exceed the mining regulations of <u>Title</u> 30 <u>of the Code of Federal</u>
- 34 <u>Regulations (CFR) §Part 57 exist underground for safe passage of vehicles and pedestrians.</u>
- ³⁵ Pedestrians/personnel are required to yield to vehicles in the WIPP underground facility. This
- condition is reinforced through the WIPP <u>facility</u> equipment operating procedures, the WIPP
- 37 Safety Manual, the WIPP <u>facility</u> safety briefing required for all underground visitors, the General
- 38 Employee Training annual refresher course, and the <u>Underground underground</u> annual
- ³⁹ refresher course that are mandated by 30 CFR <u>§Part</u> 57, the New Mexico Mine Code, and DOE
- 40 Order 5480.20A.
- In addition, other physical means are utilized to safeguard pedestrians/personnel when
- 42 underground such as:

- <u>All eEquipment operators are required to sound the vehicle horn when approaching</u>
 intersections.
- <u>All aA</u>irlock and bulkhead vehicle doors are equipped with warning bells or strobe
 lights to alert personnel when door <u>movement (opening or closing)</u> is imminent.
- ⁵ <u>Hemispherical mirrors are used at blind intersections so that persons can see</u> around corners.
- ⁷ <u>• All hH</u>eavy equipment is required to have operational back-up alarms.
- 8 Heavily used intersections are well lighted.
- 9 Typically, the traffic routes during waste disposal in <u>all-the</u>Panels-<u>panels</u> will-use the same main 10 access drifts.
- All t<u>T</u>raffic safety is regulated and enforced by the <u>Federal federal</u> and <u>State state</u> mine codes of regulations (30 CFR <u>§Part</u> 57 and New Mexico State Mine Code). The agencies that administer these codes make regular inspection tours of the WIPP underground facilities for the purpose of
- 14 enforcement.
- ¹⁵ All uUnderground equipment is designed for off-road use since all-driving surfaces are
- excavated in salt. No loads on the underground roadways will exceed the bearing strength of in situ halite.
- 18 <u>References</u>
- 19 DOE, 2009. WIPP Hazardous Waste Facility Permit Amended Renewal Application, Carlsbad,
- 20 <u>New Mexico, September 2009.</u>
- 21

TABLES

1 2

Table A4-1 Waste Isolation Pilot Plant Site Design Designation Traffic Parameters *

Traffic Parameter	North Access Road (No. of Vehicles, unless otherwise stated)	South Access Road (No. of Vchicles, unless otherwise stated)	On-Site Waste Haul Roads Contact-Handled and Remote-Handled Package Traffic)
Average Daily Traffic (ADT) ^b	800	800	8
Design Hourly Volume (DHV)^c	144	144	NA ^g
Hourly Volume (Max. at Shift Change)	250	250	NA
Distribution (D) ^d	67%	67%	NA
Trucks (T) *	2%	2%	100%
Design Speed ^{h ,i}	70 mph (113 kph)	60 mph (97 kph)	25 mph (40 kph)
Control of Access ^f	None	None	Full

* For WIPP personnel and TRU mixed waste shipments only.

^b ADT Estimated number of vehicles traveling in both directions per day.

^e DHV—A two-way traffic count with directional distribution.

^d D The percentage of DHV in the predominant direction of travel.

e T The percentage of ADT comprised of trucks (excluding light delivery trucks).

^f Control of Access—The extent of roadside interference or restriction of movement.

g NA Not applicable.

^h mph-miles per hour.

ⁱ kph kilometers per hour.

FIGURES

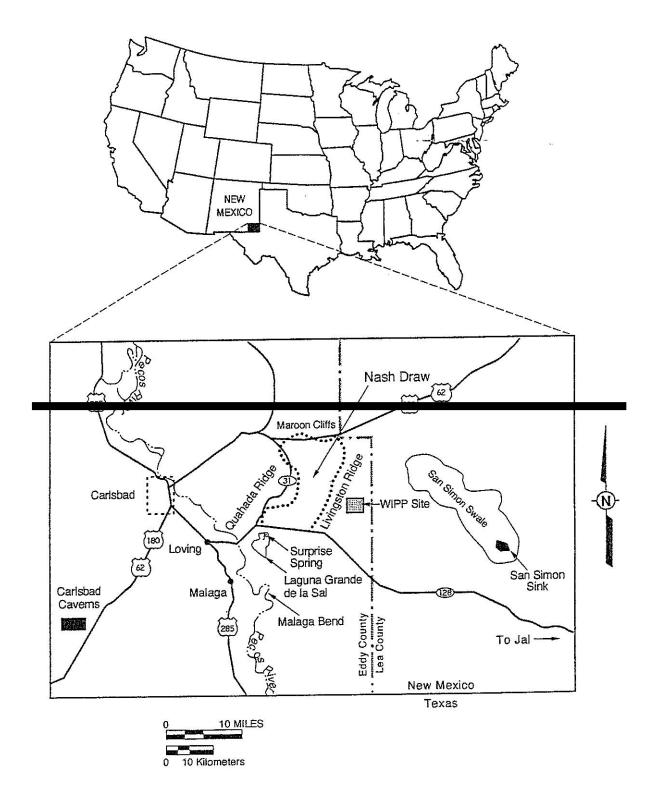


Figure A4-1 General Location of the WIPP Facility

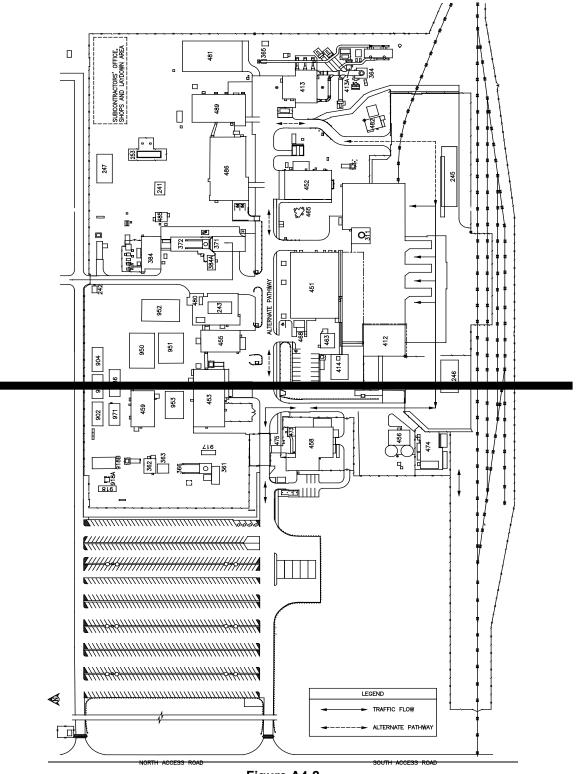


Figure A4-2 WIPP Traffic Flow Diagram

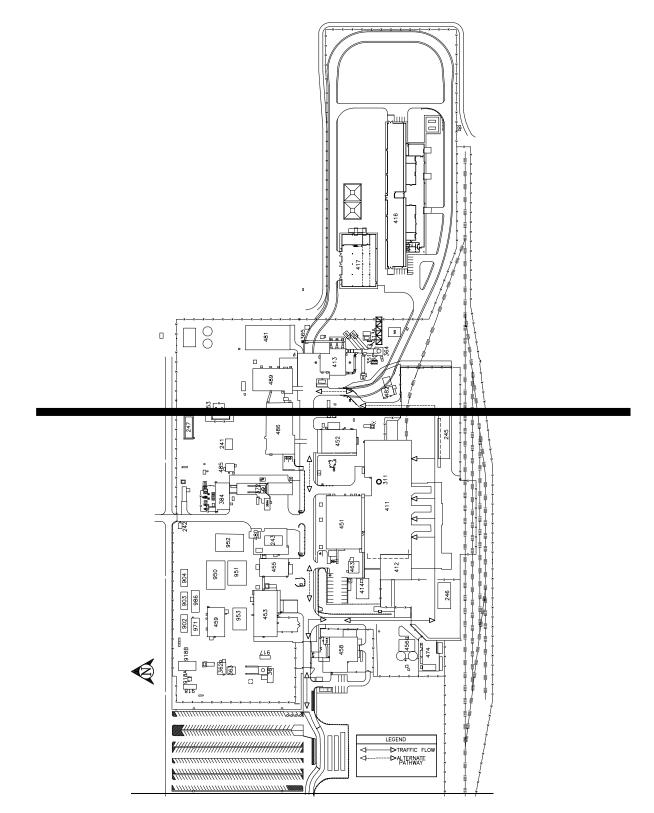


Figure A4-2-NFB WIPP Traffic Flow Diagram with Building 416

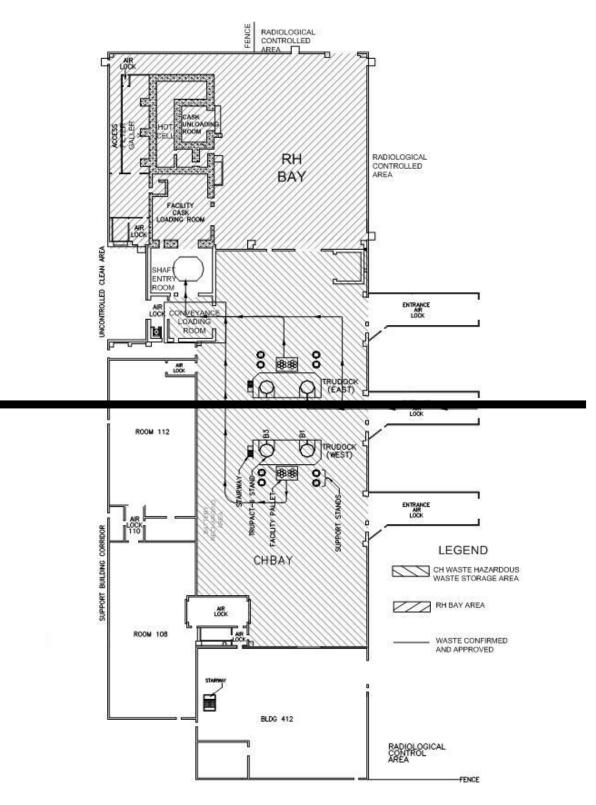


Figure A4-3 Waste Transport Routes in Waste Handling Building - Container Storage Unit

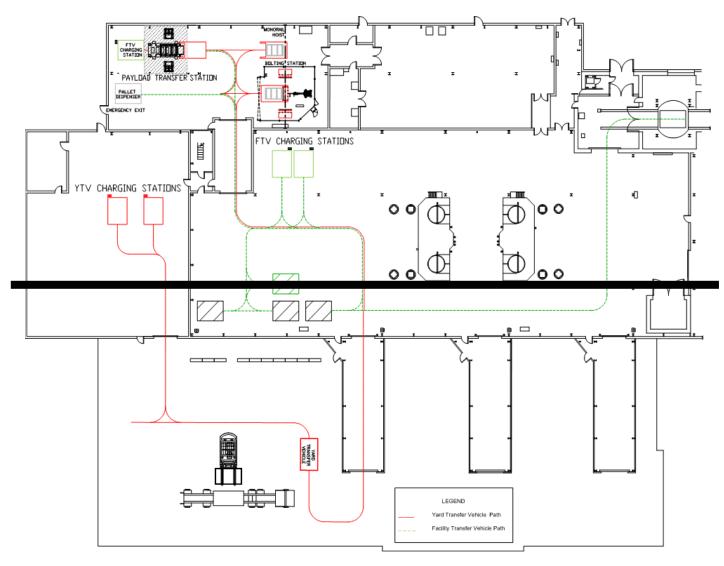


Figure A4-3a Typical Transport Route for TRUPACT-III and Standard Large Box 2

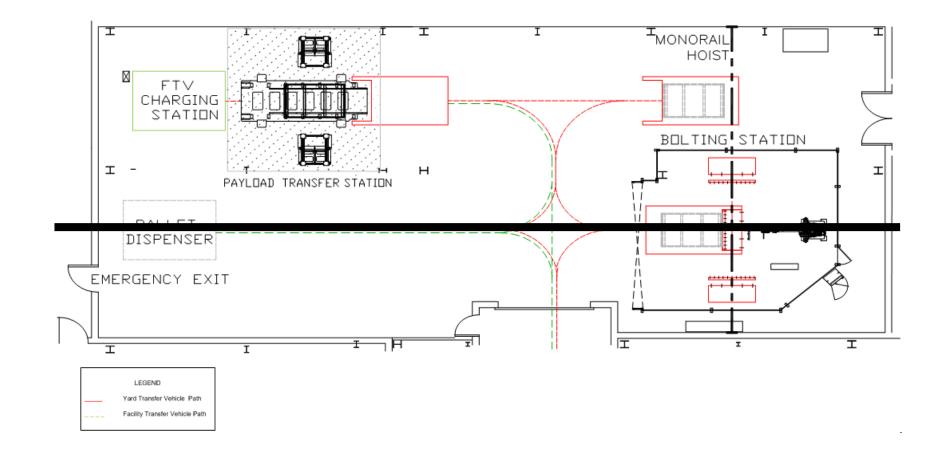


Figure A4-3b Typical Transport Route for TRUPACT-III and Standard Large Box 2 in Room 108

1

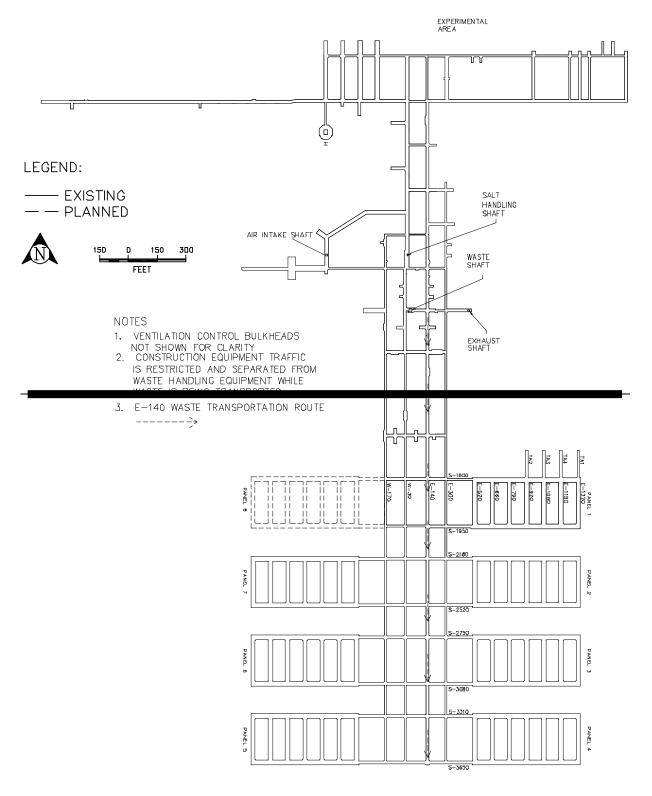


Figure A4-4 Typical Underground Transport Route Using E-140

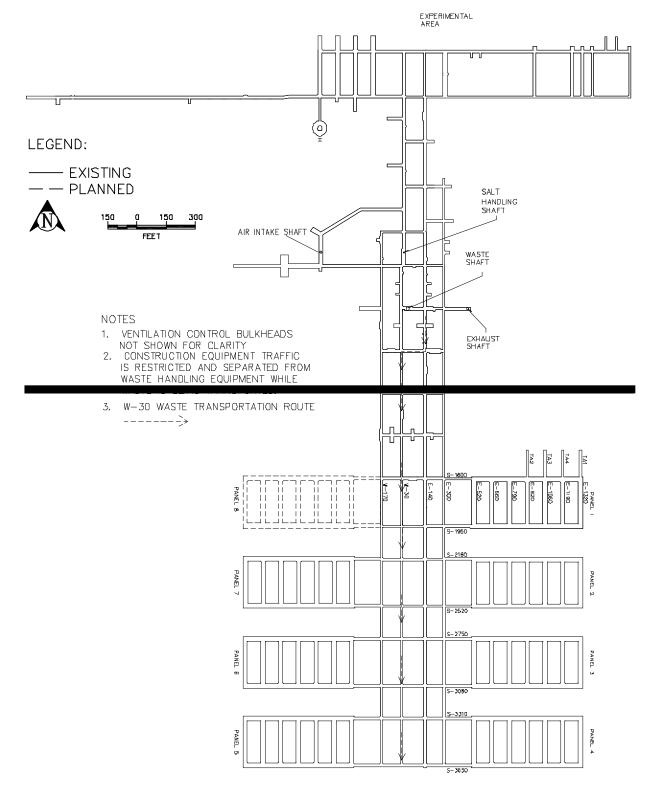


Figure A4-4a Typical Underground Transport Route Using W-30

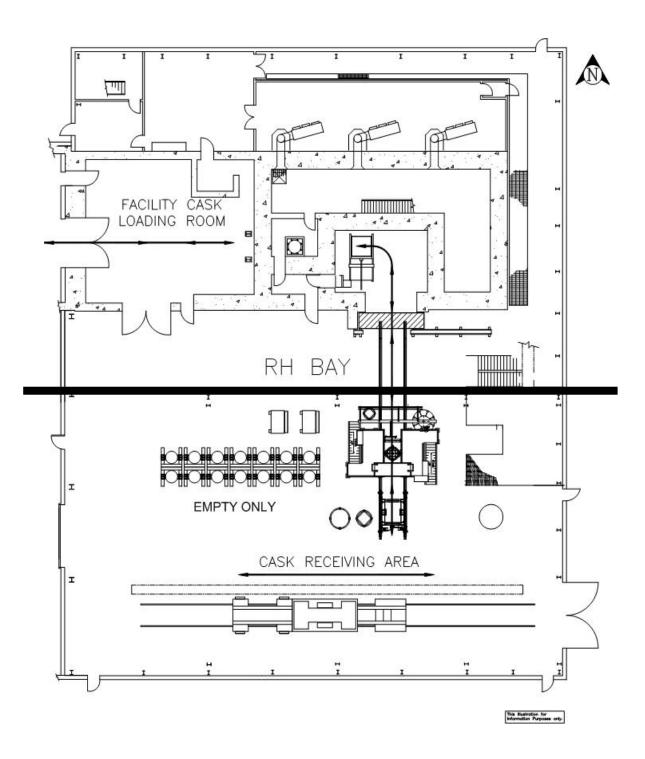
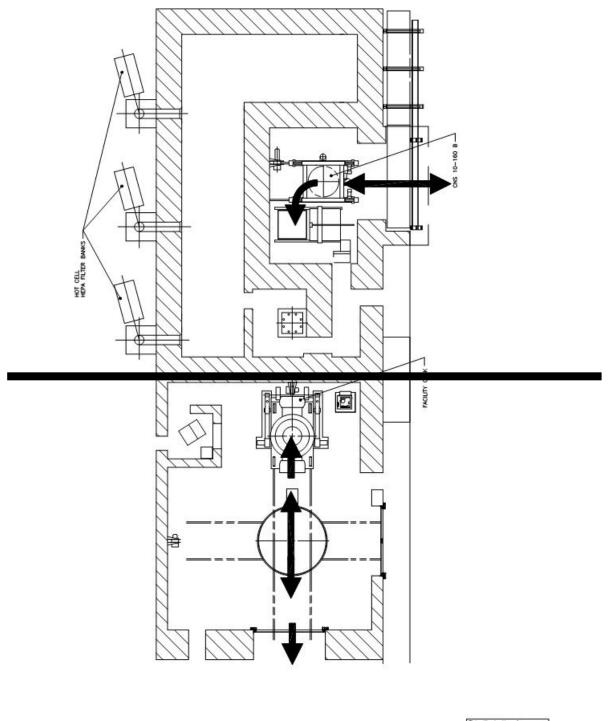


Figure A4-5 RH Bay Waste Transport Routes



This Illustration for Information Purposes only. CASK LOADING ROOM

Figure A4-6 RH Bay Cask Loading Room Waste Transport Route

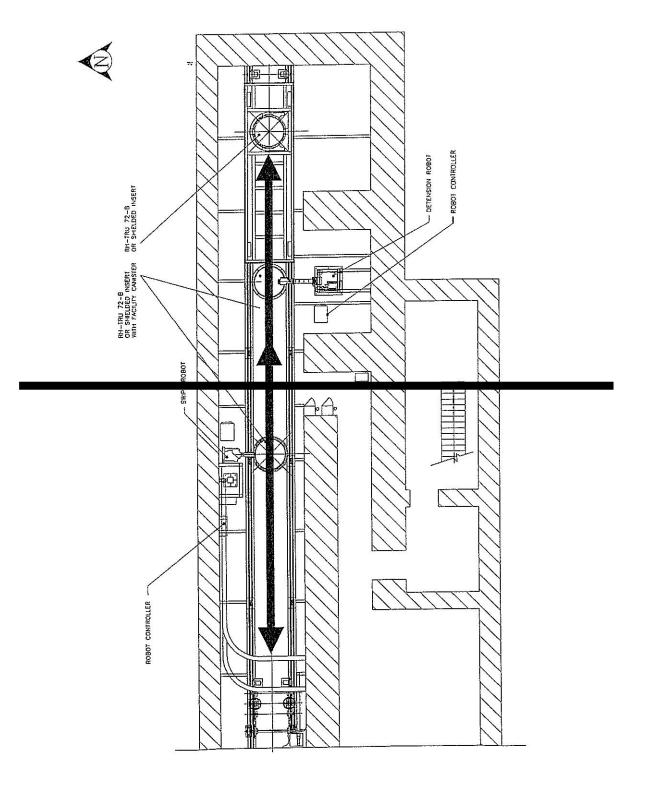


Figure A4-7 RH Bay Canister Transfer Cell Waste Transport Route

ATTACHMENT B

(RESERVED FOR PERMIT ATTACHMENT B, HAZARDOUS WASTE PERMIT APPLICATION PART A)

ATTACHMENT C WASTE ANALYSIS PLAN

ATTACHMENT C WASTE ANALYSIS PLAN

TABLE OF CONTENTS

C-0	Introdu C-0a C-0b C-0c C-0d	uction and Attachment Highlights Waste Characterization AK Sufficiency Determination Waste Stream Profile Form Completion Waste Confirmation	6 8 10
C-1	Identification of TRU Mixed Waste to be Managed at the WIPP Facility C-1a Waste Stream Identification C-1b Waste Summary Category Groups and Hazardous Waste Accepted at the WIPP Facility		11
	C-1c C-1d C-1e	Waste Prohibited at the WIPP Facility Control of Waste Acceptance Waste Generating Processes at the WIPP Facility	13
C-2		Characterization Program Requirements and Waste Characterization neters	14
C-3	Genera C-3a C-3b	ator Waste Characterization Methods Acceptable Knowledge Radiography and Visual Examination	15
C-4	Data V C-4a	 /erification and Quality Assurance Data Generation and Project Level Verification Requirements C-4a(1) Data Quality Objectives C-4a(2) Quality Assurance Objectives C-4a(3) Data Generation C-4a(4) Data Verification C-4a(5) Data Transmittal C-4a(6) Records Management 	17 17 17 18 18 19
C-5	Permit C-5a	 ttee Level Waste Screening and Verification of TRU Mixed Waste Phase I Waste Stream Screening and Verification C-5a(1) WWIS Description C-5a(2) Examination of the Waste Stream Profile Form and Container Data Checks C-5a(3) Audit and Surveillance Program 	20 21 23
	C-5b	 Phase II Waste Shipment Screening and Verification C-5b(1) Examination of the EPA Uniform Hazardous Waste Manifest and Associated Waste Tracking Information C-5b(2) Examination of the Land Disposal Restriction (LDR) Notice C-5b(3) Verification 	24 25 27
C-6	Permit	ttees' Waste Shipment Screening QA/QC	28
C-7	Record C-7a C-7b	ds Management and Reporting General Requirements Records Storage	29

C-8	Reporting	. 29
C-9	List of References	. 30

LIST OF TABLES

2 Table

Title

- Table C-1 Summary of Parameters, Characterization Methods, and Rationale for
 Transuranic Mixed Waste
- Transuranic Mixed Waste
 Table C-2 Required Program Records Maintained in Generator/Storage Site Project Files
- 6 Table C-3 WIPP Waste Information System Data Fields^a
- 7 Table C-4 Waste Tanks Subject to Exclusion
- 8 Table C-5 Listing of Permitted EPA Hazardous Waste Numbers
- 9

1

10

11

LIST OF FIGURES

12 Figure

Title

- 13 Figure C-1 WIPP Waste Stream Profile Form (Example Only)
- 14 Figure C-2 Waste Characterization Process
- 15 Figure C-3 TRU Mixed Waste Screening and Verification
- 16

ATTACHMENT C

WASTE ANALYSIS PLAN

3 <u>C-0</u> Introduction and Attachment Highlights

1

2

This waste analysis plan (WAP) has been prepared for management, storage, or disposal 4 activities to be conducted at the Waste Isolation Pilot Plant (WIPP) facility to meet requirements 5 set forth in 20.4.1.500 New Mexico Administrative Code (NMAC) (incorporating Title 40 of the 6 Code of Federal Regulations (CFR) §264.13). Guidance in the most recent U.S. Environmental 7 Protection Agency (EPA) manual on waste analysis has been incorporated into the preparation 8 of this WAP (EPA, 19942015). This WAP includes test methods and details of planned waste 9 analysis for complying with the general waste analysis requirements of 20.4.1.500 NMAC 10 (incorporating 40 CFR §264.13), a description of the waste shipment screening and verification 11 process, and a description of the quality assurance (QA)/quality control (QC) program. Before 12 the Permittees manage, store, or dispose transuranic (TRU) mixed waste from a 13 generator/storage site (site), the Permittees shall require that site to implement the applicable 14 requirements of this WAP. 15 TRUTransuranic mixed waste that may be stored or disposed at the WIPP facility are or were 16 generated at U.S. Department of Energy (**DOE**) generator/storage sites by various specific 17 processes and activities. Examples of the major types of operations that generate this waste 18 include: 19 Production of Nuclear Products—Production of nuclear products includes reactor 20 • operation, radionuclide separation/finishing, and weapons fabrication and 21 manufacturing. The majority of the TRU mixed waste was generated by weapons 22 fabrication and radionuclide separation/finishing processes. More specifically, wastes 23 consist of residues from chemical processes, air and liquid filtration, casting, 24 machining, cleaning, product quality sampling, analytical activities, and maintenance 25 and refurbishment of equipment and facilities. 26

- Plutonium Recovery—Plutonium recovery wastes are residues from the recovery of
 plutonium-contaminated molds, metals, glass, plastics, rags, salts used in
 electrorefining, precipitates, firebrick, soot, and filters.
- Research and Development (R&D)—R&D projects include a variety of hot cell or
 glovebox activities that often simulate full-scale operations described above, producing
 similar TRU mixed wastes. Other types of R&D projects include metallurgical research,
 actinide separations, process demonstrations, and chemical and physical properties
 determinations.
- Decontamination and Decommissioning—Facilities and equipment that are no longer needed or usable are decontaminated and decommissioned, resulting in TRU mixed wastes consisting of scrap materials, cleaning agents, tools, piping, filters, Plexiglas™, gloveboxes, concrete rubble, asphalt, cinder blocks, and other building materials.
 These materials are expected to be the largest category by volume of TRU mixed waste to be generated in the future.

1 TRU <u>Transuranic</u> mixed waste contains both TRU radioactive and hazardous components, as

2 defined in Permit Part 1, Section 1.5.7. It is designated and separately packaged as either

3 contact-handled (CH) waste or remote-handled (RH) waste, based on the radiological dose rate

4 at the surface of the waste container.

5 The hazardous components of the TRU mixed waste to be managed at the WIPP facility are 6 designated in Table C-5. Some of the waste may also be identified by unique state hazardous

waste codes or numbers. These wastes are acceptable at the WIPP facility as long as the

8 Treatment, Storage, and Disposal Facility Waste Acceptance Criteria (**TSDF-WAC**) in <u>Permit</u>

9 Part 2 are met. This WAP describes the measures that will be taken to ensure that the TRU

mixed wastes received at the WIPP facility are within the scope of Table C-5 as established by

11 20.4.1.500 NMAC (incorporating 40 CFR <u>§Part 264</u>), and that they comply with unit-specific

requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart X§264.600),

13 Miscellaneous Units).

14 Some TRU mixed waste is retrievably stored at the DOE generator/storage sites. Additional

15 TRU mixed waste will be generated and packaged into containers at these generator/storage

16 sites in the future. TRU mixed waste will be retrieved from storage areas at a DOE

¹⁷ generator/storage site. Retrievably stored waste is defined as TRU mixed waste generated after

18 1970 and before the New Mexico Environment Department (**NMED**) notifies the Permittees, by

approval of the final audit report, that the characterization requirements of the WAP at a

20 generator/storage site have been implemented. Newly generated waste is defined as TRU

mixed waste generated after NMED approves the final audit report for a generator/storage site.

Acceptable knowledge (**AK**) information is assembled for both retrievably stored and newly

generated waste. Waste characterization of retrievably stored TRU mixed waste will beis
 performed on an ongoing basis, as the waste is retrieved. Waste characterization of newly

performed on an ongoing basis, as the waste is retrieved. Waste characterization of newly generated TRU mixed waste is typically performed as it is generated, although some

characterization occurs post-generation.

27 Waste characterization is defined in <u>Permit</u> Part 1 as the activities performed by the waste

generator to satisfy the general waste analysis requirements of 20.4.1.500 NMAC (incorporating

40 CFR §264.13(a)) before waste containers have been certified for disposal at the WIPP

30 <u>facility</u>. The characterization process for WIPP waste is presented in Figure C-2.

31 Generator/<u>storage</u> site waste characterization programs are first audited by DOE, with NMED

approving the final audit report. After this, generator<u>/storage</u> sites determine whether AK alone

is sufficient for characterization, or whether radiography or <u>visual examination (VE)</u> in

conjunction with AK is necessary to adequately characterize wastes. If an AK Sufficiency

35 Determination is sought, information is provided to the Permittees for their review and DOE's

³⁶ provisional approval<u>.</u> <u>An</u>NMED determination of adequacy of the AK information is required

- ³⁷ before final approval by <u>the DOE</u>. If the radiography or VE route is chosen, sites proceed to
- perform radiography or VE in conjunction with AK and in accordance with this WAP. Once an
 AK Sufficiency Determination is obtained, or when required radiography or VE data are

AK Sufficiency Determination is obtained, or when required radiography or VE data are obtained, sites would then prepare and submit the Waste Stream Profile Form (**WSPF**) for the

DOE's approval. Once the WSPF is approved, a site may ship waste to the WIPP facility. The

Permittees will perform waste confirmation prior to shipment of the waste from the

43 generator/storage site to the WIPP facility pursuant to Permit Attachment C7, by performing

radiography or visual examination of a representative subpopulation of certified waste

45 containers, to ensure that the wastes meet the applicable requirements of the TSDF-WAC.

1 <u>C-0a Waste Characterization</u>

2 Characterization requirements for individual containers of TRU mixed waste are specified on a

3 waste stream basis. A waste stream is defined as waste materials that have common physical

- 4 form, that contain similar hazardous constituents, and that are generated from a single process
- 5 or activity. Waste streams are grouped by assigned to Waste Matrix Code Groups related to the
- 6 physical and chemical properties of the waste. Generator/storage sites shall use the
- 7 characterization techniques described in this WAP to assign appropriate Waste Matrix Code
- 8 Groups to waste streams for WIPP disposal. The Waste Matrix Code Groups are solidified
- 9 inorganics, solidified organics, salt waste, soils, lead/cadmium metal, inorganic nonmetal waste,
- 10 combustible waste, graphite, filters, heterogeneous debris waste, and uncategorized metal.
- 11 Waste Matrix Code Groups can be grouped into three Summary Category groups:
- Homogeneous Solids (Summary Category S3000), Soil/Gravel (Summary Category S4000),
- and Debris Waste (Summary Category S5000).
- <u>Transuranic</u>TRU mixed wastes are initially categorized into the three broad Summary Category
 Groups that are related to the final physical form of the wastes. This categorization is based on
 the Summary Category Group constituting the greatest volume of waste for a waste stream.
 Waste characterization requirements for these groups are specified in Section C-2 of this WAP.
 Each of the three groups is described below.

19 <u>S3000 - Homogeneous Solids</u>

- Homogeneous solids are defined as solid materials, excluding soil, that do not meet the 20 NMED criteria for classification as debris (20.4.1.800 NMAC (incorporating 40 CFR 21 §268.2[g] and [h])). Included in the series of homogeneous solids are inorganic process 22 residues, inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams 23 are included in this Summary Category Group based on the specific waste stream types 24 and final waste form. This Summary Category Group is expected to contain toxic metals 25 and spent solvents. This category includes wastes that are at least 50 percent by volume 26 homogeneous solids. 27
- 28 S4000 Soils/Gravel
- This Summary Category Group includes S4000 waste streams that are at least 50 percent by volume soil/gravel. This Summary Category Group is expected to contain toxic metals.

31 S5000 - Debris Wastes Waste

- This Summary Category Group includes heterogeneous waste that is at least 50 percent by volume materials that meet the criteria specified in 20.4.1.800 NMAC (incorporating 40 CFR §268.2 (g)). Debris means solid material exceeding a 2.36 inch (in-) (60 millimeter) particle size that is intended for disposal and that is:
- 36 1. a manufactured object, or
- 37 2. plant or animal matter, or
- 38 3. natural geologic material.
- Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is not a particle of S3000 or S4000 material.

The most common hazardous constituents in the TRU mixed waste to be managed in the WIPP

42 facility consist of the following:

1 <u>Metals</u>

Some of the TRU mixed waste to be emplaced in the WIPP facility contains metals for 2 which 20.4.1.200 NMAC (incorporating 40 CFR §261.24), toxicity characteristics arewere 3 established (EPA hazardous waste numbers D004 through D011). Cadmium, chromium, 4 lead, mercury, selenium, and silver are present in discarded tools and equipment, 5 solidified sludges, cemented laboratory liquids, and waste from decontamination and 6 decommissioning activities. A large percentage of the waste consists of lead-lined 7 gloveboxes, leaded rubber gloves and aprons, lead bricks and piping, lead tape, and other 8 lead items. Lead, because of its radiation-shielding applications, is the most prevalent 9 toxicity-characteristic metal present. 10

11 Halogenated Volatile Organic Compounds

Some of the TRU mixed waste to be emplaced in the WIPP facility contains spent 12 halogenated volatile organic compound (VOC) solvents identified in 20.4.1.200 NMAC 13 (incorporating 40 CFR, §261.31) (EPA hazardous waste numbers F001 through F005). 14 Tetrachloroethylene; trichloroethylene; methylene chloride; carbon tetrachloride; 1,1,1-15 trichloroethane; and 1,1,2-trichloro-1,2,2-trifluoroethane (EPA hazardous waste numbers 16 F001 and F002) are the most prevalent halogenated organic compounds identified in TRU 17 mixed waste that may be managed at the WIPP facility during the Disposal Phase. These 18 compounds are commonly used to clean metal surfaces prior to plating, polishing, or 19 fabrication; to dissolve other compounds; or as coolants. Because they are highly volatile, 20 only small amounts typically remain on equipment after cleaning or, in the case of treated 21 wastewaters, in the sludges after clarification and flocculation. Radiolysis may also 22 generate halogenated volatile organic compounds. 23

24 Nonhalogenated Volatile Organic Compounds

Xylene, methanol, and n-butanol are the most prevalent nonhalogenated VOCs in TRU
 mixed waste that may be managed at the WIPP facility during the Disposal Phase. Like
 the halogenated VOCs, they are used as degreasers and solvents and are similarly
 volatile. The same analytical methods that are used for halogenated VOCs are used to
 detect the presence of nonhalogenated VOCs. Radiolysis may also generate non halogenated volatile organic compounds.

- The generator/storage sites shall characterize their waste in accordance with this WAP and associated Permit Attachments, and ensure that waste proposed for storage and disposal at <u>the</u> WIPP<u>facility</u> meets the applicable requirements of the TSDF-WAC in <u>Permit</u> Part 2<u>. Section</u> <u>2.3.3</u>. The generator/storage site shall assemble the <u>Acceptable Knowledge (AK)</u> information into an auditable record¹ for the waste stream as described in Permit Attachment C4. For those waste streams with an approved AK Sufficiency Determination (see below), radiography or VE per the methods described in Permit Attachments<u>Attachment</u> C1 is not required.
- All waste<u>Waste</u> characterization activities specified in this WAP and associated Permit
 Attachments shall be carried out at generator/storage sites in accordance with this WAP. <u>The</u>

¹ "Auditable records" mean those records which allow the Permittees to conduct a systematic assessment, analysis, and evaluation of the Permittees' compliance with the WAP and this Permit.

- 1 DOE will audit generator/storage site waste characterization programs and activities as
- 2 described in Section C-3. Waste characterization activities at the generator/storage sites include
- 3 the following, as discussed in Section C-3:
- Radiography, which is an x-ray technique to determine physical contents of containers
- Visual examination of opened containers as an alternative way to determine their physical contents
- 7 Compilation of AK documentation into an auditable record

8 <u>C-0b AK Sufficiency Determination</u>

23

24

25

26

27

28

29

30

- 9 Generator/storage sites may submit a request to the Permittees for an AK Sufficiency
- 10 Determination (Determination Request) to be exempt from the requirement to perform

radiography or visual examination (VE) based on AK. The contents of the Determination

Request are specified in Permit Attachment C4, Section C4-3d.

The Permittees shall evaluate the Determination Request for completeness and technical adequacy. This evaluation shall include, but not be limited to_{\pm} whether the Determination

15 Request is technically sufficient for the following:

- The Determination Request must include all-information specified in Permit
 Attachment C4, Section C4-3d
- The AK Summary must identify relevant hazardous constituents, and must
 correctly identify all-toxicity characteristic and listed hazardous waste numbers-
- All hazardous <u>Hazardous</u> waste number assignments must be substantiated by
 supporting data and, if not, whether this lack of substantiation compromises the
 interpretation.
 - Resolution of data discrepancies between different AK sources must be technically correct and documented.
 - The AK Summary must include-all the identification of waste material parameter weights by percentage of the material in the waste stream, and determinations must be technically correct-
 - <u>All prohibited</u> Prohibited items specified in the TSDF-WAC should be addressed, and conclusions drawn must be technically adequate and substantiated by supporting information.
- If the AK record includes process control information specified in Permit
 Attachment C4, Section C4-3b, the information should include procedures, waste
 manifests, or other documentation demonstrating that the controls were adequate
 and sufficient.

1 2 3 The site must provide the supporting information necessary to substantiate technical conclusions within the Determination Request, and this information must be correctly interpreted.

The Permittees will review the Determination Request for technical adequacy and compliance with the requirements of the Permit, using trained and qualified individuals in accordance with standard operating procedures that shall, at a minimum, address all of the technical and procedural requirements listed above. The Permittees shall resolve comments with the generator/storage site.

If <u>the</u> DOE determines that the AK is sufficient, it shall inform the public of the Determination Request, the Permittees' evaluation of it, and the date and time of a public meeting to provide information to and solicit comments from interested members of the public regarding the Determination Request. Notice of the meeting and comment period shall be provided by the following methods:

- 13 following methods:
- 14 1. Written notice to all individuals on the facility mailing list;
- Public notice in area newspapers, including the Carlsbad Current-Argus,
 Albuquerque Journal, and Santa Fe New Mexican
- 17 3. Notice <u>as specified in Permit Part 1, Section 1.11</u>on the WIPP Home Page;
- 18 4. E-mail notification as specified in Permit Part 1, Section 1.11-

¹⁹ <u>The DOE shall take written comment on the Determination Request for at least 30 days</u>

following the public meeting. DOE shall compile all-such comments, including any disagreement between the DOE and commenters.

If the DOE provisionally approves the Determination Request, it may forward it along with all 22 relevant information submitted with the Determination Request to NMED for an evaluation that 23 the provisional approval made by DOE is adequate. The DOE shall also provide to NMED, as a 24 separate appendix to the Determination Request, the compilation of all-comments and DOE's 25 response to each comment. After submitting a Determination Request to the NMED, the 26 Permittees will post a link to the transmittal letter to the NMED as specified in Permit Part 1. 27 Section 1.11. on the WIPP Home Page and inform those on the e-mail notification list as 28 specified in Permit Section 1.11. The NMED will evaluate the Determination Request, determine 29 the adequacy of the Determination Request, and notify the DOE as to whether or not it concurs 30 with its provisional approval. Based on the results of NMED's evaluation, the Permittees will 31 notify the generator/storage sites whether the AK information is sufficient and the Determination 32 Request is approved. The DOE will not approve a Determination Request that NMED has 33 determined to be inadequate unless the generator/storage site resolves the inadequacies and 34 provides the resolution to NMED for evaluation of adequacy. Should the inadequacies not be 35 resolved to NMED's satisfaction, the DOE shall not submit a Determination Request for the 36 same waste stream at a later date. The DOE shall not submit a Determination Request if a 37 previous Determination Request is pending evaluation by the NMED. 38

In the event <u>the DOE</u> disagrees, in whole or in part, with an evaluation performed by <u>the NMED</u> resulting in a determination by <u>the NMED</u> that <u>the DOE</u>'s provisional approval for a particular

41 waste stream is inadequate, DOE may seek dispute resolution. The dispute resolution process

- is specified in <u>Permit</u> Part 1. <u>Section 1.16</u>. The Secretary's final decision under Permit <u>Part 1.</u>
- 2 Section 1.16.4 shall constitute a final agency action.

By July 1 of each year, the Permittees shall submit to <u>the</u> NMED a list of waste streams <u>that</u> the Permittees may submit for an AK Sufficiency Determination during the upcoming federal fiscal year, <u>only if there are actual plans to seek an AK Sufficiency Determination; otherwise no action</u> is required. The Permittees will post a link to the transmittal letter to <u>the</u> NMED and announce a public meeting to discuss the list with interested members of the public on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

If a generator/storage site does not submit a Determination Request, or if <u>the</u>DOE does not
 approve a Determination Request, or if <u>the</u>NMED finds that <u>the</u>DOE's provisional approval of a
 Determination Request is inadequate, the generator/storage site shall perform radiography or
 VE on 100% of the containers in a waste stream.

If a generator/storage site submits a Determination Request, <u>the DOE</u> provisionally approves
 the Determination Request and <u>the NMED</u> finds that <u>the DOE</u>'s provisional approval is

adequate, neither radiography nor VE of the waste stream is required.

16 <u>C-0c Waste Stream Profile Form Completion</u>

After a complete AK record has been compiled and either a Determination Request has been approved by <u>the</u> DOE or the generator/storage site has completed the applicable testing
 requirements specified in Permit Attachments C1₁ the generator/storage site will complete a
 Waste Stream Profile Form (WSPF) and <u>a</u> Characterization Information Summary (CIS). The
 requirements for the completion of a WSPF and a CIS are specified in Permit Attachment C3,

22 Sections C3-6b(1) and C3-6b(2) respectively.

²³ The WSPF and the CIS for the waste stream resulting from waste characterization activities

shall be transmitted to the Permittees, who shall review them for completeness, and screen

them for acceptance prior to loading any TRU mixed waste into the Contact-Handled<u>CH</u> or

²⁶ Remote-Handled<u>RH</u> Packaging at the generator facility, as described in Section C-4. The

27 review and approval process will ensure that the submitted waste analysis information is

sufficient to meet the Data Quality Objectives (**DQOs**) for AK in Section C-4a(1) and allow the
 Permittees to demonstrate compliance with the requirements of this WAP. Only TRU mixed

Permittees to demonstrate compliance with the requirements of this WAP. Only TRU mixed
 waste and TRU waste that has been characterized in accordance with this WAP and that meets

the TSDF-WAC specified in this Permit will be accepted at the WIPP facility for disposal in a

permitted Underground Hazardous Waste Disposal Unit (**HWDU**). <u>The</u>DOE will approve and

provide NMED with copies of the approved WSPF and accompanying CIS prior to waste stream

shipment. Upon notification of <u>the DOE</u>'s approval of the WSPF, the generator/storage site may

be authorized to ship waste to the WIPP <u>facility</u>.

³⁶ In the event the Permittees request detailed information on a waste stream, the site will provide

a Waste Stream Characterization Package (<u>Permit Attachment C3,</u> Section C3-6b(<u>3</u>2)). For

each waste stream, this package will include the WSPF, the CIS, and the complete AK

39 summary. The Waste Stream Characterization Package will also include specific Batch Data

40 Reports (**BDRs**) and raw data associated with waste container characterization as requested by

41 the Permittees.

1 <u>C-0d Waste Confirmation</u>

- 2 The Permittees will perform waste confirmation on a representative subpopulation of each
- 3 waste stream shipment after certification and prior to shipment pursuant to Permit Attachment
- 4 C7. The Permittees will use radiography, review of radiography audio/video recordings, VE, or
- 5 review of VE records (e.g., VE data sheets or packaging logs) to examine at least 7<u>seven</u>
- 6 percent of each waste stream shipment to confirm that the waste does not contain ignitable,
- 7 corrosive, or reactive waste. Waste confirmation will be performed by the Permittees prior to
- 8 shipment of the waste from the generator/storage site to <u>the WIPP facility</u>.
- 9 C-1 Identification of TRU Mixed Waste to be Managed at the WIPP Facility
- 10 <u>C-1a Waste Stream Identification</u>
- 11 **TRU**<u>Transuranic</u> mixed waste destined for disposal at <u>the</u> WIPP <u>facility</u> will be characterized on
- a waste stream basis. Generator/storage sites will delineate waste streams using acceptable
- ¹³ knowledge<u>AK</u>. Required acceptable knowledge<u>AK</u> is specified in Section C-3a and Permit
- 14 Attachment C4.

15 <u>C-1b</u> Waste Summary Category Groups and Hazardous Waste Accepted at the WIPP Facility

Once a waste stream has been delineated, generator/storage sites will assign a Waste Matrix

17 Code to the waste stream based on the physical form of the waste. Waste streams are then

- assigned to one of three broad Summary Category Groups; S3000-Homogeneous Solids,
- 19 S4000-Soils/Gravel, and S5000-Debris Wastes. These Summary Category Groups are used to
- 20 determine further characterization requirements.

The Permittees will only allow generators to ship those TRU mixed waste streams with EPA

hazardous waste numbers listed in Table C-5. Some of the waste may also be identified by

23 unique state hazardous waste codes or numbers. These wastes are acceptable at <u>the WIPP</u>

²⁴ <u>facility</u> as long as the TSDF-WAC are met. The Permittees will require sites to perform

characterization of all-waste streams as required by this WAP. If during the characterization

process, new EPA hazardous waste numbers are identified, those wastes will be prohibited for

disposal at the WIPP facility until a permit modification has been submitted to and approved by
 NMED for these new EPA hazardous waste numbers. Similar waste streams at other

NMED for these new EPA hazardous waste numbers. Similar waste streams at other generator/storage sites will be examined by the Permittees to ensure that the newly identified

EPA hazardous waste numbers do not apply to those similar waste streams. If the other waste

streams also require new EPA hazardous waste numbers, shipment of these similar waste

streams will also be prohibited for disposal <u>at the WIPP facility</u> until a permit modification has

- been submitted to and approved by the NMED.
- 34 <u>C-1c Waste Prohibited at the WIPP Facility</u>
- ³⁵ The following TRU mixed waste wastes are prohibited at the WIPP facility:
- liquid waste is not acceptable at <u>the WIPP facility</u>. Liquid in the quantities delineated
 below is acceptable:
- Observable liquid shall be no more than <u>1one</u> percent by volume of the outermost
 container at the time of radiography or visual examination

1 2		 Internal containers with more than 60 milliliters or 3<u>three</u> percent by volume observable liquid, whichever is greater, are prohibited
3 4		 Containers with Hazardous Waste Number U134 assigned shall have no observable liquid
5 6 7		 Overpacking the outermost container that was examined during radiography or visual examination or redistributing untreated liquid within the container shall not be used to meet the liquid volume limits
8	•	non-radionuclide pyrophoric materials, such as elemental potassium
9 10	•	hazardous wastes not occurring as co-contaminants with TRU mixed wastes (non- mixed hazardous wastes)
11 12	•	wastes incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other wastes
13	•	wastes containing explosives or compressed gases
14 15	•	wastes with polychlorinated biphenyls (PCBs) not authorized under an EPA PCB waste disposal authorization
16 17	•	wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA Hazardous Waste Numbers of D001, D002, or D003)
18 19	•	waste that has ever been managed as high-level waste and waste from tanks specified in Table C-4, unless specifically approved through a Class 3 permit modification
20 21 22 23	•	any waste container from a waste stream (or waste stream lot) which has not undergone either radiographic or visual examination of a statistically representative subpopulation of the waste stream in each shipment, pursuant to Permit Attachment C7
24 25	•	any waste container from a waste stream which has not been preceded by an appropriate, certified WSPF (see Section C-1d)
26 27 28 29	confirma confirm	accepting a container holding TRU mixed waste, the Permittees will perform waste ation activities pursuant to Permit Attachment C7 on each waste stream shipment to that the waste does not contain ignitable, corrosive, or reactive waste and the assigned zardous waste numbers are allowed for storage and disposal by this Permit. Waste

confirmation activities will be performed on at least 7 seven percent of each waste stream 30

shipped, equating to examination of at least one of fourteen containers in each waste stream 31

shipment. If a waste stream shipment contains fewer than fourteen containers, one container 32 will be examined to satisfy waste confirmation requirements. Section C-4 and Permit 33

Attachment C7 include descriptions of the waste confirmation processes that the Permittees will 34

conduct prior to receiving a shipment at the WIPP facility. 35

Containers are vented through filters, allowing any gases that are generated by radiolytic and 36 37

microbial processes within a waste container to escape, thereby preventing over pressurization

- or development of conditions within the container that would lead to the development of 1
- 2 ignitable, corrosive, reactive, or other characteristic wastes.
- To ensure the integrity of the WIPP facility, waste streams identified to contain incompatible 3
- materials or materials incompatible with waste containers cannot be shipped to the WIPP facility 4
- unless they are treated to remove the incompatibility. Only those waste streams that are 5
- compatible or have been treated to remove incompatibilities will be shipped to the WIPP facility. 6

C-1d Control of Waste Acceptance 7

Every waste stream shipped to the WIPP facility shall be preceded by a WSPF (Figure C-1) and 8 a CIS. The required WSPF information and the CIS elements are found in Permit Attachment 9

- C3. Section C3-6b(1) and Section C3-6b(2). 10
- Generator/storage sites will provide the WSPF to the Permittees for each waste stream prior to 11
- its acceptance for disposal at the WIPP facility. The WSPF and the CIS will be transmitted to the 12
- Permittees for each waste stream from a generator/storage site. If continued waste 13
- characterization reveals discrepancies that identify different EPA hazardous waste numbers or 14
- indicates that the waste belongs to a different waste stream, the waste will be redefined to a 15
- separate waste stream and a new WSPF submitted. Generator/storage sites will develop criteria 16
- to determine the specific circumstances under which a WSPF is revised versus when a new 17
- WSPF is required. These criteria will be evaluated by DOE during site audits (Attachment C6). 18
- The Permittees are responsible for the review of WSPFs and CISs to verify compliance with the 19
- restrictions on TRU mixed wastes destined for disposal at the WIPP facility. for WIPP disposal. 20
- The DOE will approve and submit completed WSPFs to the NMED prior to waste stream 21
- shipment. The Permittees will be responsible for the review of shipping records (Section C-5) to 22
- ensure that each waste container has been prepared and characterized in accordance with 23 applicable provisions of this WAP. Waste characterization data shall ensure the absence of
- 24 prohibited items specified in Section C-1c. 25
- Any time the Permittees request additional information concerning a waste stream, the 26
- generator/storage site will provide a Waste Stream Characterization Package (Permit 27
- Attachment C3, Section C3-6b(32)). The option for the Permittees to request additional 28
- information ensures that the waste being offered for disposal is adequately characterized and 29
- accurately described on the WSPF. 30

C-1e Waste Generating Processes at the WIPP Facility 31

- Waste generated as a result of the waste containers handling and processing activities at the 32
- WIPP facility is termed "derived" waste. Because derived wastes can contain only those RCRA-33
- regulated materials present in the waste from which they were derived, no additional 34
- characterization of the derived waste is required for disposal purposes. In other words, the 35
- generator/storage site's characterization data and knowledge of the processes at the WIPP 36
- facility will be used to identify and characterize hazardous waste and hazardous constituents in 37
- derived waste. The management of derived waste is addressed in Permit Attachment A1. 38

1 <u>C-2</u> Waste Characterization Program Requirements and Waste Characterization Parameters

The Permittees shall require the sites to develop the procedure(s) which specify their programmatic waste characterization requirements. <u>The</u> DOE will evaluate the procedures during audits conducted under the Audit and Surveillance Program (Section C-5a(3)) and may also evaluate the procedures as part of the review and approval of the WSPF. Sites must notify the Permittees and obtain DOE approval prior to making data-affecting modifications to procedures (Permit Attachment C3, Section C3-9). Program procedures shall address the following minimum elements:

 Waste characterization and certification procedures for retrievably stored and newly generated wastes to be sent to the WIPP facility

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

- Methods used to ensure prohibited items are documented and managed.: <u>These these</u> will include procedures for performing radiography, VE, or treatment, if these methods are used to ensure prohibited items are not present in the waste prior to shipment of the waste to <u>the</u> WIPP <u>facility</u>.
 - Identify the organization(s) responsible for compliance with waste characterization and certification procedures.
 - Identify the oversight procedures and frequency of actions to verify compliance with waste characterization and certification procedures.
 - Develop training specific to waste characterization and certification procedures-
 - Ensure that personnel may stop work if noncompliance with waste characterization or certification procedures is identified.
 - Develop a nonconformance process that complies with the requirements in Permit Attachment C3 of the WAP to document and establish corrective actions.
 - As part of the corrective action process, assess the potential time frame of the noncompliance, the potentially affected waste population(s), and the reassessment and recertification of those wastes.
- A listing of all-approved <u>EPA</u> hazardous waste numbers which are acceptable at <u>the</u> WIPP<u>facility</u> are included in Table C-5-

For those waste streams or containers that are not amenable to radiography (e.g., RH TRU mixed waste, direct loaded ten-drum overpacks (**TDOPs**)) for waste confirmation by the Permittees pursuant to Permit Attachment C7, generator/storage site VE data may be used for waste acceptance. In those cases, the Permittees will review the generator/storage site VE procedures to ensure that data sufficient for the Permittees' waste acceptance activities pursuant to Permit Attachment C7 will be obtained and the procedures meet the minimum requirements for visual examination specified in Permit Attachment C1, Section C1-<u>2</u>1.

The following waste characterization parameters shall be obtained from the generator/storage sites:

- Determination whether TRU mixed waste streams comply with the applicable
 provisions of the TSDF-WAC
- Determination whether TRU mixed wastes exhibit a hazardous characteristic
 (20.4.1.200 NMAC, incorporating 40 CFR <u>§Part</u> 261, Subpart C)
- Determination whether TRU mixed wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR <u>§Part</u> 261, Subpart D)
- 7 Estimation of waste material parameter weights

Table C-1 provides the parameters of interest for the various constituent groupings and testing
 methodologies. The following sections provide a description of the acceptable methods to
 evaluate these parameters for each waste Summary Category Group.

11 <u>C-3 Generator Waste Characterization Methods</u>

12 The characterization techniques used by generator/storage sites includes acceptable

13 knowledge<u>AK</u> and may also include, as necessary, radiography and visual examination<u>VE</u>. All

14 characterization <u>Characterization</u> activities are performed in accordance with the WAP. Table C-

15 1 provides a summary of the characterization requirements for TRU mixed waste.

16 <u>C-3a Acceptable Knowledge</u>

- Acceptable knowledge (AK) is used in TRU mixed waste characterization activities in five the
 following ways:
- To delineate TRU mixed waste streams
- To assess whether TRU mixed wastes comply with the TSDF-WAC
- To assess whether TRU mixed wastes exhibit a hazardous characteristic (20.4.1.200 NMAC, incorporating 40 CFR <u>§Part 261</u> Subpart C)
- To assess whether TRU mixed wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR <u>§Part</u>261, Subpart D)
- To estimate waste material parameter weights

Acceptable knowledge is discussed in detail in Permit Attachment C4, which outlines the minimum set of requirements and DQOs which shall be met by the generator/storage sites in order to use acceptable knowledge<u>AK</u>. In addition, Section C-5a(3) of this permit attachment describes the assessment of acceptable knowledge<u>AK</u> through the Audit and Surveillance Program.

- 31 C-3b Radiography and Visual Examination
- Radiography and visual examination (VE)VE are nondestructive qualitative and quantitative
- techniques used to identify and verify waste container contents as specified in Permit
- Attachment C1. Generator/storage sites shall perform radiography or VE of 100 percent of CH

TRU mixed waste containers in waste streams except for those waste streams for which the 1 2 DOE approves a Determination Request. No RH TRU mixed waste will be shipped to the WIPP facility for storage or disposal without documentation of radiography or VE of 100 percent of the 3 containers as specified in Permit Attachment C1. Radiography and/or VE will be used, when 4 necessary, to examine a waste container to verify the physical form of the waste matches its 5 waste stream description as determined by AK. These techniques can detect observable liquid 6 in excess of TSDF-WAC limits and containerized gases, which are prohibited from disposal at 7 the WIPP facility for WIPP disposal. The prohibition of liquid in excess of TSDF-WAC limits and 8 containerized gases prevents the shipment of corrosive, ignitable, or reactive wastes. 9 Radiography and/or VE are also able to verify that the physical form of the waste matches its 10 waste stream description (i.e. Homogeneous Solids, Soil/Gravel, or Debris Waste [including 11 uncategorized metals]). If the physical form does not match the waste stream description, the 12 waste will be designated as another waste stream and assigned the preliminary EPA hazardous 13 waste numbers associated with that new waste stream assignment. That is, if radiography 14 and/or VE indicates that the waste does not match the waste stream description arrived at by 15 acceptable knowledgeAK characterization, a non-conformance report (NCR) will be completed 16 and the inconsistency will be resolved as specified in Permit Attachment C4, and the NCR will 17 be dispositioned as specified in Permit Attachment C3, Section C3-7. The proper waste stream 18 assignment will be determined (including preparation of a new WSPF), the correct hazardous 19 waste numbers will be assigned, and the resolution will be documented. Refer to Permit 20 Attachment C4 for a discussion of acceptable knowledgeAK and its verification process. 21

For generator/storage sites that use VE, the detection of any liquid in non-transparent internal 22 containers, detected from shaking the internal container, will be handled by assuming that the 23 internal container is filled with liquid and adding this volume to the total liquid in the container 24 being characterized using VE. The container being characterized using VE would be rejected 25 and/or repackaged to exclude the internal container if it is over the TSDF-WAC limits. When 26 radiography is used, or visual examination VE of transparent containers is performed, if any 27 28 liquid in internal containers is detected, the volume of liquid shall be added to the total for the container being characterized using radiography or VE. Radiography, or the equivalent, will be 29 used as necessary on the existing/stored waste containers to verify the physical characteristics 30 of the TRU mixed waste correspond with its waste stream identification/waste stream Waste 31 Matrix Code and to identify prohibited items. Radiographic examination protocols and QA/QC 32 methods are provided in Permit Attachment C1. Radiography and VE shall be subject to the 33 Audit and Surveillance Program (Permit Attachment C6). 34

35 C-4 Data Verification and Quality Assurance

The Permittees will ensure that applicable waste characterization processes performed by generator/storage sites sending TRU mixed waste to the WIPP <u>facility</u> for disposal meets WAP requirements through data validation, usability and reporting controls. Verification occurs at three levels: 1) the data generation level, 2) the project level, and 3) the Permittee level. The validation and verification process and requirements at each level are described in Permit Attachment C3, Section C3-4. The validation and verification process at the Permittee <u>levelLevel</u> is also described in Section C-5.

1 <u>C-4a</u> Data Generation and Project Level Verification Requirements

2 <u>C-4a(1) Data Quality Objectives</u>

The waste characterization data obtained through WAP implementation will be used to ensure that the Permittees meet regulatory requirements with regard to both regulatory compliance and to ensure that all-TRU mixed wastes are properly managed during the Disposal Phase. To satisfy the RCRA regulatory compliance requirements, the following DQOs are established by this WAP:

- Acceptable Knowledge
 - To delineate TRU mixed waste streams.
- To assess whether TRU mixed wastes comply with the applicable requirements of
 the TSDF-WAC-
- To assess whether TRU mixed wastes exhibit a hazardous characteristic
 (20.4.1.200 NMAC, incorporating 40 CFR <u>§Part</u>261, Subpart C).
- To assess whether TRU mixed wastes are listed (20.4.1.200 NMAC, incorporating
 40 CFR §Part 261, Subpart D)-
- 16 To estimate waste material parameter weights-
- Radiography and VE
- To verify the TRU mixed waste streams contain no prohibited items and to verify
 that physical form of the waste matches the waste stream description as
 determined by AK-

Reconciliation of these DQOs by the Generator/Storage Site Project Manager, as applicable, is addressed in Permit Attachment C3. Reconciliation requires determining whether sufficient type, quality, and quantity of data have been collected to ensure the DQOs cited above can be achieved.

- 25 <u>C-4a(2)</u> Quality Assurance Objectives
- 26 The generator/storage sites shall demonstrate compliance with each Quality Assurance
- 27 Objective (QAO) associated with the characterization methods as presented in Permit

Attachment C3. Generator/Storage Site Project Managers are further required to perform a

reconciliation of the data with the DQOs established in this WAP. The Generator/Storage Site

³⁰ Project Manager shall conclude that all of the DQOs have been met for the characterization of

the waste stream prior to submitting a WSPF to DOE for approval (Permit Attachment C3). The

following QAO elements shall be considered for each technique, as a minimum:

- 33 Precision
- 34

9

Precision is a measure of the mutual agreement among multiple measurements.

- <u>Accuracy</u>
- 2

1

3

4

5

6

7

8

9

10 11 Accuracy is the degree of agreement between a measurement result and the true or known value.

- <u>Completeness</u>
- Completeness is a measure of the amount of valid data obtained from a method compared to the total amount of data obtained that is expressed as a percentage.
- <u>Comparability</u>
- Comparability is the degree to which one data set can be compared to another-
- <u>Representativeness</u>
- Representativeness expresses the degree to which data represent characteristics of a population-

A more detailed discussion of the QAOs can be found in Permit Attachment C3, which describes the QAOs associated with each test method.

14 <u>C-4a(3) Data Generation</u>

¹⁵ BDRsBatch data reports, in a format approved by DOE, will be used by each generator/storage

site for reporting waste characterization data. This format will be included in the

17 generator/storage site <u>Quality Assurance Project Plan (</u>QAPjP), controlled electronic databases,

or procedures referenced in the QAPjP (Permit Attachment C5) and will include all of the

elements required by this WAP for <u>BDRBDRs</u> (Permit Attachment C3).

20 <u>The</u> DOE shall perform audits of the generator/storage site waste characterization programs, as 21 implemented by the generator/storage site QAPjP, to verify compliance with the WAP and the 22 DQOs in this WAP (See Permit Attachment C6 for a discussion of the content of the audit 23 program). The primary functions of these audits are to review generator/storage sites' 24 adherence to the requirements of this WAP and ensure adherence to the WAP characterization 25 program. <u>The</u> DOE shall provide the results of each audit to NMED. If audit results indicate that 26 a generator/storage site is not in compliance with the requirements of this WAP, <u>the</u> DOE will 27 take appropriate action as specified in Permit Attachment C6

take appropriate action as specified in Permit Attachment C6.

28 <u>C-4a(4) Data Verification</u>

BDRsBatch data reports will document the testing results from the required characterization activities, and document required QA/QC activities. Data validation and verification at both the data-generation level and the project level will be performed as required by this Permit before the required data are transmitted to the Permittees (Permit Attachment C3). <u>The</u>NMED may request, through the Permittees, copies of any BDR, and/or the raw data validated by the generator/storage sites, to check <u>the</u>DOE's audit of the validation process.

1 <u>C-4a(5) Data Transmittal</u>

2 BDRsBatch data reports will include the information required by Permit Attachment C3, Section

3 C3-4 and will be transmitted by hard copy or electronically (provided a hard copy is available on

4 demand) from the data generation level to the project level.

5 The generator/storage site will-transmits waste container information electronically via the WIPP

6 Waste Information System (**WWIS**). Data will be entered into the WWIS in the exact format

7 required by the database. Refer to Section C-5a(1) for WWIS reporting requirements and the

8 *Waste Data System User's Manual* (DOE, <u>20092019</u>) for the WWIS data fields and format

9 requirements.

10 Once a waste stream is characterized, the Site Project Manager will also submit to the

11 Permittees a WSPF (Figure C-1) accompanied by the CIS for that waste stream which includes

reconciliation with DQOs (<u>Permit Attachment C3</u>, Sections C3-6b(1) and C3-6b(2)). The WSPF,

the CIS, and information from the WWIS will be used as the basis for acceptance of waste

characterization information on TRU mixed wastes to be disposed of at the WIPP <u>facility</u>.

15 C-4a(6) Records Management

16 Records related to waste characterization activities performed by the generator/storage sites will

be maintained in the testing facility files or generator/storage site project files, or at the WIPP

18 Records Archive facility. Raw data obtained by testing TRU mixed waste in support of this WAP

19 will be identifiable, legible, and provide documentary evidence of quality. TRUTransuranic mixed

20 waste characterization records submitted to the Permittees shall be maintained in the WIPP

facility operating record<u>Operating Record</u> and be available for inspection by <u>the</u>NMED.

Records inventory and disposition schedule (**RIDS**) or an equivalent system shall be prepared

and approved by generator/storage site personnel. <u>All recordsRecords</u> relevant to an

enforcement action under this Permit, regardless of disposition, shall be maintained at the

25 generator/storage site until <u>the NMED</u> determines they are no longer needed for enforcement

action, and then dispositioned as specified in the approved RIDS. All waste<u>Waste</u>

27 characterization data and related QA/QC records for TRU mixed waste to be shipped to the

28 WIPP facility are designated as either Lifetime Records or Non-Permanent Records.

29 Records that are designated as Lifetime Records shall be maintained for the life of the waste

characterization program at a participating generator/storage site plus six years or transferred

for permanent archival storage to the WIPP Records Archive facility.

Waste characterization records include historical characterization records (i.e. headspace gas sampling/analysis and homogeneous solids and soil/gravel sampling/analysis) generated through implementation of previous requirements in this WAP. Those waste characterization records designated as Non-Permanent Records shall be maintained for ten years from the date of (record) generation at the participating generator/storage site or at the WIPP Records Archive facility and then dispositioned according to their approved RIDS. If a generator/storage site ceases to operate, all-records shall be transferred before closeout to the Permittees for

management at the WIPP Records Archive facility. Table C-2 is a listing of records designated

as Lifetime Records and Non-Permanent Records. Classified information will not be transferred

to <u>the WIPP facility</u>. Notations will be provided to the Permittees indicating the absence of

classified information. The approved generator/storage site RIDS-will identify appropriate

disposition of classified information. Nothing in this Permit is intended to, nor should it be

- 2 interpreted to, require the disclosure of any U.S. Department of Energy classified information to
- ³ persons without appropriate clearance to view such information.

4 <u>C-5 Permittee Level Waste Screening and Verification of TRU Mixed Waste</u>

5 Permittee waste screening is a two-phased process. Phase I will occur prior to configuring

6 shipments of TRU mixed waste. Phase II will occur after configuration of shipments of TRU

7 mixed waste but before it is disposed at the WIPP facility. Figure C-3 presents Phase I and a

8 portion of Phase II of the TRU mixed waste screening process. Permit Attachment C7 presents

⁹ the TRU mixed waste confirmation portion of Phase II activities.

10 <u>C-5a</u> Phase I Waste Stream Screening and Verification

The first phase of the waste screening and verification process will occur before TRU mixed 11 waste is shipped to the WIPP facility. Before the Permittees begin the process of accepting TRU 12 mixed waste from a generator/storage site, an initial audit of that generator/storage site will be 13 conducted as part of the Audit and Surveillance Program (Permit Attachment C6). The RCRA 14 portion of the generator/storage site audit program will provide on-site verification of 15 characterization procedures; BDR preparation; and recordkeeping to ensure that all-applicable 16 provisions of the WAP requirements are met. Another portion of the Phase I verification is the 17 WSPF approval process. At the WIPP facility, this process includes verification that all of the 18 required elements of the WSPF and the CIS are present (Permit Attachment C3, C3-6b(1)) and 19 that the waste characterization information meet acceptance criteria required for compliance 20 with the WAP (Section C3-6b(1)). 21

A generator/storage site must first prepare a QAPiP, which includes applicable WAP 22 requirements, and submit it to DOE for review and approval (Permit Attachment C5). Once 23 approved, a copy of the QAPiP is provided to NMED for examination. The generator/storage 24 site will implement the specific parameters of the QAPjP after it is approved. An initial audit will 25 be performed after QAPjP implementation and prior to the generator/storage site being certified 26 for shipment of waste to the WIPP facility. Additional Subsequent audits, focusing on the results 27 of waste characterization, will be performed at least annually. The DOE has the right to conduct 28 unannounced audits and to examine any records that are related to the scope of the audit. See 29 Section C-5a(3) and Permit Attachment C6 for further information regarding audits. 30

When the required waste stream characterization data have been collected by a 31 generator/storage site and the initial generator/storage site audit has been successfully 32 completed, the generator/storage Site Project Manager will verify that waste stream 33 characterization meets the applicable WAP requirements as a part of the project level 34 verification (Permit Attachment C3, Section C3-4b). If the waste characterization does not meet 35 the applicable requirements of the WAP, the mixed waste stream cannot be managed, stored, 36 or disposed at the WIPP facility until those requirements are met. The Site Project Manager will 37 then complete a WSPF and submit it to the Permittees, along with the accompanying CIS for 38 39 that waste stream (Permit Attachment C3, Section C3-6b(1)). All dataData necessary to check the accuracy of the WSPF will be transmitted to the Permittees for verification. This provides 40 notification that the generator/storage site considers that the waste stream (identified by the 41 waste stream identification number) has been adequately characterized for disposal prior to 42 shipment to the WIPP facility. The Permittees will compare radiographic and visual examination 43 data obtained subsequent to submittal and approval of the WSPF (and prior to submittal) with 44

- 1 characterization information presented on this form. If the Permittees determine (through the
- 2 data comparison) that the characterization information is adequate, DOE will approve the
- 3 WSPF. Prior to the first shipment of containers from the approved waste stream, the approved
- 4 WSPF and accompanying CIS will be provided to NMED. If the data comparison indicates that
- 5 analyzed containers have hazardous wastes not present on the WSPF, or a different Waste
- 6 Matrix Code applies, the WSPF is in error and shall be resubmitted. Ongoing WSPF
- 7 examination is discussed in detail in Section C-5a(2).
- 8 Audits of generator/storage sites will be conducted as part of the Audit and Surveillance
- 9 Program (Permit Attachment C6). The RCRA portion of the generator/storage site audit program
- 10 will provide on-site verification of waste characterization procedures; BDR preparation; and
- record keeping to ensure that all-applicable provisions of the WAP requirements are met. As
- part of the waste characterization data submittal, the generator/storage site will also transmit the
- data on a container basis via the WWIS. This data submittal can occur at any time as the data
- are being collected, but will be complete for each container prior to shipment of that container.
- The WWIS will conduct internal edit/limit checks as the data are entered, and the data will be
- available to the Permittees as supporting information for WSPF review. <u>The NMED will have</u>
- 17 read-only access to the WWIS as necessary to determine compliance with the WAP. The initial
- WSPF check performed by the Permittees will include WWIS data submitted by the
 generator/storage site for each waste container submitted for the WSPF review and the CIS.
- generator/storage site for each waste container submitted for the WSPF review and the CIS.
 The Permittees will compare ongoing characterization data obtained and submitted via the
- 21 WWIS to the approved WSPF. If this comparison shows that containers have hazardous wastes
- not reported on the WSPF, or a different Waste Matrix Code applies, the data are rejected and
- the waste containers are not accepted for shipment until a new or revised WSPF is submitted to
- the Permittees and approved by the DOE.
- If discrepancies regarding hazardous waste number assignment or Waste Matrix Code designation arise as a result of the Phase I review, the generator/storage sites will be contacted by the Permittees and required to provide the necessary additional information to resolve the discrepancy before that waste stream is approved for disposal at the WIPP facility. If the discrepancy is not resolved, the waste stream will not be approved. <u>The DOE</u> will notify <u>the</u>
- NMED in writing of any discrepancies identified during WSPF review and the resulting
- discrepancy resolution prior to waste shipment. The Permittees will not manage, store, or
- dispose the waste stream until this discrepancy is resolved in accordance with this WAP.

33 <u>C-5a(1) WWIS Description</u>

- All generator/storage sites planning to ship TRU mixed waste to <u>the WIPP facility</u> will supply the required data to the WWIS. The WWIS Data Dictionary includes all of the data fields, the field format and the limits associated with the data as established by this WAP. These data will be
- subjected to edit and limit checks that are performed automatically by the database, as defined
- in the Waste Data System User's Manual (DOE, <u>2019</u>2009).
- ³⁹ The Permittees will coordinate the data transmission with each generator/storage site. Actual
- data transmission will use appropriate technology to ensure the integrity of the data
- transmissions. The Permittees will require sites with large waste inventories and large
- databases to populate a data structure provided by the Permittees that contains the required
- data dictionary fields that are appropriate for the waste stream (or waste streams) at that site.
- The Permittees will access these data via the Internet to ensure an efficient transfer of this data.
- 45 Small quantity sites will be given a similar data structure by the Permittees that is tailored to

their types of waste. Sites with very small quantities of waste will be provided with the ability to assemble the data interactively to this data structure on the WWIS.

The Permittees will use the WWIS to verify that all of the supplied data meet the edit and limit 3 checks prior to the shipment of any TRU mixed waste to the WIPP facility. The WWIS 4 automatically will notify the generator/storage site if any of the supplied data fails to meet the 5 requirements of the edit and limit checks via an appropriate error message. The 6 generator/storage site will be required to correct the discrepancy with the waste or the waste 7 data and re-transmit the corrected data prior to acceptance of the data by the WWIS. The 8 Permittees will review data reported for each container of each shipment prior to providing 9 notification to the shipping generator/storage site that the shipment is acceptable. Read-only 10 access to the WWIS will be provided to NMED. Table C-3 contains a listing of the data fields 11 contained in the WWIS that are required as part of this Permit. 12

- 13 The WWIS will generate the following:
- Waste Emplacement Report
- This report will be added to the operating record Operating Record to track the 15 guantities of waste, date of emplacement, and location of authorized containers or 16 container assemblies in the repository. The Permittees will document the specific 17 panel room or drift that an individual waste container is placed in as well as the 18 row/column/height coordinates location of the container or containers assembly. This 19 report will be generated on a weekly basis. Locations of containers or container 20 assemblies will also be placed on a map separate from the WWIS. Reports and maps 21 that are included as part of the operating record Operating Record will be retained at 22 the WIPP site by the Permittees, for the life of the facility. 23
- Shipment Summary Report
- This report will contain the container identification numbers (**IDs**) of every container in the shipment, listed by Shipping Package number and by assembly number (for seven-packs, four-packs, and three-packs), for every assembly in the Shipping Package. This report is used by the Permittees to verify containers in a shipment and will be generated on a shipment basis.
- Waste Container Data Report
- This report will be generated on a waste stream basis and will be used by the Permittees during the WSPF review and DOE approval process. This report will contain the data listed in the Characterization Module on Table C-3. This report will be generated and attached to the WSPF for inclusion in the facility operating recordOperating Record and will be kept for the life of the facility.
 - Reports of Change Log

36

This will consist of a short report that lists the user ID and the fields changed. The report will also include a reason for the change. A longer report will list the information provided on the short report and include a before and after image of the record for

- each change, a before-record for each deletion, and the new information for added
 records. These reports will provide an auditable trail for the data in the database.
- Access to the WWIS will be controlled by the Permittees' Data Administrator (**DA**) who will control the WWIS users based on approval from management personnel. Training for the WWIS
- 5 Data Administrator job position will be in accordance with the WWIS Retrieval Characterization
- 6 Transportation Data Administrator Task Card on file at the WIPP facility.
- The TRU mixed waste generator/storage sites will only have access to data that they have
 supplied, and only until the data have been formally accepted by the Permittees. After the data
- have been accepted, the data will be protected from indiscriminate change and can only be
- 10 changed by an authorized DA.
- The WWIS has a Change Log that requires a reason for the change from the DA prior to accepting the change. The data change information, the user ID of the authorized DA making the change, and the date of the change will be recorded in the data change log automatically. The data change log cannot be revised by any user, including the DA. The data change log will be subject to internal and external audits and will provide an auditable trail for all changes made to previously approved data.

17 <u>C-5a(2)</u> Examination of the Waste Stream Profile Form and Container Data Checks

The Permittees will-verify the completeness and accuracy of the Waste Stream Profile Form 18 (Section C3-6b(1)). Figure C-2 includes the waste characterization and waste stream approval 19 process. The assignment of the waste stream description, Waste Matrix Code Group, and 20 Summary Category Groups; the acceptable knowledge summary documentation; the methods 21 used for characterization; the DOE certification, and the appropriate designation of EPA 22 hazardous waste number(s) will be examined by the Permittees. If the WSPF is inaccurate, 23 efforts will be made to resolve discrepancies by contacting the generator/storage site in order 24 for the waste stream to be eligible for shipment to the WIPP facility. If discrepancies in the waste 25 stream are detected at the generator/storage site, the generator/storage site will implement a 26 non-conformance program to identify, document, and report discrepancies (Permit Attachment 27 C3). 28

The WSPF shall pass all-verification checks by the Permittees in order for the waste stream to be approved by DOE for shipment to the WIPP facility. The WSPF check against waste container data will occur during the initial WSPF approval process (Section C-5a).

The EPA hazardous waste numbers for the wastes that appear on the Waste Stream Profile 32 Form will be compared to those in Table C-5 to ensure that only approved wastes are accepted 33 for management, storage, or disposal at the WIPP facility. Some of the waste may also be 34 identified by unique state hazardous waste codes or numbers. These wastes are acceptable at 35 WIPP as long as the TSDF-WAC are met. The CIS will be reviewed by the Permittees to verify 36 that the waste has been classified correctly with respect to the assigned EPA hazardous waste 37 38 numbers. The Permittees will verify that the applicable requirements of the TSDF-WAC have been met by the generator/storage site. 39

- Waste data transferred via the WWIS after WSPF approval will be compared with the approved
 WSPF. Any container from an approved hazardous waste stream with a description different
- 42 from its WSPF will not be managed, stored, or disposed at <u>the WIPP facility</u>.

The Permittees will also verify that three different types of data specified below are available for 1 2 every container holding TRU mixed waste before that waste is managed, stored, or disposed at WIPP: 1) an assignment of the waste stream's waste description (by Waste Matrix Codes) and 3 Waste Matrix Code Group; 2) a determination of ignitability, reactivity, and corrosivity; and 3) a 4 determination of compatibility. The verification of waste stream description will be performed by 5 reviewing the WWIS for consistency in the waste stream description and WSPF. The CIS will 6 indicate if the waste has been checked for the characteristics of ignitability, corrosivity, and 7 reactivity. The final verification of waste compatibility will be performed using Appendix C1 of the 8 WIPP RCRA Part B Permit Application (DOE, 1997), the compatibility study. 9

Any container with unresolved discrepancies associated with hazardous waste characterization will not be managed, stored, or disposed at the WIPP facility until the discrepancies are resolved. If the discrepancies cannot be resolved, DOE will revoke the approval status of the waste stream, suspend shipments of the waste stream, and notify NMED. Waste stream approval will not be reinstated until the generator/storage site demonstrates all-<u>that</u> corrective actions have been implemented and the generator/storage site waste characterization program

16 is reassessed by <u>the Permittees</u>-DOE.

17 <u>C-5a(3) Audit and Surveillance Program</u>

An important part of the Permittees' verification process is the Audit and Surveillance Program. 18 The focus of this audit program is compliance with this WAP and the Permit. This audit program 19 addresses all-AK implementation and testing activities, from waste stream classification 20 assignment through waste container certification, and ensures compliance with SOPs and the 21 WAP. Audits will ensure that containers and their associated documentation are adequately 22 tracked throughout the waste handling process. Operator gualifications will be verified, and 23 implementation of QA/QC procedures will be surveyed. A final report that includes 24 generator/storage site audit results and applicable WAP-related corrective action report (CAR) 25 resolution will be provided to NMED for approval, and will be kept in the WIPP facility operating 26 recordOperating Record until closure of the WIPP facility. 27 The DOE will perform an initial audit at each generator/storage site performing waste 28 characterization activities prior to the formal acceptance of the WSPFs and/or any waste 29 characterization data supplied by the generator/storage sites. Audits will be performed at least 30

- annually thereafter, including the possibility of unannounced audits (i.e., not a regularly
- scheduled audit). These audits will allow NMED to verify that the Permittees have implemented
- the WAP and that generator/storage sites have implemented a QA program for the
- 34 characterization of waste and meet applicable WAP requirements. The accuracy of physical
- waste description and waste stream assignment provided by the generator/storage site will be
- verified by review of the radiography results, and visual examination of data records and
- radiography images (as necessary) during audits conducted by DOE. More detail on this audit
- process is provided in Permit Attachment C6.

39 <u>C-5b Phase II Waste Shipment Screening and Verification</u>

- 40 As presented in Figure C-3, Phase II of the waste shipment screening and verification process
- 41 begins with confirmation of the waste pursuant to Permit Attachment C7 after waste shipments
- are configured. After the waste shipment has arrived, the Permittees will screen the shipments
- to determine the completeness and accuracy of the EPA Hazardous Waste Manifest and the
- land disposal restriction notice completeness. The Permittees will verify there are no waste

- 1 shipment irregularities and the waste containers are in good condition. Only those waste
- 2 containers that are from shipments that have been confirmed pursuant to Permit Attachment C7
- and that pass all-Phase II waste screening and verification determinations will be emplaced at
- 4 WIPP. For each container shipped, the Permittees shall ensure that the generator/storage sites
- 5 provide the following information:
- 6 Hazardous Waste Manifest Information:
- 7 Generator/storage site name and EPA ID
- 8 Generator/storage site contact name and phone number
- 9 Quantity of waste
- 10 List of up to six state and/or federal hazardous waste numbers in each line item
- 11 Listing of all-shipping container IDs (Shipping Package serial number)
- Signature of authorized generator representative
- 13 Specific Waste Container information:
- 14 Waste Stream Identification Number
- 15 List of Hazardous Waste Numbers per Container
- 16 Certification Data
- Shipping Data (Assembly numbers, ship date, shipping category, etc.)
- 18 This information shall also be supplied electronically to the WWIS. The container-specific
- information will be supplied electronically as described in Section C-5a(1), and shall be supplied
 prior to the Permittees' management, storage, or disposal of the waste.
- 21 The Permittees will verify each approved shipment upon receipt at <u>the WIPP facility</u> against the
- data on the WWIS shipment summary report to ensure containers have the required
- information. A Waste Receipt Checklist will be used to document the verification.

24 <u>C-5b(1)</u> Examination of the EPA Uniform Hazardous Waste Manifest and Associated Waste 25 <u>Tracking Information</u>

- Upon receipt of a TRU mixed waste shipment, the Permittees will make a determination of EPA
 Uniform Hazardous Waste Manifest completeness and sign the manifest to allow the driver to
 depart. For CH TRU mixed waste, the Permittees will then make a determination of waste
 shipment completeness by checking the unique, bar-coded identification number found on each
 containerwaste containers
 holding TRU mixed waste against the WWIS database after opening
- 31 the Shipping Package.
- The WWIS links the bar-coded identification numbers of all containers in a specific waste
- 33 shipment to the waste assembly (for 7<u>seven</u>-packs, 4<u>four</u>-packs, 3<u>three</u>-packs and 5<u>five</u>-drum
- carriages) and to the shipment identification number, which is also written on the EPA
- 35 Hazardous Waste Manifest.
- ³⁶ For shipments in the RH-TRU 72B cask, the identification number of the single payload
- 37 container is read during cask-to-cask transfer in the Transfer Cell and then checked against the
- 38 WWIS database. For shipments in the CNS 10-160B cask, the Permittees will make a

1 determination of waste shipment completeness by checking the unique identification number

- 2 found on each container holding TRU mixed waste in the Hot Cell against the WWIS database
- 3 after unloading the cask.
- Generators electronically transmit the waste shipment information to the WWIS before the TRU
 mixed waste shipment is transported. Once a TRU mixed waste shipment arrives, the
- 6 Permittees verify the identity of each cask or container (or one container in a bound 7<u>seven</u>-
- 7 pack, 4<u>four</u>-pack, or <u>3three</u>-pack) using the data already in the WWIS.

8 The WWIS will maintain waste container receipt and emplacement information provided by the 9 Permittees. It will include, among other items, the following information associated with each 10 container of TRU mixed waste:

- Package Inner Containment Vessel <u>(ICV)</u> or shipping cask closure date
- Package (container or canister) receipt date
- Overpack identification number (if appropriate)
- <u>Container or canister</u> Package (container or canister) emplacement date
- <u>Container or canister</u> Package (container or canister) emplacement location

Manifest discrepancies will be identified during manifest examination and container bar-code 16 WWIS data comparison. A manifest discrepancy is a difference between the quantity or type of 17 hazardous waste designated on the manifest and the quantity or type of hazardous waste the 18 WIPP facilityPermittees actually receives. The generator/storage site technical contact (as listed 19 on the manifest) will be contacted to resolve the discrepancy. If the discrepancy is identified 20 prior to the containers being removed from the package or shipping cask, the waste will be 21 retained in the parking area. If the discrepancy is identified after the waste containers are 22 removed from the package or cask, the waste will be retained in the Waste Handling Building 23 24 (WHB) until the discrepancy is resolved. Errors on the manifest can be corrected by the Permittees at the WIPP facility with a verbal (followed by a mandatory written) concurrence by 25 the generator/storage site technical contact. All dDiscrepancies that are unresolved within 26 27 fifteen (15) days of receiving the waste will be immediately reported to the NMED in writing. Notifications to the NMED will consist of a letter describing the discrepancies, discrepancy 28 resolution, and a copy of the manifest. If the manifest discrepancies have not been resolved 29 within thirty (30) days of waste receipt, the shipment will be returned to the generator/storage 30 facility. If it becomes necessary to return waste containers to the generator/storage site, a new 31 EPA Uniform Hazardous Waste Manifest may be prepared by the Permittees. 32

- Documentation of the returned containers will be recorded in the WWIS. Changes will be made to the WWIS data to indicate the current status of the container(s). The reason for the WWIS data change and the record of the WWIS data change will be maintained in the change log of the WWIS, which will provide an auditable record of the returned shipment.
- The Permittees will be responsible for the resolution of discrepancies, notification of <u>the</u>NMED, as well as returning the original copy of the manifest to the generator/storage site.

1 <u>C-5b(2)</u> Examination of the Land Disposal Restriction (LDR) Notice

TRUTransuranic mixed waste designated by the Secretary of Energy for disposal at the WIPP 2 facility is exempt from the LDRs by the WIPP Land Withdrawal Act Amendment (Public Law 3 104-201). This amendment states that WIPP "Waste is exempted from treatment standards 4 promulgated pursuant to section 3004(m) of the Solid Waste Disposal Act (42 U.S. C. 6924(m)) 5 and shall not be subjected to the Land Disposal prohibitions in section 3004(d), (e), (f), and (g) 6 of the Solid Waste Disposal Act." Therefore, with the initial shipment of a TRU mixed waste 7 stream, the generator shall provide the Permittees with a one time written notice. The notice 8 must include the information listed below: 9

- 10 Land Disposal Restriction Notice Information:
- EPA Hazardous Waste Number(s) and Manifest Numbers of first shipment of a mixed waste stream
- Statement: this waste is not prohibited from land disposal
- Date the waste is subject to prohibition

15 This information is the applicable information taken from column "268.7(a)(4)" of the "Generator

Paperwork Requirements Table" in 20.4.1.800 NMAC (incorporating 40 CFR §268.7(a)(4)).

Note that item "5" from the "Generator Paperwork Requirements Table" is not applicable since

18 waste analysis data are provided electronically via the WWIS and item "7" is not applicable

since waste designated by the Secretary of Energy for disposal at <u>the WIPP facility</u> is exempted

20 from the treatment standards.

21 The Permittees will review the LDR notice for accuracy and completeness. The generator will

prepare this notice in accordance with the applicable requirements of 20.4.1.800 NMAC

- 23 (incorporating 40 CFR §268.7(a)(4)).
- 24 <u>C-5b(3) Verification</u>

²⁵ The Permittees will make a determination of TRU mixed waste shipment irregularities. The

- following items will be inspected for each TRU mixed waste shipment arriving at the WIPP facility:
- Whether the number and type of containers holding TRU mixed waste match the information in the WWIS
- Whether the containers are in good condition

The Permittees will verify that the containers (as identified by their container ID numbers) are 31 the containers for which accepted data already exists in the WWIS. A check will be performed 32 by the Permittees comparing the data on the WWIS Shipment Summary Report for the 33 shipment to the actual shipping papers (including the EPA Hazardous Waste Manifest). This 34 check also verifies that the containers included in the shipment are those for which approved 35 shipping data already exist in the WWIS Transportation Data Module (Table C-3). For standard 36 waste boxes (SWBs) and ten drum overpacks (TDOPs), this check will include comparing the 37 barcode on the container with the container number on the shipping papers and the data on the 38

1 WWIS Shipment Summary Report. For 7<u>seven</u>-pack assemblies, one of the seven container

- 2 barcodes will be read by the barcode reader and compared to the assembly information for this
- 3 container on the WWIS Shipment Summary Report. This will automatically identify the
- 4 remaining six containers in the assembly. This process enables the Permittees to identify all of
- the containers in the assembly with minimum radiological exposure. If all of the container IDs
- and the information on the shipping papers agree with the WWIS Shipment Summary Report, and the shipment was subject to waste confirmation by the Permittees prior to shipment to the
- and the shipment was subject to waste confirmation by the Permittees prior to shipment to <u>the</u>
 WIPP <u>facility</u> -pursuant to Permit Attachment C7, the containers will be approved for storage
- and disposal at the WIPP facility.

10 <u>C-6</u> Permittees' Waste Shipment Screening QA/QC

11 Waste shipment screening QA/QC ensures that TRU mixed waste received is that which has 12 been approved for shipment during the Phase I and Phase II screening. This is accomplished by

maintaining QA/QC control of the waste shipment screening process. The screening process

14 will be controlled by administrative processes which will generate records documenting waste

¹⁵ receipt that will become part of the waste receipt record. The waste receipt record documents

that container identifications correspond to shipping information and approved TRU mixed

17 waste streams. The Permittees will extend QA/QC practices to the management of all-records

associated with waste shipment screening determinations.

19 C-7 Records Management and Reporting

As part of the WIPP facility's operating record Operating Record, data and documents

associated with waste characterization and waste confirmation are managed in accordance with

22 standard records management practices.

All waste Waste characterization data for each TRU mixed waste container transmitted to the 23 WIPP facility shall be maintained by the Permittees for the active life of the WIPP facility plus 24 two years. The active life of the WIPP facility is defined as the period from the initial receipt of 25 TRU mixed waste at the facility until NMED receives certification of final closure of the facility. 26 After their active life, the records shall be retired to the WIPP Records Archive facility and 27 maintained for 30 years. These records will then be offered to the National Archives. However, 28 this disposition requirement does not preclude the inclusion of these records in the permanent 29 marker system or other requirements for institutional control. 30

The storage of the Permittees' copy of the manifest, LDR information, waste characterization data, WSPFs, waste confirmation activity records, and other related records will be identified on the appropriate records inventory and disposition schedule<u>RIDS</u>.

- The following records will be maintained for waste characterization and waste confirmation purposes as part of the WIPP facility operating record<u>Operating Record</u>:
- Completed WIPP WSPFs and accompanying CIS, including individual container data
 as transferred on the WWIS (or received as hard-copy) and any discrepancy-related
 documentation as specified in Section C-5a
- Radiography and visual examination records (data sheets, packaging logs, and video and audio recordings) of waste confirmation activities

1

- Completed Waste Receipt Checklists and discrepancy-related documentation as • 2 specified in Section C-5b
- WIPP WWIS Waste Emplacement Report as specified in Section C-5a(1) 3
- Audit reports and corrective action reports from the Audit and Surveillance Program 4 audits as specified in Section C-5a(3) and Permit Attachment C6 5
- CARs-Corrective action reports and closure information for corrective actions taken 6 due to nonconforming waste being identified during waste confirmation by the 7 Permittees 8
- These records will be maintained for all-TRU mixed waste managed at the WIPP facility. 9
- Waste characterization and waste confirmation data and documents related to waste 10

characterization that are part of the WIPP facility operating record Operating Record are 11

- managed in accordance with the following guidelines: 12
- C-7a General Requirements 13
- Records shall be legible 14
- Corrections shall be made with a single line through the incorrect information, and the 15 date and initial of the person making the correction shall be added 16
- Black ink is encouraged, unless a copy test has been conducted to ensure the other 17 color ink will copy 18
- Use of highlighters on records is discouraged 19
- Records shall be reviewed for completeness 20
- Records shall be validated by the cognizant manager or designee 21 •
- C-7b Records Storage 22
- Active records shall be stored when not in use 23
- Quality records shall be kept in a one-hour (certified) fire-rated container or a copy of a 24 record shall be stored separately (sufficiently remote from the original) in order to 25 prevent destruction of both copies as a result of a single event such as fire or natural 26 disaster 27
- Unauthorized access to the records is controlled by locking the storage container or 28 controlling personnel access to the storage area 29
- C-8 Reporting 30
- The Permittees will provide a biennial report in accordance with 20.4.1.500 NMAC 31
- (incorporating 40 CFR §264.75) on EPA Form 8700-13 A/B to the NMED that includes 32
- information on TRU mixed waste volume and waste descriptions received for disposal during 33
- the time period covered by the report previous year. 34

1 <u>C-9 List of References</u>

- U.S. Department of Energy (DOE), <u>2019</u>2009, "Waste Data System User's Manual_±",
 DOE/WIPP 09-3427, U.S. Department of Energy.
- 4 U.S. Department of Energy (DOE), 1997, Resource Conservation and Recovery Act Part B
- 5 Permit Application for the Waste Isolation Pilot Plant", Revision 6.5, U.S. Department of Energy.
- 6 U.S. Environmental Protection Agency (EPA), April 1994, "Waste Analysis at Facilities that

7 Generate, Treat, Store, and Dispose of Hazardous Waste, a Guidance Manual," <u>OSWER</u>

8 9938.4-03, Office of Solid Waste and Emergency Response, Washington, D.C.<u>U.S.</u>

9 Environmental Protection Agency (EPA), April 2015, EPA 530-R-12-001, "Waste Analysis at

- 10 Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes Final, A Guidance
- 11 <u>Manual," Office of Solid Waste and Emergency Response, Washington, D.C.</u>
- U.S. Environmental Protection Agency (EPA), April 1980_±- "A Method for Determining the
- 13 Compatibility of Hazardous Wastes," <u>EPA-600/2-80-076</u>, California Department of Health
- 14 Services and the U.S. Environmental Protection Agency, Office of Research and Development.

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

1

TABLES

Table C-1 Summary of Parameters, Characterization Methods, and Rationale for Transuranic Mixed Waste

Waste Matrix Code Summary Categories	Waste Matrix Code Groups	Characterization Parameter	Method	Rationale
S3000-Homogeneous Solids	Solidified inorganics		Acceptable knowledge, radiography and/or visual	
	Salt waste	Physical waste form		Determine waste matrix
	 Solidified organics 	examination examination		Demonstrate compliance with waste acceptance criteria (e.g., no liquid in excess of TSDF-WAC limits, no incompatible wastes, no compressed gases)
S4000-Soil/Gravel	Contaminated soil/debris			
S5000–Debris Waste	 Uncategorized metal (metal waste other than lead/cadmium) 			
	 Lead/cadmium waste 	Hazardous constituents	Acceptable knowledge	Determine assignment of EPA
	 Inorganic nonmetal waste 	Listed		hazardous waste numbers
	Combustible waste	Characteristic		
	Graphite waste			
	 Heterogeneous debris waste 			
	Composite filter waste			

1 2

Table C-2

Required Program Records Maintained in Generator/Storage Site Project Files

Lifetime Records

- Field sampling data forms
- Field and laboratory chain-of-custody forms
- Test facility and laboratory batch data reports
- Waste Stream Characterization Package
- Sampling Plans
- Data reduction, validation, and reporting documentation
- Acceptable knowledge documentation
- Waste Stream Profile Form and Characterization Information Summary

Non-Permanent Records

- Nonconformance documentation
- Variance documentation
- Assessment documentation
- Gas canister tags
- Methods performance documentation
- Performance Demonstration Program documentation
- Sampling equipment certifications
- Calculations and related software documentation
- Training/qualification documentation
- QAPjPs (generator/storage sites) documentation (includingall revisions)
- Calibration documentation
- Analytical raw data
- Procurement documentation
- QA procedures (<u>includingall</u> revisions)
- Technical implementing procedures (<u>includingall</u> revisions)
- Audio/video recording (radiography, visual, etc.)

 Table C-3

 WIPP Waste Information System Data Fields^a

Characterization Module Data Fields ^b		
Container ID ^c Generator EPA ID Generator Address Generator Name Generator Contact <u>EPA Hazardous Waste Number</u> Hazardous Code Layers of Packaging Liner Exists Liner Hole Size Filter Model Number of Filters Installed Item Description Code <u>Haz. Hazardous Waste</u> Manifest Number NDE Complete ^e	Transporter EPA ID Transporter Name Visual Exam Container ^e Waste Material Parameter ^d Waste Material Weight ^d Waste Matrix Code Waste Matrix Code Group Waste Stream Profile Number	
Certification Module Data Fields		
Container ID ° Container type Container Weight Contact Dose Rate Container Certification date Container Closure Date	Handling Code	
Transportation Data Module		
Contact Handled Package Number Assembly Number ^f Container IDs ^{c,d} ICV Closure Date	Ship Date Receive Date	
Disposal Module Data		
Container ID ° Disposal Date Disposal Location		

^a This is not a complete list of the WWIS data fields.

^b Some of the fields required for characterization are also required for certification and/or transportation.

^c Container ID is the main relational field in the WWIS Database.

^d This is a multiple occurringrecurring field for each waste material parameter, nuclide, etc.

^e These are logical fields requiring only a yes/no.

^f Required for 7<u>seven</u>-packs of 55-gal drums, 4<u>four</u>-packs of 85-gal drums, or <u>3three</u>-packs of 100-gal drums to tie all of-the drums in that assembly together. This facilitates the identification of waste containers in a shipment without need to breakup the assembly.

3

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

1 2

Table C-4 Waste Tanks Subject to Exclusion

Hanford Site - 177 Tanks		
A-101 through A-106	C-201 through C-204	
AN-101 through AN-107	S-101 through S-112	
AP-101 through AP-108	SX-101 through SX-115	
AW-101 through AW-106	SY-101 through SY-103	
AX-101 through AX-104	T-101 through T-112	
AY-101 through AY-102	T-201 through T-204	
B-101 through B-112	TX-101 through TX-118	
B-201 through B-204	TY-101 through TY-106	
BX-101 through BX-112	U-101 through U-112	
BY-101 through BY-112	U-201 through U-204	
C-101 through C-112		
Savannah River Site - 51 Tanks		
Tank 1 through 51		
Idaho National Engineering and Environmental Laboratory - 15 Tanks		
WM-103 through WM-106	WM-180 through 190	

Table C-5
Listing of Permitted <u>EPA</u> Hazardous Waste Numbers

EPA Hazardous Waste Numbers			
F001	D019	D043	U079
F002	D021	P015	U103
F003	D022	P030	U105
F004	D026	P098	U108
F005	D027	P099	U122
F006	D028	P106	U133*
F007	D029	P120	U134*
F009	D030	U002*	U151
D004	D032	U003*	U154*
D005	D033	U019*	U159*
D006	D034	U037	U196
D007	D035	U043	U209
D008	D036	U044	U210
D009	D037	U052	U220
D010	D038	U070	U226
D011	D039	U072	U228
D018	D040	U078	U239*

* Acceptance of U-numbered wastes listed for reactivity, ignitability, or corrosivity characteristics is contingent upon a demonstration that the wastes no longer exhibit the characteristic of reactivity, ignitability, or corrosivity.

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

2

1

FIGURES

Page 1 of 2

WASTE STREAM PROFILE FORM

Waste Stream Profile Number:			
Generator <u>/Storage</u> Site Name:	T	Fechnical Contract:	
Generator/Storage Site EPA ID:	Т	Technical Contact Phone Number:	
Date of audit report approved by N	MED:		
Title, version number and date of d	ocuments used for WAP Cert	ification	
Did your facility generate this waste			
If no, provide the name and EPA ID) of the original generator:		
	<u></u>	Cata nam / Chaun	
WIPP ID: Waste Stream Name:	Summary	Category Group	
Waste Stream Name:			
Description from the WTWBIR:			
Defense Waste: □ Yes □ No	Check one: CH CH CH		
		Number of Canisters	
Batch Data Report numbers suppo		cterization:	
List applicable FPA Hazardous Wa	ste Numbers ⁽²⁾		
Applicable TRUCON Content Num	bers:		
Acceptable Knowledge Informati			
(for the following, enter supporting	documentation used (i.e., refe	rences and dates))	
Required Program Information			
Map of site:			
Facility mission description:			
Description of operations that gene	rate waste:		
Waste Identification/categorization	schemes:		
Types and quantities of waste gene	erated:		
Correlation of waste streams gener	ated from the same building a	and process, as applicable	
Waste certification procedures:			
Required Waste Stream Informat			
Area(s) and building(s) from which	waste stream was generated:		
Waste stream volume and time per	iod of generation:		
Waste generating process descript	ion for each building:		
Waste process flow diagrams:			
Material inputs or other information	identifying chemical/radionuc	clide content and physical waste form:	
Waste material parameter estimate			
Which Defense Activity generated t			
Vveapons activities incli Naval reactors develop	uding defense inertial confiner	ment iusion	
LI INAVAI reactors develop	ment		

- □ Verification and control technology
- Defense research and development
- Defense nuclear waste and material by products management
- □ Defense nuclear material production
- Defense nuclear waste and materials security and safeguards and security investigations

Figure C-1 WIPP Waste Stream Profile Form (Example Only)

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

Page 2 of 2

WASTE STREAM PROFILE FORM

Supplemental Documentation
Process design documents:
Standard operating procedures:
Safety Analysis Reports:
Waste packaging logs:
Test plans/research project reports:
Site data bases:
Information from site personnel:
Standard industry documents:
Previous analytical data:
Material safety data sheets:
Sampling and analysis data from comparable/surrogate waste:
Laboratory notebooks:

Confirmation Information⁽²⁾

(for the following, when applicable, enter procedure title(s), number(s), and date(s))

Radiography:

Visual Examination:

Waste characterization procedures used (procedure number, revision number, date):

Waste Stream Profile Form Certification

I hereby certify that I have reviewed the information in this Waste Stream Profile Form, and it is complete and accurate to the best of my knowledge. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Site Project Manager

Printed Name and Title

Date

NOTE: (1) (2)

Use back of sheet or continuation sheets, if required. If, radiography, visual examination were used to confirm EPA Hazardous Waste Numbers, attach signed Characterization Information Summary documenting this determination.

Figure C-1 WIPP Waste Stream Profile Form (Example Only – Continued)

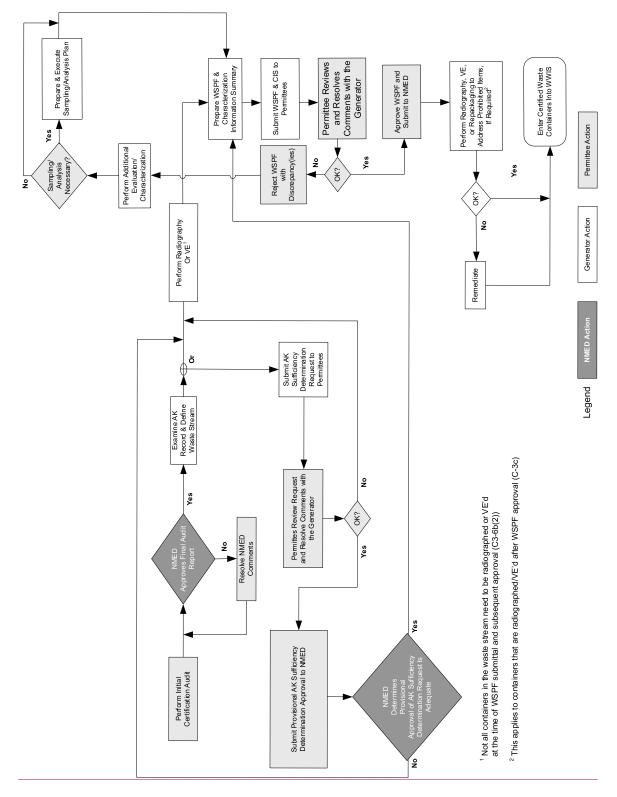


Figure C-2 Waste Characterization Process

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

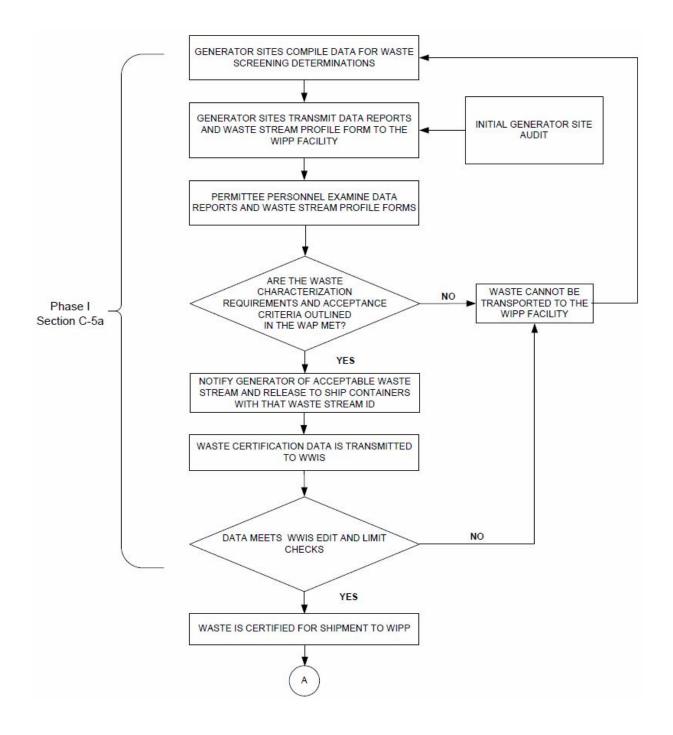


Figure C-3 TRU Mixed Waste Screening and Verification

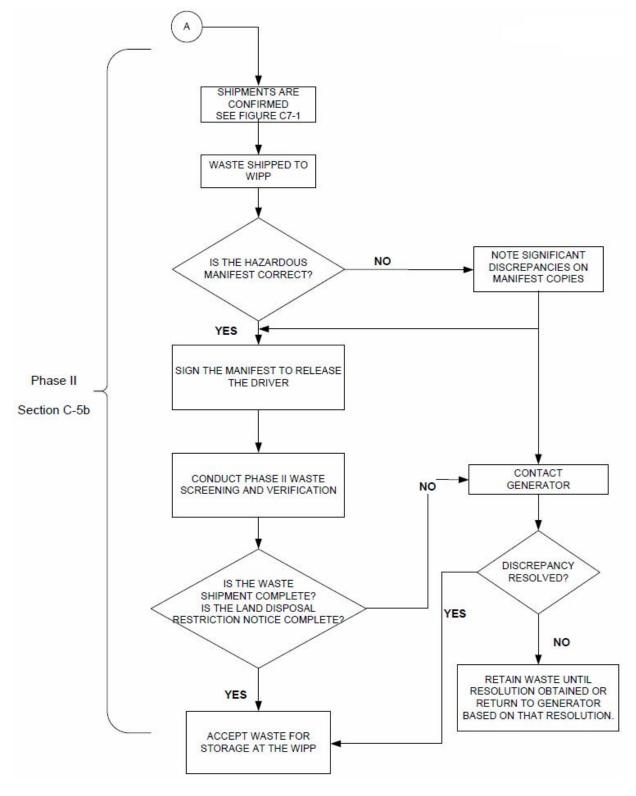


Figure C-3 TRU Mixed Waste Screening and Verification (Continued)

WASTE CHARACTERIZATION TESTING METHODS

WASTE CHARACTERIZATION TESTING METHODS

TABLE OF CONTENTS

Introduction		
C1-1	Radiography	2
C1-2	Visual Examination	4

2

1

WASTE CHARACTERIZATION TESTING METHODS

3 Introduction

4 The Permittees will require generator/storage sites (sites) to use the following testing methods,

as applicable, for characterization of <u>transuranic</u>TRU mixed waste, which is managed, stored, or

6 disposed at <u>the WIPP facility</u>. These methods include requirements for radiography or visual

7 examination. Additionally, this Attachment provides quality control requirements.

8 C1-1 Radiography

Radiography has been developed by the Permittees specifically to aid in the examination and
 identification of containerized waste. The Permittees shall require that sites describe all
 activities required to achieve the radiography objectives in site <u>Quality Assurance Project Plans</u>
 (QAPjPs) and <u>standard operating procedures (SOPs</u>). These SOPs should include instructions
 specific to the radiography system(s) used at the site. For example, to detect liquids, some
 systems require the container to be rotated back and forth while other systems require the
 container to be tilted.

A radiography system (e.g., real time radiography, digital radiography/computed tomography) 16 normally consists of an X-ray-producing device, an imaging system, an enclosure for radiation 17 protection, a waste container handling system, an audio/video recording system, and an 18 operator control and data acquisition station. Although these six components are required, it is 19 expected there will be some variation within a given component between sites. The radiography 20 system shall have controls or an equivalent process which allow the operator to control image 21 22 quality. On some radiography systems, it should be possible to vary the voltage, typically between 150 to 400 kilovolts (kV), to provide an optimum degree of penetration through the 23 waste. For example, high-density material should be examined with the X-ray device set on the 24 maximum voltage. This ensures maximum penetration through the waste container. Low-density 25 material should be examined at lower voltage settings to improve contrast and image definition. 26 The imaging system typically utilizes either a fluorescent screen and a low-light television 27 camera or x-ray detectors to generate the image. 28

To perform radiography, the waste container is scanned while the operator views the television 29 screen. A video and audio recording is made of the waste container scan and is maintained as a 30 non-permanent record. A radiography data form is also used to document the Waste Matrix 31 Code to ensure that the waste container contains no ignitable, corrosive, or reactive waste by 32 documenting the absence of liquids in excess of Treatment, Storage, and Disposal Facility 33 Waste Acceptance Criteria (TSDF-WAC) limits or compressed gases, and verify that the 34 35 physical form of the waste is consistent with the waste stream description documented in the Acceptable Knowledge (AK) Summary. Containers whose contents prevent full examination of 36 the remaining contents shall be subject to visual examination unless the site certifies that visual 37 examination would provide no additional relevant information for that container based on the 38 acceptable knowledgeAK information for the waste stream. Such certification shall be 39

documented in the generator/storage site's record.

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

- 1 For containers which contain classified shapes and undergo radiography, the radiography video
- 2 and audio recording will be considered classified. The radiography data forms will not contain
- 3 classified information.
- 4 The radiography system involves qualitative and semiquantitative evaluations of visual displays.
- 5 Operator training and experience are the most important considerations for ensuring quality
- 6 controls in regard to the operation of the radiography system and for interpretation and
- 7 disposition of radiography results. Only trained personnel shall be allowed to operate
- 8 radiography equipment.
- Standardized training requirements for radiography operators shall be based upon existing
 industry standard training requirements.
- The Permittees shall require each site to develop a training program that provides radiography 11 operators with both formal and on-the-job (OJT) training. Radiography operators shall be 12 instructed in the specific waste generating practices, typical packaging configurations, and 13 associated waste material parameters expected to be found in each Waste Matrix Code at the 14 site. The OJT and apprenticeship shall be conducted by an experienced, gualified radiography 15 operator prior to qualification of the training candidate. The training programs will be site-specific 16 due to differences in equipment, waste configurations, and the level of waste characterization 17 efforts. For example, certain sites use digital radiography equipment, which is more sensitive 18 than real-time radiography equipment. In addition, the particular physical forms and packaging 19 configurations at each site will vary; therefore, radiography operators shall be trained on the 20 types of waste that are generated, stored, and/or characterized at that particular site. 21
- Although the Permittees shall require each site to develop its own training program, all of the radiography <u>QC-guality-control</u> requirements specified in this WAP shall be incorporated into the
- training programs and radiography operations. In this way data quality and comparability will not be affected.
- Radiography training programs will be the subject of the Audit and Surveillance Program (Permit
 Attachment C6).
- One or more training<u>Training</u> containers with items (including prohibited items <u>and internal</u> <u>containers of various sizes</u>) common to the waste streams to be characterized and internal containers of various sizes shall be scanned semiannually by each operator. The audio and video media shall then be reviewed by a supervisor to ensure that operators' interpretations
- remain consistent and accurate. Imaging system characteristics shall be verified on a routine
 basis.
- Independent replicate scans and replicate observations of the video output of the radiography 34 process shall be performed under uniform conditions and procedures. Independent replicate 35 scans shall be performed on one waste container per day or once per testing batch, whichever 36 is less frequent, by a gualified radiography operator that was not involved in the original scan of 37 the waste container. Independent observations of one scan (not the replicate scan) shall also be 38 made once per day or once per testing batch, whichever is less frequent, by a gualified 39 radiography operator that was not involved in the original scan of the waste container. A testing 40 41 batch is a suite of waste containers undergoing radiography using the same testing equipment. A testing batch can be up to 20 waste containers without regard to waste matrix. 42

Oversight functions include periodic audio/video media reviews of accepted waste containers and shall be performed by qualified radiography operators that were not involved in the original scans of the waste containers. The results of this independent verification shall be available to the radiography operators who performed the original scans. The Permittees shall require the site project manager to be responsible for monitoring the quality of the radiography data and calling for corrective action, when necessary.

7 C1-2 Visual Examination

the waste container.

38

The waste container contents may be verified directly by visual examination (VE) of the waste 8 container contents. Visual examination may be performed by physically examining the contents 9 of waste containers to verify the Waste Matrix Code and to verify that the container is properly 10 included in the appropriate waste stream. Visual examination shall be conducted on a waste 11 container to identify and describe all-waste items, packaging materials, and waste material 12 parameters in the waste container. Visual examination activities shall be documented on 13 video/audio media, or by using a second operator to provide additional verification by reviewing 14 the contents of the waste container to ensure correct reporting. When VE is performed using a 15 second operator, each operator performing the VE shall observe for themselves the waste being 16 placed in the waste container or the contents within the examined waste container when waste 17 is not removed. The results of all-VE shall be documented on VE data forms, which are used to 18 document the Waste Matrix Code, ensure that the waste container contains no ignitable, 19 corrosive, or reactive waste by documenting the absence of liquids in excess of TSDF-WAC 20 limits or compressed gases, and to verify that the physical form of the waste is consistent with 21 the waste stream description documented in the AK Summary. 22

Visual examination recorded on video/audio media shall meet the following minimumrequirements:

25 26 27 28	•	The video/audio media shall record the waste packaging event for the container such that all-waste items placed into the container are recorded in sufficient detail and shall contain an inventory of waste items in sufficient detail that another trained VE operator can identify the associated waste material parameters.
29	•	The video/audio media shall capture the waste container identification number-
30 31	•	The personnel loading the waste container shall be identified on the video/audio media or on packaging records traceable to the loading of the waste container.
32 33	•	The date of loading of the waste container will be recorded on the video/audio media or on packaging records traceable to the loading of the waste container .
34 35		xamination performed using two generator <u>/storage</u> site personnel shall meet the g minimum requirements:
36 37	•	At least two generator <u>/storage</u> site personnel who witnessed the packaging of the waste shall approve the data forms or packaging records attesting to the contents of

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

- The data forms or packaging records shall contain an inventory of waste items in sufficient detail that another trained VE operator can identify the associated waste material parameters.
- 4 5

1

2

3

 The waste container identification number shall be recorded on the data forms or packaging records.

6 Visual examination video/audio media of containers which contain classified shapes shall be

7 considered classified information. Visual examination data forms or packaging records will not

8 contain classified information.

9 Waste container packaging records may be used to meet the VE data quality objectives (**DQOs**)

- 10 (Permit Attachment C, Section C-4a(1)). These records must meet the minimum requirements
- listed above for either VE recorded on video/audio media or VE performed by two
- 12 generator/storage site personnel, and shall be reviewed by operators trained and qualified to the
- requirements listed below. The operators will prepare data forms based on the visual
- examination records. Visual examination batch data reports will be prepared, reviewed, and
- approved as described in Permit Attachment C, Section C-4, and Permit Attachment C3.

Standardized training for VE shall be developed. Visual examination operators shall be 16 instructed in the specific waste generating processes, typical packaging configurations, and 17 waste material parameters expected to be found in each Waste Matrix Code at the site. The 18 training shall be site specific to include the various waste configurations generated/stored at the 19 site. For example, the particular physical forms and packaging configurations at each site will 20 vary so operators shall be trained to examine the types of waste that are generated, stored, 21 and/or characterized at that particular site. Training will include the following regardless of 22 Summary Category Group: 23

- Identifying and describing the contents of a waste container by examining all-items in
 waste containers of previously packaged waste
- Identifying when VE cannot be used to meet the DQOs
- 27 Visual examination personnel shall be requalified once every two years.

Each VE facility shall designate a VE expert. The VE expert shall be familiar with the waste generating processes that have taken place at that site and also be familiar with all of the types of waste being characterized at that site. The VE expert shall be responsible for the overall direction and implementation of the VE at that facility. The Permittees shall require site QAPjPs to specify the selection, qualification, and training requirements of the VE expert. ATTACHMENT C2 RESERVED

QUALITY ASSURANCE OBJECTIVES AND DATA VALIDATION TECHNIQUES FOR WASTE CHARACTERIZATION METHODS

ATTACHMENT C3

QUALITY ASSURANCE OBJECTIVES AND DATA VALIDATION TECHNIQUES FOR WASTE CHARACTERIZATION METHODS

TABLE OF CONTENTS

C3-1	Validation Methods	.3
C3-2	Non Destructive Examination Methods C3-2a Radiography C3-2b Visual Examination	.4
C3-3	Acceptable Knowledge	.5
C3-4	Data Review, Validation, and Verification Requirements C3-4a Data Generation Level C3-4a(1) Independent Technical Review C3-4b Project Level C3-4b(1) Site Project Manager Review C3-4b(2) Prepare Site Project Manager Summary and Data Validation Summary	.6 .7 .8 .8
	C3-4b(3) Prepare Waste Stream Characterization Package	.9
	C3-4c Permittee Level	.9
C3-5	Reconciliation with Data Quality Objectives 1 C3-5a Reconciliation at the Project Level 1 C3-5b Reconciliation at the Permittee Level 1	10
C3-6	Data Reporting Requirements. 1 C3-6a Data Generation Level 1 C3-6b Project Level. 1 C3-6b(1) Waste Stream Profile Form 1 C3-6b(2) Characterization Information Summary 1 C3-6b(3) Waste Stream Characterization Package 1 C3-6b(4) WIPP Waste Information System Data Reporting 1	1 2 2 3 4
C3-7	Nonconformances1	4
C3-8	Special Training Requirements and Certifications1	6
C3-9	Changes to WAP-Related Plans or Procedures1	17
C3-10	List of References 1	17

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

LIST OF TABLES

2 Table

Title

- 3 Table C3-1 Waste Material Parameters and Descriptions
- 4 Table C3-2 Minimum Training and Qualifications Requirements
- 5 Table C3-3 Testing Batch Data Report Contents

6

1

1

2

3

ATTACHMENT C3

QUALITY ASSURANCE OBJECTIVES AND DATA VALIDATION TECHNIQUES FOR WASTE CHARACTERIZATION METHODS

4 <u>C3-1 Validation Methods</u>

5 The Permittees shall require the generator/storage sites (sites) to perform <u>data</u> validation of all

data so that data used for Waste Isolation Pilot Plant (WIPP) compliance programs will be of
 known and acceptable quality.

- 8 The qualitative data or descriptive information generated by radiography and visual examination
- ⁹ is not amenable to statistical data quality analysis. However, radiography and visual
- 10 examination are complementary techniques yielding similar data for determining the waste
- 11 matrix code. The waste matrix code is determined to ensure that the container is properly
- included in the appropriate waste stream.
- 13 Data validation will be used to assess the quality of waste characterization data collected based
- 14 upon project precision, accuracy, completeness, comparability, and representativeness
- ¹⁵ objectives. These objectives are described below:
- 16 Precision
- 17 Precision is a measure of the mutual agreement among multiple measurements.
- 18 Accuracy
- Accuracy is the degree of agreement between a measured result and the true or known value.
- 20 Completeness
- Completeness is a measure of the amount of valid data obtained from a method compared to the total amount of data obtained.
- 23 Comparability
- 24 Comparability is the degree to which one data set can be compared to another.
- 25 <u>Representativeness</u>
- Representativeness is the degree to which <u>a</u> sample <u>represents</u>represent a characteristic of a population.
- 28 <u>C3-2 Non Destructive Examination Methods</u>
- 29 Quality Assurance Objectives
- ³⁰ The <u>quality assurance objectives (</u>**QAOs**) for non destructive <u>non-destructive</u> examination
- 31 (NDE) <u>methods</u> are detailed in this section. <u>Non-destructive examination</u>NDE can be either
- radiography or visual examination (**VE**). If the QAOs described below are not met, then

- 1 corrective action shall be taken. It should be noted that NDE is primarily a qualitative
- 2 determination. The objective of NDE for the program is to verify that the physical form of the
- 3 waste matches the waste stream description as determined by <u>acceptable knowledge (</u>**AK**<u>)</u> and
- 4 the absence of prohibited items. The Permittees shall require each site to describe-all activities
- ⁵ required to achieve these objectives in the site quality assurance project plan (**QAPjP**) and
- 6 standard operating procedures (<u>SOPs</u>SOP).

7 C3-2a Radiography

⁸ Data to meet these objectives must be obtained from a video and audio recorded scan provided
 ⁹ by trained radiography operators at the sites. Results must also be recorded on a radiography
 ¹⁰ data form. The precision, accuracy, completeness, and comparability objectives for radiography

11 data are presented below.

12 Precision

Precision is maintained by reconciling any discrepancies between two radiography operators

14 with regard to identification of the waste matrix code, liquids in excess of <u>Treatment, Storage</u>,

and Disposal Facility Waste Acceptance Criteria (TSDF-WAC) limits, and compressed gases
 through independent replicate scans and independent observations. Additionally, the precision

of radiography is verified prior to use by tuning precisely enough to demonstrate compliance

18 with QAOs through viewing an image test pattern.

19 Accuracy

Accuracy is obtained by using a target to tune the image for maximum sharpness and by

requiring operators to successfully identify 100 percent of the items required to meet the <u>data</u>

22 <u>quality objectives (DQOs)</u> for radiography specified in Permit Attachment C, Section C-4a(1) in

a training container during their initial qualification and subsequent requalification.

24 <u>Completeness</u>

A video and audio media recording of the radiography examination and a validated radiography

data form will be obtained for 100 percent of the waste containers subject to radiography. All

video<u>Video</u> and audio media recordings and radiography data forms will be subject to validation

as indicated in Section C3-4.

29 Comparability

The comparability of radiography data from different operators shall be enhanced by using standardized radiography procedures and operator gualifications.

32 C3-2b Visual Examination

Results must be recorded on a VE data form. The precision, accuracy, completeness, and

comparability objectives for VE data are presented below.

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

1 Precision

- 2 Precision is maintained by reconciling any discrepancies between the operator and the
- 3 independent technical reviewer with regard to identification of waste matrix code, liquids in
- 4 excess of TSDF-WAC limits, and compressed gases.

5 Accuracy

- 6 Accuracy is maintained by requiring operators to pass a comprehensive examination and
- 7 demonstrate satisfactory performance in the presence of the VE expert during their initial
- 8 qualification. <u>Visual examination</u>VE operators shall be requalified every two years.

9 <u>Completeness</u>

10 A validated VE data form will be obtained for 100 percent of the waste containers subject to VE.

11 Comparability

The comparability of VE data from different operators shall be enhanced by using standardized
 VE procedures and operator qualifications.

14 C3-3 Acceptable Knowledge

- Acceptable knowledge-documentation provides primarily qualitative information that cannot be assessed according to specific data quality goals that are used for quantitative techniques. To ensure that the <u>AKacceptable knowledge</u> process is consistently applied, the Permittees shall require sites to comply with the following data <u>QAOs</u> quality requirements for acceptable <u>knowledge documentationAK</u>:
- 19 **knowledge documentation<u>AK</u>**:
- Precision The qualitative determinations, such as compiling and assessing
 acceptable knowledge documentation<u>AK</u>, do not lend themselves to statistical
 evaluations of precision. However, the acceptable knowledge information<u>AK</u> will be
 addressed by-the independent reviews review of acceptable knowledge information
 during internal and external audits.
- Accuracy The percentage of waste containers which require reassignment to a new waste matrix code and/or designation of different <u>U.S. Environmental</u>
 <u>Protection Agency (EPA)</u> hazardous waste numbers based on testing data and discrepancies identified by the Permittees during waste confirmation will be reported as a measure of acceptable knowledge<u>AK</u> accuracy.
- Completeness The <u>AK</u>acceptable knowledge record must contain 100 percent of the required information (Permit Attachment <u>C4, Section</u> C4-3). The usability of the <u>AK</u>acceptable knowledge information will be assessed for completeness during audits.
- Comparability Comparability is ensured through sites meeting the training
 requirements and complying with the minimum standards outlined for procedures
 that are used to implement the acceptable knowledge<u>AK</u> process. All sites must
 assign hazardous waste numbers in accordance with Permit Attachment C4-3b

 Representativeness - Representativeness is a qualitative parameter that will be satisfied by ensuring that the process of obtaining, evaluating, and documenting acceptable knowledgeAK information is performed in accordance with the minimum standards established in Permit Attachment C4, Section C4-3. Sites also must assess and document the limitations of the acceptable knowledgeAK information used to assign EPA hazardous waste numbers (e.g., purpose and scope of information, date of publication, type and extent to which waste parameters are addressed). 	1 2	and provide this information regarding its waste to other sites who store or generate a similar waste stream.
 minimum standards established in Permit Attachment C4<u>, Section C4-3</u>. Sites also must assess and document the limitations of the acceptable knowledge<u>AK</u> information used to assign <u>EPA</u> hazardous waste numbers (e.g., purpose and scope of information, date of publication, type and extent to which waste 	3 4 5	satisfied by ensuring that the process of obtaining, evaluating, and documenting
 information used to assign <u>EPA</u> hazardous waste numbers (e.g., purpose and scope of information, date of publication, type and extent to which waste 	6	minimum standards established in Permit Attachment C4. Section C4-3. Sites also
· · · · · · · · · · · · · · · · · · ·	8	information used to assign <u>EPA hazardous waste numbers</u> (e.g., purpose and
	9 10	

information reporting its waste to other sites who store or

11 The Permittees shall require each generator/storage site to comply with the nonconformance 12 notification and reporting requirements of Section C3-7 if the results of testing specified in

Permit Attachment C are inconsistent with acceptable knowledge<u>AK</u>-documentation.

The Permittees shall require each site to address quality control by tracking its performance with regard to the use of acceptable knowledge<u>AK</u> by: 1) assessing the frequency of inconsistencies among information, and 2) documenting acceptable knowledge<u>AK</u> inconsistencies identified through radiography and visual examination. In addition, the acceptable knowledge<u>AK</u> process and waste stream documentation must be evaluated through internal assessments by generator/storage site quality assurance organizations and assessments by auditors external to the organization (i.e., the Permittees).

21 <u>C3-4</u> Data Review, Validation, and Verification Requirements

Procedures shall be developed for the review, validation, and verification of data at the data 22 generation level; the validation and verification of data at the project level; and the verification of 23 data at the Permittee level. Data review determines if raw data have been properly collected 24 and ensures raw data are properly reduced. Data validation verifies that the data reported 25 satisfy the requirements of this Waste Analysis Plan (WAP) and is accompanied by signature 26 release. Data verification authenticates that data as presented represent the testing activities as 27 performed and have been subject to the appropriate levels of data review. The requirements 28 presented in this section ensure that WAP records furnish documentary evidence of quality. 29

The Permittees shall require the sites to generate the following Batch Data Reports <u>(BDRs)</u> for data validation, verification, and quality assurance activities:

- A Testing Batch Data ReportBDR or equivalent includes all data pertaining to radiography or visual examination for up to 20 waste containers without regard to waste matrix. Table C3-3 lists all of the information required in Testing Batch Data ReportsBDRs (identified with an "X") and other information that is necessary for data validation, but is optional in Testing Batch Data ReportsBDRs (identified with an "O").
- 38 <u>C3-4a Data Generation Level</u>

The following are minimum requirements for raw data collection and management which the Permittees shall require for each site:

1 2	•	All raw <u>Raw</u> data shall be signed and dated in reproducible ink by the person generating it. Alternately, unalterable electronic signatures may be used.
3	•	All dataData must be recorded clearly, legibly, and accurately in field records.
4 5 6 7 8	•	All changes <u>Changes</u> to original data must be lined out, initialed, and dated by the individual making the change. A justification for changing the original data may also be included. Original data must not be obliterated or otherwise disfigured so as not to be <u>unreadable</u> Data changes shall only be made by the individual who originally collected the data or an individual authorized to change the data.
9 10	•	All dataData must be transferred and reduced from field records completely and accurately.
11 12	•	All field <u>Field</u> records must be maintained as specified in <u>Permit Attachment C.</u> Table C-2 -of Attachment C .
13 14	•	Data must be organized into a standard format for reporting purposes (Batch Data Report<u>BDR</u>), as outlined in specific testing procedures.
15 16 17 18 19 20	•	All electronic Electronic and video data must be stored appropriately to ensure that waste container and associated <u>quality control (QC)</u> QC data are readily retrievable. In the case of classified information, additional security provisions may apply that could restrict retrievability. The additional security provisions will be documented in generator/storage site procedures as outlined in the QAPjP in accordance with prevailing classified information security standards.
21	Data review	validation and verification at this level involves scrutiny and signature release from

Data review, validation, and verification at this level involves scrutiny and signature release from qualified independent technical reviewer(s) not involved in the generation or recording of the data under review, as specified below. Individuals conducting this data review, validation, and verification must use checklists that address all of the items included in this section. Completed checklists must be forwarded with Batch Data Reports<u>BDRs</u></u> to the project level.

26 <u>C3-4a(1)</u> Independent Technical Review

The independent technical review ensures by review of raw data that data generation and reduction are technically correct; calculations are verified correct; deviations are documented; and <u>guality assurance (QA)/QC</u>QA/QC results are complete, documented correctly, and compared against WAP criteria. This review validates and verifies all of the work documented by the originator.

One hundred percent of the Batch Data ReportsBDRs must receive an independent technical review by a trained and qualified individual who was not involved in the generation or recording of the data under review. This review shall be performed by an individual other than the data generator who is qualified to have performed the initial work. The independent technical review must be performed as soon as practicably possible in order to determine and correct negative quality trends in the testing process. However at a minimum, the independent technical review must be performed before any waste associated with the data reviewed is managed, stored, or

- disposed at <u>the WIPP facility</u>. The reviewer(s) must release the data as evidenced by signature,
 and as a consequence ensure the following:
 - Data generation and reduction were conducted in a technically correct manner in accordance with the methods used (procedure with revision). Data were reported in the proper units and correct number of significant figures.
- Calculations have been verified by a valid calculation program, a spot check of verified calculation programs, and/or 100 percent check of all hand calculations.
 Values that are not verifiable to within rounding or significant difference discrepancies must be rectified prior to completion of independent technical review.
- The data have been reviewed for transcription errors.
- The testing data QA documentation for Batch Data ReportsBDRs is complete and includes, as applicable, raw data, calculation records, calibration records (or references to an available calibration package). Corrective action will be taken to ensure that all Batch Data ReportsBDRs are complete and include all necessary raw data prior to completion of the independent technical review.
- Radiography tapes have been reviewed (independent observation) on a waste container basis at a minimum of once per testing batch or once per day of operation, whichever is less frequent (Attachment C1, Section C1-1). The radiography tape will be reviewed against the data reported on the radiography form to ensure that the data are correct and complete.
- QAOs have been met according to the methods outlined in Sections C3-2 and C3-3.

23 <u>C3-4b Project Level</u>

3

4

5

Data validation and verification at this level involves scrutiny and signature release from the Site
 Project Manager (or designee). The Permittees shall require each site to meet the following
 minimum requirements for each waste container. Any Anoconformance identified during this
 process shall be documented on a nonconformance report (Section C3-7).

28 The Site Project Manager shall ensure that a repeat of the data generation level review,

validation, and verification is performed on the data for a minimum of one randomly chosen

30 waste container quarterly (every three months). This exercise will document that the data

31 generation level review, validation, and verification is being performed according to

32 implementing procedures.

33 C3-4b(1) Site Project Manager Review

34 The Site Project Manager Review is the final validation that all of the data contained in Batch

³⁵ Data Reports<u>BDRs</u> from the data generation level are complete and have been properly

³⁶ reviewed as evidenced by signature release and completed checklists.

- 37 One hundred percent of the Batch Data ReportsBDRs must have Site Project Manager
- signature release. At a minimum, the Site Project Manager signature release must be performed

before any waste associated with the data reviewed is managed, stored, or disposed at <u>the</u>
 WIPP<u>facility</u>. This signature release must ensure the following:

3 4 5 6 7	•	Testing batch QC checks (e.g., replicate scans, measurement system checks) were properly performed. Radiography data are complete and acceptable based on evidence of videotape review of one waste container per day or once per testing batch, whichever is less frequent, as specified in Permit Attachment C1, Section C1-1.
8 9 10	•	Data generation level independent technical review, validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases.
11 12	•	Independent technical reviewers were not involved in the generation or recording of the data under review.
13	•	Batch data review checklists are complete.
14 15	•	Batch Data Reports are complete and data are properly reported (e.g., data are reported in the correct units, and with the correct number of significant figures).
16 17	•	Verify that data are within established data assessment criteria and meet all <u>the</u> applicable QAOs (Sections C3-2 and C3-3).
18	<u>C3-4b(2)</u>	Prepare Site Project Manager Summary and Data Validation Summary

To document the project-level validation and verification described above, the Permittees shall 19 require each Site Project Manager (or designee) to prepare a Site Project Manager Summary 20 and a Data Validation Summary. These reports may be combined to eliminate redundancy. The 21 Site Project Manager Summary includes a validation checklist for each BDRBatch Data Report. 22 Checklists for the Site Project Manager Summary must be sufficiently detailed to validate all 23 aspects of a BDRBatch Data Report that affect data quality. The Data Validation Summary 24 provides verification that, on a per waste container basis as evidenced by Batch Data 25 ReportBDR reviews, all data have been validated in accordance with the site QAPiP. The Data 26 Validation Summary must identify each Batch Data ReportBDR reviewed (including all waste 27 container numbers), describe how the validation was performed and whether or not problems 28 were detected (e.g., nonconformance reports), and include a statement indicating that all the 29 data are acceptable. Summaries must include release signatures. 30

31 C3-4b(3) Prepare Waste Stream Characterization Package

In the event the Permittees request detailed information on a waste stream, the Site Project Manager will provide a Waste Stream Characterization Package. The Site Project Manager must ensure that the Waste Stream Characterization Package (Section C3-6b(3)) will support waste characterization determinations.

36 <u>C3-4c Permittee Level</u>

The final level of data verification occurs at the Permittee level and must, at a minimum, consist of reviewing a sample of the Batch Data ReportsBDRs during audits of generator/storage sites to verify completeness. During such audits, <u>the</u>DOE is responsible for the verification that Batch
 Data ReportsBDRs include the following:

- Project-level signature releases
 - Listing of <u>all the</u> waste containers being presented in the report
 - Listing of <u>all-the</u>testing, batch numbers associated with each waste container being reported in the package
 - Site Project Manager Summary
- B Data Validation Summary

4

5

6

7

31

32

33

For each Waste Stream Profile Form (WSPF) submitted for approval, DOE must verify that each
 submittal (i.e., WSPF and Characterization Information Summary) is complete and notify the
 originating site in writing of the WSPF approval. <u>The</u> DOE will maintain the data as appropriate
 for use in the regulatory compliance programs. For subsequent shipments made after the initial
 WSPF approval, the verification will also include WWIS internal limit checks (<u>Permit</u> Attachment
 C, Section C-5a(1)).

15 <u>C3-5</u> Reconciliation with Data Quality Objectives

Reconciling the results of waste testing with the DQOs provides a way to ensure that data will be of adequate quality to support the regulatory compliance programs. Reconciliation with the DQOs will take place at both the project level and the Permittees' level. At the project level, reconciliation will be performed by the Site Project Manager, while at the Permittees' level, reconciliation will be performed as described below.

21 C3-5a Reconciliation at the Project Level

The Permittees shall require each Site Project Manager to ensure that <u>all-the</u> data generated and used in decision making meet the DQOs provided in <u>Permit Attachment C</u>. Section C-4a(1) of Permit Attachment C. To do so, the Site Project Manager must assess whether data of sufficient type, quality, and quantity have been collected. For each waste stream characterized, the Permittees shall require each Site Project Manager to determine if sufficient data have been collected to determine the following WAP-required waste parameters, as applicable:

- Waste matrix code
- Waste material parameter weights
- If each waste container of waste contains transuranic (TRU)TRU radioactive waste
 - Whether the waste stream exhibits a toxicity characteristic (TC) under <u>20.4.1.200</u> <u>New Mexico Administrative Code (NMAC) (incorporating Title</u> 40 <u>of the Code of</u> <u>Federal Regulations (CFR)</u> Part 261, Subpart C)
- Whether the waste stream contains listed waste found in 20.4.1.200 NMAC (incorporating 40 CFR Part 261, Subpart D)

- Whether the waste stream can be classified as hazardous or nonhazardous
- 1 2

3

4

- Whether the overall completeness, comparability, and representativeness QAOs were met for each of the testing procedures as specified in Sections C3-2 and C3-3 prior to submittal of a WSPF for a waste stream or waste stream lot.
- If the Site Project Manager determines that insufficient data have been collected to make the determinations listed above, additional data collection efforts must be undertaken. The reconciliation of a waste stream shall be performed, as described in Permit Attachment C4, prior to submittal of WSPF and Characterization Information Summary (CIS) to the Permittees for that waste stream. The Permittees shall not manage, store, or dispose a TRU mixed waste stream at the WIPP facility unless the Site Project Manager determines that the WAP-required waste parameters listed above have been met for that waste stream.

12 C3-5b Reconciliation at the Permittee Level

13 The Permittees must also ensure that data of sufficient type, quality, and quantity are collected

to meet WAP DQOs. The Permittees will ensure sufficient data have been collected to

determine if the waste characterization information is adequate to demonstrate the Permittees'

¹⁶ compliance with <u>Permit</u> Attachment C, Section C-4a(1). This is performed during the Permittees'

17 review of the WSPF and <u>CIS</u>Characterization Information Summary and is documented by <u>the</u>

18 DOE's approval of the WSPF.

19 <u>C3-6 Data Reporting Requirements</u>

- 20 Data reporting requirements define the type of information and the method of transmittal for data
- transfer from the data generation level to the project level and from the project level to the
 Permittees.

23 C3-6a Data Generation Level

Data shall be transmitted by hard copy or electronically (provided a hard copy is available on demand) from the data generation level to the project level. Transmitted data shall include all Batch Data Reports<u>BDRs</u> and data review checklists. The <u>Batch Data Reports</u> and checklists used must contain all of the information required by the testing techniques described in Permit Attachments C1 through C6, as well as the signature releases to document the review, validation, and verification as described in Section C3-4. All Batch Data Reports and checklists shall be in approved formats, as provided in site-specific documentation.

- Batch Data Reports shall be forwarded to the Site Project Manager. All Batch Data Reports
- shall be assigned serial numbers, and each page shall be numbered. The <u>identification</u>serial
- number used for Batch Data ReportsBDRs can be the same as the testing batch number.
- ³⁴ QA <u>Quality assurance</u> documentation, including raw data, shall be maintained in either testing
- facility files, or site project files for those facilities located on site in accordance with the
- document storage requirements of site approved site QAPjPs.

1 <u>C3-6b</u> Project Level

- 2 The site project office shall prepare a WSPF for each waste stream certified for shipment to the
- 3 WIPP <u>facility</u> based on information obtained from acceptable knowledge<u>AK</u> and Batch Data
- 4 Reports <u>BDRs</u>, if applicable. In addition, the site project office must ensure that the
- 5 <u>CIS</u>Characterization Information Summary and the Waste Stream Characterization Package
- 6 (when requested by the Permittees) are prepared as appropriate. The Site Project Manager
- 7 must also verify these reports are consistent with information found in batch reports.
- 8 Summarized testing data are included in the <u>CIS</u>Characterization Information Summary. The
- 9 contents of the WSPF, <u>CIS</u>Characterization Information Summary, and Waste Stream
- 10 Characterization Package are discussed in the following sections.
- 11 After approval of a WSPF and the associated <u>CIS</u>Characterization Information Summary by the
- DOE, the generator/storage site are required to maintain a cross reference of container
- 13 identification numbers to each <u>BDR</u>Batch Data Report.
- A Waste Stream Characterization Package shall be transmitted by hard copy or electronically
 from the Site Project Manager to the Permittees when requested.
- 16 <u>C3-6b(1) Waste Stream Profile Form</u>
- The Waste Stream Profile Form<u>WSPF</u> (WSPF, <u>Permit Attachment C</u>, Figure C-1) shall include
 the following information:
- Generator/storage site name
- 20 Generator/storage site EPA ID
- Date of audit report approval by NMED (if obtained)
 - Original generator of waste stream
 - Whether waste is Contact-Handled <u>contact-handled</u> or <u>remote-handled</u> Remote-Handled
- The Waste Stream WIPP Identification Number
- Summary Category Group

22

23

- Waste Matrix Code Group
- Waste Material Parameter Weight Estimates per unit of waste
- Waste stream name
- A description of the waste stream
- Applicable EPA hazardous waste numbers
- Applicable TRUCON codes

A listing of acceptable knowledgeAK documentation used to identify the waste 1 • stream 2 The waste characterization procedures used and the revision number and date of 3 • the procedure 4 Certification signature of Site Project Manager, name, title, and date signed ٠ 5 Characterization Information Summary C3-6b(2) 6 The <u>CISCharacterization Information Summary</u> shall include the following elements, if 7 applicable: 8 Data reconciliation with DQOs 9 • Radiography and VE summary to document that all prohibited items are absent in • 10 the waste and to verify that the physical form of the waste matches the waste 11 stream description as determined by AK (if applicable). 12 A justification for the selection of radiography and/or VE as an appropriate method 13 • for characterizing the waste. 14 A complete listing of all-the container identification numbers used to generate the • 15 WSPF, cross-referenced to each BDR.Batch Data Report 16 Complete AK summary, including stream name and number, point of generation, 17 waste stream volume (current and projected), generation dates, TRUCON codes, 18 Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, 19 other TRU Waste Baseline Inventory Report TWBIR information, waste stream 20 description, areas of operation, generating processes, Resource Conservation and 21 Recovery ActRCRA determinations, radionuclide information, all-the references 22 used to generate the AK summary, and any other information required by Permit 23 Attachment C4, Section C4-2b. 24 Method for determining Waste Material Parameter Weights per unit of waste. 25 List of any AK Sufficiency Determinations requested for the waste stream, if • 26 applicable. 27 Certification through acceptable knowledgeAK or testing that any waste assigned 28 the EPA hazardous waste number of U134 (hydrofluoric acid) no longer exhibits 29 the characteristic of corrosivity. This is verified by ensuring that no liquid is present 30 in U134 waste. 31

1 <u>C3-6b(3)</u> Waste Stream Characterization Package

- 2 The Waste Stream Characterization Package includes the following information:
- Waste Stream Profile Form (WSPF, Section C3-6b(1))
 - Accompanying <u>CIS</u>Characterization Information Summary (Section C3-6b(2))
 - Complete AK summary (Section C3-6b(2))
 - Batch Data Reports supporting the characterization of the waste stream and any others requested by the Permittees
- Raw testing data requested by the Permittees

9 <u>C3-6b(4)</u> WIPP Waste Information System (WWIS) Data Reporting

The <u>WIPP Waste Information System (WWIS</u>) Data Dictionary includes all of the data
 fields, the field format and the limits associated with the data as established by this WAP. These
 data will be subjected to edit and limit checks that are performed automatically by the database,
 as defined in the *Waste Data System User's Manual* (DOE, <u>2019</u>2009).

14 C3-7 Nonconformances

4

5

6

7

15 The Permittees shall require the status of work and the WAP activities at participating

16 generator/storage sites to be monitored and controlled by the Site Project Manager. This

monitoring and control shall include nonconformance identification, documentation, and
 reporting.

¹⁹ The nonconformances and corrective action processes specified in this section describe

20 procedures between the Permittees and the generator/storage sites.

21 Nonconformances

Nonconformances are uncontrolled and unapproved deviations from an approved plan or
 procedure. Nonconforming items and activities are those that do not meet the WAP

requirements, procurement document criteria, or approved work procedures. Nonconforming

items shall be identified by marking, tagging, or segregating, and the affected generator/storage

site(s) notified. Any waste container for which a nonconformance report (**NCR**) has been written

will not be shipped to the WIPP facility unless the condition that led to the NCR for that

container has been dispositioned in accordance with DOE's Quality Assurance Program

²⁹ Description (**QAPD**). Disposition of nonconforming items shall be identified and documented.

30 The QAPjPs shall identify the person(s) responsible for evaluating and dispositioning

- nonconforming items and shall include referenced procedures for handling them. For each
- 32 container selected for confirmation pursuant to Permit Attachment C7, the Permittees will

examine the respective NCR documentation to verify NCRs have been dispositioned for the

34 selected container.

- 1 Management at all levels-shall foster a "no-fault" attitude to encourage the identification of
- nonconforming items and processes. Nonconformances may be detected and identified by
 anyone performing WAP activities, including
- Project staff during field operations, supervision of subcontractors, data validation and verification, and self-assessment
 Testing Facility staff - during the preparation for and performance of laboratory testing; calibration of equipment; QC activities; data review, validation, and verification; and self-assessment
- QA personnel during oversight activities or audits

A NCR shall be prepared for each nonconformance identified. Each NCR shall be initiated by
 the individual(s) identifying the nonconformance. The NCR shall then be processed by
 knowledgeable and appropriate personnel. For this purpose, a NCR including, or referencing as
 appropriate, results of QC tests, audit reports, internal memoranda, or letters shall be prepared.
 The NCR must provide the following information:

- Identification of the individual(s) identifying or originating the nonconformance
- Description of the nonconformance
- Method(s) or suggestions for correcting the nonconformance (corrective action)
- Schedule for completing the corrective action
- An indication of the potential ramifications and overall usability of the data, if applicable
 - Any approval signatures specified in the site nonconformance procedures
- The Permittees shall require the Site Project Manager to oversee the NCR process and be responsible for developing a plan to identify and track all nonconformances and report this information to the Permittees. The Site Project Manager is also responsible for notifying project personnel of the nonconformance and verifying completion of the corrective action for nonconformances.

26 Nonconformance to DQOs

20

For any non-administrative nonconformance related to applicable requirements specified in this 27 WAP which are first identified at the Site Project Manager signature release level (i.e., a failure 28 to meet a DQO), the Permittees shall receive written notification within seven calendar days of 29 identification and shall also receive a NCR within 30 calendar days of identification of the 30 incident. The DOE shall require the generator/storage site to implement a corrective action 31 which remedies the nonconformance prior to management, storage, or disposal of the waste at 32 the WIPP facility. The Permittees shall send NMED a monthly summary of nonconformances 33 identified during the previous month, indicating the number of nonconformances received and 34 the generator/storage sites responsible. If nonconformances are not identified in a given month, 35 a report is not required. 36

1 DOE's Corrective Action Process

<u>The</u>DOE shall initiate a corrective action process when internal nonconformances and
 nonconformances at the generator/storage sites are identified. Activities and processes that do
 not meet requirements are documented as deficiencies.

5 When a deficiency is identified by the Permittees, the following process action steps are 6 required:

The condition is documented on a Corrective Action Report (CAR) by the individual 7 • identifying the problem. 8 The DOE has designated the CAR Initiator and Assessment Team Leader to 9 • review the CAR, determine validity of the finding (determine that a requirement has 10 been violated), classify the significance of the condition, assign a response due 11 date, and issue the CAR to the responsible party. 12 The responsible organization reviews the CAR, evaluates the extent and cause of • 13 the deficiency and provides a response to DOE, indicating remedial actions and 14 actions to preclude recurrence that will be taken. 15 The DOE reviews the response from the responsible organization and, if 16 • acceptable, communicates the acceptance to the responsible organization. 17 The responsible organization completes remedial actions and actions to preclude ٠ 18 recurrence of the condition. 19 After allthe corrective actions have been completed, DOE schedules and performs 20 • a verification to ensure that corrective actions have been completed and are 21 effective. When all the corrective actions have been completed and verified as 22 being effective, the CAR is closed by the CAR Initiator and Assessment Team 23 Leader on behalf of DOE. 24 As part of the planning process for subsequent audits and surveillances, past 25 • deficiencies are reviewed and the previous deficient activity or process is subject to 26 reassessment. 27 C3-8 **Special Training Requirements and Certifications** 28

Before performing activities that affect WAP quality, all personnel are required to receive 29 indoctrination into the applicable scope, purpose, and objectives of the WAP and the specific 30 QAOs of the assigned task. Personnel assigned to perform activities for the WAP shall have the 31 education, experience, and training applicable to the functions associated with the work. 32 Evidence of personnel proficiency and demonstration of competence in the task(s) assigned 33 must be demonstrated and documented. All personnel Personnel designated to work on specific 34 aspects of the WAP shall maintain qualification (i.e., training and certification) throughout the 35 duration of the work as specified in this WAP and applicable QAPjPs/procedures. Job 36 performance shall be evaluated and documented at periodic intervals, as specified in the 37 implementing procedures. 38

- 1 Personnel involved in WAP activities shall receive continuing training to ensure that job
- 2 proficiency is maintained. If not specified by this WAP, the due date for required continuing
- training courses and requalification shall be the end of the month of the anniversary date when
- 4 the training was previously completed. Training includes both education in principles and
- 5 enhancement of skills. Each participating site shall include in its QAPjP a description of the
- 6 procedures for implementing personnel qualification and training. <u>All trainingTraining</u> records
- 7 that specify the scope of the training, the date of completion, and documentation of job
- 8 proficiency shall be maintained as QA Records in the site project file.
- 9 The minimum qualifications for certain specified positions for the WAP are summarized in Table
- 10 C3-2. QAPjPs, or their implementing SOPs, shall specify the site-specific titles and minimum
- 11 training and qualification requirements for personnel performing WAP activities.
- 12 QAPjPs/procedures shall also contain the requirements for maintaining records of the
- 13 qualification, training, and demonstrations of proficiency by these personnel.
- 14 An evaluation of personnel qualifications shall include comparing and evaluating the
- requirements specified in the job/position description and the skills, training, and experience
- included in the current resume of the person. This evaluation also must be performed for
- 17 personnel who change positions because of a transfer or promotion as well as personnel
- assigned to short-term or temporary work assignments that may affect the quality of the WAP.
- 19 QAPjPs/procedures shall identify the responsible person(s) for ensuring that all personnel
- 20 maintain proficiency in the work performed and identify any additional training that may be 21 required.
- 22 <u>C3-9 Changes to WAP-Related Plans or Procedures</u>
- 23 Controlled changes to WAP-related plans or procedures shall be managed through the
- 24 document control process described in the QAPD. The Site Project Manager shall review all the
- non-administrative changes and evaluate whether those changes could impact DQOs specified
- in the Permit. After site certification, any changes to WAP-related plans or procedures that could
- 27 positively or negatively impact DQOs (i.e., those changes that require prior approval of <u>the</u>DOE
- as defined in Attachment C5, Section C5-2) shall be reported to <u>the</u>DOE within five days of
- ²⁹ identification by the project level review. The Permittees shall send <u>the NMED</u> a monthly
- 30 summary briefly describing the changes to <u>data-quality affecting</u> plans and procedures identified
- ³¹ pursuant to this section during the previous month. <u>If changes to data-quality affecting plans and</u>
- 32 procedures are not identified in a given month, a report is not required.

33 <u>C3-10 List of References</u>

- DOE, <u>2019</u>2009. Waste Data System User's Manual. DOE/WIPP 09-3427, Current Revision,
- ³⁵ Carlsbad, New Mexico, Carlsbad Area Office, U.S. Department of Energy.
- ³⁶ Pasternack B. S. and N. H. Harley. 1971. "Detection Limits for Radionuclides in the Analysis of
- 37 Multi-Component Gamma-Spectrometric Data." Nucl. Instr. and Meth, No. 91: pp. 533-40.

TABLES

Table C3-1Waste Material Parameters and Descriptions

Waste Material Parameter	Description
Iron-based Metals/Alloys	Iron and steel alloys in the waste; does not include the waste container materials
Aluminum-based Metals/Alloys	Aluminum or aluminum-based alloys in the waste materials
Other Metals	All other Other metals found in the waste materials
Other Inorganic Materials	Nonmetallic inorganic waste including concrete, glass, firebrick, ceramics, sand, and inorganic sorbents
Cellulosics	Materials generally derived from high-polymer plant carbohydrates; (e.g., paper, cardboard, wood, and cloth)
Rubber	Natural or man-made elastic latex materials; (e.g., surgeons' gloves, and leaded rubber gloves)
Plastics (waste materials)	Generally man-made materials, often derived from petroleum feedstock; (e.g., polyethylene and polyvinylchloride)
Organic Matrix	Cemented organic resins, solidified organic liquids and sludges
Inorganic Matrix	Any homogeneous materials consisting of sludge or aqueous-based liquids that are solidified with cement, calcium silicate, or other solidification agents; (e.g., wastewater treatment sludge, cemented aqueous liquids, and inorganic particulates)
Soils/gravel	Generally consists of naturally occurring soils that have been contaminated with inorganic waste materials
Steel (packaging materials)	55-gal <u>lon</u> (208-L <u>iter</u>) drums
Plastics (packaging materials)	90-millimeter polyethylene drum liner and plastic bags

Table C3-2 Minimum Training and Qualifications Requirements

Personnel	Requirements
Radiography Operators ^a	Site-specific training based on waste matrix codes and waste material parameters; requalification every 2 years

Operators are those persons responsible for the actual operation of testing equipment. QAPjPs shall include the site-specific title for this position. а

3

1

1 2

Table C3-3Testing Batch Data Report Contents

Required Information	Radiography	Visual Examination	Comment
Batch Data Report Date	Х	Х	
Batch number	х	Х	
Waste container number	Х	Х	
Waste stream name and/or number	0	0	
Waste Matrix Code	х	х	Summary Category Group included in waste matrix code
Implementing procedure (specific version used)	Х	X	If procedure cited contains more than one method, the method used must also be cited. Can use revision number, date, or other means to track specific version used.
Container type	0	0	Drums, Standard Waste Box, Ten Drum Overpack, etc.
Video media reference	Х	Х	Reference to Video media applicable to each container. For visual examination of newly generated waste, video media not required if two trained operators review the contents of the waste container to ensure correct reporting.
Imaging check	0		
Camera check		0	
Audio check	0	0	
QC documentation	х	х	
Verification that the physical form matches the waste stream description and Waste Matrix Code.	Х	Х	Summary Category Group included in waste matrix code
Comments	х	Х	
Reference to or copy of associated NCRs, if any	Х	Х	Copies of associated NCRs must be available.
Verify absence of prohibited items	Х	Х	
Operator signature and date of test	Х	Х	Signatures of both operators required for Visual Verification of Acceptable Knowledge <u>AK</u>
Data review checklists	х	Х	All dataData review checklists will be identified

LEGEND:

X - Required in batch data report.

O - Information must be documented and traceable; inclusion in batch data report is optional.

ATTACHMENT C4

TRU MIXED WASTE CHARACTERIZATION USING ACCEPTABLE KNOWLEDGE

ATTACHMENT C4

TRU MIXED WASTE CHARACTERIZATION USING ACCEPTABLE KNOWLEDGE

TABLE OF CONTENTS

C4-1	Introduction	3
C4-2	Acceptable Knowledge Documentation C4-2a Required TRU Mixed Waste Management Program Information C4-2b Required TRU Mixed Waste Stream Information C4-2c Additional Acceptable Knowledge Information	4 5
C4-3	Acceptable Knowledge Training, Procedures and Other Requirements C4-3a Qualifications and Training Requirements C4-3b Acceptable Knowledge Assembly and Compilation C4-3c Criteria for Assembling an Acceptable Knowledge Record and Delineating	8
	the Waste Stream C4-3d AK Sufficiency Determination Request Contents C4-3e Requirements for Re-evaluating Acceptable Knowledge Information C4-3f Acceptable Knowledge Data Quality Requirements C4-3g Audits of Acceptable Knowledge	11 12 13

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

LIST OF FIGURES

Figure 2

Title

- Figure C4-1 Figure C4-2 Compilation of Acceptable Knowledge Documentation 3
- Acceptable Knowledge Auditing 4

5

ATTA	CHME	NT C4

2

3

1

TRU MIXED WASTE CHARACTERIZATION USING ACCEPTABLE KNOWLEDGE

4 C4-1 Introduction

The Resource Conservation and Recovery Act (RCRA) regulations codified in Title 40 of the 5 Code of Federal Regulations (CFR) Parts 260 through 265, 268, and 270, and the New Mexico 6 Hazardous Waste Management Regulations in 20.4.1 New Mexico Administrative Code 7 (NMAC) Subparts 100 through 600, Subpart 800, and Subpart 900, authorize the use of 8 acceptable knowledge (AK) in appropriate circumstances by waste generators, or treatment, 9 storage, or disposal facilities to characterize hazardous waste. Acceptable knowledgeThe AK is 10 described in Waste Analysis: EPA Guidance Manual for Facilities That Generate, Treat, Store 11 and Dispose of Hazardous Waste (EPA, 1994). Acceptable knowledgeThe AK, as an alternative 12 to sampling and analysis, can be used to meet all or part of the waste characterization 13 requirements under the RCRA (EPA, 1994). 14 The Environmental Protection Agency's (EPA's) 1994 Waste Analysis Guidance Manual 15 broadly defines the term "acceptable knowledge" to include process knowledge, whereby 16 detailed information on the wastes is obtained from existing published or documented waste 17 analysis data or studies conducted on hazardous waste generated by processes similar to that 18 which generated the waste; facility records of analysis performed before the effective date of 19 RCRA; and waste analysis data obtained from generators of similar wastes that send their 20 wastes off-site for treatment, storage, or disposal (EPA, 1994). If a generator/storage site 21 determines that AK alone is insufficient to accurately characterize a waste, the site may use 22 radiography and/or visual examination (VE) (specified in Permit Attachment C1) to complete the 23 waste characterization process and satisfy the requirements of the Waste Analysis Plan (WAP) 24 specified in Permit Attachment C. Acceptable knowledge The AK is used in transuranic (TRU) 25 mixed waste characterization activities in five ways: 26 To delineate TRU mixed waste streams 27 •

- To assess whether TRU mixed wastes comply with the applicable requirements of the Treatment, Storage, and Disposal Facility Waste Acceptance Criteria (**TSDF-WAC**)
- To assess whether TRU mixed wastes exhibit a hazardous characteristic (20.4.1.200
 NMAC, incorporating 40 CFR <u>§Part 261</u> Subpart C)
- To assess whether TRU mixed wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR <u>§Part</u> 261<u></u> Subpart D)
- To estimate waste material parameter weights

Radiography and/or VE may be performed to augment the characterization of wastes based on
 acceptable knowledge<u>AK</u> when an AK Sufficiency Determination has not been requested by the
 generator/storage site or, if requested, has not been granted by the U.S. Department of Energy
 (DOE) (see Section C4-3d). TRU-Transuranic mixed waste streams shall undergo applicable

provisions of the acceptable knowledge<u>AK</u> process prior to management, storage, or disposal
 by the Permittees at <u>the WIPP facility</u>.

3 <u>C4-2</u> Acceptable Knowledge Documentation

The Permittees shall obtain from each DOE TRU mixed waste generator/storage site (site) a 4 logical sequence of acceptable knowledge<u>AK</u> information that progresses from general facility 5 information (TRU Mixed Waste Management Program Information) to more detailed waste-6 specific information (TRU Mixed Waste Stream Information). Traceability of acceptable 7 knowledgeAK information for a selected container in the audited Waste Summary Category 8 Group(s) will be examined during DOE's audit of a site (Section C4-3g). The consistent 9 presentation of acceptable knowledgeAK documentation among sites in auditable records¹ will 10 allow DOE to verify the completeness and adequacy of acceptable knowledgeAK for TRU mixed 11 waste characterization during the audit process. The Permittees shall require sites to implement 12 the acceptable knowledgeAK process as specified in this Permit to characterize TRU mixed 13 wastes and obtain sufficient waste characterization data to demonstrate compliance with the 14 Permit. The New Mexico Environment Department (NMED) may independently validate the 15 implementation of and compliance with applicable provisions of the WAP at each 16 generator/storage site by participation in the Audit and Surveillance Program (Permit 17 Attachment C6). The DOE shall provide the NMED with current audit schedules and notify 18 NMED in writing no later than thirty (30) calendar days prior to each audit. The NMED may 19 choose to accompany DOE on any audit of the WAP implementation. 20 The following sections include the information the Permittees will require for each site to 21

characterize TRU mixed waste using acceptable knowledge<u>AK</u>. Because waste generating

processes are site-specific, sites shall, as necessary, augment the required acceptable

<u>knowledgeAK</u> records with additional supporting information (see Section C4-2c, Additional
 Acceptable Knowledge Information). If the required information is not available for a particular

Acceptable Knowledge Information). If the required information is not available for a particula
 waste stream, the waste stream will not be eligible for an AK Sufficiency Determination as

27 specified in Section C4-3d.

28 C4-2a Required TRU Mixed Waste Management Program Information

TRUTransuranic mixed waste management program information shall clearly define waste categorization schemes and terminology, provide a breakdown of the types and quantities of TRU mixed waste that are generated and stored at the site, and describe how waste is tracked and managed at the site, including historical and current operations. Information related to TRU mixed waste certification procedures and the types of documentation (e.g., waste profile forms) used to summarize acceptable knowledgeAK shall also be provided. The following information shall be included as part of the acceptable knowledgeAK written record:

36 37 Map of the site with the areas and facilities involved in TRU mixed waste generation, treatment, and storage identified

¹ "Auditable records" mean those records which allow the Permittees to conduct a systematic assessment, analysis, and evaluation of the Permittees compliance with the WAP and this Permit.

1 2 3	management (e.g., nuclea	n as related to TRU mixed waste generation and r weapons research may involve metallurgy, radiochemistry, tions that result in specific waste streams)
4 5	• •	ns that generate TRU mixed waste at the site (e.g., ons design, or weapons fabrication)
6 7	 Waste identification or cat description codes, content 	egorization schemes used at the facility (e.g., item codes)
8 9	 Types and quantities of The through future projections 	RU mixed waste generated, including historical generation
10 11		ms generated from the same building and process, as combustibles, metals, and glass)
12 13	 Waste certification proced sent to the WIPP facility 	ures for retrievably stored and newly generated wastes to be
14	C4-2b Required TRU Mixed Wa	aste Stream Information
15 16 17 18 19 20	mixed waste stream, the Permittees and data that support the acceptabl type and quantity of supporting doc process generating the waste and s	<u>GeAK</u> to delineate site-specific waste streams. For each TRU is shall require sites to compile <u>all the</u> process information <u>e knowledgeAK</u> used to characterize that waste stream. The umentation will vary by waste stream, depending on the site-specific requirements imposed by the Permittees. At a ation shall include the following written information:
21	 Area(s) and/or building(s) 	from which the waste stream was or is generated
22 23		time period of generation (e.g., 100 standard waste boxes generated from June 1977 through December 1977)
24 25 26	generated during decomm	described for each building (e.g., batch waste stream issioning operations of glove boxes), including processes <u>rofluoric acid]</u> waste generation, if applicable.
27 28 29		how the site has historically managed the waste, including atus of the waste (i.e., TRU mixed versus TRU non-mixed
30 31 32 33 34 35	to a size reduction facility research/development, an process flow diagrams can processes, rather than a fo	g., a diagram illustrating glove boxes from a specific building to a container storage area).: In-in the case of alytical laboratory waste, or other similar processes where mot be created, a description of the waste generating ormal process flow diagram, may be included if this d the justification is placed in the auditable record

 Material inputs or other information that identifies the chemical content of the waste stream and the physical waste form (e.g., glove box materials and chemicals handled during glove box operations; events or processes that may have modified the chemical or physical properties of the waste stream after generation; data obtained through visual examination (VE) of newly generated waste that later undergoes radiography; information demonstrating neutralization of U134 [hydrofluoric acid] and waste compatibility)

1

2

3

4

5

6 7

20

22

23

24

The acceptable knowledgeAK written record shall include a summary that identifies all-the 8 sources of waste characterization information used to delineate the waste stream. The basis 9 and rationale for delineating each waste stream, based on the parameters of interest, shall be 10 11 clearly summarized and traceable to referenced documents. Assumptions made in delineating each waste stream also shall be identified and justified. If discrepancies exist between required 12 information, then sites may consider applying all the EPA hazardous waste numbers indicated 13 by the information to the subject waste stream, but must assess and evaluate the information to 14 determine the appropriate EPA hazardous waste numbers consistent with RCRA requirements. 15 The Permittees shall obtain from each site, at a minimum, procedures that comply with the 16 following acceptable knowledgeAK requirements: 17

- Procedures for identifying and assigning the physical waste form of the waste
- Procedures for delineating waste streams and assigning Waste Matrix Codes
 - Procedures for resolving inconsistencies in acceptable knowledge<u>AK</u> documentation
- Procedures for visual examination <u>VE</u> and/or radiography, if applicable
 - For newly generated waste, procedures describing process controls used to ensure prohibited items (specified in the WAP, Permit Attachment C) are documented and managed
- Procedures to ensure radiography and visual examination<u>VE</u> include a list of
 prohibited items that the operator shall verify are not present in each container (e.g.,
 liquid exceeding TSDF-WAC limits, corrosives, ignitables, reactives, and incompatible
 wastes)
- Procedures to document how changes to Waste Matrix Codes, waste stream
 assignment, and associated Environmental Protection Agency (EPA)EPA hazardous
 waste numbers based on material composition are documented for any waste
- Procedures that ensure the assignment of EPA hazardous waste numbers is
 appropriate, consistent with RCRA requirements, and considers site historical waste
 management
- Procedures for estimating waste material parameter weights

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

1 <u>C4-2c</u> Additional Acceptable Knowledge Information

2 The generator/storage sites shall obtain additional acceptable knowledgeAK information. Sites

3 shall collect information as appropriate to augment required information and provide any other

4 information obtained to further delineate waste streams. Adequacy of this information shall be

5 assessed by DOE during audits (Section C4-3g). Sites will use this information to compile the

6 acceptable knowledge<u>AK</u> written record.

7 All additional Additional specific, relevant acceptable knowledge <u>AK</u> documentation assembled

8 and used in the acceptable knowledge <u>AK</u> process, whether it supports or contradicts any

9 required acceptable knowledge<u>AK</u> documentation, shall be identified and an explanation

provided for its use (e.g., identification of a toxicity characteristic). Additional documentation

may be used to further document the rationale for the hazardous characterization results. The

collection and use of additional information shall be assessed by DOE during site audits to
 ensure that hazardous waste characterization is supported, as necessary, by such information.

ensure that hazardous waste characterization is supported, as necessary, by such information
 Similar to required information, if discrepancies exist between additional information and the

required information, then sites may consider applying all<u>the EPA</u> hazardous waste numbers

indicated by the additional information to the subject waste stream, but must assess and

evaluate the information to determine the appropriate <u>EPA</u> hazardous waste numbers

consistent with RCRA requirements. All The information considered must be documented and

¹⁹ placed in the auditable record, including applicable discrepancy resolution documentation.

Additional acceptable knowledge<u>AK</u> documentation includes, but is not limited to, the following information:

Process design documents (e.g., Title II Design) 22 • Standard operating procedures that may include a list of raw materials or reagents, a 23 description of the process or experiment generating the waste, and a description of 24 wastes generated and how the wastes are managed at the point of generation 25 Preliminary and final safety analysis reports and technical safety requirements 26 Waste packaging records 27 Test plans or research project reports that describe reagents and other raw materials • 28 used in experiments 29 Site databases (e.g., chemical inventory database for Superfund Amendments and 30 • Reauthorization Act Title III requirements) 31 Information from site personnel (e.g., documented interviews) 32 • Standard industry documents (e.g., vendor information) 33 Analytical data relevant to the waste stream, including results from fingerprint • 34 analyses, spot checks, routine verification sampling, or other processes that collect 35 information pertinent to the waste stream-: This-this may also include new information 36

2 compliance with the WAP, radiography screening for prohibited items) Material Safety Data Sheets/Safety Data Sheets, product labels, or other product 3 package information 4 Sampling and analysis data from comparable or surrogate waste streams (e.g., • 5 equivalent nonradioactive materials) 6 Laboratory notebooks that detail the research processes and raw materials used in an 7 • experiment 8 C4-3 Acceptable Knowledge Training, Procedures and Other Requirements 9 The Permittees shall require consistency among sites in using acceptable knowledgeAK 10 information to characterize TRU mixed waste by the use of the following: 1) compiling the 11 required and additional acceptable knowledgeAK documentation in an auditable record, 2) 12

which augments required information (e.g., visual examination VE not performed in

auditing acceptable knowledge<u>AK</u> records, and 3) <u>Waste Stream Profile Form (WSPF)</u> approval
 and waste confirmation. This section specifies qualification and training requirements, describes
 each phase of the process, specifies the procedures that the Permittees shall require all-sites to
 develop to implement the requirements for using acceptable knowledge<u>AK</u>, and specifies data

17 quality requirements for acceptable knowledge<u>AK</u>.

- 18 C4-3a Qualifications and Training Requirements
- Site personnel responsible for compiling acceptable knowledge<u>AK</u>, assessing acceptable
 knowledge<u>AK</u>, and resolving discrepancies associated with acceptable knowledge<u>AK</u> shall be
 qualified and trained in the following areas at a minimum:
- WIPP WAP in Permit Attachment C<u>, *Waste Analysis Plan*</u>, and the TSDF-WAC specified in this permit
- State and Federal RCRA regulations associated with solid and hazardous waste characterization
- Discrepancy resolution and reporting processes
- Site-specific procedures associated with waste characterization using acceptable knowledge<u>AK</u>
- 29 <u>C4-3b</u> Acceptable Knowledge Assembly and Compilation
- The Permittees shall obtain from sites acceptable knowledge<u>AK</u> procedures which require consistent application of the acceptable knowledge<u>AK</u> process and requirements. Site-specific acceptable knowledge<u>AK</u> procedures shall address the following:
- Sites shall prepare and implement a written procedure outlining the specific
 methodology used to assemble acceptable knowledge<u>AK</u> records, including the origin
 of the documentation, how it will be used, and any limitations associated with the

information (e.g., identify the purpose and scope of a study that included limited 1 sampling and analysis data). 2 Sites shall develop and implement a written procedure to compile the required 3 acceptable knowledgeAK record. 4 Sites shall develop and implement a written procedure that ensures unacceptable 5 wastes (e.g., reactive, ignitable, corrosive) are identified and segregated from TRU 6 mixed waste populations sent to the WIPP facility. 7 Sites shall prepare and implement a written procedure to evaluate acceptable 8 knowledgeAK and resolve discrepancies. For example, if different sources of 9 information indicate different hazardous wastes are present, then sites shall include 10 theall sources of information in its records and may choose to either conservatively 11 assign EPA hazardous waste numbers or assign only those numbers deemed 12 appropriate and consistent with RCRA requirements. All information Information used 13 to justify assignment of EPA hazardous waste numbers must be placed in the 14 auditable record. Further, the assignment of EPA hazardous waste numbers shall be 15 tracked in the auditable record to allthe required documentation. 16 Sites shall prepare and implement a written procedure to identify hazardous wastes 17 and assign the appropriate EPA hazardous waste numbers to each waste stream. The 18 following are minimum baseline requirements/standards that site-specific procedures 19 shall include to ensure comparable and consistent characterization of hazardous 20 waste: 21 Compile all of the required information in an auditable record. 22 Review the compiled information and delineate waste streams. Delineation of 23 waste streams must comply with the definition in Permit Attachment C, Section C-24 0a, and justify combining waste historically managed separately as TRU mixed and 25 TRU non-mixed waste streams into a single waste stream. 26 Review the compiled information to determine if the waste stream is compliant with 27 the TSDF-WAC. 28 Review the required information to determine if the waste is listed under 20.4.1.200 29 NMAC (incorporating 40 CFR §Part 261), Subpart D. Assign allthe listed EPA 30 hazardous waste numbers unless the sites choose to justify an alternative 31 assignment and document the justification in the auditable record. 32 Review the required information to determine if the waste exhibits a hazardous 33 characteristic or may contain hazardous constituents included in the toxicity 34 characteristics specified in 20.4.1.200 NMAC (incorporating 40 CFR §Part 261), 35 Subpart C. If a toxicity characteristic contaminant is identified and is not included 36 as a listed waste, sites may evaluate available data and assign the toxicity 37 characteristic EPA hazardous waste number consistent with RCRA requirements. 38 All dataData examined to reach the EPA hazardous waste number determination 39 must be placed in the auditable record and must present a clear justification for the 40 EPA hazardous waste number analyses. 41

1 2	 Review the compiled information to provide an estimate of material parameter weights for each container to be stored or disposed of at <u>the_WIPP_facility</u>.
3	For newly generated wastes, procedures shall be developed and implemented to
4	characterize hazardous waste using acceptable knowledge <u>AK</u> prior to packaging the
5	waste.
-	
6 7	 Sites shall ensure that results of audits of the <u>site's</u>TRU mixed waste characterization programs at the site are available in the records.
8	 Sites shall identify the all-process controls (implemented to ensure that the waste
9	contains no prohibited items and to control hazardous waste content and/or physical
10	form) that may have been applied to retrievably stored waste and/or may presently be
11	applied to newly generated waste. Process controls are applied <u>at the time</u> of waste
12	generation/packaging to control waste content, whereas any activities performed <u>after</u>
13	waste generation/packaging to identify prohibited items, hazardous waste content, or
14	physical form are waste characterization activities, not process controls. The AK
15	record must contain specific process controls and supporting documentation
16	identifying when these process controls are used to control waste content. See Permit
17	Attachment C, Section C-2 for programmatic requirements related to process controls.
18	C4-3c Criteria for Assembling an Acceptable Knowledge Record and Delineating the Waste
19	Stream
20	Figure C4-1 provides an overview of the process for assembling acceptable knowledge
21	documentation into an auditable record. The first step is to assemble all of the required
22	acceptable knowledge <u>AK</u> information and any additional information regarding the materials and
23	processes that generate a specific waste stream. The Permittees shall require the sites to
24	implement procedures which comply with the following criteria to establish acceptable
25	knowledge <u>AK</u> records:
	A second ship to such that is former time should be second in the second in the barrow of the barrow of the bar
26	 Acceptable knowledge information shall be compiled in an auditable record, including
27	a road map for all<u>the</u> applicable information.
28	 The overview of the facility and TRU mixed waste management operations in the
29	
20	
	context of the facility's mission shall be correlated to specific waste stream information.
30	context of the facility's mission shall be correlated to specific waste stream information.
30 31	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste
31	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly
	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste
31	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined.
31 32	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined. A reference list shall be provided that identifies documents, databases, Quality
31 32 33	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined.
31 32 33 34	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined. A reference list shall be provided that identifies documents, databases, Quality Assurance protocols, and other sources of information that support the acceptable knowledge<u>AK</u> information.
31 32 33 34	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined. A reference list shall be provided that identifies documents, databases, Quality Assurance protocols, and other sources of information that support the acceptable knowledge<u>AK</u> information. Container inventories for TRU mixed waste currently in retrievable storage shall be delineated
31 32 33 34 35	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined. A reference list shall be provided that identifies documents, databases, Quality Assurance protocols, and other sources of information that support the acceptable knowledge<u>AK</u> information. Container inventories for TRU mixed waste currently in retrievable storage shall be delineated into waste streams by correlating the container identification to all of the required acceptable
31 32 33 34 35 36	 context of the facility's mission shall be correlated to specific waste stream information. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined. A reference list shall be provided that identifies documents, databases, Quality Assurance protocols, and other sources of information that support the acceptable knowledge<u>AK</u> information. Container inventories for TRU mixed waste currently in retrievable storage shall be delineated

1 <u>C4-3d</u> <u>AK Sufficiency Determination Request Contents</u>

2 Generator/storage sites may submit an AK Sufficiency Determination Request (**Determination**

- **Request**) to meet all or part of the waste characterization requirements. The Determination
 Request shall include, at a minimum:
- A complete AK Summary that addresses the following technical requirements:
- 6 <u>Executive Summary;</u>
- 7 <u>Waste Stream Identification Summary</u>, including a demonstration that the waste
 8 stream has been properly delineated and meets the Permit definition of waste
 9 stream (Permit Attachment C, *Introduction*);
- Mandatory Program Information (including, but not limited to, facility location and description, mission, defense waste assessment, spent nuclear fuel and high-level waste assessment, description of waste generating processes, research/development [as necessary], facility support operations [as applicable], types and quantities of TRU waste generated, correlation of waste streams to buildings/processes, waste identification and categorization, physical form identifiers);
- Mandatory Waste Stream Information (including, but not limited to, Area and 17 Building of Generation, waste stream volume/period of generation (including, for 18 newly generated waste, the rate and quantity of waste to be generated), waste 19 generating activities, types of waste generated, material input related to physical 20 form and identification of percentage of each waste material parameter in the 21 waste stream, chemical content information including hazardous constituents and 22 hazardous waste identification, prohibited item content (including documented 23 evidence that the waste meets the TSDF-WAC presented in Permit Part 2. 24 Sections 2.3.3.1 through 2.3.3.10), waste packaging, presence of filter vents, 25 number of layers of confinement); 26
- 27 <u>Types of additional information gathered;</u>
- 28 <u>Container specific data</u> (if available and relevant); and
- 29 <u>A complete reference list</u> including-all mandatory and additional information.
- An AK roadmap (defined as a cross reference between mandatory programmatic and mandatory waste stream information, with references supporting these requirements).
- A complete reference list including-all mandatory and additional documentation.
- Additional relevant information for the required programmatic and waste stream data
 addressed in the AK Summary, examples of which are presented in Permit Attachment
 C4, Section C4-2c.
- Identification of any mandatory requirements supported only by upper tier documents (i.e., there is insufficient supporting data).

- Description or other means of demonstrating that the AK process described in the Permit was followed (for example, AK personnel were appropriately trained; discrepancies were documented, etc).
- Information showing that the generator/storage site has developed a written procedure for compiling the AK information and assigning <u>EPA</u> hazardous waste numbers as required in <u>Section</u>Permit Attachment C4-3b.
 - Information showing that the generator/storage site has assessed the AK process (e.g. internal audits, <u>SectionPermit Attachment</u> C4-3b).
- 9 The Permittees shall evaluate the Determination Request for completeness and technical 10 adequacy as specified in Permit Attachment C.
- 11 C4-3e Requirements for Re-evaluating Acceptable Knowledge Information

Acceptable knowledge includes information regarding the physical form of the waste, the base
 materials composing the waste, and the process that generates the waste. Waste testing (i.e.,
 radiography or visual examination<u>VE</u>) may be used to augment acceptable knowledge<u>AK</u>
 information.

The Waste Stream Profile Form (WSPF)WSPF and Characterization Information Summary 16 (including the acceptable knowledgeAK summary) will be reviewed by the Permittees for each 17 waste stream prior to DOE approval of the WSPF. The Permittees' review will ensure that the 18 submitted AK information was collected under procedures that ensure implementation of the 19 WAP, provides data sufficient to meet the DQOs in Permit Attachment C.Section C-4a(1), and 20 allow the Permittees to demonstrate compliance with the waste analysis requirements of the 21 Permit. A detailed discussion of the Permittees' waste stream review and the DOE's WSPF 22 approval process is provided in <u>Permit Attachment C. Section</u> C-1d. 23 The Permittees shall require sites to establish procedures for reevaluating acceptable 24 knowledgeAK if the results of waste confirmation indicate that the waste to be shipped does not 25 match the approved waste stream, or if data obtained from radiography or visual examination VE 26 for waste streams without an AK Sufficiency Determination exhibit this discrepancy. Site 27 procedures shall describe how the waste is reassigned, acceptable knowledgeAK reevaluated, 28

and appropriate <u>EPA</u> hazardous waste numbers assigned. If the reevaluation requires that the
 Waste Matrix Code be changed for the waste stream or the waste does not match the approved
 waste stream, the following minimum steps shall be taken to reevaluate acceptable
 <u>knowledgeAK</u>:

33 34

1

2

3

4

5

6

7

- Review existing information based on the container identification number and document all-the_differences in <u>EPA</u> hazardous waste number assignments
- If differences exist in the <u>EPA</u> hazardous waste numbers that were assigned, reassess
 and document all the required acceptable knowledge<u>AK</u> information (Section C4-3b)
 associated with the new designation
- Reassess and document all-testing data associated with the waste

1

2

3

4

- Verify and document that the reassigned Waste Matrix Code was generated within the specified time period, area and buildings, waste generating process, and that the process material inputs are consistent with the waste material parameters identified during radiography or visual examination<u>VE</u>
- Record all-changes to acceptable knowledge<u>AK</u> records

If discrepancies exist in the acceptable knowledge<u>AK</u> information for the revised
 Waste Matrix Code, document the segregation of the affected portion of the waste
 stream, and define the actions necessary to fully characterize the waste

- 9 <u>C4-3f</u> Acceptable Knowledge Data Quality Requirements
- ¹⁰ The data quality objectives for testing techniques are provided in Permit Attachment C3. Testing
- results will be used to augment the characterization of wastes based on acceptable
- 12 knowledge<u>AK</u>. To ensure that the acceptable knowledge<u>AK</u> process is consistently applied, the
- 13 Permittees shall require sites to comply with the data quality requirements for acceptable
- ¹⁴ knowledge<u>AK</u> documentation in Permit Attachment C3.
- Each site shall address quality control by tracking its performance with regard to the use of acceptable knowledgeAK by: 1) assessing the frequency of inconsistencies among information.
- and 2) documenting the results of waste discrepancies identified by the generator/storage site
- during waste characterization or the Permittees during waste confirmation using radiography,
- review of radiography audio/video recordings, visual examination VE, or review of visual
- $\frac{1}{20}$ examination <u>VE</u> records. In addition, the acceptable knowledgeAK process and waste stream
- documentation shall be evaluated through internal assessments by generator/storage site
- 22 quality assurance organizations.
- 23 <u>C4-3g</u> Audits of Acceptable Knowledge
- The DOE will conduct an initial audit of each site prior to certifying the site for shipment of TRU 24 mixed waste to the WIPP facility. This initial audit will establish an approved baseline that will be 25 reassessed annually by the DOE. These audits will verify compliance with the requirements 26 specified in the WAP (Permit Attachment C). The audits will be used to verify compliance with 27 the compilation, application, and interpretation requirements of acceptable knowledgeAK 28 information specified in this Permit at all the sites, and to evaluate the completeness and 29 defensibility of site-specific acceptable knowledgeAK documentation related to hazardous waste 30 characterization. Permit Attachment C6 gives a description of the overall audit program and a 31 required checklist. Figure C4-2 includes the primary steps associated with the audit process of 32 acceptable knowledgeAK. 33
- 34 Site-specific audit plans will be prepared by <u>the DOE</u> and provided to <u>the NMED</u>, and will
- identify the scope of the audit, requirements to be assessed, participating personnel, activities to
- 36 be audited, organizations to be notified, applicable documents, and schedule. Audits will be
- ³⁷ performed in accordance with written procedures and site-specific checklists that will be
- developed by <u>the DOE</u> prior to the audit and provided to <u>the NMED</u>. The site-specific audit
- checklists will include items associated with the compilation and evaluation of the required
- 40 acceptable knowledge<u>AK</u> information as specified in the checklist required by Permit
- 41 Attachment C6.

- Audit checklists shall include <u>Permit Attachment C6.</u> Table C6-2 in <u>Permit Attachment C6</u>, and will include but not be limited to the following elements for review during the audit:
- Documentation of the process used to compile, evaluate, and record acceptable 3 • knowledgeAK is available and implemented; 4 Personnel qualifications and training are documented; 5 All of the The required acceptable knowledgeAK documentation specified in Section 6 C4-2 has been compiled in an auditable record; 7 8 All of the The required procedures specified in <u>Section</u> C4-3 have been developed and implemented, including but not limited to: 9 A procedure exists for assigning EPA hazardous waste numbers to waste streams 10 in accordance with Section C4-3; 11 A procedure exists for resolving discrepancies in acceptable knowledgeAK 12 documentation in accordance with Section C4-3; and 13 Results of other audits of the TRU mixed waste characterization programs at the site 14 are available in site records. 15 Members of the audit team will be knowledgeable regarding the required acceptable 16 knowledgeAK information, RCRA regulations and EPA guidance regarding the use of 17 acceptable knowledgeAK for waste characterization, RCRA hazardous waste characterization, 18 and the WAP requirements (Permit Attachment C). Audit team members will be independent of 19 all TRU mixed waste management operations at the site being audited. 20 21 Auditors will evaluate acceptable knowledgeAK documentation for at least one waste stream from the Summary Category Group(s) being audited, and will audit acceptable knowledgeAK 22 traceability for at least one container from the audited Summary Category Group(s). For these 23 waste streams, auditors will review all-the procedures and associated processes developed by 24 the site for documenting the process of compiling acceptable knowledgeAK documentation; 25 correlating information to specific waste inventories; assigning EPA hazardous waste numbers; 26 and identifying, resolving, and documenting discrepancies in acceptable knowledgeAK records. 27 The adequacy of acceptable knowledgeAK procedures and processes will be assessed and any 28 deficiencies in procedures documented in the audit report. 29 Auditors will review the acceptable knowledgeAK documentation for selected waste streams for 30 logic, completeness, and defensibility. The criteria that will be used by auditors to evaluate the 31
 - logic and defensibility of the acceptable knowledge<u>AK</u> documentation include completeness and
 traceability of the information, consistency of application of information, clarity of presentation,
 - ³⁴ degree of compliance with this Permit Attachment with regard to acceptable knowledge<u>AK</u> data,
 - nonconformance procedures, and oversight procedures. Auditors will evaluate compliance with
 - ³⁶ written site procedures for developing the acceptable knowledge<u>AK</u> record. A completeness
 - review will evaluate the availability of all-required TRU mixed waste management program
 information and TRU mixed waste stream information (Section C4-2). Records will be reviewed
 - for correlation to specific waste streams and the basis for characterizing hazardous waste.
 - 40 Auditors will verify that sites include all-required information and assigned appropriate EPA

- 1 hazardous waste numbers as indicated by the acceptable knowledge<u>AK</u> records and consistent
- 2 with RCRA requirements. All deficiencies Deficiencies in the acceptable knowledge AK
- 3 documentation will be included in the audit report.
- 4 Auditors will verify and document that sites use administrative controls and follow written
- 5 procedures to characterize hazardous waste for newly-generated and retrievably stored wastes.
- 6 Procedures to document changes in acceptable knowledge<u>AK</u> documentation and changes to
- 7 <u>EPA</u>hazardous waste number assignments to specific waste streams also will be evaluated for
- 8 compliance with the WAP (Permit Attachment C).

After the audit is complete, the DOE will provide the site with preliminary results at a close-out 9 meeting. The DOE will prepare a final audit report that includes the all observations and findings 10 identified during the audit. Sites shall respond to all-the audit findings and identify corrective 11 actions. Audit results will be included in the final audit report (Permit Attachment C6). If 12 acceptable knowledgeAK procedures do not exist, the required information is not available, or 13 corrective actions (i.e., CARs) are identified associated with deficiencies in the acceptable 14 knowledgeAK compilation process (i.e., the minimum required information in Section C4-2 has 15 not been collected and organized to present the required information on the subject waste 16 stream(s)), and/or EPA hazardous waste number assignment is not accurate characterization, 17 the Permittees will not manage, store, or dispose TRU mixed waste for the subject waste 18 stream(s)-summary category. Permit Attachment C3, Section C3-7, Nonconformances, requires 19 the responsible organization(s) to review CARs and evaluate the extent of condition. If, during 20 the corrective action process, the extent of condition is determined to be applicable to other 21 waste streams, the Permittees will not manage, store, or dispose of TRU mixed waste from 22 those affected waste streams. Management, storage, or disposal of the affected waste 23 streamssubject waste summary category at the WIPP facility will not resume until the DOE 24 agrees find that all the corrective actions have been implemented and the site complies with 25

²⁶ all<u>the</u> applicable requirements of the WAP.

The DOE disseminates information regarding TRU mixed waste characterization requirements 27 and program status through the WIPP Home Page. The Permittees will use this web page to 28 disseminate information regarding TRU mixed waste streams, RCRA compliance, and 29 operational and programmatic issues, methods development, and waste characterization 30 information, including the application of acceptable knowledgeAK. The DOE is provided the 31 required waste characterization information prior to management, storage, or disposal of that 32 waste at WIPP and also will conduct audits at least annually. The Permittees will maintain an 33 operating record Operating Record for review during regulatory agency audits. The NMED may 34 also review any information relevant to the scope of the audit during site audits. The DOE will 35 notify the NMED regarding any site's failure to implement corrective actions associated with 36 hazardous waste characterization as specified in Permit Parts 1 and 2 and Permit Attachment 37 C3. 38

FIGURES

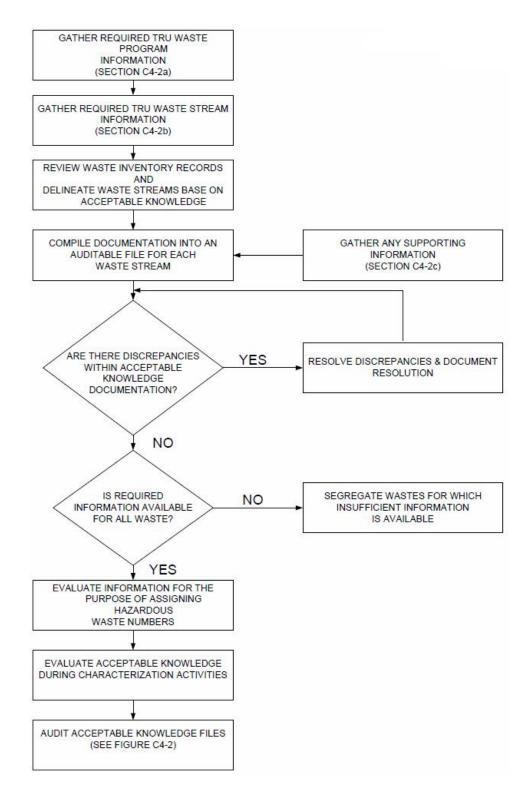


Figure C4-1 Compilation of Acceptable Knowledge Documentation

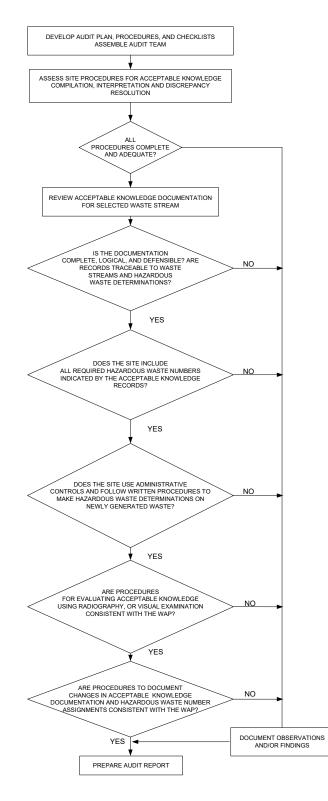


Figure C4-2 Acceptable Knowledge Auditing

QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS

QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS

TABLE OF CONTENTS

C5-1	Quality Assurance Project Plans	2
C5-2	Document Review, Approval, and Control	2

QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS

C5-1 Quality Assurance Project Plans

Prior to management, storage, or disposal of a generator/storage site's <u>transuranic (</u>**TRU**) mixed waste at <u>the Waste Isolation Pilot Plant (WIPP) facility WIPP</u>, the Permittees shall require that each participating site develops and implements a quality assurance project plan (**QAPjP**) that addresses <u>all</u> the applicable requirements specified in <u>Waste Isolation Pilot Plant the</u> waste analysis plan (**WAP**) in Permit Attachment C. The U.S. Department of Energy (**DOE**) will approve QAPjPs from <u>all the</u> generator/storage sites that intend to send TRU mixed waste to the <u>WIPP facility Waste Isolation Pilot Plant</u>. <u>The</u> DOE shall ensure that these QAPjPs include the qualitative or quantitative criteria for determining whether waste characterization program activities are being satisfactorily performed. <u>The</u> DOE shall also ensure that QAPjPs identify the organization(s) and position(s) responsible for their implementation. Additionally, the QAPjPs shall also reference site-specific documentation that details how each of the required elements of the characterization program will be performed.

<u>The</u> DOE shall ensure that prior to the implementation of characterization activities at participating sites, standard operating procedures (**SOPs**) were developed for all<u>the</u> activities which affect the quality of the waste characterization program elements specified in the WAP. For the purposes of the quality assurance (QA) program, the term SOP refers to any site-specific implementing document. Compliance with SOPs will ensure that tasks are performed in a consistent manner that results in achieving the quality required for the <u>QAquality assurance</u> program. The organization, format, content, and designation of SOPs shall be described in the QAPjPs. Site-specific SOPs will be reviewed for consistency with the QAPjP according to the Audit and Surveillance Program specified in Permit Attachment C6.

C5-2 Document Review, Approval, and Control

<u>The</u> DOE shall ensure that the preparation, issuance, and change to documents that specify quality requirements or prescribe activities affecting quality for the transuranic <u>TRU</u> mixed waste characterization program elements specified in the WAP be controlled to assure that correct and current documents are used and referenced. The QAPjPs shall include a document control format consisting of a unique document identification number, current revision number, date, and page number which will be placed on the individual pages of the document. All <u>Qualityquality</u> documents for the waste characterization program shall be reviewed prior to approval and issuance by qualified and independent individuals. The QAPjP review shall consider the technical adequacy, completeness, and correctness of the QAPjP, and the inclusion of and compliance with the requirements established by the WAP (Permit Attachment C). <u>The</u> DOE shall ensure that appropriate QAPjP approval is indicated by a signature and date page included in the front of each document.

At a minimum, <u>the</u>DOE shall ensure that revisions to documents that implement the requirements of the WAP are denoted by including the current revision number on the document title page, the revised signature page, and each page that has been revised. Only revised pages need to be reissued. Changes to documents, other than those defined as editorial changes or minor changes, shall be reviewed and approved by the same functional organizations that

performed the original review and approval, unless other organizations are specifically designated in accordance with approved procedures. Editorial or minor changes may be made without the same level of review and approval as the original or otherwise changed document. The following items are considered editorial or minor changes:

- Correcting grammar or spelling (the meaning has not changed)
- Renumbering sections or attachments
- Updating organizational titles
- Changes to nonquality-affecting schedules
- Revised or reformatted forms, providing the original intent of the form has not been altered
- Attachments marked "Example," "Sample," or exhibits that are clearly intended to be representative only

A change in an organizational title accompanied by a change in the responsibilities is not considered an editorial change. Changes to the text shall be clearly indicated in the document. <u>The DOE</u> shall provide the QAPjP for each site and <u>all subsequent</u> revisions to <u>NMED the New</u> <u>Mexico Environment Department</u> upon approval by <u>the DOE</u>.

<u>The</u> DOE shall ensure that QAPjPs include a detailed description of the reporting and approval requirements for changes to approved QA documents and SOPs, including procedures for implementing changes to these documents. <u>All membersMembers</u> of the site project staff are responsible for reporting any obsolete or superseded information to the <u>site project managerSite</u> <u>Project Manager (SPM)</u>. <u>All site specific Site-specific</u> changes shall be evaluated and approved by the <u>site project managerSPM</u> before implementation. The <u>SPMsite project manager</u> shall notify the appropriate personnel and the affected documents shall be revised as necessary. The site project manager shall also be responsible for notifying the DOE field office of the changes. <u>The</u> DOE shall ensure that changes that affect performance criteria or data quality, testing procedures, quality assurance objectives, calibration requirements, or QC<u>quality control</u> sample acceptance criteria comply with the WAP-(Permit Attachment C) and shall not be made without prior approval of <u>the</u> DOE.

AUDIT AND SURVEILLANCE PROGRAM

AUDIT AND SURVEILLANCE PROGRAM

TABLE OF CONTENTS

C6-1	Introduction	.3
C6-2	Audit Procedures	3
C6-3	Audit Position Functions	4
C6-4	Audit Conduct	5

LIST OF TABLES

2 Table

Title

- 3 Table C6-1 Waste Analysis Plan (WAP) General Checklist for use at DOE's
- 4 <u>Generator/Storage Sites</u>
- 5 Table C6-2 Acceptable Knowledge (AK) Checklist
- 6 Table C6-3 Radiography Checklist
- 7 Table C6-4 Visual Examination (VE) Checklist

8

1 2

AUDIT AND SURVEILLANCE PROGRAM

3 <u>C6-1 Introduction</u>

The Waste Isolation Pilot Plant (WIPP) Audit and Surveillance Program shall ensure that: 1) the 4 operators of each generator/storage site (site) that plan to transport transuranic (TRU) mixed 5 waste to the WIPP facility conduct testing of wastes in accordance with the current WIPP Waste 6 Analysis Plan (WAP) (Permit Attachment C), and 2) the information supplied by each site to 7 satisfy the waste screening and acceptability requirements of Permit Attachment C, Section C-4 8 of the WAP is being managed properly. The U.S. Department of Energy (DOE) will conduct 9 these audits and surveillances at each site performing these activities in accordance with a 10 standard operating procedure (SOP). The New Mexico Environment Department (NMED) 11 personnel may observe these audits and surveillances to validate the implementation of WAP 12 requirements (Permit Attachment C) at each site. Only personnel with appropriate DOEU.S. 13 Department of Energy clearances will have access to classified information during audits. 14 Classified information will not be included in audit reports and records. The audit SOP will 15 contain steps for selecting audit personnel, reviewing applicable background information, 16 preparing an audit plan, preparing audit checklists, conducting the audit, developing an audit 17 report, and following up audit deficiencies. A deficiency is any failure to comply with an 18 applicable provision of the WAP. The checklists for each site shall include, at a minimum, the 19 appropriate checklists found in Tables C6-1 through C6-4 for the summary category groups 20 undergoing audit. 21

22 C6-2 Audit Procedures

Audit procedures shall establish the responsibilities and methodology for planning, scheduling,

24 performing, reporting, verifying, and closing announced and unannounced audits of sites.

Records of all-audit activities shall be part of the WIPP Operating Record and maintained at the

26 WIPP facility until closure. <u>The</u>NMED shall be provided unlimited access to these records.

Approved procedures<u>SOPs</u> shall be used to describe audit activities and requirements. <u>These</u> <u>SOPsProcedures</u> define the responsibilities of specific positions necessary to manage this audit program. The DOE manager who oversees the audit program shall ensure that the following tasks are performed:

• Schedule audits

- Designate lead auditor(s)
- Appoint auditor and lead auditor trainees
- Maintain auditor training and qualification records
- Assure that all-auditors have been given appropriate training, including training on the
 WAP
- Assign auditors and lead auditors to perform annual certification audits

Assure records are entered into the WIPP Operating Record and are properly 3 • maintained until facility closure 4 C6-3 Audit Position Functions 5 The DOE will approve lead auditors, auditors, and technical specialists based upon the 6 expertise required for the functions being examined according to the audit scope. The DOE will 7 supply auditors/technical specialists with expertise in the Resource Conservation and Recovery 8 Act (RCRA) requirements and knowledge of the testing and documentation methods required to 9 verify the hazardous waste characterization performed by the sites. The DOE shall identify all 10 audit team members to the NMED prior to the audit, and shall provide upon request the 11 gualifications of all-audit team members. 12 The lead auditor assigned to be the audit team leader must perform the following tasks: 13 Concur that assigned auditors and technical specialists have the collective experience 14 • and training commensurate with the scope, complexity, or special nature of the 15 activities to be audited 16 Develop an audit plan and coordinate the preparation of an overall checklist to cover • 17 the scope of the audit, with consideration given to all-nonconformances reported as 18 specified in Permit Attachment C3 and to previous audit results from that site 19 Assign specific audit areas to individual auditors and technical specialists within their • 20 21 particular specialty and provide guidance on checklist development Review individual auditor checklists to assure complete coverage of assigned scope, 22 and approve the checklists 23 Conduct the audit at the site • 24 Encourage observers to participate according to the protocol established by the DOE 25 • Communicate audit results at the conclusion of the audit, including any deficiencies 26 • and observations 27 Prepare and sign the audit report 28 Maintain complete records of each audit and transfer them to the DOE manager when 29 • the audit report is issued 30 Auditors and technical specialists assigned to the specific audit will report to the audit team 31

Oversee tracking and closure of all deficiencies and any observations requiring action

leader for supervision and may perform the following tasks:

Review and approve final audit reports

1

1 2	•	Attend any required specific training and team orientation and planning meetings as directed by the audit team leader
3 4	•	Prepare specific audit checklists to verify that the WAP Quality Assurance Objectives (QAOQAOS) are met for the areas being audited
5	•	Obtain audit team leader approval of checklist
6 7	•	Review acceptable knowledge (<u>AK)</u> documentation packages, test report data, and documentation of data verification activities
8 9 10	•	Obtain and evaluate objective evidence by means of observation, document reviews, or the conduct of interviews with operators, technicians, and others necessary to determine the adequacy and effective implementation of the WAP
11 12	•	Conduct inspection tours of waste generating station s , waste testing facilities, calibration facilities, administrative, and document control/record facility
13 14 15 16	•	Complete checklist during the audit indicating the objective evidence observed verifies that the site has met the QAOs for the program elements, methods, and the activities being audited. Add add other items to the checklist as they are observed or as needed during the audit
17 18 19 20	•	Prepare narrative statements <u>that clearly and concisely identify the conditions involved</u> <u>regarding</u> for all-deficiencies, and observations that clearly and concisely identify the conditions involved
20 21	•	Prepare any portion of the final audit report assigned by the lead auditor-
22 23		ill be conducted at least annually for each site involved in the waste characterization. Both announced and unannounced audits will address the following:
24 25 26 27	• • •	Results of previous audits Changes in programs or operations New programs or activities being implemented Changes in key personnel

Annual certification<u>Certification</u> audits shall address contact-handled (**CH**) and remote-handled (**RH**) waste characterization activities if the site has approval or is seeking approval for such wastes. At a minimum, the audit shall evaluate acceptable knowledgeAK documentation for CH

and RH waste separately by Summary Category Group, as applicable.

32 <u>C6-4 Audit Conduct</u>

The conduct of the audit shall commence with an entrance meeting, conducted by the audit team leader, with site management. At this meeting, the audit objectives and scope, the specific areas to be audited, the processes or functions to be observed, and the site participation required, including site interfaces, will be identified. The purpose of this meeting is to confirm the audit scope, discuss the audit sequence, establish channels of communication, and confirm the 1 daily and exit meeting. Audits shall be performed using approved audit checklists that include

2 the checklists in Tables C6-1 to C6-4 for the summary category groups undergoing audit.

3 Consistency of evaluation shall be ensured before the audit through site QAPjP approval (see

- 4 Permit Attachment C5). <u>The QAPjPs</u> for each site shall incorporate the same requirements from
- 5 the WAP. Objective evidence shall be examined (to the depth necessary) to determine if the
- 6 identified activities, procedures, or QAOs are adequate and are being effectively implemented.

7 Audits may not include all waste summary category groups, and thus some audit checklists or portions of checklists (Tables C6-1 through C6-4) may not be applicable to some sites (e.g., 8 approved acceptable knowledgeAK sufficiency determination request for one or more waste 9 streams at a site). In these instances, DOE shall indicate non-applicabilitynonapplicability in the 10 appropriate checklist row, and justify the exclusion under the "Comment" column. In addition, in 11 cases where discrepancies exist between the audit checklists in Tables C6-1 through C6-4 and 12 the Permit, Permit requirements take precedence. The DOE may add to the checklists as 13 necessary to clarify Permit requirements, but any additions will be clearly designated on the 14 checklists (i.e., redline the additions). 15

Audits shall include site personnel interviews, document and record reviews, observations of

operations, and any other activities deemed necessary by the auditors to meet the objectives of

the audit. Observations or deficiencies identified during the audit will be investigated or

evaluated, as necessary, to determine if they are isolated conditions or represent a general

breakdown of the waste characterization quality assurance program. During audit interviews or audit meetings, site personnel may be advised of deficiencies identified within their areas of

responsibility to establish a clear understanding of the identified condition.

The site personnel will be given the opportunity to correct any deficiency that can be corrected 23 during the audit period. Deficiencies and observations will be documented and included as part 24 of the final audit report. Those items that have been resolved during the audit (isolated 25 deficiencies that do not require a root cause determination or actions to preclude recurrence). 26 will be verified prior to the end of the audit, and the resolution will be described in the audit 27 report. Those items that affect the quality of the program, and/or the data generated by that 28 program, which are required by the WAP will be documented on a Corrective Action Report 29 (CAR) and included as a part of the final audit report. The CAR will be entered into the DOE's 30 CAR tracking system and tracked until closure. Resource Conservation and Recovery Act 31 RCRA-related items will be uniquely identified within the CAR tracking system so that they can 32 be tracked separately. Resource Conservation and Recovery Act RCRA-related CARs identified 33 by the site during self-audits will be evaluated during the DOE's audit and surveillance program 34

and tracked in <u>the DOE's <u>CAR</u> tracking <u>system</u> systems</u>.

When a deficiency is identified by the audit team, the audit team member who identified the 36 deficiency prepares the CAR. The DOE reviews the CAR, determine validity (assures that a 37 requirement has in fact been violated), classify the significance of the deficiency, assign a 38 response due date, and issue the CAR to the site. The site reviews the CAR, evaluates the 39 extent and cause of the deficiency, and provides a response to the DOE indicating the remedial 40 actions and actions taken to preclude recurrence. The DOE reviews the response from the site 41 and, if acceptable, communicate the acceptance to the site. The site completes remedial actions 42 and actions to preclude recurrence. After all-corrective actions have been completed, DOE may 43 schedule and perform a verification visit to assure that corrective actions have been completed 44 and are effective. NMED personnel may participate as observers in these verification visits. 45 When all actions have been completed and verified as being effective, the CAR is closed by the 46

1 DOE manager responsible for quality assurance. As part of the planning process for subsequent

- 2 audits and surveillances, past deficiencies will be reviewed and the previous deficient activity or
- ³ process is subject to reassessment.
- <u>The NMED may submit a written Observer Inquiry to the DOE if necessary to seek resolution to</u> a question raised or issue posed during the audit. <u>The DOE shall be responsible for obtaining a</u> response to the Observer Inquiry and submitting a written response to <u>the NMED within 30 days</u> of inquiry submission. <u>The NMED will examine the response and consider this information as</u> part of the audit review and approval process.

9 The sites shall submit corrective action plans to eliminate the deficiency stated on the CAR,

including a resolution of the acceptability of any data generated prior to the resolution of the

11 corrective action.

12 The corrective action response will include a discussion of the investigation performed to

- determine the extent and impact of the deficiency, a description of the remedial actions taken, determination of root cause, and actions to preclude recurrence.
- 15 An exit meeting will be conducted by the lead auditor prior to departure of the audit team from

the site. This meeting will include site management personnel, and may include DOE field office

17 personnel. <u>All draft <u>Draft</u> audit results will be presented to the site management.</u>

The audit report will be prepared, approved, and issued to the site within 30 days of the 18 completion of the audit by the DOE. The NMED shall receive a copy of the audit report upon 19 issuance for information purposes. A formal final audit report will be provided to the NMED 20 which will include WAP-related CAR resolution results and audit results that will include, as a 21 minimum, sections describing the scope, purpose, summary of deficiencies, and observations in 22 narrative format, completed audit checklists, audited procedures, and other applicable 23 documents which provide evidence of WAP implementation. The report will also include an 24 identification of the organization audited, the dates of the audit, and the requested response 25 date. NMED will make the final audit report available for public review and comment. One copy 26 of the formal final audit report shall be submitted to the NMED in hard copy, but any additional 27 copies may be submitted in electronic format. The audited site will respond to any deficiencies 28 and observations within (30 days after receipt of any CARs and indicate the corrective action 29 taken or to be taken. If the corrective action has not been completed, the response must 30 indicate the expected date the action will be completed. The CARs applicable to WAP 31 requirements shall be resolved prior to waste shipment. Subsequent audits or specific 32 verifications, announced or unannounced, will determine if the corrective action has been 33 satisfactorily implemented. Deficiencies (items corrected during the audit [CDAs] and CARs) 34 and observations will be tracked to completion according to established procedure(s). In 35 addition, deficiencies will be trended to determine if similar situations exist system wide. Trend 36 reports will be issued as necessary to provide a "lessons learned" announcement to other sites 37 who might benefit from program improvements implemented as a result of resolutions to the 38 39 specific situations discovered at the performance of these audits.

40 The final audit report provided to the NMED and audit records will be maintained at the WIPP

41 <u>facility</u> as a part of the Operating Record. These records will be included on the Record

Inventory and Disposition Schedule and maintained on-site until closure of the WIPP facility.

⁴³ <u>The NMED shall be provided unlimited access to these records.</u>

TABLES

Table C6-1 Waste Analysis Plan (WAP) General Checklist for use at DOE'S Generator/Storage Sites

		Procedure	Implementa		nple of ion/ Objective is applicable	Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	Wast	e Stream Ide	entification			
1	Does the generator/storage site define "waste stream" as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity? (Attachment C-Section C-0a)					
2	Are procedures in place to ensure that the generator/storage site assigns one of the Summary Category Groups (S3000-homogeneous solids, S4000- soils/gravel, S5000-debris waste) to each waste stream? (Section C-1b)					
3	Are procedures in place to ensure that the generator/storage site assigns Waste Matrix Code Subgroups Groups (e.g., solidified inorganics, solidified organics, salt waste, soils, combustible waste, filters, graphite, heterogeneous debris waste, inorganic nonmetal waste, lead/cadmium metal, uncategorized metal) to each waste stream? (Section C-0a)					
4	Are procedures in place to ensure that the generator/storage site assigns a Waste Stream WIPP Identifier (ID) to each waste stream? (Section C3-6b(1))					

			Documented	Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
4a	Are procedures in place for generator/storage sites to submit an AK Sufficiency Determination (Determination Request) to the Permittees to meet all or part of the waste characterization requirements including:					
	 <u>All informationInformation</u> specified in Permit Attachment C4, Section C4-3d 					
	 Identification of relevant hazardous constituents, and correctly identifies all toxicity characteristic and listed hazardous waste numbers 					
	 <u>Hazardous</u> All hazardous waste number assignments must be substantiated by supporting data and, if not, whether this lack of substantiation compromises the interpretation 					
	Resolution of data discrepancies between different AK sources must be technically correct and documented					
	 The AK Summary includes all the identification of waste material parameter weights by percentage of the material in the waste stream, and determinations are technically correct 					
	 <u>All prohibited Prohibited</u> items specified in the TSDF-WAC should be addressed, and conclusions drawn are technically adequate and substantiated by supporting information 					
	 If the AK record includes process control information specified in Permit Attachment C4, Section C4-3b, the information should include procedures, waste manifests, or other documentation demonstrating that the controls were adequate and sufficient. 					
	• The site must provide the supporting information necessary to substantiate technical conclusions within the Determination Request, and this information must be correctly interpreted.					
	(Section C-0b, Section C4-3d)					
4b	If a generator/storage site does not submit a Determination Request or if the Determination Request is not approved, are procedures in place for the generator/storage site to perform radiography or VE on <u>100 percent_400%</u> of the containers in a waste stream as specified in Permit Attachment C1? (Section C-0b)					

|

		Procedure Documented		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)		
4c	Are procedures in place to ensure that the generator/storage sites complete a Waste Stream Profile Form (WSPF) and Characterization Information Summary (CIS) as specified in Permit Attachment C3, Sections C3-6b(1) and C3-6b(2)? (Section C-0c)							
6	Are procedures in place to ensure that the generator/storage site assigns EPA hazardous waste numbers associated with the waste? If so, do these assigned EPA hazardous waste numbers correspond to the permitted EPA hazardous waste numbers in Table C-5? Are there any assigned EPA hazardous waste numbers that are not permitted EPA hazardous waste numbers on the Table C-5? If so, did the generator/storage site reject the waste for shipment to and disposal at the WIPP facility? Did the generator assign a state hazardous waste codes or numbers? If so, is it assigned to waste that is permitted at the WIPP facility? (Section C-1b)							
7	Are procedures in place to ensure that Summary Category Groups are defined as follows: S3000- Homogeneous solids are solid material, inorganic process residues, inorganic sludges, salt waste, and pyrochemical salt waste excluding soils, that do not meet NMED criteria for classification as debris and are at least 50 percent by volume homogeneous solids or comprise the majority of the waste stream S4000- Waste streams that are at least 50 percent by volume soil/gravel, or comprise the majority of the waste stream							
	S5000- Waste streams that are at least 50 percent volume materials that meet the NMED criteria for debris, or comprise the majority matrix of materials. The criteria for debris are solid materials intended for disposal that exceed 2.36 inch particle size and is a manufactured object, plant or animal matter, or natural geologic material. Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is not a particle of S3000 or S4000 material. (Section C-0a)							

		Procedure	Procedure Documented		nple of ion/ Objective as applicable	Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
8	Does the generator/storage facility have procedures in place to ensure that the following waste characterization parameters will be <u>obtained</u> :					
	Determination whether TRU mixed waste streams comply with the applicable provisions of the TSDF-WAC					
	Determination whether TRU mixed wastes exhibit a hazardous characteristic per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart C)					
	Determination whether TRU mixed wastes are listed per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart D)					
	• Estimation of waste material parameter weights (Section C-2)					
9	Are procedures in place to ensure that waste streams identified to contain incompatible materials or materials incompatible with waste containers cannot be shipped unless treated to remove the incompatibility? (Section C-1c)					
10	Are procedures in place to ensure that the generator/storage site uses acceptable knowledge <u>AK</u> and, as necessary, radiography and visual examination<u>VE</u> analysis as specified in Table C-1?					
	(Section C-3)					

		Procedure	Example of Implementation/ Objective e Documented Evidence, as applicable		Comment (e.g., any change in	
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	U	nacceptable	Waste			
12	 Are procedures in place to ensure that the generator/storage site ensures, through administrative and operational procedures and characterization techniques, that waste containers do not include the following unacceptable waste: liquid waste is not acceptable <u>for disposal</u> at <u>the WIPP facility</u>. Liquid in the quantities delineated below is acceptable Observable liquid shall be no more than <u>4one</u> percent by volume of the outermost container at the time of radiography or<u>_visual examinationVE</u> Internal containers with more than 60 milliliters or <u>3three</u> 					
	 percent by volume observable liquid, whichever is greater, are prohibited Containers with Hazardous Waste Number U134 assigned shall have no observable liquid 					
	 Overpacking the outermost container that was examined during radiography or visual examination <u>VE</u> or redistributing untreated liquid within the container shall not be used to meet the liquid volume limits 					
	non-radionuclide pyrophoric materials					
	 hazardous wastes not occurring as co-contaminants with TRU wastes (non-mixed hazardous wastes) 					
	 wastes incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other wastes 					
	 wastes containing explosives or compressed gases (continued below) 					

		Procedure	Documented	Implementat	pple of ion/ Objective is applicable	Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
12a	 wastes with polychlorinated biphenyls (PCBs) not authorized under an EPA PCB waste disposal authorization 					
	 wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA Hazardous Waste Numbers of D001, D002, or D003) 					
	 waste that has ever been managed as high-level waste and waste from tanks specified in <u>Permit Attachment C</u>, Table C-4, unless specifically approved through a Class 3 permit modification 					
	 any waste container from a waste stream (or waste stream lot) which has not undergone either radiographic or visual examination <u>VE</u> of a statistically representative subpopulation of the wastes stream in each shipment pursuant to Permit Attachment C7 					
	 any waste container from a waste stream which has not been preceded by an appropriate, certified Waste Stream Profile Form (see Section C-1d) 					
	(Section C-1c)					
	Was	ste Acceptan	ce Control			
14	Are procedures in place to ensure that the generator/storage site uses a Waste Stream Profile Form (WSPF) which includes, at a minimum, the information indicated on the attached WSPF found in <u>Permit Attachment C</u> . Figure C-1 and a Characterization Information Summary (CIS) prior to waste disposal at the WIPP? (Section C-1d)					
16	Are procedures in place to ensure that additional WSPFs are provided to WIPP and NMED for waste streams or portions of waste streams that are reclassified based upon waste characterization information? (Section C-1d)					
16a	Are criteria in place to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required? (Section C-1d)					
	General C	haracterizatio	on Requirements			
25	Are procedures in place to ensure that Acceptable KnowledgeAK is used in waste characterization activities to delineate TRU mixed waste streams, to assess whether TRU mixed wastes comply with the TSDF-WAC, to assess whether TRU mixed waste exhibits a hazardous characteristic (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart C), and to assess whether TRU wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart D), and to estimate waste material parameter weights? (Section C-3a)					

		Procedure	Procedure Documented		nple of ion/ Objective is applicable	Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
26	 Are procedures in place to ensure that radiography and/or visual examination <u>VE</u> are used as necessary to: Examine a waste container to determine the physical form Identify observable liquid in excess of TSDF-WAC limits and containerized gases Verify the physical form matches the waste stream description (Section C-3b) Are procedures in place to ensure that the following characterization activities shall occur: Acceptable Knowledge for all-wastes, with testing as necessary to augment AK including; 					
	 Visual examination or radiography for all-waste containers (Section C4-3e) 					
	Data Generation, Verification, V	Validation, Do	ocumentation, and	d Quality Assur	ance	
30	 Are procedures in place to ensure that the following Data Quality Objectives are met: Use Acceptable KnowledgeAK to delineate TRU mixed waste streams, assess whether TRU mixed wastes comply with the applicable requirements of the TSDF-WAC, assess whether TRU mixed wastes exhibit a hazardous characteristic, assess whether TRU mixed wastes are listed and to estimate waste material parameter weights Use radiography or visual examinationVE to verify the physical form of the waste matches its waste stream description as determined by AK and to verify the absence of prohibited items (Section C-4a(1)) 					

		Procedure	Documented	Example of Implementation/ Objective Evidence, as applicable		Implementation/ Objective		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)		
31	Are procedures in place to ensure that the following Quality Assurance Objectives are adequately defined and assessed for each characterization method:							
	 Precision as a measure of the mutual agreement among multiple measurements. 							
	 Accuracy as the degree of agreement between a measurement result and a true or known value. 							
	 Completeness is a measure of the amount of valid data obtained from a method compared to the total amount of data obtained that is expressed as a percentage. 							
	 Comparability is the degree to which one data set can be compared to another data set. 							
	 Representativeness as an expression of the degree to which data represent characteristics of a population. 							
	(Section C-4a(2))							
32	With respect to data generation, are procedures in place to ensure that the generator/storage site's waste characterization program meets the following general requirements:							
	 Testing data packages and batch data reportsBDRs must be reported accurately in a pre-approved format, must be maintained in permanent files, and must be traceable? 							
	 <u>All data Data</u> must receive a technical review by another qualified operator? 							
	(Section C3-4a)							
33	Are procedures in place to ensure that the generator/storage site performs validation of waste characterization data for each waste container? (Section C-4)							
34	Are procedures in place to ensure that the generator/storage site has a pre- approved format for reporting waste characterization data? (Section C- 4a(3))							
35	Are procedures in place to ensure that the generator/storage site prepares testing batch data reports <u>BDRs</u> to meet the requirements of their own site-specific QAPjP and/or SOPs? (Section C-4a(3))							

			e Documented	Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
36	Are procedures in place to ensure that-all raw data is collected and managed at the data generation level in accordance with the following criteria:					
	 <u>Raw All raw-</u>data shall be signed and dated in reproducible ink by the individual collecting the data, or signed and dated using electronic signatures 					
	 <u>Data All data</u>-shall be recorded clearly, legibly, and accurately in field records 					
	 <u>All changesChanges</u> to original data shall be lined out, initialed, and dated by the individual making the change. Original data may not be obliterated or otherwise be made unreadable 					
	 <u>All dataData</u> shall be transferred and reduced from field records completely and accurately 					
	 All field<u>Field</u> records shall be maintained as specified in Table C2 of Attachment C 					
	 Data shall be organized into standard reporting formats for reporting purposes. 					
	 <u>All electronic</u> and video data must be stored to ensure that waste container and QC data are readily retrievable 					
	(Section C3-4a)					

			Documented	Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
37	Are procedures in place to ensure that <u>100 percent100 %</u> of batch data reports <u>BDRs</u> are subject to independent technical review by an individual qualified to review the data who was not involved in the generation or recording of the data under review. The reviewer shall release the data through signature with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP <u>facility</u> . The review shall ensure the following, as applicable:					
	 Data generation and reduction were conducted according to the methods used and reported in the proper units and significant figures 					
	 Calculations have been verified by a valid calculation program, a spot check of verified calculation programs, and/or a 100 percent check of-all hand calculations 					
	The data have been reviewed for transcription errors					
	 The testing QA documentation for BDRs is complete and includes, as applicable, raw data, calculation records, calibration records 					
	 Radiography tapes are reviewed on a waste container basis at a minimum of once per testing batch or once per day of operation, whichever is less frequent. The radiography tape will be reviewed against the data on the radiography form to ensure that data are complete and correct 					
	QAOs have been met					
	(Section C3-4a(1))					

I

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
40	Are procedures in place to ensure that 100 percent of all batch data reportsBDRs receive a Site Project Manager (SPM) signature release with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP. This release shall ensure the following:					
	 Testing batch QC checks were properly performed. Radiography data are complete and acceptable based on evidence of videotape review of one waste container per day or once per testing batch, whichever is less frequent 					
	 Data generation level independent technical review, validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases. 					
	Independent technical reviewers were not involved in the generation or recording of the data under review.					
	Batch Data review checklists are complete					
	Batch Data Reports are complete and data properly reported					
	Verify that data are within established data assessment criteria and meet all applicable QAOs					
	(Section C3-4b(1))					
4 2	Are procedures in place to ensure that a repeat of the data review process at the data generation level will be performed on a minimum of one randomly chosen waste container every quarter to determine if the verification and validation is performed according to documented procedures? (Section C3-4b)					
43	Are procedures in place and checklists are -available to prepare a ₌ - Site Project Manager (SPM) Summary and a Data Validation Summary (the summaries may be in the same document)? The SPM Summary includes a validation checklist for each batch that is of sufficient detail to document all aspects of a batch data report<u>BDR</u> that could affect data quality. The Data Validation Summary must identify each Batch Data Report<u>BDR</u> reviewed, reviewed , describe how the validation was performed, identify all-problems, and identify-all acceptable and unacceptable data. Summaries must include release signatures. (Section C3-4b(2))					

		Procedure	Documented	Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
44	Are procedures in place to ensure that non-administrative, WAP-related nonconformances first identified at the <u>site project managerSPM</u> level are reported to the Permittees within seven calendar days of identification, that nonconformance reports are prepared within 30 calendar days, and that corrective action is implemented prior to waste shipment? (Section C3-7)					
45	Are procedures in place to ensure that any waste container for which a nonconformance report (NCR) has been written will not be shipped to the WIPP facility unless the condition that led to the NCR for that container is appropriately identified, reconciled, corrected, and documented? Are nonconformance reports prepared for nonconformances identified? Are nonconformances identified and tracked, and does the Site Project ManagerSPM oversee the nonconformance report process? (Section C3-7)					
		Data Transr	nittal			
48	Are procedures in place to ensure that the generator/storage site transmits data by hard copy or electronic copy from the data generation level to the site project level? If electronic, does the generator/site have a hard copy available on demand? (Section C-4a(5))					
50	Are procedures in place to ensure that the generator/storage site inputs the data into the WWIS manually or electronically? (Section C-4a(5))					
51	Are procedures in place to ensure that the generator/storage site enters the data into the WWIS in the exact format required by the database? (Section $C-4a(5)$)					
52	Are procedures in place to ensure all of t he data presented on Table C-3 of the Permit is transmitted to the WWIS? (Table C-3)					
	Record	s and Record	Management			
55	Are procedures in place to ensure that the generator/storage site's hard copy and/or electronic data reports follow the Permittees' format requirements? (Section C-4a(3))					

		Procedure	e Documented	Implementat	nple of ion/ Objective is applicable	Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
56	Are procedures in place to ensure that hard copy or electronic Waste Stream Profile Form will include the following					
	Generator/storage site name					
	Generator/storage site EPA ID					
	 Date of audit report approval by <u>the_NMED</u> (if obtained) 					
	Original generator of waste stream					
	 Whether waste is Contact-Handled<u>contact-handled</u> or Remote- Handled<u>remote-handled</u> 					
	Waste Stream WIPP Identification Number					
	Summary Category Group					
	Waste Matrix Code Group					
	Waste Material Parameter Weight Estimates per unit of waste					
	Waste stream name					
	A description of the waste stream					
	Applicable EPA hazardous waste numbers					
	Applicable TRUCON codes					
	 A listing of acceptable knowledge<u>AK</u> documentation used to identify the waste stream 					
	The waste characterization procedures used and the reference and date of the procedure					
	 Certification signature of Site Project Manager<u>SPM</u>, name, title, and date signed 					
1	(Section C3-6b(1))					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
56a	Are procedures in place to ensure that hard copy or electronic Characterization Information Summary will include the following:					
	Data reconciliation with DQOs					
	 Radiography and visual examination <u>VE</u> summary to document that all-prohibited items are absent in the waste and to verify that the physical form of the waste matches its waste stream description as determined by AK (if applicable). 					
	 A complete listing of all-container identification numbers used to generate the Waste Stream Profile Form<u>WSPF</u>, cross-referenced to each Batch Data Report<u>BDR</u>. 					
	 Complete AK summary, including stream name and number, point of generation, waste stream volume (current and projected), generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other TWBIR information, waste stream description, areas of operation, generating processes, RCRA determinations, radionuclide information, all-references used to generate the AK summary, and any other information required by Permit Attachment C4, Section C4-2b. 					
	 Method for determining Waste Material Parameter Weights per unit of waste. 					
	 List of any AK Sufficiency Determinations requested for the waste stream. 					
	 Certification through acceptable knowledge<u>AK</u> or testing that any waste assigned the hazardous waste number of U134 (hydrofluoric acid) no longer exhibits the characteristic of corrosivity. This is verified by ensuring that no liquid is present in U134 waste. 					
	 A justification for the selection of radiography and/or VE as an appropriate method of characterizing the waste. 					
	(Section C3-6b(2))					
56b	Are procedures in place to assure that ongoing container characterization results are cross referenced to Batch Data ReportsBDRs? (Section C3-6b)					
58	Are procedures in place to ensure that project level reports are compiled into Characterization Information Summaries (Section C3-6b)					

		Procedure	Documented	Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
59	Are procedures in place to ensure that the generator/storage site uses forms for data reporting that are pre-approved forms in site-specific documentation? (Section C3-6)					
60	Are procedures in place to ensure that the generator/storage site's site project manager <u>SPM</u> submits to the WIPP facility a summary of the waste stream information and reconciliation with data quality objectives (DQOs) once a waste stream is characterized? (Section C-4a(5))					
61	Are procedures in place to ensure that the generator/storage site project office completes a WSPF based on the Batch Data ReportsBDRs? (Section C3-6b)					
62	Are procedures in place to ensure that the generator/storage <u>site's</u> <u>Site</u> <u>Project Manager SPM</u> submits the WSPF to the Permittees for DOE's approval along with the accompanying Characterization Information Summary for that waste stream? (Section C-4a(5))					
63	Are procedures in place to ensure that the generator/storage site maintains records related to waste characterization testing activities in the testing facility files, or site project files for those facilities located on-site? (Section $C-4a(6)$)					
64	Are procedures in place to ensure that the appropriate documented training and indoctrination is performed for all i ndividuals and that procedures are documented in site specific QAPjPs and procedures? (Section C3-8)					
66	Are procedures in place to ensure that the generator/storage site has an appropriate records inventory and disposition schedule (RIDS) or equivalent that was prepared and approved by appropriate site personnel? (Section C-4a(6))					
67	Are procedures in place to ensure that the generator/storage site maintains all -records relevant to an enforcement action, regardless of disposition, until they are no longer needed for enforcement action, and then dispositioned per the approved RIDS? (Section C-4a(6))					

			Documented	Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
68	Are procedures in place to ensure that the generator/storage site maintains records that are designated as Lifetime Records for the life of the waste characterization program plus six years, or that the records have been transferred for permanent archival storage to the WIPP Records Archive facility? Lifetime Records include: • Test facility Batch Data ReportsBDRs, • Waste Stream Characterization Package, • Data reduction, validation, and reporting documentation, • Acceptable knowledge documentation, • WSPF and Characterization Information Summary (Section C-4a(6), Table C-2)					
69	Are procedures in place to ensure that the generator/storage site maintains records that are designated as Non-Permanent Records for ten years from the date of record generation, and then dispositioned according per the approved RIDS or transferred to the WIPP Records Archive facility? Non-Permanent Records include: • Nonconformance documentation, • Variance documentation, • Variance documentation, • Calculations and related software documentation, • Training/qualification documentation, • Calculation and related software documentation, • Calculation documentation, • Calibration documentation, • Calibration documentation, • Calibration documentation, • Calibration documentation, • Calibration documentation, • Calibration documentation, • Procurement documentation, • Procurement documentation, • Calculation generation, • Calibration documentation, • Calibration documentation					
70	Are procedures in place to ensure that the generator/storage site has raw data that is identifiable and legible, and provides documentary evidence of quality? (Section C-4a(6))					

I

			Documented	Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
71	Are procedures in place to ensure that if the generator/storage site ceases to operate, that all -records be transferred before closeout? (Section C-4a(6))					
		Shipmer	nt			
72	Are procedures in place to ensure that the generator/storage site accurately completes an EPA Hazardous Waste Manifest prior to shipping the waste to WIPP that contains the following information: Generator/storage site name and EPA ID Generator/storage site contact name and phone number 					
	 Quantity of waste List of up to six state and/or federal hazardous waste numbers in each line item 					
	 Listing of all-container IDsIDS Signature of authorized generator representative (Section C-5b) 					
73	 Are procedures in place to ensure that the generator/storage site accurately completes the following container specific information: Waste stream identification number List of <u>EPA</u> hazardous waste numbers per container Certification data Shipping data (Section C-5b) 					

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to ask whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met

1

2

Example of Implementation/ Objective Comment **Procedure Documented** Evidence, as applicable (e.g., any change in Adequate? Adequate? procedure since last Item WAP Requirement² Location Y/N (Why?) Reviewed Y/N audit, etc.) **General Requirements** Are the primary document(s) required in Permit Attachment C4 containing acceptable knowledge AK information available? (Section C4-2) Has the generator developed a methodology whereby a logical sequence of acceptable knowledgeAK information that progresses from general facility to more detailed waste-specific information can be acquired? (Section C4-2) 136 Does the site have adequate procedures in place to ensure that the Acceptable Knowledge AK process is adequately implemented? Do these procedures facilitate the mandatory traceability analysis performed for each Summary Waste Category Group examined during the audit? (Section C4-2) Does the generator site's TRU mixed waste management program information clearly define (or provide a methodology for defining) waste categorization schemes and terminology, provide a breakdown of the types and guantities of TRU mixed waste generated/stored at the site, and describe

Table C6-2 Acceptable Knowledge (AK) Checklist¹

135

137

138

how waste is tracked and managed at the generator site (including historical and current operations? Do procedures ensure that waste streams are

Does site documentation procedures indicate that the site will document,

justify, and consistently define waste streams and assign EPA hazardous

adequately identified? (Section C4-2a)

waste numbers? (Section C4-2b)

1

			Documented	Implementat	nple of ion/ Objective as applicable	Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	Required ar	nd Addition	al Information			
140	Does the generator site document that the following must be included in the $\frac{1}{2}$ acceptable knowledge <u>AK</u> record:					
	 Map of the site with the areas and facilities involved in TRU waste generation, treatment, and storage identified 					
	 Facility mission description as related to TRU waste generation and management (e.g., nuclear weapons research may involve metallurgy, radiochemistry, and nuclear physics operations that result in specific waste streams) 					
	• Description of the operations that generate TRU waste at the site (e.g., plutonium recovery, weapons design, or weapons fabrication)					
	 Waste identification or categorization schemes used at the facility (e.g., item description codes, content codes) 					
	 Types and quantities of TRU mixed waste generated, including historical generation through future projections 					
	 Correlation of waste streams generated from the same building and process, as appropriate (e.g., sludge, combustibles, metals, and glass) 					
	 Waste certification procedures for retrievably stored and newly generated wastes to be sent to the WIPP facility 					
	(Section C4-2a)					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
141	Does the generator site document that the following shall be collected for each waste stream:					
	 Area(s) and/or building(s) from which the waste stream was or is generated 					
	 B. Waste stream volume and time period of generation (e.g., 100 standard waste boxes of retrievable stored waste generated from June 1977 through December 1977) 					
	C. Waste generating process described for each building (e.g., batch waste stream generated during decommissioning operations of glove boxes), including processes associated with U134 waste generation, if applicable.					
	D. Documentation demonstrating how the site has historically managed the waste, including the historical regulatory status of the waste (i.e., TRU mixed versus TRU non-mixed waste)					
	E. Process flow diagrams (e.g., a diagram illustrating glove boxes from a specific building to a size reduction facility to a container storage area). In the case of research/development, analytical laboratory waste, or the similar processes where process flow diagrams cannot be created, a description of the waste generating processes, rather than a formal process flow diagram, may be included if this modification is justified and the justification is placed in the auditable record					
	F. Material inputs or other information that identifies the chemical content of the waste stream and the physical waste form (e.g., glove box materials and chemical handled during glove box operations, events or processes that may have modified the chemical or physical properties of the waste stream after generation, data obtained through visual examination <u>VE</u> of newly generated waste that later undergoes radiography; information demonstrating neutralization of U134 [hydrofluoric acid] and waste compatibility)					
	(Section C4-2b)					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
142	Do site documents/procedures require that the facility will provide a summary to the Permittees that summarizes-all information collected, including basis and rationale for-all waste stream designations? Is an example of this summary available for audit review? If discrepant hazardous waste data exist in required information, do sites consider applying all-hazardous waste numbers, but assess and evaluate the information to determine the appropriate <u>EPA</u> hazardous waste numbers consistent with RCRA requirements? (Section C4-2b)					
143	Do site procedures indicate that if the required AK information is not available for a particular waste stream, that the waste stream will not be eligible for an AK Sufficiency Determination? (Section C4-2)					
144	 Have the following procedures been prepared? A. Procedures for identifying and assigning the physical waste form of the waste B. Procedures for delineating waste streams and assigning Waste Matrix Codes C. Procedures for resolving inconsistencies in acceptable knowledgeAK documentation D. Procedures for visual examinationVE and/or radiography, if applicable E. For newly generated waste, procedures describing process controls used to ensure prohibited items (specified in the WAP, Permit Attachment C) are documented and managed F. Procedures to ensure radiography and visual examinationVE include a list of prohibited items that the operator shall verify are not present in each container (e.g. liquid exceeding TSDF-WAC limits, corrosives, ignitables, reactives, and incompatible wastes) G. Procedures to document how changes to Waste Matrix Codes, waste stream assignment, and associated EPAEnvironmental Protection Agency hazardous waste numbers based on material composition are documented for any waste H. Procedures that ensure the assignment of EPA hazardous waste numbers is appropriate, consistent with RCRA requirements, and adequately considers site historical waste management I. Procedures for estimating waste material parameter weights 					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
145	Does the generator provide procedures or written commitment to collect additional acceptable knowledge <u>AK</u> information, as available and as necessary to augment mandatory information? (Section C4-2c)					
146	Does the generator site document that all -additional specific, relevant information used in the acceptable knowledge <u>AK</u> process will be identified and its use explained? Is- <u>all_the</u> necessary additional information assembled and has it been appropriately used? (Section C4-2c)					
147	Does the generator site discrepancy analysis documentation (for acceptable knowledgeAK additional and required documentation) indicate that if discrepancies are detected, the site may consider applying all EPA hazardous waste numbers indicated in the required and additional information, but must assess and evaluate the information to determine the appropriate EPA hazardous waste numbers consistent with RCRA requirements? (Section C4-2c)					
		Training				
148	Does the generator site have procedures to ensure that all-the personnel involved with acceptable knowledgeAK waste characterization have the following training, and is this training documented?					
	A. WIPP WAP in Permit Attachment C and the TSDF-WAC specified in this permit					
	B. State and Federal RCRA regulations associated with solid and hazardous waste characterization					
	C. Discrepancy resolution and reporting					
	 D. Site-specific procedures associated with waste characterization using acceptable knowledge<u>AK</u> 					
	(Section C4-3a)					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
		Procedure	s			
149	Has the generator site developed the following procedures, and are these procedures technically sufficient?					
	A. Sites must prepare and implement a written procedure outlining the specific methodology used to assemble acceptable knowledge <u>AK</u> records, including the origin of the documentation, how it will be used, and any limitations associated with the information (e.g., identify the purpose and scope of a study that included limited sampling and analysis data).					
	B. Sites must develop and implement a written procedure to compile the required acceptable knowledge <u>AK</u> record.					
	C. Sites must develop and implement a written procedure that ensures unacceptable wastes (e.g., reactive, ignitable, corrosive) are identified and segregated from TRU mixed waste populations sent to <u>the</u> WIPP <u>facility</u> .					
	D. Sites must prepare and implement a written procedure to evaluate acceptable knowledgeAK and resolve discrepancies. For example, Example if different sources of information indicate different hazardous wastes are present, then sites must include all-sources of information in its records and may choose to either conservatively assign EPA hazardous waste numbers or assign only those numbers deemed appropriate and consistent with RCRA requirements. All information.Information used to justify assignment of EPA hazardous waste numbers must be placed in the auditable record. Further, the assignment of EPA hazardous waste numbers shall be tracked in the auditable record to all-required documentation.					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
149a	E. Sites must prepare and implement a written procedure to identify hazardous wastes and assign the appropriate hazardous waste numbers to each waste stream. The following are minimum baseline requirements/standards that site-specific procedures must include to ensure comparable and consistent characterization of hazardous waste:					
	1. Compile all of the required information in an auditable record.					
	 Review the compiled information and delineate waste streams. Delineation of waste streams must comply with the definition in Permit Attachment C, Section C-0a, and justify combining waste historically managed separately as TRU mixed and TRU non-mixed waste streams into a single waste stream. 					
	 Review the compiled information to determine if the waste stream is compliant with the TSDF-WAC 					
	 Review the required information to determine if the waste is listed under 20.4.1.200 NMAC (incorporating 40 CFR § 261), Subpart D. Assign all-the listed EPA hazardous waste numbers, unless the site chooses to justify an alternative assignment and document the justification in the auditable record. 					
	5. Review the required information to determine if the waste exhibits a hazardous characteristic or may contain hazardous constituents included in the toxicity characteristics specified in 20.4.1.200 NMAC (incorporating 40 CFR § 261, Subpart C. If a toxicity characteristic contaminant is identified and is not included as a listed waste, sites may evaluate available data and assign the toxicity characteristic <u>EPA</u> hazardous waste number consistent with RCRA requirements. All dataData examined to reach the hazardous waste number determination must be placed in the auditable record and must present a clear justification for the EPA hazardous waste number analyses.					
	 Review the compiled information to provide an estimate of the material parameter weights for each container to be stored or disposed of at <u>the</u> WIPP <u>facility</u>. For newly generated waste, procedures shall be developed and implemented to characterize hazardous waste using <u>acceptable knowledgeAK</u> prior to packaging. 					

		Procedure Documented		Implementat	nple of ion/ Objective is applicable	Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
149b	F. Sites shall ensure that results of audits of the <u>site's</u> TRU mixed waste characterization programs at the site are available in the records.					
	G. Sites shall identify all process controls (implemented to ensure that the waste contains no prohibited items and to control hazardous waste content and/or physical form) that have been applied to retrievably stored waste and/or may presently be applied to newly generated waste. Process controls are applied <u>at the time</u> of waste generation/packaging to control waste content, whereas any activities performed <u>after</u> waste generation/packaging to identify prohibited items, hazardous waste content, or physical form are waste characterization activities, not process controls. The AK record must contain specific process control and supporting documentation identifying when these process controls are used to control waste content. See Permit Attachment C, Section C-2 for programmatic requirements related to process controls.					
	(Section C4-3b)					
150	Does the site have implemented procedures which comply with the following criteria to establish acceptable knowledge <u>AK</u> records:					
	A. Acceptable knowledge information shall be compiled in an auditable record, including a road map for all the applicable information.					
	B. The overview of the facility and TRU mixed waste management operations in the context of the facility's mission shall be correlated to specific waste stream information.					
	C. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined.					
	D. A reference list shall be provided that identifies documents, databases, Quality Assurance protocols, and other sources of information that support the acceptable knowledge <u>AK</u> information.					
	E. Container inventories for TRU mixed waste in retrievable storage shall be delineated into waste streams by correlating the container identification to all of the required and additional AK information.					
	(Section C4-3c)					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
151	If the generator site submitted an AK Sufficiency Determination Request for a specific waste stream, did the site provide all of the requisite information for which approval is sought? (Section C-0b)					
		a Accentat	le Knowledge			
			no informedge			
152	Does the generator site have written procedures for the augmentation of all <u>the acceptable knowledgeAK</u> information using testing <u>2</u> . Testing consists of radiography and visual examination <u>VE</u> . Do site procedures indicate that the following testing will be conducted based upon the results of the Determination Request					
	AKSD denied <u>100 percent</u> 100% RTR or VE					
	(Section <u>s</u> C4-1, C-0b)					
155	Does the generator site have procedures for reevaluating acceptable knowledgeAK if the results of the waste confirmation indicate that the waste to be shipped does not match the approved waste stream or if the data from radiography or visual examination VE for waste streams without an AK Sufficiency Determination exhibit this discrepancy? Does this procedure describe how the waste is reassigned, acceptable knowledgeAK reevaluation, and appropriate EPA hazardous waste numbers are assigned? (Section C4-3e)					
156	Do site procedures indicate that debris wastes are assigned toxicity characteristic EPA <u>hazardous waste</u> numbers based on AK regardless of the quantity or concentration? (<u>Section</u> C4-3e)					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	Criteria for Assembling an Acceptabl	e Knowledg	e Record Delin	neating the Wa	aste Stream	
158	If wastes are reassigned to a different waste matrix code based on site visual examination VE or radiography or Permittee confirmation activities, does the generator site have written documentation to ensure that the following steps are followed: F. Review existing information based on the container identification					
	number and document all d ifferences in <u>EPA hazardous waste number</u> assignments					
	G. If differences exist in the <u>EPA</u> hazardous waste numbers that were assigned, reassess and document all required acceptable <u>knowledgeAK</u> information (Section C4-3b) associated with the new designation					
	H. Reassess and document all-testing data associated with the waste					
	 Verify and document that the reassigned waste matrix code was generated within the specified time period, area and buildings, waste generating process, and that the process material inputs are consistent with the waste material parameters identified during radiography or visual examination<u>VE</u> 					
	J. Record all-any_changes to acceptable knowledgeAK records					
	K. If discrepancies exist in the acceptable knowledge <u>AK</u> information for the revised waste matrix code, document the segregation of the affected portion of the waste stream, and define the actions necessary to fully characterize the waste					
	(Section C4-3e)					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	Data Q	uality Requ	irements			
168	Are acceptable knowledge <u>AK</u> processes consistently applied among-all generator sites, and does each generator site comply with the following data quality requirements for acceptable knowledge <u>AK</u> documentation:					
	A. Precision The qualitative determinations, such as compiling and assessing acceptable knowledge <u>AK</u> documentation, do not lend themselves to statistical evaluations of precision. However, the acceptable knowledge <u>AK</u> information will be addressed by the independent review of acceptable knowledge <u>AK</u> information during internal and external audits.					
	B. Accuracy - The percentage of waste containers which require reassignment to a new waste matrix code and/or designation of different hazardous waste numbers based on testing data and discrepancies identified by the Permittees during waste confirmation will be reported as a measure of acceptable knowledge <u>AK</u> accuracy.					
	C. Completeness - The acceptable knowledge <u>AK</u> record must contain 100 percent of the information (Permit Attachment <u>C4, Section</u> C4-3). The usability of the acceptable knowledge <u>AK</u> information will be assessed for completeness during audits.					
168a	D. Comparability - Comparability is ensured through sites meeting the training requirements and complying with the minimum standards outlined for procedures that are used to implement the acceptable knowledge <u>AK</u> process. All sites <u>Sites</u> must assign hazardous waste numbers in accordance with Permit Attachment <u>C4, Section</u> C4-4 and provide this information regarding its waste to other sites who store or generate a similar waste stream.					
	E. Representativeness - Representativeness is a qualitative parameter that will be satisfied by ensuring that the process of obtaining, evaluating, and documenting acceptable knowledge <u>AK</u> information is performed in accordance with the minimum standards established in Permit Attachment C4. Sites also must assess and document the limitations of the acceptable knowledge <u>AK</u> information used to assign hazardous waste numbers (e.g., purpose and scope of information, date of publication, type and extent to which waste parameters are addressed).					
	(Section C3-3)					

1

	F		Procedure Documented		nple of ion/ Objective is applicable	Comment (e.g., any change in
	WAP Requirement ²	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
169	Does the generator site address quality control by tracking its performance with regard to the use of acceptable knowledgeAK by: 1) assessing the frequency of inconsistencies among information, and 2) documenting the results of waste discrepancies identified by the generator/storage site during waste characterization or the Permittees during waste confirmation using radiography, review of radiography audio/video recordings, visual examinationVE, or review of visual examinationVE records. In addition, the acceptable knowledgeAK process and waste stream documentation must be evaluated through internal assessments by generator/storage site quality assurance organizations. (Section C4-3e)					

1. <u>The NMED expects a traceability analysis to be performed, the results of which should be presented on this checklist under the "Examples of Implementation" column.</u> Further, the traceability analysis process and results should be discussed in the Final Audit Report.

2. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to determine whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

| 1 2

Table C6-3—— Radiography Checklist

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	Quality	Assurance	Objectives			
233	Are process procedures in place to meet the following Quality Assurance Objectives?					
	Precision					
	 Does the site describe in its QAPjP and SOP(s) activities to reconcile any discrepancies between two radiography operators with regard to identification of the waste matrix code, liquids in excess of TSDF-WAC limits, and compressed gases through independent replicate scans and independent observations? And additionallyIn addition, does the site describe in its QAPjP and SOP(s) activities to verify the precision of radiography prior to use by tuning precisely enough to demonstrate compliance with QAOs through viewing an image test pattern? 					
	Accuracy					
	 Was accuracy obtained by using a target to tune the image for maximum sharpness and by requiring operators to successfully identify 100 percent of the required items in a training container during their initial qualification and subsequent requalification? 					
233a	Completeness					
	 Was an audio/videotape (or equivalent media) of the radiography examination and a radiography data form validated according to the requirements in <u>Permit Attachment C3</u>, Section C3-4? 					
	 Was an audio/videotape (or equivalent media) of the radiography examination and a radiography data form obtained for <u>100</u> <u>percent</u>400% of the waste containers subject to radiography? 					
	Comparability					
	 Is comparability ensured through the use of standardized radiography procedures and operator training and qualifications 					
	(Section C3-2a)					

		Procedure Documented		Implementat	nple of ion/ Objective as applicable	Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	Characterizatio	on and Syste	em Requireme	nts		
234	Does the site have procedures to ensure that radiography is used to identify and verify waste container contents and verify the waste's physical form? Does the site have procedures to identify prohibited materials? (Section <u>s</u> C- 3b; C1-1)					
235	Do procedures or other supporting documentation ensure that <u>every</u> waste container will undergo radiography and/or VE as necessary to augment AK? (Section C-3b)					
236	Do procedures ensure that containers whose contents prevent full examination are examined by visual examination VE rather than by radiography unless the site certifies that visual examination VE would provide no additional relevant information for that container based on the AK information for the waste stream? (Section C1-1)					
237	Do procedures or other supporting documentation ensure that the physical form determined by radiography is compared with the waste stream descriptions? If discrepancies are noted, will a new waste stream be identified? (Section C-3b)					
238	Are there procedures to ensure the data is obtained from an audio/video recorded scan provided by trained radiography operators? (Section C1-1)					
239	Were-all activities required to achieve the radiography objective described in site Quality Assurance Project Plans (QAPjPs) and Standard Operating Procedures (SOPs)? (Section C3-2)					
240	 Did the radiography system consist of the following equipment or equivalent: an X-ray producing device? an imaging system? an enclosure for radiation protection? a waste container handling system? an audio/video recording system or equivalent? an operator control and data acquisition station? (Section C1-1) 					

	WAP Requirement ¹		Procedure Documented		nple of ion/ Objective as applicable	Comment (e.g., any change in
			Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
241	Did the X-ray producing device have controls which allow the operator to vary voltage, thereby controlling image quality? Was it possible to vary the voltage, typically between 150-400 kV, to provide an optimum degree of penetration through the waste? Was high-density material examined with the X-ray device set on the maximum voltage? Was low-density material examined at lower voltage settings to improve contrast and image definition? (Section C1-1)					
242	Do procedures or other documentation ensure that an audio/videotape or equivalent is made of the waste container scan and maintained as a non-permanent record? (Section C1-1)					
	Da	ata Compila	tion			
243	Are there procedures to ensure that a radiography data form is used to document the waste matrix code, ensure the waste container contains no ignitable, corrosive or reactive waste by documenting the absence of liquids in excess of TSDF-WAC limits or compressed gases, and verify that the physical form of the waste is consistent with the waste stream description documented on the WSPF? (Section C1-1)					
245	If radiography indicates that the waste does not match the waste stream description, do procedures ensure that the appropriate corrective action was taken? (Section C-3b)					
246	If a discrepancy is noted, do procedures ensure that the proper waste stream assignment is determined, the correct <u>EPA</u> hazardous waste numbers assigned, and the resolution documented? (Section C-3b)					
		Training				
247	Do site procedures ensure that only trained personnel are allowed to operate radiography equipment? (Section C1-1)					
248	Do site procedures ensure that training requirements for radiography operators is based upon existing industry standard training requirements? (Section C1-1)					
249	Does the documented training program provide radiography operators with both formal and on-the-job training (OJT)? (Section C1-1)					

		Procedure Documented		Implementat	nple of ion/ Objective is applicable	Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
250	Does the documented training program ensure that the radiography operators are instructed in the specific waste generating practices and typical packaging configurations expected to be found in each waste stream at the site? (Section C1-1)					
251	Does the documented training program ensure that the OJT and apprenticeship are conducted by an experienced, qualified radiography operator prior to qualification of the candidate? (Section C1-1)					
252	Is the documented training program site specific? (Section C1-1)					
262	Does the documented training program ensure that a training drum with various container sizes is scanned by each operator on a semiannual basis? Is the videotape reviewed by a supervisor to ensure that operators' interpretations are remain consistent and accurate? (Section C1-1)					
263	Do site procedures ensure that the site prepares Testing Batch Data Reports or equivalent which includes-all data pertaining to radiography for up to 20 waste containers without regard to waste matrix? (Section C3-4)					
	Qu	ality Assur	ance			
265	Does the documented training program ensure that the imaging system characteristics are verified on a routine basis? (Section C1-1)					
266	Do procedures ensure that independent replicate scans and replicate observations of the video output of the radiography process are performed under uniform conditions and procedures? Are independent replicate scans performed on one waste container per day or per testing batch of 20 samples, which everwhichever is less frequent, by a qualified radiography operator that was not involved in the original scan of the waste container? Are independent observations of one scan (not the replicate scan) performed once per day or per testing batch, which everwhichever is less frequent, by a qualified radiography operator that was not involved in the original scan of the waste container? (Section C1-1)					
267	Do procedures ensure that oversight functions include periodic audio/video media reviews of accepted waste containers, are performed by qualified radiography operators that were not involved in the original scans of the waste containers? (Section C1-1)					

	WAP Requirement ¹		Procedure Documented		nple of ion/ Objective is applicable	Comment (e.g., any change in
			Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
268	Is the site project manager <u>SPM</u> responsible for monitoring the quality of the radiography data and calling for corrective action, when necessary? (Section C1-1)					
	Data Validation, Re	eview, Verifi	cation and Rep	orting		
277	Do procedures ensure that all -applicable data generation review verification and validation activities specified in <u>Permit Attachment C3, Section</u> C3-4 are followed, including- all signatory releases? (Section C3-4)					
278	Do procedures ensure that radiography tapes have been reviewed at a frequency of one waste container per day or once per testing batch, whichever is less frequent, to ensure data are correct and completed? (Section C1-1)					
279	Do procedures ensure that all -applicable project-level signatory releases and DQOs (Section C3-3) as specified in the WAP are performed? (Section C3-4b)					
282	At the data generation level, do procedures ensure that all electronic and video data stored appropriately to ensure that waste container, sample, and associated QA data are readily retrievable? Are radiography tapes reviewed, at a frequency of one waste container per day or once per testing batch, whichever is less frequent, against the data reported on the radiography form? (Sections C3-4a, C3-4a(1))					
283	At the project level, do procedures require the <u>Site Project ManagerSPM</u> to certify that the radiography data are complete and acceptable based on the videotape review of at least one waste container per testing batch or daily, whichever is less frequent? (Section C3-4b(1))					

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to determine whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

1

2

2

3

Table C6-4—— Visual Examination (VE) Checklist

			Procedure Documented		nple of ion/ Objective is applicable	Comment (e.g., any change in
	WAP Requirement ¹	Location	Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
		Training				
296	Is there documentation which shows that a standardized training program for visual examination \underline{VE} operators has been developed? Is it specific to the site and include the various waste configurations generated/stored at the site? (Section C1-2)					
297	Is there documentation which shows that the visual examination <u>VE</u> operators receive training on the specific waste generating processes, typical packaging configurations, and waste material parameters expected to be found in each Waste Matrix Code at the site? (Section C1-2)					
298	Are the visual examination \underline{VE} personnel requalified once every two years? (Section C1-2)					
298a	 Does the training include the following regardless of Summary Category Group? Identifying and describing the contents of a waste container by examining all-items in waste containers of previously packaged waste. 					
	 Identifying when VE cannot be used to meet the DQOs, (Section C1-2) 					
	Visual Examir	nation Expe	rt Requirement	ts		
300	Does documentation ensure that the site has designated a visual examination VE expert? Is the visual examination VE expert familiar with the waste generating processes that have taken place at the site? Is the visual examination VE expert familiar with all of the types of waste being characterized at that site? (Section C1-2)					
301	Does documentation ensure that the visual examination VE expert shall be responsible for the overall direction and implementation of the visual examination VE aspects of the program? Does the site's QAPjP specify the selection, qualification, and training requirements of the visual examination VE expert? (Section C1-2)					

	WAP Requirement ¹		Procedure Documented		nple of ion/ Objective is applicable	Comment (e.g., any change in
			Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	Visual Ex	amination	Procedures			
304	Do procedures indicate that all visual examination <u>VE</u> activities are documented on video/audio media or VE performed by using a second operator to provide additional verification by reviewing the contents of the waste container to ensure correct reporting? (Section C1-2)					
304a	Are procedures in place to ensure that when VE is performed using a second operator, each operator performing VE shall observe for themselves the waste being placed in the container or the contents within the examined waste container when waste is not removed? (Section C1-2)					
313	Do site procedures ensure that when liquid is found, the non-transparent internal container holding the liquid will be assumed to be filled with liquid and this volume will be added to the total liquid in the container being characterized using VE? The container being characterized using VE would then be rejected and/or repackaged to exclude the internal container if it is over the TSDF-WAC limits. (Section C-3b)					

		Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in
	WAP Requirement ¹		Adequate? Y/N (Why?)	ltem Reviewed	Adequate? Y/N	procedure since last audit, etc.)
	Quality	Assurance	Objectives			
314	Are process procedures in place to meet the following Quality Assurance Objectives?					
	Precision					
	 Precision is maintained by reconciling any discrepancies between the operator and the independent technical reviewer with regard to identification of waste matrix code, liquids in excess of TSDF-WAC limits, and compressed gases. 					
	Accuracy					
	 Accuracy is maintained by requiring operators to pass a comprehensive examination and demonstrate satisfactory performance in the presence of the VE expert during their initial qualification. VE<u>Visual examination</u> operators shall be requalified every two years. 					
	Completeness					
	 A validated VE data form will be obtained for 100 percent of the waste containers subject to VE. 					
	Comparability					
	 The comparability of VE data from different operators shall be enhanced by using standardized VE procedures and operator qualifications. 					
	(Section C3-2b)					

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to determine whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

ATTACHMENT C7

TRU WASTE CONFIRMATION

ATTACHMENT C7

TRU WASTE CONFIRMATION

TABLE OF CONTENTS

Introdu	uction				3
C7-1	Permit	tee Confirn	nation of TRU	Mixed Waste	3
				sentative Subpopulation of the Waste	
				Confirmation Training Requirements	
	C7-1b	• • •		Requirements	
				Training	
		()		TRU Waste Confirmation Radiographer	
			- (/(/	Certification Level 1 Qualification	5
			C7-1b(1)(ii)		
				Qualification	6
		C7-1b(2)	Radiography	Oversight	
	C7-1c			hods Requirements	
		C7-1c(1)	Visual Exam	ination Training	9
			C7-1c(1)(i)	TRU Waste Confirmation Visual Examination	
				Level 1 Qualification	9
			C7-1c(1)(ii)	TRU Waste Confirmation Visual Examination	
				Level 2 Qualification	10
				ination Oversight	
	C7-1d			ctives for Radiography and Visual Examination	
				Quality Assurance Objectives	
		C7-1d(2)	Visual Exam	ination Quality Assurance Objectives	12
	C7-1e	Review ar	nd Validation o	of Radiography and Visual Examination Data Used	
		for Waste			
		C7-1e(1)		Technical Review	
		C7-1e(2)		ement Representative Review	
		C7-1e(3)	DOE Manag	ement Representative Training	13
C7-2	Nonco	mpliant Wa	aste Identified	During Waste Confirmation	14

1	LIST OF FIGURES

2 Figure

Title

3 Figure C7-1 Overview of Waste Confirmation

ATTACHMENT C7

TRU WASTE CONFIRMATION

Introduction 3

1

2

The Permittees demonstrate compliance with the waste analysis requirements of the Permit by 4

ensuring that the waste characterization processes performed by generator/storage sites (sites) 5

produce data compliant with the Waste Analysis Plan (WAP) and through the waste screening 6

and verification processes. Verification occurs at three levels: 1) the data generation level, 2) 7

the project level, and 3) the Permittee level. The Permittees also examine a representative 8

subpopulation of waste prior to shipment to confirm that the waste contains no ignitable. 9

corrosive or reactive waste: and that assigned U.S. Environmental Protection Agency (EPA) 10

hazardous waste numbers are allowed by the Permit. The waste confirmation activities 11

described herein occur prior to shipment of the waste from the generator/storage site to the 12

Waste Isolation Pilot Plant (WIPP) facility WIPP. 13

C7-1 Permittee Confirmation of TRU Mixed Waste 14

Waste confirmation is defined in Permit Part 1, Section 1.5.12 as the activities performed by the 15

Permittees or the co-Permittee the U.S. Department of Energy (DOE), pursuant to this Permit 16

Attachment, to satisfy the requirements specified in Section 310 of Pub. L. 108-447. Waste 17

confirmation occurs after waste containers have been certified for shipment to and disposal at 18 the WIPP facility. The general confirmation process for WIPP waste is presented in Figure C7-1.

19

<u>C7-1a</u> Confirmation of a Representative Subpopulation of the Waste 20

The Permittees shall confirm that the waste contains no ignitable, corrosive, or reactive waste 21

through radiography (Section C7-1b) or the use of visual examination (VE) (Section C7-1c) of a 22

statistically representative subpopulation of the waste. Prior to shipment to the WIPP facility, 23

waste confirmation will be performed on randomly selected containers from each contact-24

handledCH and remote-handledRH transuranic (TRU) mixed waste stream shipment. Figure 25

C7-1 presents the overall waste verification and confirmation process. 26

Waste confirmation encompasses ensuring that the physical characteristics of the TRU mixed 27 waste correspond with its waste stream description and that the waste does not contain liquid in 28 excess of Treatment, Storage, and Disposal Facility-Waste Acceptance Criteria (TSDF-WAC) 29 limits or compressed gases. These techniques can detect liquid that exceeds 4 one percent 30 volume of the container and containerized gases, which are prohibited from storage or disposal 31 at the WIPP facility. The prohibition of liquid in excess of TSDF-WAC limits and containerized 32 gases prevents the storage or disposal of ignitable, corrosive, or reactive wastes. Radiography 33 and/or visual examination VE will ensure that the physical form of the waste matches its waste 34 stream description (i.e., Homogeneous Solids, Soil/Gravel, or Debris Waste). The results of 35 waste confirmation activities, including radiography and visual examination VE records (data 36 sheets, packaging logs, and/or video and audio recordings) will be maintained in the WIPP 37 facility operating record Operating Record. Noncompliant waste identified during waste 38

confirmation will be managed as described in Section C7-2. 39

- 1 The Permittees shall randomly select at least 7<u>seven</u> percent of each waste stream shipment
- 2 for waste confirmation. This equates to a minimum of one container from each fourteen
- 3 containers in each waste stream in each designated shipment. If there are less than fourteen
- 4 containers from a waste stream in a particular shipment, a minimum of one container from the
- 5 waste stream shipped will be selected. If the random selection of containers in a shipment
- 6 occurs prior to loading the waste containers into the <u>shipping package</u>Shipping Package, the
- 7 randomly selected containers may be consolidated into a single Type B package consistent with
- 8 transportation requirements. Documentation of the random selection of containers for waste
- ⁹ confirmation will be placed in the WIPP facility operating record<u>Operating Record</u>.

10 For each container selected for confirmation in accordance with the process above, the

- Permittees will examine the respective nonconformance report (NCR) documentation to verify
- NCRs have been dispositioned for the selected container as required by Permit Attachment C3,
 Section C3-7.

14 <u>C7-1a(1)</u> TRU Waste Confirmation Training Requirements

¹⁵ <u>Transuranic TRU</u> waste confirmation may be completed by performing actual radiography/visual

16 examination <u>VE</u> on the waste container(s) or by a review of radiography/visual examination <u>VE</u>

media and records. This allows for a tiered approach for the training of the Permittees' WIPP

18 TRU waste confirmation personnel.

19 <u>The Permittees'</u> TRU waste confirmation personnel may be trained to either review

²⁰ radiography/visual examination<u>VE</u> media and records (Level 1) or to perform actual

radiography/visual examination <u>VE</u> on the waste container(s) (Level 2). Level 2 personnel may

also perform waste confirmation by review of media and records.

23 C7-1b Radiography Methods Requirements

Radiography has been developed by the Permittees specifically to aid in the examination and

identification of containerized waste. The Permittees shall describe allthe activities required to

achieve the radiography objectives in standard operating procedures (**SOPs**). These SOPs shall

include instructions specific to the radiography system(s) used by the Permittees at an off-site
 facility (e.g., the generator/storage site). For example, to detect liquid, some systems require the

container to be rotated back and forth while other systems require the container to be tilted.

30 A radiography system (e.g., real time radiography, digital radiography/computed tomography)

normally consists of an $X_{\underline{X}}$ -ray-producing device, an imaging system, an enclosure for radiation

protection, a waste container handling system, a video and audio recording system, and an

operator control and data acquisition station. Although these six components are required, it<u>lt</u> is

expected there will be some variation within a given component between radiography systems.

The radiography system shall have controls, or an equivalent process, which allow the operator to control image quality. On some radiography systems, it should be possible to vary the

voltage, typically between 150 to 400 kilovolts (kV), to provide an optimum degree of

penetration through the waste. For example, high-density material should be examined with the

 $\frac{1}{2}$ $\frac{1}$

40 waste container. Low-density material should be examined at lower voltage settings to improve

41 contrast and image definition. The imaging system typically utilizes either a fluorescent screen

and a low-light television camera or x-ray detectors to generate the image.

- To perform radiography, the waste container is scanned while the operator views the television 1 2 screen. A video and audio recording is made of the waste container scan and is maintained in the WIPP facility operating record Operating Record as a non-permanent record. A radiography 3 data form is also used to document the Waste Matrix Code, ensure that the waste container 4 contains no ignitable, corrosive, or reactive waste by documenting the absence of liquid in 5 excess of TSDF-WAC limits or compressed gases, and verify that the physical form of the waste 6 is consistent with the waste stream description documented on the Waste Stream Profile Form 7 (WSPF). Containers whose contents prevent full examination of the remaining contents shall be 8 subject to visual examination VE unless the Permittees certify that visual examination VE would 9 provide no additional relevant information for that container based on the acceptable knowledge 10 information for the waste stream. Such certification shall be documented in the WIPP facility 11
- 12 operating record Operating Record.
- 13 For containers that have been characterized using radiography by the generator/storage sites in
- accordance with the method in <u>Permit</u> Attachment C1, Section <u>C1-1</u>C1-3, the Permittees may
- perform confirmation by review of the generator/storage site's radiography audio/video
- 16 recordings.
- 17 For containers which contain classified shapes and undergo radiography, the radiography will
- 18 occur at a facility with appropriate security provisions and the video and audio recording will be
- 19 considered classified. The radiography data forms will not contain classified information.
- 20 <u>C7-1b(1)</u> Radiography Training
- 21 The radiography system involves qualitative and semiquantitative evaluations of visual displays.
- 22 Operator training and experience are the most important considerations for ensuring quality
- controls in regard to the operation of the radiography system and for interpretation and
- disposition of radiography results. Only trained personnel shall be allowed to operate
- ²⁵ radiography equipment.
- Radiographer Level 1 personnel performing TRU mixed waste confirmation shall be trained in:
- TRU Waste Confirmation Radiographer Level 1 Qualification.
- Radiographer Level 2 personnel performing TRU mixed waste confirmation shall be trained in:
- TRU Waste Confirmation Radiographer Certification Level 2 Qualification.

30 <u>C7-1b(1)(i)</u> TRU Waste Confirmation Radiographer Certification Level 1 Qualification

- Level 1 radiographer operators are instructed in the specific waste-generating practices and
- typical packaging configurations expected to be found in each Waste Matrix Code at each site
- shipping waste to the WIPP facility. The on-the-job training (**OJT**) and apprenticeship is
- conducted by an experienced, qualified radiography operator or trainer prior to the qualification
- of the training candidate. Radiography operators are qualified once every two years.
- ³⁶ The level <u>Level</u> 1 radiography training program includes the following elements:
- 37 Formal Training

1	• F	Project Requirements
2	• 5	State and Federal Regulations
3	• B	Basic Principles of Radiography
4 5		Radiography of Waste Forms (including the ability to identify liquid and compressed ases which will be verified by the radiography subject matter expert)
6 7		Vaste Stream-Specific Instruction (e.g., specific waste-generating processes, typical ackaging configurations, waste material parameters)
8 9	On-the-Jol	b Training
10	• 5	System Operation (equipment and procedures used by Level 1 radiographers)
11	• 10	dentification of Packaging Configurations
12	• 10	dentification of Waste Material Parameters/Waste Matrix Codes
13	• 10	dentification of liquid in excess of the TSDF-WAC limits and compressed gases
14 15	• \	erification of waste stream description
16	<u>C7-1b(1)(ii</u>	i) TRU Waste Confirmation Radiographer Level 2 Qualification
17	Level 2 rad	diography operators are instructed in the specific waste-generating practices and

Level 2 radiography operators are instructed in the specific waste-generating practices and
 typical packaging configurations expected to be found in each Waste Matrix Code at each site
 shipping waste to the WIPP facility. The OJT and apprenticeship are conducted by an
 experienced qualified radiography operator prior to the qualification of the training candidate.
 Radiography operators are requalified once every two years.

22 The Level 2 radiography training program included the following elements:

23 Formal Training

- Project Requirements
- State and Federal Regulations
- Basic Principles of Radiography
- Radiographic Image Quality
- Radiographic Scanning Techniques
- Application Techniques

- Radiography of Waste Forms
 - Standards, Codes, and Procedures for Radiography
 - Waste Stream-Specific Instruction
- ⁴ 5 On-the-Job Training

2

3

11

- 6 System Operation
- 7 Identification of Packaging Configurations
- 8 Identification of Waste Material Parameters/Waste Matrix Codes
- Identification of liquid in excess of the TSDF-WAC limits and compressed gases
- Verification of waste stream description

12 C7-1b(2) Radiography Oversight

The Permittees shall be responsible for monitoring the quality of the radiography data and calling for corrective action, when necessary.

A training drum with internal containers of various sizes shall be scanned biennially by each
 Level 2 operator. The video and audio media shall then be reviewed by a radiography subject
 matter expert to ensure that operators' interpretations remain consistent and accurate. Imaging
 system characteristics shall be verified on a routine basis.

Independent replicate scans and replicate observations of the video output of the radiography 19 process shall be performed under uniform conditions and procedures. Independent replicate 20 scans shall be performed on one waste container per day or once per shipment, whichever is 21 less frequent. Independent observations of one scan (not the replicate scan) shall also be made 22 once per day or once per shipment, whichever is less frequent, by a qualified radiography 23 operator other than the individual who performed the first examination. When confirmation is 24 performed by review of audio/video recorded scans produced by the generator/storage site as 25 specified in Permit Attachment C1, Section C1-1, independent observations shall be performed 26 on two waste containers per shipment or two containers per day, whichever is less frequent. 27

28 <u>C7-1c</u> Visual Examination Methods Requirements

²⁹ Visual examination (VE) may also be used as a waste confirmation method. <u>Visual</u>

30 <u>examination</u>VE shall be conducted by the Permittees in accordance with written SOPs to

describe the contents of a waste container. Visual examination shall be conducted to identify

and describe all waste items, packaging materials, and waste material parameters. <u>Visual</u>

<u>examination</u>VE may be used to examine a statistically representative subpopulation of the

waste certified for shipment to <u>the WIPP facility</u> to confirm that the waste contains no ignitable, corrosive, or reactive waste. This is achieved by confirming that the waste contains no liquid in

excess of TSDF-WAC limits or compressed gases, and that the physical form of the waste

matches the waste stream description documented on the WSPF. During packaging, the waste

container contents are directly examined by trained personnel. This form of waste confirmation

1 may be performed by the Permittees at a generator/storage site. The VE may be documented

- 2 on video and audio media, or by using a second operator to provide additional verification by
- 3 reviewing the contents of the waste container to ensure correct reporting. When VE is
- 4 performed using a second operator, each operator performing the VE shall observe for
- themselves the waste being placed in the waste container or the contents within the examined
- waste container when waste is not removed. The results of all-VE shall be documented on VE
 data forms, which are used to document (1) the Waste Matrix Code, (2) that the waste container
- contains no ignitable, corrosive, or reactive waste by documenting the absence of liquids in
- excess of TSDF-WAC limits or compressed gases, and (3) that the physical form of the waste is

consistent with the waste stream description documented on the WSPF.

In order to keep radiation doses as low as reasonably achievable at generator/storage sites, the Permittees may use their own trained VE operators to perform VE for waste confirmation by reviewing generator/storage site VE data, which includes VE data forms, waste packaging records, and may also include audio/video media. The Permittees shall document their review of generator/storage site VE data on confirmation data forms.

16 If the generator/storage site documented VE using audio/video media in accordance with Permit

Attachment C1, Section C1-2, the Permittees must use the audio/video media to perform confirmation. If the Permittees perform waste confirmation by review of audio/video media, the audio/video record of the VE must be sufficiently complete for the Permittees to confirm the Waste Matrix Code and waste stream description, and verify the waste contains no liquid in excess of TSDF-WAC limits or compressed gases. Generator/storage site VE video/audio

media subject to review by the Permittees shall meet the following minimum requirements:

- The video/audio media shall record the waste packaging event for the container such that all-waste items placed into the container are recorded in sufficient detail and shall contain an inventory of waste items in sufficient detail that a trained Permittee VE operator can identify the associated waste material parameter.
- The video/audio media shall capture the waste container identification number.
- The personnel loading the waste container shall be identified on the video/audio media or on packaging records traceable to the loading of the waste container.
- The date of loading of the waste container will be recorded on the video/audio media or on packaging records traceable to the loading of the waste container.
- ³² VE<u>Visual examination</u> audio/video media of containers that contain classified shapes shall be ³³ considered classified information.

If the generator/storage site did not document VE using audio/video media, the Permittees may 34 use their own trained VE operators to perform VE for waste confirmation by reviewing VE data 35 forms or packaging records prepared by the generator/storage site. To be acceptable, the 36 generator/storage site VE data forms or packaging records must be signed by two 37 generator/storage site personnel who witnessed the packaging of the waste and must provide 38 sufficient information for the Permittees to determine that the waste container contents match 39 the waste stream description on the WSPF and the waste contains no liquids in excess of 40 TSDF-WAC limits or compressed gases. Generator/storage site VE forms or packaging records 41

subject to review by the Permittees shall meet the following minimum requirements:

- At least two generator site personnel <u>who witnessed the packaging of the waste</u> shall
 approve the data forms or packaging records attesting to the contents of the waste
 container.
- The data forms or packaging records shall contain an inventory of waste items in
 sufficient detail that a trained Permittee VE operator can identify the associated waste
 material parameters.
- The waste container identification number shall be recorded on the data forms or packaging records.

Visual examination video<u>/audio</u> media of containers which contain classified shapes shall be
 considered classified information. Visual examination data forms will not contain classified
 information.

12 <u>C7-1c(1) Visual Examination Training</u>

13 Visual Examination Operator/Expert Level 1 personnel performing TRU mixed waste 14 confirmation shall be trained in:

• TRU Waste Confirmation Visual Examination Level 1 Qualification.

Visual Examination Operator/Expert Level 2 performing TRU mixed waste confirmation shall be trained in:

• TRU Waste Confirmation Visual Examination Level 2 Qualification.

19 <u>C7-1c(1)(i)</u> TRU Waste Confirmation Visual Examination Level 1 Qualification

20 Level 1 visual examination <u>VE</u> personnel are instructed in the specific waste-generating

21 processes, typical packaging configurations, and waste material parameters expected to be

found in each Waste Matrix Code in the waste stream being confirmed using visual

examination<u>VE</u>. The OJT and apprenticeship are conducted by an operator experienced and

qualified in visual examination \underline{VE} or a qualified trainer prior to qualification of the candidate.

The training is waste stream specific to include the various waste configurations being

confirmed. For example, the particular physical forms and packaging configurations at each site will vary and operators shall be trained on types of waste that are generated, stored, and/or

- will vary and operators shall be trained on types of waste that are generated, stored, and/or
 characterized at that particular site. -Visual examination personnel are requalified once every
 two years.
- ³⁰ The Level 1 visual examination<u>VE</u> training program included the following elements:
- 31 Formal Training
- Project Requirements
- State and Federal Regulations
- Batch Data Report Forms

- Waste Stream-Specific Instruction (e.g., waste-generating processes, typical packaging configurations, waste material parameters)
- 4 On-the-Job Training

2 3

5

6

7

8

9

10 11

- System Operation (equipment and procedures used by Level 1 visual examination <u>VE</u> personnel)
- Identification of Packaging Configurations
 - Identification of Waste Material Parameters/Waste Matrix Codes
 - Identification of liquid in excess of the limits in the TSDF-WAC and compressed gases
- Verification of waste stream description

12 <u>C7-1c(1)(ii)</u> TRU Waste Confirmation Visual Examination Level 2 Qualification

Level 2 visual examination VE personnel are instructed in the specific waste-generating 13 processes, typical packaging configurations, and waste material parameters expected to be 14 found in each Waste Matrix Code in the waste stream being confirmed using visual 15 examination VE. The OJT and apprenticeship are conducted by an operator experienced and 16 gualified in visual examination VE or a gualified trainer prior to gualification of the candidate. 17 The training is waste stream specific to include the various waste configurations being 18 confirmed. For example, the particular physical forms and packaging configurations at each site 19 will vary so operators shall be trained on types of waste that are generated, stored, and/or 20 characterized at that particular site. Visual examination personnel are regulified once every 21 22 two years.

- ²³ The Level 2 visual examination <u>VE</u> training program includes the following elements:
- 24 Formal Training
- Project Requirements
- State and Federal Regulations
- Batch Data Report Forms
- Application Techniques
- Waste Stream-Specific Instruction (e.g., specific waste-generating processes, typical
 packaging configurations, waste material parameters)
- 31 On-the-Job Training
- Identification of Packaging Configurations
- Identification of Waste Material Parameters/Waste Matrix Codes

- Identification of liquid in excess of the TSDF-WAC limits and compressed gases
 - Verification of waste stream description
- 2 3 4

<u>C7-1c(2)</u> Visual Examination Oversight

5 The Permittees shall designate at least one VE expert. The VE expert shall be familiar with the

6 processes that were used to generate the waste streams being confirmed using VE. The VE

7 expert shall be responsible for the overall direction and implementation of the Permittees

⁸ '<u>sPermittees'</u> VE program. The Permittees shall specify the selection, qualification, and training

⁹ requirements of the visual examination \underline{VE} expert in an SOP.

10 <u>C7-1d</u> Quality Assurance Objectives (QAOs) for Radiography and Visual Examination

The <u>Quality Assurance Objectives (QAOs)</u>QAOs the Permittees must meet for radiography and visual examination<u>VE</u> are detailed in this section. If the QAOs described below are not met, then

corrective action as specified in Permit Attachment C3, Section C3-7 shall be taken.

14 <u>C7-1d(1)</u> Radiography <u>Quality Assurance Objectives</u>QAOs

The QAOs for radiography are detailed in this section. If the QAOs described below are not met, then corrective action shall be taken.

17 Data to meet these objectives must be obtained from a video and audio recorded scan provided

18 by trained radiography operators. Results must also be recorded on a radiography data form.

19 The precision, accuracy, representativeness, completeness, and comparability objectives for

²⁰ radiography data are presented below.

21 Precision

22 Precision is maintained by reconciling any discrepancies between two radiography operators

with regard to the waste stream waste confirmation, identification of liquid in excess of TSDF-

24 WAC limits, and identification of compressed gases through independent replicate scans and

25 independent observations.

26 <u>Accuracy</u>

Accuracy is obtained by using a target to tune the image for maximum sharpness and by requiring operators to successfully identify 100 percent of the required items in a training container during their initial gualification and subsequent regualification.

30 <u>Representativeness</u>

Representativeness is ensured by performing radiography on a random sample of waste

containers from each waste stream in each shipment.

33 <u>Completeness</u>

A video and audio media recording of the radiography examination and a validated radiography

data form will be obtained for 100 percent of the waste containers subject to radiography.

1 <u>Comparability</u>

- 2 The comparability of radiography data from different operators shall be enhanced by using
- 3 standardized radiography procedures and operator qualifications.

4 <u>C7-1d(2)</u> Visual Examination <u>Quality Assurance ObjectivesQAOs</u>

- 5 Results must be recorded on a VE data form. The precision, accuracy, representativeness,
- 6 completeness, and comparability objectives for VE data are presented below.

7 Precision

- 8 Precision is maintained by reconciling any discrepancies between the operator and the
- 9 independent technical reviewer with regard to the waste stream waste confirmation,
- ¹⁰ identification of liquid in excess of TSDF-WAC limits, and identification of compressed gases.

11 Accuracy

Accuracy is maintained by requiring operators to pass a comprehensive examination and

demonstrate satisfactory performance in the presence of the VE expert during their initial

14 qualification. <u>Visual examination</u>VE operators shall be requalified once every two years.

15 <u>Representativeness</u>

- 16 Representativeness is ensured by performing VE on a random sample of waste containers
- 17 within each waste stream in each shipment.
- 18 Completeness
- A validated VE data form will be obtained for 100 percent of the waste containers subject to VE.
- 20 <u>Comparability</u>
- The comparability of VE data from different operators shall be enhanced by using standardized VE procedures and operator gualifications.
- 23 <u>C7-1e</u> Review and Validation of Radiography and Visual Examination Data Used for Waste 24 <u>Examination</u>
- This section describes the requirements for review and validation of radiography and VE data by the Permittees.
- 27 <u>C7-1e(1) Independent Technical Review</u>
- 28 The radiography and/or VE confirmation data for each shipment shall receive an independent

technical review. This review will be performed before the affected waste shipment is shipped to

the WIPP facility. The review shall be performed by an individual other than the data generator

who is qualified to have performed the work. The review will be performed in accordance with approved Permittee SOPs and will be documented on a review checklist. The reviewer(s) must

approve the data as evidenced by signature, and as a consequence, ensure the following:

- Data generation and reduction were conducted in a technically correct manner in
 accordance with the methods used (procedure with revision). Data were reported in the
 proper units and correct number of significant figures.
- The data have been reviewed for transcription errors.

Radiography video and audio media recordings have been reviewed (independent 5 • observation) on a waste container basis at a minimum of once per shipment or once per 6 day of operation, whichever is less frequent. The radiography video/audio recording will 7 be reviewed against the data reported on the Permittees 'sPermittees' radiography form 8 to ensure that the data are correct and complete. If review of radiography scans 9 recorded by the generator/storage site was used to perform confirmation, two 10 observations must be performed for each shipment or two observations per day. 11 whichever is less frequent. 12

13 <u>C7-1e(2)</u> DOE Management Representative Review

The radiography and/or visual examination <u>VE</u> data forms and independent technical review
checklist (confirmation data package) for each shipment shall receive a DOE management
review. This review will be performed before the affected waste shipment is disposed of at the
WIPP <u>facility</u>. The review shall be performed by a designated representative of DOE
management. The review will be performed in accordance with approved DOE SOPs and will be
documented on a review checklist. The reviewer(s) must approve the confirmation data package
as evidenced by signature, and as a consequence, ensure the following:

- The data are technically reasonable based on the technique used.
- The data have received independent technical review.
- The data indicate that the waste examined contained no ignitable, corrosive, or reactive waste and that the physical form of the waste was consistent with the waste stream description in the WSPF.
- <u>Quality control</u>QC checks have been performed (e.g., replicate scans, image quality checks).
- The data meet the established QAOs

29 Upon completion of the DOE management representative Management Representative review,

the waste confirmation data for the shipment shall be submitted to the WIPP facility operating

31 record <u>Operating Record</u> as non-permanent records. Waste confirmation data includes

radiography and VE data forms, video/audio media, and review checklists.

- 33 <u>C7-1e(3)</u> DOE Management Representative Training
- The DOE Management Representative performing TRU mixed waste confirmation data package review and approval shall be trained in:
- Required Reading:

<u>The</u>DOE's Quality Assurance Program Document

- Permit Attachments C through C7
- 3 4

1

2

 Required Reading identified in DOE's management procedure, Approval of Contractor-Generator Confirmation Data Packages

5 <u>C7-2</u> Noncompliant Waste Identified During Waste Confirmation

If the Permittees identify noncompliant waste during waste confirmation at a generator/storage 6 site (i.e., the waste does not match the waste stream description documented in the WSPF or 7 there is liquid in excess of TSDF-WAC limits or compressed gases) the waste will not be 8 shipped and the Management and Operating Contractor and the DOE Carlsbad Field Office will 9 be notified. The DOE will suspend further shipments of the affected waste stream and issue a 10 Corrective Action Report (CAR) to the generator/storage site. Shipments of affected waste 11 streams shall not resume until the CAR has been closed. The New Mexico Environment 12 13 Department (NMED) will be notified within 24 hours of any suspension of waste stream shipments due to the identification of noncompliant waste during waste confirmation. 14

15 As part of the corrective action plan in response to the CAR, the generator/storage site will evaluate whether the waste characterization information documented in the Characterization 16 Information Summary (CIS) and/or WSPF for the waste stream must be updated because the 17 results of waste confirmation for the waste stream indicated that the TRU mixed waste being 18 examined did not match the waste stream description. The generator/storage site will thoroughly 19 evaluate the potential impacts on waste that has been shipped to the WIPP facility. The DOE 20 will evaluate the potential that prohibited items were shipped to the WIPP facility and what 21 remedial actions should occur, if any. The results of these evaluations will be provided to the 22 NMED before shipments of affected waste streams resume. If the CISCharacterization 23 Information Summary or WSPF requires revision, shipments of the affected waste stream shall 24 not resume until the revised waste stream waste characterization information has been 25 26 reviewed and approved by the DOE.

If a generator/storage site certifies noncompliant waste more than once during a running 90-day

28 period, <u>the</u>DOE will suspend acceptance of that site's waste until <u>the</u>DOE finds that all

corrective actions have been implemented and the site complies with all-applicable

³⁰ requirements of the WAP.

FIGURES

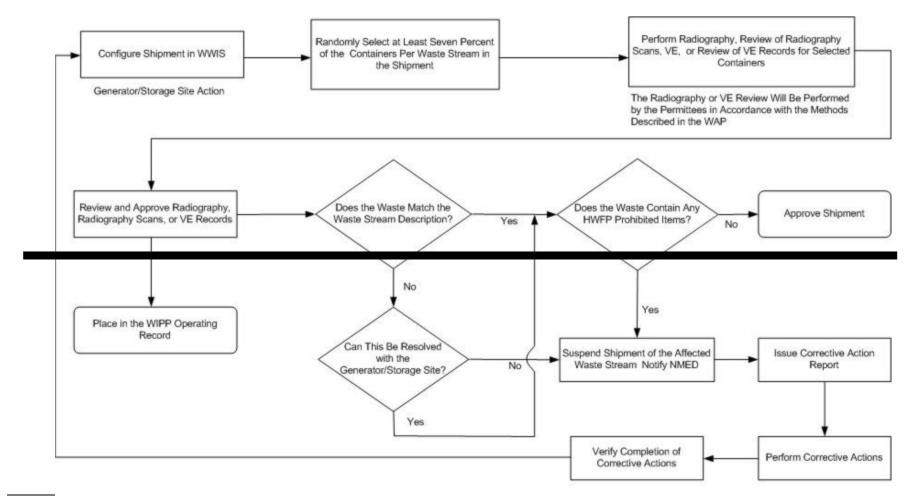


Figure C7-1 Overview of Waste Confirmation

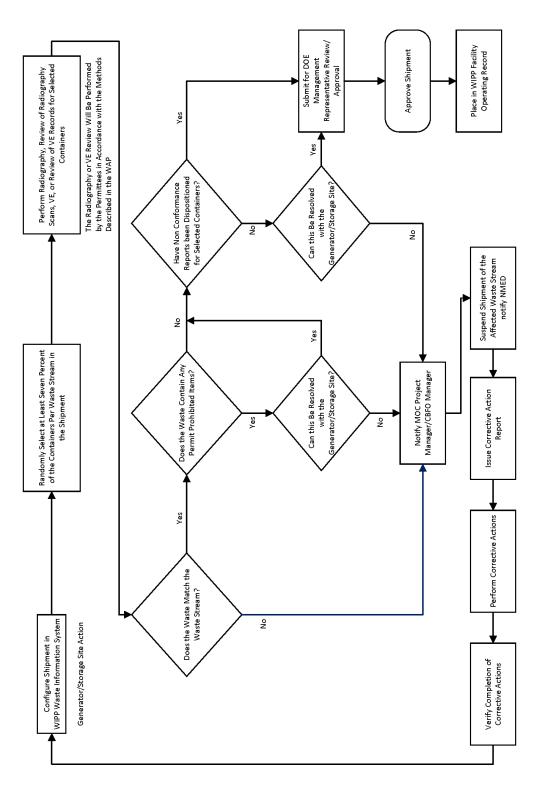


Figure C7-1 Overview of Waste Confirmation

ADDENDUM C1

DISPUTE RESOLUTION

1	ADDENDUM C1
2	DISPUTE RESOLUTION

3 <u>Applicability</u>

4 In the event the U.S. Department of Energy (DOE) disagrees, in whole or in part, with either an 5 action on a final audit report by the New Mexico Environment Department (NMED) (as specified in Permit Part 2, Section 2.3.2.4) or an evaluation by the NMED of the DOE's provisional 6 approval of an Acceptable Knowledge Sufficiency Determination Request (Determination 7 Request) for a particular waste stream (as specified in Renewal Application Attachment C, 8 Section C-0b), the DOE may seek dispute resolution. This dispute resolution procedure shall be 9 10 the exclusive mechanism for resolving disputes related to the NMED's final audit report action or a determination that the DOE's provisional approval of a Determination Request for a particular 11 waste stream is inadequate. 12

13 Notice to the NMED

14 To invoke dispute resolution, the DOE shall notify the NMED in writing within seven calendar days of receipt of the action or Determination Request in dispute. Such notice shall be sent to 15 the Hazardous Waste Bureau Chief and must set forth the specific matters in dispute, the 16 position the DOE asserts should be adopted, a detailed explanation for the DOE's position, and 17 any other matters considered necessary for the dispute resolution. For Determination Request 18 disputes, the DOE shall also submit factual data, analysis, opinion, and other documentation 19 upon which they relied for their provisional approval, and any other information that supports 20 their position. The NMED shall acknowledge receipt of notification by e-mail sent to the DOE's 21 representative as designated in their written notification. 22

23 <u>Tier I - Informal Negotiations</u>

24 The DOE and the NMED shall make reasonable, good faith efforts to informally resolve disputes 25 related to the NMED's determination. The DOE and the NMED shall meet or teleconference within 15 calendar days from the NMED's receipt of notice to commence negotiations to resolve 26 the dispute. The DOE and the NMED shall have 30 calendar days from the NMED's receipt of 27 notice to resolve the dispute. If an agreement is reached, the NMED shall promptly inform the 28 DOE of the terms of the agreement in writing. The DOE shall comply with the terms of such 29 agreement or, if appropriate, submit a revised submittal and implement the same in accordance 30 with such agreement. If an agreement is not reached, the NMED shall promptly inform the DOE 31 32 in writing that an agreement has not been reached.

33 <u>Tier II - Final Decision of the Secretary</u>

In the event agreement is not reached within the 30-calendar day period, the DOE may submit a
 written Request for Final Decision to the Secretary. The Request must be submitted within
 seven calendar days after receipt of notification from the NMED that an agreement under Tier I
 was not reached. The Secretary will notify the Permittees in writing of the decision on the
 dispute, and the Permittees shall comply with the terms and conditions of the decision. Such
 decision shall be the final resolution of the dispute and shall be enforceable under this Permit.

1 Actions Not Affected by the Dispute

With the exception of those matters under dispute, the Permittees shall proceed to take any
action required by those portions of the submission and of this Permit that the NMED
determines are not affected by the dispute.

5 <u>E-Mail Notifications</u>

For each of the following, the Permittees shall post a link to the notice, letter, request, or notice
of final action on the WIPP Home Page and inform those on the e-mail notification list as
specified in Permit Part 1, Section 1.11:

- If the DOE submits a notice to the NMED pursuant to Permit Part 1, Section 1.16.2.
- After receipt of the NMED's letter concerning the conclusion of any Tier I negotiations.
- If the DOE submits a Tier II request for final decision to the Secretary.
- After receiving notice of the final action by the Secretary.

ATTACHMENT D

RCRA CONTINGENCY PLAN

ATTACHMENT D

RCRA CONTINGENCY PLAN

TABLE OF CONTENTS

Introdu	iction			3
D-1	Scope	and Appli	cability	3
D-2	Emerg D-2a D-2b	Emergen	ponse Personnel and Training cy Response Personnel cy Response Training	5
D-3	Criteria	a for Imple	ementation of the RCRA Contingency Plan	7
D-4	Emerg D-4a	Immediat D-4a(1)	ponse Method te Notifications Initial Emergency Response and Alerting the RCRA Emergency Coordinator	9 10
	D-4b	Identifica	Communication of Emergency Conditions to Facility Employees tion of Released Materials and Assessment of the Extent of the icy	
	D-4c D-4d D-4e D-4f	Assessm Post-Ass Control a D-4e(1) D-4e(2) D-4e(2) D-4e(3) D-4e(4) Post-Eme D-4f(1) D-4f(2)	ergency Activities. Management and Disposition of Released Material Incompatible Waste Cleaning and Restoration of Equipment	12 13 14 16 17 17 17 18 20 20 21
D-5	Requir	ed Report	ling	21
D-6	Emerg	ency Equi	ipment	22
D-7	Emerg	gency Res	sponse Agreements	22
D-8	Evacua D-8a D-8b D-8c D-8d D-8e	Surface E Undergro Plan for S Plan for U	Evacuation On-site Assembly and Off-site Staging Areas ound Assembly Areas and Egress Hoist Stations Surface Evacuation Jnderground Evacuation Site Evacuation	23 24 24 25
D-9	Locatio	on of the F	RCRA Contingency Plan and Plan Revision	25

LIST OF TABLES

Table

Title

Table D-1	Resource Conservation and Recovery Act Emergency Coordinators
Table D-2	Emergency Equipment Maintained at the Waste Isolation Pilot Plant

LIST OF FIGURES

Figure

Title

Figure D-1a Figure D-1a-NFB Figure D-2 Figure D-3 Figure D-3 Figure D-4 Figure D-4 Figure D-4 Figure D-6 Figure D-6 Figure D-6-NFB Figure D-6-NFB Figure D-5 Figure D-6 Figure D-6 Figure D-7 Figure D-7	WIPP On-Site Assembly Areas and Off-Site Staging Areas WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416 RH Bay Evacuation Routes RH Bay Hot Cell Evacuation Route Evacuation Routes in the Waste Handling Building Designated Underground Assembly Areas
Figure D-7	WIPP Site Evacuation Routes

1		ATTACHMENT D
2		RCRA CONTINGENCY PLAN
3	Introduction	

4 This attachment contains the RCRA Contingency Plan prepared in accordance with the

5 Resource Conservation and Recovery Act (RCRA) requirements codified in 20.4.1.300 New

6 Mexico Administrative Code (**NMAC**) (incorporating Title 40 of the Code of Federal Regulations

7 (CFR) Part 262, Subpart M) and 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart D),

8 "Contingency Plan and Emergency Procedures." The purpose of this document is to define

9 responsibilities and to describe the coordination of activities necessary to minimize hazards to

human health and the environment from fires, explosions, or any sudden or non-sudden release
 of hazardous waste, or hazardous waste constituents to air, soil, or surface water in accordance

of hazardous waste, or hazardous waste constituents to air, soil, or surface water in with 20.4.1.300 NMAC (incorporating 40 CFR §262.260(a)) and 20.4.1.500 NMAC

(incorporating 40 CFR §264.51-(a)). This plan consists of descriptions of emergency responses

specific to contact-handled (**CH**) and remote-handled (**RH**) transuranic (**TRU**) mixed waste and

site-generated hazardous waste handled at the WIPP facility.

Pursuant to 20.4.1.300 NMAC (incorporating 40 CFR §262.262(b)), the Permittees ensure that

a copy of the Quick Reference Guide to the WIPP Facility RCRA Contingency Plan is

maintained on file at the facility and is available to the emergency response organizations listed

in Section D-2a, *Emergency Response Personnel*, and Section D-9, *Location of the RCRA*

20 Contingency Plan and Plan Revision. Whenever the RCRA Contingency Plan is revised, the

Permittees will update, if necessary, the quick reference guide and redistribute it in accordance

with 20.4.1.300 NMAC (incorporating 40 CFR §262.262(c)).

23 D-1 Scope and Applicability

24 The regulated units at the WIPP facility subject to this permit include the hazardous waste

management units (HWMUs) including the Waste Handling Building (WHB) Container Storage

26 Unit (i.e., WHB Unit) and the Parking Area Container Storage Unit (i.e., Parking Area Unit),

and the hazardous waste disposal units (**HWDUs**) in the underground disposal panels.

Pursuant to 20.4.1.500 NMAC (incorporating 40 CFR §264.51(a)), owners/operators of 28 treatment, storage, and disposal facilities are required to have formal contingency plans in place 29 that describe actions that facility personnel will take in response to any fire, explosion, or 30 release of hazardous waste or hazardous waste constituents which could threaten human 31 health or the environment. The contingency plan must meet the requirements of NMAC 32 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart D). The provisions of the RCRA 33 Contingency Plan apply to HWDUs in the underground waste disposal panels, HWMUs in the 34 WHB Unit and the Parking Area Unit, the Waste Shaft, and supporting TRU mixed waste 35 handling areas. These areas are shown in Figures D-1 through D-3. 36

The WIPP facility is a large quantity generator of hazardous waste pursuant to 20.4.1.300

NMAC (incorporating 40 CFR Part 262, "Standards Applicable to Generators of Hazardous

Waste"). 20.4.1.300 NMAC (incorporating 40 CFR §262.261(a)) requires that a contingency

plan be in place that describes actions that facility personnel will take in response to any fire,

explosion, or release of hazardous waste or hazardous waste constituents which could threaten

1 human health or the environment. The provisions of the this RCRA Contingency Plan also apply

2 to the site-generated hazardous waste accumulation areas (both the central accumulation areas

3 (CAAs), also referred to as the less-than-90-day areas, and satellite accumulation areas

4 (SAAs)), the locations of which are specified in the Quick Reference Guide to the WIPP Facility

5 RCRA Contingency Plan. For the remainder of this document, the term "site-generated

6 hazardous waste" will mean waste accumulated in both the CAAs and SAAs.

7 Wastes may also be generated at the WIPP facility as a direct result of managing the TRU and

8 TRU mixed wastes received from the off-site generators. Throughout the remainder of this plan,

9 this waste is referred to as "derived waste." Derived waste will be <u>managed as TRU mixed</u>

¹⁰ <u>waste and em</u>placed in the rooms in HWDUs along with the TRU mixed waste for disposal.

- Every reasonable effort to minimize the amount of derived waste, while providing for the health and safety of personnel, will be made.
- Wastes generated as a result of emergency response actions will be categorized into one of three groups and disposed of accordingly. These are: 1) nonhazardous wastes to be disposed of at an appropriate disposal facility (e.g., low-level waste facility or approved landfill), 2) hazardous nonradioactive wastes (site-generated hazardous waste) to be disposed of at an offsite RCRA permitted facility, and 3) derived waste to be disposed of in the underground HWDUs as TRU mixed waste. Hazardous liquid wastes that may be generated as a result of emergency response actions will be managed as follows:
- Non-Mixed Accumulated liquids contaminated only with hazardous constituents
 will be placed into containers and managed in accordance with 20.4.1.300 NMAC
 (incorporating 40 CFR §262.17) requirements. The waste will be shipped to an
 approved off-site treatment, storage, or disposal facility.
- Mixed Accumulated liquids contaminated with TRU mixed waste will be solidified and the solidified materials will be disposed of in the underground WIPP repository as TRU mixed waste.

27 Waste containing liquid in excess of treatment, storage, or disposal facility Waste Acceptance

28 Criteria (TSDF-WAC) limits shall not be emplaced in the underground HWDUs (See Permit

29 Attachment C, Section C-1c).

Off-site waste managed and disposed of at the WIPP facility is radioactive mixed waste, and as 30 a result, response to emergencies must consider the dual hazard associated with this waste. In 31 responding to emergencies involving TRU mixed waste, the actions necessary to protect human 32 health and the environment from the effects of radioactivity may be similar to those actions 33 necessary to provide protection from hazardous waste and hazardous waste constituents. Such 34 responses may require the use of equipment and processes specific to events resulting in 35 radiological contamination (e.g., continuous air monitors, decontamination shower equipment, 36 HEPA vacuums, paint/fixatives) and are not included in the RCRA Contingency Plan. 37 Furthermore, the RCRA Contingency Plan may require additional actions to be taken to mitigate 38 the hazards associated with the hazardous component of the waste. These measures are not 39 intended to replace actions required to protect human health and the environment in response 40 to radiological emergencies. In this manner, the RCRA Contingency Plan complements the 41

42 radiological response activities.

D-2 Emergency Response Personnel and Training 1

D-2a Emergency Response Personnel 2

3

4

39

a week, with the responsibility for coordinating emergency response measures. In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.261(d)) and 20.4.1.500 NMAC 5 (incorporating 40 CFR §264.52(d)), gualified RCRA Emergency Coordinators are listed in Table 6 D-1 and are trained to the requirements found in Permit Attachment F, Table F-2, under 7 "Emergency Coordinator."-8 In addition, personsPersons qualified to act as the RCRA Emergency Coordinator have the 9 authority to commit the necessary resources to implement this RCRA Contingency Plan. 10 During emergencies, the RCRA Emergency Coordinator has three primary responsibilities: 11 Assess the Situation—The RCRA Emergency Coordinator shall gather information • 12 relevant to the incident, such as the type of event, quantity and type of released 13 waste, and existing or potential hazards to human health and the environment. 14 Protect Personnel—The RCRA Emergency Coordinator shall take reasonable • 15 measures to ensure the safety of personnel, such as ensuring that alarms have 16 been activated, personnel have been accounted for, any injuries have been 17 attended to, and evacuation of personnel has occurred, if necessary. 18 Contain the Release—The RCRA Emergency Coordinator shall take reasonable 19 measures to ensure that fires, explosions, or releases of hazardous waste or 20 hazardous waste constituents do not occur, recur, or spread. 21 In addition to the RCRA Emergency Coordinator, the following individuals, groups, and 22 organizations have specified-responsibilities during anya WIPP facility emergency, which may 23 include the following: 24 WIPP Fire Department—The primary providers of fire suppression, technical 25 • rescue, Emergency Medical Services (EMS), and hazardous materials response 26 for the protection of personnel in both surface and underground facilities. 27 Facility Shift Manager (FSM)—A member of the Facility Operations organization 28 • who is in charge of plant operations and is the senior shift representative 29 responsible for maintaining the facility in a safe configuration during normal and 30 abnormal conditions. The FSM can concurrently serve as the RCRA Emergency 31 Coordinator, if trained to the requirements of Permit Attachment F (Facility 32 Personnel Permit Training Program), or provide support to the qualified RCRA 33 Emergency Coordinator on shift. 34 Central Monitoring Room Operator (CMRO)—An on-shift operator responsible for 35 Central Monitoring Room (CMR) operations, including coordination of facility 36 communications. The CMRO documents these activities (e.g., communications, 37 notifications) in a facility log. The CMRO is a member of Facility Operations, and 38

during emergencies, the CMRO supports the RCRA Emergency Coordinator.

A RCRA Emergency Coordinator will be on-site at the WIPP facility 24 hours a day, seven days

1	 <u>Emergency Response Team (ERT)</u> — WIPP facility personnel who serve as an
2	Industrial Fire Brigade and are trained to respond to surface and underground
3	emergencies on site, including fires, medical emergencies, and releases of
4	hazardous materials. The ERT members supplement WIPP Fire Department
5	response capabilities. The ERT member assigned to the underground will not
6	perform any coordinated firefighting underground and will only respond to incipient-
7	stage fires that threaten TRU mixed waste, if is it safe to do so.
8	 <u>Firefighter</u>—A WIPP Fire Department member who serves as a primary responder
9	to surface and underground emergencies, including fires, medical emergencies,
10	and releases of hazardous materials. Firefighters assigned to the underground will
11	not perform any coordinated firefighting underground and will only respond to
12	incipient-stage fires that threaten TRU mixed waste, if is it safe to do so.
13 14 15 16 17 18 19 20	• <u>Fire Department Incident Commander</u> —Upon delegation by the RCRA Emergency Coordinator, and once incident command has been established, the Incident Commander is responsible for direction and supervision of emergency responders during an incident resulting in implementation of the <i>RCRA Contingency Plan</i> . The Incident Commander will be a member of the WIPP Fire Department. For security-related incidents that invoke implementation of the <i>RCRA Contingency Plan</i> , the Fire Department Incident Commander will establish a unified command with the WIPP Protective Force.
21	 <u>Mine Rescue Team (MRT)</u>— The MRT emergency response capabilities include
22	search, rescue, reentry, and recovery operations. The MRT responds in
23	accordance with the requirements of 30 CFR Part 49. The MRT emergency
24	response actions include extinguishing incipient stage fires, if encountered, and
25	immediately reporting uncontrolled fires.
26 27 28 29 30 31	• <u>Emergency Operations Center (EOC) Staff-</u> Upon activation, the EOC supports the RCRA Emergency Coordinator and Incident Commander with emergency management decision-making and associated notifications. Since EOC staff performs duties similar to their normal job functions during an emergency response and provides support related to their area(s) of expertise, no specific RCRA training is required.
32	D-2b Emergency Response Training

33 The WIPP Fire Department personnel are trained in accordance with the WIPP Fire Department

Training Plan, which is kept on file at the WIPP facility. The training plan incorporates current

National Fire Protection Association (NFPA) standards for training Firefighters and ERT
 members.

³⁷ Fire Department Incident Commanders are also trained in accordance with the *WIPP Fire*

38 Department Training Plan, which incorporates the Federal Emergency Management Agency

39 (FEMA), Incident Command System (ICS), and the National Incident Management System

40 (NIMS) standards.

- 1 WIPP personnel who perform EMS duties are licensed through the State of New Mexico
- 2 Emergency Medical Systems Bureau. Licensure requirements for training, continuing education,
- and skills maintenance are set forth through state requirements. Licenses are maintained by
- 4 attending training seminars or conferences.
- 5 As described above, emergency response training is conducted in accordance with the *WIPP*
- 6 Fire Department Training Plan, which is updated whenever the applicable standards are
- 7 revised. In addition to the emergency response training, WIPP Fire Department personnel are
- 8 required to complete applicable site-specific training, which is described in Permit Attachment F,
- 9 Facility Personnel Permit Training Program.
- 10 <u>D-3</u> Criteria for Implementation of the RCRA Contingency Plan
- 11 The provisions of the *RCRA Contingency Plan* shall be implemented immediately whenever 12 there is a fire, an explosion, or a release of hazardous wastes or hazardous waste constituents 13 that could threaten human health or the environment, or whenever the potential for such an
- event exists as determined by the RCRA Emergency Coordinator, as required under 20.4.1.300
- 15 NMAC (incorporating 40 CFR §262.260(b)) and 20.4.1.500 NMAC (incorporating 40 CFR
- 16 §264.51(b)).
- 17 There may be situations which that do not readily lend themselves to an immediate assessment
- of the possible hazards to human health and the environment. In these cases, the RCRA
- 19 Emergency Coordinator will implement the *RCRA Contingency Plan* as a precautionary
- 20 measure, regardless of the emergency situation or occurrence, if the RCRA Emergency
- 21 Coordinator has reason to believe that a fire, explosion, or release of hazardous waste or
- hazardous waste constituents has occurred that could threaten human health or the
- environment.
- In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.265(i)) and 20.4.1.500 NMAC
- 25 (incorporating 40 CFR §264.56(i)), the RCRA Emergency Coordinator, on behalf of the
- 26 Permittees, will record the time, date, and details of the incident that required implementation of
- the RCRA Contingency Plan. The Secretary of the NMED will be immediately notified by the
- 28 Permittees. Additionally, the Permittees shall submit a written report to the NMED within 15
- days of the incident, as specified in Section D-5. The following emergency situations, as they
- ³⁰ pertain to TRU mixed waste and generated hazardous wastes, warrant immediate
- implementation of the *RCRA Contingency Plan* by the RCRA Emergency Coordinator in
- accordance with standard operating procedures on file at the WIPP facility:
- 33 Fires
- If a fire involving TRU mixed waste or site-generated hazardous waste occurs
- If a fire (e.g., building, grass, nonhazardous waste fire) occurs within or near a CAA or
 SAA that threatens to involve site-generated hazardous waste
- If a fire (e.g., building, grass, nonhazardous waste fire) occurs within or near the
 permitted HWMUs that threatens to involve TRU mixed waste
- If a fire occurs in <u>the</u> underground that results in immediate personnel evacuation or
 prevents normal personnel access to the underground

- For any fire which that does not meet the above criteria, the RCRA Emergency Coordinator shall document the rationale for not implementing the *RCRA Contingency Plan* (e.g., there is no threat to human health or the environment).
- 4 Explosions
- 5 If an explosion involving TRU mixed waste or site-generated hazardous waste occurs
- If an explosion occurs within or near a CAA or SAA which that threatens to involve site generated hazardous waste
- If an explosion occurs within or near the permitted HWMUs which that threatens to
 involve TRU mixed waste
- If an explosion occurs in the underground that results in immediate personnel evacuation
 or prevents normal personnel access to the underground
- If there is an imminent danger of an explosion occurring (e.g., gas leak with an ignition source nearby) which could involve TRU mixed or site-generated hazardous waste
- For any explosion which that does not meet the above criteria, the RCRA Emergency
 Coordinator shall document the rationale for not implementing the *RCRA Contingency Plan* (e.g., there is no threat to human health or the environment).
- 17 Unplanned Sudden/Non-Sudden Releases
- If, prior to waste emplacement, one or more containers of TRU mixed waste has spilled
 or been breached due to dropping, puncturing, container failure or degradation, or any
 other physical or chemical means, resulting in a release
- If, after waste emplacement, one or more containers of TRU mixed waste in an active
 room has been breached
- If a continuous air monitor confirms a release of radioactive particulates to the ambient
 atmosphere, indicating a possible release of TRU mixed waste constituents from the
 permitted facility
- If a spill of site-generated hazardous waste occurs in a CAA or SAA and cannot be
 contained with secondary containment methods or absorbents, thereby threatening a
 release to air, soil, or surface water
- If a site-generated hazardous waste spill occurs in a CAA or SAA and results in the
 release of potentially flammable material, thereby threatening to create a fire or
 explosion hazard
- If a site-generated hazardous waste spill occurs in a CAA or SAA and results in the
 release of potentially toxic fumes that would-could threaten human health
- For any release of hazardous waste or hazardous waste constituents that does not meet the above criteria, the RCRA Emergency Coordinator shall document the rationale for not

- implementing the RCRA Contingency Plan (e.g., there is no threat to human health or the 1 2 environment).
- Other Occurrences 3
- If a natural phenomenon (e.g., earthquake, flood, lightning strike, tornado) occurs that 4 involves TRU mixed waste or site-generated hazardous waste or threatens to involve 5 TRU mixed waste or site-generated hazardous waste 6
- If an underground structural integrity emergency (e.g., roof fall in an active room) occurs 7 that involves TRU mixed waste or site-generated hazardous waste, threatens to involve 8 TRU mixed waste or site-generated hazardous waste, results in immediate personnel 9 evacuation, or prevents normal personnel access to the underground 10

For any natural phenomenon or underground structural emergency that does not meet the 11 above criteria, the RCRA Emergency Coordinator shall document the rationale for not 12 implementing the RCRA Contingency Plan (e.g., there is no threat to human health or the 13 environment). 14

D-4 Emergency Response Method 15

Methods that describe implementation of the RCRA Contingency Plan cover the following six 16 17 areas:

- 1. Immediate Notifications (Section D-4a) 18 19 2. Identification of Released Materials and Assessment of Extent of the Emergency 20 (Section D-4b) 21 22 3. Assessment of the Potential Hazards (Section D-4c) 23 24 4. Post-Assessment Notifications (Section D-4d) 25 26 27 5. Control and Containment of the Emergency (Section D-4e) 28
- 6. Post-Emergency Activities (Section D-4f) 29
- 30

D-4a Immediate Notifications 31

- Notification requirements in the event of implementation of the RCRA Contingency Plan are 32
- defined by 20.4.1.300 NMAC (incorporating 40 CFR §262.265(a)) and 20.4.1.500 NMAC 33
- (incorporating 40 CFR §§264.56(a)). Personnel at the WIPP facility are trained to respond to 34
- emergency notifications. 35
- Whenever an emergency situation occurs that warrants implementation of this RCRA 36
- Contingency Plan, as described in Section D-3, the Permittees will immediately notify the 37 Secretary of the NMED. 38

1 D-4a(1) Initial Emergency Response and Alerting the RCRA Emergency Coordinator

2 The first person to become aware of an incident shall immediately report the situation to the

3 CMRO and, as requested by the CMRO, provide the relevant information. Facility personnel are

trained in the process for notifying the CMRO as part of General Employee Training (**GET**).

5 In addition to receiving incident reports from facility personnel, the CMRO continuously-monitors

6 (24 hours a day) the status of alarms 24 hours a day, takes telephone calls and radio

7 messages, initiates calls to emergency staff, and initiates emergency response procedures

8 regarding evacuation, if needed.

9 Once the CMRO is notified of a fire, explosion, or a release anywhere in the facility (either by

eyewitness notification or an alarm), the RCRA Emergency Coordinator is immediately notified.

11 The RCRA Emergency Coordinator ensures that the emergency responders, including the

12 WIPP Fire Department, the ERT, and the MRT, have been notified, as needed. Once incident

command has been established, the RCRA Emergency Coordinator has the authority to

delegate the responsibilities for mitigation of the incident to the Incident Commander.

15 The response to an unplanned event will be performed in accordance with standard operating

procedures and guides based on the applicable Federal federal, Statestate, or local regulations

and/or guidelines for that response. These include DOE Order 151.1C, Comprehensive

18 Emergency Management System; the U.S. Mine Safety and Health Administration (MSHA); the

19 NMAC; <u>the Comprehensive Environmental Response</u>, Compensation, and Liability Act;

20 Chapter 74, Article 4B, New Mexico Statutes Annotated 1978; and the New Mexico Emergency

21 Management Act.

If needed, the RCRA Emergency Coordinator will immediately notify the appropriate federal,

state, and local agencies and mining companies in the vicinity of the WIPP facility, listed in

24 Section D-7, with designated response roles.

Depending on the emergency, the EOC may be activated for additional support. In the event

that the EOC is activated, decision-making responsibilities related to emergency management

and associated notifications may be delegated to the EOC by the RCRA Emergency

28 Coordinator. The EOC will assist in the mitigation of the incident with the use of appropriate

29 communications equipment and technical expertise from available resources. During the

³⁰ emergency, the RCRA Emergency Coordinator will remain in contact with and advise the EOC

of the known hazards.

32 The EOC staff assesses opportunities for coordination and the use of mutual-aid agreements

33 with local agencies making additional emergency personnel and equipment available (Section

D-7), as well as the use of specialized response teams available through various Statestate and

³⁵ Federal<u>federal</u> agencies. Because the WIPP facility is a DOE-owned facility, the Permittees may

also use the resources available from the *National Response Framework*.

1 <u>D-4a(2)</u> Communication of Emergency Conditions to Facility Employees

- 2 Procedures for immediately notifying facility personnel of emergencies are as follows:
- Local Fire Alarms
- The local fire alarms sound an audible tone and may be activated automatically or manually in the event of a fire.
- Surface Evacuation Signal
- The evacuation signal is a yelp tone and is manually activated by the CMRO when
 needed. The CMRO follows the evacuation signal with verbal instructions and ensures
 the Site Notification System has been activated.
- Underground Evacuation Warning System

11 The underground evacuation signal is a yelp tone and flashing strobe light. In the 12 event of an evacuation signal, underground personnel will follow escape routes to 13 egress hoist stations. Underground personnel are trained to report to the underground 14 assembly areas and await further instruction if all-power fails or if ventilation stops. If 15 evacuation of underground personnel is required <u>due to a power failure</u>, this will be 16 done using the <u>a</u> backup generators is available to power the hoisting equipment. 17 <u>Evacuation will be</u>and in accordance with the applicable requirements of MSHA.

WIPP facility personnel are trained and given instruction during GET to recognize the various
 alarm signals and the significance of each alarm. WIPP facility employees and site visitors are
 required to comply with directions from emergency personnel and alarm system notifications
 and to follow instructions concerning emergency equipment, shutdown procedures, and
 emergency evacuation routes and exits.

23

24 D-4b Identification of Released Materials and Assessment of the Extent of the Emergency

The identification of hazardous wastes or hazardous waste constituents involved in a fire, an 25 explosion, or a release to the environment is a necessary part of the RCRA Emergency 26 Coordinator's assessment of an incident, as described in 20.4.1.300 NMAC (incorporating 40 27 CFR §262.265(b)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(b)). Immediately after 28 alarms have been activated and required notifications have been made, the RCRA Emergency 29 Coordinator shall direct an investigation to determine pertinent information relevant to the actual 30 or potential threat posed to human health or the environment. The information will include the 31 character, exact source, amount, and areal extent of any released material. This may be done 32 by observation or review of facility records or manifests and, if necessary, by chemical analysis. 33

The identification of the character and source of released materials at any location is enhanced because hazardous wastes are stored, managed, or disposed at specified locations throughout

36 the WIPP facility.

Sources of information available to identify the hazardous wastes involved in a fire, an 1 2 explosion, or a release at the WIPP facility include operator/supervisor knowledge of their work areas, materials used, and work activities underway; the WIPP Waste Information System 3 (WWIS), which identifies the location within the facility of emplaced TRU mixed waste, including 4 emplaced derived waste; and waste manifests and other waste characterization information in 5 the operating record Operating Record. The WWIS also includes information on wastes that are 6 in the waste handling process. Also available are Safety Data Sheets (SDSs) for hazardous 7 materials in the various user areas throughout the facility, waste acceptance records, and 8 materials inventories for buildings and operating groups at the WIPP facility. Information or data 9 from the derived waste accumulation areas, the site-generated hazardous waste accumulation 10 areas, and nonregulated waste accumulation areas are included. It is anticipated that this 11 information is sufficient for identifying the nature and extent of the released materials. The 12 RCRA Emergency Coordinator has access to this information when needed. 13

The waste received at the WIPP facility must meet <u>the</u> TSDF-WAC (e.g., no more than one percent liquid), which minimizes the possibility of waste container degradation and liquid spills. Should a spill or release occur from a container of site-generated hazardous or TRU mixed waste, following an initial assessment of the event, the RCRA Emergency Coordinator will ensure that the following actions are immediately taken, consistent with radiological control procedures, in compliance with 20.4.1.300 NMAC (incorporating 40 CFR §262.261(a)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.52(a) and §264.171):

- Assemble the required response equipment, such as protective clothing and gear, heavy equipment, empty drums, overpack drums, hand tools, and absorbent materials
- Transfer the released material to a container that is in good condition and patch or overpack the leaking container into another container that is in good condition
- Once the release has been contained, determine the areal extent of the release and
 proceed with appropriate cleanup action, such as chemical neutralization, vacuuming, or
 excavation
- 28 D-4c Assessment of the Potential Hazards
- Concurrent with the actions described in Sections D-4a and D-4b, and in accordance with 29 20.4.1.300 NMAC (incorporating 40 CFR §262.265(c)) and 20.4.1.500 NMAC (incorporating 40 30 CFR §264.56(c)), the RCRA Emergency Coordinator shall assess possible hazards to human 31 health or the environment that may result from the release, fire, or explosion. This assessment 32 will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of 33 any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous 34 surface water run-off from water or chemical agents used to control fire and heat-induced 35 explosions). The RCRA Emergency Coordinator will be responsible for identifying and 36 responding to immediate and potential hazards, using the services of trained personnel. 37
- After the materials involved in an emergency are identified, the specific information (e.g., associated hazards, appropriate personal protective equipment (**PPE**), decontamination) may be obtained from SDSs and from appropriate chemical reference materials at the same location.
- These information sources are available to the RCRA Emergency Coordinator or may be
- accessed through several WIPP facility organizations.

1 If, upon completion of the hazards assessment, the RCRA Emergency Coordinator determines

that there are no actual or potential hazards to human health or the environment present, this

3 RCRA Contingency Plan may be terminated. The RCRA Emergency Coordinator will record the

4 time, date, and details of the incident in the operating record Operating Record, and the

5 Permittees will ensure that the reporting requirements of Section D-5 are fulfilled.

6 D-4d Post-Assessment Notifications

Upon RCRA Contingency Plan implementation, post-assessment notifications may be 7 necessary in order to satisfy 20.4.1.300 NMAC (incorporating 40 CFR §262.265(d)) and 8 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)). If it has been determined that the facility 9 has had a fire, an explosion, or a release of hazardous waste or hazardous waste constituents 10 that could threaten human health or the environment outside the facility (i.e., outside the Land 11 Withdrawal Boundary), the RCRA Emergency Coordinator, after consultation with the DOE as 12 the owner of the facility, will ensure that the appropriate local authorities are immediately notified 13 by telephone and/or radio in the event that evacuation is needed. The following notifications 14 satisfy the requirements of 20.4.1.300 NMAC (incorporating 40 CFR §262.265(d)(1)) and 15 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)(1)): 16

17	•	New Mexico Department of Homeland Security and Emergency Management (telephone
18		number: (505) 476-9635)
19		

- Eddy County via the Regional Emergency Dispatch Authority (telephone number: (575) 616-7155)
- 22 23

24

- Lea County via the Regional Emergency Dispatch Authority (telephone number: (575) 397-9265)
- The RCRA Emergency Coordinator must be available to help appropriate officials decide whether local areas should be evacuated.

After local authorities are notified, the RCRA Emergency Coordinator must immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center. For the purposes of the *RCRA Contingency Plan*, the following notifications satisfy the requirements of 20.4.1.300 NMAC (incorporating 40 CFR §262.265(d)(2)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)(2)):

32	•	New Mexico Environment Department (NMED)
33		Department of Public Safety
34		24-Hour Emergency Reporting Telephone Number: (505) 827-9329
35		FAX number: (505) 827-9368
36		
37	•	National Response Center
38		Telephone number: 1-800-424-8802

- ³⁹ FAX number: (202) 479-7181
- 40 This notification shall include the following information:
- The name and phone number of the reporter

- The name and address of the facility
- ² The type of incident (fire, explosion, or release)
- The date and time of the incident
- The name and quantity of material(s) involved, to the extent known
- 5 The extent of injuries, if any
- Possible hazards to human health and the environment (air, soil, water, wildlife, etc.)
 outside the facility

8 Communications beyond those required by the *RCRA Contingency Plan* are the responsibility of 9 the Permittees in accordance with plans and policies on file at the WIPP facility.

10 <u>D-4e Control and Containment of the Emergency</u>

The RCRA Emergency Coordinator is required to ensure control of an emergency and to 11 minimize the potential for the occurrence, recurrence, or spread of releases due to the 12 emergency situation, as described in 20.4.1.300 NMAC (incorporating 40 CFR §262.265(e) and 13 (f)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56-(e) and (f)). Standard operating 14 procedures and guides are used to implement initial response measures with priority being 15 control of the emergency, and those actions necessary to ensure confinement and containment 16 in the early, critical stages of a spill or leak. The RCRA Emergency Coordinator, in conjunction 17 with the Incident Commander, is responsible for implementing the following measures: 18

- Stopping processes and operations
- Collecting and containing released wastes and materials
- Removing or isolating containers of hazardous waste posing a threat
- Ensuring that wastes managed during an emergency are handled, stored, or treated with
 due consideration for compatibility with other wastes and materials on site and with
 containers utilized (Section D-4f(2))
- Restricting personnel not needed for response activities from the scene of the incident
- Evacuating the area
- Curtailing nonessential activities in the area
- Conducting preliminary inspections of adjacent facilities and equipment to assess damage
- Maintaining fire equipment on standby at the incident site in cases where ignitable
 liquids have been or may be released and ensuring that ignition sources are kept out of

the area. Ignitable liquids will be segregated, contained, confined, diluted, or otherwise
 controlled to preclude inadvertent explosion or detonation.

No operation that has been shut down in response to the incident will be restarted until
 authorized by the RCRA Emergency Coordinator. If a release occurs that involves radioactivity,
 the RCRA Emergency Coordinator actions will be consistent with radiation control policies and

6 practices.

The standard operating procedures for emergency response may include, but are not limited to,
 the following actions appropriate for control of releases:

- Isolating the area from unauthorized entry by fences, barricades, warning signs, or
 other security and site control precautions. Isolation and evacuation distances vary,
 depending upon the chemical/product, fire, and weather situations.
- 12 2. Establishing drainage controls.
- 13 3. Stabilizing physical controls (such as dikes or impoundment[s]).
- 14 4. Capping contaminated soils to reduce migration.
- Using chemicals and other materials to retard the spread of the release or to mitigate
 its effects.
- 6. Excavating, consolidating, or removing contaminated soils.
- 18 7. Removing wastes containers to reduce exposure risk during situations such as fires.

¹⁹ If the facility stops operations in response to a fire, explosion, or release, the RCRA Emergency

20 Coordinator shall ensure continued monitoring for leaks, pressure buildup, gas generation, or

ruptures in valves, pipes, or other equipment, wherever appropriate.

Natural and/or synthetic methods will be employed to limit the releases of hazardous- wastes or
 hazardous waste constituents so that effective recovery and treatment can be accomplished
 with minimal additional risk to human health or the environment.

- Emergency response actions taken to mitigate releases may include, but are not limited to, the following:
- Physical methods of control may involve any of several processes to reduce the area
 of the spill/leak, or other release mechanism (such as fire suppression).
- a. Absorption (e.g., absorbent sheets; spill control bucket materials specifically for
 solvents, neutralization, or acids/caustics; and absorbent socks for general liquids
 or oils)
- b. Dikes or Diversions (e.g., absorbent socks or earth)
- c. Overpacking

- d. Plug and Patch
 - e. Transfers from leaking container to new container f. Vapor Suppression (e.g., aqueous foam blanket)
- 4 2. Chemical methods of mitigation may include the following:
- 5 a. Neutralization
- 6 b. Solidification

Once the Incident Commander informs the RCRA Emergency Coordinator that the emergency
 scene is stable, the release has been stopped, any reactions have been controlled, the released
 hazardous materials have been contained within a localized area, and the area of contamination
 has been secured from unauthorized entry, the field emergency response activity can be
 terminated.

12 <u>D-4e(1) Fires</u>

2

3

In the event of a fire that involves or threatens TRU mixed waste or site-generated hazardous
 waste, emergency response actions may include, but are not limited to, the following:

- 15 **1.** The RCRA Emergency Coordinator will remain in contact with and advise the Incident 16 Commander of the known hazards.
- The Incident Commander will maintain overall control of the emergency and may
 accept and evaluate the advice of WIPP facility personnel and emergency response
 organization members, but retains overall responsibility until the emergency is
 terminated.
- 3. Only fire extinguishing materials that are compatible with the materials involved in the
 fire will be used to extinguish fires. Water and dry chemical materials in use at the
 <u>WIPP facility</u> have been determined to be compatible with all-components of the TRU
 mixed waste and site-generated hazardous waste.
- 4. In order to ensure that storm drains and/or sewers do not receive potentially
 hazardous runoff, dikes will be built around storm drains to control discharge as
 needed. Collected waste will be sampled and analyzed for hazardous constituents,
 and appropriately disposed.
- 5. The RCRA Emergency Coordinator will ensure that measures are taken to shut down
 operational units (e.g., process equipment and ventilation equipment) that have been
 affected directly or indirectly by the fire.
- Fire suppression materials used in response to incidents will be retained on-scene,
 where an evaluation will be performed to determine appropriate recovery and disposal
 methods.
- Upon underground evacuation due to a fire in the underground that involves or
 threatens to involve TRU mixed waste or site-generated hazardous waste, a response

plan will be developed depending on the status of the fire. The plan may include
 ventilation control, barrier erection, and/or waiting for the fire to self-extinguish or
 implement active ventilation.

4 <u>D-4e(2) Explosions</u>

In the event of an explosion that involves or threatens TRU mixed waste or site-generated
 hazardous waste, emergency response actions may include, but are not limited to, the following:

- The RCRA Emergency Coordinator will remain in contact with and advise the Incident
 Commander of the known hazards.
- The Incident Commander will maintain overall control of the emergency and may
 accept and evaluate the advice of WIPP facility personnel and emergency response
 organization members, but retains overall responsibility until the emergency is
 terminated.
- The RCRA Emergency Coordinator will ensure measures are taken to shut down
 operational units (e.g., process equipment and ventilation equipment) that have been
 affected directly or indirectly by the explosion.
- 16 4. If, following an explosion, there is an ensuing fire, see Section D-4e(1).
- If, following an explosion, there is an underground structural integrity emergency, see
 Section D-4e(4).
- 19 <u>D-4e(3)</u> <u>Unplanned Sudden/Non-Sudden Releases</u>
- 20 Spills of Site-Generated Hazardous Waste

If a spill of site-generated hazardous waste has occurred, and 1) the spill cannot be contained
 with secondary containment methods or absorbents, 2) the spill causes a release of flammable
 material, or 3) the spill results in toxic fumes, the RCRA Emergency Coordinator will ensure
 implementation of measures that may include, but are not limited to, the following actions:

- The RCRA Emergency Coordinator will remain in contact with and advise the Incident
 Commander of the known hazards.
- The Incident Commander will maintain overall control of the emergency and may
 accept and evaluate the advice of WIPP facility personnel and emergency response
 organization members, but retains overall responsibility until the emergency is
 terminated.
- 31 3. The immediate area will be evacuated.
- 4. The source of the release will be mitigated, if possible.
- 5. A dike to contain runoff will be built, if necessary.

- Dikes around storm drains to control discharge will be built, as needed, to ensure that storm drains and/or sewers do not receive potentially hazardous runoff.
- Fire equipment will be maintained on standby at the incident site in cases where
 ignitable liquids have been or may be released, and ignition sources will be kept out of
 the area of ignitable liquids.
- 8. Released waste and contaminated media will be collected and placed into drums or
 other appropriate containers.
- 8 Releases of TRU Mixed Waste

1 2

If a release of TRU mixed waste has occurred, the emergency will be managed as a potential
 radiological release, and radiological control measures will determine the activities that can be
 performed safely, which may include the following:

- 12 **1.** The RCRA Emergency Coordinator will remain in contact with and advise the Incident 13 Commander of the known hazards.
- The Incident Commander will maintain overall control of the emergency and may
 accept and evaluate the advice of WIPP facility personnel and emergency response
 organization members, but retains overall responsibility until the emergency is
 terminated.
- Prior to the re-entry following an event involving containers that are managed as TRU
 mixed waste, a Radiological Work Permit (**RWP**) will be prepared.
- During the re-entry phase, the extent of radiological contamination will be determined.
 This information is used by the RCRA Emergency Coordinator to determine an appropriate course of action to recover the area.
- 5. During the recovery phase, the necessary resources to conduct decontamination
 and/or overpacking operations will be used as needed.
- Prior to returning the affected area and/or equipment to normal activities, the RCRA
 Emergency Coordinator will determine if additional measures are required by the
 RCRA Contingency Plan (e.g., characterization and disposal of contaminated media).
- 7. The recovery phase will include activities (e.g., placing the waste material in another container, vacuuming the waste material, overpacking or plugging/patching the affected waste container(s), decontaminating or covering the affected area), as specified in the RWP, to minimize the spread of contamination to other areas.
- The RWPs and other administrative controls will provide protective measures to help
 ensure that new hazardous constituents will not be added during decontamination
 activities.
- 35 <u>D-4e(4)</u> Other Occurrences
- 36 Natural Phenomena

In the event of a natural phenomenon (e.g., earthquake, flood, lightning strike, tornado) that 1 2 involves hazardous waste or has threatened to cause a release of hazardous waste or hazardous waste constituents, emergency response actions may include, but are not limited to, 3 the following: 4 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident 5 Commander of the known hazards. 6 2. The Incident Commander will maintain overall control of the emergency and may 7 accept and evaluate the advice of WIPP facility personnel and emergency response 8 organization members- but retains overall responsibility until the emergency is 9 terminated. 10 3. Containers which that have not been disposed will be inspected for signs of leakage or 11 damage, and containment systems will be inspected for deterioration. 12 4. Affected equipment or areas associated with hazardous waste management activities 13 will be inspected, and the operability of monitoring systems will be ensured. 14 5. Affected electrical equipment and lines will be inspected for damage. 15 6. Affected buildings and fencing directly related to hazardous waste management 16 activities will be inspected for damage. 17 7. A general survey of the site will be conducted to check for signs of physical damage. 18 8. The RCRA Emergency Coordinator will ensure that measures are taken to shut down 19 operational units (e.g., process equipment and ventilation equipment) that have been 20 affected by the natural phenomenon. 21 Underground Structural Integrity Emergencies 22 In the event of an underground structural integrity emergency that involves or threatens TRU 23 mixed waste (i.e., occurs in an active disposal room) or site-generated hazardous waste, the 24 emergency will be managed as a potential radiological release, and radiological control 25 measures will determine the activities that can be performed safely, and may include the 26 following: 27 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident 28 Commander of the known hazards. 29 2. The Incident Commander will maintain overall control of the emergency and may 30 accept and evaluate the advice of WIPP facility personnel and emergency response 31 organization members, but retains overall responsibility until the emergency is 32 terminated. 33 3. The RCRA Emergency Coordinator will ascertain whether the roof conditions allow for 34 safe entry and if the waste container or containers in question are accessible. 35

1 2 3 4	4.	The RCRA Emergency Coordinator may recommend closing the entire panel, or the affected room of waste containers, based on the location of the event and the stability of the roof and walls in the panel as a method to ensure that measures are taken to shut down affected operational units.
5 6	5.	Access to the ventilation flow path downstream of the incident will be restricted, as appropriate.
7 8	6.	Ventilation to the affected room will be restricted to ensure that there is no spread of contamination that may have been released, as appropriate.
9	7.	Accessible containers will be inspected for signs of leakage or damage.
10 11	8.	The spill area will be covered with material (e.g., plastic, fabric sheets) in a manner that safely isolates the contamination in the area.
12	q	The RCRA Emergency Coordinator will determine if the covered spill area safely

The RCRA Emergency Coordinator will determine if the covered spill area safely
 allows for continued waste disposal operations or whether further action is required to
 reinitiate operations.

15 D-4f Post-Emergency Activities

Immediately after the emergency, and once initial release or spill control and containment have 16 been completed, the RCRA Emergency Coordinator will ensure that necessary decontamination 17 occurs and that recovered hazardous waste is properly managed, stored, and/or disposed, as 18 required by 20.4.1.300 NMAC (incorporating 40 CFR §262.265(g)) and 20.4.1.500 NMAC 19 (incorporating 40 CFR §264.56(g)). As required by 20.4.1.300 NMAC (incorporating 40 CFR 20 §262.265(h)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(h)), the RCRA Emergency 21 Coordinator will ensure that incompatibility of waste and restoration of emergency equipment 22 are addressed. 23

- 24 D-4f(1) Management and Disposition of Released Material
- When a release of TRU mixed waste has occurred, priority is given to actions required to
 minimize radiological exposure to workers and the public. <u>If the release is TRU mixed waste</u>,
 <u>decontamination and disposition will be in accordance with the RWP. If a release of site-</u>
 <u>generated hazardous waste occurs, the contaminated surface will be cleaned, and</u>
 <u>decontamination materials will be placed in containers and dispositioned appropriately</u>. In most
 cases, these actions taken to address a radiological contamination are sufficient to mitigate any

31 health effects associated with contamination by hazardous waste or hazardous waste

- 32 constituents.
- ³³ If a release of site-generated hazardous waste occurs, the contaminated surface will be
- 34 cleaned, and decontamination materials will be placed in containers and dispositioned
- appropriately. If the release is TRU mixed waste, decontamination and disposition will be in
- ³⁶ accordance with the RWP.
- ³⁷ If radioactive contamination is detected on equipment or on structures, radiological cleanup
- standards will be used to determine the effectiveness of decontamination efforts and/or the final
- disposition of the equipment or structures. Many types of equipment are difficult to

- decontaminate and may have to be discarded as derived waste. Fixatives (e.g., paint or water
- 2 spray on salt in the underground) may be used on contaminated structures if the contamination
- 3 cannot be safely removed.

Following decontamination, the RCRA Emergency Coordinator will ensure that nonradioactive 4 hazardous waste resulting from the cleanup of a fire, an explosion, or a release involving a 5 nonradioactive hazardous waste at the WIPP facility will be contained and managed as a 6 hazardous waste until such time as the waste is disposed of, or determined to be 7 nonhazardous, as defined in 20.4.1.200 NMAC (incorporating 40 CFR Part 261, Subparts C and 8 D). In most cases, knowledge of the material inventories for the various buildings and areas at 9 the facility will allow a hazardous waste determination for the material resulting from the cleanup 10 of a release. When knowledge of the material inventories is not sufficient, samples of the waste 11

- 12 will be collected and analyzed using U.S. Environmental Protection Agency (EPA)-approved
- methods to determine the presence of any hazardous characteristics and/or hazardous waste
 constituents.

15 <u>D-4f(2)</u> Incompatible Waste

16 The RCRA Emergency Coordinator will ensure, in accordance with 20.4.1.300 NMAC

(incorporating 40 CFR §262.262(h)(1)) and 20.4.1.500 NMAC (incorporating 40 CFR

18 §264.56(h)(1)), that in the affected area(s) of the facility, no waste that may be incompatible with

the released material is treated, stored, or disposed of until cleanup has been completed. The

20 RCRA Emergency Coordinator will not allow hazardous or TRU mixed waste operations to

resume in a building or area in which incompatible materials have been released prior to

completion of necessary post-emergency cleanup operations to remove potentially incompatible

materials. In making the determination of compatibility, the RCRA Emergency Coordinator will
 have available the resources and information described in Section D-4b, *Identification of*

Released Materials and Assessment of the Extent of the Emergency.

26 D-4f(3) Cleaning and Restoration of Equipment

27 The RCRA Emergency Coordinator will take measures to ensure, in accordance with 20.4.1.300

NMAC (incorporating 40 CFR §262.262(h)(2)) and 20.4.1.500 NMAC (incorporating 40 CFR

²⁹ §264.56(h)(2)), that in the affected area(s) of the facility, emergency equipment listed in the

30 RCRA Contingency Plan, and used in the emergency response, is cleaned and fit for its

intended use or replaced before operations are resumed.

Any equipment that cannot be decontaminated will be discarded as waste (e.g., hazardous, mixed, solid), as appropriate. After the equipment has been cleaned, repaired, or replaced, a

post-emergency facility and equipment inspection will be performed, and the results will be

- 35 documented.
- 36 D-5 Required Reporting

The RCRA Emergency Coordinator, on behalf of the Permittees, will note in the operating

³⁸ record <u>Operating Record</u> the time, date, and details of the incident that required implementation

of the *RCRA Contingency Plan*. In compliance with 20.4.1.300 NMAC (incorporating 40 CFR

40 §262.265(i)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i)), within 15 days after the

incident, the Permittees will ensure that a written report on the incident will be submitted to the

42 Secretary of the NMED. The report will include:

- The name, address, and telephone number of the Owner/Operator
- 2 The name, address, and telephone number of the facility
- The date, time, and type of incident (e.g., fire, explosion, or release)
- The name and quantity of material(s) involved
- 5 The extent of injuries, if any
- An assessment of actual or potential hazards to human health or the environment, 7 where this is applicable
- The estimated quantity and disposition of recovered material that resulted from the
 incident

10 D-6 Emergency Equipment

A variety of equipment is available at the facility for emergency response, containment, and 11 cleanup operations in the surface HWMUs, the underground HWDUs, and the WIPP facility in 12 general. This includes equipment for spill control, fire control, personnel protection, monitoring, 13 first aid and medical attention, communications, and alarms. This equipment is immediately 14 available to emergency response personnel. A listing of major emergency equipment available 15 at the WIPP facility, as required by 20.4.1.300 NMAC (incorporating 40 CFR §262.261(e)) and 16 20.4.1.500 NMAC (incorporating 40 CFR §264.52(e)), is shown in Table D-2. Table D-2 also 17 includes the location and a physical description of each item on the list along with a brief outline 18 of its capabilities. The fire-water distribution system map is shown in Figure D-5D-4/Figure D-4-19 NFB. Equipment specified at the locations listed in Table D-2 are inspected in accordance with 20 the inspection schedule specified in Attachment E, Table E-1, as required by 20.4.1.500 NMAC 21 (incorporating 40 CFR §264.15(b)). 22

23 D-7 Emergency Response Agreements

The Permittees have established agreements with federal, state, and local emergency response 24 agencies and mining companies in the vicinity of the WIPP facility for firefighting, medical 25 assistance, hazardous materials response, and law enforcement. In the event that on-site 26 response resources are unable to provide the needed response actions during a medical, fire, 27 hazardous materials, or security emergency, the RCRA Emergency Coordinator will notify 28 appropriate <u>emergency</u> response agencies and request assistance. Once on site, emergency 29 response agency personnel will perform emergency response activities under the direction of 30 the Incident Commander. 31

The agreements with federal, state, and local agencies and mining companies in the vicinity of the WIPP facility for emergency response capabilities are on file at the WIPP facility. Additional agreements may be established when needed. A description<u>Descriptions</u> of the agreements with federal, state, and local agencies and mining operations in the vicinity of the WIPP facility, as required by 20.4.1.300 NMAC (incorporating 40 CFR §§262.256 and 262.261(c)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.37 and §264.52(c)), include, but is not limited to, the following:

- Agreements with local mining companies, including Intrepid Potash NM LLC, White
 Marble Mine, and Mosaic Potash Carlsbad Inc. provide for mutual aid and assistance, in
 the form of MRTs, in the event of a mine disaster or other circumstance at either of the
 facilities. This provision ensures that the WIPP MOC will have two MRTs available at all
 times when miners are underground.
- -An agreement with the U.S. Department of Interior (DOI), represented by the Bureau of
 Land Management (BLM), Roswell District, for wildland firefighting support within the
 WIPP Land Withdrawal Area.
- Agreements for mutual-aid firefighting with Eddy County, the City of Hobbs, and the City of Carlsbad for assistance, including equipment and personnel.
- A mMutual-aid Agreements with the City of Hobbs and the City of Carlsbad for mutual ambulance, medical, rescue, and hazardous material response services; for use of WIPP facility radio frequencies during emergencies; and for mutual security and law enforcement services, within the appropriate jurisdiction limits of each party.
- Agreements with the Lea Regional Medical Center and the Carlsbad Medical Center for
 the treatment of persons with radiological contamination who have incurred injuries
 beyond the treatment capabilities at the WIPP site<u>facility</u>. The WIPP facility provides
 transport of the patient(s) to the medical center.
- Agreements with the Sheriff of Eddy County and the Sheriff of Lea County for mutual law enforcement services support.
- An agreement with the New Mexico Department of Homeland Security and Emergency
 Management for mutual emergency management support, access to state law
 enforcement, public works, and transportation assets.
- 24 D-8 Evacuation Plan

If it becomes necessary to evacuate all or part of the WIPP facility, on-site assembly and off-site
staging areas have been established. The off-site staging areas are outside the security fence.
The Permittees have plans and implementation procedures for both surface and underground
evacuations. Drills are performed on these procedures at the WIPP facility at least annually. The
following sections describe the evacuation plan for the WIPP facility, as required under
20.4.1.300 NMAC (incorporating 40 CFR §262.261(f)) and 20.4.1.500 NMAC (incorporating 40
CFR §264.52(f)).

32 <u>D-8a</u> Surface Evacuation On-site <u>Assembly</u> and Off-site Staging Areas

- ³³ Figures D-6D-1/Figure D-1-NFB shows the surface assembly and staging areas. Security
- officers remain at the primary staging area <u>WIPP facility main gate 24 hours a day</u>, and the
- vehicle trap is opened for personnel during emergency evacuations. The north gate has a
- ³⁶ single-person gate and a large gate which that can be opened, similar to the main gates. for the
- primary staging area. The east gate is a turnstile gate. Upon notification, security personnel will
- respond, open gates, and facilitate egress for evacuation.

1 If a building or area evacuation is necessary, the RCRA Emergency Coordinator, in conjunction

- 2 with the Incident Commander, will determine which assembly area is to be used and will
- 3 communicate the selection to facility personnel. The preferred evacuation route is determined
- 4 based on the nature of the event, prevailing weather conditions, and actual or potential
- 5 radiological release. If site evacuation is necessary, the RCRA Emergency Coordinator, in
- 6 conjunction with the Incident Commander, will decide which staging area is to be used and will
- 7 communicate the selection to facility personnel. The WIPP site evacuation routes are shown in
- 8 Figure D-8. The surface evacuation alarm and public address system are used to direct
- 9 personnel evacuation. Persons responsible for surface accountability will direct personnel to the
- selected staging area outside the security fence.
- ¹¹ Personnel report to the designated assembly or staging area where accountability is conducted
- 12 (Figure <u>D-6D-1/Figure D-1-NFB</u>). Personnel who are working in a contaminated area when site
- evacuation is announced will assemble at specific staging areas for potentially contaminated
- 14 personnel in order to minimize contact with other personnel during the evacuation.

15 <u>D-8b</u> Underground Assembly Areas and Egress Hoist Stations

- ¹⁶ Depending upon the type of emergency and level of response, it may be necessary for
- personnel in the underground to shelter in place, report top to designated assembly areas
- 18 (Figure D-7D-3), or to evacuate the underground. Underground personnel are trained to
- ¹⁹ immediately report to assembly areas under specific circumstances (i.e., loss of underground
- 20 power or ventilation). Underground accountability is taken when the underground is sheltered in
- 21 place or evacuated. The Underground Controller is responsible for underground personnel
- accountability. Each assembly area contains a mine pager phone, miner's aid station, and
- 23 evacuation maps.
- In accordance with 30 CFR §57.11050, the mine maintains two escapeways. These
- escapeways are designated as Egress Hoist Stations. When the need for an underground
- evacuation has been determined, underground personnel report to the Egress Hoist Stations.
- 27 Decontamination of underground personnel will be conducted <u>consistent with radiological</u>
- 28 control procedures pursuant to 10 CFR Part 835the same way as described for surface
- 29 decontamination. Contaminated personnel are trained to remain segregated from other
- ³⁰ personnel until radiological contamination control personnel can respond.

31 D-8c Plan for Surface Evacuation

- 32 Surface evacuation notification is initiated by the CMRO, as directed by the RCRA Emergency
- ³³ Coordinator, via sound-ing sounding of the surface evacuation alarm and providing incident
- information via the public address system. The persons responsible for surface accountability
- assist personnel in evacuation from their areas. Egress routes from buildings and site
- evacuation routes and instructions are posted in designated areas throughout the site. Egress
- routes from the WHB Unit are shown in Figures D-6a, D-6b, and D-6c<u>D-5</u> through D-7.
- ³⁸ If the ERT members have been notified to respond to an identified area, these members will not
- ³⁹ depart the site during an evacuation, but will report to the Incident Commander for instructions
- and accountability. The ERT members will not evacuate until released by the Incident
- 41 Commander.

D-8d Plan for Underground Evacuation 1

Notification for underground evacuation will be made using the underground evacuation alarm 2 and strobe light signals. 3

Personnel will evacuate to the nearest Egress Hoist Station. Primary underground escape 4

routes (identified by green reflectors on the rib) will be used, if possible. Secondary underground 5

escape routes (identified by red reflectors on the rib) will be used if necessary (Figure D-3D-4). 6

Detailed descriptions of escapeways and an underground escape map are included in the 7

Underground Escape and Evacuation Plan on file at the WIPP facility, as required by MSHA, 30 8

CFR §57,11053, for underground mining situations. The MSHA required map takes precedence 9

over Figure D-3D-4, Underground Escape and Evacuation Map, should an underground mine 10

related event occur necessitating a change to the evacuation routes. The Underground 11 Controller is responsible for underground personnel accountability and for reporting

12

accountability to the RCRA Emergency Coordinator. 13

Upon reaching the surface, personnel will report to their on-site surface assembly or off-site 14 staging area, as directed, to receive further instructions. 15

Members of the WIPP Fire Department and the MRT who may be underground, will assist in the 16 evacuation of the underground when an underground evacuation is called for. A reentry by the 17 MRT will be performed according to 30 CFR Part 49 and MSHA regulations for reentry into a 18 mine. The MRTs are trained in compliance with 30 CFR Part 49 in mine mapping, mine gases, 19 ventilation, exploration, mine fires, rescue, and recovery. 20

D-8e Further Site Evacuation 21

In the event of an evacuation involving the need to transport employees, the following 22 transportation will be available: 23

- Buses/vans—WIPP facility buses/vans will be available for evacuation of personnel. The • 24 buses/vans are stationed in the employee parking lot. 25
- Privately Owned Vehicles—Because many employees drive to work in their own 26 vehicles, these vehicles may be used in an emergency. Personnel will be provided 27 routes to be taken when leaving the facility. 28
- These vehicles may be used to transport personnel who have been released from the site by 29 the RCRA Emergency Coordinator. 30

The primary evacuation routes for the WIPP facility is Louis Whitlock Roadare the main DOE 31 north/south access road, which connects to U.S. Highways 62/180 (to the north) and State 32

Highway 128 via the South Access Road(south). Alternate evacuation routes from the facility 33

- are provided at the south side and the east side of the facility (Figure D-8). 34
- D-9 Location of the RCRA Contingency Plan and Plan Revision 35
- In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §§262 and 262.262(a)) and 36
- 20.4.1.500 NMAC (incorporating 40 CFR §264.53(a)), the owner/operator of the WIPP facility 37
- will ensure that copies of this RCRA Contingency Plan are maintained at the WIPP facility and 38

- are available to the emergency personnel and organizations described in Section D-2. When the
- 2 RCRA Contingency Plan is revised, updated copies are distributed (electronically or via site
- 3 mail) or hand delivered to applicable WIPP facility emergency personnel and Emergency
- 4 Operations Centers. In addition, the Permittees will make copies available to the following
- 5 federal, state, and local agencies and mining companies in the vicinity of the WIPP facility, as
- 6 required by 20.4.1.300 (incorporating 40 CFR §262.262(a)) and 20.4.1.500 NMAC
- 7 (incorporating 40 CFR §264.53(b)):
- Intrepid Potash New Mexico LLC
- 9 White Marble Mine
- Mosaic Potash Carlsbad Inc.
- City of Carlsbad
 - Carlsbad Medical Center, Carlsbad
 - Lea Regional Medical Center, Hobbs
- City of Hobbs

12

13

15

16

17

18

21

22

23

- BLM, Carlsbad
- New Mexico State Police
- New Mexico Department of Homeland Security and Emergency Management
- Eddy County Commission
- Sheriff of Eddy County
- 20 •___Sheriff of Lea County
 - Eddy County Fire Service
 - Eddy County Emergency Management
 - Lea County Emergency Management
- In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.263) and 20.4.1.500 NMAC
 (incorporating 40 CFR §264.54), the Permittees will ensure that this plan is reviewed and
 amended whenever:
- The Permit for the WIPP facility is revised in any way that would affect the RCRA Contingency Plan;
- This plan fails in an emergency;
- The WIPP facility design, construction, operation, maintenance, or other circumstances change in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous constituents or change the response necessary in an emergency;
- The list of RCRA Emergency Coordinators changes; or
- The list of WIPP facility emergency equipment changes.

		TABLES

 Table D-1

 Resource Conservation and Recovery Act Emergency Coordinators¹

Name	Address*	Office Phone	Personal Phone*	24-Hour Emergency Phone
J. E. (Joseph) Bealler		(575) 234-8276 or (575) 234-8916		(575) 234-8111
M. G. (Mike) Proctor		(575) 234-8276 or (575) 234-8143		(575) 234-8111
G. L. (Gary) Kessler		(575) 234-8326		(575) 234-8111
P. J. (Paul) Paneral		(575) 234-8498		(575) 234-8111
M. L. (Mark) Long		(575) 234-8170		(575) 234-8111
A.C. (Andy) Cooper		(575) 234-8197		(575) 234-8111
C.J. (Chris) Belis		(575) 628-5851		(575) 234-8111
B.R. (Bobby) Franco		(575) 234-8163		(575) 234-8111
G.W. (Gregory) Brown		(575) 234-5862		(575) 234-8111
R.D. (Ryan) Parrish		(575) 234-8638		(575) 234-8111

* NOTE: Personal information (home addresses and personal phone numbers) has been removed from informational copies of this Permit.

¹ For every shift, one qualified RCRA Emergency Coordinator serves as the primary, and a second qualified RCRA Emergency Coordinator is available to serve as the alternate.

Table D-2Emergency Equipment Maintained at the Waste Isolation Pilot Plant

Equipment	Description and Capabilities	Location	
Building Fire Alarms	Fire alarm panels, fire alarm transmitter, audible alarm devices (e.g., horns, bells, tones) that provide notification of fires; transmitted to the CMR	Guard and Security Building (Building 458), Water Pumphouse (Building 456), Warehouse/Shops Building (Building 453), Exhaust Shaft Filter Building (Building 413), New Filter Building (Building 416), Salt Reduction Building (NFB) (Building 416), Salt Reduction Building (SRB) (Building 417), Support Building (Building 451), CMR/Computer Room, Waste Handling Building (Building 411), TRUPACT Maintenance Building (Building 412), Salt Handling (SH) Shaft Hoisthouse (Building 384), Auxiliary Warehouse Building (Building 455), Engineering Building (Building 486), Training Building (Building 489), Safety and Emergency Services Facility (Building 452), and CAAs (Building 452), and CAAs (Building 454A and 474B)	
Underground Fire Alarms	Fire alarm panels, fire alarm transmitter, and audible/visual alarm devices (e.g., horns, bells, strobes) that provide notification of fires; transmitted to the CMR	Fire detection and control panel locations: Waste Shaft Underground Station, SH Shaft Underground Station, Between E-140 and E-300 in S-2180 Drift, Fuel Station (N150/W170)	
Site Notification System; Underground Evacuation Alarm System	For surface, alarms and notifications transmitted over paging channel of the public address system, manually initiated; for underground, audible alarm	Site-wide	
Public Address System	Includes intercom phones; handset stations and loudspeaker assemblies	Site-wide	

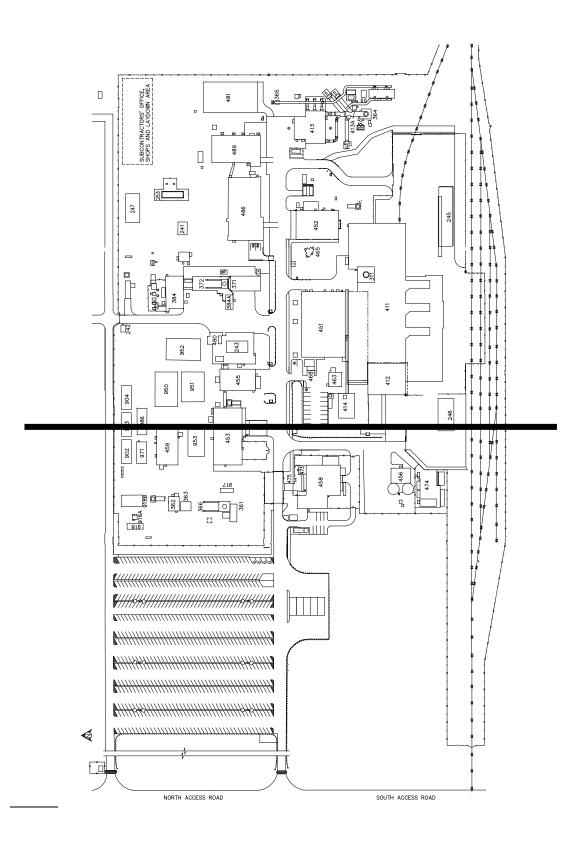
Equipment	Description and Capabilities	Location		
Mine Pager Phones	Battery-operated paging system	Underground at S550/W30, S1000/W30, S1950/E140, SH Shaft Collar and Underground Station Waste Shaft Collar and Underground Station; – surface at Support Building (Building 451, FSM desk, CMR, lamproom), Safety and Emergency Services Facility (Building 452, Fire Department workstation area, Mine Rescue Room)		
Portable Radios	Two-way, portable; transmits and monitors information to/from other transmitters	Issued to individuals		
Plant- <u>-</u> Base <u>d</u> Radios	Two-way, stationary; transmits and monitors information to/from other transmitters-radios	Safety and Emergency Services Facility (Building 452), Guard and Security Building (Building 458), Support Building (Building 451, CMR, FSM desk)		
Mobile Phones	Provide communications link between emergency response personnel, as needed	Issued to individuals plus emergency vehicles		
	Spill Response Equipment and Materials			
HAZMAT Equipment	Spill response equipment and supplies, PPE, and decontamination supplies stored and maintained in accordance with NFPA 1901 and as documented in WIPP facility files	Surface, in designated areas near Safety and Emergency Services Facility (Building 452)		
Absorbent Materials	Containment or cleanup of spills, including: Pressurized spill-response gun; Absorbent sheets and/or dikes for containment or cleanup of spills of oil, petroleum-based chemicals, and general liquids; Spill-control material for solvents and neutralizing absorbents and for acids/caustics	Surface, in designated areas near Safety and Emergency Services Facility (Building 452)		
Medical Resources				
Ambulance	A minimum of one ambulance, maintained and equipped in accordance with the New Mexico Ambulance Standard, 18.3.14 NMAC, and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay)		
Medical Cart	A minimum of one medical cart, equipped to provide basic life support operations, as documented in WIPP facility files	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)		
Miners First Aid Stations	Equipped per 30 CFR 57.15001	Underground (Salt Shaft Area, Waste Shaft Area, E300 Maintenance Shop, and at S1000/W30, S1300/W30, and S1950/E140)		

Equipment	Description and Capabilities	Location	
Fire Detection and Fire Suppression Equipment			
Building Smoke, Thermal Detectors, or Manual Pull Stations	Devices that trigger an alarm and/or fire suppression system	Guard and Security Building (Building 458), Warehouse/Shops Building (Building 453), Support Building (Building 451, CMR/Computer Room), Waste Handling Building (Building 411), TRUPACT Maintenance Building (Building 412), Underground Fuel Station (N150/W170), SH Shaft Hoisthouse (Building 384), Engineering Building (Building 486), Safety and Emergency Services Facility (Building 452), and Training Building (Building 489)	
Fire Trucks	A minimum of two fire trucks to assist in fighting fires; firefighter equipped in accordance with NFPA 1901 and/or 1906 and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay)	
Rescue Cart/Truck	A minimum of two special-purpose vehicles, one on the surface and one in the underground; light rescue units, equipped in accordance with the NFPA 1901 and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay) and Underground (Emergency Vehicle Parking/Charging Area at S700/E140)	
Fire Suppression Cart	A minimum of one special-purpose electric cart to assist in fighting fires; equipped with a minimum of one fire extinguisher	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)	
Fire Extinguishers	Hand-held fire extinguishers; located throughout the facility in accordance with NFPA- ₌ 10	Surface and underground locations used for hazardous waste management, as documented in WIPP facility files	
Automatic Dry Chemical Extinguishing Systems	Automatic; actuated by thermal detectors or by manual pull stations	Underground fuel station (N150/W170)	
Automatic Fire Suppression Systems on liquid fueled vehicles	Individual automatic fire suppression systems installed on applicable liquid-fueled vehicles, as determined by a fire risk assessment performed in accordance with NFPA 122	Surface and underground locations used for hazardous waste management, as documented in WIPP facility files	

Equipment	Description and Capabilities	Location
Sprinkler Systems	NFPA water-based fire suppression systems	Water Pumphouse (Building 456), Guard and Security Building (Building 458), Waste Handling Building (Building 411, CH Bay, RH Bay, and Overpack Repair Areas only),TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413), NFB (Building 416), SRB (Building 417), and CAAs (Buildings 474A and 474B)
Water Tanks, Hydrants	Fire suppression water supply; one 180,000-gallon capacity tank, plus a second tank with 100,000-gallon reserve	Tanks are at southwestern edge of WIPP facility; pipelines and hydrants are throughout the surface
Fire Water Pumps	Fire suppression water supply; pumps are minimally rated at 125 pounds per square inch, 1,500 gallons per minute centrifugal pump, one with electric motor drive, the other with diesel engine; pressure maintenance jockey pump	Water Pumphouse (Building 456)
	Personal Protection Equipment	
Head Lamps	Mounted on hard hat; battery operated	Each person underground
Underground Self- Rescuer Units	Short-term self-rescue devices per 30 CFR 57.15030	Each person underground
Self-Contained Self- Rescuer	Air supply; a minimum of 12 caches in the underground; self-contained rescue units shall be adequate to protect an individual for one hour or longer or, alternatively, sufficient to allow the employee time to reach an additional self- contained self-rescue device in the underground per NMSA 69-8-16	Cached throughout the underground
Mine Rescue Self- Contained Breathing Apparatus (SCBA)	Oxygen supply; 4-hour closed circuit units consistent with 30 CFR 49.6; a minimum of 12 units, one for each Mine Rescue Team member	Safety and Emergency Services Facility (Building 452, Mine Rescue Training Room)
Fire Department Self-Contained Breathing Apparatus (SCBA)	Air supply; a minimum of 12 units; SCBAs shall meet the minimum requirements established per NFPA 1981	Surface Fire Trucks and Rescue Truck; Underground Rescue Cart
	General Plant Emergency Equipment	
Emergency Lighting	For employee evacuation, and fire/spill containment; linked to main power supply, and selectively linked to back up diesel power supply and/or battery-backed power supply	Waste Handling Building (Building 411); TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413) NFB (Building 416), and SRB (Building 417)
Backup Power Sources	A minimum of two diesel generators, and battery-powered uninterruptible power supply (UPS)	Generators are located on the surface. UPS is located at the essential loads

Equipment	Description and Capabilities	Location
Emergency Hoist	Hoist in Air Intake Shaft	Air Intake Shaft (Building 361)
Emergency Showers	For emergency flushing of chemical contact or injury	Waste Handling Building (Building 411) is served by
		the decontamination shower trailer located north of Building 411, in front of Building 952, between Buildings 243 and 455; and CAAs (Building 474A)
Emergency Eyewash Equipment	For emergency flushing of affected eyes	Waste Handling Building (Building 411, RH Bay, Site Derived Waste Area, Waste Shaft Collar, and Room 108 TRUPACT III only), TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413), NFB (Building 416), SRB (Building 417), CAAs, and SAAs
Overpack containers for TRU Mixed Waste	85 Gallon drums SWBs TDOP	Warehouse Annex (Building 481)
Aquaset or Cement	Material for solidification of liquid waste generated as a result of fire fighting fire fighting water or decontamination solutions	Surface Connex A, located south of Waste Handling Building (Building 411)
TDOP Upender	Upender facilitates overpacking standard waste boxes <u>into</u> <u>TDOPs</u>	Waste Handling Building (Building 411)
Non hazardous <u>Nonhazar</u> dous Decontaminating Agents	For decontamination of surfaces, equipment, and personnel	Waste Handling Building (Building 411); Surface Connex A, located south of Building 411

FIGURES



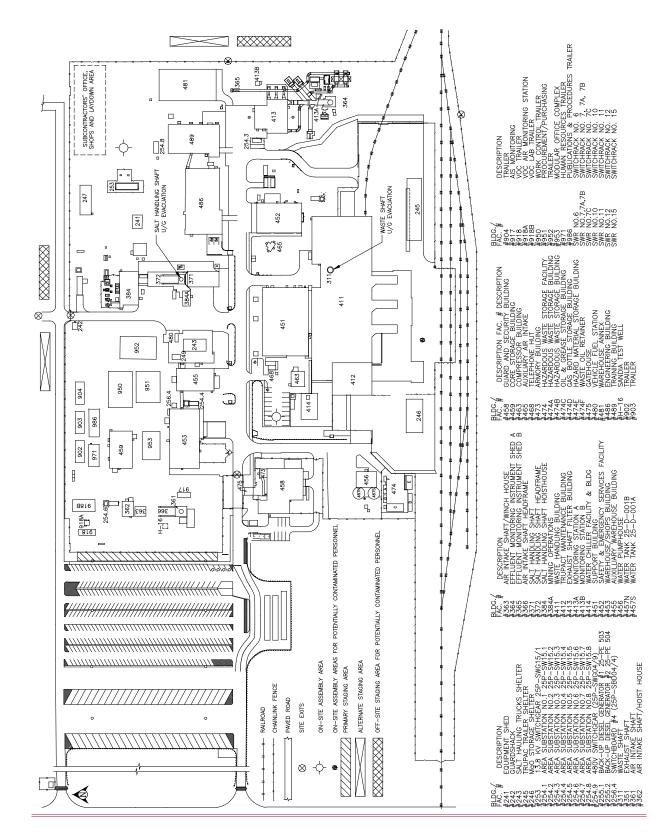
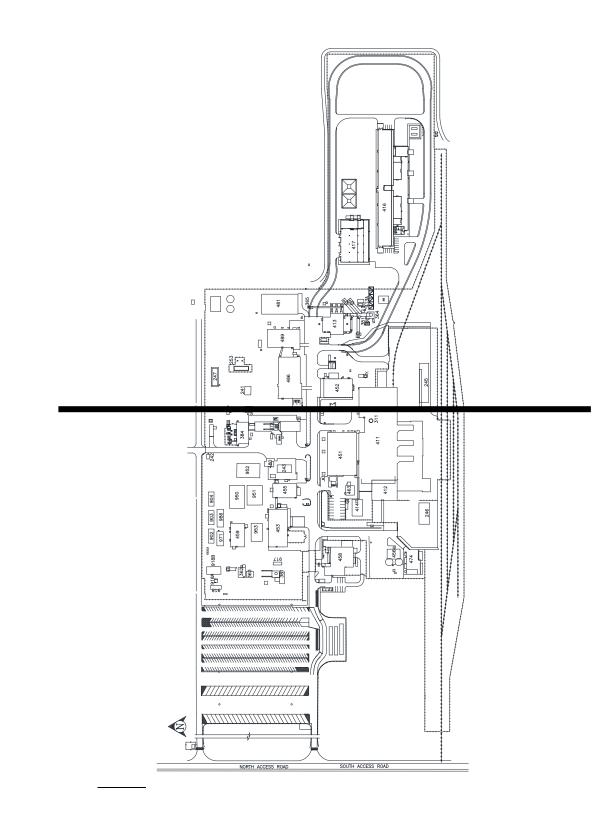


Figure D-1 WIPP Surface Structures

	BLDG./		BLDG./		BLDG./	
_	FAC. #	DESCRIPTION	FAC. #	DESCRIPTION	FAC. #	DESCRIPTION
	\$241	EQUIPMENT SHED	#384	SALT HANDLING SHAFT HOISTHOUSE	#475	GATEHOUSE
	\$242	GUARDSHACK	#384A	MINING OPERATIONS	#480	VEHICLE FUEL STATION
	\$243	SALT HAULING TRUCKS SHELTER	#411	WASTE HANDLING BUILDING	#481	WAREHOUSE ANNEX
	\$245	TRUPACT TRAILER SHELTER	#412	TRUPACT MAINTENANCE BUILDING	#486	ENGINEERING BUILDING
	\$246	MgO STORAGE SHELTER	#413	EXHAUST SHAFT FILTER BUILDING	#489	TRAINING BUILDING
#	\$253	13.8 KV SWITCHGEAR 25p-SWG15/1	#413A	MONITORING STATION A	#H-16	SANDIA TEST WELL
#	\$254.1	AREA SUBSTATION N0.1 25P-SW15.1	#413B	MONITORING STATION B	#917	AIS MONITORING
#	\$254.2	AREA SUBSTATION N0.2 25P-SW15.2	#414	WATER CHILLER FACILITY & BLDG	#918	VOC TRAILER
#	\$254.3	AREA SUBSTATION N0.3 25P-SW15.3	#451	SUPPORT BUILDING	#918A	VOC AIR MONITORING STATION
#	\$254.4	AREA SUBSTATION N0.4 25P-SW15.4	#452	SAFETY & EMERGENCY SERVICES FACILITY	#918B	VOC LAB TRAILER
#	\$254.5	AREA SUBSTATION N0.5 25P-SW15.5	#453	WAREHOUSE/SHOPS BUILDING	#950	WORK CONTROL TRAILER
#	\$254.6	AREA SUBSTATION N0.6 25P-SW15.6	#455	AUXILLIARY WAREHOUSE BUILDING	#951	PROCUREMENT/PURCHASING
#	\$254.7	AREA SUBSTATION N0.7 25P-SW15.7	#456	WATER PUMPHOUSE	#952	TRAILER
#	\$254.8	AREA SUBSTATION NO.8 25P-SW15.8	#457N	WATER TANK 25-D-001B	#953	MODULAR OFFICE COMPLEX
#	\$254.9	480V SWITCHGEAR (25P-SWGO4/9)	#457S	WATER TANK 25-D-001A	#971	HUMAN RESOURCES TRAILER
#	\$255.1	BACK-UP DIESEL GENERATOR #1 25-PE 503	#458	GUARD AND SECURITY BUILDING	#986	PUBLICATIONS & PROCEDURES TRA
#	\$255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#459	CORE STORAGE BUILDING	SWR NO.6	SWITCHRACK NO. 6
#	\$256.4	SWITCHBOARD #4 (25P-SBD04/4)	#463	COMPRESSOR BUILDING	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#	#311	WASTE SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.7C	SWITCHRACK NO. 7C
#	#351	EXHAUST SHAFT	#468	TELEPHONE HUT	SWR NO.10	SWITCH RACK NO. 10
#	#361	AIR INTAKE SHAFT	#473	ARMORY BUILDING	SWR NO.11	SWITCH RACK NO. 11
#	#362	AIR INTAKE SHAFT/HOIST HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY	SWR NO.12	SWITCH RACK NO. 12
#	# 363	AIR INTAKE SHAFT/WINCH HOUSE	#474A	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.15	SWITCH RACK NO. 15
#	#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474B	HAZARDOUS WASTE STORAGE BUILDING		
#	#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474C	OIL & GREASE STORAGE BUILDING		
#	# 366	AIR INTAKE SHAFT HEADFRAME	#474D	GAS BOTTLE STORAGE BUILDING		
#	ŧ371	SALT HANDLING SHAFT	#474E	HAZARD MATERIAL STORAGE BUILDING		
#	#372	SALT HANDLING SHAFT HEADFRAME	#474F	WASTE OIL RETAINER		

Figure D-1a Legend to Figure D-1



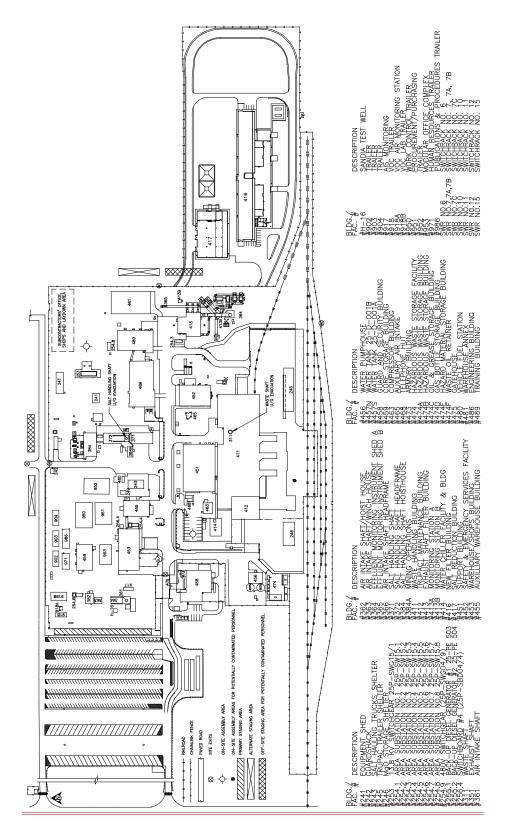


Figure D-1-NFB WIPP Surface Structures with Building 416

BLDG./		BLDG./		BLDG./	
FAC. #	DESCRIPTION	FAC. #	DESCRIPTION	FAC. #	DESCRIPTION
#241	EQUIPMENT SHED	#384A	MINING OPERATIONS	#475	GATEHOUSE
#242	GUARDSHACK	#411	WASTE HANDLING BUILDING	#480	VEHICLE FUEL STATION
#243	SALT HAULING TRUCKS SHELTER	#412	TRUPACT MAINTENANCE BUILDING	#481	WAREHOUSE ANNEX
#245	TRUPACT TRAILER SHELTER	#413	EXHAUST SHAFT FILTER BUILDING	#486	ENGINEERING BUILDING
#246	MgO STORAGE SHELTER	#413A	MONITORING STATION A	#489	TRAINING BUILDING
#253	13.8 KV SWITCHGEAR 25p-SWG 15/1	#413B	MONITORING STATION B	#H-16	SANDIA TEST WELL
#254.1	AREA SUBSTATION NO.1 25P-SW15.1	#414	WATER CHILLER FACILITY & BLDG	#902	TRAILER
#254.2	AREA SUBSTATION NO.2 25P-SW15.2	#416	NEW FILTER BUILDING	#903	TRAILER
#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#417	SALT REDUCTION BUILDING	#904	TRAILER
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#451	SUPPORT BUILDING	#917	AIS MONITORING
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#452	SAFETY & EMERGENCY SERVICES FACILITY	#918	VOC TRAILER
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#453	WAREHOUSE/SHOPS BUILDING	#918A	VOC AIR MONITORING STATION
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#455	AUXILLIARY WAREHOUSE BUILDING	#918B	VOC LAB TRAILER
					ROL TRAILER
#254.9	480V SWITCHGEAR (25P-SWGO4/9)	#457N	WATER TANK 25-D-001B	#951	PROCUREMENT/PURCHASING
#255.1	BACK-UP DIESEL GENERATOR #1 25-PE 503	#457S	WATER TANK 25-D-001A	#952	TRAILER
#255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#458	GUARD AND SECURITY BUILDING	#953	MODULAR OFFICE COMPLEX
#256.4	SWITCHBOARD #4 (25P-SBDO4/4)	#459	CORE STORAGE BUILDING	#971	HUMAN RESOURCES TRAILER
#311	WASTE SHAFT	#463	COMPRESSOR BUILDING	#986	PUBLICATIONS & PROCEDURES TRAI
#351	EXHAUST SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.6	SWITCHRACK NO. 6
#361	AIR INTAKE SHAFT	#468	TELEPHONE HUT	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#362	AIR INTAKE SHAFT/HOIST HOUSE	#473	ARMORY BUILDING	SWR NO.7C	SWITCHRACK NO. 7C
#363	AIR INTAKE SHAFT/WINCH HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY	SWR NO.10	SWITCHRACK NO. 10
#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474A	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.11	SWITCHRACK NO. 11
#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474B	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.12	SWITCHRACK NO. 12
#366	AIR INTAKE SHAFT HEADFRAME	#474C	OIL & GREASE STORAGE BUILDING	SWR NO.15	SWITCHRACK NO. 15
#371	SALT HANDLING SHAFT	#474D	GAS BOTTLE STORAGE BUILDING		
#372	SALT HANDLING SHAFT HEADFRAME	#474E	HAZARD MATERIAL STORAGE BUILDING		
#384	SALT HANDLING SHAFT HOISTHOUSE	#474F	WASTE OIL RETAINER		

Figure D-1a-NFB, Legend to Figure D-1-NFB (Building 416)

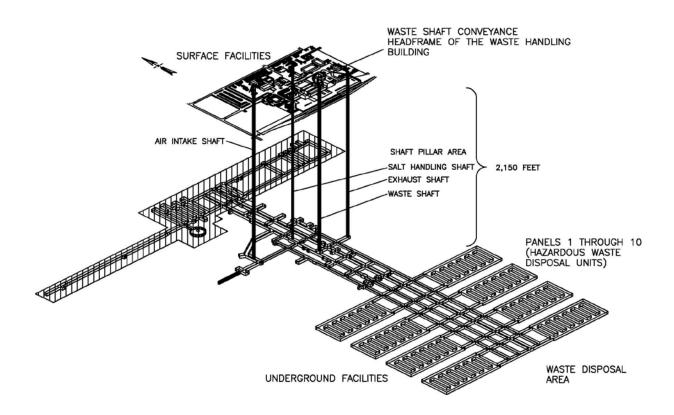


Figure D-2 Spatial View of the WIPP Facility

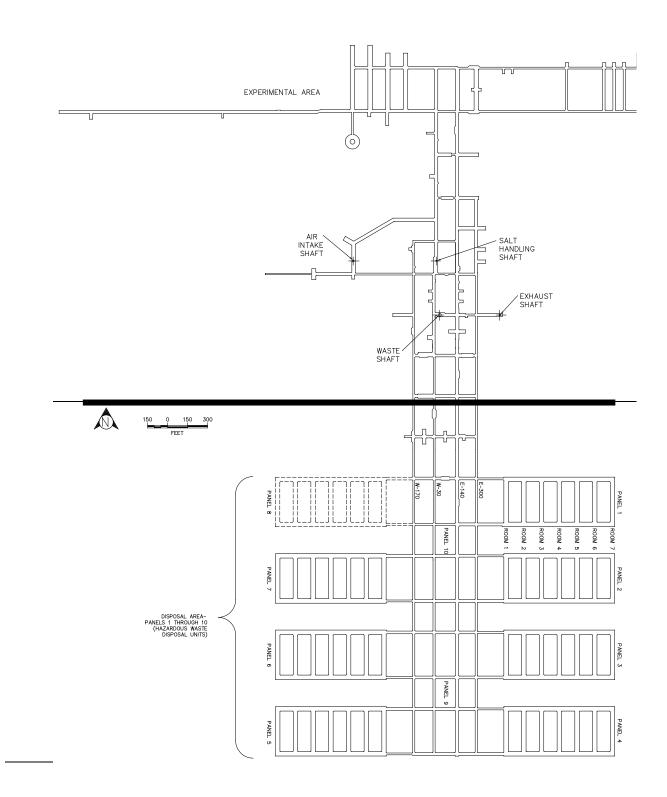


Figure D-3 WIPP Underground Facilities

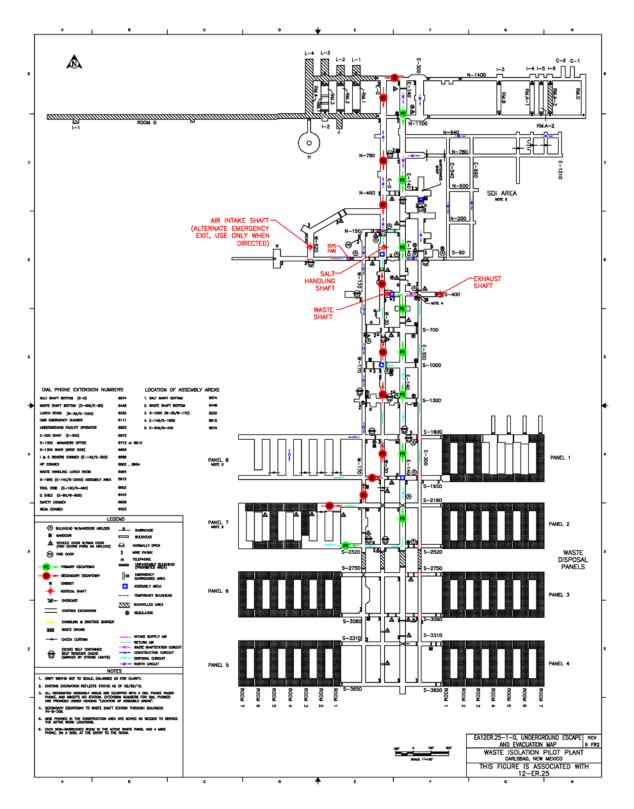


Figure D-<u>3</u>4 Underground Escape and Evacuation Map

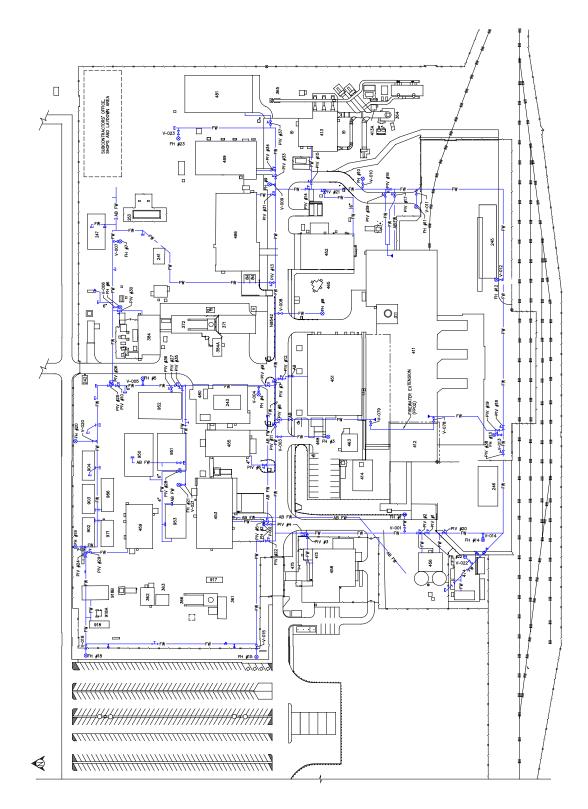


Figure D-<u>4</u>5 Fire-Water Distribution System

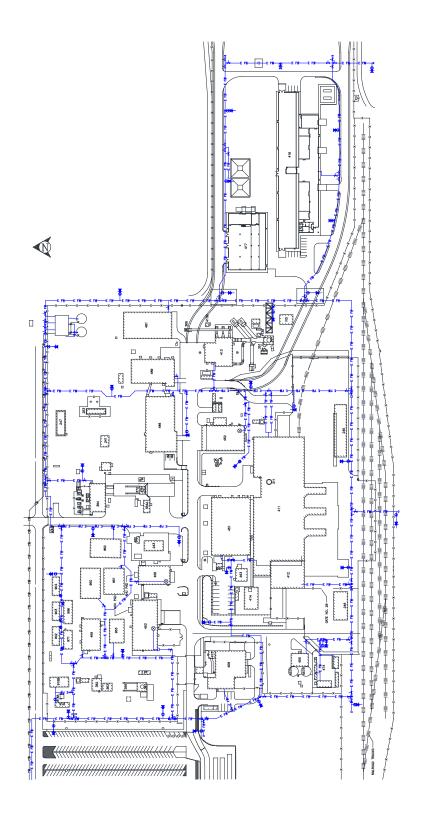


Figure D-<u>4</u>5-NFB Fire-Water Distribution System with Building 416

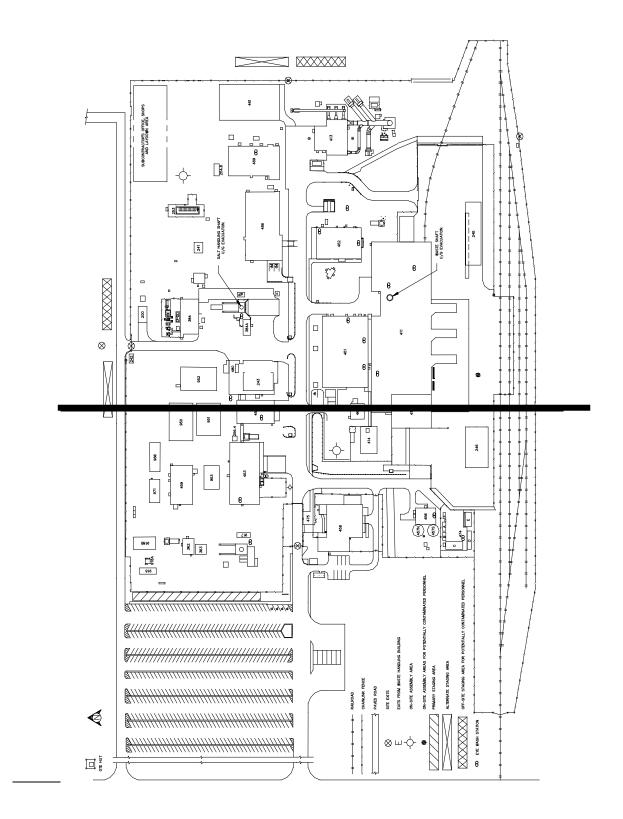


Figure D-6 WIPP On-Site Assembly Areas and Off-Site Staging Areas

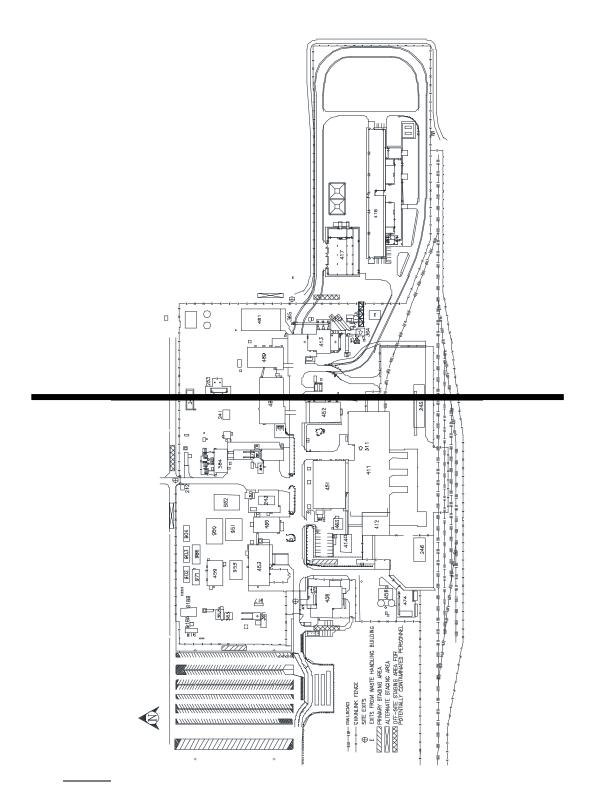


Figure D-6-NFB WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416

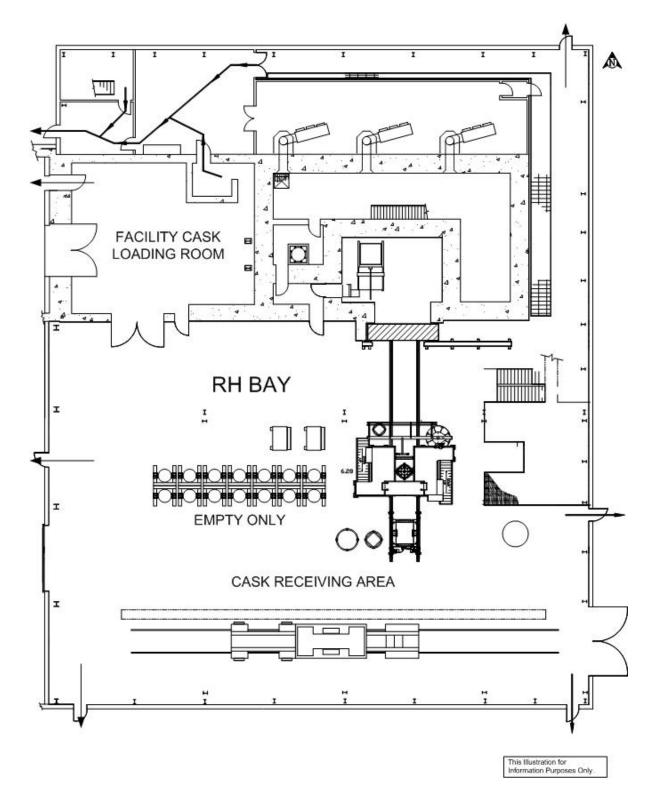


Figure <u>D-6aD-5</u> RH Bay Evacuation Routes

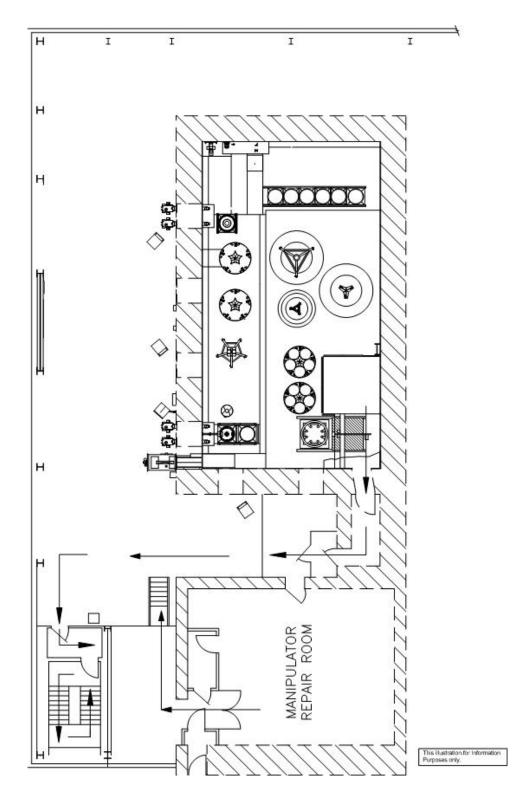


Figure D-6b<u>D-6</u> RH Bay Hot Cell Evacuation Route

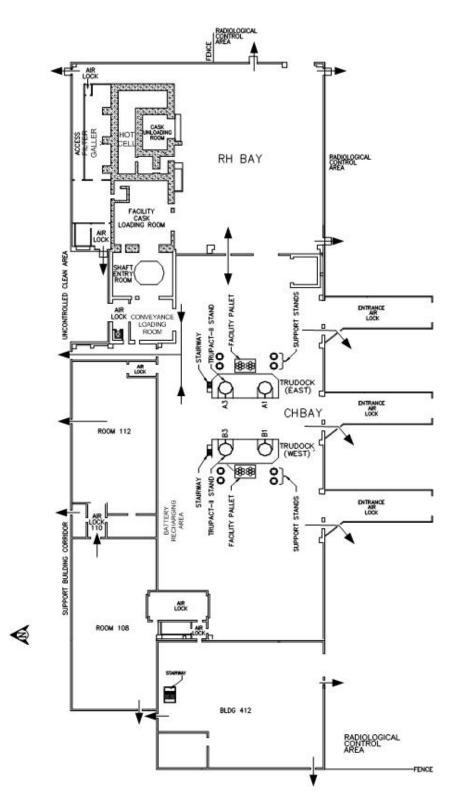


Figure D-6cD-7 Evacuation Routes in the Waste Handling Building

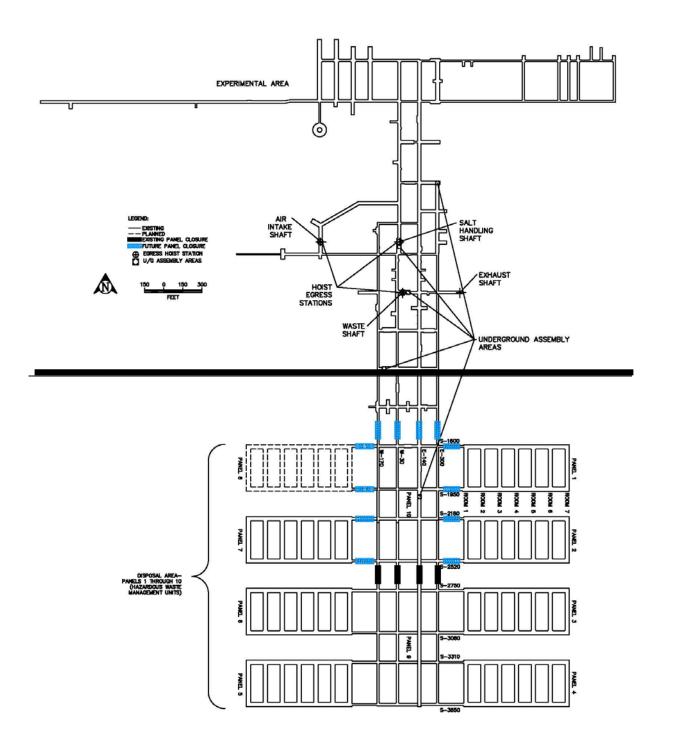


Figure D-7 Designated Underground Assembly Areas

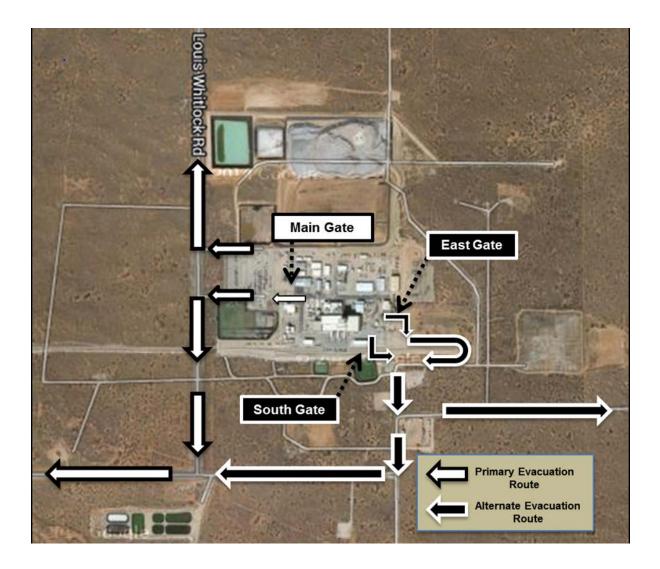


Figure D-8 WIPP Site Evacuation Routes

ADDENDUM D1

PREPAREDNESS AND PREVENTION

ADDENDUM D1

PREPAREDNESS AND PREVENTION

TABLE OF CONTENTS

D1-1	Preparedness and Prevention Requirements			
	D1-1a Equipment Requirements	.2		
	D1-1a(1) Internal Communications			
	D1-1a(2) External Communications	.3		
	D1-1a(3) Emergency Equipment			
	D1-1a(4) Fire Suppression Systems			
	D1-1b Aisle Space Requirement			
D1-2	Preventive Procedures, Structures, and Equipment	.8		
	D1-2a Unloading Operations			
	D1-2b Runoff			
	D1-2c Water Supplies			
	D1-2d Equipment and Power Failure			
	D1-2e Personnel Protection	14		
	D1-2f Releases to Atmosphere	16		
	D1-2g Flammable Gas Concentration Control			
D1-3	Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste	17		

ADDENDUM D1

PREPAREDNESS AND PREVENTION

3 <u>D1-1</u> Preparedness and Prevention Requirements

4 The Permittees' implementation of the Preparedness and Prevention requirements of

5 20.4.1.500 New Mexico Administrative Code (NMAC), incorporating Title 40 of the Code of

6 Federal Regulations (**CFR**) Part 264, Subpart C, at the Waste Isolation Pilot Plant (**WIPP**)

7 facility are described in the following sections.

8 D1-1a Equipment Requirements

9 The WIPP facility is equipped with internal and external communications systems, emergency

10 equipment, and fire suppression systems. As shown in the following sections, the Permittees

commit to meeting the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.32 and

12 §264.34).

1

2

13 D1-1a(1) Internal Communications

The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.32(a)) require a facility to be 14 equipped with an internal communications or alarm system capable of providing immediate 15 16 emergency instructions (voice or signal) to facility personnel. In addition, 20.4.1.500 NMAC (incorporating 40 CFR §264.34(a)), requires that employees have immediate access to an 17 internal alarm or emergency communication device when managing transuranic (TRU) mixed 18 waste. The following discussions demonstrate that the Permittees have equipped the WIPP 19 20 facility with the required internal communication systems and equipment and that the Permittees 21 operate in a manner that complies with these regulations. The intraplant communication systems, designed to provide immediate emergency instructions 22

to facility personnel, include communication by the public address (**PA**) system and its intercom
 phones and paging channels, an intraplant telephone system, mobile phones, mine pager

phones, pagers, portable two-way radios, and local and facility wide alarm systems. The

procedures for notifying facility personnel in an emergency are contained in Renewal

27 Application Attachment D, RCRA Contingency Plan.

The intercom system (with an integral PA system) consists of handset stations and loudspeaker assemblies with multiple amplifiers. The system has multiple channels in the main buildings. Initial communication between parties within the plant can be established by using the paging

channel. Each designated location has a single set of electrically isolated speakers and a

handset. In order to cover most areas in the plant, loudspeakers are properly oriented, and

volume levels are adjusted. If one station fails, the remaining stations are isolated from the out-

of-service unit to prevent a failure in the remaining system.

³⁵ Private branch automatic exchange two-way communication is provided between any two

telephones located above or below ground. Direct dialing to outside telephones and direct

dialing to WIPP facility telephones are provided by this system. Failure of a single telephone

38 station does not affect the balance of the telephone system. If the telephone system should fail,

the PA system and the portable two-way radios also provide surface communications.

- 1 A plant radio station in the Guard and Security Building, one located in the Emergency
- 2 Operations Center in the Safety and Emergency Services Building, and one located in the
- 3 Central Monitoring Room (**CMR**), allow two-way radio communication with on-site personnel
- and with mobile/portable WIPP facility radios operating on and off the WIPP site. The two-way
- 5 radio also allows one-way emergency notification on the pagers. The two-way radio system
- 6 located in the CMR is supplied with power from the uninterruptible power supply if the off-site
- 7 power supply fails.

There are various alarm systems in use at the WIPP facility. The PA system has two alarm 8 tones in use, a velp and a gong. Its signals are produced in the master PA console by a tone 9 generator and are transmitted site-wide over the paging channel of the system, overriding its 10 normal use. The signals are intermittent and of high intensity. The evacuation tone is a yelp tone 11 12 and is used for, and limited to, situations requiring immediate, rapid, and complete (or selective area) evacuation. The evacuation tone is initiated manually on the surface. In the underground, 13 the evacuation tone may be initiated manually or automatically by underground fire detection 14 and alarm systems. The underground evacuation tone is also a yelp tone. It is accompanied 15 with strobe lights for high noise areas. These alarm signals take priority over other signals on 16 the paging channel but do not affect the intercom channels. Evacuation alarms using the PA 17 system, local and plant-wide, also can be initiated manually from the CMR in the Support 18 Building. The audible alarm signals are supplemented by warning lights in high ambient-noise 19 areas underground, such as active mining areas. These alarms are supplied with power from 20 the uninterruptible power supply if the off-site power supply fails. The PA system may also 21 produce a gong tone followed by a message. Local fire alarms are bell tones. 22

- 23 Whenever TRU mixed waste is being handled, two persons, at a minimum, are involved in the
- operation. The Waste Handling Building (**WHB**) contains readily accessible telephones and PA
- stations throughout. The mine pager phones are the main means of communication
- underground, although the PA system is also available.
- 27 Underground communication and alarm systems are arranged to meet the applicable
- requirements of the Mine Safety and Health Administration (**MSHA**) regulations at 30 CFR Part
- 57. Telephones or other two-way communication equipment with instructions for their use are
- 30 provided for communications from underground to the surface. These communications are
- typically moved to ensure communications are available close to the work areas. Alarm systems capable of promptly warning every person underground are provided and maintained in
- operating condition. If persons are assigned to work areas beyond the warning capabilities of
- the system, provisions will be made to alert them in a proper manner to provide for their safe
- evacuation. Typically, these provisions include a flashing light capable of being seen easily. As
- part of the preoperational inspection, prior to initiating waste handling operations underground,
- waste handling personnel verify that underground communications are ready and are working. If
- they are not working, repairs are initiated.
- Renewal Application Attachment D, Table D-2, *Emergency Equipment Maintained at the Waste*
- *Isolation Pilot Plant,* describes the capabilities and locations of the various internal
- 41 communication systems.
- 42 D1-1a(2) External Communications
- 43 The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.32(b)) require that a
- 44 communications device be available for contacting outside agencies for emergency assistance.

- 1 In addition, 20.4.1.500 NMAC (incorporating 40 CFR §264.34(b)) requires that if just one
- 2 employee is on the premises, the employee must have immediate access to a device capable of
- 3 summoning outside help. Transuranic mixed waste handling operations are not conducted at
- 4 the WIPP facility when only one person is on the premises; TRU mixed waste handling
- 5 operations are conducted by two or more persons. The security officers and staff from Facility
- 6 Operations are also present at the WIPP facility during TRU mixed waste handling operations.
- 7 When no TRU mixed waste handling operations are being conducted at the WIPP facility, at a
- 8 minimum, the security officers and staff from Facility Operations are present. As discussed
- below, the WIPP facility is equipped with the required external communication devices, and the
- 10 Permittees operate the facility in a manner that complies with these regulations.
- 11 The external communication systems, designed to provide two-way communication with outside
- agencies or for summoning emergency assistance from off site, include the commercial
- telephone system, mobile phones, and two-way radios.
- Direct dialing through any telephone located above or below ground allows contact with outside agencies. Failure of a single telephone station does not affect the balance of the telephone system. Sixty percent of the direct-dial incoming and outgoing lines are routed via a microwave system. The remaining 40 percent of the direct-dial lines are routed to Carlsbad by means of a buried cable. In the unlikely event that both routing modes are inoperable, direct dial telephone capability still exists via cellular telephone or Satellite Communications linkage in the
- 20 Emergency Operations Center.
- 21 Plant radio stations in the Guard and Security Building and in the Emergency Operations Center
- in the Safety and Emergency Services Building allow two-way radio communication with the
- 23 CMR, the Eddy County and Lea County Sheriff's Departments, and the New Mexico State
- Police. Communication is available with the Lea County Sheriffs' Department, the Hobbs Fire
- 25 Department, the Carlsbad Medical Center, and the Lea Regional Medical Center via the Eddy
- 26 County dispatcher. Another base station is in the CMR; however, it is not normally used to
- communicate with off-site agencies. Radios are not inspected; they are operated daily and
- repaired if they fail.
- 29 Renewal Application Attachment D, Table D-2, *Emergency Equipment Maintained at the Waste*
- 30 Isolation Pilot Plant, describes the capabilities and locations of the various external
- 31 communication systems.

32 D1-1a(3) Emergency Equipment

- A variety of equipment is available at the WIPP facility for emergency response, containment,
- and cleanup operations. This includes equipment for spill control, fire control, personnel
- ³⁵ protection, monitoring, first aid and medical attention, communications, and alarms. This
- 36 equipment is immediately available to emergency response personnel. A listing of major
- emergency equipment available at the WIPP facility, as required by 20.4.1.500 NMAC
- (incorporating 40 CFR §264.52(e)), is shown in Renewal Application Attachment D, Table D-2.
- Table D-2 also includes the location and a physical description of each item on the list along
- 40 with a brief outline of its capabilities. The fire-water distribution system map is show in Renewal
- 41 Application Attachment D, Figure D-5, *Fire-Water Distribution System*. Equipment specified at
- the locations listed in Table D-2 are inspected in accordance with the inspection schedule
- 43 specified in Renewal Application Attachment E, *Inspection Schedule, Process and Forms,* Table

E-1, *Inspection Schedule/Procedures,* as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.52(e)).

3 <u>D1-1a(4) Fire Suppression Systems</u>

4 The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.32(d)) require that the WIPP facility be equipped with water at an adequate volume and pressure to supply water-hose 5 streams, foam-producing equipment, automatic sprinklers, or water-spray systems. The 6 following discussion pertaining to fire suppression systems at the WIPP facility demonstrates 7 the Permittees' commitment to comply with this requirement. The WIPP facility fire-water supply 8 and distribution system consists of a water tank, two fire pumps (consisting of a primary and a 9 backup), a pressure maintenance jockey pump, and a loop yard piping distribution system. The 10 system installation is in accordance with the appropriate editions of the NFPA 20, Standard for 11 the Installation of Stationary Pumps for Fire Protection, NFPA 22, Standard for Water Tanks for 12 Private Fire Protection, and NFPA 24, Standard for the Installation of Private Fire Service Mains 13 14 and Their Appurtenances, and NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems. 15

16 The domestic and fire suppression water supply for the WIPP facility is through a subsurface water pipeline system from the Carlsbad Municipal Water System. The 24-inch (in) (61-17 centimeter [cm]) diameter gravity-flow pipeline was designed to deliver 375 gallons per minute 18 (gpm) to the WIPP facility from wells located 30 miles (mi) (48.3 kilometers [km]) north of the 19 20 facility. This line is sized to provide 6,000 gallons (gal) (22,712 liters [L]) per minute for use by others, in addition to the peak flow rate required by the WIPP facility. The WIPP facility has 21 priority over flows to all other users. An agreement with the City of Carlsbad to provide 22 uninterrupted water service is effective for 100 years from June 15, 2009. 23 A 10-in (25-cm) diameter pipeline supplies water by gravity flow from the tie-in point to the WIPP 24 facility. The water line parallels the west side of Louis Whitlock Road, turns east towards the

25 26 facility, and comes above ground between two 180,000-gal (681,372-L) above ground water storage tanks. These are designated as the south Fire Water Storage Tank and the north 27 Domestic Water Storage Tank¹. The tanks are designed and fabricated in accordance with 28 National Fire Protection Association NFPA 22. Standard for Water Tanks for Private Fire 29 Protection. A city-owned flow meter, located where the water line turns east, is the system 30 boundary for the raw water supply. The water line contains an isolation valve, two ultrasonic 31 flow transducers, a relief valve and an automatic flow control valve. The latter two components 32 33 are located inside the WIPP facility security fence. At the request of the city, the flow control valve is adjusted to maintain a flow rate of approximately 100 gpm during normal filling 34 operations. Although each storage tank has a capacity of 180,000 gal, the Domestic Water 35 Storage Tank contains an internal standpipe that allows only 80,000 gal of stored water for 36 37 domestic use.

- 38 Operationally, the Fire Water Storage Tank and the Domestic Water Storage Tank are isolated
- 39 from each other. If needed in an emergency, however, a piping connection between the two
- 40 tanks can be completed.

¹ The Permittees maintain a minimum volume of 72,180 gal to ensure that the required flowrate can be supplied to the Waste Handling Building for 90 minutes, based on the sprinkler design area and the bounding flow rate per the requirements of NFPA 13 and the fire protection code of record.

1 The fire-water supply system receives its normal water supply from the Fire Water Storage

- 2 Tank. The tank is configured to supply two fire-water pumps in parallel, flowing water into a
- 3 common supply header shared by both fire pumps. Each fire-water pump is rated at 1,500 gal
- 4 (5,678 L) per minute at 125 pounds (**Ib**) (56.7 kilograms [**kg**]) per square in. The fire pumps are
- 5 configured to start on demand via a drop in pressure from the fire-water main. This drop in
- 6 pressure may be activated either by the opening of a fire hydrant or by the activation of a
- 7 sprinkler system. The primary fire pump is an electric-motor-driven pump, and the backup pump
- is a diesel-engine-driven pump. Each pump is tested to verify it can deliver at least 490 gpm at
- 9 least 120 lb per square inch gauge.

The fire pumps can discharge through a pipeline exiting the pump house via the discharge piping cross-connect. The yard compound-loop distribution system serves the areas of the

- facility by supplying fire water to the structures containing a sprinkler system and to the fire
- hydrants, located at approximately 300-ft intervals throughout the facility. The system contains
- numerous control valves that are used to isolate sections of the fire line; these control valves
- 15 are normally locked open.
- 16 The following buildings are connected to and protected by the wet-pipe sprinkler system: the

Pumphouse, the Guard and Security Building, the Support Building, the WHB, the Exhaust Filter

Building, the TRUPACT Maintenance Building, the Engineering Building, the Safety and

19 Emergency Services Building, the Training Building, the surface Hazardous Waste Staging

- Areas, the Exhaust Shaft Filter Building, the New Filter Building, and several other warehouse
- and maintenance buildings. The physical layout of the facilities allows for full hose stream
- access by firefighters. There is no firefighting water-supply system underground. Instead, the
- underground is equipped with fire extinguishers of various types and in various locations
 (including vehicles) and a fire truck with a 125-lb (56.7-kg) chemical extinguisher. The
- underground fuel station is equipped with an automatic, 1,000-lb (453.5-kg) chemical
- extinguishing system. Only dry chemical materials or water are used to fight fires involving TRU
- 27 mixed waste.

28 D1-1b Aisle Space Requirement

The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.35) require that a facility

30 maintain sufficient aisle space to allow the unobstructed movement of personnel, fire protection

equipment, spill control equipment, and decontamination equipment to areas of the facility

32 during an emergency (other than permanently-disposed stacks of TRU mixed waste). Aisle

33 space for each regulated unit is described below.

Waste Handling Building Container Storage Unit (WHB Unit) and Parking Area Container Storage Unit (Parking Area Unit)

36 During TRU mixed waste handling operations, sufficient room is maintained for unobstructed

37 movement of personnel, fire-protection equipment, spill control equipment, or decontamination 38 equipment to areas in the WHB Unit

- sequipment to areas in the WHB Unit.
- 39 Waste containers will remain inside the contact-handled (**CH**) or remote-handled (**RH**) packages
- in the Parking Area Unit (**PAU**) until TRU mixed waste handlers are prepared to handle them.
- 41 As shown in Renewal Application Attachment M, Figure M-1, there is ready access to all areas
- 42 within the WHB Unit where hazardous wastes are handled. Waste containers are unloaded from
- the CH package in the WHB Unit (see Figure M-37 in Renewal Application Attachment M). The

- 1 WHB Unit is equipped to unload up to four CH packages at one time. Single RH TRU mixed
- 2 waste canisters are unloaded from the RH-TRU 72-B casks in the Transfer Cell of the WHB Unit
- 3 where they are transferred to Facility Casks (see Figures M-29 and M-34 in Renewal
- 4 Application Attachment M). Remote-handled TRU mixed waste drums in a CNS 10-160B cask,
- 5 which may contain up to ten 55-gal drums configured in two five-drum baskets (see Figure M-31
- 6 in Renewal Application Attachment M), are unloaded from the CNS 10-160B cask in the Cask
- 7 Unloading Room and transferred into the Hot Cell.
- 8 Written procedures ensure that loaded CH or RH packages, facility pallets, containment pallets,
- and waste containers in the WHB Unit and PAU are managed in a manner to prevent
- obstructing the movement of personnel, fire-protection equipment, spill-control equipment, and
- 11 decontamination equipment.

For CH TRU mixed waste, an aisle space of at least 44 in (1.1 meters (m)) between loaded 12 facility or containment pallets is maintained in CH TRU mixed waste storage areas of the WHB 13 14 Unit to allow the movement of personnel, fire-protection equipment, spill-control equipment, and decontamination equipment. For RH TRU mixed waste, a minimum of 44 in (1.1 m) between 15 loaded casks in the RH Bay is maintained. A maximum of two loaded casks may be stored in 16 the RH Bay at one time. Implementation of written procedures ensures that loaded casks and 17 transfer cars are managed in the RH Bay in a manner to allow the movement of personnel, fire-18 protection equipment, spill-control equipment, and decontamination equipment. Within the Hot 19 Cell, waste containers are not stored in multiple rows; similarly, within the Transfer Cell, the 20 canister is located in a rack on the Transfer Cell Shuttle Car. Thus, aisle space does not apply 21 22 to these areas. Aisle space requirements also do not apply to empty 72B casks staged in racks. When CH or RH packages contain waste in the PAU, the Permittees shall maintain a minimum 23 spacing of 4 ft (1.2 m) between trailers loaded with CH or RH packages to allow the movement 24 of personnel, fire protection equipment, spill-control equipment, and decontamination 25 equipment. 26

27 <u>Underground Hazardous Waste Disposal Units (HWDUs)</u>

The mined areas underground are maintained to provide access to the repository and to the 28 face of the waste disposal areas in the active panels. As specified in 30 CFR Part 57, adequate 29 access is provided for movement of personnel, fire equipment, or spill-controlled equipment to 30 any area of operations during an emergency or response action, as provided in Renewal 31 Application Attachment D. Waste emplacement occurs sequentially on a room-by-room basis as 32 33 discussed in Renewal Application Attachment A2, Geologic Repository. Derived waste is emplaced in the disposal rooms along with the TRU mixed waste. Once panel closure has been 34 initiated, access is no longer provided beyond the panel closure barrier to closed HWDUs. 35 Proper airflow distribution to the underground areas is achieved through a multi-step process. 36

Tests and balances of the underground ventilation system are conducted on a periodic basis with the frequency depending on changes that are occurring in the configuration of the

- ³⁹ underground. These tests and balances physically measure airflow, pressure, and system
- resistance. Computer modeling is performed to determine the configuration necessary to
- 40 achieve desired underground airflow distribution. The Permittees use administrative procedures
- 42 as the means of assuring control of the configuration of the ventilation control devices (e.g.,
- 43 bulkheads, doors, fans, and air regulators) needed to achieve the desired configuration.
- 44 Underground Facility Operations makes daily checks of air quality in the parts of the repository

1 where personnel are working. Air quality checks are made on an as-needed basis as changing 2 conditions warrant such checks.

3 D1-2 Preventive Procedures, Structures, and Equipment

4 The WIPP facility has been designed and is operated to meet each of the requirements of

5 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(8)) to prevent hazards associated with

6 unloading operations, prevent runoff from hazardous waste handling areas, prevent

contamination of water supplies, mitigate the effects of equipment and power failures, prevent
 undue exposure of personnel to hazardous waste, and prevent releases to the atmosphere as

9 discussed below.

10 D1-2a Unloading Operations

The Permittees' equipment, structures, and procedures at the WIPP facility are specially
designed for the safe handling of TRU mixed waste. Renewal Application Attachments A1, *Container Storage*, and A2, *Geological Repository*, detail how CH and RH TRU mixed waste is
handled, including unloading and transport operations. The following is a summary of the
activities, structures, and equipment that were developed to prevent hazards in unloading of
TRU mixed waste, as required by 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(8)(i)).

17 CH TRU Mixed Waste

The TRUPACT-II shipping container has a gross loaded weight of 19,265 lb (8,737 kg). The 18 HalfPACT shipping container has a gross loaded weight of 18,100 lb (8,210 kg). The gross 19 loaded weight is defined as the weight of the payload and the weight of the CH package itself. 20 The CH packages have forklift pockets at the bottom of the container specifically for lifting the 21 22 container with a forklift (see Figure M-17 and Figure M-18 in Renewal Application Attachment M). The 13-ton (11.8-metric ton) electric forklift unloads the TRUPACT-II from the trailer and 23 transfers it to an unloading dock in the WHB Unit. The unloading dock is designed to 24 25 accommodate the CH package and functions as a work platform, providing TRU mixed waste handling and health physics personnel with access to the shipping container contents during 26 27 unloading operations.

An overhead 6-ton (5.4-metric ton) crane and adjustable center-of-gravity lift fixture transfer 28 TRU mixed waste containers from the CH package to a facility pallet on the WHB Unit floor. The 29 30 facility pallet (see Renewal Application Attachment M, Figure M-21) is a fabricated steel structure designed to securely hold waste containers. Each facility pallet has a rated load 31 capacity of 25,000 lb (11,340 kg). The upper surface of the facility pallet has two recesses sized 32 to accept the waste containers, ensuring that the containers are held in place. Up to four 33 standard waste boxes, four seven-packs of 55-gallon drums, four four-packs consisting of 85-34 gallon drums, four three-packs of 100-gallon drums, two three-packs of Shielded Containers, 35 one standard large box 2, or two ten-drum overpacks may be placed on a facility pallet. Each 36 stack of waste containers is strapped down to holding bars in the top reinforcement plate of the 37 38 facility pallet to avoid spillage during movement. Two rectangular forklift pockets in the bed allow the facility pallet to be securely lifted by forklift. In order to assure a facility pallet is not 39 overloaded, operationally it will hold the contents of two CH packages, as discussed in Renewal 40

41 Application Attachment A1.

- 1 The Permittees have the capability to handle each of the CH TRU containers singly using
- 2 forklifts and single container attachments. In such cases, the container would be loaded on a
- facility pallet, loaded onto the waste shaft conveyance, and moved underground as a single unit.
- 4 Unloading equipment is inspected in accordance with the schedule shown in Renewal
- 5 Application Attachment E, Tables E-1 and E-1a. Cranes that are used in the unloading and
- 6 handling of TRU mixed waste have been designed and constructed so that they will retain their
- 7 loads in the event of a loss of power. Cranes in the WHB Unit are also designed to withstand a
- 8 design basis earthquake without moving off their rails and without dropping their load. The
- 9 following is a summary of the activities, structures, and equipment that were developed to
- 10 prevent hazards in transporting TRU mixed waste.
- 11 Palletized CH TRU mixed waste is either transferred by a 13-ton (11.8-metric ton) forklift or the
- 12 facility transfer vehicle, which is designed with an adjustable bed height that is used to transfer
- the facility pallets to the special pallet-support stands in the Waste Shaft Conveyance.
- 14 The Waste Hoist system in the Waste Shaft and Waste-Shaft furnishings are designed to resist
- the dynamic forces of the hoisting system, which are greater than the seismic forces on the
- underground facilities. In addition, the Waste Shaft Conveyance headframe is designed to
- 17 withstand the design-basis earthquake. Maximum operating speed of the hoist is 500 ft (152.4
- m) per minute. During loading and unloading operations, the Waste Hoist is steadied by fixed
- 19 guides. The Waste Hoist is equipped with a control system that will detect malfunctions or
- abnormal operations of the hoist system, such as overtravel, overspeed, power loss, or circuitry
- failure. The control response is to annunciate the condition and shut the hoist down. Operator response is required to recover from the automatic shutdown. Waste Hoist operation is
- response is required to recover from the automatic shutdown. Waste Hoist operation is continuously monitored by the central monitoring system (**CMS**). A battery powered
- transmitter/receiver allows communication between the hoist conveyance and the hoist house.
- 25 The Waste Hoist has two pairs of brake calipers acting on independent brake paths. The hoist
- 26 motor is normally used for braking action of the hoist. The brakes are used to hold the hoist in
- 27 position during normal operations and to stop the hoist under emergency conditions. Each pair
- of brake calipers is capable of holding the hoist in position during normal operating conditions
- and stopping the hoist under emergency conditions. In the event of power failure, the brakes will
- 30 set automatically.
- The hoist is protected by a fixed automatic fire suppression system. Portable fire extinguishers are also provided on the hoist floor and in equipment areas.
- 33 Once underground, the facility pallet is removed from the hoist cage by the underground
- transporter (see Figure M-46 in Renewal Application Attachment M), a commercially available
- articulated diesel vehicle. The transporter is designed specifically for transporting palletized
- 36 TRU mixed waste and is sized to accommodate the facility pallet. Motorized waste handling
- equipment is equipped with fire-suppression equipment or, for diesel-fueled equipment, on-
- board automatic fire-suppression systems. In addition, the underground transporter is equipped
- 39 with rupture-resistant diesel fuel tanks, and reinforced fuel lines to minimize the potential for a
- fire involving the fuel system. Waste containers are placed into underground HWDUs using a
- 41 forklift and attachments.
- Contact-handled TRU mixed waste transport equipment is inspected at a frequency indicated in
 Renewal Application Attachment E, Table E-1.

1 RH TRU Mixed Waste

- Cranes and forklifts that are used to unload and handle RH TRU mixed waste have been
 designed and constructed to retain their loads in the event of a loss of power. RH TRU mixed
- 4 waste received in an RH-TRU 72-B cask is unloaded from the trailer in the RH Bay, using the
- 5 RH Bay Overhead Bridge Crane, and is placed on the Cask Transfer Car. The Cask Transfer 6 Car moves the RH-TRU 72-B cask into the Cask Unloading Room, where a bridge crane lifts
- the cask from the Cask Transfer Car and lowers it into the Transfer Cell and onto the Transfer
- 8 Cell Shuttle Car. The Transfer Cell Shuttle Car moves the RH-TRU 72-B cask into position for
- 9 transferring the canister to the Facility Cask.
- 10 Remote-handled TRU mixed waste received in a CNS 10-160B cask is unloaded from the trailer
- in the RH Bay using the RH Bay Overhead Bridge Crane and is placed on the Cask Transfer
- 12 Car. The Cask Transfer Car moves the CNS 10-160B cask into the Cask Unloading Room. The
- 13 Hot Cell crane lifts the two drum carriage units from the CNS 10-160B cask in the Cask
- 14 Unloading Room into the Hot Cell, where the drums are transferred into RH TRU mixed waste
- 15 Facility Canisters using the Overhead Powered Manipulator or Hot Cell Crane. The Facility
- 16 Canisters are then lowered into a shielded insert on the Transfer Cell Shuttle Car in the Transfer
- 17 Cell. The Transfer Cell Shuttle Car moves the shielded insert into position for transferring the
- 18 Facility Canister to the Facility Cask.
- A remotely operated fixed grapple hoist lifts the canister from the RH-TRU 72-B cask or from the
- 20 shielded insert on the Transfer Cell Shuttle Car and transfers the canister into the Facility Cask
- 21 located on the Facility Cask Transfer Car in the Facility Cask Loading Room. The Facility Cask
- is rotated to a horizontal position on the Facility Cask Transfer Car, and the Facility Cask
- 23 Transfer Car moves onto the Waste Shaft Conveyance and is lowered underground.
- 24 Once underground, the RH TRU mixed waste handling forklift lifts the Facility Cask from the
- 25 Facility Cask Transfer Car and carries the Facility Cask to the Horizontal Emplacement Machine
- 26 (**HEM**). After placing the Facility Cask on the HEM, the canister is emplaced in the wall of the
- 27 disposal room.
- 28 Pertinent RH TRU mixed waste transport equipment is inspected at a frequency indicated in
- 29 Renewal Application Attachment E, Table E-1a, *RH TRU Mixed Waste Inspection*
- 30 Schedule/Procedures.
- 31 Figures of RH TRU mixed waste emplacement equipment are included in Attachment M.
- 32 D1-2b Runoff
- 33 The following description of procedures, structures, or equipment used at the WIPP facility to
- 34 prevent runoff from TRU mixed waste handling areas to other areas of the facility or
- environment or to prevent flooding is required by 20.4.1.900 NMAC (incorporating 40 CFR
- 36 §270.14(b)(8)(ii)).
- 37 The WHB Unit is a physical barrier that will prevent TRU mixed waste releases from reaching
- the environment before a cleanup could be initiated and completed. A detailed description of the
- 39 WHB containment capability for the CH Bay and RH Complex is contained in Renewal
- 40 Application Attachment A1. Secondary containment is also provided by the shipping containers

1 while waste containers are within them. These are sealed vessels with no open vents and 2 therefore cannot leak.

TRU mixed waste received for emplacement at the WIPP facility must meet the Treatment. 3 Storage, and Disposal Facility Waste Acceptance Criteria (TSDF-WAC) as non-liquid waste; the 4 TSDF-WAC allows up to one percent observable liquids. The TSDF-WAC are procedural 5 controls that must be met at the generator or storage site, and the data must be verified by the 6 Permittees prior to acceptance and shipment to the WIPP facility. Renewal Application 7 Attachment C, Waste Analysis Plan, contains information regarding TSDF-WAC requirements 8 for shipping and discusses receipt and verification of the TRU mixed waste at the WIPP facility. 9 Calculations in Renewal Application Attachment A1 demonstrate that one percent observable 10 liquid in TRU mixed waste containers is easily contained by the WHB Unit concrete floor. 11

The WIPP facility does not lie within a 100-year floodplain. There are no major surface-water 12 bodies within 5 mi (8 km) of the site, and the nearest river, the Pecos River, is approximately 12 13 14 mi (19 km) away. The general ground elevation in the vicinity of the surface facilities (approximately 3,400 ft [1,036 m] above mean sea level) is about 500 ft (152 m) above the 15 riverbed and 400 ft (122 m) above the 100-year floodplain. Protection from flooding or ponding 16 caused by probable maximum precipitation (PMP) events is provided by the diversion of water 17 away from the WIPP facility by a system of peripheral interceptor berms and dikes. Additionally, 18 grade elevations of roads and surface facilities are designed so that storm water will not collect 19 on the site under the most severe conditions. 20

Repository shafts are elevated at least 6 in (15.2 cm) to prevent surface water from entering the shafts. The floor levels of the surface facilities are above the levels calculated for local flooding due to PMP events. Therefore, flooding of WIPP facility roads and surface structures is not expected from the flooding of surface waters as a result of PMP events or because of site-runoff design.

Flood-control structures are inspected as part of a general facility inspection at least annually.

During this inspection, the structures are checked to assure there has been no wind or rain erosion or animal-caused damage that would cause the structures to fail. Further, the areas

around the structures are inspected to ensure they are free of vegetation, debris, or other items

30 that would impede the diversion of water. Experience with these structures has shown that

annual structural inspections are adequate for the climate and soil conditions at the WIPP

facility; however, inspections are also conducted after severe natural events, such as severe

33 storms and a design basis earthquake.

Whenever TRU mixed waste is outside the WHB Unit, it is contained in CH or RH packages. Transuranic mixed waste containers are only unloaded from the shipping containers inside the WHB Unit and shipping containers are never opened by the Permittees outside the WHB Unit; therefore, TRU mixed waste is not expected to reach the outside environment or other parts of the facility from the TRU mixed waste handling facilities in non-flood circumstances. Flooding of the TRU mixed waste handling facilities is prevented by drainage ditches and berms such that

40 there is no mechanism that might transport TRU mixed waste to the outside environment and

between parts of the WIPP facility. Neither is there a mechanism to allow TRU mixed waste to

42 find its way to an area of the WIPP site where it would be carried off site by flood or precipitation

43 waters.

1 D1-2c Water Supplies

At the WIPP facility, water supplied by the Carlsbad Municipal Water System enters a pair of 180,000-gal (681,372-L) aboveground storage tanks located adjacent to the Pumphouse. The 360,000-gal (1,362,744-L) combined capacity of the tanks is used as the source for both potable and fire-control water. These tanks are 32 ft (9.8 m) in diameter and are constructed of welded steel. The water level in each tank is inspected daily. Potable water is piped to the site and stored in tanks until distributed by pipe to the fire hydrants and buildings. Managing the potable water supply in this manner prevents the contamination of the supply by TRU mixed waste.

9 D1-2d Equipment and Power Failure

The following description of procedures, structures, or equipment used at the facility to mitigate effects of equipment failure and power outages is required by 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(8)(iv)). The specific systems and facilities related to the protection of human health and the environment during waste handling and management operations are discussed in Renewal Application Attachment A1, *Container Storage*.

15 Utility power is fed to the WIPP site by two separate feeds in a ring bus configuration. This

provides the capability to supply uninterruptible, redundant power to the site upon the loss of

one feed. In the event that normal utility power is lost, on-site diesel generators will provide

alternating current (**AC**) power to preselected WIPP facility electrical loads.

19 Uninterruptible power supply (**UPS**) units are also online, providing power to important

20 monitoring systems. The utility substation at the WIPP facility is located east of the property

21 protection area. Area substations are located at various surface facilities. Underground

22 conduits, cable duct banks, and buried cables connect the facility substation with area

23 substations.

24 If utility power fails, the exhaust filter system high-efficiency particulate-air filter dampers are

25 placed into filtration position. TRU mixed waste handling and related operations cease upon

loss of utility power and are not resumed until normal utility power is returned. Waste handling

equipment will "fail safe," meaning that it will retain its load during a power outage.

In case of a loss of utility power, backup power to preselected electrical loads can be supplied 28 by either of the two on-site diesel generators. Each of these units provides 480 volts (V) of 29 30 power with a high degree of reliability and is sized to feed the selected loads. Each of the diesel generators can carry the preselected monitoring loads plus operation of the Air Intake Shaft 31 hoist for personnel evacuation and other selected backup loads. The preselected electrical 32 loads include such items as communications systems, continuous air monitors, Air Intake Shaft 33 conveyance (if necessary) for underground evacuation, WHB cranes, WHB fans, and 34 underground exhaust fans (note this is not an all-inclusive list). The diesel generators can be 35 brought online within 30 minutes and are conservatively estimated to be running at load within 36 60 minutes. 37

³⁸ Upon loss of normal power, the diesel generators are manually started from the local control

³⁹ panel or from the CMR. The standard practice is to start the diesel generators from the local

- 40 control panel. The diesel generators and associated breakers can be monitored in the CMR,
- thus providing the ability to feed selected facility loads from the backup power source, in
- 42 sequence, without exceeding generator capacity. The onsite total fuel storage capacity is

1 sufficient for the operation of one diesel generator at full load for one day, and additional fuel

- supplies are readily available within a few hours by tank truck, allowing online refueling and
 continued operation.
- 4 The Central UPS, located in the Support Building, provides transient free, reliable 120/208 V of alternating current power to essential loads. This ensures continuous power to the radiation 5 detection system for airborne contamination and area radiation monitoring, local processing 6 units (LPUs), computer room, and CMR even during the interval between the loss of offsite 7 power and initiation of backup diesel generator power. Additional UPSs provide transient free 8 power to strategically located LPUs for the radiation monitoring system on the surface, the 9 Safety and Emergency Services Building, the Guard and Security Building, in selected areas in 10 the Exhaust Shaft, and in underground passages and waste disposal areas. 11
- In case of loss of AC power input to the UPSs, the dedicated batteries were designed to supply power to a fully loaded UPS for at least 30 minutes. It is expected that the AC power input to the
- 14 UPS will be brought online within 30 minutes, either from the off-site electric utility or from the 15 site back-up power generator system.
- Human health and the environment are protected during a loss of off-site power by acombination of factors:
- The underground filtration system fails in the "filter" mode so that no releases of
 contaminated particulates will occur
- The UPS maintains monitoring systems and alarms in waste handling areas so that fires or pressure loss will be detected and an appropriate response initiated
- Generators are brought online within 30 minutes; once the generators are loaded,
 hoisting can be initiated so that personnel do not have to stay underground for extended
 lengths of time
- Decisions to evacuate underground personnel will be made in accordance with the requirements of MSHA, as reflected in Renewal Application Attachment D
- The waste hoist brakes set automatically so that loads do not fall
- Cranes retain their loads so that spills do not occur from dropped containers
- Communication systems are maintained
- The emergency operations center is powered if it is needed

The CMS is a computerized system that collects, records, and displays data for all critical facility systems. The system is designed to provide a centralized, integrated location for collecting, monitoring, and storing facility parameters and is informed from signals provided by the seismic, meteorological, radiological effluent, and fire detection and alarm systems. Additionally, the CMS monitors heating, ventilation, air conditioning and electrical system status. Certain control functions of the underground ventilation fans, major facility electrical systems, and the backup diesel generators can be performed by the CMS from the CMR. The CMS can be set to alarm
 upon failure of the equipment monitored.

3 The CMS components of the WHB Unit and the Support Building are powered from the central

4 UPS. The UPS features automatic switching without a loss of power from primary power to 5 alternate power to battery backup power. The components located throughout the facility are

alternate power to battery backup power. The components located throu
 powered by various electrical switchboards with UPS battery backup.

7 The major components of the system are interconnected by means of a redundant network. The

network is the communications medium for the CMS and consists of network cables routed

9 throughout the facility. The network is designed such that no single point failure will cause

failure of the entire network. Parameters or status is monitored by LPUs strategically located

11 throughout the surface and underground facility.

In addition, a number of automatic checks are performed on the internal processes associated with system components and network communications. If any fault is detected, the system has the capability to remove a component from the network and alert the CMR Operator (**CMRO**) of the fault. The status of the network is continuously monitored by the CMRO 24 hours per day, seven days per week. If a fault occurs, the CMRO initiates an action request within the work control system to correct the problem.

18 The RH Complex is included in the WHB. The Central UPS supplies power to the WHB, which includes the RH Complex. The RH Bay, Hot Cell and Transfer Cell equipment are serviced by 19 dual 1,100 kilowatt diesel powered generators located between the Exhaust Shaft and the 20 21 WHB. The generators provide backup power to both CH and RH waste handling operations. The RH waste handling equipment is designed to stop as a result of loss of power in a fail-safe 22 23 condition. Power from the back-up generators may be utilized to place RH TRU mixed waste containers in process into a safe configuration. During a total power outage condition, selected 24 RH loads can be powered by the Central UPS. Within a short time, selected RH loads at 480 25 26 volts and below can be powered by the Backup Diesel Generators. The backup central UPS for the WHB would also supply backup power to the RH Complex. 27

28 D1-2e Personnel Protection

29 The following description of procedures, structures, or equipment used at the facility to prevent

30 undue exposure of personnel to hazardous waste is required by 20.4.1.900 NMAC

31 (incorporating 40 CFR §270.14(b)(8)(v)):

- The TSDF-WAC are criteria designed to preclude the shipment or acceptance of TRU mixed waste exhibiting the characteristics of ignitability, corrosivity, or reactivity.
- Written procedures to prevent the addition of materials to the TRU mixed waste that could exhibit incompatibility or the characteristics of reactivity and/or ignitability are discussed in Section D1-3 of this Addendum.
- TRU mixed waste handling operations are conducted so that the need for TRU mixed waste handling personnel to touch the TRU mixed waste containers during unloading, overpacking (if necessary), and emplacement operations is minimized. Appropriate personal protective equipment (PPE) is used depending on locations and operations

- 1 (e.g., steel-toed shoes, hardhat, safety glasses inside a crane-operating envelope; steel-2 toed shoes, hardhat, mine lamp, self-rescuer, and safety glasses in the Underground).
- Work authorization procedures, discussed in Renewal Application Attachment E, Section
 E-1, *Inspection Schedule*, prohibit WIPP facility personnel from utilizing TRU mixed
 waste handling equipment that is temporarily out of service and prevent inappropriate
 use of TRU mixed waste handling equipment that is not operational for all uses.
- A system for monitoring and inspecting monitoring equipment, safety and emergency systems, security devices, and operating and structural equipment is in place to prevent, detect, or respond to environmental or human health hazards caused by hazardous waste. The inspection/monitoring requirements are described in Renewal Application Attachment E.
- Adequate aisle space is maintained for emergency response purposes, as discussed in
 Section D1-1b of this addendum.
- Procedures to protect personnel from hazardous and/or TRU mixed waste during non routine events are detailed in Renewal Application Attachment D.
- The following discusses the structures and equipment that prevent undue exposures of personnel at the WIPP facility to hazardous constituents:
- The WIPP facility was sited and designed to be protective of human health and ensure safe operations during the Disposal Phase.
- TRU mixed waste containers are required to meet shipping/structural requirements.
- The shipping container, Forklifts, unloading dock, crane, facility pallets, containment
 pallets, Facility Transfer Vehicle, Waste Shaft Conveyance, and underground transporter
 were designed or selected for use in order to minimize the need for CH TRU mixed
 waste handling personnel to come into contact with CH TRU mixed waste. Each of these
 items is discussed in detail in Renewal Application Attachments A1 and A2; Section D1 2a of this addendum discusses prevention of hazards to personnel during unloading
 operations.
- The shipping containers, forklifts, cranes, cask shuttle, transfer cars, manipulators, Hot Cell, Waste Shaft Conveyance, and HEM were designed or selected for use in order to minimize the need for RH TRU mixed waste handling personnel to come into contact with RH TRU mixed waste. These items are discussed in Renewal Application Attachments A1 and A2. Section D1-2a of this addendum discusses in detail prevention of hazards to personnel during unloading operations.
- During the initial opening of CH shipping packages, the hood ventilation system is used to vent any potential release of radioactive contaminants into the WHB filtered exhaust ventilation system (Renewal Application Attachment A1).
- Differential air pressure between the RH TRU mixed waste handling locations in the RH
 Complex protects workers and prevents potential spread of contamination during

- handling of RH TRU mixed waste. Airflow between key rooms in the WHB are controlled
 by maintaining differential pressures between the rooms. The CH Receiving Bay is
 maintained with a negative pressure relative to outside atmosphere. The RH Receiving
 Bay is maintained with a positive pressure relative to the CH Receiving Bay. The RH Hot
 Cell is maintained with a negative differential pressure relative to the RH Receiving Bay.
 The Hot Cell ventilation is exhausted through high-efficiency particulate air filters prior to
 venting through the WHB filtered exhaust.
- The WIPP facility has internal and external communications and alarm systems to notify
 personnel of emergency situations and provide instructions for response, evacuation,
 etc., as discussed in Sections D1-1a(1) and D1-1a(2) of this addendum and Renewal
 Application Attachment D.
- The WIPP facility is equipped with spill-response equipment, transport vehicles, emergency medical equipment and rescue vehicles, fire detection, fire-suppression and firefighting equipment (including water for fire control), PPE, emergency lighting and backup power, and showers and eyewash fountains. These are discussed in Sections D1-1a, D1-2c, and D1-2d of this addendum and are listed in Renewal Application Attachment D, Table D-2, *Emergency Equipment Maintained at the Waste Isolation Pilot Plant*.
- The surface and underground ventilation systems, discussed in Renewal Application
 Attachment A2 are designed to provide personnel with a suitable environment during
 routine operations.

22 D1-2f Releases to Atmosphere

The following description of procedures, structures, or equipment used at the facility to prevent releases to the atmosphere is required by 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(8)(vi)).

Transuranic mixed waste is received from off-site generators in containers that are not opened 26 at the WIPP facility, thereby minimizing releases of hazardous waste constituents into the 27 atmosphere. The nature of some of the waste itself also minimizes potential releases to the 28 atmosphere. Lead and other heavy metals, which could exhibit the characteristic of toxicity, may 29 be present in some TRU mixed waste forms. The toxic metal in the TRU mixed waste, most of 30 which is lead in monolithic form, is present in bricks and shielding rather than in particulate form. 31 The primary sources of other toxic metals are sheets, rods, plating, equipment parts, or 32 solidified sludges. 33

Containers of TRU mixed waste are required to contain one or more filtered vents to prevent internal pressurization due to radiolytic gas generation. While these vents prevent the release of radioactive particulates, volatile organic compounds (**VOCs**) diffuse across the filters and are released into the air. The VOC monitoring plan described in Renewal Application Attachment N is used to confirm that there are no adverse effects on human health and the environment.

1 D1-2g Flammable Gas Concentration Control

2 Gas concentrations in the mine and around the underground HWDUs are controlled by

- 3 mechanically induced ventilation. The underground ventilation system is described in
- 4 Attachment A2.
- 5 The WIPP Mine Ventilation Plan is updated as needed to accommodate changing underground
- 6 conditions. Minimum requirements for air quantity, quality, and airflow velocity depend on the
- 7 level of activity in a given area and are governed by the MSHA regulations (30 CFR Part 57,
- 8 Subpart G).
- 9 Monitoring and/or testing the air quality is performed in the underground. The tests are
- 10 conducted on an as-needed basis, in areas where chemicals are stored, and in areas where
- people are working that may contain hazardous concentrations of airborne fumes, mists, or
- 12 vapors. Air quality surveys are recorded; records contain location, time, job description, or
- 13 occurrences associated with the contaminants, and the identification of instruments used.
- 14 Underground air-quality checks are performed on a daily basis in open drifts utilizing
- instrumentation, which indicates oxygen, carbon monoxide, and flammable gas concentration.
- 16 The results of the monitoring are entered into an underground air-quality round sheet. If
- 17 conditions are found that exceed established criteria, additional notification is made to the CMR.
- Appropriate actions are taken to determine the type of gases and impact on mine activities. The
- readings taken during specific tests for unusual conditions are recorded in the underground air-
- 20 quality round sheet. This monitoring is performed in accordance with MSHA (30 CFR Part 57).

21 Portable air monitoring equipment is used to assure access to areas where air quality may be of 22 concern. Two types of measuring systems are used at the WIPP facility: pump systems and portable air monitoring instruments. Prior to use, instruments must have certification of current 23 calibration and check gases must be certified as accurate within one percent of the label 24 concentration. Instruments are used within the guidelines established by the manufacturers and 25 are accompanied with suitable temperature, barometric and relative humidity measurements (as 26 required). Functional testing of instruments must be done before each use and the results must 27 fall within the ranges specified in air monitoring procedures. Gases that may be tested include 28 oxygen, methane, carbon monoxide, hydrogen sulfide, sulphur dioxide, nitrogen dioxide, and 29 chlorine. Alarm levels are set for each gas. Typical settings are as follows: O_2 : 19.5% LOW; 30 31 23.0% HIGH; CH₄: 0.25%; CO: 25 parts per million (**ppm**); H₂S: 10 ppm; SO₂: 2 ppm; NO₂: 1 ppm; Cl₂: 0.5 ppm. When alarm levels are reached, Industrial Safety is contacted to evaluate the 32 conditions and to determine the appropriate actions. Equipment operation is by trained 33 personnel only, or under the supervision of trained personnel. Air quality sampling is performed 34 as often as needed to assure safe working conditions. If conditions are worsening, or action has 35 been taken to mitigate high levels of contamination, the frequency of measurement is increased. 36 Underground air quality is checked at the beginning of the day when personnel are 37

38 underground.

39 D1-3 Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste

40 The regulations at 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(9)) require a description

- of precautions taken to prevent accidental ignition or reaction of ignitable, reactive, or
- incompatible TRU mixed waste as required to demonstrate compliance with 20.4.1.900 NMAC
- 43 (incorporating 40 CFR §270.15(c)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.17). The

- 1 Permittees achieve compliance with these regulations by ensuring the TRU mixed waste
- 2 (including the container) received at the WIPP facility during the Disposal Phase, and any
- 3 derived TRU mixed waste generated at the facility, have been demonstrated to be compatible
- and do not exhibit the characteristics of ignitability, reactivity, or corrosivity.

ATTACHMENT E

INSPECTION SCHEDULE, PROCESS AND FORMS

ATTACHMENT E

INSPECTION SCHEDULE, PROCESS AND FORMS

TABLE OF CONTENTS

Introdu	iction			3
E-1	Inspec	ction Sched	lule	3
			nspection Requirements	
		E-1a(1)	Types of Problems	6
			Frequency of Inspections	
		E-1a(3)	Monitoring Systems	6
	E-1b	Specific F	Process Inspection Requirements	7
		E-1b(1)	Container Inspection	7
		E-1b(2)	Miscellaneous Unit Inspection	8
Refere	nces			9

1		LIST OF FIGURES
2	Figure	Title
3 4 5	Figure E-1 Figure E-2	Typical Inspection Checklist Typical Logbook Entry
6		LIST OF TABLES
7	Table	Title
8 9 10	Table E-1 Table E-1a Table E-2	Inspection Schedule/Procedures RH TRU Mixed Waste Inspection Schedule/Procedures <u>Monitoring Schedule</u>

11

ATTACHMENT E

1 2

INSPECTION SCHEDULE, PROCESS AND FORMS

3 Introduction

4 This Permit Attachment describes the facility inspections (including container inspections) that 5 are conducted to detect-malfunctions, deterioration, operator errors, and discharges that may

6 cause or lead to releases of hazardous waste or hazardous waste constituents to the

7 environment or that could be a threat to human health malfunctions and deterioration, operator

8 errors, and discharges which may be causing—or may lead to—(1) release of hazardous waste

- 9 constituents to the environment or (2) a threat to human health, in accordance with 20.4.1.500
- 10 New Mexico Administrative Code (NMAC) (incorporating Title 40 of the Code of Federal
- 11 <u>Regulations (CFR) §264.15(a))</u>.

12 E-1 Inspection Schedule

13 Equipment instrumental in preventing, detecting, or responding to environmental or human

health hazards, such as monitoring equipment, safety and emergency equipment, security

devices, and operating or structural equipment are inspected. The equipment will be inspected

16 for malfunctions, deterioration, potential for operator errors, and discharges which could lead to

17 a release of hazardous waste constituents to the environment or pose a threat to human health.

18 The WIPP facility has Permittees have developed and will maintain a series of written

19 procedures that include all the detailed inspection procedures and forms necessary used to

20 comply with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)), during the Disposal Phase.

Tables E-1 and E-1a list each item or system requiring inspection under these regulations, the

inspection frequency, the organization responsible for the inspection, the applicable inspection

procedure, and what to look for during the inspection. <u>The regulations at 20.4.1.500 NMAC</u>

(incorporating 40 CFR §§264.15(b), 264.174, and 264.602) list requirements that are applicable

to the <u>Waste Isolation Pilot Plant (WIPP)</u> facility. <u>Permit</u> Attachment D, Table D-2, *Emergency Equipment Maintained at the Waste Isolation Pilot Plant*, identifies the emergency equipment

and corresponding locations to be inspected in accordance with Table E-1.

28 <u>The Permittees maintain Operational operational</u> procedures detailing the inspections required

under 20.4.1.500 NMAC (incorporating 40 CFR §§264.15(a) and (b)), are maintained in

³⁰ electronic format on the WIPP computer network, in the Operating Record and, as appropriate,

in controlled document locations at the WIPP facility. Frequency of inspections is discussed in

detail in Section E-1a(2). Inspections are conducted often enough to identify problems in time to

- correct them before they pose a threat to human health or the environment and are based on
- regulatory requirements. The operational procedures assign responsibility for conducting the inspection, the frequency of each inspection, the types of problems to be watched for, what to
- do if items fail inspection, directions on record keeping, and inspector signature, date, and time.
- The operational procedures are maintained at the WIPP facility. Tables E-1 and E-1a
- summarize inspections, frequencies, responsible organizations, and the types of anticipated
- ³⁹ problems as well as the references for the operational procedures. Inspection records are
- maintained at the WIPP site-facility for three years. Beginning with the effective date of this
- Permit, records that are over the three year<u>three-year</u> retention period are either maintained at
- 42 the WIPP site facility or transferred to the WIPP Records Archive located in Carlsbad, NM-New

- 1 Mexico until closure. The records maintained at the WIPP Records Archive are stored in
- 2 facilities that are temperature and humidity controlled especially for the long term storage of
- 3 records and readily retrievable and available for inspection.
- 4 Waste handling equipment and area inspections are typically controlled through established
- 5 procedures and the results are recorded in logbooks or on data sheets inspection forms.
- 6 Operators are trained to consult the logbook to identify the status of any <u>a</u>piece of waste
- 7 handling equipment prior to its use. Once a piece of equipment is identified to be operable, a
- 8 preoperational or pre-evolution inspection is initiated in accordance with the appropriate
- 9 inspection procedure in Tables E-1, and E-1a, or in operational procedures. Inspection results,
- as described below, are entered in the applicable logbook or inspection form.
- Inspections include identifying malfunctions or deteriorating equipment and structures.
- Inspection results and data, including deficiencies, discrepancies, or needed repairs are
- recorded. A negative inspection result does not necessarily lead to a repair. A deficiency, such
- as low fluid level, may be corrected by the inspector immediately. A discrepancy, such as an
- increasing trend of a data point, may necessitate additional inspection prior to the next
- scheduled frequency. The actions taken (corrected, additional inspection, procurement action,
- or Action Request (**AR**) for repair submitted) are recorded on the inspection form, the WIPP
- automated Maintenance maintenance Management management tracking program (CHAMPS)
- 19 work order sheet, or the equipment logbook, whichever is applicable.
- 20 Items that are operational with restrictions are operated in accordance with applicable
- 21 compensatory measures. Items that are not operational are scheduled for repair or replacement
- in accordance with work authorization procedures. In such cases, compensatory measures may
- 23 be needed until the equipment is returned to service. These compensatory measures will
- 24 provide an equivalent level of protection, be documented in WIPP facility files (e.g., equipment
- logbook<u>, inspection form</u>), and include an appropriate inspection schedule, when applicable.
- Normally, the individual inspecting the equipment/system is not qualified to make repairs and <u></u>
- 27 consequently, prepares an AR if repairs are needed. The AR is tracked by the WIPP automated
- 28 <u>maintenance management tracking program</u>CHAMPS system through the work_-control
- ²⁹ process. When parts are received and work instructions are completed, the work order can be
- 30 scheduled. The schedule is discussed daily to ensure facility configuration can support
- 31 scheduled and work items and to allocate and coordinated with other facility activities the
- 32 resources necessary<u>in order</u> to complete the items.
- Work orders are released for work by the responsible organization. When repairs are complete, the responsible organization tests the equipment to ensure the repairs corrected the problem,
- then closes out the work order, to and returns the equipment to an operational status for normal
- ³⁶ operations to resume. Implementation of these procedures constitutes compliance with
- 37 20.4.1.500 NMAC (incorporating 40 CFR §264.15(c)).
- 38 The Permittees meet the Requirements requirements of 20.4.1.500 NMAC (incorporating 40
- 39 CFR §264.15(d)), are met by performing the inspections for each item or system included in
- 40 Tables E-1 and E-1a. Beginning with the effective date of this Permit, the results of the
- inspections are maintained in the operating <u>Operating record</u> for three years and are
- then transferred to the WIPP Records Archive where they are maintained until closure. The
- inspection logs or summary records include the date and time of inspection, the name of the
- inspector, a notation of the observations made, and the date and nature of any repairs or other

remedial actions. Major pieces of waste handling equipment are inspected using proceduralized 1 2 inspections. Current copies of inspection forms are maintained in the Operating Record on file at the WIPP facility. Non-administrative changes to inspections (i.e., changes that affect the 3 frequency or content of the inspections schedules) to inspection forms must be submitted to the 4 NMED in accordance with the appropriate portions of 20 NMAC 4.1.900 (incorporating 40 CFR 5 §270.42). The status of these pieces of waste handling equipment is maintained recorded in an 6 equipment logbook that is separate from the checklist. The logbook contains information 7 regarding the condition of the equipment. Equipment operators are required, by the inspection 8 checklist, to consult the logbook regarding the status of the equipmentas the first activity in the 9 inspection procedure. This logbook is maintained in the operating Operating record Record. 10 CHContact-handled (CH) transuranic (TRU) mixed waste equipment that is controlled by a 11 logbook includes the waste handling forklifts, all-waste handling cranes, the adjustable center of 12 gravity lift fixture, the CH TRU waste underground transporter, the facility transfer vehicles, the 13 trailer jockey, the Ten-Drum Overpack (TDOP) Upender, the Payload Transfer Station, and the 14 push-pull attachment. RH Remote-handled (RH) TRU mixed waste equipment that is controlled 15 by a logbook includes the 140/25-ton RH Bay overhead bridge crane, cask transfer cars, 25-ton 16 cask unloading room crane, transfer cell shuttle car, RH Bay cask lifting yoke, facility grapple, 17 6.2- ton overhead hoist, facility cask rotating device, hot cell overhead powered manipulator, 15-18 ton hot cell crane, facility cask transfer car, 41-ton forklift, facility cask, and emplacement 19 equipment. Inspections of the Cask Unloading Room, Hot Cell, Transfer Cell, Facility Cask 20 Loading Room, and RH Bay and radiation monitoring equipment will beare recorded on data 21 sheetsinspection forms. In addition to the inspections listed in Tables E-1 and E-1a, many 22 pieces of equipment are subject to regular preventive maintenance, which. This includes more 23 in-depth inspections of mechanical systems, load testing of lifting systems, calibration of 24 measurement equipment and other actions as recommended by the equipment manufacturer 25 and/or as required by DOE Orders. These preventive maintenance activities, along with the 26 Permit-required inspections in Tables E-1 and E-1a, make mechanical failure of waste handling 27 equipment unlikely. The WIPP Safety Analysis ReportDocumented Safety Analysis (DOE/WIPP-28 3372, 1999) and the WIPP Remote-Handled Waste Preliminary Safety Analysis Report (RH 29 PSAR) (DOE, 2000) contains the results of a systematic analysis of waste handling equipment 30 31 and the hazards associated with potential mechanical failures. Equipment subject to failures that cannot practically be mitigated is retained for analysis and is the basis for contingency planning. 32 The inspection procedures maintained in the Operating Recordkept on file at the WIPP facility 33 for operational and preventive maintenance are implemented to assure the equipment is 34 maintained. An example equipment inspection checklist and a typical logbook form are shown 35 as Figures E-1 and E-2. Actual checklists or forms are maintained within the Operating Record. 36

37 <u>E-1a General Inspection Requirements</u>

Tables E-1, and E-1a, and E-2 of this Permit Attachment list the major categories of monitoring

³⁹ equipment, safety and emergency systems, security devices, and operating and structural

equipment that are important to the prevention or detection of, or the response to,

environmental or human health hazards caused by hazardous waste. These systems may

include numerous subsystems. These systems are inspected according to the frequency

43 <u>frequencies</u> listed in Tables E-1 and E-1a, a copy of which is maintained at the WIPP facility.

The frequency of inspections, which is are based on the nature of the equipment or the hazard
 and regulatory requirements. When in use, daily inspections are made of areas subject to spills,

and regulatory requirements. When in use, daily inspections are made of areas subject
 such as TRU mixed waste loading and unloading areas in the WHB Unit. looking for

deterioration in structures, mechanical items, floor coatings, equipment, malfunctions, etc., in

2 accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4)).

As required in 20.4.1.500 NMAC (incorporating 40 CFR §264.33), the WIPP facility inspection procedures for communication and alarm systems, fire-protection equipment, and spill control and decontamination equipment include provisions for testing and maintenance to ensure that

6 the equipment will be operable in an emergency.

7 E-1a(1) Types of Problems

The inspections for the systems, equipment, <u>and</u> structures, <u>etc.</u>, listed in Tables E-1 and E-1a, include the types of problems (e.g., malfunctions; visible cracks in <u>tubing</u>, coatings, or welds; and deterioration) to be looked for during the inspection of each item or system, if applicable, and are in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(3)).

12 <u>E-1a(2)</u> Frequency of Inspections

Tables E-1, and E-1a, and E-2 of this Permit Attachment list the inspection frequencies and 13 monitoring schedule for equipment and systems subject to the 20.4.1 NMAC hazardous waste 14 management requirements. The frequency is based on the rate of possible deterioration of the 15 equipment and the probability of an environmental or human health incident if the deterioration 16 or malfunction, or any operator error, goes undetected between inspections. When in use, daily 17 inspections are made of areas subject to spills, such as TRU mixed waste loading and 18 unloading areas in the Waste Handling Building (WHB) Unit, and involve looking for 19 deterioration in structures, mechanical items, floor coatings, equipment, malfunctions, etc., in 20 accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4)). Areas subject to spills, 21 such as loading and unloading areas, are inspected daily when in use, consistent with the 22 requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4)). 23

When RH TRU mixed waste is present in the RH Complex, inspections are conducted visually
 and/or using closed-circuit video cameras in order to manage worker dose and to minimize
 occupational radiation exposures to as low as reasonably achievable (ALARA). More extensive
 inspections of these areas are performed at least annually during routine maintenance periods
 and when RH TRU mixed waste is not present.

29 <u>E-1a(3)</u> Monitoring Systems

There are two monitoring systems used at the WIPP <u>facility</u> to provide assurance that facility 30 systems are operating correctly, that areas can be used safely, and that there have been no 31 releases of hazardous waste constituents. These systems are shown in Table E-2 and include 32 the geomechanical monitoring system and the central monitoring system (CMS). The 33 geomechanical monitoring system is used to assess the condition of mined excavations to 34 assure noidentify the development of unsafe conditions are allowed to develop. The CMS 35 continuously assesses the status of the fixed radiation monitoring equipment, electrical power, 36 fire alarm systems, ventilation system, and other facility systems including water tank levels. In 37 addition, the CMS collects data from the meteorological monitoring system. Key equipment 38 monitored by these two systems are identified in Table E-1 and include a specified inspection 39 40 frequency.

1 <u>E-1b</u> Specific Process Inspection Requirements

2 The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4)), requires require

3 inspections of specific portions of a facility, rather than the general facility. These include

4 container storage areas and miscellaneous units. Both are addressed below.

5 <u>E-1b(1)</u> Container Inspection

The Permittees use Containers containers are used to manage TRU mixed waste at the WIPP 6 facility. These containers are described in Permit Part 3, Section 3.3.1, and Permit Attachment 7 A1, Section A1-1b. Off-site waste that will be managed and stored as CH TRU mixed waste will 8 arrive in 55-gallon drums arranged as seven (7)-packs, in Ten Drum Overpacks (TDOP), in 85-9 gallon drums arranged as four (4) packs, in 100-gallon drums arranged as three (3) packs, in 10 standard waste boxes (SWB), in standard large box 2s (SLB2s) or shielded containers as (3)-11 packs. The waste containers will beare visually inspected to ensure that the waste containers 12 are in good condition and that there are no signs that a release has occurred. This visual 13 inspection shall-does not include the center drums of 7seven-packs and waste containers 14 positioned such that visual observation is precluded due to the arrangement of waste 15 assemblies on the facility pallets. If CH TRU mixed waste handling operations should stop for 16 any reason with containers located on in the TRUPACT-IICH package Unloading Dock (e.g., at 17 the TRUDOCKs storage area of the WHB Unit) or in roomRoom 108) while still in the Contact-18 Handled Packages, primary waste container inspections could not cannot be accomplished until 19 the containers of waste are removed from the shipping containers<u>CH package</u>. 20

As described in Permit Attachment A1, Section A1-1d(3), off-site waste that will be managed

22 and stored as RH TRU mixed waste will arrives in containers inside Nuclear Regulatory

Commission (NRC)-certified casks designed to provide shielding and facilitate safe handling.
 Canisters, will be loaded singly into an RH-TRU 72-B cask. Drums will be loaded into a CNS 10-

Canisters, will be loaded singly into an RH-TRU 72-B cask. Drums will be loaded into a CNS 10 160B cask. The cask will beis visually inspected upon arrival. Because RH TRU mixed waste is

stored in the Parking Area Unit in sealed casks, there are no additional requirements for

engineered secondary containment systems. Following removal of the canisters and or drums,

the interior of the cask will beis inspected and surveyed for evidence of contamination that may

²⁹ have occurred during transport.

Off-site waste that will be managed and stored as RH TRU mixed waste is managed and stored 30 in the RH Complex of the WHB. The RH Complex includes the following: RH Bay, the Cask 31 Unloading Room, the Hot Cell, the Transfer Cell, and the Facility Cask Loading Room. As RH 32 TRU mixed waste is held in canisters within a canister rack the physical inspection of the drum 33 or canister is not possible. Inspections of RH TRU mixed waste in these areas occurs remotely 34 via closed-circuit cameras a minimum of once weekly when stored waste is present. Because 35 RH TRU mixed waste is in sealed casks, there are no additional requirements for engineered 36 secondary containment systems. However, the The floors in the RH Complex (including the RH 37 Bay, Facility Cask Loading Room and Cask Unloading Room) are coated concrete and during 38 39 normal operations (i.e., when waste is present), the floor of the RH Complex is inspected visually or by using close-circuit cameras on a weekly basis to verify that it is in good condition 40

and free of visible cracks and gaps.

Inspections of RH TRU mixed waste containers stored in the Hot Cell and Transfer Cell are
 conducted using remotely operated cameras. RH<u>Remote-handled</u> TRU mixed waste in the Hot
 Cell is stored in either drums or canisters. The containers in the Hot Cell are inspected to

1 ensure that they are in acceptable condition. RH<u>Remote-handled</u> TRU mixed waste in the

2 Transfer Cell is stored in the RH-TRU 72-B cask or shielded insert; therefore, inspections in this

- area focus on the integrity of the cask or shielded insert. RHRemote-handled TRU mixed waste
- 4 in the Facility Cask Loading Room is stored in the facility cask; therefore, inspections in this
- 5 area focus on the integrity of the facility cask.

Inspections will beare conducted in the Parking Area Unit (PAU) at a frequency not less than 6 once weekly when waste is present and focus on the inventory and integrity of the shipping 7 containers and the spacing between trailers carrying the CH or RH packages. This aisle spacing 8 is maintained at a minimum of four feet. These inspections are applicable to loaded Contact-9 Handled<u>CH</u> and Remote-Handled RH Packagespackages. The perimeter fence located at the 10 lateral limit of the Parking Area Unit, coupled with personnel access restrictions into the WHB 11 Unit, will provide the needed security. The perimeter fence and the southern border of the WHB 12 shall mark the lateral limit of the Parking Area Unit. Radiologically controlled areas can be 13 established temporarily with barricades. More permanent structures can be installed. The 14 western boundary can be established with temporary barricades since this area is within the 15 perimeter fence. Access to radiologically controlled areas will only be permitted to personnel 16 who have completed General Employee Radiological Training (GERT), a program defined by 17 the Permittees, or escorted by personnel who have completed GERT. This program ensures 18 that personnel have adequate knowledge to understand radiological posting they may 19 encounter at the WIPP site. The fence of the Radiologically Controlled Area, south from the 20 WHB airlocks, was moved to provide more maneuvering space for the trucks delivering waste. 21 Since TRU mixed waste to be stored in the Parking Area UnitPAU will beis in sealed Contact-22 HandledCH or Remote HandledRH Packagespackages, there will beare no additional 23 requirements for engineered secondary containment systems. Inspections of the Contact-24 Handled and Remote-Handled Packages stored in the Parking Area Unit shall be conducted at 25 a frequency no less than once weekly and will focus on the inventory and integrity of the 26 shipping containers and the spacing between trailers carrying the Contact-Handled or Remote-27 Handled Packages. This spacing will be maintained at a minimum of four feet. 28 Container inspections will be are included as part of the surface TRU mixed waste handling 29 areas (i.e. Parking Area Unit and WHB Unit) inspections described in Tables E-1 and E-1a. 30 These inspections will-also include the Derived Waste Storage Areas of the WHB Unit. The 31 Derived Waste Storage Areas will consist of containers of 55 or 85-gallon drums or SWBs for 32 CH TRU mixed waste and 55-gallon drums for RH TRU mixed waste. A Satellitesatellite 33 accumulation area (SAA) may be required in an area adjacent to the TRUDOCKs for CH TRU 34 mixed waste. An SAA may also be required in the RH Bay and Hot Cell for RH TRU mixed 35

- waste. These SAAs will be set up on an as needed basis at or near the point of generation and
 the derived waste will be discarded into the active derived waste container. All SAAsSatellite
 accumulation areas will beare inspected in accordance with 20.4.1.300 NMAC (incorporating 40
- 39 CFR §262.17).
- 40 E-1b(2) Miscellaneous Unit Inspection

<u>The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.602)</u>, requires that inspections required inthe inspection requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.15 and §264.33), as well as any additional inspection requirements needed to protect human health and the environment, be met. The requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.15 and §264.33) are discussed in Section E-1 of this Permit Attachment, along with how the WIPP facility complies with those requirements for standard types of inspections. Inspection

- 1 frequencies for geomechanical monitoring equipment are provided in Table E-1. The monitoring
- 2 schedule for<u>of the</u> geomechanical instrumentation <u>system</u> is <u>given addressed</u> in Table E-2E-1.
- 3 As described in Permit Attachment A2, Section A2-b(2), the geomechanical monitoring program
- 4 <u>at the WIPP facility is an integral part of the ground-control program. Hazardous waste disposal</u>
- 5 units, access drifts, the Waste Shaft Station, and the underground transport route are monitored
- 6 to provide confirmation of structural integrity. Geomechanical data on the performance of the
- 7 repository shafts is collected as part of the shaft inspections. The results of geomechanical
- 8 monitoring are reported annually, as identified in Permit Attachment A2, Section A2-b(2).

9 <u>References</u>

- 10 DOE, 1999. "WIPP Safety Analysis Report," DOE/WIPP-95-2065. Rev. 4, U.S. Department of
- 11 Energy. Washington, D.C.<u>DOE/WIPP-3372</u>, Waste Isolation Pilot Plant Documented Safety
- 12 <u>Analysis.</u>
- 13 DOE, 2000. "WIPP Remote-Handled Waste Preliminary Safety Analysis" (RH PSAR), U.S.
- 14 Department of Energy. Washington, D.C.

FIGURES

AR Written		t Made <u>O</u> Repairs Required AR #	
(check ETED examples) fluid level k gauges	or complete appro	priate information)	
rteD examples) fluid level k gauges	2014 - 2010 Marca		
examples) fluid level k gauges	Condition	Comments/Corrective Action	
fluid level k gauges			
k gauges			
k gauges			
k gauges			
lle)			
lle)			
tle)			
alarm			
Deterioration Checks: (examples)			
es)			
Run generator 5 min.			
(examples)			
(examples)			
) psi)			
Hand tools & equipment Trauma Kit			
	Signatur	re Time/Date	
Name	Signatur	re Time/Date	
Name		re Time/Date	
•			

NOTE: All items that are mandatory for every inspection form are shown in **bold**.

Figure E-1 Typical Inspection Checklist

HOUR METER READING	E	QUIPMENT NO	
PRE OPS COMPLETED PER	{Procedure Nu		
CORRECTIVE ACTIONS TAK	EN:		

Figure E-2 Typical Logbook Entry

1

2

TABLES

Table E-1 Inspection Schedule/Procedures

System/Equipment Name	Responsible Organization	Inspection ^a Frequency	Procedure Number and Inspection Criteria ^h
Air Intake Shaft Hoist	Underground Operations	Preoperational- ^c	WP 04-HO1004 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m in accordance with Mine Safety and Health Administration (MSHA) requirements
Ambulance (Surface) and Medical Cart (Underground)	Fire Department	Weekly	WP 12-FP0030 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Required Equipment ⁿ
Adjustable Center of Gravity Lift Fixture	Waste Handling <u>Operations</u>	Preoperational- ^c	WP 05-WH1410 Inspecting for Mechanical Operability ^m and Deterioration ^b
Backup Power Supply Diesel Generators	Facility Operations	Monthly	WP 04-ED1301 Inspecting for Mechanical Operability ^m and Leaks/Spills by starting and operating both generators. Results of this inspection are-logged in accordance with WP 04- AD3008-recorded on EA04AD3008-47-0
Facility Inspections (Water Diversion Berms)	Facility Engineering	Annually	WP 10-WC3008 Inspecting for Damage, Impediments to water flow, and Deterioration ^b
Central Monitoring Systems (CMS)	Facility Operations	Continuous	Automatic Self-Checking
Contact Handled (CH) TRU Underground Transporter	Waste HandlingOperations	Preoperational- ^c	WP 05-WH1603 <u>WP 05-WH1604</u> Inspecting for Leaks/Spills, Mechanical Operability ^m , Deterioration ^b , and -area around transporter clear of obstacles, <u>and on-board</u> <u>automatic fire suppression</u> <u>system</u>
Conveyance Loading Car	Waste HandlingOperations	Preoperational- ^c	WP 05-WH1406 Inspecting for Mechanical Operability ^m , Deterioration ^b , path clear of obstacles, and guards in the proper place

System/Equipment Name	Responsible Organization	Inspection ^a Frequency	Procedure Number and Inspection Criteria ^h
Facility Transfer Vehicle	Waste Handling <u>Operations</u>	Preoperational ^e Pre- evolution ^p	WP 05-WH1204 <u>Pre-evolution Checks and</u> <u>Operating Instructions.</u> Inspecting for Mechanical Operability ^m , Deterioration ^b , path clear of obstacles, and guards in the proper place
Emergency Lighting	Fire Department	Monthly/ annually<u>Annually</u>	WP 12-FP0051 Inspecting for Deterioration ^b , and Operability of indicator lights in accordance with NFPA 101
Exhaust Shaft	Underground Operations	Quarterly	PM041099 Inspecting for Deterioration ^b and Leaks/Spills
Eye Wash and Shower Equipment	Equipment CustodianEnvironmental, Safety, Industrial Health	Weekly	WP 12-IS1832 Inspecting for Deterioration ^b
		Semi-annually	WP 12-IS1832 Inspecting for Deterioration ^b and Fluid Levels–Replace as Required
Fire Detection and Alarm System	Fire Protection Engineering	Semi- annually/ annually<u>Annually</u>	WP 12-FP0027 Inspecting for Deterioration ^b and Operability of underground fuel station fire suppression system in accordance with NFPA 17 (semi-annual inspection);
		Monthly/quarterly/annually	Inspecting for Deterioration ^b and Operability of the alarm panel and transmitter, audible/visual alarm devices, detectors, and pull stations in accordance with NFPA 72 (annual inspection) WP 12 FP0028 Inspecting for Deterioration ^b , and Operability of the alarm panel and transmitter, audible/visual alarm devices,
			detectors, and pull stations in accordance with NFPA 72
		Monthly/Quarterly/Annually	<u>WP 12-FP0028</u> Inspecting for Deterioration ^b , and Operability of the alarm panel and transmitter, audible/visual alarm devices, detectors, and pull stations in accordance with NFPA 72

System/Equipment Name	Responsible Organization	Inspection ^a Frequency	Procedure Number and Inspection Criteria ^h
Fire Extinguishers ^j	Fire Department	Monthly	WP 12-FP0036
			Inspecting for Deterioration ^b , Leaks/Spills, Expiration, seals, fullness, and pressure
Fire Hoses	Fire Department	Annually (minimum)	WP 12-FP0031 Inspecting for Deterioration ^b and Leaks/Spills
Fire Hydrants	Fire Protection	Semi-	WP 12-FP0034
	Engineering	annual/ annually<u>Annually</u>	Inspecting for Deterioration ^b and Leaks/Spills
Fire Pumps	Fire Protection	Weekly	WP 12-FP0026
	Engineering		Inspecting for Deterioration ^b , Leaks/Spills, fire water valve position(s), and panel light status
		Annually (Electric Pump)	WP 12-FP5113
			Inspecting for Deterioration ^b , operability, flow, discharge pressure, suction pressure, and pump speed
		Annually (Diesel Pump)	WP 12-FP5114
			Inspecting for Deterioration ^a , operability, flow, discharge pressure, suction pressure, and pump speed
		Annually (Electric Pump)	WP 12-FP5113
			Inspecting for Deterioration ^b , operability, flow, discharge pressure, suction pressure, and pump speed
		Annually (Diesel Pump)	<u>WP 12-FP5114</u>
			Inspecting for Deterioration ^b , operability, flow, discharge pressure, suction pressure, and pump speed
Fire Sprinkler Systems	Fire Protection Engineering	Monthly/ quarterly/	WP 12-FP0025, WP 12- FP0063, and WP 12-FP0064
		annuallyQuarterly/Annually	Inspecting for Deterioration ^b , Leaks/Spills, water pressures and main drain test

System/Equipment Name	Responsible Organization	Inspection ^a Frequency	Procedure Number and Inspection Criteria ^h
Fire and Emergency Response Vehicles (Fire Trucks, Fire Suppression Cart, and Rescue Cart/Truck)	Fire Department	Weekly	WP 12-FP0033 Inspecting for Mechanical Operability ^m , Deterioration ^b , Leaks/Spills, and Required Equipment ⁿ
Electric Forklifts Used for Waste Handling	Waste Operations	<u>Preoperational^c</u>	WP 05-WH1401 WP 05-WH1402 WP 05-WH1403 Inspecting for Leaks/Spills, Mechanical Operability ^m , Deterioration ^b , and presence of on-board fire extinguisher
<u>Diesel</u> Forklifts Used for Waste Handling (Electric and Diesel forklifts, Push Pull Attachment)	Waste Handling<u>Operations</u>	Preoperational-°	WP 05-WH1201 , WP 05-WH1207 , WP 05- WH1401, WP 05 WH1402, WP 05 WH1403, and WP 05-WH1412 Inspecting for Leaks/Spills, Mechanical Operability ^m , Deterioration ^b , and On <u>on</u>- board <u>automatic</u> fire suppression system
Automatic on-board fire suppression systems	Fire Protection Engineering	Monthly/Semi-annually	WP 12-FP0085 WP 12-FP0060 Inspecting for Mechanical Operability ^m and Deterioration ^b
Hazardous Material Response Equipment	Fire Department	Quarterly- <u>Monthly</u>	WP 12-FP0033 Inspecting for Deterioration ^b , and Required Equipment ⁿ
Head Lamps	Facility Personnel	Daily ⁱ	Head lamps are operated daily and are repaired or replaced upon failure
Miners First Aid Station	Fire Department	Quarterly	WP 12-FP0035 Inspecting for Required Equipment ⁿ
Mobile Phones	Facility Personnel	Daily ⁱ	Mobile Phones are operated daily and are repaired or replaced upon failure
Mine Pager Phones (between surface and underground)	Facility Operations	Monthly/Annually ^o	WP 04-PC3017 WP 04-PC3018 Testing of Mine Pager Phones at essential locations
MSHA Air Quality Monitor	Maintenance/ Underground Operations	Daily ⁱ	WP 12-IH1828 Inspecting for Air Quality Monitoring Equipment Functional Check

System/Equipment Name	Responsible Organization	Inspection ^a Frequency	Procedure Number and Inspection Criteria ^h
Perimeter Fence, Gates, Signs	Security	Daily	WP 17-SS1023 Inspecting for Deterioration ^b and Posted Warnings<u>Required Permit</u> <u>Part 2, Section 2.6.4 warning</u> <u>signs</u>
Mine Rescue Self- Contained Breathing Apparatus (SCBA)	Mine Rescue Team	30 days	WP 12-ER3007 Inspection for Deterioration ^b and Pressure ^g
-Fire Department SCBA	Fire Department	Weekly/ monthly<u>Monthly</u>	WP 12-FP0029 Inspecting for Deterioration ^b and Pressure
Site Notification System; Underground Evacuation Alarm System	Facility Operations	Monthly/Annually	WP 04-PC3017 WP 04-PC3018 Testing of PA and Underground Alarms
Radio Equipment	Facility Personnel	Daily ⁱ	Radios are operated daily and are repaired or replaced upon failure
Salt Handling Shaft Hoist	Underground Operations	Preoperational ^c	WP 04-HO1002 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m in accordance with MSHA requirements
Self-Rescuers and Self- Contained Self- Rescuers	Underground Operations	Quarterly	WP 04-AU1026 Inspecting for Deterioration ^b and Functionality in accordance with MSHA requirements
Surface <u>CH</u> TRU Mixed Waste Handling Area ^k	Waste Handling <u>Operations</u>	Preoperational- ^c or Weekly	WP 05-WH1101 Inspecting for Deterioration ^b , Leaks/Spills, Required Aisle Space ^g , Posted Warnings<u>Required Permit</u> <u>Part 2, Section 2.6.4 warning</u> <u>signs</u>, Communication Systems, Container Condition, and Floor coating integrity
TRU Mixed Waste Decontamination Equipment	Waste Handling <u>Operations</u>	Annually	WP 05-WH1101 Inspecting for Required Equipment ⁿ
Underground Openings—Roof Bolts and Travelways	Underground Operations	Weekly	WP 04-AU1007 Inspecting for Deterioration ^b of Accessible Areas

System/Equipment Name	Responsible Organization	Inspection ^a Frequency	Procedure Number and Inspection Criteria ^h
Underground— Geomechanical Instrumentation System (GIS)	Geotechnical Engineering	Monthly	WP 07-EU1301 Inspecting for Deterioration ^b
Underground TRU Mixed Waste Disposal Area	Waste Handling <u>Operations</u>	Preoperational- ^c	WP 05-WH1810 Inspecting for Deterioration ^b , Leaks/Spills, mine pager phones, equipment, unobstructed access, <u>required Permit Part 2.</u> <u>Section 2.6.4 warning</u> signs, debris, and ventilation
Uninterruptible Power Supply (Central UPS)	Facility Operations	Daily	WP 04-ED1542 Inspecting for Mechanical Operability ^m and Deterioration ^b with no malfunction alarms. Results of this inspection are logged in accordance with WP 04- AD3008-recorded on <u>EA04AD3008-20-0</u>
TDOP Upender	Waste Handling<u>Operations</u>	Preoperational ^e <u>Pre-</u> evolution ^e	WP 05-WH1010 <u>Pre-evolution Checks and</u> <u>Operating Instructions.</u> Inspecting for Mechanical Operability ^m and Deterioration ^b
Waste Handling Cranes	Waste Handling<u>Operations</u>	Preoperational- ^c	WP 05-WH1407 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Leaks/Spills
Waste Hoist	Underground Operations	Preoperational- ^c	WP 04-HO1003 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m , Leaks/Spills, in accordance with MSHA requirements
Water Tanks	Facility Operations	Daily	WP 04-AD3008 Inspecting for Deterioration ^b , valve lineup, and water levels. Results of this inspection are logged in accordance with WP 04- AD3008-recorded on EA04AD3008-12-0 and EA04AD3008-13-0

System/Equipment Name	Responsible Organization	Inspection ^a Frequency	Procedure Number and Inspection Criteria ^h
Push-Pull Attachment <u>s</u>	Waste HandlingOperations	Preoperational- ^c	WP 05-WH1401 <u>WP 05-WH1412</u> Inspecting for Damage _± <u>Mechanical Operability^m</u> , and Deterioration ^b
Trailer Jockey	Waste Handling <u>Operations</u>	Preoperational- ^c	WP 05-WH1405 Inspecting for Leaks/Spills, Mechanical Operability ^m and Deterioration ^b
Closure Bulkheads	Underground Operations	Semi-annually	PM000011 PM000015 Integrity and Deterioration ^b <u>in</u> of Accessible Areas
Bolting Robot	Waste Handling <u>Operations</u>	Preoperational ^c	WP 05-WH1203 Mechanical Operability ^m
Yard Transfer Vehicle	Waste Handling <u>Operations</u>	Preoperational ^e Pre- evolution ^p	WP 05-WH1205 <u>Pre-evolution Checks and</u> <u>Operating Instructions</u> . Mechanical Operability ^m , Deterioration ^b , Path clear of obstacles and Guards in proper place
Payload Transfer Station	Waste HandlingOperations	Preoperational ^e <u>Pre-</u> evolution ^p	WP 05-WH1208 <u>Pre-evolution Checks and</u> <u>Operating Instructions</u> , Mechanical Operability ^m , Deterioration ^b , and Guards in proper place
Monorail Hoist	Waste Handling <u>Operations</u>	Preoperational ^e Pre- evolution ^p	WP 05-WH1202 <u>Pre-evolution Checks and</u> <u>Operating Instructions.</u> Mechanical Operability ^m , Deterioration ^b , and Leaks/Spills
Bolting Station	Waste Handling <u>Operations</u>	Preoperational- ^c	WP 05-WH1203 Mechanical Operability ^m , Deterioration ^b , and Guards in proper place

Table E-1 (Continued)Inspection Schedule/Procedures Notes

- ^a Inspection may be accomplished as part of or in addition to regularly scheduled preventive maintenance inspections for each item or system. Certain structural systems of the WHB,<u>and</u> Waste Hoist and Station A are also subject to inspection following severe natural events including earthquakes, tornados, and severe storms. Structural systems include columns, beams, girders, anchor bolts and concrete walls.
- ^b Deterioration includes: obvious visible cracks, erosion, salt build-up, damage, corrosion, loose or missing parts, malfunctions, and structural deterioration.
- ^c "Preoperational" signifies that inspections are required prior to the first use during a calendar day. For calendar days in which the equipment is not in use, no inspections are required. For an area this includes: area is clean and free of obstructions (for emergency equipment); adequate aisle space; emergency and communications equipment is readily available, properly located and sign-posted, visible, and operational. For equipment, this includes: checking fluid levels, pressures, valve and switch positions, battery charge levels, pressures, general cleanliness, and that all functional components and emergency equipment is present and operational.
- ^e These weekly inspections apply to container storage areas when containers of waste are present for a week or more.
- ^g Inspections are performed per manufacturer's maintenance instructions.
- ^h Inspections-and PM's are not required for equipment that is out of service. However, if compensatory measures have been established to ensure an equivalent level of protection during the period that the equipment is out of service (e.g., required equipment/supplies from an out-of-service emergency vehicle have been temporarily relocated), appropriate inspections will be scheduled, conducted, and documented in the Operating Record, in accordance with Attachment E, Section E-1.
- ⁱ Head Lamps, Mobile Phones, and Radios are not routinely "inspected." They are typically used in day-to-day operations. They are used until they fail, at which time they are replaced and repaired.
- ^j Fire extinguisher inspections are performed in accordance with NFPA 10.
- ^k Surface CH TRU mixed waste handling areas include the Parking Area UnitPAU, the WHB unit, and unloading areas.
- ¹ No log forms are used for daily readings. However, readings that are out of tolerance are reported to the CMR and logged by CMR operator. Inspection includes daily functional checks of portable equipment.
- ^m Mechanical Operability means that the equipment has been checked and is operating in accordance with site safety requirements (e.g., proper fluid levels and tire pressure; functioning lights, alarms, sirens, and power/battery units; and belts, cables, nuts/bolts, and gears in good condition), as appropriate.
- ⁿ Required Equipment means that the equipment identified in Table D-2 is available and usable (i.e., not expired/depleted and works as designed).
- Mine pager phones in non-essential locations are not routinely "inspected". Many are used in day-to-day operations. They are used until they fail, at which time they are repaired. Mine pager phones are used routinely by Underground Operations.
- <u>P</u> "Pre-evolution" signifies that inspections are required prior to equipment use in the waste handling process. A TRUPACT-III shipment evolution is considered to be the process that begins with placing a loaded TRUPACT-III package on the Yard Transfer Vehicle (**YTV**) in the PAU, includes waste storage in the WHB Unit, and ends when the empty TRUPACT-III is removed from the YTV in the PAU. Additionally, a TDOP-Upender evolution is considered to be the process that begins with the empty TDOP placed on the Upender, and ends with storage of the overpacked waste container in the WHB Unit.
- In the PAU, the aisle spacing between trailers carrying the CH or RH packages are maintained at a minimum of four feet. In the CH Bay Storage Area of the WHB Unit, a minimum aisle space of 44 inches between loaded facility pallets is maintained. Also, in the CH Bay, a minimum aisle space of 44 inches is maintained between the walls of the CH Bay and a loaded facility pallet.

Table E-1a
RH TRU Mixed Waste Inspection Schedule/Procedures

		Inspection-ª Frequency	Procedure Number (Latest Revision) ⁱ	Inspection Criteria		
System/ Equipment Name	Responsible Organization ^{Jį}			Deterioration ^b	Leaks/ spills	Other
Cask Transfer Car(s)	Waste Operations	Pre-evolution- ^{c,d,e}	WP_05- WH1701 ₽M041187 (Semi-Annual)	Yes	NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
RH Bay Overhead Bridge Crane	Waste Operations	Preoperational- ^{c,d,e,i}	WP_05- WH1741 PM041232 (Quarterly) PM041117 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
Facility Cask	Waste Operations	Pre-evolution- ^{c,d,e,f}	WP_05- WH1713 PM041201 (Annual) PM041203 (Annual)	Yes	<u>Yes</u> NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical PM.
RH Bay Cask Lifting Yoke	Waste Operations	Preoperational- ^{c,d,e,i}	WP_05- WH1741 PM041169 (Annual)	Yes	NA	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication
	Waste Operations	Pre-evolution- ^{c,d,e,f}	WP_05- WH1704 PM041186 (Quarterly) PM041195 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication Electrical Inspection
Facility Cask Rotating Device	Waste Operations	Pre-evolution- ^{c,d,e,f}	WP_05- WH1713 PM041175 (Annual) PM041176 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication Electrical Inspection
Facility Grapple	Waste Operations	Pre-evolution- ^{c,d,e,f}	WP_05- WH1721 PM041172 (Quarterly) PM041177 (Annual)	Yes	NA	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear. Non Destructive Examination
6.25-Ton Grapple Hoist	Waste Operations	Pre-evolution- ^{c,d,e,f}	WP_05- WH1721 PM411028 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication

			Procedure	Inspection Criteria		
	Inspection-ª Frequency		Deterioration ^b	Leaks/ spills	Other	
Transfer Cell Shuttle Car	Waste Operations	Pre-evolution- ^{c,d,e,f}	WP_05- WH1705 PM041184 (Semi-Annual) PM041222 (Annual)	Yes	Yes	Pre-evolution Pre- operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection.
Cask Unloading Room	Waste Operations	Preoperational ^{e,d,e,f,h,i}	WP05-WH1744	Yes	NA	Floor integrity
Hot Cell	Waste Operations	Preoperational ^{c,d,e,f,g,h,i}	WP05-WH1744	Yes	NA	Floor integrity
Hot Cell Overhead Powered Manipulator	Waste Operations	Preoperational- ^{c,d,e,i}	WP_05- WH1743 PM041215 (Annual) PM041216 (Annual) IC411037 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration
Hot Cell Bridge Crane	Waste Operations	Preoperational- ^{c.d.e,i}	WP_05- WH1742 PM041217 (Annual) PM041209 (Annual) IC411038 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration.
Transfer Cell	Waste Operations	Preoperational ^{e.d.e.f.h.i}	WP05-WH1744	Yes	NA	Floor integrity
Facility Cask Loading Room	Waste Operations	Preoperational- ^{c,d,e,f,h,i}	WP05-WH1744	Yes	NA	Floor integrity
Closed Circuit Television Camera	Waste Operations	Preoperational- ^{c,i}	WP_05- WH1757	NA	NA	Operability
Radiation Monitoring Equipmont	Radiation Control	Preoperational ^{e.d.e}	WP12 HP1245 IC240010 WP12 HP1307 IC534000 WP12 HP1314 (Annual)	¥es	NA	Operability Checks, Functional Checks, Instrument calibrations, Flow Calibration, Efficiency Checks.

	Responsible Organization ^{मु}	Inspection-ª Frequency	Procedure Number (Latest Revision) ⁱ	Inspection Criteria		
System/ Equipment Name				Deterioration ^b	Leaks/ spills	Other
Cask Unloading Room Crane	Waste Operations	Preoperational- ^{c,d,e,i}	WP_05- WH1719 PM041190 (Quarterly) PM041191 (Annual) PM041102 (Annual) IC411035 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration.
Horizontal Emplacement Machineand Retrieval Equipment or functionally equivalent equipment		Pre-evolution_ ^{c,d,e,f}	WP 05- WH1733* WP05 WH1700 PM052010 (Semi Annual)* PM052011 (Annual) PM052013 PM052012 PM052014 (Annual)	Yes	Yes	Assembly and Operating Instructions. Electrical Inspection. Position Transducer Calibration. Till Sensor Calibration. * Procedure WP 05- WH1733 is currently not active. The procedure number has been designated for the Horizontal Emplacement Machine when activities are initiated to support resumption of RH waste emplacement.
41-Ton Forklift	Waste Operations	Preoperational- ^{c.d,e,i}	WP_05- WH1602 PM074061 PM052003 (Hours of Use) PM074027 (Quarterly) PM074029 & PM074051 (Annual)	Yes	Yes	Pre-Operational Checks- and on-board automatic fire suppression system PM performed every 100 hours of operation, every 500 hours of operation or every 5 Years. Quarterly Engine Emission Test. Annual Electrical Inspection. Annual NDE.
RH Bay	Waste Operations	Preoperational ^{c.d.e.h.i}	WP05-WH1744	Yes	NA	Floor integrity
Surface RH TRU Mixed Waste Handling Area	Waste Operations	Preoperational <u>adefab</u> i	WP05 WH1744	Yes	Yes	Inspecting for Deterioration ^b , Leaks/Spills, Required Aisle Space ^m , Required Permit Part 2, Section 2.6.4 warning signs. Posted Warning, Communication s Systems, Container Condition, and Floor coating integrity

Table E-1a (Continued) RH TRU Mixed Waste Inspection Schedule/Procedures Notes

- ^a Inspection may be accomplished as part of or in addition to regularly scheduled preventive maintenance inspections for each item or system. Certain structural systems of the WHB are also subject to inspection following severe natural events including earthquakes, tornados, and severe storms. Structural systems include columns, beams, girders, anchor bolts, and concrete walls.
- ^b Deterioration includes: visible cracks, erosion, salt build-up, damage, corrosion, loose or missing parts, malfunctions, and structural deterioration.
- ^c "Pre-evolution" signifies that inspections are required prior to equipment use in the waste handling process. (An evolution is considered to be <u>the process that begins with</u>from the receipt of a cask into the RH Bay through canister emplacement in the underground.) For an area, preoperational inspection includes: area is clean and free of obstructions (for emergency equipment); adequate aisle space; emergency and communications equipment is readily available, properly located and sign posted, visible, and operational. For equipment, this includes: checking fluid levels, pressures, valve and switch positions, battery charge levels, pressures, general cleanliness, and that functional components and emergency equipment are present and operational. When the equipment is not in use, no inspections are required.
- ^d When equipment needs to be inspected while handling waste (i.e., during waste unloading or transfer operations), general cleanliness and functional components will beare inspected to detect any problem that may harm human health or the environment. The inspection will verify verifies that emergency equipment is present.
- Inspection of RH TRU mixed waste equipment and areas in the RH Complex applies only after RH TRU mixed waste receipt begins.
- ^f The inspection/maintenance activities associated with these pieces of equipment are performed when the RH Complex is empty of RH TRU mixed waste. If contamination is present, a radiation work permit may be needed.
- ^g For the Hot Cell and Transfer Cell, if RH TRU mixed waste is present, camera inspections will be performed in lieu of physical inspection.
- ^h The integrity of the floor coating will be inspected weekly if RH TRU mixed waste is present.
- "Preoperational" signifies that inspections are required prior to the first use in a calendar day. <u>For an area</u>, <u>preoperational inspection includes: area is clean and free of obstructions (for emergency equipment);</u> adequate aisle space; emergency and communications equipment is readily available, properly located and <u>sign-posted</u>, visible, and operational. For equipment, this includes: checking fluid levels, pressures, valve and <u>switch positions</u>, battery charge levels, pressures, general cleanliness, and that functional components and <u>emergency equipment are present and operational</u>. When the equipment is not in use, no inspections are <u>required</u>.
- ^{4]} Responsible organizations refers to the organization that owns the equipment. Preventive Maintenance (PM) procedures are conducted by either mine maintenance or surface operations maintenance personnel and Instrument Calibration (IC) procedures are conducted by instrument and calibration maintenance personnel.
- ^k Inspection will be performed after 250 evolutions (actual and training emplacements), if such usage occurs prior to the semi-annual inspection.
- ¹ Inspections and PM's are not required for equipment that is out of service.
- In the RH Bay of the WHB Unit, a minimum aisle space of 44 inches between loaded casks is maintained. For other locations within the RH Complex, sufficient aisle space is maintained to assure that emergency equipment can be accessed or moved to the necessary locations.

Table E-2 Monitoring Schedule

System/Equipment Name	Responsible Organization	Monitoring Frequency	Purpose
Geomechanical ⁺	Geotechnical Engineering	Monthly	To evaluate the geotechnical performance of the underground facility and to detect ground conditions that could affect operational safety
Central Monitoring System	Facility Operations	System Dependent	Monitor and provide status for the following facility parameters: Electrical Power Status ^{-d} Fire Alarm System ^{-e} Ventilation System Status ^{-f} Meteorological Data System ^{-g} Facility Systems (compressors ^{-g} , pumps ^{-h} , water tank levels ⁻ⁱ , waste hoists ⁻ⁱ)

^b Equipment is listed as Underground Geomechanical Instrumentation System (GIS) in Table E-1.

^d Equipment listed as Backup Power Supply Diesel Generator in Table E-1.

e Equipment listed as Fire Detection and Alarm System in Table E-1.

Equipment listed as Ventilation Exhaust in Table E-1.

^g Not RCRA equipment.

^h Equipment listed as Fire Pumps in Table E-1.

Equipment listed as Water Tank Level in Table E-1.

Equipment listed as Waste Hoist in Table E-1.

ADDENDUM E1 SECURITY

ADDENDUM E1

SECURITY

TABLE OF CONTENTS

Introd	uction	.2
E1-1	Security	.2
	E1-1a Security Procedures and Equipment	
	E1-1a(1) 24-Hour Surveillance System	.2
	E1-1a(2) Barrier and Means to Control Entry	.3
	E1-1a(2)(a) Barrier	.3
	E1-1a(2)(b) Means to Control Entry	.3
	E1-1a(3) Warning Signs	.3

SECURITY

3 Introduction

1

2

- 4 This Permit Attachment describes the security measures taken at the Waste Isolation Pilot Plant
- 5 (WIPP) facility during the Disposal Phase. It describes the security equipment and procedures in
- 6 place at the WIPP facility that continuously monitor and control entry into and exit from the
- ⁷ active portion¹ of the facility, including 24-hour security surveillance, fencing, and signs.

8 E1-1 Security

- 9 The security requirements contained in Title 20 of the New Mexico Administrative Code
- 10 (NMAC), Chapter 4, Part 1 (20.4.1.500 NMAC (incorporating Title 40 of the Code of Federal
- 11 Regulations (CFR) §264.14)), and in 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(4)),
- require that security be provided by 24-hour surveillance or that a barrier be provided to control
- entry into and exit from the active portion of the facility at all times.

14 E1-1a Security Procedures and Equipment

- 15 The WIPP facility has been designed and will be operated by the Permittees to fully meet the
- security requirements contained in 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b) and
- (c)). The WIPP facility has 24-hour security surveillance and the means to control entry into and
- exit from the active portion of the facility. In addition, warning signs are provided. These security

19 measures are discussed below.

20 E1-1a(1) 24-Hour Surveillance System

- 21 The Permittees' 24-hour surveillance system at the WIPP facility is comprised of security
- officers who provide security 24 hours per day, 365 days per year. Security officers work to
- written procedures that require visitors, contractors, and vendors to provide proper authorization
- prior to allowing access into the PPA and require continuous monitoring of the active portion of
- the facility. This system will be maintained to fulfill the requirements of 20.4.1.500 NMAC
- 26 (incorporating 40 CFR §264.14(b)(1)).
- The major duties of the security officers are to control personnel, vehicle, and material 27 access/egress 24 hours per day, 365 days per year. During non-operational hours, the security 28 officers conduct documented security patrols outside of the PPA, at a minimum rate of two per 29 12-hour shift. Whenever scheduled security patrols cannot be made, for situations such as 30 inclement weather or an emergency, the reason for missing the patrol will be documented in the 31 security logbook. In addition to the security officers, WIPP facility employees are called upon to 32 challenge any person in the WIPP facility who is not wearing a badge or who is not under escort 33 when an escort is required. Further physical protection is provided by fences, controlled gates, 34 protective lighting, locked buildings, and signs. 35

¹ The active portion of the facility is a portion of the Property Protection Area (**PPA**) as described in Permit Attachment A, Section A-3. Within this area, the only areas where transuranic mixed waste is handled is the Parking Area Unit, the Waste Handling Building Unit (**WHB**), and the underground.

E1-1a(2) Barrier and Means to Control Entry 1

The existence of a barrier and a means to control entry demonstrates compliance with 2

- 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(2)). Each is discussed in detail in the 3
- following sections. 4

E1-1a(2)(a) Barrier 5

The surface portion of the active portion of the WIPP facility is contained within a fenced area of 6 approximately 34 acres (13.8 hectares) without the New Filter Building (NFB) and approximately 7 44 acres (17.8 hectares) with the NFB. This area is surrounded by a permanent 7 foot (ft) (2.13 8 meter [m]) high chain-link fence that is topped by three strands of barbed wire, for a total height 9 of 8 ft (2.44 m). The fence encloses major surface structures. The regularly inspected chain-link 10 fencing at the WIPP facility surrounds the active portion of the facility, thereby complying with 11 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(2)(i)). Access is normally through the Main 12 Gate on the west side of the active portion of the WIPP facility. Two other gates are available for 13 emergency use. One of these gates is opened to allow salt trucks access to the salt pile. Use of 14 gates is under the supervision of security. 15

E1-1a(2)(b) Means to Control Entry 16

Entry into and exit from the active portion of the WIPP facility, whether by personnel or vehicles, 17 is through controlled gates and doors. Facility access-control procedures are designed to 18 ensure that only properly identified and authorized persons, vehicles, and property are allowed 19 entrance to and exit from the facility. The Permittees use a personnel identification and access 20 control system within the facility. Employees identify themselves with an identification badge 21 when entering or leaving the premises. Security officers require visitors to show proper 22 authorization prior to allowing them to enter the facility. In addition, visitors are required to wear 23 a temporary badge and may require an authorized escort. Because the WIPP facility controls 24 entry to the active portion of the facility at all times, the requirements of 20.4.1.500 NMAC 25 (incorporating 40 CFR §264.14(b)(2)(ii)), are met. 26

E1-1a(3) Warning Signs 27

The permanent chain-link fence surrounding the active portion of the WIPP facility is posted at 28 approximately 50 ft (15.24 m) intervals with "No Trespassing" signs and with "Danger: 29 Authorized Personnel Only" signs in English and Spanish. The signs are legible from a distance 30 of 25 ft (7.62 m) and can be seen from any approach to the facility. These same signs, plus 31 security and traffic signs, are also located on the controlled gates. The fence and gate signs at 32 the WIPP facility comply with 20.4.1.500 NMAC (incorporating 40 CFR §264.14(c)). Warning 33

signs will be posted stating: "Danger: Authorized Personnel Only" in both English and Spanish 34

at other locations such as the WHB Unit, the Parking Area Unit, and the underground 35

Hazardous Waste Disposal Units. 36

ATTACHMENT F

FACILITY PERSONNEL PERMIT TRAINING PROGRAM

ATTACHMENT F

FACILITY PERSONNEL PERMIT TRAINING PROGRAM

TABLE OF CONTENTS

F-0	Introd	uction	2			
F-1	Outline of the Facility Personnel Permit Training Program					
	F-1a	Facility Personnel Permit Training Program Design	3			
	F-1b	Job Title/Job Description	4			
		F-1b(1) Training Content	5			
		F-1b(2) Training Frequency	5			
		F-1b(3) Training Techniques	5			
	F-1c	Technical Training Manager (RCRA Training Director)	6			
	F-1d	Relevance of Training to Job Position	6			
F-2	Implementation of Facility Personnel Permit Training Program					
F-3	Refer	ences	8			

LIST OF TABLES

Table

Title

- Table F-1
 TRU Mixed Waste Management and Emergency Response Job Titles and Descriptions
- Table F-2
 Permit-Required Training Courses

ATTACHMENT F

1 2

FACILITY PERSONNEL PERMIT TRAINING PROGRAM

3 F-0 Introduction

This attachment describes the *Facility Personnel Permit Training Program* for the Waste
Isolation Pilot Plant (WIPP) <u>facility</u> in accordance with the requirements of the Resource
Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act as
described in 20.4.1.500 New Mexico Administrative Code (NMAC) (incorporating <u>Title</u> 40 <u>of the</u>
<u>Code of Federal Regulations (CFR)</u> §264.16), and 20.4.1.900 NMAC (incorporating 40 CFR
§270.14(b)(12)).

10 The primary objective of the *Facility Personnel Permit Training Program* is to prepare facility

- 11 personnel to operate and maintain the WIPP facility in a safe and environmentally sound
- manner in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.16). To achieve this
- objective, the program provides WIPP facility employees with training relevant to their positions.

14 <u>Waste Isolation Pilot PlantWIPP</u> facility employees, including those not directly involved in

transuranic (**TRU**) mixed waste handling activities or emergency response, receives an

- ¹⁶ introduction to the RCRA regulations and emergency preparedness in their General Employee
- 17 Training (GET) class. General Employee Training emphasizes that WIPP facility personnel and
- site visitors are required to comply with directions from emergency personnel and alarm system
- notifications and to follow instructions concerning emergency equipment, shutdown procedures, signage, and emergency evacuation routes and exits. In this way employees at the WIPP facility
- signage, and emergency evacuation routes and exits. In this way employees at the WIPP facility
 are given, at a minimum, a basic understanding of the regulatory requirements and emergency
- procedures. This ensures that facility employees know how to respond effectively to
- ²³ emergencies through familiarization with emergency procedures, emergency equipment, and
- 24 emergency systems. <u>Facility</u> <u>Employees employees</u> in TRU mixed waste management or
- ²⁵ emergency response positions receive additional classroom and on-the-job training designed
- specifically to teach them how to perform their duties safely and in conformance with regulatory
- 27 requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264). TRU-Transuranic mixed
- waste management personnel receive the required training before being allowed to work
 unsupervised, and emergency response personnel receive appropriate training before being
- called upon to respond to actual emergencies.
 - 31 The training requirements of the Facility Personnel Permit Training Program are implemented

via the *WIPP Training Program* and apply to appropriate facility personnel of the U.S.

- Department of Energy (DOE) and contractors, subcontractors, and bargaining-unit members
 who;
- Regularly work at the facility that may come in contact with and/or manage TRU mixed waste, or
- Oversee the operations of the facility that may come in contact with and/or manage TRU mixed waste, or
- Supervise individuals who may come in contact with and/or manage TRU mixed waste,
 or
- Provide emergency response capabilities.

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

- 1 This Facility Personnel Permit Training Program describes the introductory and continuing
- training provided to personnel at the WIPP facility, with emphasis on those facility personnel and
- their supervisors whose jobs are such that their actions or failure to act could result in a spill or
- 4 release, or the immediate threat of a spill or release of TRU mixed waste.
- 5 This *Facility Personnel Permit Training Program* does not apply to facility employees who 6 manage site-generated hazardous waste, low-level waste, universal waste, or other forms of
- nanage site-generated nazardous waste, low-level waste, univer
 hazardous waste that are not categorized as TRU mixed waste.
- 8 F-1 Outline of the Facility Personnel Permit Training Program
- 9 Employee training for the purpose of TRU mixed waste management and emergency response
- at the WIPP facility is the overall responsibility of the Management and Operating Contractor
- 11 (MOC) Project Manager, with responsibility for implementation delegated to Technical Training.
- 12 Technical Training is managed by the Technical Training Manager. The Technical Training
- 13 Manager (or designee) has the responsibility for directing the *Facility Personnel Permit Training*
- 14 Program. The list of job titles in Table F-1 presents identifies the jobs at the WIPP facility that
- ¹⁵ <u>include the personnel with identified responsibilities for TRU mixed waste management and</u>
- 16 emergency response.
- 17 <u>F-1a</u> Facility Personnel Permit Training Program Design
- In developing the *WIPP Training Program*, Technical Training has used a modified version of
 the Systematic Approach to Training (SAT) which has five distinct phases to develop training
 programs. These phases are:
- Analysis
- Design

34

35

- Development
- Implementation
- Evaluation
- Technical Training utilizes guidance provided within the DOE Handbooks, "Training Program
- 27 Handbook: A Systematic Approach to Training (DOE-HDBK-1078-94)," and "Alternative
- 28 Systematic Approaches to Training (DOE-HDBK-1074-95)" to direct these five phases.
- Technical Training ensures that Permit-required training is conducted by qualified instructors as indicated in the *WIPP Training Program*.
- Cognizant line managers provide significant input on training requirements for the-WIPP facility <u>personnel</u> to qualified instructors who develop the following, as required:
- Classroom Instruction
 - Required reading, structured self-study, eLearning, <u>computer-based</u> training
 - On-the-Job Training
- ³⁶ Upon completion of the specific classroom, computer based<u>computer-based</u> training, eLearning
- or structured self-study technical training courses, trainees must successfully complete written or oral examinations to demonstrate competency.

- Technical training documentation and records are maintained by Technical Training located at
 the WIPP facility. Documents and records required by 20.4.1.500 NMAC (incorporating 40 CFR
 §264.16(d)(1), (2), (3), and (4) are maintained in WIPP facility files and include the following:
- Job titles for positions related to TRU mixed waste management and emergency
 response and names of the employee filling those positions
- Written job descriptions for the applicable positions
- Written description of the type and amount of introductory and continuing training given
 for each applicable position
- Records documentation that the training or job experience required has been given to or
 completed by facility personnel include as appropriate:
- 11 Course Attendance

12

13

14

- Completed Qualification Cards
 - Off-Site Training Documentation
- Training or job experience given and completed for each position
- Documentation is maintained which included includes records of training qualifications, and
 course attendance. The documentation is used to identify course refresher and requalification
 dates. Training records on current personnel are kept in the Technical Training files until facility
- closure. Technical training records on former employees are kept by Technical Training for at
- least three years from the date of employment termination from the WIPP facility. Training
- documentation for emergency response training received by personnel called out in the *RCRA*
- 21 *Contingency Plan* (Permit Attachment D) is also maintained by Technical Training.

22 <u>F-1b Job Title/Job Description</u>

Facility personnel who are involved in TRU mixed waste management and emergency response 23 activities receive the same core RCRA training. A list of TRU mixed waste management and 24 emergency response job titles and position descriptions is provided in Table F-1. An up-to-date 25 list of personnel assigned to these positions is maintained in WIPP facility files by the 26 Permittees in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.16(d)(1)). The 27 core TRU mixed waste management and emergency response training courses are indicated in 28 Table F-2. Any changes to the Facility Personnel Permit Training Program specified training 29 course materials (contained in WIPP facility files) that affect the Table F-2 training course 30 content will be evaluated to determine if a permit modification is required, as specified in 31 20.4.1.900 NMAC (incorporating 40 CFR §270.42 The job titles listed in Tables F-1 include: 32

- Emergency Coordinator
- TRU Mixed Waste Worker
- TRU Mixed Waste Worker Supervisor
- Inspector

37

- RCRA Training Director
- Emergency Responder

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

1 F-1b(1) Training Content

2 To ensure that facility personnel are knowledgeable in responding effectively to emergency

3 situations, every employee, regardless of whether they hold a position in TRU mixed waste

4 management or emergency response, receives GET and an annual refresher training on topics

5 relevant to the management of TRU mixed waste and emergency response that include:

- Emergency Preparedness and Response
 - RCRA (including the Permit and the RCRA Contingency Plan)
 - Fire Protection
- Safety Signage

7

8

Training course updates are identified by periodically reviewing the Table F-2 Permit-required training courses to ensure the content remains consistent with applicable Federal and State regulations. This review will be performed in accordance with the *WIPP Training Program* and the review will be decumented in the WIPP facility files.

the review will be documented in the WIPP facility files.

14 To facilitate identification of changes to Table F-2 Permit-required training courses, changes to

training course materials, which will be maintained in the WIPP facility files, will have revision

numbers and a change history summary. This training course information will be available for

17 NMED inspection upon request.

18 <u>F-1b(2)</u> Training Frequency

19 TRU mixed waste management and emergency response courses are offered at a frequency 20 that ensures new hires or transfers can receive relevant-Permit-specified training within six

20 multiple and the solution of the solution o

- require longer time periods to complete certifications). Annual refresher training is required for
- <u>each Permit course.</u> Employees do not work unsupervised in TRU mixed waste management

positions until they have completed the <u>Permit</u>-required initial training. <u>In cases where an</u>

employee's annual refresher training has lapsed, that employee cannot work unsupervised until

the initial training has been repeated. The cognizant manager notifies the Human Resources

27 Department who notifies the training staff when any employee is transferred into or out of a

position associated with TRU mixed waste management or emergency response.

29 <u>F-1b(3) Training Techniques</u>

30 A variety of instructional techniques are used at the WIPP facility depending on the subject

matter and the techniques that best suit the learning objectives. Many courses may include a

combination of classroom, on-the-job training, <u>computer-based training</u>, eLearning, self-paced

study, laboratory work, and/or comprehensive examinations. Most equipment operation courses

include hands-on practical instruction.

³⁵ Written examinations are used as a technique to test and document the knowledge level of

individuals participating in classroom training courses. The length and content of each exam

varies according to its objective. If individuals fail a written examination, they must be

reexamined in identified areas of weakness.

On-the-job training at the WIPP facility follows a prescribed set of standards specific to the job to be performed. Typically, to become qualified to operate a piece of equipment or system, 1 employees must be able to demonstrate the location and purpose of specified controls and

- 2 gauges, describe proper startup and shutdown procedures, describe specific safety features
- and limitations of the equipment, and, in some cases, perform maintenance functions. They
- 4 must also demonstrate the ability to operate the equipment or system. On-the-job training may
- ⁵ also be function specific, such as performing a specific administrative function that is regulated.
- 6 The terms "on-the-job-training," "on-the-job-evaluation," and "job performance measures" are
- 7 considered equivalent with respect to training courses or qualification cards in accordance with
- 8 DOE-HDBK-1074-95.

In addition to on-the-job training, some positions require the trainee to attend an oral board. The
 oral board is given upon completion of on-the-job training and prior to operating any equipment
 unsupervised. In the oral board, the trainee is quizzed on knowledge learned in on-the-job
 training. The purpose of the oral board is to determine if the trainee fully understands and can
 apply the knowledge learned in the training process.

Individuals who provide evidence of equivalency for specific requirements or prerequisites 14 identified in the Table F-2 Permit-required training courses may be granted an exception from 15 further training to those requirements in accordance with the WIPP Training Program. Requests 16 for exceptions/equivalences are made and evaluated in accordance with the WIPP Training 17 Program. Training exceptions/equivalences must be approved by the RCRA Training Director 18 with concurrence of the Environmental Compliance Manager or his/her designee. Each 19 exception/equivalency request is evaluated per specific criteria, such as 1) completion of 20 previous training (transcripts, training completion records), 2) previous experience 21 22 (résuméresume) that demonstrates the application of knowledge and/or skills presented by course objectives, and 3) satisfactory completion of an examination having equivalent course 23 objectives. Each exception/equivalency will be granted in writing and documented in the 24

25 individual's training record.

26 F-1c <u>Technical Training Manager (RCRA Training Director)</u>

The Technical Training Manager (or designee) directs the Facility Personnel Permit Training 27 Program, implemented via the WIPP Training Program, and is responsible for establishing 28 technical training requirements in cooperation with the line managers. Specifically, this includes 29 analysis, design, development, implementation, and evaluation of technical training. The 30 Technical Training Manager (or designee) is trained in hazardous waste management 31 procedures. The Technical Training Manager (or designee) is also required to be 32 knowledgeable of the applicable regulations, orders, guidelines, and the specific training 33 process employed at the WIPP facility. 34

- The name and qualifications of the current Technical Training Manager are documented in WIPP facility files.
- 37 F-1d Relevance of Training to Job Position

38 The *WIPP Training Program* provides employees and their supervisors with training relevant to

their positions. The SAT process mentioned in Section F-1a is a systematic method for

determining the proper training for each TRU mixed waste management position. It compels

41 managers and training staff to look critically at each position and determine the necessary

- training program for each employee to perform their work in a manner that protects human
- health and the environment and complies with the Permit.

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

- 1 Several training topics are considered relevant for all WIPP facility personnel. The basic
- 2 philosophy at the WIPP facility is that, as a RCRA-regulated facility, facility personnel must
- ³ understand the basic regulatory requirements under which the WIPP facility must operate as
- 4 well as emergency actions required of facility personnel. Therefore, all-WIPP facility personnel
- 5 receive an introduction to the RCRA during their GET.

⁶ Beyond these universal topics, training is designed and implemented relevant to the specific job

7 functions being performed. For example, employees who operate key pieces of equipment

8 necessary to manage contact-handled (CH) or remote-handled (RH) TRU mixed waste (e.g.,

9 forklifts, hoists, bridge cranes, cask transfer cars) must be trained to perform their duties in a

way that ensures the WIPP facility <u>is operated in compliance with the Permit.</u> These employees
 receive on-the-job training and demonstrate the ability to operate the equipment, as appropriate,

and must at a minimum be able to respond effectively to emergencies that might arise while

- performing their duties. Emergency response personnel receive training, commensurate with
- their duties, that ensures their familiarity with emergency procedures, emergency equipment,
- and emergency systems including, but not limited to:
- Procedures for using and inspecting facility emergency equipment:
 - Communications and alarm systems; and
- Response to fires or explosions.

17

As there are no automatic waste feed systems at the WIPP facility, training on parameters for waste feed cut-off systems is not required. Similarly, as there is no potential for groundwater contamination incidents at the WIPP facility, training for responding to such incidents is not required.

23 F-2 Implementation of Facility Personnel Permit Training Program

24 The WIPP Training Program has been formulated to implement the requirements of this Facility

25 Personnel Permit Training Program, thereby ensuring TRU mixed waste management and

²⁶ emergency response personnel employed at the facility receive the training necessary to

²⁷ comply with the requirements of 20.4.1.500 NMAC (incorporating 40 CFR <u>§</u>Part-264.16).

- Newly hired employees, whose job positions are listed in Table F-2, receive the indicated
- training within six months of their date of hire or their transfer to a new position pursuant to
 20.4.1.500 NMAC (incorporating 40 CFR §264.16(b). Personnel do not work unsupervised in
- 20.4.1.500 NMAC (incorporating 40 CFR §264.16(b). Personnel do not work unsupervised
 TRU mixed waste management or emergency response positions until they successfully
- TRU mixed waste management or emergency response positions until they successfully complete the <u>Permit-</u>indicated training requirements. (Note that some emergency responder
- certifications may take more than six months to complete.) TRU mixed waste management and
- emergency response personnel attend annual refresher courses that review the initial training
- received and document knowledge transfer. <u>Per the WIPP Training Program, annual Permit</u>
- 36 refresher training is to be completed within 30 calendar days of an employee's training
- anniversary date. If an employee's annual refresher training has lapsed, they do not work
- 38 <u>unsupervised in TRU mixed waste management or emergency response positions until they</u>
- 39 <u>have successfully repeated the Permit-required initial training.</u>
- 40 Records relating to the *Facility Personnel Permit Training Program* for TRU mixed waste
- 41 management and emergency response personnel are maintained by WIPP Technical Training
- as personally identifiable information. These records are located at the WIPP facility and include

- a roster of employees in hazardous waste management positions; a list of courses required for
- 2 each position; course descriptions; documentation when each employee has received and
- 3 completed appropriate training. Training records of current personnel are kept by Technical
- 4 Training until closure of the WIPP facility. Records of former employees are kept by Technical
- 5 Training for at least three years from the date the employee last worked at the facility.

6 F-3 References

- 7 Nuclear Waste Partnership LLC, "WIPP Training Program," WP 14-TR.01, Rev. 19-FRI, 2017
- Nuclear Waste Partnership LLC, "WIPP Fire Department Training Plan," WP 12-FP.04, Rev. 2,
 2016
- U.S. Department of Energy, *"Training Program Handbook: A Systematic Approach to Training* (DOE-HDBK-1078- 94)"
- U.S. Department of Energy, "Alternative Systematic Approaches to Training (DOE-HDBK-1074
 95)"
- 14

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

2

3

1

TABLES

Table F-1 TRU Mixed Waste Management and Emergency Response Job Titles and Descriptions

Job Title	Position Description		
TRU Mixed Waste Worker	Responsible for or involved in the surface processing, transport, and underground emplacement of contact-handled (CH) and remote-handled (RH) transuranic (TRU) mixed waste. May come into contact with TRU mixed waste while carrying out job duties, actions or failure to act could result in a spill or release of TRU mixed waste at the WIPP facility, and job is important for operating the facility safely and in compliance with the hazardous waste regulations. Depending upon the TRU Mixed Waste Worker's specific job position, this may involve one or more of the following:		
	 Operating waste handling equipment and support systems to unload, handle, and emplace TRU mixed waste into the repository 		
	 Performing spot decontamination of shipping casks, waste containers, and waste handling equipment 		
	Performing waste container overpacking operations		
	 Conducting routine inspections of incoming shipping containers for contamination and damage 		
	Conducting routine contamination surveys during waste handling activities		
	Operating the Waste Shaft Hoist		
	Loading and unloading of the Waste Shaft Conveyance above and below ground		
	 Managing and dispositioning of waste resulting from releases of TRU mixed waste or TRU mixed waste constituents 		
	 Cleaning and restoring emergency response equipment after a release of TRU mixed waste or TRU mixed waste constituents and prior to resumption of normal operations 		
TRU Mixed Waste Worker Supervisor	Supervisors of TRU Mixed Waste Workers are directly responsible for day-to-day operations related to TRU mixed waste. Depending upon the TRU Mixed Waste Worker Supervisor's specific job position, job duties may involve one or more of the following:		
	 Overseeing TRU mixed waste management activities performed by TRU Mixed Waste Workers 		
	 Coordinating and directing the daily operation and maintenance of the Waste Shaft Hoist and Waste Shaft 		

I

10

Job Title	Position Description			
Emergency Responder	Emergency responders provide expertise and support to the Incident Command. Depending upon the Emergency Responder's specific job position, job duties may involve one or more of the following:			
	 Responding to fires, explosions, or emergencies involving releases of TRU mixed waste or TRU mixed waste constituents 			
	Performing technical rescue operations			
	Performing emergency medical response			
	Operating emergency vehicles and equipment			
	Establishing conditions at the incident scene			
	Managing incident operations, personnel, and resources			
	• Ensuring that fires, explosions, and releases of TRU mixed waste do not occur, recur, or spread to other hazardous waste at the facility by stopping processes and operations, collecting and containing released TRU mixed waste, and removing or isolating containers, as applicable			
	Performing decontamination of contaminated personnel and providing oversight to emergency medical response personnel, if injured person is contaminated			
	 Conducting contamination surveys, establishing hot lines/cold zones, and performing decontamination following a release of TRU mixed waste or TRU mixed waste constituents 			
	 Overpacking or plugging/patching of waste containers associated with release of TRU mixed waste or TRU mixed waste constituents 			
	 Performing containerization of released TRU mixed waste or TRU mixed waste constituents 			
	Terminating field emergency response			

Job Title	Position Description				
Emergency Coordinator	In the event of a fire, explosion, release of TRU mixed waste or TRU mixed waste constituents that could threaten human health or the environment, the Emergency Coordinator is responsible for carrying out the implementation of the <i>RCRA Contingency Plan</i> . Emergency Coordinators ensure emergency responders have current and specific information to properly address the incident and minimize hazards to human health and the environment. Emergency Coordinators implement measures and procedures to ensure the safety of personnel, such as ensuring that alarms have been activated, personnel have been accounted for, and evacuation of personnel has occurred, if necessary. Upon implementation of the <i>RCRA Contingency Plan</i> , depending upon the Emergency Coordinator's specific job position, the job duties may involve one or more of the following:				
	Providing notification to emergency response personnel				
	 Ensuring that alarms have been activated, personnel have been accounted for, any injuries have been attended to, and evacuation of personnel has occurred, if necessary 				
	 Restricting personnel not needed for response activities from the scene of the incident and curtailing nonessential activities in the area 				
	 Identifying released material and assessing the extent of the emergency 				
	 Assessing any hazards to human health or the environment associated with a fire, explosion, or release of TRU mixed waste or TRU mixed waste constituents 				
	 Notifying appropriate State and local agencies with designated response roles if their help is needed 				
	 Ensuring that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility by taking measures such as stopping processes and operations, collecting and containing released waste, and removing or isolating containers 				
	Documenting the implementation of the RCRA Contingency Plan				
	 Ensuring immediate notification to the New Mexico Environment Department is provided for incidents requiring implementation of the RCRA Contingency Plan 				
	 Making post-assessment notifications if it has been determined that the incident could threaten human health or the environment outside the facility 				
	 Providing for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility 				
	 Ensuring that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed 				
	• Ensuring that emergency equipment listed in the <i>RCRA Contingency Plan</i> is cleaned and fit for its intended use before operations are resumed				

Job Title	Position Description			
Inspector	Responsible for routine inspection and maintenance (including repairing and replacement, as appropriate) of equipment instrumental in preventing, detecting, or responding to environmental or human health hazards, such as monitoring equipment, safety and emergency equipment, and operating or structural equipment. Inspections are performed at the facility to detect malfunctions, deterioration, operator errors, and discharges that may cause or lead to releases of TRU mixed waste or TRU mixed waste constituents to the environment or that could be a threat to human health. Depending on the Inspector's specific job position, job duties may involve one or more of the following:			
	 Performing functional and operational checks of waste handling equipment and support systems as well as conducting waste container storage inspections 			
	Conducting routine inspections of emergency response equipment and vehicles, on site			
	• Performing routine inspections of the hoisting equipment for the Air Intake Shaft, Salt Handling Shaft, and Waste Shaft			
	Conducting routine inspections and testing of facility fire suppression and detection systems			
	 Inspecting and testing of communication systems, site notification system, the public address system, and alarm systems for proper function 			
	Performing routine inspections of the backup power supply diesel generators			
	Performing routine inspections of the eye wash and shower equipment			
	Performing routine inspections of the underground geomechanical instrumentation system			
	Performing routine inspections of the central uninterruptible power supply			
	Performing routine inspections of the fire water storage tank			
	Performing routine inspections of the ventilation exhaust fans			
RCRA Training Director	Responsible for directing the hazardous waste management training at the WIPP facility. To meet the 20.4.1.500 NMAC (incorporating 40 CFR §264.16(a)(3)) requirements, the RCRA Training Director must be a person trained in hazardous waste management procedures.			

Table F-2 Permit-Required Training Courses

Course	TRU Mixed Waste Worker	TRU Mixed Waste Worker Supervisor	Inspector	Emergency Responder	Emergency Coordinator	RCRA Training Director
General Employee Training – WIPP facility employees must be escorted at the WIPP facility until this course has been completed. Course content contains information on RCRA, the Permit, the WIPP <i>RCRA Contingency</i> <i>Plan</i> , emergency preparedness, emergency response and evacuation procedures, fire protection, and safety signage. There is an annual refresher required for this course.	Х	X	Х	Х	Х	Х
RCRA Regulations/Hazardous Waste Facility Permit Overview – This course includes an overview of 40 CFR Parts 260-282; New Mexico Hazardous Waste Act (Title 20 of the NMAC, Part 4.1); protocol for facility and waste handling equipment inspections; overview of communication systems; overview of security systems; overview of RCRA Contingency Plan; overview of WIPP emergency equipment use, inspection, and repair; overview of training requirements; overview of Permit recordkeeping requirements; overview of NMED facility inspections; and consequences of Permit noncompliance. This course also provides an overview of the screening process (for procedures, facility configuration changes, training program changes, etc.) to ensure compliance with the Permit, along with an overview of the Permit modification process. There is an annual refresher required for this course.	X	X	X	X	X	X

Waste Isolation Pilot Plant Hazardous Waste Facility Permit Renewal Application March 2020

Course	TRU Mixed Waste Worker	TRU Mixed Waste Worker Supervisor	Inspector	Emergency Responder	Emergency Coordinator	RCRA Training Director
Hazardous Waste Worker – This course addresses regulatory requirements for personnel who manage hazardous waste, including an in-depth review of the Hazard Communication Standard, principles of toxicology, hazard identification, and an overview of personal protective equipment for work activities associated with TRU mixed waste management. It also prepares emergency response personnel for hazardous waste handling, containment, and decontamination. There is an annual refresher required for this course.	X	X		X		X
Hazardous Waste Responder – Employees must complete Hazardous Waste Worker training before taking this course. Upon successful completion of the course and its prerequisites, a trainee will be able to respond to emergencies involving TRU mixed waste. Course curriculum includes an overview of the regulatory requirements, incident evaluation, overview of response operations, maintaining safety during an emergency response, and an overview of the Incident Command System at the WIPP facility. There is an annual refresher required for this course.				Х		
Hazardous Waste Worker Supervisor – This course addresses manager and/or supervisor responsibilities for TRU mixed waste management. It addresses individual and corporate liability under applicable hazardous waste regulations. Course discusses impacts that decisions made during emergency situations may have, some with serious legal and safety consequences directly impacting the entities involved. There is an annual refresher required for this course.		X				

Course	TRU Mixed Waste Worker	TRU Mixed Waste Worker Supervisor	Inspector	Emergency Responder	Emergency Coordinator	RCRA Training Director
Permit Inspections/Recordkeeping – These technical work documents are under the purview of the responsible organization identified in Table E-1 of Permit Attachment E, <i>Inspection</i> <i>Schedule, Process and Forms</i> . This course addresses protocols for conducting Permit-specified inspections to detect malfunctions, deterioration, operator errors, and discharges; completion of inspection records; Permit-specified inspection frequencies; and corrective actions, including notifications and establishment of compensatory measures. This course also addresses review of the completed inspection record for completeness and accuracy; and the Permit-specified recordkeeping requirements. There is an annual refresher required for this course.			X			
RCRA Contingency Plan – This course provides an in-depth review of the WIPP <i>RCRA Contingency Plan</i> addressing when the Plan is to be implemented, appropriate emergency response actions, required notifications, evacuation plan details, and post-emergency RCRA-required activities. This course also addresses where copies of the Plan are required to be located and when the Plan must be amended. There is an annual refresher required for this course.					X	

I

1

ATTACHMENT G

CLOSURE PLAN

1			ATTACHMENT G	
2			CLOSURE PLAN	
3			TABLE OF CONTENTS	
4	Introduct	tion		3
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	6 6 6 6		e Plan. 4 Closure Performance Standard. 5 G-1a(1) Container Storage Units 6 G-1a(2) Miscellaneous Unit. 6 G-1a(3) Post-Closure Care 7 Requirements 7 Maximum Waste Inventory 7 Schedule for Closure 8 G-1d(1) Schedule for Panel Closure 8 G-1d(2) Schedule for Final Facility Closure 8 G-1d(3) Extension for Closure Time 7 G-1d(4) Amendment of the Closure Plan 10 Closure Activities 1 G-1e(1) Panel Closure 1 G-1e(2) Decontamination and Decommissioning 13 G-1e(3) Performance of the Closed Facility 2	55677788890113
21 22 23	G	lotice 3-2a 3-2b	s Required for Disposal Facilities	1
24 25	Referenc	ces		3

1		LIST OF TABLES
2	Table	Title
3 4 5	Table G-2 An	ticipated Earliest Closure Dates for the Underground HWDUs ticipated Overall Schedule for Closure Activities verning Regulations for Borehole Abandonment
6		
7		LIST OF FIGURES
8	Figure	Title
9 10 11 12 13 14 15 16	Figure G-1 Figure G-2 Figure G-3 Figure G-4 Figure G-4a Figure G-5 Figure G-6	WIPP Panel Closure Schedule WIPP Facility Final Closure 84-Month Schedule Bulkhead and ROM Salt Locations

1		ATTACHMENT G
2		CLOSURE PLAN
3	Introduction	

This Permit Attachment contains the Closure Plan that describes the activities necessary to 4 close the Waste Isolation Pilot Plant (**WIPP**) individual units and facility. Since the current plans 5 for operations extend over several decades, the Permittees will periodically reapply for an 6 operating permit in accordance with 20.4.1.900 New Mexico Administrative Code (NMAC) 7 (incorporating Title 40 of the Code of Federal Regulations (CFR) §270.10(h)). Consequently, 8 this Closure Plan describes several types of closures. The first type is panel closure, which 9 involves constructing closures forin each of the underground hazardous waste disposal units 10 (HWDUs) after they are filled. The second type is partial closure, which can be less than the 11 entire facility and, therefore, less than an entire unit as described herein for the Waste Handling 12 Building (WHB) Container Storage Unit (WHB Unit), the Parking Area Container Storage Unit 13 (PAU), or Permit-related surface equipment, structures and contaminated soils. The third type of 14 closure is final facility closure at the end of the Disposal Phase, which will entail "clean" closure 15 of all-remaining surface storage units and construction of the four-shaft seal systems. Finally, in 16 the event a new permit is not issued prior to expiration of an existing permit, a modification to 17 this Closure Plan will be sought to perform contingency closure. Contingency closure defers the 18 final closure of waste management facilities such as the Waste Handling Building Container 19 Storage Unit (WHB Unit), the conveyances, the shafts, and the haulage ways because these 20 will be needed to continue operations with non-mixed Transuranic (TRU) waste. 21

The hazardous waste management units (**HWMUs**) addressed in this Closure Plan include the aboveground HWMU in the WHB <u>Unit</u>, the <u>PAU</u>parking area HWMU, and Panels 1 through 8, each consisting of seven rooms. In addition, this Closure Plan includes closures for Panels 9 and 10.

This plan was submitted to the New Mexico Environment Department (NMED) in accordance 26 with 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(13)). Closure at the panel level will 27 include the construction of barriers that will contribute to limiting the emission of hazardous 28 waste constituents from the panel into the mine ventilation air stream below levels that meet 29 environmental performance standards. The Post-Closure Plan (Permit Attachment H) includes 30 the implementation of institutional controls to limit access and groundwater monitoring to assess 31 32 disposal system performance. Until final closure is complete and has been certified in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.115), a copy of the approved 33 Closure Plan and all-approved revisions will be on file at the WIPP facility and will be available 34 35 to the Secretary of the NMED in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.112(a)(2))or the U.S. Environmental Protection Agency (EPA) Region VI Administrator 36 upon request. 37

- 38 <u>This Closure Plan uses the terms Disposal Phase, facility closure period, and post-closure care</u>
- 39 period. The Disposal Phase began with the first waste emplacement in March 1999 and extends

<u>until the facility reaches its maximum capacity as defined in Section G-1c. The facility closure</u>
 period is the 10-year period that begins once the final waste has been emplaced in the

- 42 underground. The post-closure care period extends for 30-years after completion of facility
- 43 <u>closure period.</u>

1 G-1 Closure Plan

This Closure Plan is prepared in accordance with the requirements of 20.4.1.500 NMAC 2 (incorporating 40 CFR Part §264, Subparts G, I, and X), Closure and Post-Closure, Use and 3 Management of Containers, and Miscellaneous Units. The WIPP underground HWDUs, shown 4 on Figure M-43G-1, will be closed under this Closure Plan to meet the performance standards in 5 20.4.1.500 NMAC (incorporating 40 CFR §264.601). The WIPP surface facilities, including the 6 WHBWaste Handling Building Container Storage Unit and the PAUParking Area Container 7 Storage Unit, will be closed in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 8 §264.178). The Permittees may perform partial closure of the WHB_Unit, PAU HWMUs, or 9 Permit-related surface equipment, structures and contaminated soils prior to final facility closure 10 and certification. For final facility closure, this plan also includes closure and sealing of the 11 facility shafts in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.601). 12

Following completion of waste emplacement in each underground HWDU, the HWDU will be
 closed. The Permittees will notify the NMED of the closure of each underground HWDU as
 specified in the schedule in Figure <u>M-60</u>G-2. For the purpose of this Closure Plan, panel closure
 is defined as the process of rendering underground HWDUs in the repository inactive and
 closed according to the facility Closure Plan. The Post-Closure Plan (Permit Attachment H)
 addresses requirements for future monitoring that are deemed necessary for the post-closure
 period, prior to final facility closure.

For the purposes of this Closure Plan, final facility closure is defined as closure that will occur 20 when all-permitted HWDUs are filled or have achieved their maximum capacities as outlined in 21 Permit Part 4, Table 4.1.1, or when the WIPP facility achieves its capacity of 6.2 million cubic 22 feet (ft³) (175,564 cubic meters (m³)) of Land Withdrawal Act (LWA)TRU waste volume. At final 23 facility closure, the surface container storage areas will be closed, and equipment that can be 24 decontaminated and used at other facilities will be cleaned and sent off site. Equipment that 25 cannot be decontaminated plus any derived waste resulting from decontamination will be placed 26 in the last open underground HWDU. In addition, shafts and boreholes which lie within the 27 WIPP Site Boundary and penetrate the Salado Formation (Salado) will be plugged and sealed. 28 and surface and subsurface facilities and equipment will be decontaminated, if necessary, and 29 removed and dispositioned appropriately or, alternatively, disposed in the last open 30 underground HWDU as derived waste. Final facility closure will be completed to demonstrate 31 compliance with the Closure Performance Standards contained in 20.4.1.500 NMAC 32

33 (incorporating 40 CFR §264.111, 178, and 601).

In the event the Permittees fail to obtain an extension of the hazardous waste permit in 34 35 accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.51) or fail to obtain a new permit in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.10(h)), the Permittees 36 will seek a modification to this Closure Plan in accordance with 20.4.1.900 NMAC (incorporating 37 40 CFR §270.42) to accommodate a contingency closure. Under contingency closure, storage 38 units will undergo clean closure in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 39 §264.178): waste handling equipment, shafts, and haulage ways will be inspected for hazardous 40 waste residues (using, among other techniques, radiological surveys to indicate potential 41 hazardous waste releases as described in Permit Attachment G3) and decontaminated as 42 necessary; and underground HWDUs that contain radioactive mixed waste will be closed in 43 accordance with the panel closure design described in this Closure Plan. Final facility closure, 44 however, will be redefined and a time extension for final closure will be requested. A copy of this 45

- Closure Plan will be maintained by the Permittees at the WIPP facility and at the U.S. 1
- Department of Energy (DOE) Carlsbad Field Office. The primary contact person at the WIPP 2 facility is: 3
- Manager, Carlsbad Field Office 4
- U.S. Department of Energy 5
- Waste Isolation Pilot Plant 6
- P. O. Box 3090 7
- Carlsbad, New Mexico 88221-3090 8
- (575) 234-7300 9
- G-1a Closure Performance Standard 10
- The closure performance standard specified in 20.4.1.500 NMAC (incorporating 40 CFR 11
- §264.111), states that the closure shall be performed in a manner that minimizes the need for 12
- further maintenance; that minimizes, controls, or eliminates the escape of hazardous waste; and 13
- that conforms to the closure requirements of §264.178 and §264.601. These standards are 14
- discussed in the following paragraphs. 15
- **Container Storage Units** G-1a(1) 16
- Final or partial closure of the permitted container storage units (the WHBWaste Handling 17 Building Unit and PAUParking Area Unit) will be accomplished by removing all-waste and waste 18 residues. Indication of waste contamination will be based, among other techniques, on the use 19 of radiological surveys as described in Permit Attachment G3. Radiological surveys use very 20 sensitive radiation detection equipment to indicate if there has been a potential release of TRU 21 mixed waste, including hazardous waste components, from a container. This allows the 22 Permittees to indicate potential releases that are not detectable from visible evidence such as 23 stains or discoloration. Visual inspection and operating records will also be used to identify 24 areas where decontamination is necessary. Contaminated surfaces will be decontaminated until 25 radioactivity is below DOE-established radiological protection limits¹. Once surfaces are 26 determined to be free of radioactive waste constituents, they will be sampled for hazardous 27 waste contamination. Hazardous waste decontamination, if needed, will be conducted in 28 accordance with the requirements of the Permit and the standards in 20.4.1.500 NMAC 29 (incorporating 40 CFR Part 264). These surface decontamination activities will ensure the 30 removal of waste residues to levels protective of human health and the environment. The facility 31 is expected to require no decontamination at closure because any waste spilled or released 32 during operations will be contained and removed immediately. Solid waste management units 33 listed in Attachment K, Table K-4 will be subject to closure. 34
- Once the container storage units are decontaminated and certified by the Permittees to be 35 clean, no further maintenance is required. The facilities and equipment in these units will be 36
- available reused for other purposes as needed. If portions of the facilities or equipment in these 37
- units, which require decontamination, cannot be decontaminated, these portions will be 38 removed, and the resultant wastes will be managed consistent with radiological control
- 39
- procedures pursuant to 10 CFR Part 835. 40

¹ Title 10 CFR Part 835.

1 <u>G-1a(2) Miscellaneous Unit</u>

- Post-closure migration of hazardous waste or hazardous waste constituents to ground or 2 surface waters or to the atmosphere, above levels that will harm human health or the 3 environment, will not occur due to facility engineering and the geological isolation of the unit. 4 The engineering aspects of closure are centered on the use of panel closures on each of the 5 underground HWDUs and final facility seals placed in the shafts. The design of the panel 6 closure system is based on the criteria that the closure system for closed underground HWDUs 7 will prevent migration of hazardous waste constituents in the air pathway in concentrations 8 above health-based levels beyond the WIPP land withdrawal boundary during the Disposal 9 Phase35 year operational and facility closure period. 10 Consistent with the definitions in 20.4.1.101 NMAC (incorporating 40 CFR §260.10), the 11 process of panel closure is considered partial closure because it is a process of rendering a part 12 of the repository inactive and closed according to the approved underground HWDU partial 13 closure plan. Panel closure will be complete when the panel closure system is emplaced and 14 operational, when that underground HWDU and related equipment and structures have been 15 decontaminated (if necessary), and when the NMED has been notified of the closure. 16
- Shaft seals are designed to provide effective barriers to the inward migration of ground-water
 and the outward migration of gas and contaminated brine over two discrete time periods.
 Several components become effective immediately and are expected to function for 100 years.
 Other components become effective more slowly, but provide permanent isolation of the waste.
 The final shaft seal design is specified in Permit Attachment G2.
- The facility will be finally closed to minimize the need for continued maintenance. Protection of human health and the environment includes, but is not limited to:
- Prevention of any releases that may have adverse effects on human health or the
 environment due to the migration of waste constituents in the groundwater or in the
 subsurface environment [20.4.1.500 NMAC, incorporating 40 CFR §264.601(a)].
- Prevention of any releases that may have adverse effects on human health or
 environment due to migration of waste constituents in surface water, in wetlands, or on
 the soil surface [20.4.1.500 NMAC, incorporating 40 CFR §264.601(b)].
- Prevention of any release that may have adverse effects on human health or the
 environment due to migration of waste constituents in the air [20.4.1.500 NMAC,
 incorporating 40 CFR §264.601(c)].
- As part of final facility closure, surface recontouring and reclamation will establish a stable vegetative cover, and further surface maintenance will not be necessary to protect human health and the environment. Prior to cessation of active controls, monuments will be emplaced to serve as long-term site markers to discourage activities that would penetrate the facility or impair the ability of the salt formation to isolate the waste from the surface environment for at least 10,000 years. The Federal government will maintain administrative responsibility for the repository site in perpetuity and will limit future use of the area.
- If, during panel or final facility closure activities, unexpected events require modification of this
 Closure Plan to demonstrate compliance with closure performance standards, a Closure Plan

amendment will be submitted in accordance with 20.4.1.900 NMAC (incorporating 40 CFR
 §270.42).

3 <u>G-1a(3)</u> Post-Closure Care

The post-closure care period will begin after completion of the first panel closure and will
continue for 30 years after final facility closure. The post-closure care period may be shortened
or lengthened at the discretion of the <u>NMED</u>regulatory agency based on evidence that human
health and the environment are being protected or that they are at risk. During the post-closure
<u>care</u> period, the WIPP <u>facility</u> shall be maintained in a manner that complies with the
environmental performance standards in 20.4.1.500 NMAC (incorporating 40 CFR §264.601).
Post-closure activities are described in Permit Attachment H.

11 <u>G-1b Requirements</u>

The Permit specifies a sequential process for the closure of individual HWMUs at the WIPP 12 facility. Each underground HWDU will undergo panel closure when waste emplacement in that 13 HWDUpanel is complete. Following waste emplacement in each underground HWDU, 14 construction-side ventilation will be terminated, and waste-disposal-side ventilation will be 15 established in the next underground HWDU to be used, and the underground HWDU containing 16 the waste will be closed. The Permittees will notify the NMED of the closure of each of the 17 underground HWDUs as they are sequentially filled on a HWDU-by-HWDU basis. The HWMUs 18 in the WHB and in the parking area will be closed as part of final facility closure of the WIPP 19 facility. 20

The Permittees will notify the Secretary of the NMED in writing at least 60 days prior to the date on which closure activities are scheduled to begin.

23 G-1c Maximum Waste Inventory

The maximum waste inventory (maximum capacity) for the permitted HWDUs is established in 24 Permit Part 4, Table 4.1.1. During the Disposal Phase, and inIn accordance with the LWA, the 25 WIPP facility will receive no more than 6.2 million ft³ (175,564 m³) of LWA TRU waste volume, 26 which may include up to 250,000 ft³ (7,079 m³) of remote-handled (RH) TRU mixed-waste. 27 Excavations are mined as permitted when needed during operations to maintain a reserve of 28 disposal areas. The amount of waste placed in each room is limited by structural and physical 29 considerations of equipment and design. Transuranic mixed waste volumes include waste 30 received from off-site generator locations as well as derived waste from disposal and 31 decontamination operations. For closure planning purposes, a maximum achievable volume of 32 685,100 ft³ (19,400 m³) of TRU mixed waste per panel-HWDU is usedlisted in Permit Part 4, 33 Table 4.1.1. This equates to 662,150 ft³ (18,750 m³) of contact-handled (CH) TRU mixed waste 34 and 22,950 ft³ (650 m³) of RH TRU mixed waste per panel. 35

- 36 The maximum extent of operations during the term of this permit is expected to beincludes
- Panels 1 through <u>8, Panel 10, and proposed additional panels as discussed in Renewal</u>
- 38 Application Addendum G1 (DOE, 2020);10 as shown on Figure G-1, the WHB Container
- 39 Storage-Unit: and the PAUParking Area Container Storage Unit. Note that panels Panel 9 will
- 40 <u>not be used for TRU mixed waste disposal and Panel 10 isare</u> not authorized for waste
- 41 emplacement under this permit. <u>Construction of HWDUs beyond Panel 10 is not authorized</u>
- 42 <u>under this Permit, however if</u>f other waste management units are permitted during the Disposal

1 Phase, this Closure Plan will be revised to include the additional waste management units. The

- 2 design basis for a panel assumes that it takes about 30 months to fill the HWDU and initiate
- 3 panel closure (DOE, 1997). However, it is anticipated that Panel 7, Panel 8, and Panel 10 (if
- 4 authorized in the future for TRU mixed waste disposal) will take longer than 30 months to fill due
- 5 to the reduction in available ventilation capability, ground conditions in Panel 10 and associated
- 6 remediation efforts, and radiological contamination in Panel 10. These assumptions have been
- 7 <u>used in preparing the closure schedule in Table G-1.</u> At any given time during disposal operations, it is possible that multiple rooms may be receiving TPU mixed wasts for disposal
- operations, it is possible that multiple rooms may be receiving TRU mixed waste for disposal at
 the same time. Underground HWDUs in which disposal has been completed (i.e., in which CH
- and RH TRU mixed waste emplacement activities have ceased) will undergo panel closure.

11 G-1d Schedule for Closure

- 12 For the purpose of establishing a schedule for closure, the final waste disposal will mark the end
- 13 of the Disposal Phase and will occur when permitted HWDUs are filled or have achieved their
- 14 maximum capacities as outlined in Permit Part 4, Table 4.1.1, or when the WIPP facility
- 15 achieves its capacity of 6.2 million cubic feet (ft³) (175,564 cubic meters (m³)) of LWA TRU
- 16 <u>waste volume. The Permittees also assume closure will take 10 years</u>an operating and closure

17 period of no more than 35 years (25 years for disposal operations and 10 years for closure) is

assumed. This operating period <u>The Disposal Phase</u> may be extended or shortened, within the

authorized capacities, depending on a number of factors, including the rate of waste approved

- for shipment to the WIPP facility and the schedules of TRU mixed waste generator sites, and future decommissioning activities.
- 22 <u>G-1d(1)</u> Schedule for Panel Closure
- ²³ The anticipated schedule for the closure of the underground HWDUs is shown in Figure <u>M-60</u>G-
- 24 2. Underground HWDUs should be ready for closure according to the schedule in Table G-1.
- 25 <u>Table G-1 shows actual dates for completed activities and future dates based on the facility</u>
- 26 <u>design parameters discussed in Section G-1c. These future Future</u> dates are estimates for
- planning and permitting purposes. Actual dates may vary depending on the availability of waste
- from the generator sites.
- ²⁹ In the schedule in Figure <u>M-60</u>G-2, notification of intent to close occurs 30 days before placing
- the final waste in a<u>n HWDU</u>-panel. Once a<u>n HWDU</u>-panel is full, the Permittees will initially block
- ventilation through the <u>HWDU</u>panel as described in Permit Attachment A2, Section A2-2a(3)
- "Subsurface Structures," and then will assess the closure area for ground conditions and
- contamination so that a definitive schedule and closure location can be determined. If as the
- result of this assessment the Permittees determine that a panel closure cannot be emplaced in
 accordance with the schedule in this Closure Plan, a modification will be submitted requesting
- an extension to the time for closure.

37 G-1d(2) Schedule for Final Facility Closure

- 38 The Disposal Phase for the WIPP facility is expected to require a period of 25 years beginning
- 39 with the first receipt of TRU waste at the WIPP facility and followed by a period ranging from 7
- 40 to 10 years for decontamination, decommissioning, and final closure. The Disposal Phase may
- therefore extend until 2024, and the latest expected year of final closure of the WIPP facility
- 42 (i.e., date of final closure certification) would be 2034. If, as is currently projected, the WIPP
- facility is dismantled at closure, all-surface and subsurface facilities (except the hot cell portion

of the WHB, which will remain as an artifact of the Permanent Marker System [PMS]) will be

2 disassembled and either salvaged or disposed in accordance with applicable standards.

3 <u>Subsurface facilities and equipment will be disassembled and disposed or salvaged to the</u>

4 <u>extent practicable based on underground mining practice.</u> In addition, asphalt and crushed

5 caliche that was used for paving will be removed, and the area will be recontoured and

6 revegetated in accordance with a land management plan. A detailed closure schedule will be

7 submitted in writing to the Secretary of the NMED, along with the notification of closure.

8 Throughout the closure period, all-necessary steps will be taken to prevent threats to human

9 health and the environment in compliance with all applicable Resource Conservation and

Recovery Act (**RCRA**) permit requirements. Figure M-61G-3 presents an estimate of a final

11 facility closure schedule-based on 84 months to implement final closure.

12 The schedule for final facility closure is considered to be a best estimate because closure of the

facility is driven by policies and practices established for the decontamination, if necessary, and

decommissioning of radioactively contaminated facilities. These required activities include

extensive radiological contamination surveys and hazardous constituent surveys using, among

other techniques, radiological surveys to indicate potential hazardous waste releases. Both

types of surveys will be performed at <u>the all areas of the WIPP site where hazardous waste</u>

18 were managed<u>. as appropriate</u>. These surveys, along with historical radiological survey records,

19 will provide the basis for <u>determining the disposition</u>release of structures, equipment, and

components for<u>(i.e.,</u> disposal or decontamination for release off<u>-</u>-site<u>)</u>. Specifications will be
 developed for each structure to be removed. A cost benefit analysis maywill be needed to

evaluate decontamination options if extensive decontamination is necessary. Individual

evaluate decontamination options if extensive decontamination is necessary. Individual equipment surveys, structure surveys, and debris surveys <u>maywill</u> be required prior to

disposition. Size-reduction techniques may be required to dispose of mixed or radioactive waste

at the WIPP site. Current DOE policy requires the preparation of a final

decontamination decommissioning and decommissioning decontamination (**D&D**) plan

immediately prior to final facility closure. In this way, the specific conditions of the facility at the

time D&D is initiated will be addressed. Section G-1e($\frac{23}{23}$) provides a more detailed discussion of

²⁹ final facility closure activities.

³⁰ Figure <u>M-61</u>G-3 shows the schedule for the final facility closure consisting of decontamination,

as needed, of the TRU waste-handling equipment, and of the aboveground equipment and

facilities, including closure of surface HWMUs; decontamination of the shaft and haulage ways

33 (<u>if needed</u>); disposal of decontamination derived wastes in the last open underground HWDU;

and subsequent closure of this underground HWDU. Subsequent activities will include

installation of repository shaft seals.

36 An overall <u>A</u> schedule for final facility closure, showing <u>anticipated durations for</u>currently

³⁷ scheduled dates for the start and end of final facility closure activities_± is shown in Table G-2.

38 This schedule is based on notification of the intent to close as the initial activity, 60 days prior to

³⁹ the final facility closure start date. The dates assume a startup date of March 1999 and

40 continued permitting of the WIPP facility until it is filled. Schedule details for panel closures are

41 shown on Table G-1.

42 G-1d(3) Extension for Closure Time

As indicated by the closure schedule presented in Figure <u>M-61</u>G-3, the activities necessary to

44 perform facility closure of the WIPP facility may require more than 180 days to complete

45 because of additional stringent requirements for managing radioactive materials. Therefore, the

Permit provides an extension of the 180-day final closure requirement in accordance with

2 20.4.1.500 NMAC (incorporating 40 CFR §264.113). During the extended closure period, the

3 Permittees will continue to demonstrate compliance with applicable permit requirements and will

take <u>the all</u> steps necessary to prevent threats to human health and the environment as a result
 of TRU mixed waste management at the WIPP facility including all of the applicable measures

of TRU mixed waste management at the WIPP facility include
 in Permit Part 2.10, (Preparedness and Prevention).

In addition, according to the schedules in Figure M-61G-3, the final derived wastes that are 7 generated as the result of decontamination activities will not be disposed of for 16 months after 8 the initiation of final facility closure. In accordance with 20.4.1.500 NMAC (incorporating 40 CFR 9 §264.113(a)), the Permit provides an extension of the 90-day limit to dispose of final derived 10 waste resulting from the closure process. This provision is necessitated by the fact that the 11 radioactive nature of the derived waste makes placement in the WIPP repository the best 12 disposition, and the removal of these wastes will, by necessity, take longer than 90 days in 13 accordance with the closure schedules. During this extended period of time, the Permittees will 14 take the all steps necessary to prevent threats to human health and the environment, including 15 compliance with all-applicable permit requirements. These steps include all of the applicable 16 preparedness and prevention measures in Permit Part 2. Section 2.10, (Preparedness and 17 Prevention). 18

Finally, in the event the hazardous waste permit is not renewed as assumed in the schedule,
the Permittees will submit a modification to the Closure Plan to implement a contingency closure
that will allow the Permittees to continue to operate for the disposal of non-mixed TRU waste.
This modification will include a request for an extension of the time for final facility closure. This
modified Closure Plan will be submitted to the NMED for approval.

24 <u>G-1d(4)</u> Amendment of the Closure Plan

If it becomes necessary to amend the Closure Plan for the WIPP facility, the Permittees will
submit, in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.42), a written
notification of or request for a permit modification in accordance with 20.4.1.900 NMAC
(incorporating 40 CFR §270.42). This notification of, or request for, a permit modification will
describedescribing any change in operation or facility design that affects the Closure Plan. The
written notification of, or request for, a permit modification will include a copy of the amended
Closure Plan for approval by the NMED. The Permittees will submit a written notification of, or

request for, a permit modification to authorize a change in the approved plan, if:

- There are changes in operating plans or in the waste management unit facility design that affect the Closure Plan
- There is a change in the expected year of closure
- Unexpected events occur during panel or final facility closure that require modification of the approved Closure Plan
- Changes in State or Federal laws affect the Closure Plan
- Permittees fail to obtain permits for continued operations as discussed above

1 The Permittees will submit a written request for a permit modification with a copy of the

- 2 amended Closure Plan at least 60 days prior to the proposed change in facility design or
- 3 operation or within 60 days of the occurrence of an unexpected event that affects the Closure
- 4 Plan. If the unexpected event occurs during final closure, the permit modification will be
- 5 requested within 30 days of the occurrence. If the Secretary of the NMED requests a
- 6 modification of the Closure Plan, a plan modified in accordance with the request will be
- 7 submitted within 60 days of notification or within 30 days, if the change in facility condition
- 8 occurs during final closure.

9 <u>G-1e Closure Activities</u>

Closure activities include those instituted for panel closure (i.e., closure of filled underground 10 HWDUs), contingency closure (i.e., closure of surface HWMUs and decontamination of other 11 waste handling areas), and final facility closure (i.e., closure of surface HWMUs, D&D of surface 12 facilities and the areas surrounding the WHB, and placement of repository shaft seals). Panel 13 closure systems will be emplaced to separate areas of the facility and to isolate panels. Permit 14 Attachments G1 and G2 provide panel closure system and shaft seal designs, respectively. 15 <u>Closure</u>All closure activities will meet the applicable quality assurance (QA)/quality control (QC) 16 program standards in place at the WIPP facility. Facility monitoring procedures in place during 17 operations will remain in place through final closure, as applicable. 18

19 <u>G-1e(1) Panel Closure</u>

Following completion of waste emplacement in each underground HWDU, the HWDU will be 20 closed. A WIPP Panel Closure (WPC) will be emplaced in the panel access drifts, in accordance 21 with the design in Permit Attachment G1 and the schedule in Figure M-60G-2 and Table G-1. 22 Alternatively, panels may be closed simultaneously by placing panel closures in the north-south 23 mains (E-300, E-140, W-30, and W-170), as shown in Figure M-43G-1. If this alternative is used 24 to close Panels 3, 4, 5, and 6, then Panel 9 will not be used for TRU mixed waste disposal. The 25 panel closure system is designed to meet the following requirements that were established by 26 the DOE for the design to comply with 20.4.1.500 NMAC (incorporating 40 CFR §264.601(a)): 27

- the panel closure system shall contribute to meeting the closure performance standards
 in Permit Part 6, Section 6.10.1 by mitigating the migration of volatile organic
 compounds (VOCs) from closed panels
- the panel closure system shall consider potential flow of VOCs through the disturbed rock zone (**DRZ**) in addition to flow through closure components
- the panel closure system shall perform its intended functions under loads generated by
 creep closure of the tunnels
- the panel closure system shall perform its intended function under the conditions of a postulated thermal runaway involving nitrate salt bearing waste (Golder, 2016)
- the nominal operational life of the closure system is 35 years, however, the inspection
 and maintenance, if needed, of accessible bulkheads can continue until the initiation of
 final facility closure

- the panel closure system may require minimal maintenance per 20.4.1.500 NMAC 1 (incorporating 40 CFR 264.111) 2 the panel closure system shall address the expected ground conditions in the waste 3 • disposal area 4 the panel closure system shall be built of substantial construction and non-combustible 5 • material except for flexible flashing used to accommodate salt movement 6 the design and construction shall follow conventional mining practices 7 • structural analysis shall use data acquired from the WIPP underground 8 materials shall be compatible with their emplacement environment and function 9 • treatment of surfaces in the closure areas shall be considered in the design 10 a QA/QC program shall verify material properties and construction 11 construction of the panel closure system shall consider shaft and underground access • 12
- 13 and services for materials handling

The closure performance standard for air emissions from the WIPP facility is one excess cancer 14 death in one million and a hazard index (HI) of 1 for a member of the public living outside the 15 WIPP Site Boundary as specified in Permit Part 6, Section 6.10.1. Releases shall be below 16 these limits for the facility to remain in compliance with standards to protect human health and 17 the environment. The panel closure design has been shown, through analysis, to meet these 18 standards, if emplaced in accordance with the specifications in Permit Attachment G1. 19 Compliance will be demonstrated by the Repository VOC Monitoring Program (RVMP) in Permit 20 Attachment N. Compliance with the standards established for the RVMP constitutes compliance 21 with the closure standards in Permit Part 6, Table 6.10.1. 22

The design basis for this closure is such that the migration of hazardous waste constituents from closed panels during the operational and closure period would result in concentrations well below health-based standards. The source term used as the design basis included the average concentrations of VOCs from CH waste containers as measured in headspace gases through November 2010. The VOCs are assumed to have been released by diffusion through the container vents and are removed from the closed room by air leakage that occurs due to ventilation-related pressure differentials.

Figures G-4, G-4a, and G-5 show diagrams Diagrams of the panel closure design, the substantial barrier, and installation envelopes are depicted in Permit Attachment G1, Appendix <u>G1-B, Figure M-62, and Figure M-42</u>. Permit Attachment G1 provides the detailed design and the design analysis for the panel closure system. The Permittees shall use bulkheads as specified in Attachment G1 for the closure of filled panels. A run-of-mine (**ROM**) salt component will be included in the closure for Panel 9 and Panel 10. The substantial barrier in Figure <u>M-<u>62</u>G-4a will be installed in Panels 7 and 8.</u>

1 G-1e(2) Prerequisite Activities for Panel 6 Final Closure

- 2 The NMED-approved WIPP Nitrate Salt Bearing Waste Container Isolation Plan (DOE, 2015)
- 3 provides for performing prerequisite activities associated with ground control, equipment

4 readiness, work control authorization, and ventilation prior to construction of the final closure in

5 Panel 6. These activities are considered closure activities and will be completed in accordance

6 with the WIPP Nitrate Salt Bearing Waste Container Isolation Plan (DOE, 2015).

7 <u>G-1e(23)</u> Decontamination and Decommissioning

8 Decontamination is defined as those activities which are performed to remove contamination

9 from surfaces and equipment that are not intended to be disposed of at the WIPP facility. The

policy at the WIPP facility will be to decontaminate as many areas as possible or to fix the

contaminants to the surface so they are not easily removable, consistent with radiological

protection policy. Decontamination or fixing are part of closure activities and are a necessary

activity in the clean closure of the surface container management units. Decontamination or

14 fixing determinations are based upon radiological surveys.

¹⁵ Decommissioning is the process of removing equipment, facilities, or surface areas from further

use and closing the facility. Decommissioning is part of final facility closure only and will involve

the removal of equipment, buildings, closure of the shafts, and establishing active and passive

institutional controls for the facility. Passive institutional controls are not included in the Permit.

The objective of D&D activities at the WIPP facility is to return the surface to as close to the preconstruction condition as reasonably possible, while protecting the health and safety of the

public and the environment. Major activities required to accomplish this objective include, but

are not limited to the following:

- 1. Review of operational records for historical information on releases
- 24 2. Visual examination of surface structures for evidence of spills or releases
- 25 3. Performance of site contamination surveys
- Decontamination, if necessary, of usable equipment, materials, and structures including surface facilities and areas surrounding the WHB.
- Disposal of equipment/materials that cannot be decontaminated but that meet the
 treatment, storage, and disposal facility waste acceptance criteria (TSDF-WAC) in an
 underground HWDU
- 6. Emplacement of panel closure system in the last HWDU
- 32 7. Emplacement of shaft seals²

² For the purposes of planning, the conclusion of shaft sealing is used by the DOE as the end of closure activities and the beginning of the Post-Closure Care Period.

- 1 8. Regrading the surface to approximately original contours
- 2 9. Initiation of active controls

This Closure Plan will be amended prior to the initiation of final closure activities to specify the methods to be used.

5 G-1e(2)(a) Hazards Survey Health and Safety

Before final closure activities begin, radiation protection personnel will conduct a hazards survey 6 of the unit(s) being closed. A release of radionuclides could also indicate a release of hazardous 7 constituents. If radionuclides are not detected, sampling for hazardous constituents will still be 8 performed if there is documentation or visible evidence that a spill or release has occurred. The 9 purpose of the hazards survey will be to identify potential contamination concerns that may 10 present hazards to workers during the closure activities and to specify any control measures 11 necessary to reduce worker risk. This survey will provide the information necessary for the 12 health physics personnel to identify worker qualifications, personal protective equipment (PPE), 13 safety awareness, work permits, exposure control programs, and emergency coordination that 14 will be required to perform closure related activities. 15

16 <u>G-1e(23)(ba)</u> Determine the Extent of Contamination

The first activities performed as part of decontamination include those needed to determine the 17 extent of any contamination that needs to be removed or fixed prior to decommissioning a 18 facility. This includes activities 1 to 3 above and, as can be seen by the schedules in Figures M-19 60G-2 and M-61G-3 (Items B and C), these surveys are anticipated to take 10 months to 20 perform, including obtaining the results of any sample analyses. The process of identifying 21 areas that require decontamination or fixing include three sources of information. First, 22 operating records will be reviewed to determine where contamination has previously been found 23 as the result of historical releases and spills. Even though releases and spills in the above 24 ground storage units will have been cleaned up at the time of occurrence, newer equipment and 25 technology may allow further cleaning. Second, surfaces of facilities and structures will be 26 examined visually for evidence of spills or releases. Finally, extensive detailed contamination 27 surveys will be performed to document the level of cleanliness for surface structures and 28 equipment that are subject to decontamination. If equipment or areas are identified as 29 contaminated, the Permittees will notify NMED as specified in Permit Part 1, and a plan and 30 procedure(s) will be developed and implemented to address decontamination-related questions, 31 including: 32

• Should the component be decontaminated or disposed of as waste?

34

- What is the most cost-effective method of decontaminating the component?
- Will the decontamination procedures adequately contain the contamination?

Radiological and hazardous constituent surveys will be used in determining the presence of
 hazardous waste and hazardous waste residues in areas where spills or releases have
 occurred. Radiological surveys are described in Permit Attachment G3. For contamination that
 is cleaned up, once cleanup of the radioactivity has been completed, the surface will be
 sampled for <u>the</u> hazardous constituents <u>associated with the EPA Hazardous Waste Numbers</u>
 specified in Permit Attachment B to determine that they, too, have been cleaned up. Sampling
 and analysis protocols will be consistent with EPA's document SW-846 (EPA, <u>2015</u>1996).

1 <u>G-1e(23)(cb)</u> Decontamination Activities

Once the extent of contamination is known, radiological control activities (e.g., decontamination, 2 or-fixing) activities will be planned and performed. Consistent with radiological control 3 procedures pursuant to 10 CFR Part 835, decontamination activities will be performed, as 4 necessary. Hazardous waste decontamination, if needed, will be conducted in accordance with 5 the requirements of the Permit and the standards in 20.4.1.500 NMAC (incorporating 40 CFR 6 Part 264). Radiological control and the control of hazardous waste residues are the primary 7 criteria used in the design of decontamination activities. Radiological control procedures require 8 that careful planning and execution be used in decontamination activities to prevent the 9 exposure of workers beyond applicable standards and to prevent the further spread of 10 contamination. Careful control of entry, cleanup, and ventilation are vital components of 11 radiological control activities decontamination. The level of care mandated by DOE orders and 12 occupational protection requirements results in closure activities that will exceed the 180 days 13 allowed in 20.4.1.500 NMAC (incorporating 40 CFR §264.113(b)). Decontamination activities 14 are included as item 4 above and are shown on the schedules for contingency closure and final 15 facility closure (Figures G-2 and M-61G-3) as Activities activities D, E, and F. These activities 16 are anticipated to have a duration of 20 months for both contingency closure and for final facility 17 closure. The result of these activities is the clean closure of the surface container management 18 units. Under contingency closure, the other areas that have been decontaminated will not be 19 closed. Instead they will remain in use for continued waste management activities involving non-20 mixed waste. Under final facility closure, other areas that are decontaminated are eligible for 21 closure. 22

- 23 The operating philosophy of the WIPP Project, which is described as "Start Clean Stay Clean,"
- ²⁴ <u>is intended to minimize the will provide for minimum need for decontamination at closure</u>.
- However, the need for decontamination techniques may arise. <u>Decontamination activities are</u>
- 26 managed consistent with radiological control procedures pursuant to 10 CFR Part 835, which
- includes the as-low-as-reasonably-achievable (ALARA) principle. The ALARA principle is an
 approach/philosophy to radiation protection to manage and control exposures (both individual
- and collective) to the work force and to the general public to as low as is reasonable, taking into
- account social, technical, economic, practical, and public policy considerations. It is assumed
- that the process of localized surface decontamination will remove the hazardous waste
- 32 constituents along with the radioactive waste constituents.
- 33 Decontamination activities will be coordinated with closure activities so that areas that have
- been decontaminated will not be recontaminated. All waste<u>Waste</u> resulting from
- decontamination activities will be surveyed and analyzed for the presence of radioactive
- 36 contamination and a determination of the hazardous constituents associated with the EPA
- 37 <u>Hazardous Waste Numbers</u> specified in <u>Part A of the Permit Application</u> Permit Attachment B.
- ³⁸ The waste will be characterized as <u>non-radioactive/non-hazardous,</u> hazardous, mixed, or
- radioactive and will be packaged and handled appropriately. Mixed and radioactive waste,
- classified as TRU mixed waste, will be managed in accordance with the applicable Permit
- requirements. Derived mixed waste collected during decontamination activities that are
- 42 generated before repository shafts have been sealed will be emplaced in the facility, if
- 43 appropriate, or will be managed together with decontamination derived waste collected after the
- underground is closed. This waste will be classified and shipped off site to an appropriate,
- 45 permitted facility for treatment, if necessary, and for disposal.

1 Removal of Hazardous Waste Residues

Because of the type of waste management activities that will occur at the WIPP facility, waste 2 residues that may be encountered during the operation of the facility and at closure may include 3 derived waste. Derived wastes result from the management of the waste containers or may be 4 collected as part of the closure activities (such as those during which wipes were used to 5 sample the containers and equipment for potential radioactive contamination or those involving 6 solidified decontamination solutions, the handling of equipment designated for disposal, and the 7 handling of residues collected as a result of spill cleanup). Derived wastes collected during the 8 operation and closure of the WIPP facility will be identified and managed as TRU mixed wastes. 9 These wastes will be disposed in anthe active underground HWDU. Decontamination and 10 decommissioning derived wastes and equipment designated for disposal will be placed in anthe 11 last underground HWDU panel before closure of that unit. 12

13 Surface Container Storage Units

The procedures employed for waste receipt at the WIPP facility minimize the likelihood for any 14 waste spillage to occur on the surface outside the WHB. TRU mixed waste is shipped to the 15 WIPP facility in approved shipping containers (i.e., Contact-HandledCH or Remote-HandledRH 16 Packages) that are not opened until they are inside the WHB. Therefore, it is unlikely that soil in 17 the Parking Area Unit or elsewhere in the vicinity of the WHB will become contaminated with 18 TRU mixed waste constituents as a result of TRU mixed waste management activities. An 19 evaluation of the soils in the vicinity of the WHB will only be necessary if an event resulting in a 20 release of hazardous waste has occurred outside the WHB. 21

The "Start Clean—Stay Clean" operating philosophy of the WIPP Project will minimize the need for decontamination of the WHB during decommissioning and closure. Procedures for opening shipping containers in the WHB limit the opportunity for waste spillage.

25 Should the need for decontamination of the WHB arise, the following methods may be 26 employed, as appropriate, for the hazardous constituent/contaminant type and extent:

- Chemical cleaning (e.g., water, mild detergent cleanser, and polyvinyl alcohol)
- Nonchemical cleaning (e.g., sandblasting, grinding, high-pressure water spray, scabbler
 pistons and needle scalers, ice-blast technology, dry-ice blasting)
- Removal of contaminated components such as pipe and ductwork

Waste generated as a result of WHB decontamination activities will be managed as derived waste in accordance with applicable Permit requirements and will be emplaced in the last open underground HWDU for disposal.

34 Waste Handling Contaminated Underground Equipment

35 The waste Waste shaft Shaft conveyance, and associated waste handling equipment, and

36 <u>underground support equipment (e.g., mining equipment, carts) that has become contaminated</u>

with hazardous waste constituents associated with TRU mixed waste
 background or characterized and dispositioned
 (i.e., disposed of as derived waste) as part of

background or <u>characterized and dispositioned</u>be <u>(i.e.,</u> disposed <u>of</u> as derived waste) as part of
 both contingency and final facility closure. Procedures for detection and sampling will be as

described above. Equipment cleanup will be as above using chemical or nonchemical
 techniques.

3 Personnel Decontamination

Personal protective equipment (PPE) worn by personnel performing closure activities in areas
 determined to be contaminated will be disposed of appropriately. Disposable PPE used in such

areas will be placed into containers and managed as TRU mixed waste. Non-disposable PPE

7 will be decontaminated, if possible. Non-disposable PPE that cannot be decontaminated will be

8 managed as TRU mixed waste.

9 In accordance with DOE policy, TRU mixed waste PPE will be considered to be contaminated

10 with all of the hazardous waste constituents contained in the containers that have been

11 managed within the unit being closed. Wastes collected as a result of closure activities and that

may be contaminated with radioactive and hazardous constituents will be considered TRU

mixed wastes. These wastes will be managed as derived wastes<u>and disposed of in the final</u>

open underground HWDU, as described in Permit Attachment A2. Such waste, collected as the result of closure of the WIPP facility, will be disposed of in the final open underground HWDU.

16 Cleanup Criteria

- 17 Radiological decontamination will be <u>managed consistent with radiological control procedures</u>,
- ¹⁸ <u>or to less than or equal</u> whatever levels that may be established by DOE³ at the time of cleanup.
- 19 Hazardous waste decontamination will be conducted in accordance with standards in
- 20 20.4.1.500 NMAC (incorporating 40 CFR <u>Part §</u>264) or as incorporated into the Permit.
- 21 Final Contamination Sampling and Quality Assurance
- ²² Verification samples will be analyzed by <u>a</u>an approved laboratory that has been qualified by the

DOE according to a written program with strict criteria. The QA requirements of EPA/SW-846,

²⁴ "Test Methods for Evaluating Solid Waste" (EPA, <u>2015</u>1996), will be met for hazardous

constituent sampling and analyses.

26 Quality Assurance/Quality Control

27 Because decisions about closure activities may be based, in part, on analyses of samples of

potentially contaminated surfaces and media, a program to ensure reliability of analytical data is

essential. Data reliability will be ensured by following a QA/QC program that mandates

adequate precision and accuracy of laboratory analyses. Field documentation will be used to

document the conditions under which each sample is collected. The documented QA/QC

program in place at the WIPP facility will meet applicable RCRA QA requirements.

³³ Field blanks and duplicate samples will be collected in the field to determine potential errors

introduced in the data from sample collection and handling activities. To determine the potential

³⁵ for cross-contamination, rinsate blanks (consisting of rinsate from decontaminated sampling

³⁶ equipment) will be collected and analyzed <u>in accordance with applicable EPA guidance</u>. At least

³ Title 10 CFR Part 835

1 one rinsate blank will be collected for every 20 field samples. Duplicate samples will be

2 collected at a frequency of one duplicate sample for every ten field samples. In no case will less

3 than one rinsate blank or duplicate sample be collected for a field-sampling effort. These blank

4 and duplicate samples will be identified and treated as separate samples. Acceptance criteria

5 for QA/QC hazardous constituent sample analyses will adhere to the most recent version of

6 EPA SW-846 or other applicable EPA guidance.

7 G-1e(23)(de) Dismantling

8 <u>G-1e(23)(de)(1)</u> Dismantling During Final Closure

9 Final facility closure will include dismantling of structures on the surface and in the underground.

10 These are items 6 and 7 above and are represented as Activity G in the final facility closure

schedule in Figure <u>M-61</u>G-3. During dismantling, priority will be given to contaminated

12 structures and equipment that cannot be decontaminated to assure these are properly disposed

of in the remaining open underground HWDU in a timely manner. All such facilities and

equipment are expected to be removed and disposed of 16 months after the initiation of closure.

Dismantling of the balance of the facility, including those structures and equipment that are not

included in the application and are not used for TRU mixed waste management, is anticipated to

17 take an additional 66 months. <u>The</u>lt should be noted that the placement of D&D waste into the

18 final underground HWDU may, by necessity, involve the placement of uncontainerized bulk

¹⁹ materials such as concrete components, building framing, structural members, disassembled or

20 partially disassembled equipment, or containerized materials in non-standard waste boxes.

Such placement will only occur if it can be shown that it is protective of human health and the

22 environment and <u>will beall items are</u> described in an amendment to the Closure Plan.

Identification of bulk items is not possible at this time since their size and quantity will depend on

the extent of non-removable contamination.

<u>G-1e(23)(de)(2)</u> Dismantling of Permit-Related Surface Equipment, Structures, and <u>Contaminated Soils During Partial Closure</u>

Partial closure may include includes dismantling of Permit-related structures and/or equipment 27 and removal of contaminated soils on the surface prior to final closure. During dismantling, 28 priority will be given to structures and equipment contaminated with hazardous waste or 29 hazardous waste constituents that cannot be decontaminated due to the presence of 30 radioactivity to ensure these are properly disposed of at the WIPP facility or at another 31 designated disposal facility in a timely manner. It should be noted that the placement of D&D 32 waste into a WIPP HWDU may, by necessity, involve the placement of uncontainerized bulk 33 materials such as concrete components, building framing, structural members, disassembled or 34 partially disassembled equipment, or containerized materials in non-standard waste boxes. 35 Such placement will only occur if it can be shown that it is protective of human health and the 36 environment and items are described in the operating record. Identification of bulk items is not 37 possible at this time since their size and quantity will depend on the extent of non-removable 38

39 contamination.

40 <u>G-1e(23)(ed)</u> Closure of Open Underground HWDU

- ⁴¹ The closure of the final underground HWDU is shown by Activity H in Figure <u>M-61</u>G-3. This
- 42 closure will be consistent with the description in Section G-1e(1) and the design in Permit

Attachment G1. Detailed closure schedules for underground HWDUs are given in Figure \underline{M}_{-2} <u>60G-2</u> and Table G-1.

3 <u>G-1e(23)(fe)</u> Final Facility Closure

Final facility closure includes several activities designed to assure both the short-term isolation of the waste and the long-term integrity of the disposal system. These include the placement of plugs in boreholes that penetrate the salt and the placement of the repository sealing system. In addition, the surface will be returned to as near its original condition as practicable, and will be readied for the construction of markers and monuments that will provide permanent marking of the repository location and contents.

Figure <u>M-43</u>G-6 identifies where three existing boreholes overlie the proximate area of the repository footprint. Of these identified boreholes in Figure <u>M-43</u>G-6, all but ERDA-9 are terminated hundreds of feet above the repository horizon. Only ERDA-9, which is accounted for in long-term performance modeling, is drilled through the repository horizon, near the WIPP

- 14 <u>facility</u> excavations.
- 15 To mitigate the potential for migration beyond the repository horizon, the DOE has specified that

16 borehole seals be designed to limit the volume of water that could be introduced to the

17 repository from the overlying water-bearing zones and to limit the volume of contaminated brine

released from the repository to the surface or water-bearing zones.

Borehole plugging activities have been underway since the 1970s, from the early days of the development of the WIPP facility. Early in the exploratory phase of the project, a number of boreholes were sunk in Lea and Eddy counties. After the WIPP site was situated in its current location, an evaluation of all-vertical penetrations was made by Christensen and Peterson (1981).

As an initial criterion, any borehole that connects a fluid-producing zone with the repository horizon becomes a plugging candidate.

Grout plugging procedures are routinely performed in standard oil-field operations; however, 26 quantitative measurements of plug performance are rarely obtained. The Bell Canyon Test 27 reported by Christensen and Peterson (1981) was a field test demonstration of the use of 28 cementitious plugging materials and modification of existing industrial emplacement techniques 29 to suit repository plugging requirements. Cement emplacement technology was found to be 30 "generally adequate to satisfy repository plugging requirements." Christensen and Peterson 31 (1981) also report "that grouts can be effective in sealing boreholes, if proper care is exercised 32 in matching physical properties of the local rock with grout mixtures. Further, the reduction in 33 fluid flow provided by even limited length plugs is far in excess of that required by bounding 34 safety assessments for the WIPP." The governing regulations for plugging and/or abandonment 35 of boreholes are summarized in Table G-3. 36

The proposed repository sealing system design will prevent water from entering the repository and will prevent gases or brines from migrating out of the repository. The proposed design includes the following subsystems and associated principal functions:

• Near-surface: to prevent subsidence at and around the shafts

- Rustler Formation: to prevent subsidence at and around the shafts and to ensure compliance with federal and New Mexico groundwater protection requirements
 - Salado: to prevent transporting hazardous waste constituents beyond the point of compliance specified in Permit Part 5

The repository sealing system will consist of natural and engineered barriers within the WIPP repository that will withstand forces expected to be present because of rock creep, hydraulic pressure, and probable collapses in the repository and will meet the closure requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.601 and §264.111). Permit Attachment G2 presents the final repository sealing system design.

Once shaft sealing is completed, the Permittees will consider closure complete and will provide the NMED with a certification of such within 60 days.

12 G-1e(23)(gf) Final Contouring and Revegetation

3

4

In the preparation of its Final Environmental Impact Statement (DOE, 1980), the DOE 13 committed to restore the site to as near to its original condition as is practicable. This involves 14 removal of access roads, unneeded utilities, fences, and any other structures built by the DOE 15 to support WIPP operations. Provisions would be left for active post-closure controls of the site 16 and for the installation of long-term markers and monuments for the purpose of permanently 17 marking the location of the repository and waste. Permit Attachment H. Section H-1a(1) 18 discusses the active and long-term controls proposed for the WIPP facility. Installation of 19 borehole seals are anticipated to take 12 months, shaft seals 52 months, and final surface 20 contouring 8 months. 21

22 <u>G-1e(23)(hg)</u> Closure, Monuments, and Records

A record of the WIPP <u>facility</u>Project shall be listed in the public domain in accordance with the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.116). Active access controls will be employed for at least the first 100 years after final facility closure. In addition, a passive control system consisting of monuments or markers will be erected at the site to inform future generations of the location of the WIPP repository (see "Permanent Marker Conceptual Design Report" [DOE, <u>1995</u><u>1996</u>]).

This Permit requires only a 30-year post-closure period. This is the maximum post-closure time frame allowed in an initial Permit for any facility, as specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.117(a)). The Secretary of the NMED may shorten or extend the post-closure care period at any time in the future prior to completion of the original post-closure period (30 years after the completion of construction of the shaft seals). The Permanent Marker Conceptual Design Report and other provisions during the first 100 years after closure are addressed under another federal regulatory program.

- ³⁶ Closure of the WIPP facility will contribute to the following:
- Prevention of the intrusion of fluids into the repository by sealing the shafts
- Prevention of human intrusion after closure
- Minimization of future physical and environmental surveillance

1 Detailed records shall be filed with local, state, and federal government agencies to ensure that

- 2 the location of the WIPP facility is easily determined and that appropriate notifications and
- 3 restrictions are given to anyone who applies to drill in the area. This information, together with
- 4 land survey data, will be on record with the U.S. Geological Survey and other agencies. The
- 5 federal government will maintain permanent administrative authority over those aspects of land
- 6 management assigned by law. Details of post-closure activities are in Permit Attachment H.

7 G-1e(<u>34</u>) Performance of the Closed Facility

- 8 20.4.1.500 NMAC (incorporating 40 CFR §264.601) requires that a miscellaneous unit be
- 9 closed in a manner that protects human health and the environment. The RCRA Part B permit
- application addressed the expected performance of the closed facility during the 30-year post
- closure period. Groundwater monitoring will provide information on the performance of the
- closed facility during the post-closure care period, as specified in <u>Permit Attachment H,</u> Section
- 13 H-1a(2) (Monitoring) of Permit Attachment H.
- 14 The principal barriers to the movement of hazardous constituents from the facility or the
- movement of waters into the facility are the halite of the Salado (natural barrier) and the

repository seals (engineered barrier). Data and calculations that support this discussion arewere

- 17 presented in <u>Renewal Application Addendum N1 (DOE, 2020)</u>the permit application. The
- 18 majority of the calculations performed for the repository are focused on long-term performance
- and making predictions of performance over <u>the first 300-years of the 10,000-</u>-years
- 20 <u>performance assessment</u>. In the short term <u>(300 years)</u>, the repository is reaching a steady
- state configuration where the hypothetical brine inflow rate is affected by the increasing pressure in the repository due to gas generation and creep closure. These three phenomena
- pressure in the repository due to gas generation and creep closure. These three phenomena
 are related in the numerical modeling performed to support the permit application. The modeling
- parameters, assumptions and methodology <u>arewere</u> described in detail in <u>Renewal Application</u>
- Addendum N1 (DOE, 2020)the permit application.

26 G-2 Notices Required for Disposal Facilities

27 <u>G-2a</u> Certification of Closure

Within 60 days after completion of closure activities for a HWMU (i.e., for each storage unit and each disposal unit), the Permittees will submit to the Secretary of the NMED a certification that the unit (and, after completion of final closure, the facility) has been closed in accordance with the specifications of this Closure Plan. The certification will be signed by the Permittees and by an independent New Mexico registered professional engineer. Documentation supporting the independent registered engineer's certification will be furnished to the Secretary of the NMED with the certification.

35 G-2b Survey Plat

Within 60 days of completion of closure activities for each underground HWDU, and no later than the submission of the certification of closure of each underground HWDU, the Permittees will submit to the Secretary of the NMED a survey plat indicating the location and dimensions of hazardous waste disposal units with respect to permanently surveyed benchmarks. The plat will be prepared and certified by a professional land surveyor and will contain a prominently displayed note that states the Permittees' obligation to restrict disturbance of the hazardous

- waste disposal unit. In addition, the land records in the Eddy County Courthouse, Carlsbad, New Mexico, will be updated through filing of the final survey plats.

1 References

- 2 Christensen, C. L., and Peterson, E. W. 1981. "Field-Test Programs of Borehole Plugs in
- 3 Southeastern New Mexico." In The Technology of High-Level Nuclear Waste Disposal
- 4 Advances in the Science and Engineering of the Management of High-Level Nuclear Wastes, P.
- 5 L. Hofman and J. J. Breslin, eds., SAND79-1634C, DOE/TIC-4621, Vol. 1, pp. 354–369.
- 6 Technical Information Center of the U.S. Department of Energy, Oak Ridge, TN.
- 7 DOE, see U.S. Department of Energy
- 8 EPA, see U.S. Environmental Protection Agency
- 9 Golder Associates Inc. $(Golder)_{\pm^{-}} 2016_{\pm^{-}}$ Design Report WIPP Panel Closure report number
- 10 0632213 R1 Rev 1, Lakewood, Colorado, October 2016.
- U.S. Department of Energy, 1980, "Final Environmental Impact Statement, Waste Isolation Pilot
 Plant," DOE/EIS 0026, U.S. Department of Energy, Washington, D.C.
- 13 U.S. Department of Energy, 1997, Resource Conservation and Recovery Act Part B Permit
- Application, Waste Isolation Pilot Plant (WIPP), Carlsbad, New Mexico, Revision 6.5, 1997,
- 15 Chapters D and I.
- 16 U.S. Department of Energy, 1995, "Permanent Marker Conceptual Design Report," from
- 17 Appendix PMR of the Draft Compliance Certification Application, Draft-DOE/CAO-2056, U.S.
- 18 Department of Energy, Carlsbad, NM.U.S. Department of Energy, 1996, "Passive Institutional
- 19 <u>Controls Conceptual Design Report,</u> from Appendix PIC of the Compliance Certification
- 20 Application, DOE/CAO 1996-2184, U.S. Department of Energy, Carlsbad, NM.
- <u>U.S. Department of Energy, 2020, WIPP Hazardous Waste Facility Permit Renewal Application,</u>
 <u>Carlsbad, New Mexico, March 2020.</u>
- U.S. Department of Energy, 2015, "WIPP Nitrate Salt Bearing Waste Container Isolation Plan,
- 24 Revision 2, Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number:
- 25 NM4890139088-TSDF," May 29, 2015, U.S. Department of Energy, Carlsbad, NM.
- U.S. Environmental Protection Agency, <u>2015</u>1996, "Test Methods for Evaluating Solid Waste,"
- 27 SW-846, U.S. Environmental Protection Agency, Washington, D.C.
- 28

2	TABLES
---	--------

HWDU	Operations Start	Operations End	Closure Start ^a	Closure End ^b
PANEL 1	3/99*	3/03*	3/03*	7/03* SEE NOTE 1
PANEL 2	3/03*	10/05*	10/05*	3/06* SEE NOTE 1
PANEL 3	4/05*	2/07*	2/07*	8/19*
PANEL 4	1/07*	5/09*	5/09*	8/19*
PANEL 5	3/09*	7/11*	7/11*	8/19*
PANEL 6	3/11*	1/14*	1/14*	8/19*
PANEL 7	9/13*	<u>8/21</u> 7/21	<u>9/21</u> 8/21	<u>2/22</u> 1/22
PANEL 8	<u>8/21</u> 7/21	<u>8/25</u> 8/24	<u>9/25</u> 9/24	<u>2/26</u> 2/25
PANEL 9**	N/A	N/A	N/A	N/A
PANEL 10	<u>8/25</u> 1/28	9/30	10/30	<u>3/31</u> SEE NOTE 2
ADDITIONAL <u>HWDUs^c</u>	<u>SEE NOTE 2</u>	<u>SEE NOTE 2</u>	<u>SEE NOTE 2</u>	<u>SEE NOTE 2</u>

Table G-1 Anticipated Earliest Closure Dates for the Underground HWDUs

* Actual month and year

** Panel 9 was not used for TRU mixed waste disposal. Closures for Panels 3, 4, 5 and 6 were placed in the northsouth mains (E-300, E-140, W-30 and W-170), as shown in Figure G-1, pursuant to Section G-1e(1).

^a The point of closure start is defined as 60 days following notification to the NMED of closure.

^b The point of closure end is defined as 180 days following placement of final waste in the panel.

<u>Additional HWDUs may be authorized under a future modification to this Permit in accordance with Permit Part 1,</u> Section 1.3.1. This table row is a placeholder for planning purposes only, as stated in Attachment G, Section G-1c.

NOTE 1: Installation of the 12-foot explosion-isolation wall for Panels 1 and 2, -2, and -5 has been completed. Final closure of Panels 1 and 2 will be completed as specified in this Permit no later than June 30, 2020.

NOTE 2: The time to close these areas may be extended depending on the nature and extent of the disturbed rock zone. The excavations that constitute these panels will have been opened for as many as 40 years so that the preparation for closure may take longer than the time allotted in Figure G-2. If this extension is needed, it will be requested as an amendment to the Closure Plan.NOTE 2: For the purposes of preparing the closure schedule, the "Operations Start" date for each additional HWDU is the same as the "Operations End" date of the immediately prior HWDU. The "Operations End" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure Start" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure End" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure End" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure End" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure End" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure End" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure End" date for each additional HWDU is 1 2021 (see Renewal Application Addendum G1, DOE, 2020).

N/A--Not Applicable

1

 Table G-2

 Anticipated Overall Schedule for Final Facility Closure Activities

	Final Facility Closure Durations	
Activity	Start <u>Month</u>	Stop <u>Duration</u>
Notify NMED of Intent to Close WIPP (or to Implement Contingency Closure)	Month -2October 2030	N/A
Perform Contamination Surveys in both Surface Storage Areas	Month 0 October 2030	<u>6 Months</u> April 2031
Sample Analysis	Month 2 December 2030	8 MonthsJuly 2031
Decontamination as Necessary of both Surface Storage Areas	Month 8June 2031	<u>8 MonthsJanuary 2032</u>
Final Contamination Surveys of both Surface Storage Areas	Month 16February 2032	8 MonthsSeptember 2032
Sample Analysis	Month 20June 2032	8 Months January 2033
Prepare and Submit Container Management Unit Closure Certification	Month 28February 2033	4 MonthsMay 2033
Dispose of Closure-Derived Waste	Month 2November 2030	<u>14 Months</u> January 2032
Closure of Open Underground HWDU panel	Month 16February 2032 [*]	8 MonthsSeptember 2032
Install Borehole Seals	Month 24October 2032	<u>12 Months</u> September 2033
Install Repository Seals	Month 32June 2033	52 MonthsSeptember 2037
Recontour and Revegetate	Month 84October 2037	8 Months May 2038
Prepare and Submit Final (Contingency) Closure Certification	Month 84October 2037	2 Months May 2038
Post-closure Monitoring	Month 86July 2038	Up to 30 YearsN/A

N/A--Not Applicable

Refer to Figures M-61G-3 and Permit Attachment G1, Appendix G1-BG-4 for precise activity titles.

*This assumes the final waste is placed in this unit in January 2032 and notification of closure for this HWDU is submitted to the NMED in December 2031.

3

 Table G-3

 Governing Regulations for Borehole Abandonment

Federal or State Land	Type of Well or Borehole	Governing Regulation	Summary of Requirements
Both	Groundwater Surveillance	State and Federal regulation in effect at time of abandonment	Monitor wells no longer in use shall be plugged in such a manner as to preclude migration of surface runoff or groundwater along the length of the well. Where possible, this shall be accomplished by removing the well casing and pumping expanding cement from the bottom to the top of the well. If the casing cannot be removed, the casing shall be ripped or perforated along its entire length if possible, and grouted. Filling with bentonite pellets from the bottom to the top is an acceptable alternative to pressure grouting.
Federal	Oil and Gas Wells	43 CFR Part 3160, §§ 3162.3-4	The operator shall promptly plug and abandon, in accordance with a plan first approved in writing or prescribed by the authorized officer.
Federal	Potash	43 CFR Part 3590, § 3593.1	(b) Surface boreholes for development or holes for prospecting shall be abandoned to the satisfaction of the authorizing officer by cementing and/or casing or by other methods approved in advance by the authorized officer. The holes shall also be abandoned in a manner to protect the surface and not endanger any present or future underground operation, any deposit of oil, gas, or other mineral substances, or any aquifer.
State	Oil and Gas Well Outside the Oil- Potash Area	State of New Mexico, Oil Conservation Division, Rule 202 (eff. 3-1- 91)	 B. Plugging (1) Prior to abandonment, the well shall be plugged in a manner to permanently confine all oil, gas, and water in the separate strata where they were originally found. This can be accomplished by using mud-laden fluid, cement, and plugs singly or in combination as approved by the Division on the notice of intention to plug.
			(2) The exact location of plugged and abandoned wells shall be marked by the operator with a steel marker not less than four inches (4") in diameter, set in cement, and extending at least four feet (4') above mean ground level. The metal of the marker shall be permanently engraved, welded, or stamped with the operator name, lease name, and well number and location, including unit letter, section, township, and range.
State	Oil and Gas Wells Inside the Oil- Potash Area	State of New Mexico, Oil Conservation Division, Order No. R-111-P (eff. 4-21-88)	 F. Plugging and Abandonment of Wells (1) All existing and future wells that are drilled within the potash area, shall be plugged in accordance with the general rules established by the Division. A solid cement plug shall be provided through the salt section and any water-bearing horizon to prevent liquids or gases from entering the hole above or below the salt selection. It shall have suitable proportions—but no greater than three (3) percent of calcium chloride by weight—of cement considered to be the desired mixture when possible.

FIGURES

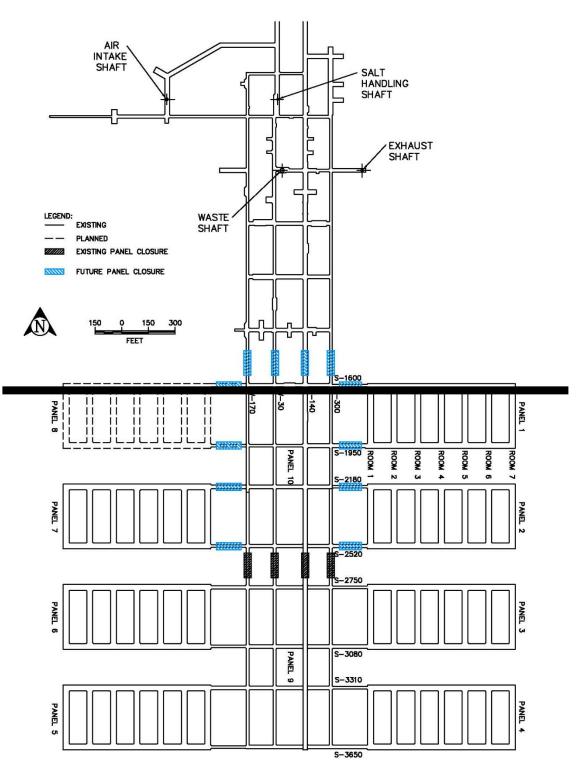


Figure G-1 Location of Underground HWDUs and WPC Locations

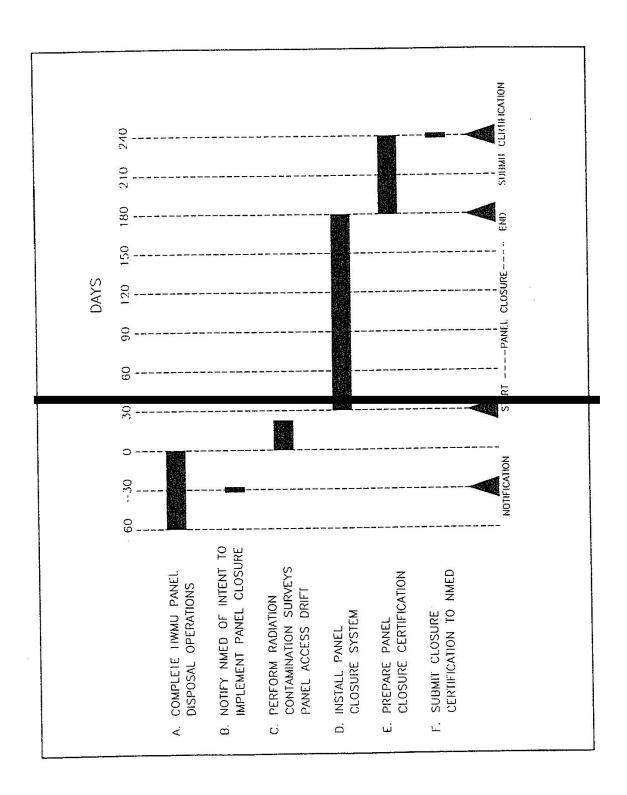


Figure G-2 WIPP Panel Closure Schedule

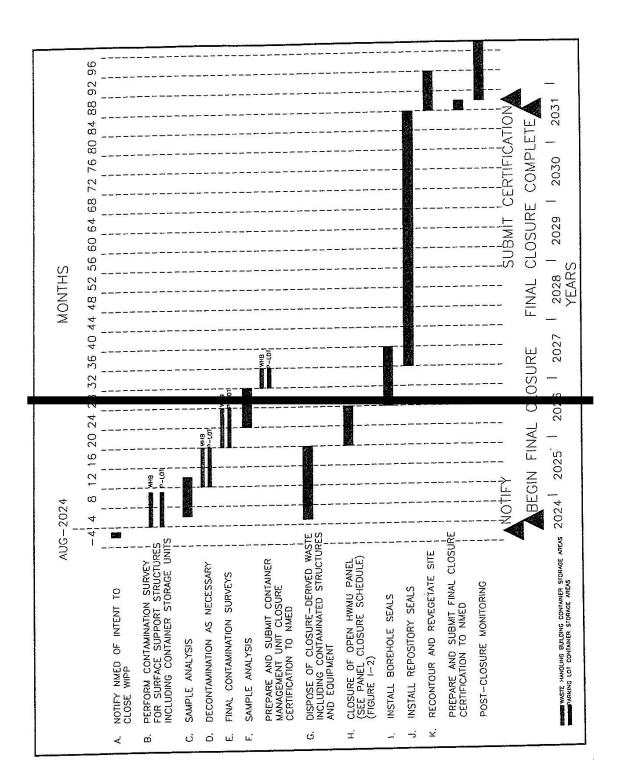


Figure G-3 WIPP Facility Final Closure 84-Month Schedule

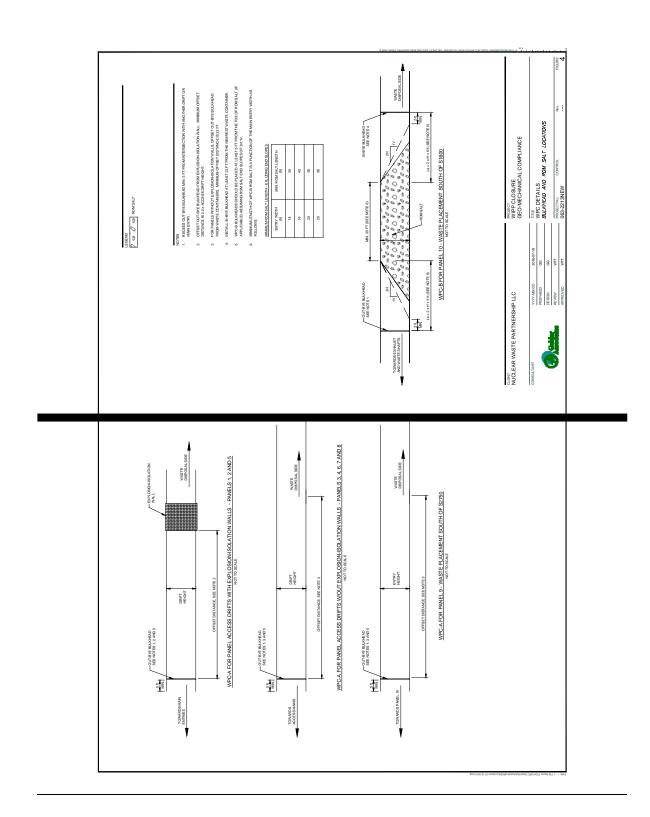
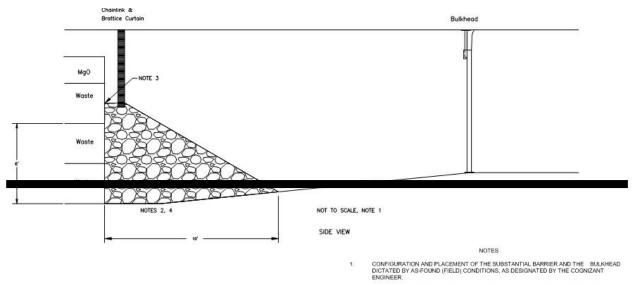
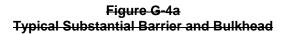


Figure G-4 Bulkhead and ROM Salt Locations



- 2. SUBSTANTIAL BARRIER MATERIAL WILL CONSIST OF RUN-OF-MINE SALT OR OTHER SUITABLE NON-FLAMMABLE MATERIAL AS DESIGNATED BY THE COGNIZANT ENGINEER.
- SUBSTANTIAL BARRIER MATERIAL SHOULD BE AGAINST THE WASTE FACE. THE HEIGHT OF THE SUBSTANTIAL BARRIER NEAR THE WASTE WILL BE AT LEAST EQUAL TO THE HEIGHT OF THE BOTTOM OF THE TOP ROW OF WASTE.
- DIMENSIONS INDICATED ARE MINIMUMS. THE HEIGHT OF THE SUBSTANTIAL BARRIER IS MEASURED AT THE WASTE FACE. THE LENGTH OF THE SUBSTANTIAL BARRIER IS MEASURED FROM THE BOTTOM OF THE WASTE FACE TO THE TOE OF THE SUBSTANTIAL BARRIER MATERIAL.



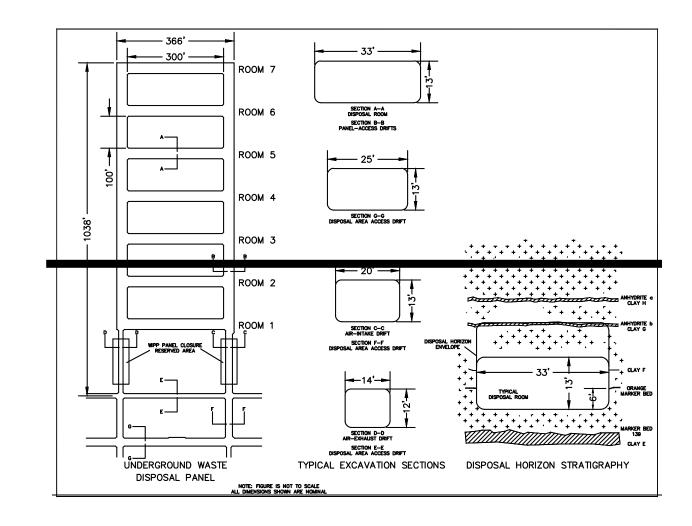


Figure G-5 Typical Disposal Panel

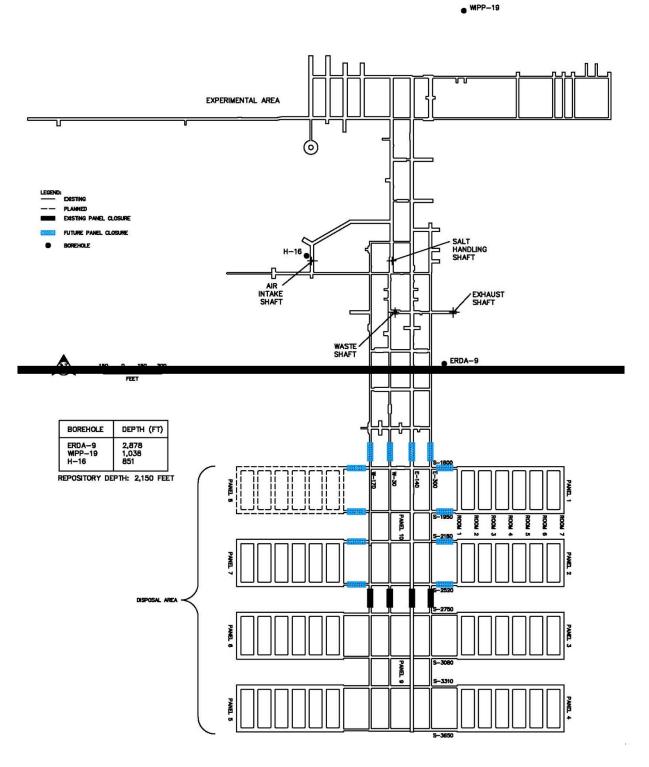


Figure G-6 Approximate Locations of Boreholes in Relation to the WIPP Underground

ATTACHMENT G1

WIPP PANEL CLOSURE DESIGN DESCRIPTION AND SPECIFICATIONS

Adapted from the October 2016 Design Report - WIPP Panel Closure

ATTACHMENT G1

WIPP PANEL CLOSURE DESIGN DESCRIPTION AND SPECIFICATIONS

TABLE OF CONTENTS

G1-1	Introduction	.4
	WPC Description G1-2a Permit Design Requirements G1-2b Design Component Descriptions G1-2b(1) Steel Bulkhead G1-2b(2) ROM Salt	.4 .4 .4 .5
G1-3	Constructability	.5
G1-4	Technical Specifications	.6
G1-5	Drawings	.6
G1-6	References	.6

1		LIST OF TABLES
2	Table	Title
3 4 5		WIPP Panel Closure Technical Specifications WIPP Panel Closure Drawings
6		LIST OF FIGURES
7	Figure	Title
8 9 10 11	Figure G1-2	WPC Locations WPC Details – Bulkhead and ROM Salt Locations WPC Details – Bulkhead Front-View and Attachment Detail
12		LIST OF APPENDICES
13 14 15	Appendix G1- Appendix G1-	•

1		LIST OF ABBREVIATIONS/ACRONYMS
2	Permit	WIPP Hazardous Waste Facility Permit
3 4	RCRA ROM	Resource Conservation and Recovery Act run-of-mine
5	VOC	volatile organic compound
6 7	WIPP WPC	Waste Isolation Pilot Plant WIPP Panel Closure
0		

ATTACHMENT G1

2 WIPP PANEL CLOSURE DESIGN DESCRIPTION AND SPECIFICATIONS

3 G1-1 Introduction

1

4 An important aspect of repository operations at the Waste Isolation Pilot Plant (WIPP) facility is the closure of waste disposal panels, also referred to as Hazardous Waste Disposal Units 5 (HWDUs), under the Resource Conservation and Recovery Act-(RCRA). Each of Panels 1 6 through 8 consists of a panel air-intake drift, a panel air-exhaust drift, and seven rooms. Panels 7 9 and 10 consist of the main entries (North to South) and cross entries (East to West). The 8 closure of individual panels shall meet the closure requirements described in Attachment G and 9 shall be built in accordance with the specifications in this attachment. This attachment describes 10 the panel closure design and presents the applicable specifications and requirements for 11 fabrication, installation, and maintenance of the WIPP Panel Closure (WPC). 12

The design discussed in this attachment is based on the Design Report, prepared by Golder 13 Associates (Golder, 2016). Calculations demonstrating compliance with the volatile organic 14 compounds (VOC) emission standards are included with the Design Report. Calculations 15 addressing the performance of the WPC under the geometries in the access drifts and main 16 entries, including an assessment of the required length of the run-of-mine (ROM) salt 17 component, are also included in the Design Report. The specifications for standard steel 18 bulkheads and ROM salt are included as Attachment G1 Appendix G1-A Technical 19 Specifications and Attachment G1 Appendix G1-B Drawings. 20

21 G1-2 WPC Description

- The WPC consists of WPC-A and WPC-B. The WPC-A is the design for Panels 1 through 8.
 They shall be closed using out-bye bulkheads in the panel intake and exhaust drifts. The
 WPC-A <u>with ROM salt</u> is also installed in Panel 9 in the main entries between S-2750 and
 S-2520 as the closures for Panels 3 through 6. The WPC-B is the closure design for Panel 10. It
 consists of a combination of in-bye and out-bye bulkheads and a length of ROM salt placed in
 the main entries north of S-1600. The WPC locations are depicted in <u>Permit Attachment G1.</u>
 <u>Appendix G1-B</u>Figure G1-1.
- 29 G1-2a Permit Design Requirements
- The applicable design requirements are provided in Permit Attachment G, Section G-1e(1). The WPC meets these design requirements as documented in the Design Report.

32 G1-2b Design Component Descriptions

- The following subsections present a description of the WPC components. Individual
- 34 specifications address shaft and underground access and materials handling, construction
- quality control, treatment of surfaces in the closure areas, and applicable design and
 construction standards.
- 27 The WPC-A consists of a standard staal bulkhood in the papel access drift
- The WPC-A consists of a standard steel bulkhead in the panel access drifts for Panels 1 through 8, near the intersection with the main entries or relocated to the main north-south drifts
- as determined by the geotechnical engineer. This bulkhead is referred to as the closure/out-bye

1 bulkhead and it will be maintained for as long as it is accessible. Additional ventilation barriers

- 2 may remain in the panels as part of the operational controls prior to WPC installation. These
- 3 ventilation barriers include steel bulkheads, brattice cloth and chain link, as well as concrete

4 block walls in Panels 1, 2, and 5. These ventilation barriers are not part of the WPC design and

5 will not impact the WPC-A bulkheads nor will they impede construction and maintenance of

6 closure bulkheads. WPC-A with ROM salt has been will also be emplaced in the main entries

7 between Panels 9 and 10 (between S-2520 and S-2750).

8 The WPC-B design for the closure installed in the main entries north of Panel 10 (north of

S-1600) consists of ROM salt between in-bye and out-bye bulkheads as shown in <u>Permit</u>
 <u>Attachment G1, Appendix G1-B</u>Figure G1-2.

11 G1-2b(1) Steel Bulkhead

A bulkhead (shown in Permit Attachment G1, Appendix G1-BFigure G1-3) serves to close 12 panels by blocking ventilation to the intake and exhaust access drifts of the panel and 13 preventing personnel access. This use of a bulkhead is a standard practice and the closure 14 bulkhead shall be constructed as a typical WIPP facility bulkhead. The bulkhead will consist of a 15 steel member frame covered with sheet metal. Telescoping tubular steel or functionally 16 equivalent material shall be used to bolt the bulkhead to the floor and roof. Flexible flashing 17 material such as a rubber conveyor belt (or other appropriate material) will be attached to the 18 steel frame and the salt as a gasket, thereby providing an effective yet flexible blockage to 19 ventilation air. The steel bulkheads will be maintained for as long as they are accessible to 20 workers. In this regard, accessible bulkheads will be repaired, renovated, or replaced as 21 required. Permit Attachment E, Table E-1 provides the schedule for inspecting panel closure 22

23 bulkheads.

24 G1-2b(2) ROM Salt

Run-of-mine salt material from mining operations will be used in the main entries north of

Panel 10. The salt will be emplaced to a specified design length based on geomechanical

27 calculations described in detail in the Design Report.

28 <u>G1-3 Constructability</u>

The WPC-A and WPC-B can be constructed using available technologies for the construction of bulkheads. The use of bulkheads is a standard practice at the WIPP facility and the closure bulkheads will be constructed as typical WIPP facility bulkheads. Run-of-mine salt is available from mining operations in sufficient quantities. The construction methods and materials required for the ROM salt placement north of Panel 10 will use available technologies as discussed in the Design Report.

Conventional WIPP facility mining practices will be used for the WPC construction. Work

packages will be prepared for the fabrication and installation of steel bulkheads and will list the

materials used, the equipment used, special precautions, and limitations. Each work package

38 will address location-specific prerequisites for installing the closure components, will contain the

³⁹ bulkhead specifications, as appropriate, and the location where the closure components are to

40 be installed. Details on the conventional mining practices and work package preparation are

- discussed in the Design Report and, further construction details are given in the technical
- 42 specifications included in Attachment G1, Appendix G1-A.

1 G1-4 Technical Specifications

- The technical specifications are included in Attachment G1, Appendix G1-A, and are listed in
 Table G1-1.
- 4 G1-5 Drawings
- 5 The drawings are included in Attachment G1, Appendix G1-B and are listed in Table G1-2.

6 G1-6 References

- 7 Golder Associates Inc. $(Golder)_{\pm \overline{}} 2016_{\pm \overline{}}$ Design Report WIPP Panel Closure report number
- 8 0632213 R1 Rev 1, Lakewood, Colorado, October 2016.

TABLES

Division 1 – General Requirements		
Section 01010	Summary of Work	
Section 01090	Reference Standards	
Section 01400	Contractor Quality Control	
Section 01600	Material and Equipment	
Division 2 – Site Work		
Section 02010	Mobilization and Demobilization	
Section 02222	Excavation	
Division 3 – WPC Components		
Section 03100	Run-of-Mine Salt	
Section 03200	Steel Bulkheads	

Table G1-1		
WIPP Panel Closure Technical Specifications		

| 1

Table G1-2 WIPP Panel Closure Drawings

Drawing Number	Title
262-001	WIPP Panel Closure (WPC) Title Sheet
262-002	WPC Locations
262-003	Typical Panel Layout and Mined Entry Cross-Sections
262-004	WPC Details – Bulkhead and ROM Salt Locations
262-005	WPC Details – Bulkhead Front-View and Attachment Detail

1 2 I

FIGURES

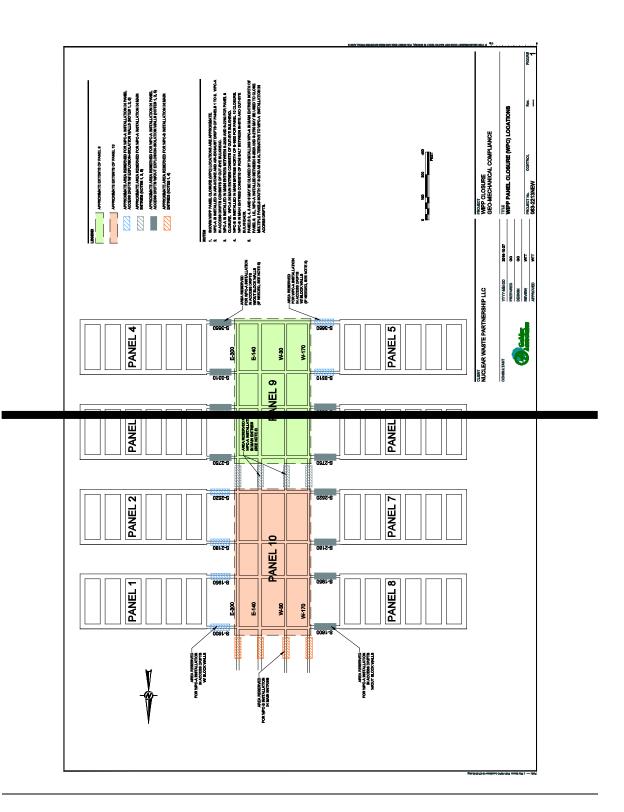


Figure G1-1 WPC Locations

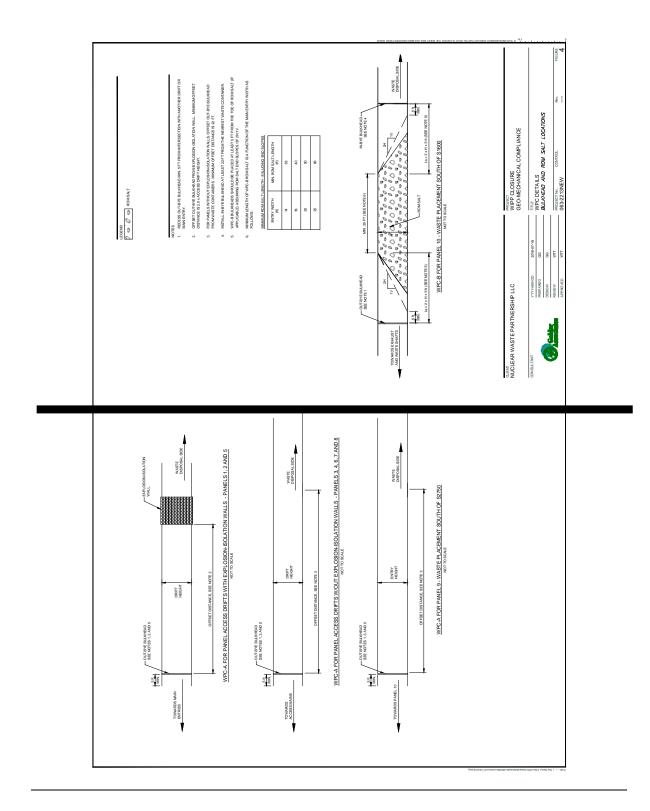


Figure G1-2 WPC Details – Bulkhead and Run-of-Mine Salt Locations

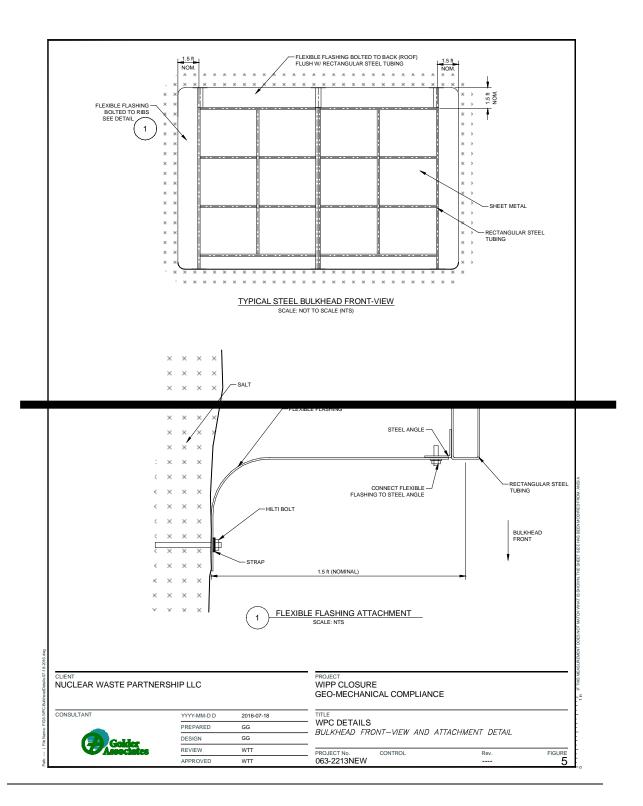


Figure G1-3 WPC Details – Bulkhead Front-View and Attachment Detail

ATTACHMENT G1 APPENDIX G1-A

TECHNICAL SPECIFICATIONS

WIPP PANEL CLOSURE WASTE ISOLATION PILOT PLANT CARLSBAD, NEW MEXICO

ATTACHMENT G1 APPENDIX G1-A

TECHNICAL SPECIFICATIONS

TABLE OF CONTENTS

DIVISION 1 – GENERAL REQUI	REMENTS	4
Section 01010 – Summar	y of Work	5
	·	
1.1	Scope	5
1.2	Scope of Work	
1.3	Definitions and Abbreviations	
1.4	List of Drawings	
1.5	Work by Others	
1.6	Contractor's Use of Site	
1.7	Contractor's Use of Facilities	
1.8	Work Sequence	
1.9	Work Plans	9
1.10	Health and Safety Plan (HASP)	9
1.11	Contractor Quality Control Plan (CQCP)	
1.12	Submittals	10
Part 2 – Products.		
	۱	
	ce Standards	
1.1	Scope	11
1.2	Quality Assurance	
1.3	Schedule of References	
Part 2 – Products.		12
Part 3 – Executior	۱	12
	or Quality Control	
	· · · · · · · · · · · · · · · · · · ·	
1.1	Scope	13
1.2	Related Sections	
1.3	Contractor Quality Control Plan (CQCP)	13
1.4	References and Standards	
1.5	Quality Assurance	14
1.6	Tolerances	14
1.7	Testing Services	14
1.8	Inspection Services	14
1.9	Submittals	14
Part 2 – Products.		15
Part 3 – Executior	۱	15
3.1	General	15
3.2	Contractor Quality Control Plan	15
3.3	Tests	
3.4	Testing Laboratory	17
3.5	Inspection Services	4 -

3.6	Completion Inspection	17
3.7	Documentation	
3.8	Notification of Noncompliance	
	and Equipment	
1.1	Scope	
1.2	Related Sections	
1.3	Equipment	
1.4	Products	
1.5	Transportation and Handling	
1.6	Storage and Protection	
1.7	Substitutions	
Part 3 – Execution	1	20
DIVISION 2 - SITE WORK		21
	ion and Demobilization	
1.1	Scope	
1.2	Related Sections	
Part 2 – Products.		
3.1	Mobilization of Equipment and Facilities to Site	
3.2	Use of Site	
3.3	Use of Existing Facilities	
3.4	Demobilization of Equipment and Facilities	
3.5	Site Cleanup	
Section 02222 – Excavati	on	
Part 1 – General		24
1.1	Scope	24
1.2	Related Sections	
1.3	Reference Documents	24
1.4	Field Measurements and Survey	24
Part 2 – Products.	·	24
Part 3 – Execution	1	24
3.1	Excavation for Surface Preparation and Leveling of	
	Areas for Steel Bulkhead and ROM Salt Placement	24
3.2	Disposing of Excavated Materials	25
3.3	Field Measurements and Survey	25
	- 	າຄ
	f-Mine Salt	
1.1	Scope	
1.1	Related Sections	
1.2	Submittals for Review and Approval	
1.3	Quality Assurance	
Part 2 – Products. 2.1	Salt Material	
ran o - Execution	l	۲۷

3.1	General	
3.2	Installation	27
3.3	Field Quality Control	
SECTION 03200 - Steel		
Part 1 – General.		
1.1	Scope	
1.2	Related Sections	
1.3	Submittals for Review and Approval	
1.4	Quality Assurance	
Part 2 – Products		
2.1	Bulkhead Material	
Part 3 – Executio		
3.1	General	
3.2	Fabrication	
3.3	Installation	
3.4	Field Quality Control	
3.5	Product Acceptance	

LIST OF TABLES

Table

Title

Table 1

Minimum Run-of-MineROM Salt Lengths

DIVISION 1 – GENERAL REQUIREMENTS

1		Section 01010 – Summary of Work
2		Part 1 – General
3	1.1	Scope
4	This s	section includes the following:
-		Scope of Work
5	•	Scope of Work
6	•	Definitions and Abbreviations
7	•	List of Drawings
8	•	Work by Others
9	•	Contractors Use of Site
10	•	Contractors Use of Facilities
11	•	Work Sequence
12	•	Work Plan
13	•	Health and Safety Plan (HASP)
14	•	Contractor Quality Control Plan (CQCP)
15	•	Submittals
10	•	
16	1.2	Scope of Work

The contractor shall furnish all labor, materials, equipment, and tools to construct Waste
Isolation Pilot Plant (WIPP) Panel Closure (WPC), including the WPC-A for Panels 1 through 9,
and the WPC-B to the north of Panel 10. Each WPC-A in each of Panels 1-9 consists of a single
steel bulkhead while the WPC-B north of Panel 10 will include dual bulkheads with run-of-mine
(ROM) salt installed between. <u>Run-of-mine salt will also be used as part of the Panel 9 closure.</u>
Nuclear Waste Partnership LLC (NWP) may elect to perform any portion or all of the work
herein. Details are as follows:

- Install WPC-A in the air-intake and the air-exhaust drifts of Panel 1, 2, and 5 with the
 explosion-isolation walls (block walls), as shown on the drawings and described in these
 specifications. The WPC-A consists of an out-bye steel bulkhead. Alternatively, install
 WPC-A in the main entries and cross-drifts in order to close multiple panels
 simultaneously based on the direction of the geotechnical engineer.
- Install WPC-A in the air-intake and the air-exhaust drifts of Panel 3, 4, 6, 7, and 8 without the explosion-isolation walls (block walls), as shown on the drawings and described in these specifications. The WPC-A consists of an out-bye steel bulkhead. Alternatively, install WPC A in <u>the main entries access mains</u> and cross-drifts in order to close multiple panels simultaneously based on the direction of the geotechnical engineer.
- Install WPC-A in the main entries between Panels 9 and 10, as shown on the drawings and described in these specifications. The WPC-A consists of an out-bye steel bulkhead.
 <u>Run-of-mine salt will also be used as part of the Panel 9 closure.</u>
- Install WPC-B in the main entries north of Panel 10, as shown on the drawings and
 described in these specifications. The WPC-B consists of an in-bye and an out-bye steel
 bulkhead with ROM salt installed between.

- 1 Unless otherwise agreed by NWP, the contractor shall use NWP supplied equipment
- 2 underground. Such use shall be coordinated with NWP and may include the use of NWP
- 3 qualified operators.
- 4 The scope of work shall include but not necessarily be limited to the following units of work:
- Develop work plan, HASP, and CQCP, and submit for approval
- Prepare and submit any other plans requiring approval
- Mobilize to site
- Coordinate construction with WIPP operations
- Perform the following operations for the air-intake drift and the air-exhaust drift that do not contain block walls (Panels 3, 4, 6, 7, and 8):
- Prepare the surfaces for the out-bye steel bulkhead placement
 Construct the out-bye steel bulkhead
- Clean up construction areas in underground and above ground
- Submit required record documents
- 15 Demobilize from site
- Perform the following operations for the air-intake drift and the air-exhaust drift with block walls (Panels 1, 2, and 5):
- Prepare the surfaces for the out-bye steel bulkhead placement
 - Construct the out-bye steel bulkhead
 - Clean up construction areas in underground and above ground
 - Submit required record documents
- 22 Demobilize from site

20

21

• Perform the following operations for the main entries between Panels 9 and 10:

24		 Prepare the surfaces for the ROM salt placement
25		 Place ROM salt material in multiple layers
26		 Prepare the surfaces for the out-bye steel bulkhead placement
27		 Construct the out-bye steel bulkhead
28		 Clean up construction areas in underground and above ground
29		 Submit required record documents
30		- Demobilize from site
31	•	Perform the following operations for the main entries north of Panel 10:
32		 Prepare the surfaces for the in-bye steel bulkhead placement
33		 Construct the in-bye steel bulkhead
34		 Prepare the surfaces for the ROM salt placement
35		 Place ROM salt material in multiple layers
36		 Prepare surfaces for the out-bye steel bulkhead placement
37		 Construct the out-bye steel bulkhead

- 1 Clean up construction areas in underground and above ground
 - Submit required record documents
- 3 Demobilize from site

4 **1.3 Definitions and Abbreviations**

5 **Definitions**

2

6 Block wall – Existing mortared concrete block wall adjacent to the panel waste disposal area as

7 shown in the drawings; also known as explosion-isolation wall

- 8 <u>Creep</u> Viscoplastic deformation of salt under deviatoric stress
- 9 <u>Partial closure</u> The process of rendering a part of the hazardous waste management unit in
- the underground repository inactive and closed according to approved facility closure plans
- <u>Run-of-mine-(ROM) salt</u> A salt backfill obtained from mining operations and emplaced in an
 uncompacted state
- <u>Volatile organic compound (VOC)</u> Any VOC with Hazardous Waste Facility Permit emission
 limits
- ¹⁵ <u>Nuclear Waste Partnership LLC (**NWP**</u>) the construction management authority

16 Abbreviations/Acronyms

17	ACI	American Concrete Institute
18	ANSI	American National Standards Institute
19	ASTM	American Society for Testing and Materials
20	CFR	Code of Federal Regulations
21	CQCP	Contractor Quality Control Plan
22	DOE	U.S. Department of Energy
23	DWG	drawing
24	EPA	U.S. Environmental Protection Agency
25	HASP	Health and Safety Plan
26	JHA	Job Hazard Analysis
27	LHD	load haul dump
28	LLC	Limited Liability Corporation
29	MSHA	U.S. Mine Safety and Health Administration
30	NWP	Nuclear Waste Partnership LLC
31	ROM	Run-of-mine
32	USACE	U.S. Army Corps of Engineers
33	VOC	volatile organic compound
34	WIPP	Waste Isolation Pilot Plant
35	WPC	WIPP Panel Closure

1.4 List of Drawings 1

The following drawings were prepared as a part of the WPC design report (Attachment G1, 2 Appendix G1-B, Drawings): 3

4	DWG 262-001	WIPP Panel Closure (WPC) Title Sheet
5	DWG 262-002	WPC Locations
6	DWG 262-003	Typical Panel Layout and Mined Entry Cross-Sections
7	DWG 262-004	WPC Details – Bulkhead and ROM Salt Locations
8	DWG 262-005	WPC Details – Bulkhead Front-View and Attachment Detail

1.5 Work by Others 9

Survey 10

All survey work to locate, control, confirm, and complete the work will be performed by NWP. All 11 survey work for record purposes will be performed by NWP. NWP may elect to perform certain 12 portions or all of the work. The work performed by the NWP will be defined prior to the contract. 13 Unless otherwise agreed by NWP, the contractor shall use underground equipment furnished by 14 NWP for construction of the steel bulkheads and placement of ROM salt. Underground mining 15 personnel who are qualified for the operation of such underground construction equipment may 16 be made available to the contractor. The use of NWP equipment shall be coordinated with 17

NWP. 18

1.6 Contractor's Use of Site 19

Site Conditions 20

The WIPP site is located near Carlsbad in southeastern New Mexico, as shown on the 21 drawings. The underground arrangements and location of the WIPP waste disposal panels are 22 shown on the drawings. The work is to construct steel bulkheads in the air-intake drifts, air-23 24 exhaust drifts, and main access drifts between Panels 9 and 10 after cessation of the disposal phase in the specific panel. The work may include installation of steel bulkheads at alternative 25 locations. Alternative locations will be specified by the NWP geotechnical engineer prior to 26 27 installation activities. Dual bulkheads will be emplaced in the main entries north of Panel 10 after cessation of all disposal activities, and ROM salt placed between these bulkheads at a 28 length to be specified by NWP. Run-of-mine salt will also be used as part of the Panel 9 closure. 29 The waste disposal panels are located approximately 2,150 feet (655 meters) below the ground 30 surface. The contractor shall visit the site, and become familiar with the site and site conditions, 31 prior to preparing a bid proposal. 32

Contractor's Use of Site 33

Areas at the ground surface will be designated for the contractor's use in assembling and 34

storing his equipment and materials. The contractor shall utilize only those areas so designated. 35

Limited space within the underground area will be designated for the contractor's use for 36

storage of material and setup of equipment. 37

1 1.7 Contractor's Use of Facilities

- 2 Existing facilities at the site available for use by the contractor are:
- Waste shaft conveyance
- Salt skip hoist
- 5 460-volt AC, 3-phase power
- Water (underground, at waste shaft only) (above ground, at a location designated by NWP)
- Additional information on mobilization and demobilization to these facilities is presented in
 Section 02010.

10 **1.8 Work Sequence**

11 Work sequence shall be as shown on the drawings and as directed by NWP. NWP will 12 designate the order in which panels are to be closed.

13 1.9 Work Plans

The contractor shall prepare work plans fully describing the proposed fabrication, installation, 14 and construction for each WIPP panel closure. The work plan shall define proposed materials. 15 equipment, and construction methods. The work plan shall state supporting processes, 16 procedures, materials safety data sheets, and regulations by reference. The work plans shall 17 address precautions related to the Job Hazards Check List. The work plan shall address 18 limitations such as hold and witness points. The work plans shall address prerequisites for work. 19 NWP shall approve the work plan and no work shall be performed prior to approval of the work 20 21 plan.

22 1.10 Health and Safety Plan (HASP)

The contractor shall obtain, review, and agree to applicable portions of the existing WIPP Safety Manual, WP 12-1. The contractor shall prepare a project-specific HASP taking into account applicable sections of the WIPP Safety Manual. Personnel performing work shall be qualified to work underground. Personnel operating heavy construction equipment shall be qualified to operate such equipment. The contractor shall also perform a Job Hazard Analysis (JHA) in accordance with WP 12-1. NWP shall approve the HASP and JHA and no work shall be performed prior to approval of the HASP and JHA.

30 **1.11 Contractor Quality Control Plan (CQCP)**

The contractor shall prepare a CQCP identifying all personnel and procedures necessary to produce an end product that complies with the contract requirements. The CQCP shall comply with applicable NWP requirements, including operator training and qualification; and Section 01400, Contractor Quality Control, of this specification. NWP shall approve the CQCP and no work shall be performed prior to approval of the CQCP.

1 1.12 Submittals

Submittals shall be in accordance with NWP submittal procedures and as required by the
 individual specifications.

4		Part 2 – Products
5	Not used.	
6		Part 3 – Execution
7	Not Used.	
8		***END OF SECTION***
9		

1			Section 01090 – Reference Standards	
2			Part 1 – General	
3	1.1	Scope		
4	This s	ection includes	he following:	
5 6	•		eference Standards at Site d in Contract Documents for Reference Standards	
7	1.2	Quality Assu	ance	
8 9 10	contra	ctor shall comp	nanship specified by association, trade, or Federal Standards, the y with requirements of the standard, except when more rigid requirements quired by applicable codes.	
11	Conform to reference by date of issue current on the date of the owner-contractor agreement.			
12 13 14	The contractor shall obtain, at the contractor's own expense, a copy of the standards referenced in the individual specification sections and shall maintain that copy at the job site until completion and acceptance of the work.			
15 16	Should specified reference standards conflict with the contract documents, the contractor shall request clarification from Nuclear Waste Partnership LLC (NWP) before proceeding.			
17	1.3	Schedule of I	leferences	
18 19 20	the wo	ork. These refer	eferenced in other sections of the specifications establish requirements for ences are identified by document number and title. The addresses of the ible for these publications are listed below.	
	A	NSI	American National Standards Institute 25 West 43rd Street New York, New York 10036 Ph: 212-642-4900	

ASTM ASTM International 100 Barr Harbor Drive P.O. Box C700 West Conshohocken, Pennsylvania 19428-2959 Ph: 610-832-9585 Fax: 610-832-9555

Fax: 212-398-0023

CFR	Code of Federal Regulations Government Printing Office 732 North Capital Street, NW Washington, District of Columbia 20401-0001 Ph: 202-512-1800 Fax: 202 512-2104
EPA	Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733 Ph: 214-665-2200
FTM-STD	Federal Test Method Standards Standardization Documents Order Desk, Building 4D 700 Robbins Avenue Philadelphia, Pennsylvania 19111-5094 Ph: 215-697-2179 Fax: 215-697-2978
NIST	National Institute of Standards and Technology 100 Bureau Drive, Stop 1000 Gaithersburg, Maryland 20899-1000 Ph: 301-975-6478 Fax: 301-975-8295
NTIS	National Technical Information Service U.S. Department of Commerce 5301 Shawnee Road Alexandria, Virginia 22312 Ph: 703-605-6000 Fax: 703-605-6900
	Part 2 – Products
Not used.	
	Part 3 – Execution
Not used.	
	END OF SECTION

1		Section 01400 – Contractor Quality Control
2		Part 1 – General
3	1.1	Scope
4	This s	section includes the following:
5 6 7 8 9 10	• • • •	Contractor Quality Control Plan (CQCP) Reference Standards Quality Assurance Tolerances Testing Services Inspection Services Submittals
12	1.2	Related Sections
13 14 15 16	• • •	01090 – Reference Standards 01600 – Material and Equipment 02222 – Excavation 03100 – Run-of-Mine Salt
17	1.3	Contractor Quality Control Plan (CQCP)
18 19 20 21 22 23	perfor Closu the co test m	ontractor shall prepare a CQCP describing the methods to be used to verify the mance of the engineered components of the Waste Isolation Pilot Plant (WIPP) Panel re (WPC). The quality control plan for the run-of-mine (ROM) salt shall detail the methods ontractor proposes to meet the minimum requirements, and the standard quality control nethods to be used to verify compliance with minimum requirements. Equipment methods by the standard quality control tests as approved in the CQCP. No work

shall be performed prior to Nuclear Waste Partnership LLC (**NWP**) approval of the CQCP.

25 **1.4 References and Standards**

Refer to individual specification sections for standards referenced therein, and to Section 01090,
 Reference Standards, for general listing. Additional standards will be identified in the CQCP.

28 Standards referenced in this section are as follows:

29 30	ASTM E 329-01b	Standard Specification for Agencies Engaged in Construction Inspection, Testing, or Special Inspection
31 32	ASTM E 543-02	Standard Practice for Agencies Performing Nondestructive Testing

1 **1.5 Quality Assurance**

- 2 The contractor shall:
- Monitor suppliers, manufacturers, products, services, site conditions, and workmanship
 to produce work of specified quality
- Comply with specified standards as minimum quality for the work except where more
 stringent tolerances, codes, or specified requirements indicate higher standards or more
 precise workmanship
- Perform work with qualified persons to produce required and specified quality

9 **1.6 Tolerances**

- 10 The contractor shall:
- Monitor excavation, fabrication, and tolerances to produce acceptable work. The contractor shall not permit tolerances to accumulate.

13 **1.7 Testing Services**

Unless otherwise agreed by NWP, the contractor shall employ an independent firm qualified to
 perform the testing services and other services specified in the individual specification sections,
 and as may otherwise be required by NWP. Testing and source quality control may occur on or
 off the project site.

The testing laboratory, if used, shall comply with applicable sections of the reference standards and shall be authorized to operate in the State of New Mexico.

Testing equipment shall be calibrated at reasonable intervals traceable either to the standards from the National Institute of Standards and Technology or to accepted values of natural

22 physical constants.

1.8 Inspection Services

The contractor may employ an independent firm to perform inspection services as a supplement to the contractor's quality control as specified in the individual specification sections, and as may be required by NWP. Inspection may occur on or off the project site.

²⁷ The inspection firm shall comply with applicable sections of the reference standards.

28 **1.9 Submittals**

²⁹ The contractor shall submit a CQCP as described herein.

³⁰ Prior to start of work, if a testing laboratory is used, the contractor shall submit for approval the

testing laboratory name, address, telephone number, and name of responsible officer of the

firm, as well as a copy of the testing laboratory compliance with the referenced American

33 Society for Testing and Materials (ASTM) standards, and a copy of the report of laboratory

facilities inspection made by Materials Reference Laboratory of National Institute of Standards
 and Technology with memorandum of remedies of any deficiencies reported by the inspection.

The contractor shall submit the names and qualifications of personnel proposed to perform the required inspections, along with their individual qualifications and certifications. Once approved by NWP, these personnel shall be available as may be required to promptly and efficiently complete the work.

Part 2 – Products

8 Not used.

9

7

Part 3 – Execution

10 **3.1 General**

The contractor is responsible for quality control and shall establish and maintain an effective 11 quality control system. The quality control system shall consist of plans, procedures, and 12 organization necessary to produce an end product that complies with the contract requirements. 13 The quality control system shall cover construction operations, both on site and off site, and 14 shall be keyed to the proposed construction sequence. The project superintendent will be held 15 responsible for the quality of work on the job. The project superintendent in this context is the 16 individual with the responsibility for the overall management of the project, including quality and 17 production. 18

19 3.2 Contractor Quality Control Plan

20 **3.2.1 General**

The contractor shall supply, not later than 30 days after receipt of notice to proceed, the CQCP, which implements the requirements of the Contract. The CQCP shall identify personnel, procedures, control, instructions, tests, records, and forms to be used. Construction shall not

²⁴ begin until the CQCP is approved by NWP.

25 **3.2.2 Content of the CQCP**

The CQCP shall cover construction operations, both on site and off site, including work by subcontractors, fabricators, suppliers, and purchasing agents and shall include, as a minimum, the following items:

- A description of the quality control organization, including a chart showing lines of authority and acknowledgment that the Contractor Quality Control (**CQC**) staff shall implement the control system for all aspects of the work specified.
- The name, qualifications (in resume format), duties, responsibilities, and authorities of each person assigned a CQC function.
- A description of CQCP responsibilities and a delegation of authority to adequately perform the functions described in the CQCP, including authority to stop work.

- Procedures for scheduling, reviewing, certifying, and managing submittals, including
 those of subcontractors, off-site fabricators, suppliers, and purchasing agents. These
 procedures shall be in accordance with NWP submittal procedures.
- Control, verification, and acceptance testing procedures as may be necessary to ensure that the work is completed to the requirements of the drawings and specifications.
- Procedures for tracking deficiencies from identification, through acceptable corrective 7 action, to verification that identified deficiencies have been corrected.
- Reporting procedures, including proposed reporting formulas.

9 3.2.3 Acceptance of Plan

Acceptance of the contractor's plan is conditional. NWP reserves the right to require the
 contractor to make changes in the CQCP and operations, including removal of personnel, if
 necessary, to obtain the quality specified.

13 **3.2.4** Notification of Changes

After acceptance of the CQCP, the contractor shall notify NWP in writing of any proposed change. Proposed changes are subject to acceptance by NWP.

16 **3.3 Tests**

17 **3.3.1 Testing Procedure**

The contractor shall perform specified or required tests to verify that control measures are adequate to complete the work to contract requirements. Upon request, the contractor shall furnish, at the contractor's own expense, duplicate samples of test specimens for testing by NWP. The contractor shall perform, as necessary, the following activities and permanently record the results:

- Verify that testing procedures comply with contract requirements.
- Verify that facilities and testing equipment are available and comply with testing standards.
- Check test instrument calibration data against certified standards.
- Verify that recording forms and test identification control number system, including the test documentation requirements, have been prepared.
- Record the results of tests taken, both passing and failing. Specification paragraph
 reference, location where tests were taken, and the sequential control number identifying
 the test will be given. If approved by NWP, actual test reports may be submitted later
 with a reference to the test number and date taken. An information copy of tests
 performed by an offsite or commercial test facility will be provided directly to NWP.

1 • The contractor may elect to develop an equipment specification with construction parameters based upon test results of a test section of ROM salt. The equipment 2 specification based upon construction parameters shall be traceable to standard test 3 results identified in the CQCP. Specification paragraph reference, location where 4 construction parameters were taken, and the sequential control number identifying the 5 construction parameters will be given. If approved by NWP, actual construction 6 parameter reports may be submitted later with a reference to the recording of 7 construction parameters, location, time, and date taken. 8

9 **3.4 Testing Laboratory**

The testing laboratory, if used, shall provide qualified personnel to perform specified sampling and testing of products in accordance with specified standards, and the requirements of contract documents.

Reports indicating results of tests, and compliance or noncompliance with the contract
 documents will be submitted in accordance with NWP submittal procedures. Testing by an
 independent firm does not relieve the contractor of the responsibility to perform the work to the
 contract requirements.

17 **3.5** Inspection Services

The inspection firm shall provide qualified personnel to perform specified inspection of products in accordance with specified standards.

- Reports indicating results of the inspection and compliance or noncompliance with the contract
 documents will be submitted in accordance with NWP submittal procedures.
- Inspection by the independent firm does not relieve the contractor of the responsibility toperform the work to the contract requirements.

24 **3.6 Completion Inspection**

25 **3.6.1 Pre-Final Inspection**

At appropriate times and at the completion of the work, the contractor shall conduct an 26 inspection of the work and develop a "punch list" of items that do not conform to the drawings 27 and specifications. The contractor shall then notify NWP that the work is ready for inspection. 28 NWP will perform this inspection to verify that the work is satisfactory and appropriately 29 complete. A "final punch list" will be developed as a result of this inspection. The contractor shall 30 ensure that the items on this list are corrected and notify NWP so that a final inspection can be 31 scheduled. Any items noted on the final inspection shall be corrected in a timely manner. These 32 inspections and any deficiency corrections required by this paragraph will be accomplished 33 within the time slated for completion of the entire work. 34

35 **3.6.2 Final Acceptance Inspection**

The final acceptance inspection will be formally scheduled by NWP based upon notice from the contractor. This notice will be given to NWP at least 14 days prior to the final acceptance inspection. The contractor shall assure that the specific items previously identified as unacceptable, along with the remaining work performed under the contract, will be complete and
 acceptable by the date scheduled for the final acceptance inspection.

3 3.7 Documentation

The contractor shall maintain current records providing factual evidence that required quality control activities and/or tests have been performed. These records shall include the work of subcontractors and suppliers and shall be on an acceptable form approved by NWP.

7 **3.8 Notification of Noncompliance**

NWP will notify the contractor of any noncompliance with the foregoing requirements. The
contractor shall take immediate corrective action after receipt of such notice. Such notice, when
delivered to the contractor at the worksite, shall be deemed sufficient for the purpose of
notification. If the contractor fails or refuses to comply promptly, NWP may issue an order
stopping all or part of the work until satisfactory corrective action has been taken. No part of the
time lost due to such stop orders shall be made the subject of claim for extension of time or for
excess costs or damages by the contractor.

16

1		Section 01600 – Material and Equipment
2		Part 1 – General
3	1.1	Scope
4	This s	ection includes the following:
5 6 7 8 9	• • •	Transportation and Handling
10	1.2	Related Sections
11 12 13 14 15	• • •	02010 – Mobilization and Demobilization

16 **1.3 Equipment**

The contractor shall specify proposed equipment in the work plan. Power equipment for use
 underground shall be either electrical or diesel-engine driven. All diesel-engine equipment shall
 be certified for use underground at the Waste Isolation Pilot Plant (WIPP) site.

20 1.4 Products

The contractor shall specify in the work plan, or in subsequently required submittals, the proposed products including, but not limited to steel bulkheads and run-of-mine (**ROM**) salt. The proposed products shall be supported by laboratory test results as required by the specifications. Products shall be subject to approval by Nuclear Waste Partnership LLC (**NWP**).

25 **1.5 Transportation and Handling**

- 26 The contractor shall:
- Transport and handle products in accordance with manufacturer's instructions.
- Promptly inspect shipments to ensure that products comply with requirements, quantities
 are correct, and products are undamaged.
- Provide equipment and personnel to handle products by methods to prevent soiling,
 disfigurement, or damage.

1 **1.6 Storage and Protection**

- 2 The contractor shall:
- Store and protect products in accordance with manufacturers' instructions.
- Store with seals and labels intact and legible.
- Store sensitive products in weather-tight, climate-controlled enclosures in an
 environment favorable to product.
- Provide ventilation to prevent condensation and degradation of products.
- Store loose granular materials (other than ROM salt) on solid flat surfaces in a well drained area and prevent mixing with foreign matter.
- Provide equipment and personnel to store products by methods to prevent soiling,
 disfigurement, or damage.
- Arrange storage of products to permit access for inspection and periodically inspect to verify products are undamaged and are maintained in acceptable condition.

14 **1.7 Substitutions**

15 **1.7.1 Equipment Substitutions**

The contractor may substitute equipment for that proposed in the work plan subject to NWP approval.

18 **1.7.2 Product Substitutions**

The contractor may not substitute products after the proposed products have been approved by NWP unless he can demonstrate that the supplier/source of that product no longer exists in which case he shall submit alternate products with lab test results to NWP for approval.

22		Part 2 – Products
23	Not used.	
24		Part 3 – Execution
25	Not used.	
26		***END OF SECTION***
27		

DIVISION 2 – SITE WORK

1		Section 02010 – Mobilization and Demobilization
2		Part 1 – General
3	1.1	Scope
4	This s	ection includes the following:
5 6 7 8 9	• • •	Mobilization of Equipment and Facilities to Site Use of Site Use of Existing Facilities Demobilization of Equipment and Facilities Site Cleanup
10	1.2	Related Sections
11 12	•	01010 – Summary of Work 01600 – Material and Equipment
13		Part 2 – Products
14	Not us	sed.
15		Part 3 – Execution
16	3.1	Mobilization of Equipment and Facilities to Site
17 18 19	faciliti	authorization to proceed, the contractor shall mobilize the contractor's equipment and es to the jobsite. Equipment and facilities shall be as specified and as defined in the actor's work plan.
20 21		ar Waste Partnership LLC (NWP) will provide utilities at designated locations. The actor shall be responsible for hookups and tie-ins required for contractor operations.
22 23	The c faciliti	ontractor shall be responsible for providing <u>its</u> his own office, storage, and sanitary es.
24 25		will be designated for the contractor's use in the underground area near the Waste on Pilot Plant (WIPP) Panel Closure (WPC) installation. These areas are limited.
26	3.2	Use of Site
27 28 29	contra	ontractor shall use only those areas specifically designated for use by NWP. The actor shall limit on-site travel to the specific routes required for performance of work, and nated by NWP.

1 3.3 Use of Existing Facilities

- 2 Existing facilities available for use by the contractor are as follows:
- Waste shaft conveyance
- Salt skip hoist

6

7

- 5 460-volt AC, 3-phase power
 - Water underground at waste shaft only
 - Water on surface at location designated by NWP

8 The contractor shall arrange for use of the facilities with NWP and coordinate contractor actions 9 and requirements with ongoing NWP operations.

¹⁰ Use of water in the underground will be restricted. No washout or cleanup will be permitted in

the underground except as designated by NWP. Aboveground washout or cleanup of equipment will be allowed in the areas designated by NWP.

The contractor is cautioned to be aware of the physical dimensions of the waste conveyanceand the air lock.

15 The contractor shall be responsible for any damage incurred by the existing site facilities as a

result of contractor operations. Any damage shall be reported immediately to NWP and repaired
 at the contractor's cost.

3.4 Demobilization of Equipment and Facilities

At completion of work, the contractor shall demobilize contractor equipment and facilities from the job site. Contractor's equipment and materials shall be removed and disturbed areas restored. Utilities shall be removed to their connection points unless otherwise directed by NWP. Any equipment that becomes radiologically contaminated will be managed in accordance with

23 NWP radiological protection policies.

24 3.5 Site Cleanup

At conclusion of the work, the contractor shall remove trash, waste, debris, excess construction materials, and restore the affected areas to their prior condition, to the satisfaction of NWP. A final inspection will be conducted by NWP and the contractor before final payment is approved. Any trash, waste, debris, excess construction materials that become radiologically contaminated will be managed in accordance with NWP radiological protection policies.

31

1		Section 02222 – Excavation
2		Part 1 – General
3	1.1	Scope
4	This s	section includes the following:
5 6	•	Excavation for Surface Preparation and Leveling of Areas for Steel Bulkhead and ROM Salt Placement
7	•	Disposing of Excavated Materials
8	•	Field Measurements and Survey
9	1.2	Related Sections
10 11	•	01010 – Summary of Work 01600 – Material and Equipment
12	1.3	Reference Documents
13 14	•	, R.D., 1984. Reference Stratigraphy and Rock Properties for the Waste Isolation Pilot SAND83-1908, Sandia National Laboratories, Albuquerque, New Mexico.
15	1.4	Field Measurements and Survey
16 17	Surve (NWF	ey required for performance of the work will be provided by Nuclear Waste Partnership LLC
18		Part 2 – Products
19	Not u	sed.
20		Part 3 – Execution
21 22	3.1	Excavation for Surface Preparation and Leveling of Areas for Steel Bulkhead and ROM Salt Placement
23 24 25 26	Plant and re	ontractor shall inspect the areas designated for placement of the Waste Isolation Pilot (WIPP) Panel Closure (WPC) components (run-of-mine (ROM) salt and steel bulkheads) emove any loose material. If loose material is found, the contractor shall excavate and the surface by removing loose material and cleaning rock surfaces. The surface

prepare the surface by removing loose material and cleaning lock surfaces. The surface
 preparation of the floor shall produce a surface suitable for anchoring the steel bulkhead base
 components and for placing the first layer of ROM salt (as applicable). Excavation may be

performed by either mechanical or manual means. Use of explosives is prohibited.

1 3.2 Disposing of Excavated Materials

The contractor shall dispose of excavated materials as directed by NWP. No excavated
 materials from radiologically controlled areas will be disposed of without prior approval of NWP.

4 3.3 Field Measurements and Survey

5 Survey required for performance of the work will be provided by NWP. The contractor shall

6 protect survey control points, benchmarks, etc., from damage-by his operations. NWP will verify 7 that the contractor has excavated to the required lines and grades. No salt shall be emplaced

- 8 until approved by NWP.
- ***END OF SECTION***

1		SECTION 03100 – Run-of-Mine Salt			
2		Part 1 – General			
3	1.1	Scope			
4	This s	ection includes the following:			
5	•	Salt Placement			
6	1.2	Related Sections			
7 8 9	• •	01010 – Summary of Work 01400 – Contractor Quality Control 01600 – Material and Equipment			
10	1.3	Submittals for Review and Approval			
11 12	The salt emplacement method, dust control plan and other safety-related material shall be approved by Nuclear Waste Partnership LLC (NWP).				
13	1.4	Quality Assurance			
14 15	The co (CQC	ontractor shall perform the work in accordance with the Contractor Quality Control Plan ${f P}$).			
16		Part 2 – Products			
17	2.1	Salt Material			
18 19		alt is run-of-mine (ROM) salt and requires no grading or compaction. The salt shall be free eign organic material.			
20		Part 3 – Execution			
21	3.1	General			
22	The co	ontractor shall furnish labor, material, equipment, and tools to handle and place the salt.			
23 24 25	in Par	ontractor shall use underground equipment and underground mine personnel as required t 1.5, Work by Others in Section 01010, Summary of Work. NWP will supply ROM salt. ontractor shall make suitable arrangements for transporting and placing the ROM salt.			
26	3.2	Installation			

27 Run-of-mine salt shall be transported to the Waste Isolation Pilot Plant (**WIPP**) Panel Closure

(WPC)-<u>A installation area north of Panel 9 prior to installation of the outbye bulkhead and to the</u>
 <u>WPC-</u>B installation area north of Panel 10 after the construction of the in-bye steel bulkhead.

- <u>WPC-B</u> installation area north of Panel 10 after the construction of the in-bye steel bulkhead
 <u>Run-of-mine salt from any underground excavation is useable as long as it is free of foreign</u>
- 31 organic matter. The ROM salt is not required to achieve a specified density.

- 1 Salt may be emplaced in layers to facilitate the construction. The ROM salt is emplaced in
- 2 layers to achieve minimum lengths shown in Table 1. The lengths reported in Table 1 do not
- include sloped ends of the ROM salt plug. Extents of the ROM salt emplacement are designated
- 4 in the drawings.
- 5 There shall be no gap left between ROM salt and roof or sidewalls. Hand placement or push
- 6 plates can be used to fill the voids if necessary. The approximate lengths and slope inclines are
- 7 specified in the drawings. Emplacement of the ROM salt at natural angle of repose is
- 8 acceptable.
- 9

Minimum ROM Salt Length ¹ (feet)
35
40
50
65

Note:

1. Reported ROM length dimensions do not include end slopes of the ROM salt plug.

10 3.3 Field Quality Control

11 The contractor shall provide a Quality Control Inspector to inspect the emplacement of salt.

END OF SECTION

- 12
- 13

1		SECTION 03200 – Steel Bulkheads
2		Part 1 – General
3	1.1	Scope
4	This s	ection includes the following:
5	•	Steel Bulkhead Installation
6	1.2	Related Sections
7 8 9	• •	01010 – Summary of Work 01400 – Contractor Quality Control 01600 – Material and Equipment
10	1.3	Submittals for Review and Approval
11 12		ethod of installation, construction equipment, and construction materials shall be /ed by Nuclear Waste Partnership LLC (NWP).
13	1.4	Quality Assurance
14 15	The co (CQC I	ontractor shall perform the work in accordance with the Contractor Quality Control Plan).
16		Part 2 – Products
17	2.1	Bulkhead Material
18 19		ruction material, including steel profiles, sheet metal, flexible flashing, and ctors/bolts shall be approved by NWP prior to construction.
20		Part 3 – Execution
21	3.1	General
22 23 24 25	the loc under	ontractor shall furnish all labor, material, equipment, and tools to install steel bulkheads at cations specified in the drawings. The contractor shall use underground equipment and ground mine personnel as required in Part 1.5, Work by Others, in Section 01010, ary of Work.
26	3.2	Fabrication
27	Bulkhe	eads will be fabricated on the surface or in the underground in a location designated by

Bulkheads will be fabricated on the surface or in the underground in a location designated by NWP. 28

1 3.3 Installation

In-bye steel and out-bye steel bulkheads shall be installed in the designated WPC areas
 approved by the NWP as specified in the drawings. The contractor shall not commence
 installation activities without prior inspection of the ground conditions as documented in the
 Health and Safety Plan (HASP) per Section 01010 of these specifications and without prior
 approval by NWP.

7 3.4 Field Quality Control

8 The contractor shall provide a Quality Control Inspector to inspect the steel bulkhead installation 9 if requested by NWP prior to contract.

10 **3.5 Product Acceptance**

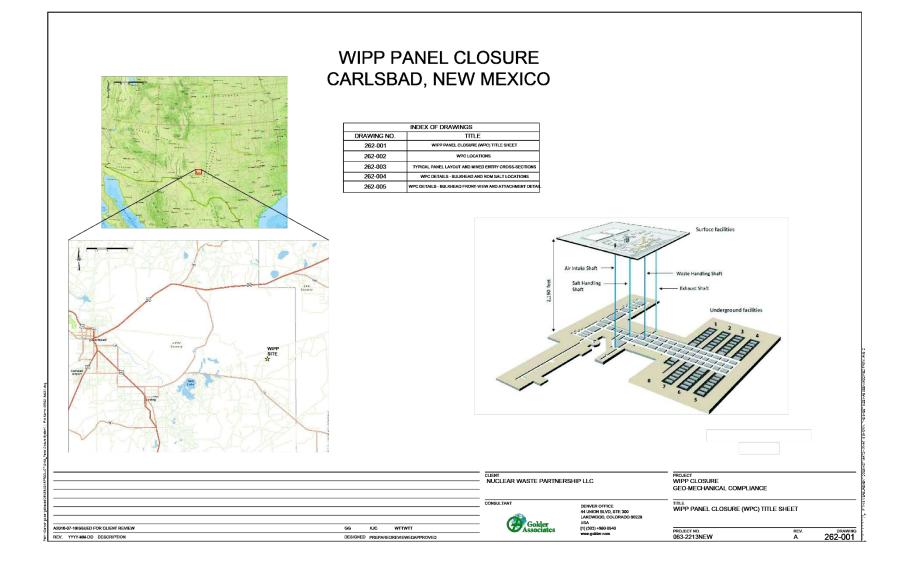
The contractor shall arrange for the pre-final inspection and final product inspection as
 described in Part 3.6, Section 01400, of these specifications. The resolution of noncompliance
 issues will be conducted as described in Part 3.8, Section 01400, of these specifications.

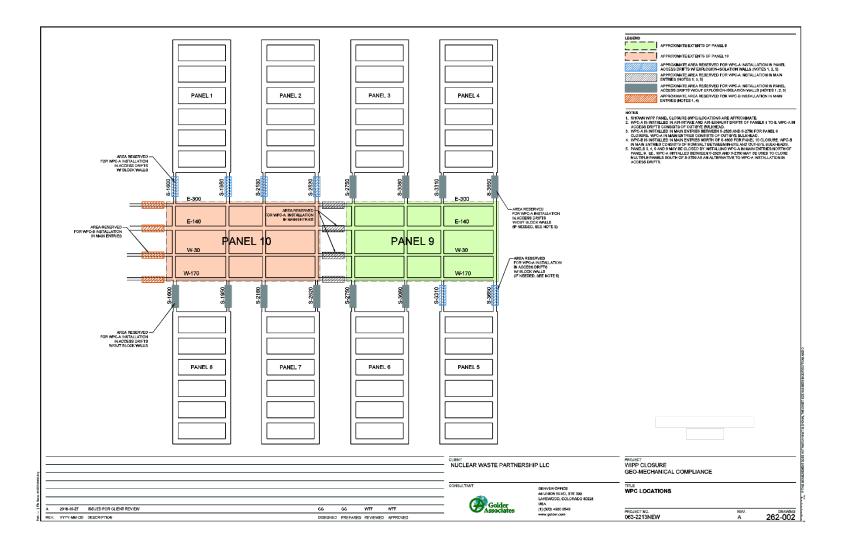
15

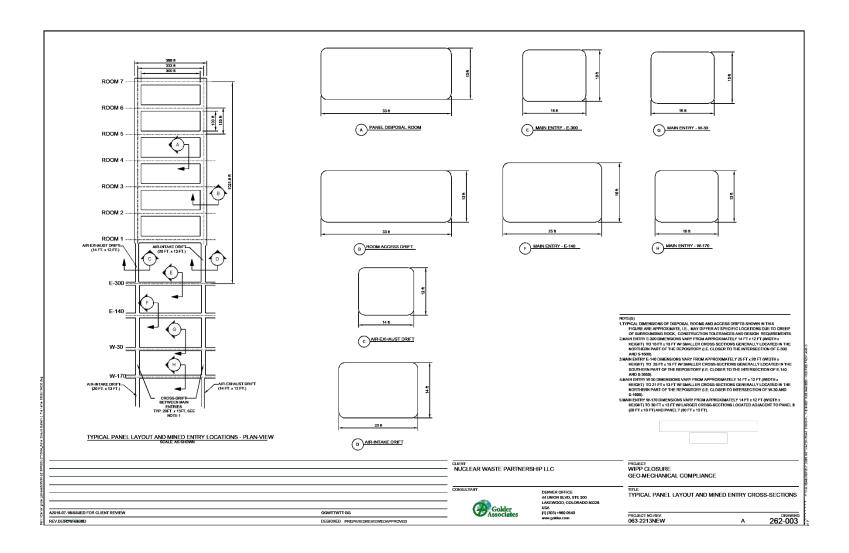
ATTACHMENT G1 APPENDIX G1-B

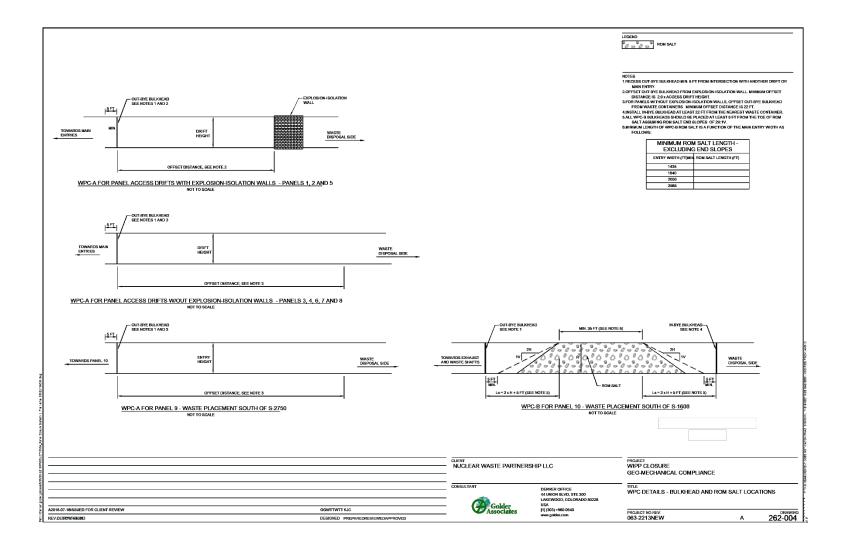
DRAWINGS

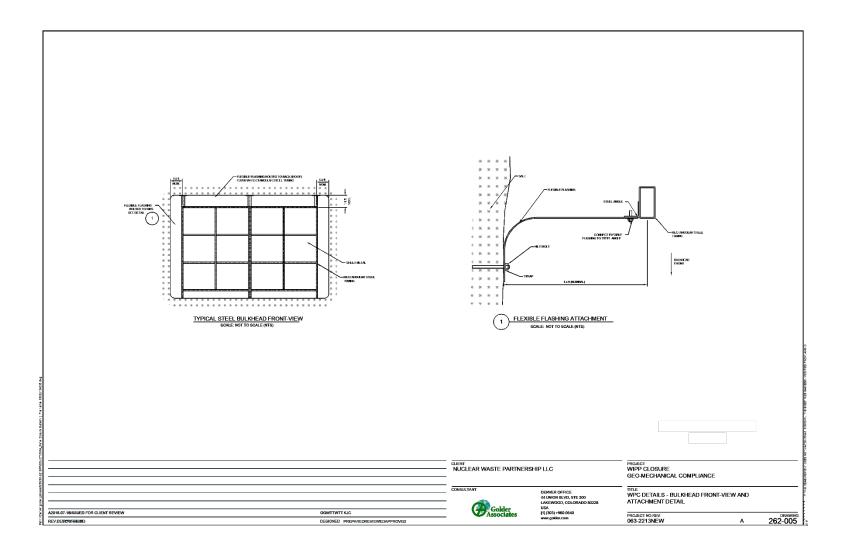
WIPP PANEL CLOSURE WASTE ISOLATION PILOT PLANT CARLSBAD, NEW MEXICO











ATTACHMENT G2

WASTE ISOLATION PILOT PLANT SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

ATTACHMENT G2

WASTE ISOLATION PILOT PLANT SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

ADAPTED FROM:

SAND96-1326/1 DISTRIBUTION UNLIMITED RELEASE CATEGORY UC-721 PRINTED AUGUST 1996

WASTE ISOLATION PILOT PLANT SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

VOLUME 1 OF 2: MAIN REPORT APPENDICES A AND B

REPOSITORY ISOLATION SYSTEMS DEPARTMENT SANDIA NATIONAL LABORATORIES ALBUQUERQUE, NM 87185

Abstract

This report describes a shaft sealing system design for the Waste Isolation Pilot Plant (WIPP), a proposed nuclear waste repository in bedded salt. The system is designed to limit entry of water and release of contaminants through the four existing shafts after the WIPP is decommissioned. The design approach applies redundancy to functional elements and specifies multiple, common, low-permeability materials to reduce uncertainty in performance. The system comprises 13 elements that completely fill the shafts with engineered materials possessing high density and low permeability. Laboratory and field measurements of component properties and performance provide the basis for the design and related evaluations. Hydrologic, mechanical, thermal, and physical features of the system are evaluated in a series of calculations. These evaluations indicate that the design guidance is addressed by effectively limiting transport of fluids within the shafts, thereby limiting transport of hazardous material to regulatory boundaries. Additionally, the use or adaptation of existing technologies for placement of the seal components combined with the use of available, common materials assure that the design can be constructed.

This report was modified to make it a part of the RCRA Facility Permit issued by the New Mexico Environment Department (NMED). The modifications included removal of Appendices C and D from the original document. Although they were important to demonstrate compliance with the performance standards in the hazardous waste regulations, they do not provide plans or procedures that will be implemented under the authority of the Permit. Appendices A, B and E are retained as Attachments to the Permit (Attachments G2-A, G2-B and G2-E). The Figures

in this report, which were interspersed in the text in the original document, have been moved to a common section following the References.

Acknowledgments

The work presented in this document represents the combined effort of a number of individuals at Sandia National Laboratories, Parsons Brinckerhoff (under contract AG-4909), INTERA (under contract AG-4910), RE/SPEC (under contract AG-4911), and Tech Reps. The Sandian responsible for the preparation of each section of the report and the lead individual(s) at firms under contract to Sandia that provided technical expertise are recognized below.

Section	Author(s)
Executive Summary	F. D. Hansen, Sandia
Section 1, Introduction	J. R. Tillerson, Sandia
Section 2, Site Geologic, Hydrologic, & Geochemical Setting	A. W. Dennis and S. J. Lambert, Sandia
Section 3, Design Guidance	A. W. Dennis, Sandia
Section 4, Design Description	A. W. Dennis, Sandia
Section 5, Material Specifications	F. D. Hansen, Sandia
Section 6, Construction Techniques	E. H. Ahrens, Sandia
Section 7, Structural Analyses of Shaft Seals	L. D. Hurtado, Sandia; M. C. Loken and L.L. Van Sambeek, RE/SPEC
Section 8, Hydrologic Evaluation of the Shaft Seal System	M. K. Knowles, Sandia; V.A. Kelley, INTERA
Section 9, Conclusions	J. R. Tillerson and A. W. Dennis, Sandia
Appendix A, Material Specifications	F. D. Hansen, Sandia
Appendix B, Shaft Sealing Construction Procedures	E. H. Ahrens, Sandia, with the assistance of Parsons Brinckerhoff Construction and Scheduling staff
Appendix C, Fluid Flow Analyses	M. K. Knowles, Sandia; V.A. Kelley, INTERA
Appendix D, Structural Analyses	L. D. Hurtado, Sandia; M. C. Loken and L. L. Van Sambeek, RE/SPEC

Appendix E, Design Drawings

A. W. Dennis, Sandia; C. D. Mann, Parsons Brinckerhoff, with the assistance of the Parsons Brinckerhoff Design staff

Design reviews provided by Malcolm Gray, Atomic Energy Canada Ltd., Whiteshell Laboratory; Stephen Phillips, Phillips Mining, Geotechnical & Grouting, Inc.; and John Tinucci, Itasca Consulting Group. Inc. are appreciated, as are document reviews provided by Don Galbraith, U.S. Department of Energy Carlsbad Area Office; William Thompson, Carlsbad Area Office Technical Assistance Contractor; Robert Stinebaugh, Palmer Vaughn, Deborah Coffey, and Wendell Weart, Sandia.

T. P. Peterson and S. B. Kmetz, Tech Reps, served as technical editors of this document.

TABLE OF CONTENTS

Execut	Introdu Site Se Design Design Structu Hydrole	ettion etting Guidance Descriptio Iral Analysi ogic Evalua	ns s		9 9 .10 .11 .13
1.	Introdu 1.1 1.2 1.3 1.4 1.5 1.6	Iction Purpose of Compliance Submittal Design Report WIPP Description Performance Objective for WIPP Shaft Seal System Sealing System Design Development Process Organization of Document Systems of Measurement			
2.	Site Ge 2.1 2.2 2.3 2.4	 eologic, Hydrologic, and Geochemical Setting			.19 .19 .20 .20 .21 .21 .25 .26
3.	Design 3.1 3.2	2.4.2 Regional and Local Geochemistry in the Salado Formation Guidance Introduction Design Guidance and Design Approach			.31 .31
4.	Design 4.1 4.2 4.3	Introductio Existing SI	n hafts /stem Design [Description Compacted Salt Column Upper and Lower Salado Compacted Clay Columns Upper, Middle, and Lower Concrete-Asphalt Waterstops Asphalt Column Shaft Station Monolith	.33 .37 .38 .38 .39 .40 .40
			4.3.2.1	Rustler Compacted Clay Column	

		4.3.3	4.3.2.2 Near-Surface	Rustler Concrete Plug	42
			4.3.3.1	Near-Surface Upper Compacted Earthen Fill	
			4.3.3.2	Near-Surface Concrete Plug	
			4.3.3.3	Near-Surface Lower Compacted Earthen Fill	43
5.	Materi	ial Specifica	ation		44
	5.1				
	5.2	Materials.			46
		5.2.1	Mass Concre	te	46
		5.2.2	Compacted C	Clay	47
		5.2.3			
		5.2.4		Salt Column	
		5.2.5		Grout	
		5.2.6			
	5.3	Concludin	g Remarks		50
6.	Const	ruction Tech	hniques		51
	6.1		U U		
	6.2			Shaft Station Monolith and Shaft Plugs)	
	6.3			ns (Salado and Rustler Formations)	
	6.4			Asphaltic Mix Columns	
	6.5				
	6.6			and Removal of Liners	
	6.7				
	6.8				
7.		•		als	
	7.1				
	7.2				
	7.3			eatures	
		7.3.1		Models	
		7.3.2 7.3.3		ithologies ck Zone Models	
	7.4			haft Seal Components	
	7.4	7.4.1	•	Concrete Seals	
		7.4.1		Thermal Analysis of Concrete Seals	
			7.4.1.2	Structural Analysis of Concrete Seals	
			7.4.1.3	Thermal Stress Analysis of Concrete Seals	
				•	
			7.4.1.4	Effect of Dynamic Compaction on Concrete	
			7.4.1.4	Effect of Dynamic Compaction on Concrete Seals	58
			7.4.1.4 7.4.1.5	· ·	58
			7.4.1.5	Seals Effect of Clay Swelling Pressures on Concrete Seals	58
		7.4.2	7.4.1.5 Crushed Salt	Seals Effect of Clay Swelling Pressures on Concrete Seals Seals	58 58
		7.4.2	7.4.1.5 Crushed Salt 7.4.2.1	Seals Effect of Clay Swelling Pressures on Concrete Seals Seals Structural Analysis of Compacted Salt Seal	58 58
		7.4.2	7.4.1.5 Crushed Salt	Seals Effect of Clay Swelling Pressures on Concrete Seals Seals Structural Analysis of Compacted Salt Seal Pore Pressure Effects on Reconsolidation of	58 58 58
			7.4.1.5 Crushed Salt 7.4.2.1 7.4.2.2	Seals. Effect of Clay Swelling Pressures on Concrete Seals. Seals. Structural Analysis of Compacted Salt Seal Pore Pressure Effects on Reconsolidation of Crushed Salt Seals.	58 58 58 58
		7.4.3	7.4.1.5 Crushed Salt 7.4.2.1 7.4.2.2 Compacted C	Seals Effect of Clay Swelling Pressures on Concrete Seals Structural Analysis of Compacted Salt Seal Pore Pressure Effects on Reconsolidation of Crushed Salt Seals Clay Seals	58 58 58 58 58
			7.4.1.5 Crushed Salt 7.4.2.1 7.4.2.2 Compacted C Asphalt Seals	Seals Effect of Clay Swelling Pressures on Concrete Seals Structural Analysis of Compacted Salt Seal Pore Pressure Effects on Reconsolidation of Crushed Salt Seals Clay Seals	58 58 58 58 59 59
		7.4.3	7.4.1.5 Crushed Salt 7.4.2.1 7.4.2.2 Compacted C	Seals Effect of Clay Swelling Pressures on Concrete Seals Structural Analysis of Compacted Salt Seal Pore Pressure Effects on Reconsolidation of Crushed Salt Seals Clay Seals	58 58 58 58 59 59 59

			7.4.4.3	Shrinkage Analysis	60		
	7.5	Disturbed Rock Zone Considerations					
		7.5.1 General Discussion of DRZ					
		7.5.2	Structural	Analyses	60		
			7.5.2.1	Salado Salt	60		
			7.5.2.2	Salado Anhydrite Beds	61		
			7.5.2.3	Near-Surface and Rustler Formations	61		
	7.6	Other A					
		7.6.1	Asphalt W	aterstops	61		
		7.6.2	Shaft Pilla	r Backfilling	62		
8.	Hydro	logic Eva	aluation of the	Shaft Seal System	63		
0.	8.1						
	8.2						
	8.3	Performance Models Downward Migration of Rustler Groundwater					
	0.0	8.3.1					
		8.3.2		lethodof Results			
	8.4	Gas Migration and Consolidation of Compacted Salt Column					
		8.4.1	•	lethod			
		8.4.2		of Results			
	8.5	Upward		Brine			
	8.6	•	Ŷ				
9.	Concl	usions			69		
10.	Refere	ences			71		
Anner	ndix G2-	.Δ	Material Spec	ifications			
	ndix G2-			Construction Procedures			
	ndix C*		Fluid Flow Ana				
	ndix D*		Structural Ana	•			
	ndix D	.F	Design Drawir				
, hhei		L .	Design Diawi	192			

* Appendices C and D are not included in the facility Permit.

***FIGURES**

2 Figure

1

18

Title

- 3 Figure G2-1 View of the WIPP Underground Facility
- 4 Figure G2-2 Location of the WIPP in the Delaware Basin
- 5 Figure G2-3 Chart Showing Major Stratigraphic Divisions, Southeastern New Mexico
- 6 Figure G2-4 Generalized Stratigraphy of the WIPP Site Showing Repository Level
- 7 Figure G2-5 Arrangement of the Air Intake Shaft Sealing System
- 8 Figure G2-6 Multi-deck Stage Illustrating Dynamic Compaction
- 9 Figure G2-7 Multi-deck Stage Illustrating Excavation for Asphalt Waterstop
- 10 Figure G2-8 Drop Pattern for 6-m-Diameter Shaft Using a 1.2-m-Diameter Tamper
- 11Figure G2-9Plan and Section Views of Downward Spin Pattern of Grout Holes
- 12Figure G2-10Plan and Section Views of Upward Spin Pattern of Grout Holes
- Figure G2-11 Example of Calculation of an Effective Salt Column Permeability from the Depth-Dependent Permeability at a Point in Time
- Figure G2-12 Effective Permeability of the Compacted Salt Column using the 95%
 Certainty Line
- 17 *NOTE: All Figures are attached following References

TABLES

Table Title 19 Table G2-1 Salado Brine Seepage Intervals⁽¹⁾ 20 Table G2-2 Permeability and Thickness of Hydrostratigraphic Units in Contact with Seals 21 Freshwater Head Estimates in the Vicinity of the Air Intake Shaft 22 Table G2-3 Table G2-4 Chemical Formulas, Distributions, and Relative Abundance of Minerals in the 23 Rustler and Salado Formations (after Lambert, 1992) 24 Major Solutes in Selected Representative Groundwater from the Rustler 25 Table G2-5 Formation and Dewey Lake Redbeds, in mg/L (after Lambert, 1992) 26 Variations in Major Solutes in Brines from the Salado Formation, in mg/L Table G2-6 27 (after Lambert, 1992) 28 Table G2-7 Shaft Sealing System Design Guidance 29 Drawings Showing Configuration of Existing WIPP Shafts (Drawings are in Table G2-8 30 Appendix G2-E) 31 Summary of Information Describing Existing WIPP Shafts Table G2-9 32 Drawings Showing the Sealing System for Each Shaft (Drawings are in Table G2-10 33 Appendix G2-E) 34 Table G2-11 Drawings Showing the Shaft Station Monoliths (Drawings are in Appendix 35 G2-E) 36 Table G2-12 Summary of Results from Performance Model 37 38 39

1		ACRONYMS
2 3	AIS AMM	Air Intake Shaft asphalt mastic mix
4	CFR	Code of Federal Regulations
5 6	DOE DRZ	Department of Energy disturbed rock zone
7	EPA	Environmental Protection Agency
8	HMAC	hot mix asphalt concrete
9 10	MDCF MD	Multimechanism Deformation Coupled Fracture Munson-Dawson
11 12	NMED NMVP	New Mexico Environment Department No Migration Variance Petition
13 14	PA PTM	performance assessment Plug Test Matrix
15	QA	quality assurance
16 17 18 19	SMC SPVD SSSPT SWCF	Salado Mass Concrete Site Preliminary Design Validation Small Scale Seal Performance Test Sandia WIPP Central Files
20	TRU	transuranic
21	WIPP	Waste Isolation Pilot Plant

1 Executive Summary

2 Introduction

This report documents a shaft seal system design developed as part of a submittal to the 3 Environmental Protection Agency (EPA) and the New Mexico Environment Department (NMED) 4 that will demonstrate regulatory compliance of the Waste Isolation Pilot Plant (WIPP) for 5 disposal of transuranic waste. The shaft seal system limits entry of water into the repository and 6 restricts the release of contaminants. Shaft seals address fluid transport paths through the 7 opening itself, along the interface between the seal material and the host rock, and within the 8 disturbed rock surrounding the opening. The entire shaft seal system is described in this Permit 9 Attachment and its three appendices, which include seal material specifications, construction 10 methods, rock mechanics analyses, fluid flow evaluations, and the design drawings. The design 11 represents a culmination of several years of effort that has most recently focused on providing 12 to the EPA and NMED a viable shaft seal system design. Sections of this report and the 13 appendices explore function and performance of the WIPP shaft seal system and provide well 14 documented assurance that such a shaft seal system could be constructed using available 15 materials and methods. The purpose of the shaft seal system is to limit fluid flow within four 16 existing shafts after the repository is decommissioned. Such a seal system would not be 17 implemented for several decades, but to establish that regulatory compliance can be achieved 18 at that future date, a shaft seal system has been designed that exhibits excellent durability and 19 performance and is constructable using existing technology. The design approach is 20 conservative, applying redundancy to functional elements and specifying various common, low-21 permeability materials to reduce uncertainty in performance. It is recognized that changes in the 22 design described here will occur before construction and that this design is not the only possible 23 combination of materials and construction strategies that would adequately limit fluid flow within 24 25 the shafts.

26 Site Setting

One of the U.S. Department of Energy's (**DOE's**) site selection criteria is a favorable geologic 27 setting which minimizes fluid flow as a transport mechanism. Groundwater hydrology in the 28 proximity of the WIPP site is characterized by geologic strata with low transmissivity and low 29 hydrologic gradients, both very positive features with regard to sealing shafts. For purposes of 30 performance evaluations, hydrological analyses divide lithologies and requirements into the 31 Rustler Formation (and overlying strata) and the Salado Formation, comprised mostly of salt. 32 The principal design concern is fluid transport phenomena of seal materials and lithologies 33 within the Salado Formation. The rock mechanics setting is an important consideration in terms 34 of system performance. Rock properties affect hydrologic response of the shaft seal system. 35 The stratigraphic section contains lithologies that exhibit brittle and ductile behavior. A zone of 36 rock around the shafts is disturbed owing to the creation of the opening. The disturbed rock 37 zone (**DRZ**) is an important design consideration because it possesses higher permeability than 38 intact rock. Host rock response and its potential to fracture, flow, and heal around WIPP shaft 39 openings are relevant to the performance of the shaft seal system. 40

41 **Design Guidance**

- Use of both engineered and natural barriers to isolate wastes from the accessible environment
- is required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR
- 44 §191.14(d). The use of engineered barriers to prevent or substantially delay movement of water,

1 hazardous constituents, or radionuclides toward the accessible environment is required by

- 2 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR §194.44.
- 3 Hazardous constituent release performance standards are specified in Permit Part 5 and
- 4 20.4.1.500 NMAC (incorporating 40 CFR §§264.111(b), 264.601(a), and 264 Subpart F).
- 5 Radionuclide release limits are specified in 40 CFR §191 for the entire repository system (EPA,
- 6 1996a; 1996b). Design guidance for the shaft seal system addresses the need for the WIPP to
- 7 comply with system requirements and to follow accepted engineering practices using
- 8 demonstrated technology. Design guidance is categorized below:
- limit hazardous constituents reaching regulatory boundaries,
- restrict groundwater flow through the sealing system,
- use materials possessing mechanical and chemical compatibility,
- protect against structural failure of system components,
- limit subsidence and prevent accidental entry, and
- utilize available construction methods and materials.

Discussions of the design presented in the text of this report and the details presented in the 15 appendices respond to these qualitative design guidelines. The shaft seal system design was 16 completed under a Quality Assurance program that includes review by independent, gualified 17 experts to assure the best possible information is provided to the DOE on selection of 18 engineered barriers (40 CFR §194.27). Technical reviewers examined the complete design 19 including conceptual, mathematical, and numerical models and computer codes (40 CFR 20 §194.26). The design reduces the impact of uncertainty associated with any particular element 21 by using multiple sealing system components and by using components constructed from 22 different materials. 23

24 **Design Description**

The shaft sealing system comprises 13 elements that completely fill the shaft with engineered materials possessing high density and low permeability. Salado Formation components provide the primary regulatory barrier by limiting fluid transport along the shaft during and beyond the 10,000-year regulatory period. Components within the Rustler Formation limit commingling between brine-bearing members, as required by state regulations. Components from the Rustler to the surface fill the shaft with common materials of high density, consistent with good engineering practice. A synopsis of each component is given below.

Shaft Station Monolith. At the bottom of each shaft a salt-saturated concrete monolith supports the local roof. A salt-saturated concrete, called Salado Mass Concrete (SMC), is specified and is placed using a conventional slickline construction procedure where the concrete is batched at the surface. SMC has been tailored to match site conditions. The salt-handling shaft and the waste-handling shaft have sumps which also will be filled with salt-saturated concrete as part of the monolith.

- Clay Columns. A sodium bentonite is used for three compacted clay components in the Salado
 and Rustler Formations. Although alternative construction specifications are viable, labor intensive placement of compressed blocks is specified because of proven performance. Clay
- columns effectively limit brine movement from the time they are placed to beyond the
- 10,000-year regulatory period. Stiffness of the clay is sufficient to promote healing of fractures in
- the surrounding rock salt near the bottom of the shafts, thus removing the proximal DRZ as a

potential pathway. The Rustler clay column limits brine communication between the Magenta
 and Culebra Members of the Rustler Formation.

Concrete-Asphalt Waterstop Components. Concrete-asphalt waterstop components 3 comprise three elements: an upper concrete plug, a central asphalt waterstop, and a lower 4 concrete plug. Three such components are located within the Salado Formation. These 5 concrete-asphalt waterstop components provide independent shaft cross-section and DRZ 6 seals that limit fluid transport, either downward or upward. Concrete fills irregularities in the shaft 7 wall, while use of the salt-saturated concrete assures good bonding with salt. Salt creep against 8 the rigid concrete components establishes a compressive stress state and promotes early 9 healing of the salt DRZ surrounding the concrete plugs. The asphalt intersects the shaft cross 10 section and the DRZ. 11

Compacted Salt Column. Each shaft seal includes a column of compacted WIPP salt with 1.5 12 percent weight water added to the natural material. Construction demonstrations have shown 13 that mine-run WIPP salt can be dynamically compacted to a density equivalent to approximately 14 90% of the average density of intact Salado salt. The remaining void space is removed through 15 consolidation caused by creep closure. The salt column becomes less permeable as density 16 increases. The location of the compacted salt column near the bottom of the shaft assures the 17 fastest achievable consolidation of the compacted salt column after closure of the repository. 18 Analyses indicate that the salt column becomes an effective long-term barrier in under 100 19 years. 20

Asphalt Column. An asphalt-aggregate mixture is specified for the asphalt column, which
 bridges the Rustler/Salado contact and provides a seal essentially impermeable to brine for the
 shaft cross-section and the shaft wall interface. All asphalt is placed with a heated slickline.

Concrete Plugs. A concrete plug is located just above the asphalt column and keyed into the surrounding rock. Mass concrete is separated from the cooling asphalt column with a layer of fibercrete, which permits work to begin on the overlying clay column before the asphalt has completely cooled. Another concrete plug is located near the surface, extending downward from the top of the Dewey Lake Redbeds.

Earthen Fill. The upper shaft is filled with locally available earthen fill. Most of the fill is
 dynamically compacted (the same method used to construct the salt column) to a density
 approximating the surrounding lithologies. The uppermost earthen fill is compacted with a
 sheepsfoot roller or vibratory plate compactor.

33 Structural Analysis

Structural issues pertaining to the shaft seal system have been evaluated. Mechanical, thermal, 34 physical, and hydrological features of the system are included in a broad suite of structural 35 calculations. Conventional structural mechanics applications would normally calculate load on 36 system elements and compare the loads to failure criteria. Several such conventional 37 calculations have been performed and show that the seal elements exist in a favorable, 38 compressive stress state that is low in comparison to the strength of the seal materials. Thermal 39 analyses have been performed to examine the effects of concrete heat of hydration and heat 40 transfer for asphalt elements. Coupling between damaged rock and fluid flow and between the 41 density and permeability of the consolidating salt column is evaluated within the scope of 42 structural calculations. The appendices provide descriptions of various structural calculations 43

conducted as part of the design study. The purpose of each calculation varies; however, the
 calculations generally address one or more of the following concerns: (1) stability of the
 component, (2) influences of the component on hydrological properties of the seal and
 surrounding rock, or (3) construction methods. Stability calculations address:

- potential for thermal cracking of concrete;
 structural loads on seal components resulting from salt creep, gravity, swelling clay, dynamic compaction, or possible repository-generated gas pressures.
 Structural calculations defining input conditions to hydrological calculations include:
 spatial extent of the DRZ within the Salado Formation salt beds as a function of depth, time, and seal material;
 fracturing and DRZ development within Salado Formation interbeds;
- shaft-closure induced consolidation of compacted salt columns; and
- impact of pore pressures on salt consolidation.
- 14 Construction analyses examine:

15

16

- placement and structural performance of asphalt waterstops, and
- potential subsidence reduction through backfilling the shaft station areas.

Structural calculations model shaft features including representation of the host rock and its
 damaged zone as well as the seal materials themselves. Two important structural calculations
 discussed below are unique to shaft seal applications.

DRZ Behavior. The development and subsequent healing of a DRZ that forms in the rock mass 20 surrounding the WIPP shafts is a significant concern in the seal design. It is well known that a 21 DRZ will develop in rock salt adjacent to the shaft upon excavation. Placement of rigid 22 components in the shaft promotes healing within the salt DRZ as seal elements restrain inward 23 creep and reduce the stress difference. Two computer models to calculate development and 24 extent of the salt DRZ are used. The first model uses a ratio of stress invariants to predict 25 fracture; the second approach uses a damage stress criterion. The temporal and spatial extent 26 of the DRZ along the entire shaft length is evaluated. Several analyses are performed to 27 examine DRZ behavior of the rock salt surrounding the shaft. The time-dependent DRZ 28 development and subsequent healing in the Salado salt surrounding each of the four seal 29 materials are considered. All seal materials below a depth of about 300 m provide sufficient 30 rigidity to heal the DRZ, a phenomenon that occurs quickly around rigid components near the 31 shaft bottom. An extensive calculation is made of construction effects on the DRZ during 32 placement of the asphalt-concrete waterstops. The time-dependent development of the DRZ 33 within anhydrite and polyhalite interbeds of the Salado Formation is calculated. For all interbeds, 34 the factor of safety against shear or tensile fracturing increases with depth into the rock 35 surrounding the shaft wall. These results indicate that a continuous DRZ will not develop in 36 nonsalt Salado rocks. Rock mechanics analysis also determines which of the near surface 37

lithologies fracture in the proximity of the shaft. Results from these rock mechanics analyses are
 used as input conditions for the fluid-flow analyses.

Compacted Salt Behavior. Unique application of crushed salt as a seal component required 3 development of a constitutive model for salt reconsolidation. The model developed includes a 4 nonlinear elastic component and a creep consolidation component. The nonlinear elastic 5 modulus is density-dependent, based on laboratory test data performed on WIPP crushed salt. 6 Creep consolidation behavior of crushed salt is based on three candidate models whose 7 parameters are obtained from model fitting to hydrostatic and shear consolidation test data 8 gathered for WIPP crushed salt. The model for consolidating crushed salt is used to predict 9 permeability of the salt column. The seal system prevents fluid transport to the consolidating salt 10 column to ensure that pore pressure does not unacceptably inhibit the reconsolidation process. 11 Calculations made to estimate fractional density of the crushed salt seal as a function of time, 12 depth, and pore pressure show consolidation time increases as pore pressure increases, as 13 expected. At a constant pore pressure of one atmosphere, compacted salt will increase from its 14 initial fractional density of 90% to 96% within 40, 80, and 120 years after placement at the 15 bottom, middle, and top of the salt component, respectively. At a fractional density of 96%, the 16 permeability of reconsolidating salt is approximately 10⁻¹⁸ m². A pore pressure of 2 MPa 17 increases times required to achieve a fractional density of 96% to 92 years, 205 years, and 560 18 years at the bottom, middle, and top of the crushed salt column, respectively. A pore pressure of 19 4 MPa would effectively prevent reconsolidation of the crushed salt within 1,000 years. Fluid 20 flow calculations show only minimal transport of fluids to the salt column, so pore pressure 21 equilibrium in the consolidating salt does not occur before low permeabilities (~10⁻¹⁸ m²) are 22 achieved. 23

24 Hydrologic Evaluations

The ability of the shaft seal system to satisfy design guidance is determined by the performance 25 of the actual seal components within the physical setting in which they are constructed. 26 Important elements of the physical setting are hydraulic gradients of the region, properties of the 27 lithologic units surrounding a given seal component, and potential gas generation within the 28 repository. Hydrologic evaluations focus on processes that could result in fluid flow through the 29 shaft seal system and the ability of the seal system to limit any such flow. Transport of 30 radiological or hazardous constituents will be limited if the carrier fluids are similarly limited. 31 Physical processes that could impact seal system performance have been incorporated into four 32 models. These models evaluate: (1) downward migration of groundwater from the Rustler 33 Formation, (2) gas migration and reconsolidation of the crushed salt seal component. (3) 34 upward migration of brines from the repository, and (4) flow between water-bearing zones in the 35 Rustler Formation. 36

Downward Migration of Rustler Groundwater. The shaft seal system is designed to limit 37 aroundwater flowing into and through the shaft sealing system. The principal source of 38 groundwater to the seal system is the Culebra Member of the Rustler Formation. No significant 39 sources of groundwater exist within the Salado Formation; however, brine seepage has been 40 noted at a number of the marker beds and is included in the models. Downward migration of 41 Rustler groundwater is limited to ensure that liquid saturation of the compacted salt column 42 does not impact the consolidation process and to limit quantities of brine reaching the repository 43 horizon. Consolidation of the compacted salt column will be most rapid immediately following 44 seal construction. Simulations conducted for the 200-year period following closure demonstrate 45 that, during this initial period, downward migration of Rustler groundwater is insufficient to 46

1 impact the consolidation process. Rock mechanics analyses show that this period encompasses

- 2 the reconsolidation process. Lateral migration of brine through the marker beds is quantified in
- 3 the analysis and shown to be inconsequential. At steady-state, the flow rate is most dependent
- 4 on permeability of the system. Potential flow paths within the seal system consist of the seal
- 5 material, an interface with the surrounding rock, and the host rock DRZ. Low permeability is
- 6 specified for the engineered materials, and construction methods ensure a tight interface. Thus
- 7 the flow path most likely to impact performance is the DRZ. Effects of the DRZ and sensitivity of
- 8 the seal system performance to both engineered and host rock barriers show that the DRZ is
- 9 successfully mitigated by the proposed design.

Gas Migration and Salt Column Consolidation. A multi-phase flow model of the lower seal 10 system evaluates the performance of components extending from the middle concrete-asphalt 11 waterstop located at the top of the salt column to the repository horizon for 200 years following 12 closure. During this time period, the principal fluid sources to the model consist of potential gas 13 generated by the waste and lateral brine migration within the Salado Formation. The predicted 14 downward migration of a small quantity of Rustler groundwater (discussed above) is included in 15 this analysis. Effects of gas generation are evaluated for three different repository 16 repressurization scenarios, which simulate pressures as high as 14 MPa. Model results predict 17 that high repository pressures do not produce appreciable differences in the volume of gas 18 migration over the 200-year simulation period. Relatively low gas flow is a result of the low 19 permeability and rapid healing of the DRZ around the lower concrete-asphalt waterstop. 20

Upward Migration of Brine. The Salado Formation is overpressurized with respect to the measured heads in the Rustler, and upward migration of contaminated brines could occur through an inadequately sealed shaft. Results from the model discussed above demonstrate that the crushed salt seal will reconsolidate to a very low permeability within 100 years following repository closure. Structural results show that the DRZ surrounding the long-term clay and crushed salt seal components will completely heal within the first several decades. Model calculations predict that very little brine flows from the repository to the Rustler/Salado contact.

Intra-Rustler Flow. Based on head differences between the various members of the Rustler 28 Formation, nonhydrostatic conditions exist within the Rustler Formation. Therefore, the potential 29 exists for vertical flow within water-bearing strata within the Rustler. The two units with the 30 greatest transmissivity within the Rustler are the Culebra and the Magenta dolomites, which 31 have the greatest potential for interflow. The relatively low undisturbed permeabilities of the 32 mudstone and anhydrite units separating the Culebra and the Magenta naturally limit crossflow. 33 However, the construction and subsequent closure of the shaft provide a potentially permeable 34 vertical conduit connecting water-bearing units. The primary motivation for limiting formation 35 crossflow within the Rustler is to prevent mixing of formation waters within the Rustler, as 36 required by State of New Mexico statute. Commonly, such an undertaking would limit migration 37 of higher dissolved solids (high-density) groundwater into lower dissolved solids groundwater. In 38 the vicinity of the WIPP site, the Culebra has a higher density groundwater than the Magenta, 39 and the potential for fluid migration between the two most transmissive units is from the unit with 40 the lower total dissolved solids to the unit with the higher dissolved solids. This calculation 41 shows that potential flow rates between the Culebra and the Magenta are insignificant. Under 42 expected conditions, intra-Rustler flow is expected to be of such a limited quantity that (1) it will 43 not affect either the hydraulic or chemical regime within the Culebra or the Magenta and (2) it 44 will not be detrimental to the seal system itself. 45

1 Concluding Remarks

The principal conclusion is that an effective, implementable shaft seal system has been 2 designed for the WIPP. Design guidance is addressed by limiting any transport of fluids within 3 the shaft, thereby limiting transport of hazardous material to regulatory boundaries. The 4 application or adaptation of existing technologies for placement of seal components combined 5 with the use of available, common materials provide confidence that the design can be 6 constructed. The structural setting for seal elements is compressive, with shear stresses well 7 below the strength of seal materials. Because of the favorable hydrologic regime coupled with 8 the low intrinsic permeability of seal materials, long-term stability of the shaft seal system is 9 expected. Credibility of these conclusions is bolstered by the basic design approach of using 10 multiple components to perform each sealing function and by using extensive lengths within the 11 shafts to effect a sealing system. The shaft seal system adequately meets design requirements 12 and can be constructed. 13

14 **1.** Introduction

15 **1.1 Purpose of Compliance Submittal Design Report**

This report documents the detailed design of the shaft sealing system for the Waste Isolation 16 Pilot Plant (WIPP). The design documented in this report builds on the concepts and preliminary 17 evaluations presented in the Sealing System Design Report issued in 1995 (DOE, 1995). The 18 report contains a detailed description of the design and associated construction procedures, 19 material specifications, analyses of structural and fluid flow performance, and design drawings. 20 The design documented in this report forms the basis for the shaft sealing system which will be 21 constructed under the authority of the hazardous waste facility Permit issued by NMED and as 22 required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111(b) and 264.601(a)). 23

24 **1.2 WIPP Description**

The WIPP is designed as a full-scale, mined geological repository for the safe management, storage, and disposal of transuranic (**TRU**) radioactive wastes and TRU mixed wastes generated by US government defense programs. The facility is located near Carlsbad, New Mexico, in the southeastern portion of the state. The underground facility (Figure G2-1) consists of a series of shafts, drifts, panels, and disposal rooms. Four shafts, ranging in diameter from 3.5 to 6.1 m, connect the disposal horizon to the surface. Sealing of these four shafts is the focus of this report.

The disposal horizon is at a depth of approximately 655 m in bedded halite within the Salado 32 Formation. The Salado is a sequence of bedded evaporites approximately 600 m thick that were 33 deposited during the Permian Period, which ended about 225 million years ago. Salado salt has 34 been identified as a good geologic medium to host a nuclear waste repository because of 35 several favorable characteristics. The characteristics present at the WIPP site include very low 36 permeability, vertical and lateral stratigraphic extent, tectonic stability, and the ability of salt to 37 creep and ultimately entomb material placed in excavated openings. Creep closure also plays 38 an important role in the shaft sealing strategy. 39

The WIPP facility must be determined to be in compliance with applicable regulations prior to the disposal of waste. After the facility meets the regulatory requirements, disposal rooms will be filled with containers holding TRU wastes of various forms. Wastes placed in the drifts and

- disposal rooms will be at least 150 m from the shafts. Regulatory requirements include use of
- 2 both engineered and natural barriers to limit migration of hazardous constituents from the
- 3 repository to the accessible environment. The shaft seals are part of the engineered barriers.

4 **1.3** Performance Objective for WIPP Shaft Seal System

5 Each of the four shafts from the surface to the underground repository must be sealed to limit

6 hazardous material release to the accessible environment and to limit groundwater flow into the

7 repository. Although the seals will be permanent, the regulatory period applicable to the

8 repository system analyses is 10,000 years.

9 1.4 Sealing System Design Development Process

This report presents a conservative approach to shaft sealing system design. Shaft sealing 10 system performance plays a crucial role in meeting regulatory radionuclide and hazardous 11 constituents release requirements. Although all engineering materials have uncertainties in 12 properties, a combination of available, low-permeability materials can provide an effective 13 sealing system. To reduce the impact of system uncertainties and to provide a high level of 14 assurance of compliance, numerous components are used in this sealing system. Components 15 in this design include long columns of clay, densely compacted crushed salt, a waterstop of 16 asphaltic material sandwiched between massive low-permeability concrete plugs, a column of 17 asphalt, and a column of earthen fill. Different materials perform identical functions within the 18 design, thereby adding confidence in the system performance through redundancy. 19

20 The design is based on common materials and construction methods that utilize available

technologies. When choosing materials, emphasis was given to permeability characteristics and mechanical properties of seal materials. However, the system is also chemically and physically

compatible with the host formations, enhancing long-term performance.

²³ compatible with the host formations, enhancing long-term performance.

24 Recent laboratory experiments, construction demonstrations, and field test results have been

added to the broad and credible database and have supported advances in modeling capability.

Results from a series of multi-year, in situ, small-scale seal performance tests show that

bentonite and concrete seals maintain very low permeabilities and show no deleterious effects
 in the WIPP environment. A large-scale dynamic compaction demonstration established that

in the WIPP environment. A large-scale dynamic compaction demonstration established that crushed salt can be successfully compacted. Laboratory tests show that compacted crushed

salt consolidates through creep closure of the shaft from initial conditions achieved in dynamic

compaction to a dense salt mass with regions where permeability approaches that of in situ salt.

These technological advances have allowed more credible analysis of the shaft sealing system.

The design was developed through an interactive process involving a design team consisting of technical specialists in the design and construction of underground facilities, materials behavior,

rock mechanics analysis, and fluid flow analysis. The design team included specialists drawn

³⁶ from the staff of Sandia National Laboratories, Parsons Brinckerhoff Quade and Douglas, Inc.

37 (contract number AG-4909), INTERA, Inc. (contract number AG-4910), and RE/SPEC Inc.

(contract number AG-4911), with management by Sandia National Laboratories. The

contractors developed a quality assurance program consistent with the Sandia National

40 Laboratories Quality Assurance Program Description for the WIPP project. All three contractors

- received quality assurance support visits and were audited through the Sandia National
- Laboratories audit and assessment program. Quality assurance (QA) documentation is
- 43 maintained in the Sandia National Laboratories WIPP Central Files. Access to project files for

- each contractor can be accomplished using the contract numbers specified above. In addition to
- 2 the contractor support, technical input was obtained from consultants in various technical
- 3 specialty areas.
- 4 Formal preliminary and final design reviews have been conducted on the technical information
- 5 documented in the report. In addition, technical, management, and QA reviews have been
- 6 performed on this report. Documentation is in the WIPP Central File.
- 7 It is recognized that additional information, such as on specific seal material or formation
- 8 characteristics, on the sensitivity of system performance to component properties, on placement
- 9 effectiveness, and on long-term performance, could be used to simplify the design and perhaps
- reduce the length or number of components. Such design optimization and associated
- simplifications are left to future research that may be used to update the compliance evaluations
- completed between now and the time of actual seal emplacement.

13 1.5 Organization of Document

This report contains an Executive Summary, 10 sections, and 5 appendices. The body of the report does not generally contain detailed backup information; this information is incorporated by reference or in the appendices.

- 17 The Executive Summary is a synopsis of the design and the supporting discussions related to
- 18 seal materials, construction procedures, structural analyses, and fluid flow analyses.
- Introductory material in Section 1 sets the stage for and provides a "road map" to the remainder
 of the report.
- Site characteristics that detail the setting into which the seals would be placed are documented
- in Section 2. These characteristics include the WIPP geology and stratigraphy for both the
- region and the shafts as well as a brief discussion of rock mechanics considerations of the site
- that impact the sealing system. Regional and local characteristics of the hydrologic and
- 25 geochemical settings are also briefly discussed.
- 26 Section 3 presents the design guidance used for development of the shaft sealing system
- design. Seal-related guidance from applicable regulations is briefly described. The design
- guidance is then provided along with the design approach used to implement the guidance. The
- guidance forms the basis both for the design and for evaluations of the sealing system
- ³⁰ presented in other sections.
- The shaft sealing system is documented in Section 4; detailed drawings for the design are
- provided in Appendix G2-E. The seal components, their design, and their functions are
- discussed for the Salado, the Rustler, and the overlying formations.
- The sealing materials are described briefly in Section 5, with more detail provided in the
- materials specifications (Appendix G2-A). The materials used in the various seal components
- ³⁶ are discussed along with the reasons they are expected to function as intended. Material
- properties including permeability, strength, and mechanical constitutive response are given for
- each material. Brief discussions of expected compatibility, performance, construction
- techniques, and other characteristics relevant to the WIPP setting are also given.

1 Section 6 contains a brief description of the construction techniques proposed for use. General

2 site and sealing preparation activities are discussed, including construction of a multi-deck stage

3 for use throughout the placement of the components. Construction procedures to be used for

4 the various types of components are then summarized based on the more detailed discussions

5 provided in Appendix G2-B.

Section 7 summarizes structural analyses performed to assess the ability of the shaft sealing 6 system to function in accordance with the design guidance provided in Section 3 and to provide 7 input to hydrological calculations. The methods and computer programs, the models used to 8 simulate the behavior of the seal materials and surrounding salt, and the results of the analyses 9 are discussed. Particular emphasis is placed on the evaluations of the behavior of the disturbed 10 rock zone. Details of the structural analyses are presented in Appendix D of Waste Isolation 11 Pilot Plant Shaft Sealing System Compliance Submittal Design Report ("Compliance Submittal 12 Design Report") (Sandia, 1996). Section 8 summarizes fluid flow analyses performed to assess 13 the ability of the shaft sealing system to function in accordance with the design guidance 14 provided in Section 3. Hydrologic evaluations are focused on processes that could result in fluid 15 flow through the shaft seal system and the ability of the seal system to limit such flow. 16 Processes evaluated are downward migration of groundwater from the overlying formation, gas 17 migration and reconsolidation of the crushed salt component, upward migration of brines from 18 the repository, and flow between water-bearing zones in the overlying formation. Hydrologic 19 models are described and the results are discussed as they relate to satisfying the design 20 guidance, with extensive reference to Appendix C of the Compliance Submittal Design Report 21 (Sandia, 1996) that documents details of the flow analyses. Conclusions drawn about the 22 performance of the WIPP shaft sealing system are described in Section 9. The principal 23 conclusion that an effective, implementable design has been presented is based on the 24 presentations in the previous sections. A reference list that documents principal references used 25 in developing this design is then provided. 26

- 27 The three appendices that follow provide details related to the following subjects:
- 28 Appendix G2-A Material Specification
- 29 Appendix G2-B Shaft Sealing Construction Procedures
- 30 Appendix G2-E Design Drawings (separate volume)

31 **1.6 Systems of Measurement**

Two systems of measurement are used in this document and its appendices. Both the System International d'Unites (SI) and English Gravitational (*fps* units) system are used. This usage corresponds to common practice in the United States, where SI units are used for scientific studies and *fps* units are used for facility design, construction materials, codes, and standards. Dual dimensioning is used in the design description and other areas where this use will aid the reader.

1 2. Site Geologic, Hydrologic, and Geochemical Setting

The site characteristics relevant to the sealing system are discussed in this section. The location and geologic setting of the WIPP are discussed first to provide background. The geology and stratigraphy, which affect the shafts, are then discussed. The hydrologic and geochemical settings, which influence the seals, are described last.

6 2.1 Introduction

The WIPP site is located in an area of semiarid rangeland in southeastern New Mexico. The
nearest major population center is Carlsbad, 42 km west of the WIPP. Two smaller
communities, Loving and Malaga, are about 33 km to the southwest. Population density close to
the WIPP is very low: fewer than 30 permanent residents live within a 16-km radius.

11 2.2 Site Geologic Setting

12 Geologically the WIPP is located in the Delaware Basin, an elongated depression that extends

13 from just north of Carlsbad southward into Texas. The Delaware Basin is bounded by the

14 Capitan Reef (see Figure G2-2). The basin covers over 33,000 km² and is filled with 15 sedimentary rocks to depths of 7,300 m (Hills, 1984). Rock units of the Delaware Basin

(representing the Permian System through the Quaternary System) are listed in Figure G2-3.

Minimal tectonic activity has occurred in the region since the Permian Period (Powers et al., 17 1978). Faulting during the late Tertiary Period formed the Guadalupe and Delaware Mountains 18 along the western edge of the basin. The most recent igneous activity in the area occurred 19 during the mid-Tertiary Period about 35 million years ago and is evidenced by a dike in the 20 subsurface 16 km northwest of the WIPP. Major volcanic activity last occurred more than 1 21 billion years ago during Precambrian time (Powers et al., 1978). None of these processes 22 affected the Salado Formation at the WIPP. Therefore, seismic-related design criteria are not 23 included in the current seal systems design guidelines. 24

25 2.2.1 Regional WIPP Geology and Stratigraphy

The Delaware Basin began forming with crustal subsidence during the Pennsylvanian Period 26 27 approximately 300 million years ago. Relatively rapid subsidence over a period of about 14 million years resulted in the deposition of a sequence of deep-water sandstones, shales, and 28 limestones rimmed by shallow-water limestone reefs such as the Capitan Reef (see Figure G2-29 2). Subsidence slowed during the late Permian Period. Evaporite deposits of the Castile 30 Formation and the Salado Formation (which hosts the WIPP underground workings) filled the 31 basin and extended over the reef margins. The evaporites, carbonates, and clastic rocks of the 32 Rustler Formation and the Dewey Lake Redbeds were deposited above the Salado Formation 33 near the end of the Permian Period. The Santa Rosa and Gatuña Formations were deposited 34 after the close of the Permian Period. 35

From the surface downward to the repository horizon the stratigraphic units are the Quaternary surface sand sediments, Gatuña Formation, Santa Rosa Formation, Dewey Lake Redbeds, Rustler Formation, and Salado Formation. Three principal stratigraphic units (the Dewey Lake Redbeds, the Rustler Formation, and the Salado Formation) comprise all but the upper 15 to 30

40 m (50 to 100 ft) of the geologic section above the WIPP facility.

1 The Dewey Lake Redbeds consist of alternating layers of reddish-brown, fine-grained

2 sandstone and siltstone cemented with calcite and gypsum (Vine, 1963). The Rustler Formation

3 lies below the Dewey Lake Redbeds; this formation, the youngest of the Late Permian evaporite

4 sequence, includes units that provide potential pathways for radionuclide migration from the

5 WIPP. The five units of the Rustler, from youngest to oldest, are: (1) the Forty-niner Member, (2)

6 the Magenta Dolomite Member, (3) the Tamarisk Member, (4) the Culebra Dolomite Member,

7 and (5) an unnamed lower member.

8 The 250-million-year-old Salado Formation lies below the Rustler Formation. This unit is about

9 600 m thick and consists of three informal members. From youngest to oldest, they are: (1) an

10 upper member (unnamed) composed of reddish-orange to brown halite interbedded with

polyhalite, anhydrite, and sandstone, (2) a middle member (the McNutt Potash Zone) composed
 of reddish-orange and brown halite with deposits of sylvite and langbeinite; and (3) a lower

of reddish-orange and brown halite with deposits of sylvite and langbeinite; and (3) a lower member (unnamed) composed of mostly halite with lesser amounts of anhydrite, polyhalite, and

14 glauberite, with some layers of fine clastic material. These lithologic layers are nearly horizontal

at the WIPP, with a regional dip of less than one degree. The WIPP repository is located in the

unnamed lower member of the Salado Formation, approximately 655 m (2150 ft) below the

17 ground surface.

18 2.2.2 Local WIPP Stratigraphy

The generalized stratigraphy of the WIPP site, with the location of the repository, is shown in Figure G2-4. To establish the geologic framework required for the design of the WIPP facility shaft sealing system, an evaluation was performed to assess the geologic conditions existing in and between the shafts, where the individual shaft sealing systems will eventually be emplaced (DOE, 1995: Appendix G2-A). The study evaluated shaft stratigraphy, regional groundwater occurrence, brine occurrence in the exposed Salado Formation section, and the consistency between recorded data and actual field data.

Four shafts connect the WIPP underground workings to the surface, the (1) Air Intake Shaft (AIS), (2) Exhaust Shaft, (3) Salt Handling Shaft, and (4) Waste Shaft. Stratigraphic correlation and evaluation of the unit contacts show that lithologic units occur at approximately the same levels in all four shaft locations. Some stratigraphic contact elevations vary because of regional structure and stratigraphic thinning and thickening of units. However, the majority of the stratigraphic contacts used to date are suitable for engineering design reference because they intersect all four shafts.

33 2.2.3 Rock Mechanics Setting

The WIPP stratigraphy includes rock types that exhibit both brittle and ductile behaviors. The 34 majority of the stratigraphy intercepted by the shafts consists of the Salado Formation, which is 35 predominantly halite. The primary mechanical behavior of halitic rocks is creep. Except near 36 free surfaces (such as the shaft wall), the salt rocks will remain tight and undisturbed despite the 37 long-term creep deformation they sustain. The other rock types within the Salado Formation are 38 anhydrites and polyhalites. These two rock types are typically brittle, stiff, and exhibit high 39 strength in laboratory tests. The structural strength of particular anhydritic rock layers, however, 40 depends on the thickness of the layers, which range from thin (<1 m) to fairly thick (10 m or 41 more). Brittle failure of these noncreeping rocks can occur as they restrain, or attempt to 42 restrain, the creep of the salt above and below the stiff layer. Although thick layers can resist the 43

induced stresses, thin layers are fractured in tension by the salt creep. Because the deformation
 in the bounding salt is time dependent, the damage in the brittle rock is also time dependent.

3 Above the Salado Formation, the Rustler Formation stratigraphy consists of relatively strong

4 limestones and siltstones. The shaft excavation is the only significant disturbance to these

5 rocks. Any subsurface subsidence (deformation) or loading induced by the presence of the

⁶ repository are negligible in a rock mechanics sense.

7 Regardless of rock type, the shafts create a disturbed zone in the surrounding rock.

8 Microfracturing will occur in the rock adjacent to the shaft wall, where confining stresses are low

9 or nonexistent. The extent of the zone depends on the rock strength and the prevailing stress

state, which is depth dependent. In the salt rocks, microfracturing occurs to form the disturbed zone both at the time of excavation and later as dilatant creep deformations occur. In the brittle

11 zone both at the time of excavation and later as dilatant creep deformations occur. In the brittle 12 rocks, the disturbance occurs at the time of excavation and does not worsen with time. The

extent of disturbed zones in the salt and brittle rocks can be calculated, as will be described in

14 Section 7 and Appendix D in the Compliance Submittal Design Report (Sandia, 1996).

Preventing the salt surrounding the shafts from creeping causes reintroduction of stresses that reverse the damage process and cause healing (Van Sambeek et al., 1993). The seal system design relies on this principle for sealing the disturbed zone in salt. In the brittle rocks, grouting of the damage is a viable means of reducing the interconnected fractures that increase the

19 permeability of the rock.

20 2.3 Site Hydrologic Setting

The WIPP shafts penetrate approximately 655 m (2150 ft) of sediments and rocks. From a hydrogeologic perspective, relevant information includes the permeability of the water-bearing units, the thickness of the water-bearing units, and the observed vertical pressure (head) gradients expected to exist after shaft construction and ambient pressure recovery. This section will discuss these three aspects of the site hydrogeology. The geochemistry of the pore fluids adjacent to the shaft system is also important hydrogeologic information and will be provided in Section 2.4.

28 **2.3.1 Hydrostratigraphy**

The WIPP shafts penetrate Quaternary surface sediments, the Gatuña Formation, the Santa 29 Rosa Formation, the Dewey Lake Redbeds, the Rustler Formation, and the Salado Formation. 30 The Rustler Formation contains the only laterally-persistent water-bearing units in the WIPP 31 vicinity. As a result, flow-field characterization, regional flow-modeling, and performance 32 assessment off-site release scenarios focus on the Rustler Formation. The hydrogeology of the 33 stratigraphic units in contact with the upper portion of the AIS sealing system is fairly well known 34 from detailed hydraulic testing of the Rustler Formation at well H-16 located 17 m from the AIS 35 (Beauheim, 1987). The H-16 borehole was drilled in July and August 1987 to monitor the 36 hydraulic responses of the Rustler members to the drilling and construction of the AIS. During 37 the drilling of H-16, each member of the Rustler Formation was cored. In addition, detailed drill-38 stem, pulse, and slug hydraulic tests were performed in H-16 on the members of the Rustler. 39 Through the detailed testing program at H-16, the permeability of each of the Rustler members 40 was estimated. Detailed mapping of the AIS by Holt and Powers (1990) and other investigators 41 provided information on the location of wet zones and weeps within the Salado Formation. This 42

1 information will be summarized below. The reader, unless particularly interested in this subject,

2 should proceed to Section 2.3.2.

Water-bearing zones have been observed in units above the Rustler Formation in the WIPP site 3 vicinity. However, drilling in the Dewey Lake Redbeds has not identified any continuous 4 saturated units at the WIPP site. Water-bearing units within stratigraphic intervals above the 5 Rustler are typically perched saturated zones of very low yield. Thin perched groundwater 6 intervals have been encountered in WIPP wells H-1, H-2, and H-3 (Mercer and Orr, 1979). The 7 only Dewey Lake Redbed wells that have sufficient yields for watering livestock are the James 8 Ranch wells, the Pocket well, and the Fairfield well (Brinster, 1991). These wells are located to 9 the south of the WIPP and are not in the immediate vicinity of the WIPP shafts. 10

The Dewey Lake Redbeds overlie the Rustler Formation. The Rustler is composed of five
members defined by lithology. These are, in ascending order, the unnamed lower member, the
Culebra dolomite, the Tamarisk, the Magenta dolomite, and the Forty-niner (see Figure G2-4).
Of these five members, the unnamed lower member, the Culebra, and the Magenta are the
most transmissive units in the Rustler. The Tamarisk and the Forty-niner are aquitards within
the Rustler and have very low permeabilities relative to the three members listed above.

To the east of the shafts in Nash Draw, the Rustler/Salado contact has been observed to be 17 permeable and water-bearing. This contact unit has been referred to as the "brine aquifer" 18 (Mercer, 1983). The brine aquifer is not reported to exist in the vicinity of the shafts. The 19 hydraulic conductivity of the Rustler/Salado contact in the vicinity of the shafts is reported to be 20 approximately 4×10^{-11} m/s, which is equivalent to a permeability of 6×10^{-18} m² using 21 reference brine fluid properties (Brinster, 1991). The unnamed lower member was hydraulic 22 tested at well H-16 in close proximity to the AIS. The maximum permeability of the unnamed 23 lower member was interpreted to be 2.2×10^{-18} m² and was attributed to the unnamed lower 24 member claystone by Beauheim (1987), which correlates to the transition and bioturbated 25 clastic zones of Holt and Powers (1990). 26

The Culebra Dolomite Member is the most transmissive member of the Rustler Formation in the vicinity of the WIPP site and is the most transmissive saturated unit in contact with the shaft sealing system. The Culebra is an argillaceous dolomicrite which contains secondary porosity in the form of abundant vugs and fractures. The permeability of the Culebra varies greatly in the vicinity of the WIPP and is controlled by the condition of the secondary porosity (fractures). The permeability of the Culebra in the vicinity of the shafts is approximately 2.1 x 10⁻¹⁴ m².

The Tamarisk Member is composed primarily of massive, lithified anhydrite, including anhydrite 2, mudstone 3, and anhydrite 3. Testing of the Tamarisk at H-16 was unsuccessful. The estimated transmissivity of the Tamarisk at H-16 is one to two orders of magnitude lower than the least-transmissive unit successfully tested at H-16, which results in a permeability range from 4.6 × 10⁻²⁰ to 4.6 × 10⁻¹⁹ m². Anhydrites in the Rustler have an approximate permeability of 1 × 10⁻¹⁹ m². The permeability of mudstone 3 is 1.5 × 10⁻¹⁹ m² (Brinster, 1991).

The Magenta is a dolomite that is typically less permeable than the Culebra. The Magenta Dolomite Member overlies the Tamarisk Member. The Magenta is an indurated, gypsiferous, arenaceous, dolomite that Holt and Powers (1990) classify as a dolarenite. The dolomite grains are primarily composed of silt to fine sand-sized clasts. Wavy to lenticular bedding and ripple cross laminae are prevalent through most of the Magenta. Holt and Powers (1990) estimate that 1 inflow to the shaft from the Magenta during shaft mapping was less than 1 gal/min. The

² Magenta has a permeability of approximately 1.5×10^{-15} m² (Saulnier and Avis, 1988).

3 The Forty-niner Member is divided into three informal lithologic units. The lowest unit is

anhydrite 4, a laminated anhydrite having a gradational contact with the underlying Magenta.

5 Mudstone 4 overlies anhydrite 4 and is composed of multiple units containing mudstones,

6 siltstones, and very fine sandstones. Anhydrite 5 is the uppermost informal lithologic unit of the

Forty-niner Member. The permeability of mudstone 4, determined from the pressure responses in the Forty given interval of 1140 to the drilling of the AlQ is 2.0×10^{-16} m² (referred to go the

in the Forty-niner interval of H-16 to the drilling of the AIS, is $3.9 \times 10^{-16} \text{ m}^2$ (referred to as the

9 Forty-niner claystone by Avis and Saulnier, 1990).

The Salado Formation is a very low permeability formation that is composed of bedded halite, 10 polyhalite, anhydrite, and mudstones. Inflows in the shafts have been observed over select 11 intervals during shaft mapping, but flows are below the threshold of quantification. In some 12 cases these weeps are individual, lithologically distinct marker beds, and in some cases they 13 are not. Directly observable brine flow from the Salado Formation into excavated openings is a 14 short-lived process. Table G2-1 lists the brine seepage intervals identified by Holt and Powers 15 (1990) during their detailed mapping of the AIS. Seepage could be indicated by a wet rockface 16 or by the presence of precipitate from brine evaporation on the shaft rockface. The zones listed 17 in Table G2-1 make up less than 10% of the Salado section that is intersected by the WIPP 18 shafts. 19

20 21

Table G2-1 Salado Brine Seepage Intervals⁽¹⁾

Stratigraphic Unit	Lithology	Thickness (m)	
Marker Bed 103	Anhydrite	5.0	
Marker Bed 109	Anhydrite	7.7	
Vaca Triste	Mudstone	2.4	
Zone A	Halite	2.9	
Marker Bed 121	Polyhalite	0.5	
Union Anhydrite	Anhydrite	2.3	
Marker Bed 124	Anhydrite	2.7	
Zone B	Halite	0.9	
Zone C	Halite	2.7	
Zone D	Halite	3.2	
Zone E	Halite	0.6	
Zone F	Halite	0.9	
Zone G	Halite	0.6	
Zone H	Halite	1.8	
Marker Bed 129	Polyhalite	0.5	
Zone I	Halite	1.7	
Zone J	Halite	1.2	

⁽¹⁾ After US DOE, 1995.

1 To gain perspective into the important stratigraphic units from a hydrogeologic view, the

2 permeability and thickness of the units adjacent to the shafts can be compared. Table G2-2 lists

3 the lithologic units in the Rustler and the Salado Formations with their best estimate

4 permeabilities and their thickness as determined from the AIS mapping. The stratigraphy of the

5 units overlying the Rustler is not considered in Table G2-2 because these units are typically not

6 saturated in the vicinity of the WIPP shafts. The overlying sediments account for approximately

7 25% of the stratigraphy column adjacent to the shafts.

8 Because permeability varies over several orders of magnitude, the log of the permeability is also

9 listed to simplify comparison between units. Table G2-2 shows that by far the two most

transmissive zones occur in the Rustler Formation; these are the Culebra and Magenta

dolomites. These units are relatively thin when compared to the combined Rustler and Salado

thickness adjacent to the shafts (3% of Rustler and Salado combined thickness). The Magenta

and the Culebra are the only two units that are known to possess permeabilities higher than $1 \times 10^{-18} \text{ m}^2$.

15 16

Formation	Member/Lithology	Undisturbed Permeability (m ²)	Thickness (m)
Rustler	Anhydrite ⁽¹⁾	1.0×10^{-19}	46.7
Rustler	Mudstone 4	3.9 × 10 ^{−16}	4.4
Rustler	Magenta	1.5 × 10 ^{−15}	7.8
Rustler	Mudstone 3	1.5 × 10 ^{−19}	2.9
Rustler	Culebra	2.1 × 10 ⁻¹⁴	8.9
Rustler	Transition/ Bioturbated Clastics	2.2 × 10 ⁻¹⁸	18.7
Salado	Halite	1.0 × 10 ⁻²¹	356.6
Salado	Polyhalite	3.0 × 10 ⁻²¹	10.9
Salado	Anhydrite	1.0 × 10 ⁻¹⁹	28.2

 Table G2-2

 Permeability and Thickness of Hydrostratigraphic Units in Contact with Seals

⁽¹⁾ Anhydrite 5, Anhydrite 4, Anhydrite 3, and Anhydrite 2

17 The vast majority (97%) of the rocks adjacent to the shaft in the Rustler and the Salado

Formations are low permeability ($<1 \times 10^{-18} \text{ m}^2$). The conclusion that can be drawn from

reviewing Table G2-2 is that the shafts are located hydrogeologically in a low permeability, low

20 groundwater flow regime. Inflow measurements have historically been made at the shafts, and

²¹ observable flow is attributed to leakage from the Rustler Formation.

Flow modeling of the Culebra has demonstrated that depressurization has occurred as a result of the sinking of the shafts at the site. Maximum estimated head drawdown in the Culebra at the centroid of the shafts was estimated by Haug et al. (1987) to be 33 m in the mid-1980s. This drawdown in the permeable units intersected by the shafts is expected because the shafts act as long-term constant pressure (atmospheric) sinks. Measurements of fluid flow into the WIPP shafts when they were unlined show a range from a maximum of 0.11 L/s (3,469 m³/yr)

measured in the Salt Handling Shaft on September 13, 1981 to a minimum of 0.008 L/s

29 (252 m³/yr) measured at the Waste Handling Shaft on August 6, 1987 (LaVenue et al., 1990).

The following summary of shaft inflow rates from the Rustler is based on a review of LaVenue et 1 2 al. (1990) and Cauffman et al. (1990). Shortly after excavation and prior to grouting and liner installation, the inflow into the Salt Handling Shaft was 0.11 L/s (3,469 m³/yr). The average flow 3 rate measured after shaft lining for the period from mid-1982 through October 1992 was 4 0.027 L/s (851 m³/yr). The average flow rate into the Waste Handling Shaft during the time 5 when the shaft was open and unlined was about 0.027 L/s (851 m³/yr). Between the first and 6 second grouting events (July 1984 to November 1987) the average inflow rate was 0.016 L/s 7 $(505 \text{ m}^3/\text{vr})$. No estimates were found after the second grouting. Inflow to the pilot holes for the 8 Exhaust Shaft averaged 0.028 L/s (883 m³/yr). In December 1984 a liner plate was grouted 9 across the Culebra. After this time, a single measurement of inflow from the Culebra was 10 0.022 L/s (694 m³/yr). After liner plate installation, three separate grouting events occurred at 11 the Culebra. No measurable flow was reported after the third grouting event in the summer of 12 1987. Flow into the AIS when it was unlined and draining averaged 0.044 L/s (1.388 m³/yr). 13 Since the Rustler has been lined, flow into the AIS has been negligible. 14

The majority of the flow represented by these shaft measurements originates from the Rustler. 15 This is clearly evident by the fact that lining of the WIPP shafts was found to be unnecessary in 16 the Salado Formation below the Rustler/Salado contact. When the liners were installed, flow 17 rates diminished greatly. Under sealed conditions, hydraulic gradients in rocks adjacent to the 18 shaft will diminish as the far-field pressures approach ambient conditions. The low-permeability 19 materials sealing the shaft combined with the reduction in lateral hydraulic gradients will likely 20 result in flow rates into the shaft that are several orders of magnitude less than observed under 21 open shaft or lined shaft conditions. 22

23 2.3.2 Observed Vertical Gradients

Hydraulic heads within the Rustler and between the Rustler and Salado Formations are not in hydrostatic equilibrium. Mercer (1983) recognized that heads at the Rustler Salado transition (referred to as the brine aquifer and not present in the vicinity of the WIPP shafts) indicate an upward hydraulic gradient from that zone to the Culebra. Later, with the availability of more head measurements within the Salado and Rustler members, Beauheim (1987) provided additional insight into the potential direction of vertical fluid movement within the Rustler. He reported that the hydraulic data indicate an upward gradient from the Salado to the Rustler.

Formation pressures in the Salado Formation have been decreased in the near vicinity of the WIPP underground facility. The highest, and thought to be least disturbed, estimated formation fluid pressure from hydraulic testing is 12.55 MPa estimated from interpretation of testing within borehole SCP01 in Marker Bed 139 (**MB139**) just below the underground facility horizon (Beauheim et al., 1993). The fresh-water head within MB139, based on the estimated static formation pressure of 12.55 MPa, is 1,663.6 m (5,458 ft) above mean sea level (**msl**).

Hydraulic heads in the Rustler have also been impacted by the presence of the WIPP shafts.
Impacts in the Culebra were significant in the 1980s with a large drawdown cone extending
away from the shafts in the Culebra (Haug et al., 1987). The undisturbed head of the Rustler
Salado contact in the vicinity of the AIS is estimated to be about 936.0 m (3,071 ft) msl (Brinster,
1991). The undisturbed head in the Culebra is estimated to be approximately 926.9 m (3,041 ft)
msl in the vicinity of the AIS (LaVenue et al., 1990). The undisturbed head in the Magenta is
estimated to be approximately 960.1 m (3,150 ft) msl (Brinster, 1991).

1 The disturbed and undisturbed heads in the Rustler are summarized in Table G2-3. Also

2 included is the freshwater head of MB139 based on hydraulic testing in the WIPP underground.

3 Consistent with the vertical flow directions proposed by previous investigators, estimated

4 vertical gradients in the vicinity of the AIS before the shafts were drilled indicate a hydraulic

⁵ gradient from the Magenta to the Culebra and from the Rustler/Salado contact to the Culebra.

6 There is also the potential for flow from the Salado Formation to the Rustler Formation.

- 7
- 8

 Table G2-3

 Freshwater Head Estimates in the Vicinity of the Air Intake Shaft

	Freshwa	ter Head (m asl)	
Hydrologic Unit	Undisturbed	Disturbed	Reference
Magenta Member	960.1 ¹	948.8 ² (H-16)	Brinster (1991) Beauheim (1987)
Culebra Member	926.9 ¹	915.0 ² (H-16)	LaVenue et al. (1990) Beauheim (1987)
Lower Unnamed Member	—	953.4 ² (H-16)	Beauheim (1987)
Rustler/Salado Contact	936.0 - 940.0 ¹	—	Brinster (1991)
Salado MB139	1,663.6 ²	—	Beauheim et al. (1993)

¹ Estimated from a contoured head surface plot based principally on well data collected prior to shaft construction. ² Measured through hydraulic testing and/or long-term monitoring.

9 2.4 Site Geochemical Setting

10 **2.4.1** Regional and Local Geochemistry in Rustler Formation and Shallower Units

11 The Rustler Formation, overlying the Salado Formation, consists of interbedded

anhydrite/gypsum, mudstone/siltstone, halite east of the WIPP site, and two layers of dolomite.

13 Principal occurrences of NaCl/MgSO₄ brackish to briny groundwater in the Rustler at the WIPP

site and to the north, west, and south are found (1) at the lower member near its contact with

the underlying Salado and (2) in the two dolomite members having a variable fracture-induced

secondary porosity. The mineralogy of the Rustler Formation is summarized in Table G2-4.

17 The five members of the Rustler Formation are described as follows: (1) The Forty-niner

18 Member is similar in lithology to the other non-dolomitic units but contains halite east of the

19 WIPP site. (2) The Magenta Member is another variably fractured dolomite/sulfate unit

20 containing sporadic occurrences of groundwater near and west of the WIPP site. (3) The

Tamarisk Member is dominantly anhydrite (locally altered to gypsum) with subordinate fine-

grained clastics, containing halite to the east of the WIPP site. (4) The Culebra Dolomite

23 Member is dominantly dolomite with subordinate anhydrite and/or gypsum, having a variable

fracture-induced secondary porosity containing regionally continuous occurrences of

25 groundwater at the WIPP site and to the north, west, and south. (5) An unnamed lower member 26 consists of sandstone, siltstone, mudstone, claystone, and anhydrite locally altered to gypsum,

and containing halite under most of the WIPP site and occurrences of brine at its base, mostly

28 west of the WIPP site.

Table G2-4

1 2

3

Chemical Formulas, Distributions, and Relative Abundance of Minerals in the Rustler and Salado Formations (after Lambert, 1992)

Mineral	Formula	Occurrence/Abundance
Amesite	(Mg4Al2)(Si2Al2)O10(OH)8	S, R
Anhydrite	CaSO ₄	SSS, RRR
Calcite	CaCO ₃	S, RR
Carnallite	KMgCl ₃ •6H ₂ O	SS†
Chlorite	(Mg,Al,Fe) ₁₂ (Si,Al) ₈ O ₂₀ (OH) ₁₆	S‡, R‡
Corrensite	Mixed-layer chlorite/smectite	S‡, R‡
Dolomite	CaMg(CO ₃) ₂	RR
Feldspar	(K,Na,Ca)(Si,Al) ₄ O ₈	S‡, R‡
Glauberite	Na2Ca(SO ₄) ₂	S
Gypsum	CaSO ₄ •2H ₂ O	S, RRR
Halite	NaCl	SSS, RRR
Illite	K1-1.5Al4(Si7-6.5Al1-1.5O20)(OH)4	S‡, R‡
Kainite	KMgCISO ₄ •3H ₂ O	SS†
Kieserite	MgSO4•H2O	SS†
Langbeinite	K ₂ Mg ₂ (SO ₄) ₃	S*
Magnesite	MgCO ₃	S, R
Polyhalite	K ₂ Ca ₂ Mg(SO ₄) ₄ •2H ₂ O	SS, R
Pyrite	FeS ₂	S, R
Quartz	SiO ₂	S‡, R‡
Serpentine	Mg ₃ Si ₂ O ₅ (OH) ₄	S‡, R‡
Smectite	(Ca _{1/2} ,Na) _{0.7} (Al,Mg,Fe) ₄ (Si,Al) ₈ O ₂₀ (OH) ₄ •nH ₂ O	S‡, R‡
Sylvite	KCI	SS*

Key to Occurrence/Abundance notations:

S = Salado Formation; R = Rustler Formation; $3 \times$ = abundant, $2 \times$ = common, $1 \times$ = rare or accessory; * = potash-ore mineral (never near surface); † = potash-zone non-ore mineral; ‡ = in claystone interbeds.

4 The Dewey Lake Redbeds, overlying the Rustler Formation, are the uppermost Permian unit;

5 they consist of siltstones and claystones locally transected by concordant and discordant

6 fractures that may contain gypsum. The Dewey Lake Redbeds contain sporadic occurrences of

7 groundwater that may be locally perched, mostly in the area south of the WIPP site. The

8 Triassic Dockum Group (undivided) rests on the Dewey Lake Redbeds in the eastern half of the

9 WIPP site and thickens eastward; it is a locally important source of groundwater for agricultural

10 and domestic use.

11 The Gatuña Formation, overlying the Dewey Lake Redbeds, occurs locally as channel and 12 alluvial pond deposits (sands, gravels, and boulder conglomerates). The pedogenic Mescalero

caliche is commonly developed on top of the Gatuña Formation and on many other erosionally

truncated rock types. Surficial dune sand, which may be intermittently damp, covers virtually all
 outcrops at and near the WIPP site. Siliceous alluvial deposits southwest of the WIPP site also
 contain potable water. The geochemistry of groundwater found in the Rustler Formation and

4 Dewey Lake Redbeds is summarized in Table G2-5.

5 6

7

Table G2-5
Major Solutes in Selected Representative Groundwater from the Rustler Formation and Dewey
Lake Redbeds, in mg/L (after Lambert, 1992)

Well	Date	Zone	Ca	Mg	Na	к	SO4	CI
WIPP-30	July 1980	R/S	955	2770	121,000	2180	7390	192,000
WIPP-29	July 1980	R/S	1080	2320	36,100	1480	12,000	58,000
H-5B	June 1981	Cul	1710	2140	52,400	1290	7360	89,500
H-9B	November 1985	Cul	590	37	146	7	1900	194
H-2A	April 1986	Cul	743	167	3570	94	2980	5310
P-17	March 1986	Cul	1620	1460	28,300	782	6020	48,200
WIPP-29	December 1985	Cul	413	6500	94,900	23,300	20,000	179,000
H-3B1	July 1985	Mag	1000	292	1520	35	2310	3360
H-4C	November 1986	Mag	651	411	7110	85	7100	8460
Ranch	June 1986	DL	420	202	200	4	1100	418

Key to Zone:

R/S = "basal brine aquifer" near the contact between the Rustler and Salado Formations; Cul = Culebra Member, Rustler Formation; DL = Dewey Lake Redbeds.

8 2.4.2 Regional and Local Geochemistry in the Salado Formation

9 The Salado Formation consists dominantly of halite, interrupted at intervals of meters to tens of 10 meters by beds of anhydrite, polyhalite, mudstone, and local potash mineralization (sylvite or 11 langbeinite, with or without accessory carnallite, kieserite, kainite and glauberite, all in a halite 12 matrix). Some uniquely identifiable non-halite units, 0.1 to 10 m thick, have been numbered from 13 the top down (100 to 144) for convenience as marker beds to facilitate cross-basinal 14 stratigraphic correlation. The WIPP facility was excavated just above Marker Bed 139 in the 15 Salado Formation at a depth of about 655 m.

Although the most common Delaware Basin evaporite mineral is halite, the presence of less 16 soluble interbeds (dominantly anhydrite, polyhalite, and claystone) and more soluble admixtures 17 (e.g. sylvite, glauberite, kainite) has resulted in chemical and physical properties significantly 18 different from those of pure NaCI. Under differential stress produced near excavations, brittle 19 interbeds (anhydrite, polyhalite, magnesite, dolomite) may fracture, whereas under a similar 20 stress regime pure NaCl would undergo plastic deformation. Fracturing of these interbeds has 21 locally enhanced the permeability, allowing otherwise nonporous rock to carry groundwater 22 (e.g., the fractured polyhalitic anhydrite of Marker Bed 139 under the floor of the WIPP 23 excavations). 24

Groundwater in evaporites represents the exposure of chemical precipitates to fluids that may be agents (as in the case of dissolution) or consequences of postdepositional alteration of the

- evaporites (as in the cases of dehydration of gypsum and diagenetic dewatering of other
- 2 minerals). Early in the geological studies of the WIPP site, groundwater occurrences that could
- 3 be hydrologically characterized were identified.
- 4 Since the beginning of conventional mining in the Delaware Basin, relatively short-lived seeps
- 5 (pools on the floor, efflorescences on the walls, and stalactitic deposits on the ceiling) have
- ⁶ been known to occur in the Salado Formation where excavations have penetrated. These brine
- 7 occurrences are commonly associated with the non-halitic interbeds whose porosity is governed
- 8 either by fracturing (as in brittle beds) or mineralogical discontinuities (as in "clay" seams).
- 9 The geochemistry of brines encountered in the Salado Formation is summarized in Table G2-6.
- 10 The relative abundance of minerals was summarized in Table G2-4.

11

Table G2-6 Variations in Major Solutes in Brines from the Salado Formation, in mg/L (after Lambert, 1992)

Source of Brine	Date	Ca	Mg	К	Na	CI	SO ₄
Room G Seep	Sep-87	278	14800	15800	99000	188000	29500
	Nov-87	300	18700	15400	97100	190000	32000
	Feb-88	260	18200	17100	94100	186000	36200
	Mar-88	280	17000	16200	92100	187000	34800
	Jul-88	292	13000	14800	96600	188000	29300
	Sep-88	273	14700	13700	86500	185000	28000
	Apr-91	240	14400	12900	95000	189000	28000
	Jul-91	239	14100	13100	93000	190000	27700
	Oct-91	252	14700	14100	95000	189000	27100
Marker Bed 139		300	18900	14800	67700	155900	14700
(under repository)		300	17100	15600	72700	158900	13400
		300	17600	15800	71600	182200	14700
Room J		230	17700	13500	63600	167000	15100
		210	27400	22400	56400	168000	19600
		220	17900	15600	73400	165000	9300
		250	22200	18300	63000	165000	31100
		190	31000	19900	46800	170000	24600
		100	35400	27800	40200	173000	30000
		270	18900	14500	59900	166000	16200
		280	20200	17000	70400	165000	10600
Room Q		279	31500	22600	68000	205000	19400
		288	31100	24100	68000	203000	19200
		257	34000	26300	63000	205000	23500
AIS Sump	Jul-88	960	1040	1720	118000	187000	6170
(accumulation in bottom of sump)	May-89	900	500	600	83100	122700	7700
······································	May-89	1000	800	1100	82400	114200	8800
McNutt Potash Zone							
Duval mine		640	55400	30000	27500	236500	3650
Miss. Chem. mine		200	44200	45800	43600	226200	12050

1 3. Design Guidance

2 3.1 Introduction

The WIPP is subject to regulatory requirements contained in applicable portions of the New 3 Mexico Hazardous Waste Act, specifically 20.4.1.500 NMAC and .900 (incorporating 40 CFR 4 §264 and §270), and requirements contained in 40 CFR §191 and 40 CFR §194. The use of 5 both engineered and natural barriers to isolate wastes from the accessible environment is 6 required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR 7 §191.14(d). The use of engineered barriers to prevent or substantially delay the movement of 8 water, hazardous constituents, or radionuclides toward the accessible environment is required 9 by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR §194.44. 10 Hazardous constituent release performance standards are specified in Permit Part 5 and 11 20.4.1.500 NMAC (incorporating 40 CFR §§264.111(b), 264.601(a), and 264 Subpart F). 12 Quantitative requirements for potential releases of radioactive materials from the repository 13 system are specified in 40 CFR §191. The regulations impose quantitative release requirements 14 on the total repository system, not on individual subsystems of the repository system, for 15 example, the shaft sealing subsystem. 16

3.2 Design Guidance and Design Approach

The guidance described for the design of the shaft sealing system addresses the need for the WIPP to comply with system requirements and to follow accepted engineering practices using demonstrated technology. The design guidance addresses the need to limit:

- 1. radiological or other hazardous constituents reaching the regulatory boundaries,
- 22 2. groundwater flow into and through the sealing system,
- 23 3. chemical and mechanical incompatibility,
- 24 4. structural failure of system components,
- 5. subsidence and accidental entry, and
- 6. development of new construction technologies and/or materials.
- For each element of design guidance, a design approach has been developed. Table G2-7
- contains qualitative design guidance and the design approach used to implement it.
- 29

 Table G2-7

 Shaft Sealing System Design Guidance

	Qualitative Design Guidance		Design Approach
	The shaft sealing system shall limit:		The shaft sealing system shall be designed to meet the qualitative design guidance in the following ways:
1.	the migration of radiological or other hazardous constituents from the repository horizon to the regulatory boundary during the 10,000-year regulatory period following closure;	1.	In the absence of human intrusion, brine migrating from the repository horizon to the Rustler Formation must pass through a low permeability sealing system.
2.	groundwater flowing into and through the shaft sealing system;	2.	In the absence of human intrusion, groundwater migrating from the Rustler Formation to the repository horizon must pass through a low permeability sealing system.
3.	chemical and mechanical incompatibility of seal materials with the seal environment;	3.	Brine contact with seal elements is limited and materials possess acceptable mechanical properties.
4.	the possibility for structural failure of individual components of the sealing system;	4.	State of stress from forces expected from rock creep and other mechanical loads is favorable for seal materials.
5.	subsidence of the ground surface in the vicinity of the shafts and the possibility of accidental entry after sealing;	5.	The shaft is completely filled with low-porosity materials, and construction equipment would be needed to gain entry.
6.	the need to develop new technologies or materials for construction of the shaft sealing system.	6.	Construction of the shaft sealing system is feasible using available technologies and materials.

1 4. Design Description

2 4.1 Introduction

8

9

10

The design presented in this section was developed based on (1) the design guidance outlined in Section 3.0, (2) past design experience, and (3) a desire to reduce uncertainties associated with the performance of the WIPP sealing system. The WIPP shaft sealing system design has evolved over the past decade from the initial concepts presented by Stormont (1984) to the design concepts presented in this document. The past designs are:

- the plugging and sealing program for the WIPP (Stormont, 1984),
 - the initial reference seal system design (Nowak et al., 1990),
- the seal design alternative study (Van Sambeek et al., 1993),
- the WIPP sealing system design (DOE, 1995).

The present design changes were implemented to take advantage of knowledge gained from 12 small-scale seals tests conducted at the WIPP (Knowles and Howard, 1996), advances in the 13 ability to predict the time-dependent mechanical behavior of compacted salt rock (Callahan et 14 al., 1996), large-scale dynamic salt compaction tests and associated laboratory determination of 15 the permeability of compacted salt samples (Hansen and Ahrens, 1996; Brodsky et al., 1996), 16 field tests to measure the permeability of the DRZ surrounding the WIPP AIS (Dale and 17 Hurtado, 1996), and around seals (Knowles et al., 1996). A summary paper (Hansen et al., 18 1996) describing the design has been prepared. 19

The shaft sealing system is composed of seals within the Salado Formation, the Rustler 20 Formation, and the Dewey Lake Redbeds and overlying units. All components of the sealing 21 system are designed to meet Items 3, 4, and 6 of the Design Guidance (Table G2-7.); that is, all 22 sealing system components are designed to be chemically and mechanically compatible with 23 the seal environment, structurally adequate, and constructable using currently available 24 technology and materials. The seals in the Salado Formation are also designed to meet Items 1 25 and 2 of the Design Guidance. These seals will limit fluid migration upward from the repository 26 to the Rustler Formation and downward from the Rustler Formation to the repository. Migration 27 of brine upward and downward is discussed in Sections 8.5 and 8.4 respectively. The seals in 28 the Rustler Formation are designed to meet Item 2 in addition to Items 3, 4, and 6 of the Design 29 Guidance. The seals in the Rustler Formation limit migration of Rustler brines into the shaft 30 cross-section and also limit cross-flow between the Culebra and Magenta members. The 31 principal function of the seals in the Dewey Lake Redbeds and overlying units is to meet Item 5 32 of the Design Guidance, that is, to limit subsidence of the ground surface in the vicinity of the 33 shafts and to prevent accidental entry after repository closure. Entry of water (surface water and 34 any groundwater that might be present in the Dewey Lake Redbeds and overlying units) into the 35 sealing system is limited by restraining subsidence and by placing high density fill in the shafts. 36

37 4.2 Existing Shafts

The WIPP underground facilities are accessed by four shafts commonly referred to as the Waste, Air Intake, Exhaust, and Salt Handling Shafts. These shafts were constructed between 1981 and 1988. All four shafts are lined from the surface to just below the contact of the Rustler and Salado Formations. The lined portion of the shafts terminates in a substantial concrete structure called the "key," which is located in the uppermost portion of the Salado Formation. 1 Drawings showing the configuration of the existing shafts are included in Appendix G2-E and

listed below in Table G2-8. Table G2-9 contains a summary of information describing the
 existing shafts.

The upper portions of the WIPP shafts are lined. The Waste, Air Intake, and Exhaust shafts 4 have concrete linings; the Salt Handling Shaft has a steel lining with grout backing. In addition, 5 during shaft construction, steel liner plates, wire mesh, and pressure grouting were used to 6 stabilize portions of the shaft walls in the Rustler Formation and overlying units. Seepage of 7 groundwater into the lined portions of the shafts has been observed. This seepage was 8 expected; in fact, the shaft keys (massive concrete structures located at the base of each shaft 9 liner) were designed to collect the seepage and transport it through a piping system to collection 10 points at the repository horizon. In general, the seepage originates in the Magenta and Culebra 11 members of the Rustler Formation and in the interface zone between the Rustler and Salado 12 formations. It flows along the interface between the shaft liner and the shaft wall and through the 13 DRZ immediately adjacent to the shaft wall. In those cases where seepage through the liner 14 occurred, it happened where the liner offered lower resistance to flow than the interface and 15 DRZ, for example, at construction joints. Maintenance grouting, in selected areas of the WIPP 16 shafts, has been utilized to reduce seepage. 17

18 19

Table G2-8 Drawings Showing Configuration of Existing WIPP Shafts (Drawings are in Appendix G2-E)

Shaft	Drawing Title	Sheet Number of Drawing SNL-007
Waste	Near-Surface/Rustler Formation Waste Shaft Stratigraphy & As-Built Elements	2 of 28
Waste	Salado Formation Waste Shaft Stratigraphy & As-Built Elements	3 of 28
AIS	Near-Surface/Rustler Formation Air Intake Shaft Stratigraphy & As- Built Elements	7 of 28
AIS	AIS Salado Formation Air Intake Shaft Stratigraphy & As-Built Elements	
Exhaust	Near-Surface/Rustler Formation Exhaust Shaft Stratigraphy & As-Built Elements	12 of 28
Exhaust	Salado Formation Exhaust Shaft Stratigraphy & As-Built Elements	13 of 28
Salt Handling	Near-Surface/Rustler Formation Salt Handling Shaft Stratigraphy & As-Built Elements	17 of 28
Salt Handling	Salado Formation Salt Handling Shaft Stratigraphy & As-Built Elements	18 of 28

Table G2-9
Summary of Information Describing Existing WIPP Shafts

		Shafts			
		Salt Handling	Waste	Air Intake	Exhaust
Α.	Construction Method				
i.	Sinking method	Blind bored	Initial 6' pilot hole slashed by drill & blast (smooth wall blasting)	Raise bored	Initial 6' pilot hole slashed by drill & blast (smooth wall blasting)
ii.	Dates of shaft sinking	7/81-10/81	Drilled 12/81-2/82 Slashed 10/83-6/84	12/87-8/88	9/83-11/84
iii.	Ground treatment in water-bearing zone	Grout behind steel liner during construction	Grouted 1984 & 1988	Grouted 1993	Grouted 1985, 1986, & 1987
iv.	Sump construction	Drill & blast	Drill & blast	No sump	No sump
В.	Upper Portion of Shaft *				
i.	Type of liner	Steel	Concrete	Concrete	Concrete
ii.	Lining diameter (ID)	10'-0"	19'-0"	18'-0"/16'-7"	14'-0"
iii.	Excavated diameter	11'-10″	20'-8" to 22'-4"	20'-3"	15'-8" to 16'-8"
iv.	Installed depth of liner	838.5′	812'	816′	846′
C.	Key Portion of Shaft *				
i.	Construction material	Reinf. conc. w/chem. seals	Reinf. concrete w/chem. seals	Reinf. concrete w/chem. seals	Reinf. concrete w/chem. seals
ii.	Liner diameter (ID)	10'-0″	19'-0"	16'-7"	14'-0"
iii.	Excavated diameter	15'-0" to 18'-0"	27'-6" to 31'-0"	29'-3" to 35'-3"	21'-0" to 26'-0"
iv.	Depth-top of Key	844'	836′	834′	846′
v.	Depth-bottom of Key	883'	900′	897′	910′
vi.	Dow Seal #1 depth	846' to 848'	846' to 849'	839' to 842'	853' to 856'
vii.	Dow Seal #2 depth	853' to 856'	856' to 859'	854' to 857'	867' to 870'
viii.	Dow Seal #3 depth	868 to 891'	NA	NA	NA
ix.	Top of salt (Rustler/Salado contact)	851'	843'	841′	853'

		Shafts			
		Salt Handling	Waste	Air Intake	Exhaust
D.	Lower Shaft (Unlined) *				
i.	Type of support	Unlined	Chain link mesh	Unlined	Chain link mesh
ii.	Excavated diameter	11'-10″	20'-0"	20'-3"	15'-0"
iii.	Depth-top of "unlined"	882′	900'	904'	913′
iv.	Depth-bottom of "unlined"	2144′	2142'	2128′	2148′
E.	Station *				
i.	Type of support	Wire mesh		Wire mesh	Wire mesh
ii.	Principal dimensions	21H × 31W	12H × 30W	25H × 36W	12H × 23W
iii.	Depth-top of station	2144′	2142'	2128′	2148′
iv.	Depth-floor of station	2162'	2160′	2150'	2160′
F.	Sump *				
De	pth-top of sump	2162'	2160′	No sump	No sump
De	pth-bottom of sump	2272'	2286′		
G.	<u>Shaft Duty</u>	Construction hoisting of excavated salt; personnel hoisting; for intake (fresh) air; in some cases, unfiltered exhaust shaft to ventilate areas of the underground that do not need filtration	Hoisting shaft for lowering waste containers; personnel hoisting until waste receipt	Ventilation shaft for intake (fresh) air; personnel hoisting	Exhaust air ventilation shaft

*This information is from the MOC drawings identified on Sheets 2, 3, 7, 8, 12, 13, 17, and 18 of Drawing SNL-007 (see Appendix G2-E).

1 4.3 Sealing System Design Description

This section describes the shaft sealing system design, components, and functions. The shaft
 sealing system consists of three essentially independent parts:

- The seals in the Salado Formation provide the primary regulatory barrier. They will
 limit fluid flow into and out of the repository throughout the 10,000-year regulatory
 period.
- 7
 2. The seals in the Rustler Formation will limit flow from the water-bearing members of
 8
 8
 8
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 9
 <
- 3. The seals in the Dewey Lake Redbeds and the near-surface units will limit infiltration of
 surface water and preclude accidental entry through the shaft openings.

The same sealing system is used in all four shafts. Therefore an understanding of the sealing system for one shaft is sufficient to understand the sealing system in all shafts. Only minor differences exist in the lengths of the components, and the component diameters differ to accommodate the existing shaft diameters.

The shaft liner will be removed in four locations in each shaft. All of these locations are within the Rustler Formation. Additionally, the upper portion of each shaft key will be eliminated. The portion of the shaft key that will be eliminated spans the Rustler/Salado interface and extends into the Salado Formation. The shaft liner removal locations are

- 19 1. from 10 ft above the Magenta Member to the base of the Magenta (removal distances 20 vary from 34–39 ft because of different member thickness at shaft locations),
- 2. for a distance of 10 ft in the anhydrite of the Tamarisk Member,
- 22 3. through the full height of the Culebra (17–24 ft), and
- 4. from the top anhydrite unit in the unnamed lower member to the top of the key (67– 85 ft).

Additionally, the concrete will be removed from the top of the key to the bottom of the key's lower chemical seal ring (23 to 29 ft). Drawing SNL-007, Sheets 4, 9, 14, and 19 in Appendix G2-E show shaft liner removal plans, and Sheet 23 shows key removal plans.

The decision to abandon portions of the shaft lining and key in place is based on two factors. First, no improvements in the performance of the sealing system associated with removal of these isolated sections of concrete have been identified. Second, because the keys are thick and heavily reinforced, their removal would be costly and time consuming. No technical problems are associated with the removal of this concrete; thus, if necessary, its removal can be incorporated in any future design.

The DRZ will be pressure grouted throughout the liner and key removal areas and for a distance of 10 ft above and below all liner removal areas. The pressure grouting will stabilize the DRZ during liner removal and shaft sealing operations. The grouting will also control groundwater seepage during and after liner removal. The pressure grouting of the DRZ has not been 1 assigned a sealing function beyond the construction period. It is likely that this grout will seal the

2 DRZ for an extended period of time. However, past experience with grout in the mining and

3 tunneling industries demonstrates that groundwater eventually opens alternative pathways

4 through the media and reestablishes seepage patterns (maintenance grouting is common in

5 both mines and tunnels). Therefore, post-closure sealing of the DRZ in the Rustler Formation

6 has not been assumed in the design.

7 The compacted clay sealing material (bentonite) will seal the shaft cross-section in the Rustler Formation. In those areas where the shaft liner has been removed, the compacted clay will 8 confine the vertical movement of groundwater in the Rustler to the DRZ. Sealing the shaft DRZ 9 is accomplished in the Salado Formation. It is achieved initially through the interruption of the 10 halite DRZ by concrete-asphalt waterstops and on a long-term basis through the natural 11 process of healing the halite DRZ. The properties of the compacted clay are discussed in 12 Section 5.3.2. The concrete-asphalt waterstops and DRZ healing in the Salado are discussed in 13 Sections 7.6.1 and 7.5.2 respectively. 14

Reduction of the uncertainty associated with long-term performance is addressed by replacing
 the upper and lower Salado Formation salt columns used in some of the earlier designs with
 compacted clay columns and by adding asphalt sealing components in the Salado Formation.

18 Use of disparate materials for sealing components reduces the uncertainty associated with a

19 common-mode failure.

20 The compacted salt column provides a seal with an initial permeability several orders of

21 magnitude higher than the clay or asphalt columns; however, its long-term properties will

approach those of the host rock. The permeability of the compacted salt, after consolidation, will

be several orders of magnitude lower than that of the clay and comparable to that of the asphalt.

The clay provides seals of known low permeability at emplacement, and asphalt provides an

independent low permeability seal of the shaft cross-section and the shaft wall interface at the

time of installation. Sealing of the DRZ in the Rustler Formation during the construction period is

accomplished by grouting, and initial sealing of the DRZ in the Salado Formation is

accomplished by three concrete-asphalt waterstops.

In the following sections, each component of each of the three shaft segments is identified by

name and component number (see Figure G2-5 for nomenclature). Associated drawings in

Appendix G2-E are also identified. Drawings showing the overall system configurations for each

³² shaft are listed in Table G2-10.

33 4.3.1 Salado Seals

The seals placed in the Salado Formation are composed of (1) consolidated salt, clay, and asphalt components that will function for very long periods, exceeding the 10,000-year

regulatory period; and (2) salt saturated concrete components that will function for extended

periods. The specific components that comprise the Salado seals are described below.

38 4.3.1.1 Compacted Salt Column

The compacted salt column (Component 10 in Figure G2-5, and shown in Drawing SNL-007,

40 Sheet 25) will be constructed of crushed salt taken from the Salado Formation. The length of the

salt column varies from 170 to 172 m (556 to 564 ft) in the four shafts. The compacted salt

column is sized to allow the column and concrete-asphalt waterstops at either end to be placed

between the Vaca Triste Unit and Marker Bed 136. The salt will be placed and compacted to a
 density approaching 90% of the average density of intact Salado salt. The effects of creep

3 closure will cause this density to increase with time, further reducing permeability.

4 The salt column will offer limited resistance to fluid migration immediately after emplacement,

5 but it will become less permeable as creep closure further compacts the salt. Salt creep

6 increases rapidly with depth; therefore, at any time, creep closure of the shaft will be greater at

7 greater depth. The location and initial compaction density of the compacted salt column were

8 chosen to assure consolidation of the compacted salt column in the 100 years following

9 repository closure. The state of salt consolidation, results of analyses predicting the creep

10 closure of the shaft, consolidation and healing of the compacted salt, and healing of the DRZ

surrounding the compacted salt column are presented in Sections 7.5 and 8.4 of this document.
 These results indicate that the salt column will become an effective long-term barrier within 100

- 13 **vears**.
- 14 15

Table G2-10 Drawings Showing the Sealing System for Each Shaft (Drawings are in Appendix G2-E)

Shaft	Drawing Title	Sheet Number of Drawing SNL 007
Waste	Near-Surface/Rustler Formation Waste Shaft Stratigraphy & Sealing Subsystem Profile	4 of 28
Waste	Salado Formation Waste Shaft Stratigraphy & Sealing Subsystem Profile	5 of 28
AIS	Near-Surface/Rustler Formation Air Intake Shaft Stratigraphy & Sealing Subsystem Profile	9 of 28
AIS	Salado Formation Air Intake Shaft Stratigraphy & Sealing Subsystem Profile	10 of 28
Exhaust	Near-Surface/Rustler Formation Exhaust Shaft Stratigraphy & Sealing Subsystem Profile	14 of 28
Exhaust	Salado Formation Exhaust Shaft Stratigraphy & Sealing Subsystem Profile	15 of 28
Salt Handling	Near-Surface/Rustler Formation Salt Handling Shaft Stratigraphy & Sealing Subsystem Profile	19 of 28
Salt Handling	Salado Formation Salt Handling Shaft Stratigraphy & Sealing Subsystem Profile	20 of 28

16 4.3.1.2 Upper and Lower Salado Compacted Clay Columns

The upper and lower Salado compacted clay columns (Components 8 and 12 respectively in 17 Figure G2-5) are shown in detail on Drawing SNL-007, Sheet 24. A commercial well-sealing 18 grade sodium bentonite will be used to construct the upper and lower Salado clay columns. 19 These clay columns will effectively limit fluid movement from the time they are placed and will 20 provide an effective barrier to fluid migration throughout the 10,000-year regulatory period and 21 thereafter. The upper clay column ranges in length from 102 to 107 m (335 to 351 ft), and the 22 lower clay column ranges in length from 29 to 33 m (94 to 107 ft) in the four shafts. The 23 locations for the upper and lower clay columns were selected based on the need to limit fluid 24 migration into the compacting salt column. The lower clay column stiffness is sufficient to 25

1 promote early healing of the DRZ, thus removing the DRZ as a potential pathway for fluids

2 (Appendix D in the Compliance Submittal Design Report (Sandia, 1996), Section 5.2.1).

3 4.3.1.3 Upper, Middle, and Lower Concrete-Asphalt Waterstops

The upper, middle, and lower concrete-asphalt waterstops (Components 7, 9, and 11 respectively in Figure G2-5) are identical and are composed of three elements: an upper concrete plug, a central asphalt waterstop, and a lower concrete plug. These components are also shown on Drawing SNL-007, Sheet 22. The concrete specified is a specially developed salt-saturated concrete called Salado Mass Concrete (**SMC**). In all cases the component's overall design length is 15 m (50 ft).

The upper and lower concrete plugs of the concrete-asphalt waterstop are identical. They fill the shaft cross-section and have a design length of 7 m (23 ft). The plugs are keyed into the shaft wall to provide positive support for the plug and overlying sealing materials. The interface between the concrete plugs and the surrounding formation will be pressure grouted. The upper plug in each component will support dynamic compaction of the overlying sealing material if compaction is specified. Dynamic compaction of the salt column is discussed in Section 6.

The asphalt waterstop is located between the upper and lower concrete plugs. In all cases a 16 kerf extending one shaft radius beyond the shaft wall is cut in the surrounding salt to contain the 17 waterstop. The kerf is 0.3 m (1 ft) high at its edge and 0.6 m (2 ft) high at the shaft wall. The 18 kerf, which cuts through the existing shaft DRZ, will result in the formation of a new DRZ along 19 its perimeter. This new DRZ will heal shortly after construction of the waterstop, and thereafter 20 the waterstop will provide a very low permeability barrier to fluid migration through the DRZ. The 21 formation and healing of the DRZ around the waterstop are addressed in Section 7.6.1. The 22 asphalt fill for the waterstop extends two feet above the top of the kerf to assure complete filling 23 of the kerf. The construction procedure used assures that shrinkage of the asphalt from cooling 24 will not result in the creation of voids within the kerf and will minimize the size of any void below 25 the upper plug. 26

Concrete-asphalt waterstops are placed at the top of the upper clay column, the top of the compacted salt column, and the top of the lower clay column. The concrete-asphalt waterstops provide independent seals of the shaft cross-section and the DRZ. The SMC plugs (and grout) will fill irregularities in the shaft wall, bond to the shaft wall, and seal the interface. Salt creep against the rigid concrete components will place a compressive load on the salt and promote early healing of the salt DRZ surrounding the SMC plugs. The asphalt waterstop will seal the shaft cross-section and the DRZ.

The position of the concrete components was first determined by the location of the salt and clay columns. The components were then moved upward or downward from their initial design location to assure the components were located in regions where halite was predominant. This positioning, coupled with variations in stratigraphy, is responsible for the variations in the lengths of the salt and clay columns.

39 4.3.1.4 Asphalt Column

An asphalt-aggregate mixture is specified for the asphalt column (Component 6 in Figure G2-5). This column is 42 to 44 m (138 to 143 ft) in length in the four shafts, as shown in Drawing SNL-007, Sheet 23. The asphalt column is located above the upper concrete-asphalt waterstop; it 1 extends approximately 5 m (16 ft) above the Rustler/Salado interface. A 6-m (20-ft) long

2 concrete plug (part of the Rustler seals) is located just above the asphalt column.

The existing shaft linings will be removed from a point well above the top of the asphalt column to the top of the shaft keys. The concrete shaft keys will be removed to a point just below the lowest chemical seal ring in each key. The asphalt column is located at the top of the Salado Formation and provides an essentially impermeable seal for the shaft cross section and along the shaft wall interface. The length of the asphalt column will decrease slightly as the column cools. The procedure for placing the flowable asphalt-aggregate mixture is described in Section 6.

10 4.3.1.5 Shaft Station Monolith

A shaft station monolith (Component 13) is located at the base of the each shaft. Because the configurations of each shaft differ, drawings of the shaft station monoliths for each shaft were prepared. These drawings are identified in Table G2-11. The shaft station monoliths will be constructed with SMC. The monoliths function to support the shaft wall and adjacent drift roof, thus preventing damage to the seal system as the access drift closes from natural processes.

16 17

Table G2-11 Drawings Showing the Shaft Station Monoliths (Drawings are in Appendix G2-E)

Shaft	Drawing Title	Sheet Number of Drawing SNL-007
Waste	Waste Shaft Shaft Station Monolith	6 of 28
AIS	Air Intake Shaft Shaft Station Monolith	11 of 28
Exhaust	Exhaust Shaft Shaft Station Monolith	16 of 28
Salt Handling	Salt Handling Shaft Shaft Station Monolith	21 of 28

18 **4.3.2 Rustler Seals**

The seals in the Rustler Formation are composed of the Rustler compacted clay column and a concrete plug. The concrete plug rests on top of the asphalt column of the Salado seals. The clay column extends from the concrete plug through most of the Rustler Formation and terminates above the Rustler's highest water-bearing zone in the Forty-niner Member.

23 4.3.2.1 Rustler Compacted Clay Column

The Rustler compacted clay column (Component 4 in Figure G2-5) is shown on Drawing SNL-007, Sheet 27 for each of the four shafts. A commercial well-sealing-grade sodium bentonite will be used to construct the Rustler clay column, which will effectively limit fluid movement from the time of placement and provide an effective barrier to fluid migration throughout the 10,000-year regulatory period and thereafter. Design length of the Rustler clay column is about 71 m (234 to 235 ft) in the four shafts.

The location for the Rustler clay columns was selected to limit fluid migration into the shaft cross-section and along the shaft wall interface and to limit mixing of Culebra and Magenta waters. The clay column extends from above the Magenta Member to below the Culebra 1 Member of the Rustler Formation. The Magenta and Culebra are the water-bearing units of the 2 Rustler. The members above the Magenta (the Forty-niner), between the Magenta and Culebra

3 (the Tamarisk), and below the Culebra (the unnamed lower member) are aquitards in the vicinity

4 of the WIPP shafts.

5 4.3.2.2 Rustler Concrete Plug

The Rustler concrete plug (Component 5 in Figure G2-5) is constructed of SMC. The plugs for 6 the four shafts are shown on Drawing SNL-007, Sheet 26. The plug is 6 m (20 ft) long and will 7 fill the shaft cross-section. The plug is placed directly on top of the asphalt column of the Salado 8 seals. The plug will be keyed into the surrounding rock and grouted. The plug permits work to 9 begin on the overlying clay column before the asphalt has completely cooled. The option of 10 constructing the overlying clay columns using dynamic compaction (present planning calls for 11 construction using compressed clay blocks) is also maintained by keying the plug into the 12 surrounding rock. 13

14 4.3.3 Near-Surface Seals

The near-surface region is composed of dune sand, the Mescalero caliche, the Gatuña 15 Formation, the Santa Rosa Formation, and the Dewey Lake Redbeds. This region extends from 16 the ground surface to the top of the Rustler Formation-a distance of about 160 m (525 ft). All 17 but about 15 m (50 ft) of this distance is composed of the Dewey Lake Redbeds Formation. The 18 near-surface seals are composed of two earthen fill columns and a concrete plug. The upper 19 earthen fill column (Component 1) extends from the shaft collar through the surficial deposits 20 downward to the top of the Dewey Lake Redbeds. The concrete plug (Component 2) is placed 21 in the top portion of the Dewey Lake Redbeds, and the lower earthen fill column (Component 3) 22 extends from the concrete plug into the Rustler Formation. These components are shown on 23 Drawing SNL-007, Sheet 28. 24

This seal will limit the amount of surface water entering the shafts and will limit the potential for any future groundwater migration into the shafts. The near surface seals will also completely close the shafts and prevent accidental entry and excessive subsidence in the vicinity of the shafts. As discussed in Section 4.3.2, the existing shaft linings will be abandoned in place throughout the near-surface region.

30 4.3.3.1 Near-Surface Upper Compacted Earthen Fill

This component (Component 1 in Figure G2-5) will be constructed using locally available fill. The fill will be compacted to a density near that of the surrounding material to inhibit the migration of surface waters into the shaft cross-section. The length of this column varies from 17 to 28 m (56 to 92 ft) in the four shafts. In all cases, this portion of the WIPP sealing system may be modified as required to facilitate decommissioning of the WIPP surface facilities.

36 4.3.3.2 Near-Surface Concrete Plug

Current plans call for an SMC plug (Component 2 in Figure G2-5). However, freshwater
 concrete may be used if found to be desirable at a future time, and if approved by NMED
 through the Permit modification process specified in 20.4.1.900 NMAC (incorporating 40 CFR
 §270.42). The plug extends 12 m (40 ft) downward from the top of the Dewey Lake Redbeds. It
 is placed inside the existing shaft lining, and the interface is grouted.

1 4.3.3.3 Near-Surface Lower Compacted Earthen Fill

2 This component (Component 3 in Figure G2-5) will be constructed using locally available fill,

3 which will be placed using dynamic compaction (the same method used to construct the salt

4 column). The fill will be compacted to a density equal to or greater than the surrounding

5 materials to inhibit the migration of surface waters into the shaft cross-section. The length of this

6 column varies from 136 to 148 m (447 to 486 ft) in the four shafts.

1 5. Material Specification

2 Appendix G2-A provides a body of technical information for each of the WIPP shaft seal

3 materials. The materials specification characterizes each seal material, establishes the

a adequacy of its function, states briefly the method of component placement, and quantifies

5 expected characteristics (particularly permeability) pertinent to a WIPP-specific shaft seal

6 design. The goal of the materials specifications is to substantiate why materials used in this seal

7 system design will limit fluid flow within the shafts and thereby limit releases of hazardous

8 constituents from the WIPP site at the regulatory boundary.

9 This section summarizes materials characteristics for shaft seal system components designed

10 for the WIPP. The shaft seal system will not be constructed for decades; however, if it were to

be constructed in the near term, materials specified could be placed in the shaft and meet

12 performance specifications using current materials and construction techniques. Construction

13 methods are described in Appendix G2-B. Materials specifications and construction

specifications are not to be construed as the only materials or methods that would suffice to seal

the shafts effectively. Undoubtedly, the design will be modified, perhaps simplified, and

16 construction alternatives may prove to be advantageous during the years before seal

construction proceeds. Nonetheless, a materials specification is necessary to establish a frame

of reference for shaft seal design and analysis, to guide construction specifications, and to

19 provide a basis for seal material parameters.

Design detail and other characteristics of the geologic, hydrologic, and chemical setting are 20 provided in the text, appendices, and references. The four shafts will be entirely filled with dense 21 materials possessing low permeability and other desirable engineering and economic attributes. 22 Seal materials include concrete, clay, asphalt, and compacted salt. Other construction and fill 23 materials include cementitious grout and earthen fill. Concrete, clay, and asphalt are common 24 construction materials used extensively in sealing applications. Their descriptions, drawn from 25 literature and site-specific references, are given in Appendix G2-A. Compaction and natural 26 reconsolidation of crushed salt are uniquely applied here. Therefore, crushed salt specification 27 includes discussion of constitutive behavior and sealing performance, specific to WIPP 28 applications. Cementitious grout is also specified in some detail. Only rudimentary discussion of 29 earthen fill is given here and in Appendices A and B. Specifications for each material are 30 discussed in the following order: 31

- functions,
- material characteristics,
- construction,
- performance requirements,
- verification methods.

Seal system components are materials possessing high durability and compatibility with the
 host rock. The system contains functional redundancy and uses differing materials to reduce
 uncertainty in performance. All materials used in the shaft seal system are expected to maintain
 their integrity for very long periods. Some sealing components reduce fluid flow soon after
 placement while other components are designed to function well beyond the regulatory period.

1 5.1 Longevity

A major environmental advantage of the WIPP locale is an overall lack of groundwater to seal 2 against. Even though very little regional water is present in the geologic setting, the seal system 3 reflects great concern for groundwater's potential influence on the shaft seal system. If the 4 hydrologic system sustained considerable fluid flow, brine geochemistry could impact 5 engineered materials. Brine would not chemically change the compacted salt column, but 6 mechanical effects of pore pressure are of concern to reconsolidation. The geochemical setting, 7 as further discussed in Section 2.4, will have little influence on concrete, asphalt, and clay shaft 8 seal materials. Each material is durable because the potential for degradation or alteration is 9 very low. 10

Materials used to form the shaft seals are the same as those identified in the scientific and 11 engineering literature as appropriate for sealing deep geologic repositories for radioactive 12 wastes. Durability or longevity of seal components is a primary concern for any long-term 13 isolation system. Issues of possible degradation have been studied throughout the international 14 community and within waste isolation programs in the USA. Specific degradation studies are not 15 detailed in this document because longevity is one of the over-riding attributes of the materials 16 selected and degradation is not perceived to be likely. However, it is acknowledged here that 17 microbial degradation, seal material interaction, mineral transformation, such as silicification of 18 bentonite, and effects of a thermal pulse from asphalt or hydrating concrete are areas of 19 continuing investigations. 20

Among longevity concerns, degradation of concrete is the most recognized. At this stage of the 21 design, it is established that only small volumes of brine ever reach the concrete elements (see 22 Section C4 of the Compliance Submittal Design Report (Sandia, 1996)). Further analysis 23 concerned with borehole plugging using cementitious materials shows that at least 100 pore 24 volumes of brine in an open system would be needed to begin degradation processes. In a 25 closed system, such as the hydrologic setting in the WIPP shafts, phase transformations create 26 a degradation product of increased volume. Net volume increase owing to phase transformation 27 in the absence of mass transport would decrease rather than increase permeability of concrete 28 seal elements. 29

Asphalt has existed for thousands of years as natural seeps. Longevity studies specific to DOE's Hanford site have utilized asphalt artifacts buried in ancient ceremonies to assess longterm stability (Wing and Gee, 1994). Asphalt used as a seal component deep in the shaft will inhabit a benign environment, devoid of ultraviolet light or an oxidizing atmosphere. Additional assurance against possible microbial degradation in asphalt elements is provided with addition of lime. For these reasons, it is believed that asphalt components will possess their design characteristics well beyond the regulatory period.

Natural bentonite is a stable material that generally will not change significantly over a period of 37 ten thousand years. Bentonitic clays have been widely used in field and laboratory experiments 38 39 concerned with radioactive waste disposal. As noted by Gray (1993), three internal mechanisms, illitization, silicification and charge change, could affect sealing properties of 40 bentonite. Illitization and silicification are thermally driven processes and, following discussion 41 by Gray (1993), are not possible in the environment or time-frame of concern at the WIPP. The 42 naturally occurring Wyoming bentonite which is the specified material for the WIPP shaft seal is 43 well over a million years old. It is, therefore, highly unlikely that the metamorphism of bentonite 44 enters as a design concern. 45

1 5.2 Materials

2 5.2.1 Mass Concrete

Concrete has low permeability and is widely used for hydraulic applications. The specification
 for mass concrete presents a special design mixture of a salt-saturated concrete called Salado
 Mass Concrete (SMC). Performance of SMC and similar salt-saturated mixtures has been
 established through analogous industrial applications and in laboratory and field testing. The
 documentation substantiates adequacy of SMC for concrete applications within the WIPP
 shafts.

The function of the concrete is to provide durable components with small void volume, adequate 9 structural compressive strength, and low permeability. SMC is used as massive plugs, a 10 monolith at the base of each shaft, and in tandem with asphalt waterstops. Concrete is a rigid 11 material that will support overlying seal components while promoting natural healing processes 12 within the salt DRZ. Concrete is one of the redundant components that protects the 13 reconsolidating salt column. The salt column will achieve low permeabilities in fewer than 100 14 years, and concrete will no longer be needed at that time. However, concrete will continue to 15 provide good sealing characteristics for a very long time. 16

Salt-saturated concrete contains sufficient salt as an aggregate to saturate hydration water with 17 respect to NaCl. Salt-saturated concrete is required for all uses within the Salado Formation 18 because fresh water concrete would dissolve part of the host rock. The concrete specified for 19 the shaft seal system has been tailored for the service environment and includes all the 20 engineering properties of high quality concrete, as described in Appendix G2-A. Among these 21 are low heat of hydration, high compressive strength, and low permeability. Because SMC 22 provides material characteristics of high-performance concrete, it will likely be the concrete of 23 choice for all seal applications at the WIPP. 24

25 Construction involves surface preparation and slickline placement. A batching and mixing

operation on the surface will produce a wet mixture having low initial temperatures. Placement

uses a tremie line, where the fresh concrete exits the slickline below the surface level of the

concrete being placed. Placed in this manner, the SMC will have low porosity (about 5%) with or
 without vibration. Tremie line placement is a standard construction method in mining operations.

Specifications of concrete properties include mixture proportions and characteristics before and 30 after hydration. SMC strength is much greater than required for shaft seal elements, and the 31 state of stress within the shafts is compressional with little shear stress developing. Volume 32 stability of the SMC is also excellent; this, combined with salt-saturation, assures a good bond 33 with the salt. Permeability of SMC is very low, consistent with most concrete (Pfeifle et al., 34 1996). Because of a favorable state of stress and isothermal conditions, the SMC will remain 35 intact. Because little brine is available to alter concrete elements, minimal degradation is 36 possible. These favorable attributes combine to assure concrete elements within the Salado will 37 remain structurally sound and possess very low permeability (between 2×10^{-21} and 1×10^{-17} 38

m²) for exceedingly long periods. A permeability distribution function and associated discussion are given in Appendix G2-A.

41 Standard ASTM specifications are made for the green and hydrated concrete properties. Quality 42 control and a history of successful use in both civil construction and mining applications assure

43 proper placement and performance.

1 5.2.2 Compacted Clay

2 Compacted clays are commonly proposed as primary sealing materials for nuclear waste

3 repositories and have been extensively investigated against rigorous performance

4 requirements. Advantages of clays for sealing purposes include low permeability, demonstrated

5 longevity in many types of natural environments, deformability, sorptive capacity, and

6 demonstrated successful utilization in practice for a variety of sealing purposes.

7 Compacted clay as a shaft sealing component functions as a barrier to brine flow and possibly

to gas flow (see alternative construction methods in Appendix G2-B). Compacted bentonitic clay

⁹ can generate swelling pressure and clays have sufficient rigidity to promote healing of any DRZ

in the salt. Wetted swelling clay will seal fractures as it expands into available space and will

ensure tightness between the clay seal component and the shaft walls.

12 The Rustler and Salado compacted clay columns are specified to be constructed of dense

13 sodium bentonite blocks. An extensive experimental data base exists for the permeability of

sodium bentonites under a variety of conditions. Many other properties of sodium bentonite,

such as strength, stiffness, and chemical stability, are established. Bentonitic clays heal when

16 fractured and can penetrate small fractures or irregularities in the host rock. Further, bentonite is

stable in the seal environment. These properties, noted by international waste isolation

18 programs, make bentonite a widely accepted seal material.

From the bottom clay component to the top earthen fill, different methods will be used to place clay materials in the shaft. Seal performance within the Salado Formation is far more important to regulatory compliance of the seal system than is performance of clay and earthen fill in the overlying formations. Therefore, more time and effort will be expended on placement of Salado clay components. Three potential construction methods could be used to place clay in the shaft, as discussed in Appendix G2-B: compacted blocks, vibratory roller, and dynamic compaction. Construction of Salado clay components specifies block assembly.

26 Required sealing performance of compacted clay elements varies with location. For example,

27 Component 4 provides separation of water-bearing zones, while the lowest clay column

(Component 12) limits fluid flow to the reconsolidating salt column. If liquid saturation in the clay

column of 85% can be achieved, it would serve as a gas barrier. In addition, compacted clay

30 seal components promote healing of the salt DRZ. To achieve low permeabilities, the dry 31 density of the emplaced bentonite should be about 1.8 g/cm³. A permeability distribution

function for performance assessment and the logic for its selection are given in Appendix G2-A.

³³ Verification of specified properties such as density, moisture content, permeability, or strength of

compacted clay seals can be determined by direct measurement during construction. However,

indirect methods are preferred because certain measurements, such as permeability, are likely

to be time consuming and invasive. Methods used to verify the quality of emplaced seals will

include quality of block production and field measurements of density.

38 **5.2.3 Asphalt**

Asphalt is used to prevent water migration down the shaft in two ways: as an asphalt column

near the Rustler/Salado contact and as a "waterstop" sandwiched between concrete plugs at

three locations within the Salado Formation. Asphalt components of the WIPP seal design add

assurance that minimal transport of brine down the sealed shaft will occur.

- 1 Asphalt is a widely used construction material because of its many desirable engineering
- 2 properties. Asphalt is a strong cement, readily adhesive, highly waterproof, and durable.
- ³ Furthermore, it is a plastic substance that is readily mixed with mineral aggregates. A range of
- 4 viscosity is achievable for asphalt mixtures. It is highly resistant to most acids, salts, and alkalis.
- 5 These properties are well suited to the requirements of the WIPP shaft seal system.
- 6 Construction of the seal components containing asphalt can be accomplished using a slickline
- 7 process where low-viscosity heated material is effectively pumped into the shaft. The
- 8 technology to apply the asphalt in this manner is available as described in the construction
- 9 procedures in Appendix G2-B.
- 10 The asphalt components are required to endure for about 100 years and limit brine flow down
- the shaft to the compacted salt component. Since asphalt will not be subjected to ultraviolet light
- or an oxidizing environment, it is expected to provide an effective seal for centuries. Air voids
- less than 2% ensure low permeability. The permeability of the massive asphalt column is
- 14 expected to have an upper limit 1×10^{-18} m².
- ¹⁵ Sufficient construction practice and laboratory testing information is available to assure
- 16 performance of the asphalt component. Laboratory validation tests to optimize viscosity may be
- desirable before final installation specifications are prepared. In general, verification tests would
 add quantitative documentation to expected performance values and have direct application to
- 19 WIPP.

20 5.2.4 Compacted Salt Column

- A reconsolidated column of natural WIPP salt will seal the shafts permanently. If salt
- reconsolidation is unimpeded by fluid pore pressures, the material will eventually achieve
- extremely low permeabilities approaching those of the native Salado Formation. Recent
- 24 developments in support of the WIPP shaft seal system have produced confirming experimental
- results, constitutive material models, and construction methods that substantiate use of a salt
- column to create a low permeability seal component. Reuse of salt excavated in the process of
- creating the underground openings has been advocated since its initial proposal in the 1950s.
- Replacing the natural material in its original setting ensures physical, chemical, and mechanical
- compatibility with the host formation.
- The function of the compacted and reconsolidated salt column is to limit transmission of fluids into or out of the repository for the statutory period of 10,000 years. The functional period starts within a hundred years and lasts essentially forever. After a period of consolidation, the salt column will almost completely retard gas or brine migration within the former shaft opening. A completely consolidated salt column will achieve flow properties indistinguishable from natural Salado salt.
- The salt component is composed of crushed Salado salt with additional small amounts of water. The total water content of the crushed salt will be adjusted to 1.5 wt% before it is tamped into place. Field and laboratory tests have verified that natural salt can be compacted to significant
- fractional density ($\rho \ge 0.9$) with addition of these moderate amounts of water.
- ⁴⁰ Dynamic compaction is the specified construction procedure to tamp crushed salt in the shaft.
- Deep dynamic compaction provides great energy to the crushed salt, is easy to apply, and has
- an effective depth of compactive influence greater than lift thickness. Dynamic compaction is

- relatively straightforward and requires a minimal work force in the shaft. Compaction itself will
- ² follow procedures developed in a large-scale compaction demonstration, as outlined in
- 3 Appendix G2-B.

4 Numerical models of the shaft provide density of the compacted salt column as a function of

- 5 depth and time. Many calculations comparing models for consolidation of crushed salt were
- 6 performed to quantify performance of the salt column, as discussed in Appendix D of the
- 7 Compliance Submittal Design Report (Sandia, 1996) and the references (Callahan et al., 1996;
- 8 Brodsky et al., 1996). From the density-permeability relationship of reconsolidating crushed salt,
- 9 permeability of the compacted salt seal component is calculated. In general, results show that 10 the bottom of the salt column consolidates rapidly, achieving permeability of 1×10^{-19} m² in
- the bottom of the salt column consolidates rapidly, achieving permeability of 1×10^{-19} m² in about 50 years. By 100 years, the middle of the salt column reaches similar permeability.
- _
- Results of the large-scale dynamic compaction demonstration suggest that deep dynamic 12 compaction will produce a sufficiently dense starting material. As with other seal components, 13 testing of the material in situ will be difficult and probably not optimal to ensure quality of the 14 seal element. This is particularly apparent for the compacted salt component because the 15 compactive effort produces a finely powdered layer on the top of each lift. It was demonstrated 16 (Hansen and Ahrens, 1996) that the fine powder is very densely compacted upon tamping the 17 superincumbent lifts. The best means to ensure that the crushed salt element is placed properly 18 is to establish performance through verification of quality assurance/quality control procedures. 19 If crushed salt is placed with a reasonable uniformity of water and compacted with sufficient
- If crushed salt is placed with a reasonable uniformity of water and compacted with energy, long-term performance can be assured.

22 **5.2.5 Cementitious Grout**

- Cementitious grouting is specified for all concrete members. Grouting is also used in advance of
 liner removal to stabilize the ground and to limit water inflow during shaft seal construction.
 Cementitious grout is specified because of its proven performance, nontoxicity, and previous
 use at the WIPP.
- The function of grout is to stabilize the surrounding rock before existing concrete liners are removed. Grout will fill fractures within adjacent lithologies, thereby adding strength and reducing permeability and, hence, water inflow during shaft seal construction. Grout around concrete members of the concrete asphalt waterstop will be employed in an attempt to tighten the interface and fill microcracks in the DRZ. Efficacy of grouting will be determined during construction.
- An ultrafine cementitious grout has been specifically developed for use at the WIPP (Ahrens and Onofrei, 1996). This grout consists of Type 5 portland cement, pumice as a pozzolanic material, and superplasticizer. The average particle size is approximately 2 microns. The ultrafine grout is mixed in a colloidal grout mixer, with a water to components ratio (**W:C**) of 0.6:1.
- Drilling and grouting sequences provided in Appendix G2-B follow standard procedures. Grout
 will be mixed on the surface and transported by slickline to the middle deck on the multi-deck
 stage (galloway). Grout pressures are specified below lithostatic to prevent hydrofracturing.

- 1 Performance of grout is not a consideration for compliance issues. Grouting of concrete
- 2 elements is an added assurance to tighten interfaces. Grouting is used to facilitate construction
- 3 by stabilizing any loose rock behind the concrete liner.
- 4 No verification of the effectiveness of grouting is currently specified. If injection around concrete
- 5 plugs is possible, an evaluation of quantities and significance of grouting will be made during
- 6 construction. Procedural specifications will include measurements of fineness and determination
- 7 of rheology in keeping with processes established during the WIPP demonstration grouting
- 8 (Ahrens et al., 1996).

9 5.2.6 Earthen Fill

- 10 A brief description of the earthen fill is provided in Appendix G2-A, and construction is
- summarized in Appendix G2-B. Compacted fill can be obtained from local borrow pits, or
- material excavated during shaft construction can be returned to the shaft. There are minimal
- design requirements for earthen fill and none that are related to WIPP regulatory performance.

14 5.3 Concluding Remarks

- ¹⁵ Materials specifications in Appendix G2-A provide descriptions of seal materials along with
- reasoning on their expected reliability in the WIPP setting. The specification follows a framework
- that states the function of the seal component, a description of the material, and a summary of
- construction techniques. The performance requirements for each material are detailed.
- 19 Materials chosen for use in the shaft seal system have several common desirable attributes: low
- 20 permeability, high density, compatibility, longevity, low cost, constructability, availability, and
- supporting documentation.
- 22

6. Construction Techniques

Construction of the shaft sealing system is feasible. The described procedures utilize currently
available technology, equipment, and materials to satisfy shaft sealing system design guidance.
Although alternative methods are possible, those described satisfy the design guidance
requirements listed in Table G2-7 and detailed in the appendices. Construction feasibility is
established by reference to comparable equipment and activities in the mining, petroleum, and
food industries and test results obtained at the WIPP. Equipment and procedures for
emplacement of sealing materials are described below.

9 6.1 Multi-Deck Stage

A multi-deck stage (Figures G2-6 and G2-7) consisting of three vertically connected decks will 10 be the conveyance utilized during the shaft sealing operation. Detailed sketches of the multi-11 deck stage appear in Appendix G2-E. The stage facilitates installation and removal of utilities 12 and provides a working platform for the various sealing operations. A polar crane attached to 13 the lower deck provides the mechanism required for dynamic compaction and excavation of the 14 shaft walls. Additionally, the header at the bottom of the slickline is supported by a reinforced 15 steel shelf, which is securely bolted to the shaft wall during emplacement of sealing materials. 16 The multi-deck stage can be securely locked in place in the shaft whenever desired (e.g., during 17 dynamic compaction, excavation of the salt walls of the shaft, grouting, liner removal, etc.). The 18 multi-deck stage is equipped with floodlights, remotely aimed closed-circuit television, fold-out 19 floor extensions, a jib crane, and range-finding devices. Similar stages are commonly employed 20 in shaft sinking operations. 21

The polar crane can be configured for dynamic compaction (Figure G2-6) or for excavation of 22 salt (Figure G2-7); a man cage or bucket can be lowered through the stage to the working 23 surface below. Controlled manually or by computer, the crane and its trolley utilize a geared 24 track drive. The crane can swiftly position the tamper (required for dynamic compaction) in the 25 drop positions required (Figure G2-8) or accommodate the undercutter required for excavation 26 of the shaft walls. The crane incorporates a hoist on the trolley and an electromagnet, enabling 27 it to position, hoist, and drop the tamper. A production rate of one drop every two minutes during 28 dynamic compaction is possible. 29

30 6.2 Salado Mass Concrete (Shaft Station Monolith and Shaft Plugs)

Salado Mass Concrete, described in Appendix G2-A, will be mixed on surface at 20°C and transferred to emplacement depth through a slickline (i.e., a steel pipe fastened to the shaft wall and used for the transfer of sealing materials from surface to the fill horizon) minimizing air entrainment and ensuring negligible segregation. Existing sumps will be filled to the elevation of the floor of the repository horizon, and emplacement of the shaft station monolith is designed to eliminate voids at the top (back) of the workings.

When excavating salt for waterstops or plugs in the Salado Formation, an undercutter attached to the trolley of the polar crane will be forced into the shaft wall by a combination of geared trolley and undercutter drives. Full circumferential cuts will be accomplished utilizing the torque developed by the geared polar crane drive.

- 1 The undercutter proposed is a modified version of those currently in use in salt and coal mines,
- 2 where their performance is proven. Such modifications and applications have been judged
- 3 feasible by the manufacturer.

4 The concrete-salt interface and DRZ around concrete plugs in the Salado Formation (and the

5 one at the base of the Rustler Formation) will be grouted with ultrafine grout. Injection holes will

6 be collared in the top of the plug and drilled downward at 45° below horizontal. The holes will be

7 drilled in a "spin" pattern describing a downward opening cone designed to intercept both

vertical and horizontal fractures (Figure G2-9). The holes will be stage grouted (i.e., primary
 holes will be drilled and grouted, one at a time). Secondary holes will then be drilled and

10 grouted, one at a time, on either side of primaries that accepted grout.

6.3 Compacted Clay Columns (Salado and Rustler Formations)

Cubic blocks of sodium bentonite, 20.8 cm on the edge and weighing approximately 18 kg, will 12 be precompacted on surface to a density between 1.8 and 2.0 gm/cm³ and emplaced manually. 13 The blocks will be transferred from surface on the man cage. Block surfaces will be moistened 14 with a fine spray of potable water, and the blocks will be manually placed so that all surfaces are 15 in contact. Peripheral blocks will be trimmed to fit irregularities in the shaft wall, and remaining 16 voids will be filled with a thick mortar of sodium bentonite and potable water. Such blocks have 17 been produced at the WIPP and used in the construction of 0.9-m-diameter seals, where they 18 performed effectively (Knowles and Howard, 1996). Alternatives, which may be considered in 19 future design evaluations, are discussed in Appendix G2-B. 20

6.4 Asphalt Waterstops and Asphaltic Mix Columns

Neat asphalt is selected for the asphalt waterstops, and an asphaltic mastic mix (**AMM**) consisting of neat asphalt, fine silica sand, and hydrated lime will be the sealing material for the columns. Both will be fluid at emplacement temperature and remotely emplaced. Neat asphalt (or AMM, prepared in a pug mill near the shaft collar) will be heated to 180°C and transferred to emplacement depth via an impedance-heated, insulated tremie line (steel pipe) suspended from slips (pipe holding device) at the collar of the shaft.

28 This method of line heating is common practice in the mining and petroleum industries. This method lowers the viscosity of the asphalt so that it can be pumped easily. Remote 29 emplacement by tremie line eliminates safety hazards associated with the high temperature and 30 gas produced by the hot asphalt. Fluidity ensures that the material will flow readily and 31 completely fill the excavations and shaft. Slight vertical shrinkage will result from cooling 32 (calculations in Appendix D of the Compliance Submittal Design Report (Sandia, 1996)), but the 33 material will maintain contact with the shaft walls and the excavation for the waterstop. Vertical 34 shrinkage will be counteracted by the emplacement of additional material. 35

36 6.5 Compacted WIPP Salt

³⁷ Dynamic compaction of mine-run WIPP salt has been demonstrated (Ahrens and Hansen,

1995). The surface demonstration produced salt compacted to 90% of in-place rock salt density,

with a statistically averaged permeability of 1.65×10^{-15} m². Additional laboratory consolidation of

- this material at 5 MPa confining pressure (simulating creep closure of the salt) resulted in
- increased compaction and lower permeability (Brodsky, 1994). Dynamic compaction was

selected because it is simple, robust, proven, has excellent depth of compaction, and is

2 applicable to the vertical WIPP shafts.

The compactive effect expanded laterally and downward in the demonstration, and observation during excavation of the compacted salt revealed that the lateral compactive effect will fill irregularities in the shaft walls. Additionally, the depth of compaction, which was greater than that of the three lifts of salt compacted, resulted in the bottom lift being additionally compacted

7 during compaction of the two overlying lifts. This cumulative effect will occur in the shafts.

8 Construction of the salt column will proceed in the following manner:

Crushed and screened salt will be transferred to the fill elevation via slickline. Use of slicklines is common in the mining industry, where they are used to transfer backfill
 materials or concrete to depths far greater than those required at the WIPP. Potable
 water will be added via a fine spray during emplacement at the fill surface to adjust the moisture content to 1.5 ±0.3 wt%, accomplished by electronically coordinating the
 weight of the water with that of the salt exiting the hose.

Dynamic compaction will then be used to compact the salt by dropping the tamper in specific, pre-selected positions such as those shown in Figure G2-8.

17 6.6 Grouting of Shaft Walls and Removal of Liners

The procedure listed below is a common mining practice which will be followed at each elevation where liner removal is specified. If a steel liner is present, it will be cut into manageable pieces and hoisted to the surface for disposal, prior to initiation of grouting.

Upward opening cones of diamond drill holes will be drilled into the shaft walls in a spin pattern (Figure G2-10) to a depth ensuring complete penetration of the Disturbed Rock Zone (**DRZ**) surrounding the shaft. For safety reasons, no major work will be done from the top deck; all sealing activities will be conducted from the bottom deck. The ends of the holes will be 3 m apart, and the fans will be 3 m apart vertically, covering the interval from 3 m below to 3 m above the interval of liner removal. Tests at the WIPP demonstrated that the ultrafine cementitious grout penetrated more than 2 m from the injection holes(Ahrens et al., 1996).

Injection holes will be drilled and grouted one at a time, as is the practice in stage grouting.
 Primary holes are grouted first, followed by the grouting of secondary holes on either side of
 primaries that accepted grout. Ultrafine grout will be injected below lithostatic pressure to avoid
 hydrofracturing the rock, proceeding from the bottom fan upward. Grout will be mixed on surface
 and transferred to depth via the slickline.

Radial, horizontal holes will then be drilled on a 0.3-m grid, covering the interval to be removed. These will be drilled to a depth sufficient to just penetrate the concrete liner. A chipping hammer will be used to break a hole through the liner at the bottom of the interval. This hole,

approximately 0.3 m in diameter, will serve as "free face," to which the liner can be broken.

Hydraulically-actuated steel wedges will then be used in the pre-drilled holes to break out the

liner in manageable pieces, beginning adjacent to the hole and proceeding upward. Broken concrete will be allowed to fall to the fill surface, where it will be gathered and hoisted to the

surface for disposal. Chemical seal rings will be removed as encountered.

1 6.7 Earthen Fill

Local soil, screened to produce a maximum particle dimension of approximately 15 mm, will be
the seal material. This material will be transferred to the fill surface via the slickline and
emplaced in the same manner as the salt. After adjusting the moisture content of the earthen fill
below the concrete plug in the Dewey Lake Redbeds to achieve maximum compaction, the fill
will be dynamically compacted, achieving a permeability as low as that of the enclosing
formation.

8 The portion of the earthen fill above the plug will be compacted with a vibratory-impact

9 sheepsfoot roller, a vibratory sheepsfoot roller, or a walk-behind vibratory plate compactor,

10 because of insufficient height for dynamic compaction.

11 6.8 Schedule

12 For discussion purposes, it has been assumed that the shafts will be sealed two at a time. This

results in the four shafts being sealed in approximately six and a half years. The schedules

14 presented in Appendix G2-B are based on this logic. Sealing the shafts sequentially would

require approximately eleven and a half years.

7. Structural Analyses of Shaft Seals

2 7.1 Introduction

The shaft seal system was designed in accordance with design guidance described in Section 3 3.2. To be successful, seal system components must exhibit desired structural behavior. The 4 desired structural behavior can be as simple as providing sufficient strength to resist imposed 5 loads. In other cases, structural behavior is critical to achieving desired hydrological properties. 6 For example, permeability of compacted salt depends on the consolidation induced by shaft 7 closure resulting from salt creep. In this example, results from structural analyses feed directly 8 into fluid-flow calculations, which are described in Section 8, because structural behavior affects 9 both time-dependent permeabilities of the compacted salt and pore pressures within the 10 compacted salt. In other structural considerations, thermal effects are analyzed as they affect 11 the constructability and schedule for the seal system. Thus a series of analyses, loosely termed 12 structural analyses, were performed to accomplish three purposes: 13

- to determine loads imposed on components and to assess both structural stability
 based on the strength of the component and mechanical interaction between
 components;
- to estimate the influence of structural behavior of seal materials and surrounding rock
 on hydrological properties; and
- 19 3. to provide structural and thermal related information on construction issues.

For the most part, structural analyses rely on information and design details presented in the
 Design Description (Section 4), the Design Drawings (Appendix G2-E), and Material
 Specification (Section 5 and Appendix G2-A). Some analyses are generic, and calculation input
 and subsequent results are general in nature.

24 7.2 Analysis Methods

Finite-element modeling was the primary numerical modeling technique used to evaluate structural performance of the shaft seals and surrounding rock mass. Well documented finiteelement computer programs, SPECTROM-32 and SPECTROM-41, were used in structural and thermal modeling, respectively. The computer program SALT_SUBSID was used in the subsidence modeling over the backfilled shaft-pillar area. Specific details of these computer programs as they relate to structural calculations are listed in Appendix D of the Compliance Submittal Design Report (Sandia, 1996), Section D2.

32 7.3 Models of Shaft Seals Features

Structural calculations require material models to characterize the behavior of (1) each seal
 material (concrete, crushed salt, compacted clay, and asphalt); (2) the intact rock lithologies in
 the near-surface, Rustler, and Salado formations; and (3) any DRZ within the surrounding rock.
 A general description of the material models used in characterizing each of these materials and
 features is given below. Details of the models and specific values of model parameters are
 given in Appendix D in the Compliance Submittal Design Report (Sandia, 1996), Section D3.

1 7.3.1 Seal Material Models

The SMC thermal properties required for the structural analyses (thermal conductivity, density, specific heat, and volumetric heat generation rate) were obtained from SMC test data. Concrete was assumed to behave as a viscoelastic material, based on experimental data, and the elastic modulus of SMC was modeled as age-dependent. Strength properties of SMC were specified in the design (see Appendix G2-A).

For crushed salt, the deformational model included a nonlinear elastic component and a creep
 consolidation component. The nonlinear elastic modulus was assumed to be density-

9 dependent, based on laboratory test data performed on WIPP crushed salt. Creep consolidation

10 behavior of crushed salt was based on three candidate models whose parameters were

obtained from model fitting to hydrostatic and shear consolidation test data performed on WIPP

12 crushed salt. Creep consolidation models include functional dependencies on density, mean

13 stress, stress difference, temperature, grain size, and moisture content.

Compacted clay was assumed to behave according to a nonlinear elastic model in which shear stiffness is negligible, and asphalt was assumed to behave as a weak elastic material. Thermal

16 properties of asphalt were taken from literature.

17 **7.3.2 Intact Rock Lithologies**

18 Salado salt was assumed to be argillaceous salt that is governed by the Multimechanism

Deformation Coupled Fracture (**MDCF**) model, which is an extension of the Munson-Dawson

20 (**M-D**) creep model. A temperature-dependent thermal conductivity was necessary.

Salado interbeds were assumed to behave elastically. Their material strength was assumed to
 be described by a Drucker-Prager yield function, consistent with values used in previous WIPP
 analyses.

24 Deformational behavior of the near-surface and Rustler Formation rock types was assumed to

25 be time-invariant, and their strength was assumed to be described by a Coulomb criterion,

consistent with literature values.

27 **7.3.3 Disturbed Rock Zone Models**

Two different models were used to evaluate the development and extent of the DRZ within intact salt. The first approach used ratios of time-dependent stress invariants to quantify the potential for damage or healing to occur. The second approach used the damage stress criterion according to the MDCF model for WIPP salt.

32 **7.4** Structural Analyses of Shaft Seal Components

33 7.4.1 Salado Mass Concrete Seals

³⁴ Five analyses related to structural performance of SMC seals were performed, including (1) a

thermal analysis, (2) a structural analysis, (3) a thermal stress analysis, (4) a dynamic

36 compaction analysis, and (5) an analysis of the effects of clay swelling pressure. This section

presents these analyses and evaluates the results in terms of the performance of the SMC seal.

1 Details of these calculations are given in Appendix D in the Compliance Submittal Design

2 Report (Sandia, 1996), Section D4.

3 7.4.1.1 Thermal Analysis of Concrete Seals

4 The objective of this calculation was to determine expected temperatures within (and surrounding) an SMC emplacement resulting from its heat of hydration. Results indicate that the 5 concrete component temperature increases from ambient (27°C) to a maximum of 53°C at 0.02 6 year after emplacement. The maximum temperature in the surrounding salt is 38°C at 7 approximately the same time. The thermal gradient within the concrete is approximately 8 1.5°C/m. Most of the higher temperatures are contained within the concrete. At a radial distance 9 of 2 m into the surrounding salt, the temperature rise is less than 1°C. These conditions are 10 favorable for proper performance of the SMC components. A 26°C temperature rise and a 11 1.5°C/m temperature gradient are not large enough to cause thermal cracking as the concrete 12 cools (Andersen et al., 1992). 13

14 7.4.1.2 Structural Analysis of Concrete Seals

15 The objectives of this calculation were to determine (1) expected stresses within the concrete

components caused by restrained creep of the surrounding salt and (2) expected stresses in the

17 concrete component from weight of overlying seal material.

In the upper concrete-asphalt waterstop, radial stresses increase (compression is positive) from zero at time of emplacement (t = 0) to 2.5 MPa at t = 50 years. Similarly, radial stresses in the middle concrete component range from 3.5 to 4.5 MPa at 50 years after emplacement. In the lower concrete-asphalt waterstop, radial stresses range from 4.5 to 5.5 MPa at t = 50 years. All the calculated stresses are well below the unconfined compressive strength of the concrete (30 MPa).

The upper, middle, and lower concrete-asphalt waterstops are located at depths of 300, 420, and 610 m, respectively. When performing these calculations, it was assumed that each concrete component must support the weight of the overlying materials between it and the next concrete component above it. Using an average overburden density of 0.02 MPa/m, stresses induced by the overlying material are significantly less than the strength of the concrete. The structural integrity of concrete components will not be compromised by either induced radial stress or imposed vertical stress.

- 31 7.4.1.3 Thermal Stress Analysis of Concrete Seals
- 32 The objectives of this calculation were (1) to determine thermal stresses in concrete

components from the heat of hydration and (2) to determine thermal impact on the creep of the surrounding salt.

³⁵ Thermoelastic stresses in the concrete were calculated based on a maximum temperature

increase of 26°C and assuming a fully confined condition. Results of this calculation indicate

that short-term compressive thermal stresses in the concrete will be less than 9.2 MPa. The

temperature rise in the surrounding salt is insignificant in terms of producing either detrimental

or beneficial effects. Based on these results, the structural integrity of concrete components will

40 not be compromised by thermoelastic stresses caused by heat of hydration.

1 7.4.1.4 Effect of Dynamic Compaction on Concrete Seals

The objective of this calculation was to determine a required thickness of seal layers above concrete components to reduce the impact of dynamic compaction. Compaction depths for crushed salt and clay layers are 2.8 m and 2.2 m, respectively. Layers 3.7-m thick for crushed salt and 3-m thick for clay are to be emplaced before compaction begins, thus providing a layer about 30% thicker than the calculated compaction depths.

7 7.4.1.5 Effect of Clay Swelling Pressures on Concrete Seals

The objective of this calculation was to determine the increased stresses within concrete 8 components as a result of clay swelling pressures. Test measurements on confined bentonite at 9 an emplaced density of 1.8 g/cm³ indicate that anticipated swelling pressures are on the order of 10 3.5 MPa. In order to fracture the salt surrounding the clay, the swelling pressures must exceed 11 the lithostatic rock stress in the salt, which ranges from nominally 8.3 MPa at the upper clay seal 12 to 14.4 MPa at the lower clay seal. The design strength of the concrete (31.0 MPa) is 13 significantly greater than the swelling pressure of 3.5 MPa. Even in the unlikely event that the 14 clay swelled to lithostatic pressures, the resulting state of stress in the concrete seal would lie 15 well below any failure surface. Furthermore, the compressive tangential stress in the salt along 16 the shaft wall, even after stress relaxation from creep, is always larger than lithostatic. Hence, 17 radial fracturing from clay swelling pressure is not expected. 18

19 7.4.2 Crushed Salt Seals

Two analyses related to structural performance of crushed salt seals were performed, including (1) a structural analysis and (2) an analysis to determine effects of pore pressure on consolidation of crushed salt seals. This section presents the results of these analyses and evaluates the results in terms of performance of crushed salt seals. Details of these analyses are given in Appendix D in the Compliance Submittal Design Report (Sandia, 1996), Section D4.

26 7.4.2.1 Structural Analysis of Compacted Salt Seal

The objectives of this calculation were (1) to determine the fractional density of the crushed salt seal as a function of time and depth and, using these results, (2) to determine permeability of the crushed salt as a function of time and depth.

Results indicate that compacted salt will increase from its emplaced fractional density of 90% to
 a density of 95% approximately 40, 80, and 120 years after emplacement at the bottom, middle,
 and top of the shaft seal, respectively. Using the modified Sjaardema-Krieg creep consolidation
 model, the times required to fully reconsolidate the crushed salt to 100% fractional density are
 70 years, 140 years, and 325 years at the bottom, middle, and top of the salt column,
 respectively. Based on these results, the desired fractional densities (hence, permeability) can
 be achieved over a substantial length of the compacted salt seal in the range of 50 to 100 years.

7.4.2.2 Pore Pressure Effects on Reconsolidation of Crushed Salt Seals

The objective of this calculation was to determine the effect of pore pressure on the

- reconsolidation of the crushed salt seal. Fractional densities of the crushed salt seal were
- calculated using the modified Sjaardema-Krieg consolidation model for a range of pore

pressures (0, 2, and 4 MPa). Results indicate that times required to consolidate the crushed salt 1 2 increase as the pore pressure increases, as expected. For example, for a pore pressure of 2 MPa, the times required to achieve a fractional density of 96% are about 90 years, 205 years, 3 and 560 years at the bottom, middle, and top of the crushed salt column, respectively. A pore 4 pressure of 4 MPa would effectively prevent reconsolidation of the crushed salt within a 5 reasonable period (<1,000 years). The results of this calculation were used in the fluid flow 6 calculations, and the impact of these pore pressures on the permeability of the crushed salt seal 7 is described in Section 8 and Appendix C of the Compliance Submittal Design Report (Sandia, 8 1996). 9

10 7.4.3 Compacted Clay Seals

One analysis was performed to determine the structural response of compacted clay seals. The 11 objective of this calculation was to determine stresses in the upper Salado compacted clay 12 component and the lower Salado compacted clay component as a result of creep of the 13 surrounding salt. Details of this calculation are given in Appendix D in the Compliance Submittal 14 Design Report (Sandia, 1996), Section D4. Results of this calculation indicate that after 50 15 years the compressive stresses in the upper Salado compacted clay component are about 0.7 16 MPa, not including the effects of swelling pressures. Similarly, after 50 years the stresses in the 17 lower Salado compacted clay component are approximately 2.6 MPa. Based on these results, 18 the compacted clay component will provide some restraint to the creep of salt and induce a 19 back (radial) stress in the clay seal, which will promote healing of the DRZ in the surrounding 20 intact salt (see discussion about DRZ in Section 7.5.1). 21

22 7.4.4 Asphalt Seals

Three analyses were performed related to structural performance of the asphalt seals, including (1) a thermal analysis, (2) a structural analysis, and (3) a shrinkage analysis. This section presents the results of these analyses and evaluates the results in terms of the performance of the asphalt seal. Details of these analyses are given in Appendix D of the Compliance Submittal Design Report (Sandia, 1996), Section D4.

28 7.4.4.1 Thermal Analysis

The objectives of this calculation were (1) to determine temperature histories within the asphalt seal and the surrounding salt and (2) to determine effects of the length of the waterstop.

Results indicate that the center of the asphalt column will cool from its emplaced temperature of 180°C to 83°C, 49°C, 31°C, and 26°C at times 0.1 year, 0.2 year, 0.5 year, and 1.0 year, respectively. Similarly, the asphalt/salt interface temperatures at corresponding times are 47°C, 38°C, 29°C, and 26°C. The time required for a waterstop to cool is significantly less than that required to cool the asphalt column. Based on these results, about 40 days are required for asphalt to cool to an acceptable working environment temperature. The thermal impact on enhanced creep rate of the surrounding salt is considered to be negligible.

38 7.4.4.2 Structural Analysis

The objective of this analysis was to calculate pressures in asphalt that result from restrained creep of the surrounding salt and to evaluate stresses induced on the concrete seal component by such pressurization. 1 Results indicate that pressures in the waterstops after 100 years are 1.8 MPa, 2.5 MPa, and 3.2

2 MPa for the upper, middle, and lower waterstops, respectively. Based on these results, the

3 structural integrity of concrete components will not be compromised by imposed pressures, and

4 the rock surrounding the asphalt will not be fractured by the pressure. The pressure from

s asphalt is enough to initiate healing of the DRZ surrounding the waterstop.

6 7.4.4.3 Shrinkage Analysis

The objective of this analysis was to calculate shrinkage of the asphalt column as it cools from
 its emplaced temperature to an acceptable working environment temperature. Results of this
 analysis indicate that the 42-m asphalt column will shrink 0.9 m in height as the asphalt cools
 from its emplaced temperature of 180°C to 38°C.

11 7.5 Disturbed Rock Zone Considerations

12 7.5.1 General Discussion of DRZ

Microfracturing leading to a DRZ occurs within salt whenever excavations are made. Laboratory
 and field measurements show that a DRZ has enhanced permeability. The body of evidence
 strongly suggests that induced fracturing is reversible and healed when deviatoric stress states
 created by the opening are reduced. Rigid seal components in the shaft provide a restraint to
 salt creep closure, thereby inducing healing stress states in the salt. A more detailed discussion
 of the DRZ is included in Appendix D in the Compliance Submittal Design Report (Sandia,
 1996).

20 7.5.2 Structural Analyses

Three analyses were performed to determine the behavior of the DRZ in the rock mass 21 surrounding the shaft. The first analysis considered time-dependent DRZ development and 22 subsequent healing of intact Salado salt surrounding each of the four seal materials. The 23 second analysis considered time-dependent development of the DRZ within anhydrite and 24 polyhalite interbeds within the Salado Formation. The last analysis considered time-independent 25 DRZ development within the near-surface and Rustler formations. These analyses are 26 discussed below and given in more detail in Appendix D of the Compliance Submittal Design 27 Report (Sandia, 1996), Section D5. Results from these analyses were used as input conditions 28 for the fluid flow analysis presented in Section 8 and Appendix C of the Compliance Submittal 29 Design Report (Sandia, 1996). 30

31 7.5.2.1 Salado Salt

The objective of this calculation was to determine time-dependent extent of the DRZ in salt, assuming no pore pressure effects, for each of the four shaft seal materials (i.e., concrete, crushed salt, compacted clay, and asphalt. The seal materials below a depth of about 300 m provide sufficient rigidity to heal the DRZ within 100 years. Asphalt, modeled as a weak elastic material, will not create a stress state capable of healing the DRZ because it is located high in the Salado.

1 7.5.2.2 Salado Anhydrite Beds

2 The objective of this calculation was to determine the extent of the DRZ within the Salado 3 anhydrite and polyhalite interbeds as a result of creep of surrounding salt.

For all interbeds, the factor of safety against failure (shear or tensile fracturing) increases with depth into the rock surrounding the shaft wall. These results indicate that, with the exception of Marker Bed 117 (**MB117**), the factor of safety is greater than 1 (no DRZ will develop) for all interbeds. For MB117, the potential for fracturing is localized to within 1 m of the shaft wall.

8 7.5.2.3 Near-Surface and Rustler Formations

9 The objective of this calculation was to determine the extent of the DRZ surrounding the shafts 10 in the near-surface and Rustler formations.

Rock types in near-surface and Rustler formations are anhydrite, dolomite, and mudstone.
 These rock types exhibit time-independent behavior. Results indicate that no DRZ will develop
 in anhydrite and dolomite (depths between 165 and 213 m). For mudstone layers, the radial
 extent of the DRZ increases with depth, reaching a maximum of 2.6 shaft radii at a depth of 223
 m.

16 7.6 Other Analyses

This section discusses two structural analyses performed in support of design concerns, namely
(1) the asphalt waterstops constructability and (2) benefits from shaft station backfilling.
Analyses performed in support of these efforts are discussed below and given in more detail in
Appendix D of the Compliance Submittal Design Report (Sandia, 1996), Section D6.

21 7.6.1 Asphalt Waterstops

The DRZ is a major contributor to fluid flows through a low permeability shaft seal system, 22 regardless of the materials emplaced within the shaft. Therefore, to increase the confidence in 23 the overall shaft seal, low permeability layers (termed radial waterstops) were included to 24 intersect the DRZ surrounding the shaft. These waterstops are emplaced to alter the flow 25 direction either inward toward the shaft seal or outward toward intact salt. Asphalt-filled 26 waterstops will be effective soon after emplacement. The objectives of these structural 27 calculations were to evaluate performance of the waterstops in terms of (1) intersecting the DRZ 28 around the shaft, (2) inducing a new DRZ because of special excavation, and (3) promoting 29 30 healing of the DRZ.

Results indicate that the DRZ from the shaft extends to a radial distance of less than one shaft 31 radius (3.04 m). Waterstop excavation extends the DRZ radially to about 1.4 shaft radii (4.3 m). 32 However, this extension is localized within the span of the concrete component and extends 33 minimally past the waterstop edge. The DRZ extent reduced rapidly after the concrete and 34 asphalt restrained creep of the surrounding salt. After 20 years, the spatial extent of the DRZ is 35 localized near the asphalt-concrete interface, extending spatially into the salt at a distance of 36 less than 2 m. Based on these results, construction of waterstops is possible without 37 substantially increasing the DRZ. Furthermore, the waterstop extends well beyond the 38 maximum extent of the DRZ surrounding the shaft and effectively blocks this flow path (within 2 39 years after emplacement), albeit over only a short length of the flow path. 40

1 7.6.2 Shaft Pillar Backfilling

The objective of this calculation was to assess potential benefits from backfilling a portion of the 2 shaft pillar to reduce subsurface subsidence and thereby decrease the potential for inducing 3 fractures along the shaft wall. The calculated subsidence without backfilling is less than one 4 foot, due to the relatively low extraction ratio at the WIPP. Based on the results of this analysis, 5 backfilling portions of the shaft pillar would result in only 10% to 20% reduction in surface 6 subsidence. This reduction in subsidence from backfilling is not considered enough to warrant 7 backfilling the shaft pillar area. The shaft seals within the Salado are outside the angle-of-draw 8 for any horizontal displacements caused by the subsidence over the waste panels. Moreover, 9 horizontal strains caused by subsidence induced by closures within the shaft pillar are 10 compressive in nature and insignificant in magnitude to induce fracturing along the shaft wall. 11

8. Hydrologic Evaluation of the Shaft Seal System

2 8.1 Introduction

The design guidance in Section 3 presented the rationale for sealing the shaft seal system with 3 low permeability materials, but it did not provide specific performance measures for the seal 4 system. This section compares the hydrologic behavior of the system to several performance 5 measures that are directly related to the ability of the seal system to limit liquid and gas flows 6 through the seal system. The hydrologic evaluation is focused on the processes that could 7 result in fluid flow through the shaft seal system and the ability of the seal system to limit any 8 such flow. Transport of radiological or hazardous constituents will be limited if the carrier fluids 9 are similarly limited. 10

The hydrologic performance models are fully described in Appendix C of the Compliance 11 Submittal Design Report (Sandia, 1996). The analyses presented are deterministic. Quantitative 12 values for those parameters that are considered uncertain and that may significantly impact the 13 primary performance measures have been varied, and the results are presented in Appendix C 14 the Compliance Submittal Design Report (Sandia, 1996). This section summarizes the seal 15 system performance analyses and discusses results within the context of the design guidance 16 of Section 3. The results demonstrate that (1) fluid flows will be limited within the shaft seal 17 system and (2) uncertainty in the conceptual models and parameters for the seal system are 18 mitigated by redundancy in component function and materials. 19

20 8.2 Performance Models

The physical processes that could impact seal system performance are presented in detail in 21 Appendix C of the Compliance Submittal Design Report (Sandia, 1996). These processes have 22 been incorporated into four performance models. These models evaluate (1) downward 23 migration of groundwater from the Rustler Formation, (2) gas migration and consolidation of the 24 crushed salt seal component, (3) upward migration of brines from the repository, and (4) flow 25 between water-bearing zones in the Rustler Formation. The first three are analyzed using 26 numerical models of the Air Intake Shaft (AIS) seal system and the finite-difference codes 27 SWIFT II and TOUGH28W. These codes are extensively used and well documented within the 28 scientific community. A complete description of the models is provided in Appendix C of the 29 Compliance Submittal Design Report (Sandia, 1996). The fourth performance model uses a 30 simple, analytical solution for fluid flow. Results from the analyses are summarized in the 31 following sections and evaluated in terms of the design guidance presented in Section 3. 32

Material properties and conceptual models that may significantly impact seal system performance have been identified, and uncertainty in properties and models have been addressed through variation of model parameters. These parameters include (1) the effective permeability of the DRZ, (2) those describing salt column consolidation and the relationship between compacted salt density and permeability, and (3) repository gas pressure applied at the base of the shaft seal system.

8.3 Downward Migration of Rustler Groundwater

40 The shaft seal system is designed to limit groundwater flowing into and through the shaft sealing

- system (see Section 3). The principal source of groundwater to the seal system is the Culebra
- 42 Member of the Rustler Formation. The Magenta Member of this formation is also considered a

groundwater source, albeit a less significant source than the Culebra. No significant sources of 1

- 2 groundwater exist within the Salado Formation; however, brine seepage has been noted at a
- number of the marker beds. The modeling includes the marker beds, as discussed in Appendix 3
- C of the Compliance Submittal Design Report (Sandia, 1996). Downward migration of Rustler 4
- groundwater must be limited so that liquid saturation of the compacted salt column salt column 5
- does not impact the consolidation process and to ensure that significant quantities of brine do 6
- not reach the repository horizon. Because it is clear that limitation of liquid flow into the salt 7
- column necessarily limits liquid flow to the repository, the volumetric flux of liquid into and 8
- through the salt column were selected as performance measures for this model. 9

Consolidation of the compacted salt column salt column will be most rapid immediately following 10 seal construction. Simulations were conducted for the 200-year period following closure to 11 demonstrate that, during this initial period, downward migration of Rustler groundwater will be 12 insufficient to impact the consolidation process. Lateral migration of brine through the marker 13 beds is also quantified in the analysis and shown to be nondetrimental to the function of the salt 14 column. 15

8.3.1 **Analysis Method** 16

Seal materials will not, in general, be fully saturated with liquid at the time of construction. The 17

host rock surrounding the shafts will also be partially desaturated at the time of seal 18

construction. The analysis presented in this section assumes a fully saturated system. The 19

effects of partial saturation of the shaft seal system are favorable in terms of system 20

performance, as will be discussed in Section 8.3.2. 21

Seal material and host rock properties used in the analyses are discussed in Appendix C of the 22 Compliance Submittal Design Report (Sandia, 1996), Section C3. Appendix G2-A contains a 23 detailed discussion of seal material properties. A simple perspective on the effects of material 24 and host rock properties may be obtained from Darcy's Law. At steady-state, the flow rate in a 25 fully saturated system depends directly on the system permeability. The seal system consists of 26 the component material and host rock DRZ. Low permeability is specified for the engineered 27 materials; thus the system component most likely to impact performance is the DRZ. Rock 28 mechanics calculations presented in Appendix D of the Compliance Submittal Design Report 29 (Sandia, 1996) predict that the DRZ in the Salado Formation will not be vertically continuous 30 because of the intermittent layers of stiff anhydrites (marker beds). Asphalt waterstops are 31 included in the design to minimize DRZ impacts. The effects of the marker beds and the asphalt 32 waterstops on limiting downward migration are explicitly simulated through variation of the 33

permeability of the layers of Salado DRZ. 34

Initial, upper, and lateral boundary conditions for the performance model are consistent with 35 field measurements for the physical system. At the base of the shaft a constant atmospheric 36 pressure is assumed. 37

8.3.2 Summary of Results 38

The initial pore volumes in the filled repository and the AIS salt column are approximately 39 460,000 m³ and 250 m³, respectively. The performance model predicts a maximum cumulative 40 flow of less than 5 m³ through the sealed shafts for the 200 years following closure. If the 41 marker beds have a disturbed zone immediately surrounding the shaft, the maximum flow is 42 less than 10 m³ during the same period. Assuming the asphalt waterstops are not effective in 43

interrupting the vertical DRZ, the volumetric flow increases but is still less than 30 m³ for the 200
 years following closure. These volumes are less than 1/100 of 1% of the pore volume in the

repository and less than 20% of the initial pore volume of the salt column.

Two additional features of the model predictions should also be considered. The first of these is 4 that flow rates fall from less than 1 m^3 /year in the first five years to negligible values within 10 5 years of seal construction. Therefore most of the cumulative flow occurs within a few years 6 following closure. The second feature is the model prediction that the system returns to nearly 7 ambient undisturbed pressures within two years. The repressurization occurs quickly within the 8 model due to the assumption of a fully saturated flow regime because of brine incompressibility. 9 As will be discussed in Section 8.4, the pore pressure in the compacted salt column is a critical 10 variable in the analysis. The pressure profiles predicted by the model are an artifact of the 11 assumption of full liquid saturation and do not apply to the pore pressure analysis of the salt 12 column. 13

The magnitude of brine flow that can reach the repository through a sealed shaft is minimal and will not impact repository performance. The flow that reaches the salt column must be assessed with regard to the probable impacts on the consolidation process. Although the volume of flow to the salt column is a small percentage of the available pore volume, the saturation state and fluid pore pressure of this component are the variables of significance. These issues cannot be addressed by a fully saturated model. Instead it is necessary to include these findings in a multiphase model that includes the salt column. This is the topic of Section 8.4.

The results of the fully saturated model will over-predict the flow rates through the sealed shaft. 21 This analysis does not take credit for the time required for the system to resaturate, nor does it 22 take credit for the sorptive capabilities of the clay components. The principal source of 23 groundwater to the system is the Rustler Formation. The upper clay component is located below 24 the Rustler and above the salt column and will be emplaced at a liquid saturation state of 25 approximately 80%. Bentonite clays exhibit strong hydrophilic characteristics, and it is expected 26 that the upper clay component will have these same characteristics. As a result, it is possible 27 that a significant amount of the minimal Rustler groundwater that reaches the clay column will 28 be absorbed and retained by this seal component. Although this effect is not directly included in 29 the present analysis, the installation of a partially saturated clay component provides assurance 30 that the flow rates predicted by the model are maximum values. 31

8.4 Gas Migration and Consolidation of Compacted Salt Column

The seal system is designed to limit the flow of gas from the disposal system through the sealed 33 shafts. Migration of gas could impact performance if this migration substantially increases the 34 fluid pore pressure of the compacted salt column. The initial pore pressure of the salt column 35 will be approximately atmospheric. The sealed system will interact with the adjacent desaturated 36 host rock as well as the far-field formation. Natural pressurization will occur as the system 37 returns to an equilibrium state. This pressurization, coupled with seepage of brine through the 38 marker beds, will also result in increasing fluid pore pressure within the compacted salt column. 39 The analysis presented in this section addresses the issue of fluid pore pressure in the 40 compacted salt column resulting from the effects of gas generation at the repository horizon and 41 natural repressurization from the surrounding formation. A brief discussion on the impedance to 42 gas flow afforded by the lower compacted clay column is also presented. 43

1 8.4.1 Analysis Method

A multi-phase flow model of the lower seal system was developed to evaluate the performance 2 of components extending from the middle SMC component to the repository horizon. Rock 3 mechanics calculations presented in Section 7 and Appendix D of the Compliance Submittal 4 Design Report (Sandia, 1996) predict that the compacted salt column will consolidate for a 5 period of approximately 400 years if the fluid-filled pores of the column do not produce a 6 backstress. Within the physical setting of the compacted salt column, three processes have 7 been identified which may result in a significant increase in pore pressure: groundwater flow 8 from the Rustler Formation, gas migration from the repository, and natural fluid flow and 9 repressurization from the Salado Formation. The first two processes were incorporated into the 10 model as initial and boundary conditions, respectively. The third process was captured in all 11 simulations through modeling of the lithologies surrounding the shaft. Simulations were 12 conducted for 200 years following closure to evaluate any effects these processes might have 13 on the salt column during this initial period. 14

As discussed in Section 8.3.1, the host rock DRZ is an important consideration in seal system
 performance. A vertically continuous DRZ could exist in both the Rustler and Salado
 Formations. Concrete-asphalt waterstops are included in the design to add assurance that a

DRZ will not adversely impact seal performance. The significance of a continuous DRZ and

19 waterstops will be evaluated based on results of the performance model.

A detailed description of the model grid, assumptions, and parameters is presented in Appendix

C of the Compliance Submittal Design Report (Sandia, 1996).

22 8.4.2 Summary of Results

The consolidation process is a function of both time and depth. The resultant permeability of the compacted salt column will similarly vary. To simplify the evaluation, an effective permeability of the salt component was calculated. This permeability is calculated by analogy to electrical circuit theory. The permeability of each model layer is equated to a resistor in a series of resistors. The equivalent resistance (i.e., permeability) of a homogeneous column of identical length is derived in this manner. Figure G2-11 illustrates this process.

Results of the performance model simulations are summarized in Table G2-12. The effective 29 permeabilities were calculated by the model assuming that, as the salt consolidated, 30 permeability was reduced pursuant to the best-fit line through the experimental data (Appendix 31 G2-A, Figure G2A-7). From Table G2-12 it is clear that, for all simulated conditions, the salt 32 column consolidates to very low values in 200 years. Differences in the effective permeability 33 because of increased repository gas pressure and a vertically continuous DRZ were negligible. 34 The DRZ around concrete components is predicted to heal (Appendix D of the Compliance 35 Submittal Design Report (Sandia, 1996)) within 25 years. If the asphalt waterstops do not 36 function as intended, the DRZ in this region will still heal in 25 years, as compared to 2 years for 37 effective waterstops. The effective permeability of the compacted salt column increases by 38 about a factor of two for this condition. However, the resultant permeability is sufficiently low that 39 the compacted salt columns will comprise permanent effective seals within the WIPP shafts. 40

Repository Pressure	Rustler Flow (m ³)	Continuous DRZ (Yes/No)	Concrete-Asphalt Waterstop Healing Time (Years)	Effective Permeability at 200 Years (m²)
7 MPa in 100 Years	0	No	2	3.3×10 ⁻²⁰
14 MPa in 200 Years	0	No	2	3.3×10 ^{−20}
7 MPa in 100 Years	2.7	Yes	2	3.4×10 ⁻²⁰
7 MPa in 100 Years	17.2	Yes	25	6.0×10 ⁻²⁰

 Table G2-12

 Summary of Results from Performance Model

The relationship between the fractional density (i.e., consolidation state) of the compacted salt 3 column and permeability is uncertain, as discussed in Appendix G2-A. Lines drawn through the 4 experimental data (Figure A-7) provide a means to guantify this uncertainty but do not capture 5 the actual physical process of consolidation. As observed through microscopy, consolidation is 6 dominated by pressure solution and redeposition, a mechanism of mass movement facilitated 7 by the presence of moisture on grain boundaries (Hansen and Ahrens, 1996). As this process 8 continues, the connected porosity and hence permeability of the composite mass will reduce at 9 a rate that has not been characterized by the data collected in WIPP experiments. The results of 10 the multi-phase performance model presented in Table G2-12 used a best-fit line through the 11 data. Additional simulations were conducted using a line that represents a 95% certainty that 12 the permeability is less than or equal to values taken from this line. Model simulations that used 13 the 95% line are not considered representative of the consolidation process. However, these 14 results provide an estimation of the significance that this uncertainty may have on the seal 15 system performance. 16

Figure G2-12 depicts the effective permeability of the salt column as a function of time using the 17 95% line. The consolidation process, and hence permeability reduction, essentially stopped at 18 75 years for this simulation. Although the model predicts that the fractional density at the base 19 of the salt column will reach approximately 97% of the density of intact halite, the permeability 20 remains several orders of magnitude higher than that of the surrounding host rock. As a result, 21 repressurization occurs rapidly throughout the vertical extent of the compacted salt column, and 22 consolidation ceases. Laboratory experiments have shown that permeability to brine should 23 decrease to levels of 10⁻¹⁸ to 10⁻²⁰ m² at the fractional densities predicted by the performance 24 model. The transport of brine within the consolidating salt will reduce the permeability even 25 further (Brodsky et al., 1995). The predicted permeability of 10⁻¹⁶ m² is still sufficiently low that 26 brine migration would be limited (DOE, 1995). However, the results of this analysis are more 27 valuable in terms of demonstrating the coupled nature of the mechanical and hydrological 28 behavior of consolidating crushed salt. 29

A final consideration within this performance model relates to the lower compacted clay column. 30 This clay column is included in the design to provide a barrier to both gas and brine migration 31 from the repository horizon. The ability of the clay to prevent gas migration will depend upon its 32 liquid saturation state (Section 5 and Appendix G2-A). The lower clay component has an initial 33 liquid saturation of about 80%, and portions of the column achieve brine saturations of nearly 34 100% during the 200 year simulation period. If the clay component performs as designed, gas 35 migration through this component should be minimal. An examination of the model gas 36 37 saturations indicates that, for all runs, gas flow occurs primarily through the DRZ prior to

1 healing. These model predictions are consistent with field demonstrations that brine-saturated

- 2 bentonite seals will prevent gas flow at differential pressures of up to 4 MPa (Knowles and
- 3 Howard, 1996).

4 8.5 Upward Migration of Brine

The performance model discussed in Section 8.3 was modified to simulate undisturbed 5 equilibrium pressures. As discussed in Appendix C of the Compliance Submittal Design Report 6 (Sandia, 1996), the Salado Formation is overpressurized with respect to the measured heads in 7 the Rustler, and upward migration of contaminated brines could occur through an inadequately 8 sealed shaft. Sections 8.3 and 8.4 demonstrated that the compacted salt column will 9 consolidate to a low permeability following repository closure. Appendix D of the Compliance 10 Submittal Design Report (Sandia, 1996) and Section 7 show that the DRZ surrounding the long-11 term clay and crushed salt seal components will completely heal within the first several 12 decades. As a result, upward migration at the base of the Salado salt is predicted to be 13 approximately 1 m³ over the regulatory period. At the Rustler/Salado contact, a total of 14 approximately 20 m³ migrates through the sealed AIS over the regulatory period. The only brine 15 sources between these two depths are the marker beds. It can therefore be concluded that most 16 of the brine flow reaching the Rustler/Salado contact originates in marker beds above the 17 repository horizon. The seal system effectively limits the flow of brine and gas from the 18 repository through the sealed shafts throughout the regulatory period. 19

20 8.6 Intra-Rustler Flow

The potential exists for vertical flow within water-bearing strata of the Rustler Formation. Flow 21 rates were estimated using a closed form solution of the steady-state saturated flow equation 22 (Darcy's Law). The significance of the calculated flow rates can be assessed in terms of the 23 width of the hydraulic disturbance (i.e., plume half-width) generated in the recipient flow field. 24 The plume half-width was calculated to be minimal for all expected conditions (Compliance 25 Submittal Design Report (Sandia, 1996), Section C7). Intra-Rustler flow is therefore concluded 26 to be of such a limited quantity that (1) it will not affect either the hydraulic or chemical regime in 27 the Rustler and (2) it will not be detrimental to the seal system. 28

1 9. Conclusions

26

27

The principal conclusion drawn from discussions in the previous sections and details provided in the appendices is that an effective, implementable design has been documented for the WIPP shaft sealing system. Specifically, the six elements of the Design Guidance, Table G2-12, are implemented in the design in the following manner:

- The shaft sealing system shall limit the migration of radiological or other hazardous
 constituents from the repository horizon to the regulatory boundary during the 10,000 year regulatory period following closure.
- Based on the analysis presented in Section 8.5, it was determined that this shaft
 sealing system effectively limits the migration of radiological or other hazardous
 constituents from the repository horizon to the regulatory boundary during the 10,000 year regulatory period following closure.
- The shaft sealing system shall limit groundwater flowing into and through the shaft
 sealing system.
- The combination of the seal components in the Salado Formation, the Rustler Formation, and above the Rustler combine to produce a robust system. Based on analysis presented in Section 8.3, it was concluded that the magnitude of brine flow that can reach the repository through the sealed shaft is minimal and will not impact repository performance.
- The shaft sealing system shall limit chemical and mechanical incompatibility of seal
 materials with the seal environment.
- The sealing system components are constructed of materials possessing high durability and compatibility with the host rock. Engineered materials including saltsaturated concrete, bentonite, clays, and asphalt are expected to retain their design properties over the regulatory period.
 - 4. The shaft sealing system shall limit the possibility for structural failure of individual components of the sealing system.
- Analysis of components has determined that: (a) the structural integrity of concrete 28 components will not be compromised by induced radial stress, imposed vertical stress, 29 temperature gradients, dynamic compaction of overlying materials, or swelling 30 pressure associated with bentonite (Section 7.4.1); (b) the thermal impact of asphalt 31 on the creep rate of the salt surrounding the asphalt waterstops is negligible (Section 32 7.4.4); and (c) the pressure from the asphalt element of the concrete-asphalt 33 waterstops is sufficient to initiate healing of the surrounding DRZ within two years of 34 emplacement (Section 7.6.1). The potential for structural failure of sealing components 35 is minimized by the favorable compressive stress state that will exist in the sealed 36 WIPP shafts. 37
- 5. The shaft sealing system shall limit subsidence of the ground surface in the vicinity of the shafts and the possibility of accidental entry after sealing.

- 1 The use of high density sealing materials that completely fill the shafts eliminates the 2 potential for shaft wall collapse, eliminates the possibility of accidental entry after 3 closure, and assures that local surface depressions will not occur at shaft locations.
- 6. The shaft sealing system shall limit the need to develop new technologies or materials
 for construction of the shaft sealing system.
- 6 The shaft sealing system utilizes existing construction technologies (identified in 7 Section 6) and materials (identified in Section 5).

The design guidance can be summarized as focusing on two principal questions: Can you build 8 it, and will it work? The use or adaptation of existing technologies for the placement of the seal 9 components combined with the use of available, common materials assure that the design can 10 be constructed. Performance of the sealing system has been demonstrated in the hydrologic 11 analyses that show very limited flows of gas or brine, in structural analyses that assure 12 acceptable stress and deformation conditions, and in the use of low permeability materials that 13 will function well in the environment in which they are placed. Confidence in these conclusions 14 is bolstered by the basic design approach of using multiple components to perform each 15 intended sealing function and by using extensive lengths within the shafts to effect a sealing 16 system. Additional confidence is added by the results of field and lab tests in the WIPP 17 environment that support the data base for the seal materials. 18

1 10. References

Ahrens, E. H., and F. D. Hansen. 1995. *Large-Scale Dynamic Compaction Demonstration Using* WIPP Salt: Fielding and Preliminary Results. SAND95-1941. Albuquerque, NM: Sandia National

4 Laboratories. (Copy on file in the Sandia WIPP Central Files, Sandia National Laboratories,

5 Albuquerque, NM [SWCF] as WPO31104.)

6 Ahrens, E. H., and M. Onofrei. 1996. "Ultrafine Cement Grout for Sealing Underground Nuclear

7 Waste Repositories," 2nd North American Rock Mechanics Symposium (NARMS 96), Montreal,

8 *Quebec, June 19-21, 1996.* SAND96-0195C. Albuquerque, NM: Sandia National Laboratories.

9 (Copy on file in the SWCF as WPO31251.)

Ahrens, E. H., T. F. Dale, and R. S. Van Pelt. 1996. *Data Report on the Waste Isolation Pilot*

- 11 Plant Small-Scale Seal Performance Test, Series F Grouting Experiment. SAND93-1000.
- Albuquerque, NM: Sandia National Laboratories. (Copy on file in the SWCF as WPO37355.)
- Andersen, P. J., M.E. Andersen, and D. Whiting. 1992. *A Guide to Evaluating Thermal Effects in Concrete Pavements*. SHRP-C/FR-92-101. Washington, DC: Strategic Highway Research
- ¹⁵ Program, National Research Council. (Copy on file in the SWCF.)

Avis, J.D., and G. J. Saulnier, Jr. 1990. Analysis of the Fluid-Pressure Responses of the Rustler

Formation at H-16 to the Construction of the Air-Intake Shaft at the Waste Isolation Pilot Plant (WIPP) Site. SAND89-7067. Albuquerque, NM: Sandia National Laboratories. (Copy on file in

- (WIPP) Site. SAND89-7067. Albuq
 the SWCF as WPO24168.)
- Bachman, G. O. 1987. Karst in Evaporites in Southeastern New Mexico. SAND86-7078.
- Albuquerque, NM: Sandia National Laboratories. (Copy on file in the SWCF as WPO24006.)
- Beauheim, R. L. 1987. Interpretations of Single-Well Hydraulic Tests Conducted at and Near the
- 23 Waste Isolation Pilot Plant (WIPP) Site, 1983-1987. SAND87-0039. Albuquerque, NM: Sandia
- National Laboratories. (Copy on file in the SWCF as WPO27679.)
- Beauheim, R. L., R. M. Roberts, T. F. Dale, M.D. Fort, and W. A. Stensrud. 1993. *Hydraulic*
- 26 Testing of Salado Formation Evaporites at the Waste Isolation Pilot Plant Site: Second
- 27 Interpretive Report. SAND92-0533. Albuquerque, NM: Sandia National Laboratories. (Copy on
- file in the SWCF as WPO23378.)
- ²⁹ Brinster, K.F. 1991. *Preliminary Geohydrologic Conceptual Model of the Los Medaños Region*

30 Near the Waste Isolation Pilot Plant for the Purpose of Performance Assessment. SAND89-

- 7147. Albuquerque, NM: Sandia National Laboratories. (Copy on file in the SWCF as
 WPO27781.)
- Brodsky, N. S. 1994. Hydrostatic and Shear Consolidation Tests with Permeability
- 34 Measurements on Waste Isolation Pilot Plant Crushed Salt. SAND93-7058. Albuquerque, NM:
- 35 Sandia National Laboratories.
- Brodsky, N. S., D. H. Zeuch, and D. J. Holcomb. 1995. "Consolidation and Permeability of
- 37 Crushed WIPP Salt in Hydrostatic and Triaxial Compression," Rock Mechanics Proceedings of
- the 35th U.S. Symposium, University of Nevada, Reno, NV, June 5-7, 1995. Eds. J. J. K.

Daemen and R.A. Schultz. Brookfield, VT: A. A. Balkema. 497-502. (Copy on file in the SWCF 1 2 as WPO22432.)

- Brodsky, N. S., F. D. Hansen, and T. W. Pfeifle. 1996. "Properties of Dynamically Compacted 3
- WIPP Salt," 4th International Conference on the Mechanical Behavior of Salt, Montreal, 4
- Quebec, June 17-18, 1996. SAND96-0838C. Albuquerque, NM: Sandia National Laboratories. 5
- (Copy on file at the Technical Library, Sandia National Laboratories, Albuquergue, NM.) 6
- Callahan, G. D., M. C. Loken, L. D. Hurtado, and F. D. Hansen. 1996. "Evaluation of 7
- Constitutive Models for Crushed Salt," 4th International Conference on the Mechanical Behavior 8
- of Salt, Montreal, Quebec, June 17-18, 1996, SAND96-0791C, Albuquerque, NM: Sandia 9
- National Laboratories. (Copy on file in the SWCF as WPO36449.) 10
- Cauffman, T. L., A.M. LaVenue, and J.P. McCord. 1990. Ground-Water Flow Modeling of the 11 Culebra Dolomite. Volume II: Data Base. SAND89-7068/2. Albuquerque, NM: Sandia National 12
- Laboratories. (Copy on file in the SWCF as WPO10551.) 13
- Dale, T., and L. D. Hurtado. 1996. "WIPP Air-Intake Shaft Disturbed-Rock Zone Study," 4th 14
- International Conference on the Mechanical Behavior of Salt, Montreal, Quebec, June 17-18, 15
- 1996. SAND96-1327C. Albuquerque, NM: Sandia National Laboratories. (Copy on file in the 16
- SWCF.) 17

DOE (U.S. Department of Energy). 1995. Waste Isolation Pilot Plant Sealing System Design 18 Report. DOE/WIPP-95-3117. Carlsbad, NM: U.S. Department of Energy, Waste Isolation Pilot 19 Plant. (Copy on file in the SWCF as WPO29062.)

- 20
- EPA (Environmental Protection Agency). 1996a. Criteria for the Certification and Re-21
- Certification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal 22
- Regulations. Response to Comments Document for 40 CFR Part 194. EPA 402-R-96-001. 23
- Washington, DC: U.S. Environmental Protection Agency, Office of Radiation and Indoor Air. 24
- (Copy on file in the Nuclear Waste Management Library, Sandia National Laboratories, 25
- Albuquerque, NM.) 26
- EPA (Environmental Protection Agency). 1996b. Criteria for the Certification and Re-27
- Certification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal 28
- Regulations. Background Information Document for 40 CFR Part 194. EPA 402-R-96-002. 29
- Washington, DC: U.S. Environmental Protection Agency, Office of Radiation and Indoor Air. 30
- (Copy on file in the Nuclear Waste Management Library, Sandia National Laboratories, 31
- Albuquerque, NM.) 32
- Gray, M. N. 1993. OECD/NEA International Stripa Project. Overview Volume III: Engineered 33
- Barriers. Stockholm, Sweden: SKB, Swedish Nuclear Fuel and Waste Management Company. 34
- (Copy on file in the Nuclear Waste Management Library, Sandia National Laboratories, 35
- Albuquerque, NM as TD898.2 .G73 1993.) 36
- Hansen, F. D., and E. H. Ahrens. 1996. "Large-Scale Dynamic Compaction of Natural Salt," 4th 37
- International Conference on the Mechanical Behavior of Salt, Montreal, Quebec, June 17-18, 38
- 1996. SAND96-0792C. Albuquerque, NM: Sandia National Laboratories. (Copy on file in the 39
- 40 SWCF as WPO39544.)

Hansen, F. D., E. H. Ahrens, A. W. Dennis, L. D. Hurtado, M. K. Knowles, J. R. Tillerson, T. W.

2 Thompson, and D. Galbraith. 1996. "A Shaft Seal System for the Waste Isolation Pilot Plant,"

3 Proceedings of SPECTRUM '96, Nuclear and Hazardous Waste Management, International

4 Topical Meeting, American Nuclear Society/Department of Energy Conference, Seattle, WA,

5 August 18-23, 1996. SAND96-1100C. Albuquerque, NM: Sandia National Laboratories. (Copy

6 on file in the SWCF as WPO39369.)

7 Haug, A., V.A. Kelley, A.M. LaVenue, and J. F. Pickens. 1987. *Modeling of Ground-Water Flow*

8 in the Culebra Dolomite at the Waste Isolation Pilot Plant (WIPP) Site: Interim Report. SAND86-

9 7167. Albuquerque, NM: Sandia National Laboratories. (Copy on file in the SWCF as

10 WPO28486.)

Hills, J. M. 1984. "Sedimentation, Tectonism, and Hydrocarbon Generation in [the] Delaware

Basin, West Texas and Southeastern New Mexico," American Association of Petroleum

13 *Geologists Bulletin*. Vol. 68, no. 3, 250-267. (Copy on file in the SWCF.)

- Holt, R. M., and D. W. Powers. 1990. *Geologic Mapping of the Air Intake Shaft at the Waste Isolation Pilot Plant*. DOE-WIPP 90-051. Carlsbad, NM: Westinghouse Electric Corporation for
 U.S. Department of Energy. (Copy on file in the Nuclear Waste Management Library, Sandia
- 17 National Laboratories, Albuquerque, NM.)

18 Knowles, M. K., and C. L. Howard. 1996. "Field and Laboratory Testing of Seal Materials

19 Proposed for the Waste Isolation Pilot Plant," *Proceedings of the Waste Management 1996*

20 Symposium, Tucson, AZ, February 25-29, 1996. SAND95-2082C. Albuquerque, NM: Sandia

21 National Laboratories. (Copy on file in the SWCF as WPO30945.)

Knowles, M. K., D. Borns, J. Fredrich, D. Holcomb, R. Price, D. Zeuch, T. Dale, and R. S. Van

Pelt. 1996. "Testing the Disturbed Zone Around a Rigid Inclusion in Salt," *4th Conference on the*

24 Mechanical Behavior of Salt, Montreal, Quebec, June 17-18, 1996. SAND95-1151C.

Albuquerque, NM: Sandia National Laboratories. (Copy on file in the SWCF.)

Lambert, S. J. 1992. "Geochemistry of the Waste Isolation Pilot Plant (WIPP) Site, Southeastern
 New Mexico, U.S.A.," *Applied Geochemistry*. Vol. 7, no. 6, 513-531. (Copy on file in the SWCF
 as WPO26361.)

LaVenue, A.M., T. L. Cauffman, and J. F. Pickens. 1990. *Ground-Water Flow Modeling of the Culebra Dolomite. Volume I: Model Calibration.* SAND89-7068/1. Albuquerque, NM: Sandia
 National Laboratories. (Copy on file in the SWCF as WPO24085.)

Mercer, J. W. 1983. Geohydrology of the Proposed Waste Isolation Pilot Plant Site, Los

33 *Medaños Area, Southeastern New Mexico*. Water-Resources Investigations Report 83-4016.

Albuquerque, NM: U.S. Geological Survey, Water Resources Division. (Copy on file in the

Nuclear Waste Management Library, Sandia National Laboratories, Albuquerque, NM.) (Copy
 on file in the SWCF.)

Mercer, J. W., and B. R. Orr. 1979. Interim Data Report on the Geohydrology of the Proposed
 Waste Isolation Pilot Plant Site, Southeast New Mexico. Water-Resources Investigations Report

79-98. Albuquerque, NM: U.S. Geological Survey, Water Resources Division. (Copy on file in

40 the SWCF.)

Nowak, E. J., J. R. Tillerson, and T. M. Torres. 1990. Initial Reference Seal System Design: 1

2 Waste Isolation Pilot Plant. SAND90-0355. Albuquerque, NM: Sandia National Laboratories.

(Copy on file in the SWCF as WPO23981.) 3

Pfeifle, T. W., F. D. Hansen, and M. K. Knowles. 1996. "Salt-Saturated Concrete Strength and 4

Permeability," 4th Materials Engineering Conference, ASCE Materials Engineering Division, 5 Washington, DC, November 11-18, 1996. Albuquerque, NM: Sandia National Laboratories.)

6

Powers, D. W., S. J. Lambert, S-E. Shaffer, L. R. Hill, and W. D. Weart, eds. 1978. Geological 7

Characterization Report Waste Isolation Plant (WIPP) Site, Southeastern New Mexico. 8

SAND78-1596, Albuquerque, NM: Sandia National Laboratories, Vols, I-II, (Copy on file in the 9

SWCF as WPO5448, WPO26829-26830.) 10

Sandia (Repository Isolation Systems Department 6121). 1996. Waste Isolation Pilot Plant Shaft 11

Sealing System Compliance Submittal Design Report. SAND96-1326/1&2. Albuquerque, NM: 12

Sandia National Laboratories. 13

Saulnier, G. J., Jr., and J.D. Avis. 1988. Interpretation of Hydraulic Tests Conducted in the 14

Waste-Handling Shaft at the Waste Isolation Pilot Plant (WIPP) Site. SAND88-7001. 15

Albuquerque, NM: Sandia National Laboratories. (Copy on file in the SWCF as WPO24164.) 16

Stormont, J.C. 1984. Plugging and Sealing Program for the Waste Isolation Pilot Plant (WIPP). 17 SAND84-1057. Albuquergue, NM: Sandia National Laboratories. (Copy on file in the SWCF as 18

WPO24698.) 19

Van Sambeek, L.L., D. D. Luo, M.S. Lin, W. Ostrowski, and D. Ovenuga. 1993. Seal Design 20

Alternatives Study. SAND92-7340. Albuquerque, NM: Sandia National Laboratories. (Copy on 21

file in the SWCF as WPO23445.) 22

Vine, J.D. 1963. Surface Geology of the Nash Draw Quadrangle, Eddy County, New Mexico. 23

Geological Survey Bulletin 1141-B. Washington, DC: U.S. Government Printing Office. (Copy on 24 file in the SWCF as WPO39558.) 25

Wing, N. R., and G. W. Gee. 1994. "Quest for the Perfect Cap," Civil Engineering. Vol. 64, no. 26 27 10, 38-41. (Copy on file in the SWCF as WPO21158.)

FIGURES

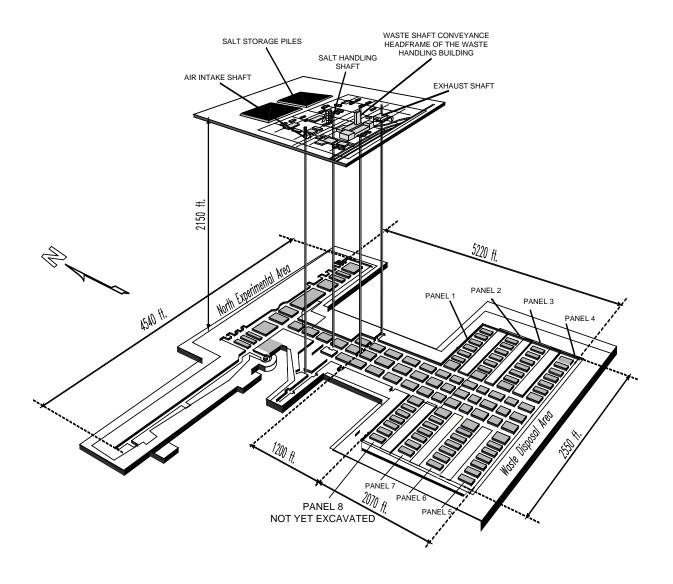


Figure G2-1 View of the WIPP Underground Facility

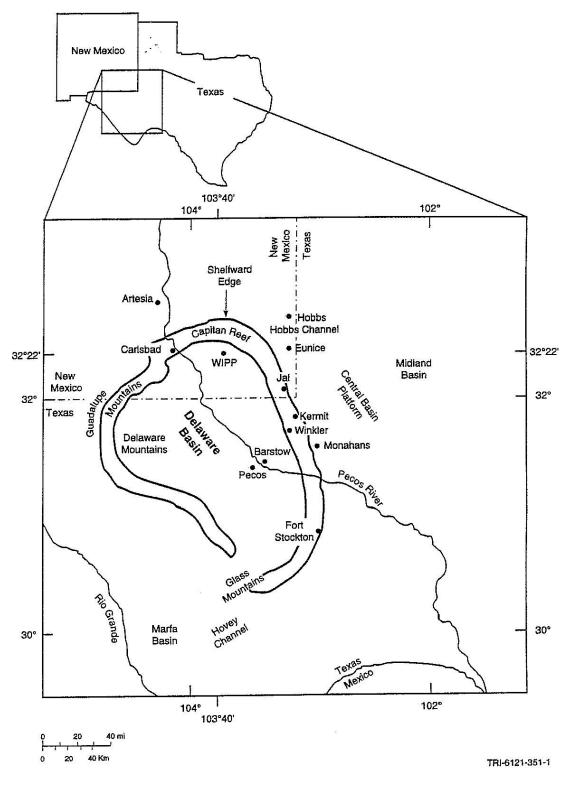


Figure G2-2 Location of the WIPP in the Delaware Basin

Erathem	System	Series	Lithostratigraphic Unit	Age Estimate (yr
	Quaternary	Holocene	Windblown sand	
		Pleistocene	Mescalero caliche	~500,000
			Gatuña Formation	~600,000
Cenozoic		2453 (and 1250 (a) (a)		
		Pliocene		
			Ogallala Formation	5.5 million
	Tertiary	Miocene		
				24 million
		Oligocene	Absent in southeastern	
		Eocene	New Mexico	
		Paleocene		
				66 million
	Cretaceous	Upper	Absent in southeastern	
		••	New Mexico	
		Lower	Detritus preserved	
				144 million
viesozoic	Jurassic		Absent in southeastern	
			New Mexico	
				208 million
	Triassic	Upper	Dockum Group	
		Lower	Absent in southeastern	
			New Mexico	
				245 million
2250		Ochoan	Dewey Lake Redbeds	
	Upper		Rustler Formation	
	11		Salado Formation	
			Castile Formation	
Paleozoic	Permian			
		Guadalupian	Capitan Limestone	
		•	and Bell Canyon	
			Formation	
	Lower			
		Leonardian	Bone Springs	
		Wolfcampian	Wolfcamp (informal)	
			 L. C. Martinez, Rose and Constant Quarter Science (2018) All the State of the State	286 million

Modified from Bachman, 1987

Figure G2-3 Chart Showing Major Stratigraphic Divisions, Southeastern New Mexico

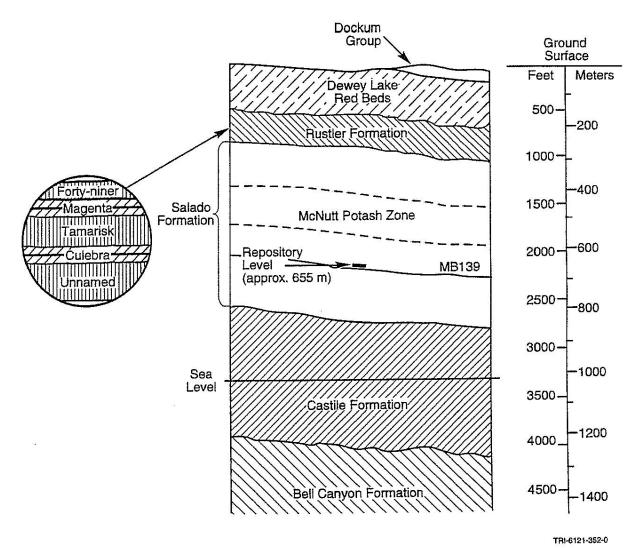


Figure G2-4 Generalized Stratigraphy of the WIPP Site Showing Repository Level

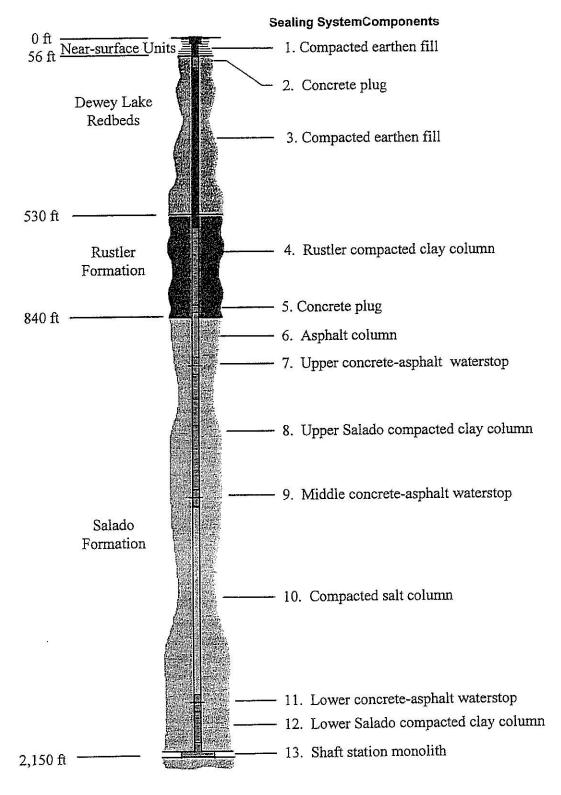


Figure G2-5 Arrangement of the Air Intake Shaft Sealing System

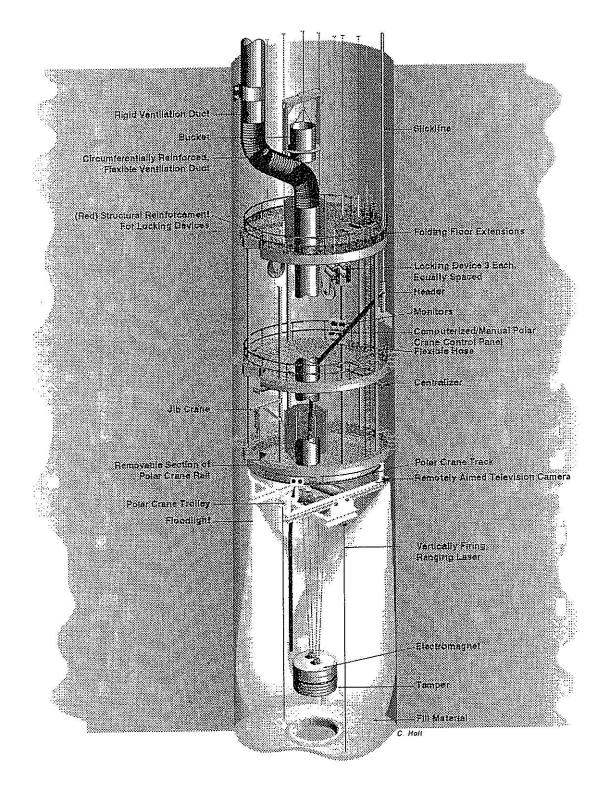


Figure G2-6 Multi-deck Stage Illustrating Dynamic Compaction

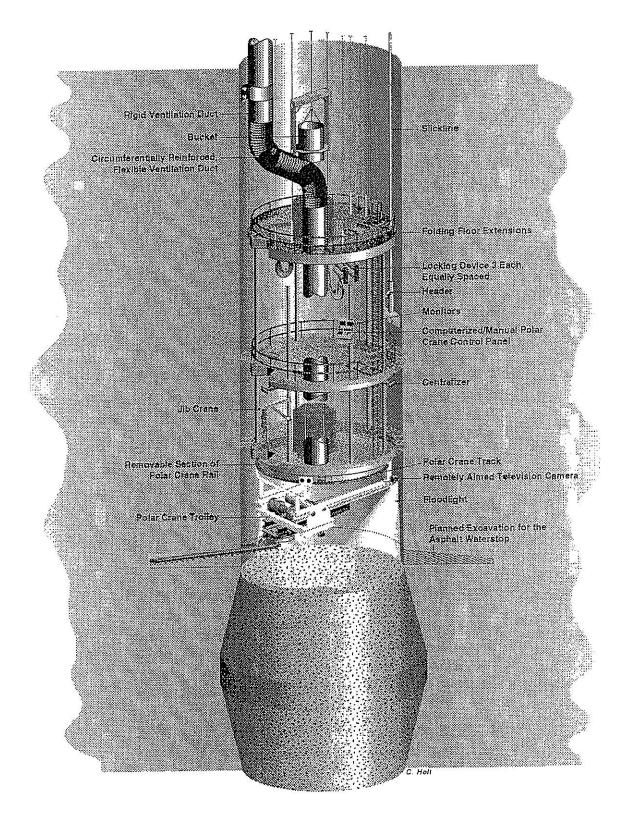
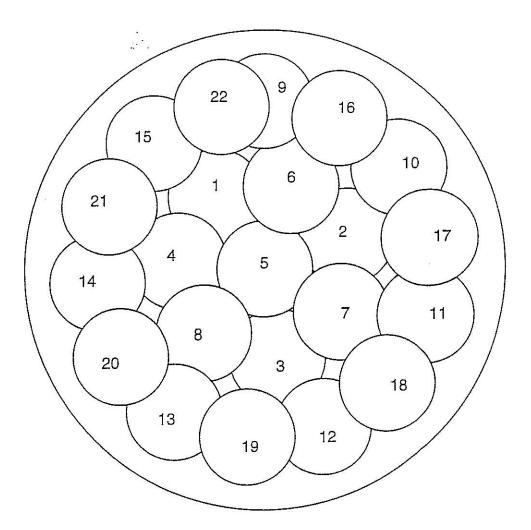
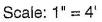


Figure G2-7 Multi-deck Stage Illustrating Excavation for Asphalt Waterstop





TRI-6121-376-0

Figure G2-8 Drop Pattern for 6-m-Diameter Shaft Using a 1.2-m-Diameter Tamper

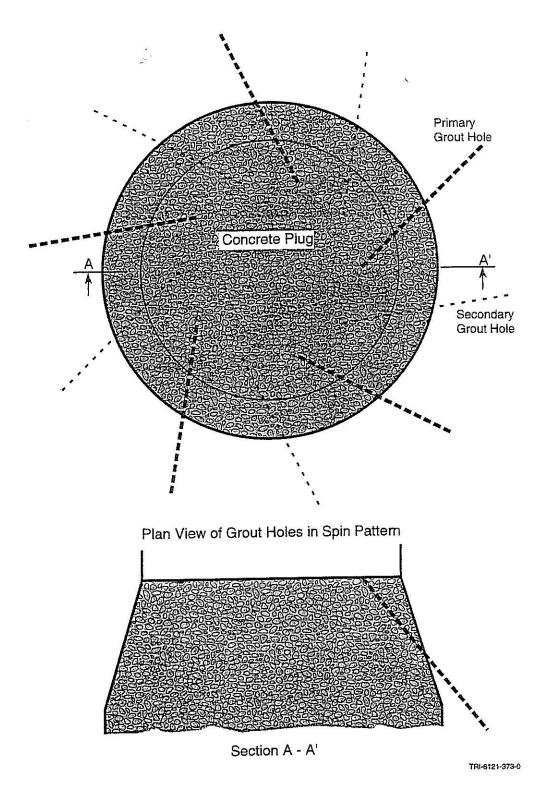
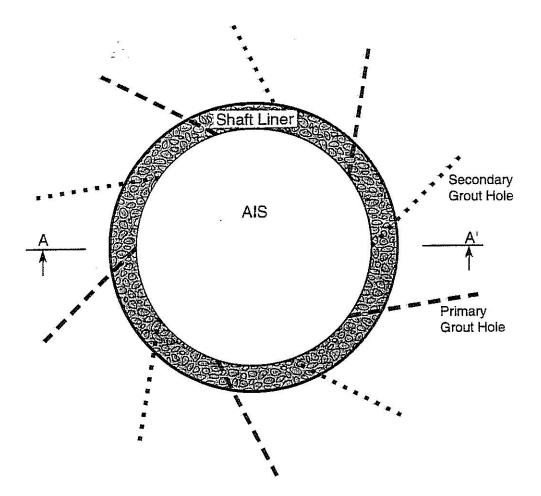
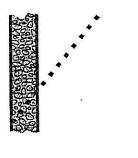


Figure G2-9 Plan and Section Views of Downward Spin Pattern of Grout Holes



Plan View of Grout Holes in Spin Pattern





Section A - A'

TRI-6121-374-0

Figure G2-10 Plan and Section Views of Upward Spin Pattern of Grout Holes

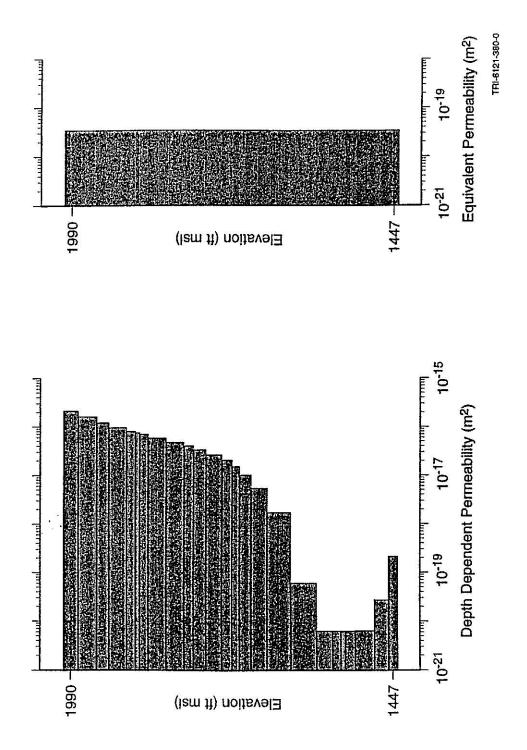


Figure G2-11 Example of Calculation of an Effective Salt Column Permeability from the Depth-Dependent Permeability at a Point in Time

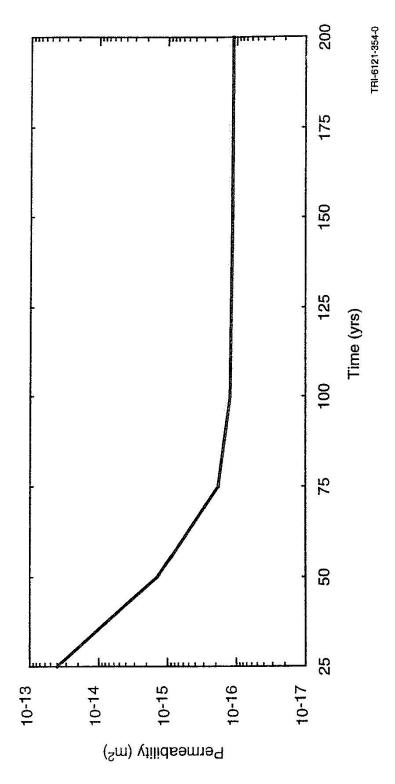


Figure G2-12 Effective Permeability of the Compacted Salt Column using the 95% Certainty Line

1

ATTACHMENT G2 APPENDIX A

MATERIAL SPECIFICATION

SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

ATTACHMENT G2 APPENDIX A

MATERIAL SPECIFICATION

SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

Appendix A Abstract

This appendix specifies material characteristics for shaft seal system components designed for the Waste Isolation Pilot Plant. The shaft seal system will not be constructed for decades; however, if it were to be constructed in the near term, materials specified here could be placed in the shaft and meet performance specifications. A material specification is necessary today to establish a frame of reference for design and analysis activities and to provide a basis for seal material parameters. This document was used by three integrated working groups: (1) the architect/engineer for development of construction methods and supporting infrastructure, (2) fluid flow and structural analysis personnel for evaluation of seal system adequacy, and (3) technical staff to develop probability distribution functions for use in performance assessment. The architect/engineers provide design drawings, construction methods and schedules as appendices to the final shaft seal system design report, called the Compliance Submittal Design Report (Permit Attachment G2). Similarly, analyses of structural aspects of the design and fluid flow calculations comprise other appendices to the final design report (not included in this Permit Attachment). These products together are produced to demonstrate the adequacy of the shaft seal system to independent reviewers, regulators, and stakeholders. It is recognized that actual placement of shaft seals is many years in the future, so design, planned construction method, and components will almost certainly change between now and the time that detailed construction specifications are prepared for the bidding process. Specifications provided here are likely to guide future work between now and the time of construction, perhaps benefiting from optimization studies, technological advancements, or experimental demonstrations.

TABLE OF CONTENTS

A1.	Introd	uction			4
	A1.1	Sealing	Strategy		6
	A1.2	Longevit	y		6
A2.	Mater	ial Specific	cations		
	A2.1	•			
		A2.1.1			
		A2.1.2		naracteristics	
		A2.1.3		on	
		A2.1.4		ce Requirements	
		A2.1.5		i Methods	
		/	A2.1.5.1	Fine Aggregate	
			A2.1.5.2	Coarse Aggregate	
			A2.1.5.3	Batch-Plant Control	
			A2.1.5.4	Concrete Products	
	A2.2	Compac	-		
		A2.2.1			
		A2.2.2		naracteristics	
		A2.2.3		on	
		A2.2.4		ce Requirements	
		A2.2.5		Methods	
	A2.3	Asphalt (
		A2.3.1	•		
		A2.3.2	Material Ch	naracteristics	
		A2.3.3	Constructio	on	21
		A2.3.4	Performanc	ce Requirements	22
		A2.3.5	Verification	Methods	23
	A2.4	Compac	ted Salt Colun	nn	23
		A2.4.1	Functions.		24
		A2.4.2	Material Ch	naracteristics	24
		A2.4.3	Constructio	on	25
		A2.4.4	Performanc	ce Requirements	25
		A2.4.5	Verification	Methods	
	A2.5	Cementi	tious Grout		27
		A2.5.1	Functions		27
		A2.5.2	Material Ch	naracteristics	27
		A2.5.3	Constructio	on	28
		A2.5.4	Performanc	ce Requirements	
		A2.5.5	Verification	Methods	
	A2.6	Earthen	Fill		
		A2.6.1			
		A2.6.2	Material Ch	naracteristics	29
		A2.6.3		on	
		A2.6.4		ce Requirements	
		A2.6.6	Verification	۱	29

A3.	Concluding Remarks	29
A4.	References	31

FIGURES

Figure

Title

Figure G2A-1	Schematic of the WIPP Shaft Seal Design
Figure G2A-2	Cumulative Distribution Function for SMC
Figure G2A-3	Sodium Bentonite Permeability Versus Density
Figure G2A-4	Cumulative Frequency Distribution for Compacted Bentonite
Figure G2A-5	Asphalt Permeability Cumulative Frequency Distribution Function
Figure G2A-6	Fractional Density of the Consolidating Salt Column
Figure G2A-7	Permeability of Consolidated Crushed Salt as a Function of Fractional
	Density
Figure G2A-8	Compacted Salt Column Permeability Cumulative Frequency Distribution
	Function at Seal Midpoint 100 Years Following Closure

TABLES

Table

Title

- Table A-1
 Concrete Mixture Proportions
- Table A-2Standard Specifications for Concrete Materials
- Table A-3Chemical Composition of Expansive Cement
- Table A-4
 Requirements for Salado Mass Concrete Aggregates
- Table A-5
 Target Properties for Salado Mass Concrete
- Table A-6Test Methods Used for Measuring Concrete Properties During and After
Mixing
- Table A-7
 Test Methods Used for Measuring Properties of Hardened Concrete
- Table A-8Representative Bentonite Composition.
- Table A-9
 Asphalt Component Specifications
- Table A-10Ultrafine Grout Mix Specification

1 A1. INTRODUCTION

This appendix provides a body of technical information for each of the WIPP shaft seal system 2 materials identified in the text of the Compliance Submittal Design Report (Permit Attachment 3 G2). This material specification characterizes each seal material, establishes why it will function 4 adequately, states briefly how each component will be placed, and quantifies expected 5 characteristics, particularly permeability, pertinent to a WIPP-specific shaft seal design. Each 6 material is first described from an engineering viewpoint, then appropriate properties are 7 summarized in tables and figures which emphasize permeability parameter distribution functions 8 used in performance calculations. Materials are discussed beyond limits normally found in 9 conventional construction specifications. Descriptive elements focus on stringent shaft seal 10 system requirements that are vital to regulatory compliance demonstration. Information normally 11 contained in an engineering performance specification is included because more than one 12 construction method, or even a completely different material, may function adequately. Content 13 that would eventually be included contractually in specifications for materials or specifications 14 for workmanship are not included in detail. The goal of these specifications is to substantiate 15 why materials used in this seal system design will limit fluid flow and thereby adequately limit 16 releases of hazardous constituents from the WIPP site at the point of compliance defined in 17 Permit Part 5 and limit releases of radionuclides at the regulatory boundary. 18 Figure G2A-1 is a schematic drawing of the proposed WIPP shaft sealing system. Design detail 19

and other characteristics of the geologic, hydrologic and chemical setting are provided in the 20 main body of Permit Attachment G2, other appendices, and references. The four shafts will be 21 entirely filled with dense materials possessing low permeability and other desirable engineering 22 and economic attributes. Seal materials include concrete, clay, asphalt, and compacted salt. 23 Other construction and fill materials include cementitious grout and earthen fill. The level of 24 detail included for each material, and the emphasis of detail, vary among the materials. 25 Concrete, clay, and asphalt are common construction materials used extensively in hydrologic 26 applications. Their descriptions will be rather complete, and performance expectations will be 27 drawn from the literature and site-specific references. Portland cement concrete is the most 28 common structural material being proposed for the WIPP shaft seal system and its use has a 29 long history. Considerable specific detail is provided for concrete because it is salt-saturated. 30 Clay is used extensively in the seal system. Clay is often specified in industry as a construction 31 material, and bentonitic clay has been widely specified as a low permeability liner for hazardous 32 waste sites. Therefore, a considerable body of information is available for clay materials, 33 particularly bentonite. Asphalt is a widely used paving and waterproofing material, so its 34 specification here reflects industry practice. It has been used to seal shaft linings as a filler 35 between the concrete and the surrounding rock, but has not been used as a full shaft seal 36 component. Compaction and natural reconsolidation of crushed salt are uniquely applied here. 37 Therefore, the crushed salt specification provides additional information on its constitutive 38 behavior and sealing performance. Cementitious grout is also specified in some detail because 39 it has been developed and tested for WIPP-specific applications and similar international waste 40 41 programs. Earthen fill will be given only cursory specifications here because it has little impact on the shaft seal performance and placement to nominal standards is easily attained. 42

Discussion of each material is divided into sections, which are described in the annotated
 bullets below:

1 Functions

2 A general summary of functions of specific seal components is presented. Each seal component

- 3 must function within a natural setting, so design considerations embrace naturally occurring
- 4 characteristics of the surrounding rock.

5 Material Characteristics

6 Constitution of the seal material is described and key physical, chemical, mechanical,

7 hydrological, and thermal features are discussed.

8 Construction

A brief mention is made regarding construction, which is more thoroughly treated in Appendix B
 of the *Compliance Submittal Design Report* (Permit Attachment G2, Appendix B). Construction,
 as discussed in this section, is primarily concerned with proper placement of materials. A viable
 construction procedure that will attain placement specifications is identified, but such a
 specification does not preclude other potential methods from use when the seal system is
 eventually constructed.

15 Performance Requirements

Regulations to which the WIPP must comply do not provide quantitative specifications 16 applicable to seal design. Performance of the WIPP repository is judged against performance 17 standards for miscellaneous units specified in 20.4.1.500 NMAC (incorporating 40 CFR 18 §264.601) for releases of hazardous constituents at the point of compliance defined in Permit 19 Part 5. Performance is also judged against potential releases of radionuclides at the regulatory 20 boundary, which is a probabilistic calculation. To this end, probability distribution functions for 21 permeabilities (referred to as PDFs) of each material have been derived for performance 22 assessment of the WIPP system and are included within this subsection on performance 23 requirements. 24

25 Verification Methods

26 It must be assured that seal materials placed in the shaft meet specifications. Both design and selection of materials reflect this principal concern. Assurance is provided by quality control 27 procedures, quality assurance protocol, real-time testing, demonstrations of technology before 28 construction, and personnel training. Materials and construction procedures are kept relatively 29 simple, which creates robustness within the overall system. In addition, elements of the seal 30 system often are extensive in length, and construction will require years to complete. If atypical 31 placement of materials is detected, corrections can be implemented without impacting 32 performance. These specifications limit in situ testing of seal material as it is constructed 33 although, if it is later determined to be desirable, certain in situ tests can be amended in 34 construction specifications. Invasive testing has the potential to compromise the material, add 35 cost, and create logistic and safety problems. Conventional specifications are made for property 36 testing and quality control. 37

1 References

These specifications draw on a wealth of information available for each material. Reference to literature values, existing data, anecdotal information, similar applications, laboratory and field testing, and other applicable supportive documentation is made.

5 A1.1 Sealing Strategy

⁶ The shaft seal system design is an integral part of compliance with 20.4.1.500 NMAC

7 (incorporating 40 CFR §264) and 40 CFR §191. The EPA has also promulgated 40 CFR §194,

8 entitled "Criteria for the Certification and Re-certification of the Waste Isolation Pilot Plant's

9 Compliance with the 40 CFR Part 191," to which this design and these specifications are

responsive. Other seal design requirements, such as State of New Mexico regulations, apply to

11 stratigraphy above the Salado.

Compliance of the site with 20.4.1.500 NMAC (incorporating 40 CFR §264) and 40 CFR §191 12 will be determined in part by the ability of the seal system to limit migration of hazardous 13 constituents to the point of compliance defined in Permit Part 5, and migration of radionuclides 14 to the regulatory boundary. Both natural and engineered barriers may combine to form the 15 isolation system, with the shaft seal system forming an engineered barrier in a natural setting. 16 Seal system materials possess high durability and compatibility with the host rock. All materials 17 used in the shaft seal system are expected to maintain their integrity for very long periods. The 18 system contains functional redundancy and uses differing materials to reduce uncertainty in 19 performance. Some sealing components are used to retard fluid flow soon after placement, 20 while other components are designed to function well beyond the regulatory period. 21 International programs engaged in research and demonstration of sealant technology provide 22 significant information on longevity of materials similar to those proposed for this shaft seal 23 system (Gray, 1993). When this information is applied to the setting and context of the WIPP, 24 there is strong evidence that the materials specified will maintain their positive attributes for 25 defensibly long periods. 26

27 A1.2 Longevity

28 Longevity of materials is considered within the site geologic and hydrologic setting as summarized in the main body of this report (Permit Attachment G2) and described in the Seal 29 System Design Report (DOE, 1995). A major environmental advantage of the WIPP locality is 30 an overall lack of groundwater to seal against. In terms of sealing the WIPP site, the 31 stratigraphy can be conveniently divided into the Salado Formation and the superincumbent 32 formations comprising primarily the Rustler Formation and the Dewey Lake Redbeds. The 33 Salado Formation, composed mainly of evaporite sequences dominated by halite, is nearly 34 impermeable. Transmissivity of engineering importance in the Salado Formation is lateral along 35 anhydrite interbeds, basal clays, and fractured zones near underground openings. Neither the 36 Dewey Lake Redbeds nor the Rustler Formation contains regionally productive sources of 37 water, although seepage near the surface in the Exhaust Shaft has been observed. Permeability 38 of materials placed in the Salado below the contact with the Rustler, and their effects on the 39 surrounding disturbed rock zone, are the primary engineering properties of concern. Even 40 though very little regional water is present in the geologic setting, the seal system reflects great 41 concern for groundwater's potential influence on materials comprising the shaft seal system. 42

1 Shaft seal materials have been selected in part because of their exceptional durability.

- 2 However, it is recognized that brine chemistry *could* impact engineered materials if conditions
- 3 permitted. Highly concentrated saline solutions can, under severe circumstances, affect
- 4 performance of cementitious materials and clay. Concrete has been shown to degrade under
- 5 certain conditions, and clays can be more transmissive to brine than to potable water. Asphalt
- 6 and compacted salt are essentially chemically inert to brine. Although stable in naturally
- 7 occurring seeps such as those in the Santa Barbara Channel (California), asphalt can degrade
- 8 when subjected to ultraviolet light or through microbial activity. Brine would not chemically
- 9 change the compacted salt column, but mechanical effects of pore pressure are of concern to
- reconsolidation. Mechanical influences of brine on the reconsolidating salt column are
- discussed in Sections 7 and 8 of the main report (Permit Attachment G2), which summarize Appendices D and C, respectively (Appendices C and D are not included in the Permit, but are
- Appendices D and C, respectively (Appendices C and D are not included in the Permit, but are contained in *Waste Isolation Pilot Plant Shaft Sealing System Compliance Submittal Design*
- 14 Report ("Compliance Submittal Design Report") (Sandia, 1996)).

Because of limited volumes of brine, low hydraulic gradients, and low permeability materials, the 15 geochemical setting will have little influence on shaft seal materials. Each material is durable, 16 though the potential exists for degradation or alteration under extreme conditions. For example, 17 the three major components of portland cement concrete, portlandite (Ca $(OH)_{2}$), calcium-18 aluminate-hydrate (CAH) and calcium-silicate-hydrate (CSH), are not thermodynamically 19 compatible with WIPP brines. If large quantities of high ionic strength brine were available and 20 transport of mass was possible, degradation of cementitious phases would certainly occur. Such 21 a localized phenomenon was observed on a construction joint in the liner of the Waste Handling 22 Shaft at the WIPP site. Within the shaft seal system, however, the hydrologic setting does not 23 support such a scenario. Locally brine will undoubtedly contact the surface of mass placements 24 of concrete. A low hydrologic gradient will limit mass transport, although degradation of paste 25 constituents is expected where brine contacts concrete. 26

Among longevity concerns, degradation of concrete is the most recognized. At this stage of the 27 design, it is established that only small volumes of brine ever reach the concrete elements (see 28 Section 8). Further analysis concerned with borehole plugging using cementitious materials 29 shows that at least 100 pore volumes of brine in an open system would be needed to begin 30 degradation processes. In a closed system, such as the hydrologic setting in the WIPP shafts, 31 phase transformations create a degradation product of increased volume. Net volume increase 32 owing to phase transformation in the absence of mass transport would decrease rather than 33 increase permeability of concrete seal elements. 34

Mechanical and chemical stability of clays, in this case the emphasis is on bentonitic clay, is 35 particularly favorable in the WIPP geochemical and hydrological environment. A compendium of 36 recent work associated with the Stripa project in Sweden (Gray, 1993) provides field-scale 37 testing results, supportive laboratory experimental data, and thermodynamic modeling that lead 38 to a conclusion that negligible transformation of the bentonite structure will occur over the 39 regulatory period of the WIPP. In fact, very little brine penetration into clay components is 40 expected, based on intermediate-scale experiments at WIPP. Any wetting of bentonite will result 41 in development of swelling pressure, a favorable situation that would accelerate return to a 42 uniform stress state within the clay component. 43

Natural bentonite is a stable material that generally will not change significantly over a period of
 ten thousand years. Bentonitic clays have been widely used in field and laboratory experiments
 concerned with radioactive waste disposal. As noted by Gray (1993), three internal

1 mechanisms, illitization, silicification and charge change, could affect sealing properties of

2 bentonite. Illitization and silicification are thermally driven processes and, following discussion

by Gray (1993), are not possible in the environment or time-frame of concern at the WIPP. The

4 naturally occurring Wyoming bentonite which is the specified material for the WIPP shaft seal is

5 well over a million years old. It is, therefore, highly unlikely that metamorphism of bentonite

6 enters as a design concern.

Asphalt has existed for thousands of years as natural seeps. Longevity studies specific to
DOE's Hanford site have utilized asphalt artifacts buried in ancient ceremonies to assess longterm stability (Wing and Gee, 1994). Asphalt used as a seal component deep in the shaft will
inhabit a benign environment, devoid of ultraviolet light or an oxidizing atmosphere. Additional
assurance against possible microbial degradation in asphalt elements is mitigated with addition
of lime. For these reasons, it is thought that design characteristics of asphalt components will
endure well beyond the regulatory period.

14 Materials being used to form the shaft seals are the same as those being suggested in the scientific and engineering literature as appropriate for sealing deep geologic repositories for 15 radioactive wastes. This fact was noted during independent technical review. Durability or 16 longevity of seal components is a primary concern for any long-term isolation system. Issues of 17 possible degradation have been studied throughout the international community and within 18 waste isolation programs in the USA. Specific degradation studies are not detailed in this 19 document because longevity is one of the over-riding attributes of the materials selected and 20 degradation is not perceived to be likely. However, it is acknowledged here that microbial 21 degradation, seal material interaction, mineral transformation, such as silicification of bentonite, 22 and effects of a thermal pulse from asphalt or hydrating concrete remain areas of continued 23 studv. 24

25 A2. MATERIAL SPECIFICATIONS

The WIPP shaft seal system plays an important role in meeting regulatory requirements such as 26 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR 191. A 27 combination of available, durable materials which can be emplaced with low permeability is 28 proposed as the seal system. Components include mass concrete, asphalt waterstops 29 sandwiched between concrete plugs, a column of asphalt, long columns of compacted clay, and 30 a column of compacted crushed WIPP salt. The design is based on common materials and 31 construction technologies that could be implemented using today's technology. In choosing 32 materials, emphasis was given to permeability characteristics and mechanical properties. The 33 function, constitution, construction, performance, and verification of each material are given in 34 the following sections. 35

36 A2.1 Mass Concrete

Concrete has exceptionally low permeability and is widely used for hydraulic applications such as water storage tanks, water and sewer systems, and massive dams. Salt-saturated concrete has been used successfully as a seal material in potash and salt mining applications. Upon hydration, unfractured concrete is nearly impermeable, having a permeability less than 10⁻²⁰ m². In addition, concrete is a primary structural material used for compression members in countless applications. Use of concrete as a shaft seal component takes advantage of its many attributes and the extensive documentation of its use. 1 This specification for mass concrete will discuss a special design mixture of a salt-saturated

2 concrete called Salado Mass Concrete or SMC (Wakeley et al., 1995). Performance of SMC

and similar salt-saturated mixtures is established and will be completely adequate for concrete

4 applications within the WIPP shafts. Because concrete is such a widely used material, it has

5 been written into specifications many times. Therefore, the specification for SMC contains

6 recognized standard practices, established test methods, quality controls, and other details that

7 are not available at a similar level for other seal materials. Use of salt-saturated concrete,

8 especially SMC, is backed by extensive laboratory and field studies that establish performance

9 characteristics far exceeding requirements of the WIPP shaft seal system.

10 **A2.1.1 Functions**

11 The function of the concrete is to provide a durable component with small void volume,

adequate structural compressive strength, and low permeability. Concrete components appear

13 within the shaft seal system at the very bottom, the very top, and several locations in between

where they provide a massive plug that fills the opening and a tight interface between the plug

and host rock. In addition, concrete is a rigid material that will support overlying seal

16 components while promoting natural healing processes within the salt disturbed rock zone (the

17 DRZ is discussed further in Appendix D of the Compliance Submittal Design Report (Sandia,

18 **1996)).**

¹⁹ Concrete is one of the redundant components that protects the reconsolidating salt column.

20 Since the salt column will achieve low permeabilities in fewer than 100 years (see Section 2.4.4

of this specification), concrete would no longer be needed after that time. For purposes of

22 performance assessment calculations, a change in concrete permeability to degraded values is

²³ "allowed" to occur. However, concrete within the Salado Formation is likely to endure throughout

the regulatory period with sustained engineering properties.

All concrete sealing elements, with the exception of a possible concrete cap, are unreinforced.

In conventional civil engineering design, reinforcement is used to resist tensile stresses since

concrete is weak in tension and reinforcement bar (rebar) balances tensile stresses in the steel

with compressive stresses in concrete. However, concrete has exceptional compressive

strength, and all the states of stress within the shaft will be dominated by compressive stress.
 Mass concrete, by definition, is related to any volume of concrete where heat of hydration is a

Mass concrete, by definition, is related to any volume of concrete where heat of hydration i design concern. SMC is tailored to minimize heat of hydration and overall differential

temperature. An analysis of hydration heat distribution is included in Appendix D of the

Compliance Submittal Design Report (Sandia, 1996). Boundary conditions are favorable for

reducing any possible thermally induced tensile cracking during the hydration process.

35 A2.1.2 Material Characteristics

36 Salt-saturated concrete contains sufficient salt as an aggregate to saturate hydration water with

respect to NaCl. Salt-saturated concrete is required for all uses within the Salado Formation

38 because fresh water concrete would dissolve part of the host rock. Dissolution would cause a

³⁹ poor bond and perhaps a more porous interface, at least initially.

⁴⁰ Dry materials for SMC include cementitious materials, fine and coarse aggregates, and sodium

chloride. Concrete mixture proportions of materials for one cubic yard of concrete appear in

42 Table A-1.

Table A-1Concrete Mixture Proportions

Material	lb/yd³
Portland cement	278
Class F fly ash	207
Expansive cement	134
Fine aggregate	1292
Coarse aggregate	1592
Sodium chloride	88
Water	225

 $kg/m^3 = (lb/yd^3) * (0.59)$. Water: Cement Ratio is weight of water divided by all cementitious materials.

- 3 Table A-2 is a summary of standard specifications for concrete materials. Further discussion of
- 4 each specification is presented in subsequent text, where additional specifications pertinent to
- 5 particular concrete components are also given.
- 6 7

1

2

 Table A-2

 Standard Specifications for Concrete Materials

Material	Applicable Standard Tests and Specifications	Comments
Class H oilwell cement	American Petroleum Institute Specification 10	Chemical composition determined according to ASTM C 114
Class F fly ash	ASTM C 618, Standard Specification for Fly Ash	Composition and properties determined according to ASTM C 311
Expansive cement	Similar to ASTM C 845	Composition determined according to ASTM C 114
Salt	ASTM E 534, Chemical Analysis of Sodium Chloride	Batched as dry ingredient, not as an admixture
Coarse and fine aggregates	ASTM C 33, Standard Specification for Concrete Aggregates; ASTM C 294 and C 295 also applied	Moisture content determined by ASTM C 566

- 8 Portland cement shall conform to American Petroleum Institute (API) Specification 10 Class G
- 9 or Class H. Additional requirements for the cement are that the fineness as determined

according to ASTM C 204 shall not exceed 300 m²/kg, and the cement must meet the

- requirement in ASTM C 150 for moderate heat of hydration.
- Fly Ash shall conform to ASTM C 618, Class F, with the additional requirement that the percentage of Ca cannot exceed 10 %.

14 **Expansive cement** for shrinkage-compensation shall have properties so that, when used with

- portland cement, the resulting blend is shrinkage compensating by the mechanism described in
- 16 ASTM C 845 for Type K cement. Additional requirements for chemical composition of the
- 17 shrinkage compensating cement appear in Table A-3.

 Table A-3

 Chemical Composition of Expansive Cement

Chemical composition	Weight %
Magnesium oxide, max	1.0
Calcium oxide, min	38.0
Sulfur trioxide, max	28.0
Aluminum trioxide (AL ₂ O ₃), min	7.0
Silicon dioxide, min	7.0
Insoluble residue, max	1.0
Loss on ignition, max	12.0

3 **Sodium Chloride** shall be of a technical grade consisting of a minimum of 99.0 % sodium

chloride as determined according to ASTM E 534, and shall have a maximum particle size of
 600 μm.

Aggregate proportions are reported here on saturated surface-dry basis. Specific gravity of 6 coarse and fine aggregates used in these proportions were 2.55 and 2.58, respectively. 7 Absorptions used in calculations were 2.25 (coarse) and 0.63 (fine) % by mass. Concrete 8 mixture proportions will be adjusted to accommodate variations in the materials selected, 9 especially differences in specific gravity and absorptions of aggregates. Fine aggregate shall 10 consist of natural silica sand. Coarse aggregate shall consist of gravel. The quantity of flat and 11 elongated particles in the separate size groups of coarse aggregates, as determined by ASTM 12 D 4791, using a value of 3 for width-thickness ratio and length-width ratio, shall not exceed 25 13 % in any size group. Moisture in the fine and coarse aggregate shall not exceed 0.1 % when 14 determined in accordance with ASTM C 566. Aggregates shall meet the requirements listed in 15 Table A-4. 16

17 A2.1.3 Construction

Construction techniques include surface preparation of mass concrete and slickline (a drop pipe 18 from the surface) placement at depth within the shaft. A batching and mixing operation on the 19 surface will produce a wet mixture having initial temperatures not exceeding 20°C. Placement 20 uses a tremie line, where the fresh concrete exits the slickline below the surface level of the 21 concrete being placed. This procedure will minimize entrained air. Placement requires no 22 vibration and, except for the large concrete monolith at the base of each shaft, no form work. No 23 special curing is required for the concrete because its natural environment ensures retention of 24 humidity and excellent hydration conditions. It is desired that each concrete pour be continuous, 25 with the complete volume of each component placed without construction joints. However, no 26 perceivable reduction in performance is anticipated if, for any reason, concrete placement is 27 interrupted. A free face or cold joint could allow lateral flow but would remain perpendicular to 28 flow down the shaft. Further discussion of concrete construction is presented in Permit 29 Attachment G2, Appendix B. 30

1 2

 Table A-4

 Requirements for Salado Mass Concrete Aggregates

Property	Fine Aggregate	Coarse Aggregate
Specific Gravity (ASTM C 127, ASTM C 128)	2.65, max	2.80, max
Absorption (ASTM C 127, ASTM C 128)	1.5 percent, max	3.5 percent, max
Clay Lumps and Friable Particles (ASTM C 142)	3.0 percent, max	3.0 percent, max
Material Finer than 75-µm (No. 200) Sieve (ASTM C 117)	3.0 percent, max	1.0 percent, max
Organic Impurities (ASTM C 40)	No. 3, max	N/A
L.A. Abrasion (ASTM C 131, ASTM C 535)	N/A	50 percent, max
Petrographic Examination (ASTM C 295)	Carbonate mineral aggregates shall not be used	Carbonate rock aggregates shall not be used
Coal and Lignite, less than 2.00 specific gravity (ASTM C 123)	0.5 percent, max	0.5 percent, max

3 A2.1.4 Performance Requirements

Specifications of concrete properties include characteristics in the green state as well as the 4 5 hardened state. Properties of hydrated concrete include conventional mechanical properties and projections of permeabilities over hundreds of years, a topic discussed at the end of this section. 6 Table A-5 summarizes target properties for SMC. Attainment of these characteristics has been 7 demonstrated (Wakeley et al., 1995). SMC has a strength of about 40 MPa at 28 days and 8 continues to gain strength after that time, as is typical of hydrating cementitious materials. 9 Concrete strength is naturally much greater than required for shaft seal elements because the 10 state of stress within the shafts is compressional with little shear stress developing. In addition, 11 compressive strength of SMC increases as confining pressure increases (Pfeifle et al., 1996). 12 Volume stability of the SMC is also excellent, which assures a good bond with the salt. 13 Thermal and constitutive models for the SMC are described in Appendix D of the Compliance 14 Submittal Design Report (Sandia, 1996). Thermal properties are fit to laboratory data and used 15 to calculate heat distribution during hydration. An isothermal creep law and an increasing 16 modulus are used to represent the concrete in structural calculations. The resistance 17

established by concrete to inward creep of the Salado Formation accelerates healing of

¹⁹ microcracks in the salt. The state of stress impinging on concrete elements within the Salado

20 Formation will approach a lithostatic condition.

21

Table A-5Target Properties for Salado Mass Concrete

Property	Comment
Initial slump 10 ± 1.0 in. Slump at 2 hr 8 ± 1.5 in.	ASTM C 143, high slump needed for pumping and placement
Initial temperature ≤ 20°C	ASTM C 1064, using ice as part of mixing water
Air content ≤ 2.0%	ASTM C 231 (Type B meter), tight microstructure and higher strength
Self-leveling	Restrictions on underground placement may preclude vibration
No separately batched admixtures	Simple and reproducible operations
Adiabatic temperature rise ≤ 16°C at 28 days	To reduce thermally induced cracking
30 MPa (4500 psi) compressive strength	ASTM C 39, at 180 days after placement
Volume stability	ASTM C 157, length change between +0.05 and -0.02% through 180 days

³ Permeability of SMC is very low, consistent with most concretes. Owing to a favorable state of

4 stress and isothermal conditions, the SMC will remain intact. Because little brine is available to

⁵ alter concrete elements, minimal degradation is possible. Resistance to phase changes of salt-

6 saturated concretes and mortars within the WIPP setting has been excellent. These favorable

7 attributes combine to assure concrete elements within the Salado will remain structurally sound

8 and possess very low permeability for exceedingly long periods.

Permeabilities of SMC and other salt-saturated concretes have been measured in Small-Scale
Seal Performance Tests (SSSPT) and Plug Test Matrix (PTM) at the WIPP for a decade and
are corroborated by laboratory measurements (e.g., Knowles and Howard, 1996; Pfeifle et al.,
1996). From these tests, values and ranges of concrete permeability have been developed. For
performance assessments calculations, permeability of SMC seal components is treated as a
random variable defined by a log triangular distribution with a best estimator of 1.78×10⁻¹⁹ m²
and lower and upper limits of 2.0×10⁻²¹ and 1.0×10⁻¹⁷ m², respectively.

16 The probability distribution function is shown in Figure G2A-2. Further, it is recognized that

17 concrete function is required for only a relatively short-term period as salt reconsolidates.

18 Concrete is expected to function adequately beyond its design life. For calculational expediency,

a higher, very conservative permeability of 1.0×10^{-14} is assigned to concrete after 400 years.

20 This abrupt change in permeability does not imply degradation, but rather reflects system

redundancy and the fact that concrete is no longer relied on as a seal component.

22 A2.1.5 Verification Methods

The concrete supplier shall perform the inspection and tests described below (Tables A-6 and A-7) and, based on the results of these inspections and tests, shall take appropriate action. The laboratory performing verification tests shall be on-site and shall conform with ASTM C 1077. Individuals who sample and test concrete or the constituents of concrete as required in this specification shall have demonstrated a knowledge and ability to perform the necessary test procedures equivalent to the ACI minimum guidelines for certification of Concrete Laboratory Testing Technicians, Grade I. The Buyer will inspect the laboratory, equipment, and test 1 procedures for conformance with ASTM C 1077 prior to start of dry materials batching

- 2 operations and prior to restarting operations.
- 3 A2.1.5.1 Fine Aggregate

4 (*A*) *Grading*. Dry materials will be sampled while the batch plant is operating; there shall be a 5 sieve analysis and fineness modulus determination in accordance with ASTM C 136.

(B) Fineness Modulus Control Chart. Results for fineness modulus shall be grouped in sets of
 three consecutive tests, and the average and range of each group shall be plotted on a control
 chart. The upper and lower control limits for average shall be drawn 0.10 units above and below
 the target fineness modulus, and the upper control limit for range shall be 0.20 units above the
 target fineness modulus.

11 12

 Table A-6

 Test Methods Used for Measuring Concrete Properties During and After Mixing

Property	Test Method	Title
Slump	ASTM C 143	Slump of Portland Cement Concrete
Unit weight	ASTM C 138	Unit Weight, Yield, and Air Content (Gravimetric) of Concrete
Air content	ASTM C 231	Air Content of Freshly Mixed Concrete by the Pressure Method
Mixture temperature	ASTM C 1064	Temperature of Freshly Mixed Concrete

13 14

 Table A-7

 Test Methods Used for Measuring Properties of Hardened Concrete

Property	Test Method	Title
Compressive strength	ASTM C 39	Compressive Strength of Cylindrical Concrete Specimens
Modulus of elasticity	ASTM C 469	Static Modulus of Elasticity and Poisson's Ratio of Concrete in Compression
Volume stability	ASTM C 157	Length Change of Hardened Cement Mortar and Concrete

(C) Corrective Action for Fine Aggregate Grading. When the amount passing any sieve is

outside the specification limits, the fine aggregate shall be immediately resampled and retested.

17 If there is another failure for any sieve, the fact shall be immediately reported to the Buyer.

18 Whenever a point on the fineness modulus control chart, either for average or range, is beyond

one of the control limits, the frequency of testing shall be doubled. If two consecutive points are

20 beyond the control limits, the process shall be stopped and stock discarded if necessary.

- (D) Moisture Content Testing. There shall be at least two tests for moisture content in
- accordance with ASTM C 566 during each 8-hour period of dry materials batch plant operation.
- 23 (E) Moisture Content Corrective Action. Whenever the moisture content of fine aggregate
- exceeds 0.1 % by weight, the fine aggregate shall be immediately resampled and retested. If
- there is another failure the batching shall be stopped.

1 A2.1.5.2 Coarse Aggregate

- 2 (A) Grading. Coarse aggregate shall be analyzed in accordance with ASTM C 136.
- 3 (B) Corrective Action for Grading. When the amount passing any sieve is outside the
- 4 specification limits, the coarse aggregate shall be immediately resampled and retested. If the
- 5 second sample fails on any sieve, that fact shall be reported to the Buyer. Where two
- 6 consecutive averages of five tests are outside specification limits, the dry materials batch plant
- 7 operation shall be stopped, and immediate steps shall be taken to correct the grading.
- (C) Moisture Content Testing. There shall be at least two tests for moisture content in
 accordance with ASTM C 566 during each 8-hour period of dry materials batch plant operation.
- accordance with Active 0.500 during cach o-hour period of dry materials batch plant operation.
- (D) Moisture Content Corrective Action. Whenever the moisture content of coarse aggregate
- exceed 0.1 % by weight, the coarse aggregate shall be immediately resampled and retested. If there is another failure, batching shall be stopped.

13 A2.1.5.3 Batch-Plant Control

The measurement of all constituent materials including cementitious materials, each size of aggregate, and granular sodium chloride shall be continuously controlled. The aggregate batch weights shall be adjusted as necessary to compensate for their nonsaturated surface-dry condition.

- 18 A2.1.5.4 Concrete Products
- Concrete products will be tested during preparation and after curing as summarized in Tables A 6 and A-7 for preparation and hydrated concrete, respectively.

21 A2.2 Compacted Clay

Compacted clays are commonly proposed as primary sealing materials for nuclear waste 22 repositories and have been extensively investigated (e.g., Gray, 1993). Compacted clay as a 23 shaft sealing component provides a barrier to brine and possibly to gas flow into or out of the 24 repository and supports the shaft with a high density material to minimize subsidence. In the 25 event that brine does contact the compacted clay columns, bentonitic clay can generate a 26 beneficial swelling pressure. Swelling would increase internal supporting pressure on the shaft 27 wall and accelerate healing of any disturbed rock zone. Wetted, swelling clay will seal fractures 28 as it expands into available space and will ensure tightness between the clay seal component 29 and the shaft walls. 30

31 **A2.2.1 Functions**

In general, clay is used to prevent fluid flow either down or up the shaft. In addition, clay will stabilize the shaft opening and provide a backstress within the Salado Formation that will enhance healing of microfractures in the disturbed rock. Bentonitic clays are specified for Components 4, 8, and 12. In addition to limiting brine migration down the shafts, a primary function of a compacted clay seal through the Rustler Formation (Component 4) is to provide separation of water bearing units. The primary function of the upper Salado clay column (Component 8) is to limit groundwater flow down the shaft, thereby adding assurance that the reconsolidating salt column is protected. The lower Salado compacted clay column (Component

2 12) will act as a barrier to brine and possibly to gas flow (see construction alternatives in

3 Appendix B) soon after placement and remain a barrier throughout the regulatory period.

4 A2.2.2 Material Characteristics

The Rustler and Salado compacted clay columns will be constructed of a commercial well-5 sealing grade sodium bentonite blocks compacted to between 1.8 and 2.0 g/cm³. An extensive 6 experimental data base exists for the permeability of sodium bentonites under a variety of 7 conditions. Many other properties of sodium bentonite, such as strength, stiffness, and chemical 8 stability also have been thoroughly investigated. Advantages of clavs for sealing purposes 9 include low permeability, demonstrated longevity in many types of natural environments, 10 deformability, sorptive capacity, and demonstrated successful utilization in practice for a variety 11 of sealing purposes. 12

A variety of clays could be considered for WIPP sealing purposes. For WIPP, as for most if not all nuclear waste repository projects, bentonite has been and continues to be a prime candidate as the clay sealing material. Bentonite clay is chosen here because of its overwhelming positive sealing characteristics. Bentonite is a highly plastic swelling clay material (e.g., Mitchell, 1993), consisting predominantly of smectite minerals (e.g., IAEA, 1990). Montmorillonite, the predominant smectite mineral in most bentonites, has the typical plate-like structure characteristic of most clay minerals.

The composition of a typical commercially available sodium bentonite (e.g. Volclay, granular 20 sodium bentonite) contains over 90% montmorillonite and small portions of feldspar, biotite, 21 selenite, etc. A typical sodium bentonite has the chemical composition summarized in Table A-8 22 (American Colloid Company, 1995). This chemical composition is close to that reported for MX-23 80 which was used successfully in the Stripa experiments (Gray, 1993). Sodium bentonite has a 24 tri-layer expanding mineral structure of approximately (AI Fe_{1.67} Mg_{0.33}) Si₄O₁₀ (OH₂) 25 Na⁺Ca⁺⁺_{0.33}. Specific gravity of the sodium bentonite is about 2.5. The dry bulk density of 26 granular bentonite is about 1.04 g/cm³. 27

Densely compacted bentonite (of the order of 1.75 g/cm³), when confined, can generate a 28 swelling pressure up to 20 MPa when permeated by water (IAEA, 1990). The magnitude of the 29 swelling pressure generated depends on the chemistry of the permeating water. Laboratory and 30 field measurements suggest that the bentonite specified for shaft seal materials in the Salado 31 may achieve swell pressures of 3 to 4 MPa, and likely substantially less. Swelling pressure in 32 the bentonite column is not expected to be appreciable because little contact with brine fluids is 33 conceivable. Further considerations of potential swelling of bentonite within the Rustler 34 Formation may be appropriate, however. 35

 Table A-8

 Representative Bentonite Composition.

Chemical Compound	Weight %
SiO ₂	63.0
Al ₂ O ₃	21.1
Fe ₂ O ₃	3.0
FeO	0.4
MgO	2.7
Na ₂ O	2.6
CaO	0.7
H ₂ O	5.6
Trace Elements	0.7

3 Mixtures of bentonite and water can range in rheological characteristics from a virtually

4 Newtonian fluid to a stiff solid, depending on water content. Bentonite can form stiff seals at low

5 moisture content, and can penetrate fractures and cracks when it has a higher water content.

6 Under the latter conditions it can fill void space in the seal itself and disturbed rock zones.

7 Bentonite with dry density of 1.75 g/cm³ has a cohesion of 5-50 kPa, and a friction angle of 5 to

8 15° (IAEA, 1990). At density greater than 1.6-1.7 g/cm³, swelling pressure of bentonite is less

⁹ affected by the salinity of groundwater providing better chemical and physical stabilities.

10 A2.2.3 Construction

Seal performance within the Salado Formation is far more important to regulatory compliance 11 than is performance of earthen fill in the overlying formations. Three potential construction 12 methods might be used to place clay in the shaft, as discussed in Appendix B. Construction of 13 bentonite clay components specifies block assembly procedures demonstrated successfully at 14 the WIPP site (Knowles and Howard, 1996) and in a considerable body of work by Roland 15 Pusch (see summary in Gray, 1993). To achieve low permeabilities, dry density of the bentonite 16 blocks should be about 2.0 g/cm³, although a range of densities is discussed in Section 2.2.4. A 17 high density of clay components is also desirable to carry the weight of overlying seal material 18

19 effectively and to minimize subsidence.

Placement of clay in the shaft is one area of construction that might be made more cost and 20 time effective through optimization studies. An option to construct clay columns using dynamic 21 compaction will likely prove to be efficient, so it is specified for earthen fill in the Dewey Lake 22 Redbeds (as discussed later) and may prove to be an acceptable placement method for other 23 components. Dynamic compaction would use equipment developed for placement of crushed 24 salt. The Canadian nuclear waste program has conducted extensive testing, both in situ and in 25 large scale laboratory compaction of clay-based barrier materials with dynamic hydraulically 26 powered impact hammers (e.g., Kjartanson et al, 1992). The Swedish program similarly has 27 investigated field compaction of bentonite-based tunnel backfill by means of plate vibrators 28 (e.g., Nilsson, 1985). Both studies demonstrated the feasibility of in situ compaction of 29 bentonite-based materials to a high density. Near surface, conventional compaction methods 30

will be used because insufficient space remains for dynamic compaction using the multi-deck
 work stage.

3 A2.2.4 Performance Requirements

The proven characteristics of bentonite assure attainment of very low permeability seals. It is 4 recognized that the local environment contributes to the behavior of compacted clay 5 components. Long-term material stability is a highly desired sealing attribute. Clay components 6 located in brine environments will have to resist cation exchange and material structure 7 alteration. Clay is geochemically mature, reducing likelihood of alteration and imbibition of brine 8 is limited to isolated areas. Compacted clav is designed to withstand possible pressure 9 gradients and to resist erosion and channeling that could conceivably lead to groundwater flow 10 through the seal. Compacted clay seal components support the shaft walls and promote healing 11 of the salt DRZ. Volume expansion or swelling would accelerate healing in the salt. A barrier to 12 gas flow could be constructed if moisture content of approximately 85% of saturation could be 13 14 achieved.

¹⁵ Permeability of bentonite is inversely correlated to dry density. Figure G2A-3 plots bentonite

permeability as a function of reported sample density for sodium bentonite samples. The

permeability ranges from approximately 1×10^{-21} to 1×10^{-17} m². In all cases, the data in Figure G2A-3 are representative of low ionic strength permeant waters. Data provided in this figure are

G2A-3 are representative of low ionic strength permeant waters. Data provided in this figure are
 limited to sodium bentonite and bentonite/sand mixtures with clay content greater than or equal

to 50 %. Cheung et al. (1987) report that in bentonite/sand mixtures, sand acts as an inert

fraction which does not alter the permeability of the mixture from that of a 100 % bentonite

sample at the same equivalent dry density. Also included in Figure G2A-3 are the three point

estimates of permeability at dry densities of 1.4, 1.8, and 2.1 g/cm³ provided by Jaak Daemen of

the University of Nevada, Reno, who is actively engaged in WIPP-specific bentonite testing.

A series of in situ tests (SSSPTs) that evaluated compacted bentonite as a sealing material at

the WIPP site corroborate data shown in Figure G2A-3. Test Series D tested two 100 %

bentonite seals in vertical boreholes within the Salado Formation at the repository horizon. The

diameter of each seal was 0.91 m, and the length of each seal was 0.91 m. Cores of the two

bentonite seals had initial dry densities of 1.8 and 2.0 g/cm³. Pressure differentials of 0.72 and
 0.32 MPa were maintained across the bentonite seals with a brine reservoir on the upstream

(bottom) of the seals for several years.

Over the course of the seal test, no visible brine was observed at the downstream end of the seals. Upon decommissioning the SSSPT, brine penetration was found to be only 15 cm. Determination of the absolute permeability of the bentonite seal was not precise; however, a bounding calculation of 1×10^{-19} m² was made by Knowles and Howard (1996).

Beginning with a specified dry density of 1.8 to 2.0 g/cm³ and Figure G2A-3, a distribution function for clay permeability was developed and is provided in Figure G2A-4. Parameter distribution reflects some conservative assumptions pertaining to WIPP seal applications. The following provide rationale behind the distribution presented in Figure G2A-4.

40 1. A practical minimum for the distribution can be specified at 1×10^{-21} m².

- If effective dry density of the bentonite emplaced in the seals only varies from 1.8 to 2.0 g/cm³, then a maximum expected permeability can be extrapolated from Figure G2A-3 as 1×10⁻¹⁹ m².
- 3. Uncertainty exists in being able to place massive columns of bentonite to design 4 specifications. To address this uncertainty in a conservative manner, it is assumed that 5 the compacted clay be placed at a dry density as low as 1.6 g/cm³. At 1.6 g/cm³, the 6 maximum permeability for the clay would be approximately 5×10⁻¹⁹ m². Therefore, 7 neglecting salinity effects, a range of permeability from 1×10^{-21} to 5×10^{-19} m² with a 8 best estimate of less than 1×10⁻¹⁹ m² could be reasonably defined (assuming a best 9 estimate emplacement density of 1.8 g/cm³). It could be argued, based on Figure G2A-10 3, that a best estimate could be as low as $2 \times 10^{-20} \text{m}^2$. 11

Salinity increases bentonite permeability; however, these effects are greatly reduced at the 12 densities specified for the shaft seal. At seawater salinity, Pusch et al. (1989) report the effects 13 on permeability could be as much as a factor of 5 (one-half order of magnitude). To account for 14 salinity effects in a conservative manner, the maximum permeability is increased from 5×10⁻¹⁹ 15 to 5×10^{-18} m². The best estimate permeability is increased by one-half order of magnitude to 16 5×10^{-19} m². The lower limit is held at 1×10^{-21} m². Because salinity effects are greatest at lower 17 densities, the maximum is adjusted one full order of magnitude while the best estimate 18 (assumed to reside at a density of 1.8 g/cm³) is adjusted one-half of an order. 19

The four arguments presented above give rise to the permeability cumulative frequency distribution plotted in Figure G2A-4, which summarizes the performance specification for bentonite columns.

23 A2.2.5 Verification Methods

1

2

3

Verification of specified properties such as density, moisture content or strength of compacted 24 clay seals can be determined by direct access during construction. However, indirect methods 25 are preferred because certain measurements, such as permeability, are likely to be time 26 consuming and invasive. Methods used to verify the quality of emplaced seals will include 27 quality of block production and field measurements of density. As a minimum, standard quality 28 control procedures recommended for compaction operations will be implemented including 29 visual observation, in situ density measurements, and moisture content measurements. Visual 30 observation accompanied by detailed record keeping will assure design procedures are being 31 followed. In situ testing will confirm design objectives are accomplished in the field. 32

Density measurements of compacted clay shall follow standard procedures such as ASTM D 1556, D 2167, and D 2922. The moisture content of clay blocks shall be calculated based on the water added during mixing and can be confirmed by following ASTM Standard procedures D 2216 and D 3017. It is probable that verification procedures will require modifications to be applicable within the shaft. As a minimum, laboratory testing to certify the above referenced quality control measures will be performed to assure that the field measurements provide reliable results.

40 A2.3 Asphalt Components

Asphalt is used to prevent water migration down the shaft in two ways: an asphalt column

bridging the Rustler/Salado contact and a "waterstop" sandwiched between concrete plugs at

three locations within the Salado Formation, two above the salt column and one below the salt

2 column. An asphalt mastic mix (AMM) that contains aggregate is specified for the column while

3 the specification for the waterstop layer is pure asphalt.

4 Asphalt is a widely used construction material with many desirable properties. Asphalt is a

5 strong cement, is readily adhesive, highly waterproof, and durable. Furthermore, it is a plastic

6 substance that provides controlled flexibility to mixtures of mineral aggregates with which it is

7 usually combined. It is highly resistant to most acids, salts, and alkalis. A number of asphalts

and asphalt mixes are available that cover a wide range of viscoelastic properties which allows
 the properties of the mixture to be designed for a wide range of requirements for each

the properties of the mixture to be designed for a wide range of requirements for each
 application. These properties are well suited to the requirements of the WIPP shaft seal system.

11 A2.3.1 Functions

The generic purpose of asphalt seal components above the salt column is to eliminate water 12 migration downward. The asphalt waterstops above the salt column are designed to intersect 13 the DRZ and limit fluid flow. Asphalt is not the lone component preventing flow of brine 14 downward; it functions in tandem with concrete and a compacted clay column. Waterstop 15 Component # 11 located below the salt column would naturally limit upward flow of brine or gas. 16 Concrete abutting the asphalt waterstops provides a rigid element that creates a backstress 17 upon the inward creeping salt, promoting healing within the DRZ. Asphalt is included in the 18 WIPP shaft seal system to reduce uncertainty of system performance by providing redundancy 19 of function while using an alternative material type. The combination of shaft seal components 20 restricts fluid flow up or down to allow time for the salt column to reconsolidate and form a 21 natural fluid-tight seal. 22

The physical and thermal attributes of asphalt combine to reduce fluid flow processes. The placement fluidity permits asphalt to flow into uneven interstices or fractures along the shaft wall. Asphalt will self-level into a nearly voidless mass. As it cools, the asphalt will eventually cease flowing. The elevated temperature and thermal mass of the asphalt will enhance creep deformation of the salt and promote healing of the DRZ surrounding the shaft. Asphalt adheres tightly to most materials, eliminating flow along the interface between the seal material and the surrounding rock.

30 A2.3.2 Material Characteristics

The asphalt column specified for the WIPP seal system is an AMM commonly used for hydraulic structures. The AMM is a mixture of asphalt, sand, and hydrated lime. The asphalt content of AMM is higher than those used in typical hot mix asphalt concrete (pavements). High asphalt contents (10-20% by weight) and fine, well-graded aggregate (sand and mineral fillers) are used to obtain a near voidless mix. A low void content ensures a material with extremely low water permeability because there are a minimum number of connected pathways for brine migration.

A number of different asphaltic construction materials, including hot mix asphalt concrete (HMAC), neat asphalt, and AMMs, were evaluated for use in the WIPP seal design. HMAC was eliminated because of construction difficulty that might have led to questionable performance. An AMM is selected as a preferred alternative for the asphalt columns because it has economic and performance advantages over the other asphaltic options. Aggregate and mineral fines in the AMM increase rigidity and strength of the asphalt seal component, thereby enhancing the potential to heal the DRZ and reducing shrinkage relative to neat asphalt. 1 Viscosity of the AMM is an important physical property affecting construction and performance.

2 The AMM is designed to have low enough viscosity to be pumpable at application temperatures

and able to flow readily into voids. High viscosity of the AMM at operating temperatures

4 prevents long-term flow, although none is expected. Hydrated lime is included in the mix design

to increase the stability of the material, decrease moisture susceptibility, and act as an anti-

6 microbial agent. Table A-9 details the mix design specifications for the AMM.

The asphalt used in the waterstop is AR-4000, a graded asphalt of intermediate viscosity. The
 waterstop uses pure, or neat, asphalt because it is a relatively small volume when compared to

9 the column.

10 A2.3.3 Construction

Construction of asphalt seal components can be accomplished using a slickline process where 11 the molten material is effectively pumped into the shaft. The AMM will be mixed at ground level 12 in a pug mill at approximately 180°C. At this temperature the material is readily pourable. The 13 AMM will be slicklined and placed using a heated and insulated tremie line. The AMM will easily 14 flow into irregularities in the surface of the shaft or open fractures until the AMM cools. After 15 cooling, flow into surface irregularities in the shaft and DRZ will slow considerably because of 16 the sand and mineral filler components in the AMM and the temperature dependence of the 17 viscosity of the asphalt. AMM requires no compaction in construction. Neat asphalt will be 18 placed in a similar fashion. 19

The technology to pump AMM is available as described in the construction procedures in 20 Appendix B. One potential problem with this method of construction is ensuring that the slickline 21 remains heated throughout the construction phase. Impedance heating (a current construction 22 technique) can be used to ensure the pipe remains at temperatures sufficient to promote flow. 23 The lower section (say 10 m) of the pipe may not need to be heated, and it may not be desirable 24 to heat it as it is routinely immersed in the molten asphalt during construction to minimize air 25 entrainment. Construction using large volumes of hot asphalt would be facilitated by placement 26 in sections. After several meters of asphalt are placed, the slickline would be retracted by two 27 lengths of pipe and pumping resumed. Once installed, the asphalt components will cool; the 28 column will require several months to approach ambient conditions. Calculations of cooling 29 times and plots of isotherms for the asphalt column are given in Appendix D of the Compliance 30 Submittal Design Report (Sandia, 1996). It should be noted that a thermal pulse into the 31 surrounding rock salt could produce positive rock mechanics conditions. Fractures will heal 32 much faster owing to thermally activated dislocation motion and diffusion. Salt itself will creep 33 inward at a much greater rate as well. 34

35

Table A-9
Asphalt Component Specifications

AMM Composition:	20 wt% asphalt (AR-4000 g 70 wt% aggregate (silicate 10 wt% hydrated lime		
	Aggregate (% passing by v		
US Sieve Size		Specification Limits	
2.36 mm	(No. 8)	100	
1.18 mm	(No. 16)	90	
600	(No. 30)	55-75	
300	(No. 50)	35-50	
150	(No. 100)	15-30	
75	(No. 200)	5-15	
Unhydrated lime weight (% Free water (% by weight H ₂ Residue Analysis: Residue retained on No. 6 s	by weight) by weight CaO) O)		

3 A2.3.4 Performance Requirements

Asphalt components are required to endure for about 100 years as an interim seal while the
compacted salt component reconsolidates to create a very low permeability seal component.
Since asphalt will not be subjected to ultraviolet light or an oxidizing environment, it is expected
to provide an effective brine seal for several centuries. Air voids should be less than 2% to
ensure low permeability. Asphalt mixtures do not become measurably permeable to water until
voids approach 8% (Brown, 1990).

At Hanford, experiments are ongoing on the development of a passive surface barrier designed 10 to isolate wastes (in this case to prevent downward flux of water and upward flux of gases) for 11 1000 years with no maintenance. The surface barrier uses asphalt as one of many horizontal 12 components because low-air-void, high-asphalt-content materials are noted for low permeability 13 and improved mechanically stable compositions. The design objective of this asphalt concrete 14 was to limit infiltration to 1.6×10⁻⁹ cm/s (1.6×10⁻¹¹ m/s, or for fresh water, an intrinsic 15 permeability of 1.6×10⁻¹⁸ m²). The asphalt component of the barrier is composed of a 15 cm 16 layer of asphaltic concrete overlain with a 5-mm layer of fluid-applied asphalt. The reported 17 hydraulic conductivity of the asphalt concrete is estimated to be 1×10⁻⁹ m/s (equivalent to an 18 intrinsic permeability of approximately 1×10⁻¹⁶ m² assuming fresh water). Myers and Duranceau 19 (1994) report that the hydraulic conductivity of fluid-applied asphalt is estimated to be 1.0×10⁻¹¹ 20 to 1.0×10⁻¹⁰ cm/s (equivalent to an intrinsic permeability of approximately 1.0×10⁻²⁰ to 1.0×10⁻¹⁹ 21 m² assuming fresh water). 22

- 1 Consideration of published values results in a lowest practical permeability of 1×10⁻²¹ m². The
- ² upper limit of the asphalt seal permeability is assumed to be 1×10⁻¹⁸ m². Intrinsic permeability of
- 3 the asphalt column is defined as a log triangular distributed parameter, with a best estimate
- 4 value of 1×10^{-20} m², a minimum value of 1×10^{-21} m², and a maximum value of 1×10^{-18} m², as
- 5 shown in Figure G2A-5. It is recognized that the halite DRZ in the uppermost portion of the
- 6 Salado Formation is not likely to heal because creep of salt is relatively slow.
- 7 These values are used in performance assessment of regulatory compliance analyses and in
- 8 fluid flow calculations (Appendix C of the Compliance Submittal Design Report (Sandia, 1996))
- 9 pertaining to seal system functional evaluation. Other calculations pertaining to rock mechanics
- and structural considerations of asphalt elements are discussed in Appendix D of the
- 11 Compliance Submittal Design Report (Sandia, 1996).

12 A2.3.5 Verification Methods

- 13 Viscosity of the AMM must be low enough for easy delivery through a heated slickline. Sufficient
- text book information is available to assure performance of the asphalt component; however,
- 15 laboratory validation tests may be desirable before installation. There are no plans to test
- asphalt components after they are placed. With that in mind, some general tests identified below
- 17 would add quantitative documentation to expected performance values and have direct
- application to WIPP. The types and objectives of the verification tests are:
- *Mix Design.* A standard mix design which evaluates a combination of asphalt and aggregate mixtures would quantify density, air voids, viscosity, and permeability. Although the specified mixture will function adequately, studies could optimize the mix design.
- 22 *Viscoelastic Properties at Service Temperatures.* Viscoelastic properties over the range of 23 expected service temperatures would refine the rheological model.
- Accelerated Aging Analysis. Asphalt longevity issues could be further addressed by using the approach detailed in PNL-Report 9336 (Freeman and Romine, 1994).
- 26 Brine Susceptibility Analysis. The presumed inert nature of the asphalt mix can be
- demonstrated through exposure to groundwater brine solutions found in the Salado Formation.
- 28 Potential for degradation will be characterized by monitoring the presence of asphalt
- degradation products in WIPP brine or brine simulant as a function of time. Effects on hydraulic
- 30 conductivity can be measured during these experiments.

31 A2.4 Compacted Salt Column

- A reconstituted salt column has been proposed as a primary means to isolate for several
- decades those repositories containing hazardous materials situated in evaporite sequences.
- Reuse of salt excavated in the process of creating the underground openings has been
- advocated since the initial proposal by the NAS in the 1950s. Replacing the natural material to
- its original setting ensures physical, chemical, and mechanical compatibility with the host
- formation. Recent developments in support of the WIPP shaft seal system have produced
- confirming experimental results, constitutive material laws, and construction methods that
- ³⁹ substantiate use of a salt column for a low permeability, perfectly compatible seal component.

1 Numerical models of the shaft and seal system have been used to provide information on the

- 2 mechanical processes that affect potential pathways and overall performance of the seal
- 3 system. Several of these types of analyses are developed in Appendix D of the Compliance
- 4 Submittal Design Report (Sandia, 1996). Simulations of the excavated shaft and the compacted
- 5 salt seal element behavior after placement show that as time passes, the host salt creeps
- 6 inward, the compacted salt is loaded by the host formation and consolidates, and a back
- 7 pressure is developed along the shaft wall. The back pressure imparted to the host formation by
- 8 the compacted salt promotes healing of any microcracks in the host rock. As compacted salt
- 9 consolidates, density and stiffness increase and permeability decreases.

10 **A2.4.1 Functions**

The function of the compacted and reconsolidated salt column is to limit transmission of fluids into or out of the repository for the statutory period of 10,000 years. The functional period starts within a hundred years and lasts essentially forever. After a period of consolidation, the salt column will almost completely retard gas or brine migration within the former shaft opening. A completely consolidated salt column will achieve flow properties indistinguishable from natural Salado salt.

17 A2.4.2 Material Characteristics

The salt component comprises crushed Salado salt with addition of small amounts of water. No admixtures other than water are needed to meet design specifications. Natural Salado salt (also called WIPP salt) is typical of most salts in the Permian Basin: it has an overall composition approaching 90-95 % halite with minor clays, carbonate, anhydrite, and other halite minerals. Secondary minerals and other impurities are of little consequence to construction or performance of the compacted salt column as long as the halite content is approximately 90 %.

The total water content of the crushed salt should be approximately 1.5 wt% as it is tamped into 24 place. Field and laboratory testing verified that natural salt can be compacted to significant 25 density ($\rho \ge 0.9$) with addition of these modest amounts of water. In situ WIPP salt contains 26 approximately 0.5 wt% water. After it is mined, transported, and stored, some of the connate 27 water is lost to evaporation and dehydration. Water content of the bulk material that would be 28 used for compaction in the shaft is normally quite small, on the order of 0.25 wt%, as measured 29 during compaction demonstrations (Hansen and Ahrens, 1996). Measurements of water content 30 of the salt will be necessary periodically during construction to calibrate the proper amount of 31 water to be added to the salt as it is placed. 32

Water added to the salt will be sprayed in a fine mist onto the crushed salt as it is cast in each lift. Methods similar to those used in the large-scale compaction demonstration will be developed such that the spray visibly wets the salt grain surfaces. General uniformity of spray is desired. The water has no special chemical requirements for purity. It can be of high quality (drinkable) but need not be potable. Brackish water would suffice because water of any quality would become brackish upon application to the salt.

³⁹ The mined salt will be crushed and screened to a nominal maximum diameter of 5 mm.

- 40 Gradation of particles smaller than 5 mm is not of concern because the crushing process will
- create relatively few fines compared to the act of dynamic compaction. Based on preliminary
- ⁴² large-scale demonstrations, excellent compaction was achieved without optimization of particle
- sizes. It is evident from results of the large compaction demonstration coupled with laboratory

1 studies that initial density can be increased and permeability decreased beyond existing

2 favorable results. Further demonstrations of techniques, including crushing and addition of

3 water may be undertaken in ensuing years between compliance certification and beginning of

4 seal placement.

5 A2.4.3 Construction

Dynamic compaction is the specified procedure to tamp crushed salt in the shaft. Other 6 techniques of compaction have potential, but their application has not been demonstrated. Deep 7 dynamic compaction provides the greatest energy input to the crushed salt, is easy to apply, 8 and has an effective depth of compactive influence far greater than lift thickness. Dynamic 9 compaction is relatively straightforward and requires a minimal work force. If the number of 10 drops remains constant, diameter and weight of the tamper increases in proportion to the 11 diameter of the shaft. The weight of the tamper is a factor in design of the infrastructure 12 supporting the hoisting apparatus. Larger, heavier tampers require equally stout staging. The 13 construction method outlined in Appendix B balances these opposing criteria. Compaction itself 14 will follow the successful procedure developed in the large-scale compaction demonstration 15 (Hansen and Ahrens, 1996). 16

Transport of crushed salt to the working level can be accomplished by dropping it down a
 slickline. As noted, additional water will be sprayed onto the crushed salt at the bottom of the
 shaft as it is placed. Lift heights of approximately 2 m are specified, though greater depths could
 be compacted effectively using dynamic compaction. Uneven piles of salt can be hand leveled.

21 A2.4.4 Performance Requirements

Compacted crushed salt is a unique seal material because it consolidates naturally as the host 22 formation creeps inward. As the crushed salt consolidates, void space diminishes, density 23 increases, and permeability decreases. Thus, sealing effectiveness of the compacted salt 24 column will improve with time. Laboratory testing over the last decade has shown that 25 pulverized salt specimens can be compressed to high densities and low permeabilities (Brodsky 26 et al., 1996). In addition, consolidated crushed salt uniquely guarantees chemical and 27 mechanical compatibility with the host salt formation. Therefore, crushed salt will provide a seal 28 that will function essentially forever once the consolidation process is completed. Primary 29 performance results of these analyses include plots of fractional density as a function of depth 30 and time for the crushed salt column and permeability distribution functions that will be used for 31 performance assessment calculations. These performance results are summarized near the end 32 of this section, following a limited background discussion. 33

To predict performance, a constitutive model for crushed salt is required. To this end, a 34 technical evaluation of potential crushed salt constitutive models was completed (Callahan et 35 al., 1996). Ten potential crushed salt constitutive models were identified in a literature search to 36 describe the phenomenological and micromechanical processes governing consolidation of 37 crushed salt. Three of the ten potential models were selected for rigorous comparisons to a 38 specially developed, although somewhat limited, database. The database contained data from 39 hydrostatic and shear consolidation laboratory experiments. The experiments provide 40 deformation (strain) data as a function of time under constant stress conditions. Based on 41 volumetric strain measurements from experiments, change in crushed salt density and porosity 42 are known. In some experiments, permeability was also measured, which provides a 43 relationship between density and permeability of crushed salt. Models were fit to the 44

1 experimental database to determine material parameter values and the model that best

2 represents experimental data.

Modeling has been used to predict consolidating salt density as a function of time and position 3 in the shaft. Position or depth of the calculation is important because creep rates of intact salt 4 and crushed salt are strong functions of stress difference. Analyses made use of a "pineapple" 5 slice structural model at the top (430 m), middle (515 m), and bottom (600 m) of the compacted 6 salt column. Initial fractional density of the compacted crushed salt was 0.90 (1944 kg m⁻³). The 7 structural model, constitutive material models, boundary conditions, etc. are described in 8 Appendix D of the Compliance Submittal Design Report (Sandia, 1996). Modeling results 9 coupled with laboratory-determined relationships between density and permeability were used 10 to develop distribution functions for permeability of the compacted crushed salt column for 11 centuries after seal emplacement. 12

Analyses used reference engineering values for parameters in the constitutive models (e.g., the creep model for intact salt and consolidation models for crushed salt). Some uncertainty associated with model parameters exists in these constitutive models. Consolidating salt density was quantified by predicting density at specific times using parameter variations. Many of these types of calculations comparing three models for consolidation of crushed salt were performed to quantify performance of the salt column, and the reader is referred to Appendix D of the Compliance Submittal Design Report (Sandia, 1996) for more detail.

Predictions of fractional density as a function of time and depth are shown in Figure G2A-6. 20 Performance calculations of the seal system require quantification of the resultant salt 21 permeability. The permeability can be derived from the experimental data presented in Figure 22 G2A-7. This plot depicts probabilistic lines through the experimental data. From these lines, 23 distribution functions can be derived. Permeability of the compacted salt column is treated as a 24 transient random variable defined by a log triangular distribution. Distribution functions were 25 provided for 0, 50, 100, 200, and 400 years after seal emplacement, assuming that fluids in the 26 salt column pores spaces would not produce a backstress. The resultant cumulative frequency 27 distribution for seal permeability at the seal mid-height is shown in Figure G2A-8. This method 28 predicts permeabilities ranging from 1×10⁻²³ m² to 1×10⁻¹⁶ m². Because crushed salt 29 consolidation will be affected by both mechanical and hydrological processes, detailed 30 calculations were performed. These calculations are presented in Appendices C and D. 31

Numerical models of the shaft provide density of the compacted salt column as a function of depth and time. From the density-permeability relationship, permeability of the compacted salt seal component can be calculated. Similarly, the extent of the disturbed rock zone around the shaft is provided by numerical models. From field measurements of the halite DRZ, permeability of the DRZ is known as a function of depth and time. These spatial and temporal permeability values provide information required to assess the potential for brine and gas movement in and around the consolidating salt column.

39 A2.4.5 Verification Methods

Results of the large-scale dynamic compaction demonstration suggest that deep dynamic
 compaction will produce a dense starting material, and laboratory work and modeling show that
 compacted salt will reconsolidate within several decades to an essentially impermeable mass.
 As with other seal components, testing of the material in situ will be difficult and probably not the
 best way to ensure quality of the seal element. This is particularly apparent for the compacted

1 salt component because the compactive effort produces a finely powdered layer on the top of

2 each lift. It turns out that the fine powder compacts into a very dense material when the next lift

3 is compacted. The best way to ensure that the crushed salt element functions properly is to

4 establish performance through QA/QC procedures. If crushed salt is placed with a reasonable

⁵ uniformity of water and is compacted with sufficient energy, long-term performance can be

6 assured.

Periodic measurements of the water content of loose salt as it is placed in lifts will be used for
verification and quality control. Thickness of lifts will be controlled. Energy imparted to each lift
will be documented by logging drop patterns and drop height. If deemed necessary, visual
inspection of the tamped salt can be made by human access. The powder layer can be
shoveled aside and hardness of underlying material can be qualitatively determined or tested.
Overall geometric measurements made from the original surface of each lift could be used to
approximate compacted density.

14 A2.5 Cementitious Grout

¹⁵ Cementitious grouting is specified for all concrete members in response to external review

suggestions. Grouting is also used in advance of liner removal to stabilize the ground.

17 Cementitious grout is specified because of its proven performance, nontoxicity, and previous

18 use at the WIPP.

19 A2.5.1 Functions

The function of grout is to stabilize the surrounding rock before existing concrete liners are 20 removed. Grout will fill fractures within adjacent lithologies, thereby adding strength and 21 reducing permeability. Grout around concrete members of the concrete asphalt waterstop will 22 be employed in an attempt to tighten the interface and fill microcracks in the DRZ. Efficacy of 23 grouting will be determined during construction. In addition, reduction of local permeability will 24 further limit groundwater influx into the shaft during construction. Concrete plugs are planned for 25 specific elevations in the lined portion of each shaft. The formation behind the concrete liner will 26 be grouted from approximately 3 m below to 3 m above the plug positions to ensure stability of 27 any loose rock. 28

29 A2.5.2 Material Characteristics

³⁰ The grout developed for use in the shaft seal system has the following characteristics:

- no water separation upon hydration,
- low permeability paste,
- fine particle size,
- low hydrational heat,
- no measurable agglomeration subsequent to mixing,
- two hours of injectability subsequent to mixing,
- short set time,
- high compressive strength, and
- competitive cost.

A cementitious grout developed by Ahrens and coworkers (Ahrens et al., 1996) is specified for application in the shaft seal design. This grout consists of portland cement, pumice as a pozollanic material, and superplasticizer in the proportions listed in Table A-10. The ultrafine grout is mixed in a colloidal grout mixer, with a water to components ratio (W:C) of 0.6:1. Grout has been produced with 90 % of the particles smaller than 5 microns and an average particle size of 2 microns. The extremely small particle size enables the grout to penetrate fractures with apertures as small as 6 microns.

- 8
- 9

Table A-10 Ultrafine Grout Mix Specification

Component	Weight Percent (wt%)
Type 5 portland cement	45
Pumice	55
Superplasticizer	1.5

10 A2.5.3 Construction

Grout holes will be drilled in a spin pattern that extends from 3 m below to 3 m above that portion of the lining to be removed. The drilling and grouting sequence will be defined in the workmanship specifications prior to construction. Grout will be mixed on surface and transferred to the work deck via the slick line. Maximum injection pressure will be lithostatic, less 50 psig. It is estimated that four holes can be drilled and grouted per shift.

16 A2.5.4 Performance Requirements

Performance of grout is not a consideration for compliance issues. Grouting is used to facilitate 17 construction by stabilizing any loose rock behind the concrete liner. If the country rock is 18 fractured, grouting will reduce the permeability of the DRZ significantly. Application at the WIPP 19 demonstrated permeability reduction in an anhydrite marker bed of two to three orders of 20 magnitude (Ahrens et al., 1996). Reduction of local permeability adds to longevity of the grout 21 itself and reduces the possibility of brine contacting seal elements. Because grout does not 22 influence compliance issues, a model for it is not used and has not been developed. General 23 performance achievements are: 24

- filled fractures as small as 6 microns,
- no water separation upon hydration,
- no evidence of halite dissolution,
- no measurable agglomeration subsequent to mixing,
- one hour of injectability,
- initial Vicat needle set in 2.5 hours,
- compressive strength 40 MPa at 28 days, and
- competitive cost.

33 A2.5.5 Verification Methods

No verification of the effectiveness of grouting is currently specified. If injection around concrete plugs is possible, an evaluation of quantities and significance of grouting will be made during 1 construction. Procedural specifications will include measurements of fineness and determination

- ² of rheology in keeping with processes established during the WIPP demonstration grouting
- 3 (Ahrens et al., 1996).

4 A2.6 Earthen Fill

5 Compacted earthen fill comprise approximately 150 m of shaft fill in the Dewey Lake Redbeds 6 and near surface stratigraphy.

7 A2.6.1 Functions

There are minimal performance requirements imposed for Components 1 and 3 and none that
 affect regulatory compliance of the site. Specifications for Components 1 and 3 are general: fill
 the shaft with relatively dense material to reduce subsidence.

11 A2.6.2 Material Characteristics

Fill can utilize material that was excavated during shaft sinking and stored at the WIPP site, or a borrow pit may be excavated to secure fill material. The bulk fill material may include bentonite additive, if deemed appropriate.

15 A2.6.3 Construction

Dynamic compaction is specified for the clay column in the Dewey Lake Formation because of its perceived expediency. Vibratory compaction will be used near surface when there is no longer space for the three stage construction deck.

19 A2.6.4 Performance Requirements

20 Care will be taken to compact the earthen fill with an energy of twice Modified Proctor energy, 21 which has been shown to produce a dense, uniform fill.

22 A2.6.6 Verification

²³ Materials placed will be documented, with density measurements as appropriate.

24 A3. CONCLUDING REMARKS

Material specifications in this appendix provide descriptions of seal materials along with reasoning about why they are expected to function well in the WIPP setting. The specification

follows a framework that states the function of the seal component, a description of the material,

and a summary of construction techniques that could be implemented without resorting to

extensive development efforts. Discussion of performance requirements for each material is the

30 most detailed section because design of the seal system requires analysis of performance to

ascertain compliance with regulations. Successful design of the shaft seal system is

demonstrated by an evaluation of how well the design performs, rather than by comparison with

a predetermined quantity.

Materials chosen for use in the shaft seal system have several common desirable attributes: low

35 permeability, availability, high density, longevity, low cost, constructability, and supporting

- documentation. Functional redundancy using different materials provides an economically and technologically feasible shaft seal system that limits fluid transport.

1 A4. REFERENCES

Ahrens, E.H., T.F. Dale, and R.S. Van Pelt. 1996. Data Report on the Waste Isolation Pilot Plant

3 Small-Scale Seal Performance Test, Series F Grouting Experiment. SAND93-1000.

- 4 Albuquerque, NM: Sandia National Laboratories. (Copy on file in the Sandia WIPP Central Files,
- 5 Sandia National Laboratories, Albuquerque, NM [SWCF] as WPO37355.)
- 6 American Colloid Company. 1995. "Technical Data Sheet. Volclay GPG 30." Arlington Heights,
- 7 IL: Industrial Chemical Division, American Colloid Company. 1 p. (Copy on file in the SWCF as
- 8 WPO39636.)
- 9 American Petroleum Institute. 1990. "Specification for Materials and Testing for Well Cements."
- API Specification 10. 5th ed. Washington, DC: American Petroleum Institute. (Available from
- American Petroleum Institute, 1220 L St. NW, Washington, DC 20005, 202/682-8375.)
- ASTM C 33 93. "Specification for Concrete Aggregates," *Annual Book of ASTM Standards,*
- Volume 04.02, Concrete and Aggregates. Philadelphia, PA: American Society for Testing and
- 14 Materials. (Available from American Society for Testing and Materials, 1916 Race Street,
- 15 Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 39 94. "Test Method for Compressive Strength of Cylindrical Concrete Specimens,"
- 17 Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates. Philadelphia, PA:
- American Society for Testing and Materials. (Available from American Society for Testing and
- ¹⁹ Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 40 92. "Test Method for Organic Impurities in Fine Aggregates for Concrete," Annual
- Book of ASTM Standards, Volume 04.02, Concrete and Aggregates. Philadelphia, PA:
- American Society for Testing and Materials. (Available from American Society for Testing and
- 23 Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 114 94. "Test Methods for Chemical Analysis of Hydraulic Cement," *Annual Book of ASTM Standards, Volume 04.01, Cement; Lime; Gypsum.* Philadelphia, PA: American Society
 for Testing and Materials. (Available from American Society for Testing and Materials, 1916
 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 117 95. "Test Method for Material Finer Than 75-:m (No. 200) Sieve in Mineral
 Aggregates by Washing," *Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates*. Philadelphia, PA: American Society for Testing and Materials. (Available from
 American Society for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187,
 215/299-5400.)
- ASTM C 123 94. "Test Method for Lightweight Pieces in Aggregate," Annual Book of ASTM
- 34 Standards, Volume 04.02, Concrete and Aggregates. Philadelphia, PA: American Society for
- 35 Testing and Materials. (Available from American Society for Testing and Materials, 1916 Race
- 36 Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 127 88 (1993). "Test Method for Specific Gravity and Absorption of Coarse
- Aggregate," Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates.
- ³⁹ Philadelphia, PA: American Society for Testing and Materials. (Available from American Society
- 40 for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)

- ASTM C 128 93. "Test Method for Specific Gravity and Absorption of Fine Aggregate," Annual
- 2 Book of ASTM Standards, Volume 04.02, Concrete and Aggregates. Philadelphia, PA:
- 3 American Society for Testing and Materials. (Available from American Society for Testing and
- 4 Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- 5 ASTM C 131 89. "Test Method for Resistance to Degradation of Small-Size Coarse Aggregate
- by Abrasion and Impact in the Los Angeles Machine," Annual Book of ASTM Standards,
- 7 Volume 04.02, Concrete and Aggregates. Philadelphia, PA: American Society for Testing and
- 8 Materials. (Available from American Society for Testing and Materials, 1916 Race Street,
- 9 Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 136 95a. "Test Method for Sieve Analysis of Fine and Coarse Aggregates," Annual
- Book of ASTM Standards, Volume 04.02, Concrete and Aggregates. Philadelphia, PA:
- 12 American Society for Testing and Materials. (Available from American Society for Testing and
- 13 Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- 14 ASTM C 138 92. "Test Method for Unit Weight, Yield, and Air Content (Gravimetric) of
- ¹⁵ Concrete," Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates.
- ¹⁶ Philadelphia, PA: American Society for Testing and Materials. (Available from American Society
- for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 142 78 (1990). "Test Method for Clay Lumps and Friable Particles in Aggregates,"
- 19 Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates. Philadelphia, PA:
- 20 American Society for Testing and Materials. (Available from American Society for Testing and
- 21 Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 143 90a. "Test Method for Slump of Hydraulic Cement Concrete," *Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates.* Philadelphia, PA: American Society
 for Testing and Materials. (Available from American Society for Testing and Materials, 1916
 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 150 95. "Specification for Portland Cement," *Annual Book of ASTM Standards, Volume 04.01, Cement; Lime; Gypsum.* Philadelphia, PA: American Society for Testing and
 Materials. (Available from American Society for Testing and Materials, 1916 Race Street,
 Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 157 93. "Test Method for Length Change of Hardened Hydraulic-Cement Mortar and
 Concrete," *Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates.* Philadelphia, PA: American Society for Testing and Materials. (Available from American Society
 for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 204 94a. "Test Method for Fineness of Hydraulic Cement by Air Permeability
- Apparatus," Annual Book of ASTM Standards, Volume 04.01, Cement; Lime; Gypsum.
- ³⁶ Philadelphia, PA: American Society for Testing and Materials. (Available from American Society
- for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM C 231 91b. "Test Method for Air Content of Freshly Mixed Concrete by the Pressure
- ³⁹ Method," Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates.
- 40 Philadelphia, PA: American Society for Testing and Materials. (Available from American Society
- for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)

- ASTM C 294 86 (1991). "Descriptive Nomenclature for Constituents of Natural Mineral 1
- 2 Aggregates," Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates.
- Philadelphia, PA: American Society for Testing and Materials. (Available from American Society 3
- for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.) 4
- ASTM C 295 90. "Guide for Petrographic Examination of Aggregates for Concrete," Annual 5
- Book of ASTM Standards, Volume 04.02, Concrete and Aggregates. Philadelphia, PA: 6
- American Society for Testing and Materials. (Available from American Society for Testing and 7
- Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.) 8
- ASTM C 311 94b. "Test Methods for Sampling and Testing Fly Ash or Natural Pozzolans for 9 Use as a Mineral Admixture in Portland-Cement Concrete," Annual Book of ASTM Standards, 10 Volume 04.02, Concrete and Aggregates. Philadelphia, PA: American Society for Testing and 11 Materials. (Available from American Society for Testing and Materials, 1916 Race Street, 12
- Philadelphia, PA 19103-1187, 215/299-5400.) 13
- ASTM C 469 94. "Test Method for Static Modulus of Elasticity and Poisson's Ratio of Concrete 14 in Compression," Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates. 15 Philadelphia, PA: American Society for Testing and Materials. (Available from American Society 16 for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- 17
- ASTM C 534 94. "Specification for Preformed Flexible Elastomeric Cellular Thermal Insulation 18
- in Sheet and Tubular Form," Annual Book of ASTM Standards, Volume 04.06, Thermal 19
- Insulation; Environmental Acoustics. Philadelphia, PA: American Society for Testing and 20
- Materials. (Available from American Society for Testing and Materials, 1916 Race Street, 21
- Philadelphia, PA 19103-1187, 215/299-5400.) 22
- ASTM C 535 89. "Test Method for Resistance to Degradation of Large-Size Coarse Aggregate 23 by Abrasion and Impact in the Los Angeles Machine," Annual Book of ASTM Standards, 24
- Volume 04.02, Concrete and Aggregates. Philadelphia, PA: American Society for Testing and 25
- Materials. (Available from American Society for Testing and Materials, 1916 Race Street, 26
- Philadelphia, PA 19103-1187, 215/299-5400.) 27
- 28 ASTM C 566 - 95. "Test Method for Total Moisture Content of Aggregate by Drying," Annual
- Book of ASTM Standards, Volume 04.02, Concrete and Aggregates. Philadelphia, PA: 29
- American Society for Testing and Materials. (Available from American Society for Testing and 30
- Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.) 31
- ASTM C 618 95. "Specification for Coal Fly Ash and Raw or Calcined Natural Pozzolan for 32
- Use as a Mineral Admixture in Portland Cement Concrete," Annual Book of ASTM Standards, 33
- Volume 04.02, Concrete and Aggregates. Philadelphia, PA: American Society for Testing and 34
- Materials. (Available from American Society for Testing and Materials, 1916 Race Street, 35
- Philadelphia, PA 19103-1187, 215/299-5400.) 36
- ASTM C 845 90. "Specification for Expansive Hydraulic Cement," Annual Book of ASTM 37
- Standards, Volume 04.01, Cement; Lime; Gypsum. Philadelphia, PA: American Society for 38
- Testing and Materials, (Available from American Society for Testing and Materials, 1916 Race 39
- Street, Philadelphia, PA 19103-1187, 215/299-5400.) 40

ASTM C 1064 - 86 (1993). "Test Method for Temperature of Freshly Mixed Portland Cement

- 2 Concrete," Annual Book of ASTM Standards, Volume 04.02, Concrete and Aggregates.
- 3 Philadelphia, PA: American Society for Testing and Materials. (Available from American Society
- 4 for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)

5 ASTM C 1077 - 95a. "Practice for Laboratories Testing Concrete and Concrete Aggregates for

6 Use in Construction and Criteria for Laboratory Evaluation," Annual Book of ASTM Standards,

7 Volume 04.02, Concrete and Aggregates. Philadelphia, PA: American Society for Testing and

- 8 Materials. (Available from American Society for Testing and Materials, 1916 Race Street,
- 9 Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM D 1556 90. "Test Method for Density and Unit Weight of Soil in Place by the Sand-Cone
 Method," *Annual Book of ASTM Standards, Volume 04.08, Soil and Rock*. Philadelphia, PA:
 American Society for Testing and Materials. (Available from American Society for Testing and
- ¹³ Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM D 2167 94. "Test Method for Density and Unit Weight of Soil in Place by the Rubber
 Balloon Method," *Annual Book of ASTM Standards, Volume 04.08, Soil and Rock*. Philadelphia,
 PA: American Society for Testing and Materials. (Available from American Society for Testing
- and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)

ASTM D 2216 - 92. "Test Method for Laboratory Determination of Water (Moisture) Content of Soil and Rock," *Annual Book of ASTM Standards*, *Volume 04.08*, *Soil and Rock*. Philadelphia,

- PA: American Society for Testing and Materials. (Available from American Society for Testing
- and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM D 2922 91. "Test Methods for Density of Soil and Soil-Aggregate in Place by Nuclear
 Methods (Shallow Depth)," *Annual Book of ASTM Standards, Volume 04.08, Soil and Rock.*Philadelphia, PA: American Society for Testing and Materials. (Available from American Society
 for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM D 3017 88 (1993). "Test Method for Water Content of Soil and Rock in Place by Nuclear
 Methods (Shallow Depth)," *Annual Book of ASTM Standards, Volume 04.08, Soil and Rock.*Philadelphia, PA: American Society for Testing and Materials. (Available from American Society
 for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187, 215/299-5400.)
- ASTM D 4791 95. "Test Method for Flat or Elongated Particles in Coarse Aggregate," Annual
 Book of ASTM Standards, Volume 04.03, Road and Paving Materials; Pavement Management
 Technologies. Philadelphia, PA: American Society for Testing and Materials. (Available from
 American Society for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187,
 215/299-5400.)
- ASTM E 534 91. "Test Methods for Chemical Analysis of Sodium Chloride," Annual Book of
 ASTM Standards, Volume 15.05, Engine Coolants; Halogenated Organic Solvents; Industrial
 Chemicals. Philadelphia, PA: American Society for Testing and Materials. (Available from
 American Society for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103-1187,
 215/299-5400.)
- Brodsky, N.S., F.D. Hansen, and T.W. Pfeifle. 1996. "Properties of Dynamically Compacted
 WIPP Salt," *4th International Conference on the Mechanical Behavior of Salt, Montreal,*

1 *Quebec, June 17-18, 1996.* SAND96-0838C. Albuquerque, NM: Sandia National Laboratories.

- 2 (Copy on file at the Technical Library, Sandia National Laboratories, Albuquerque, NM.)
- 3 Brown, E.R. 1990. "Density of Asphalt Concrete--How Much is Needed?," *Transportation*
- *Research Record No. 1282.* Washington, DC: Transportation Research Board. 27-32. (Copy on file in the SWCF.)
- 6 Callahan, G.D., M.C. Loken, L.D. Hurtado, and F.D. Hansen. 1996. "Evaluation of Constitutive
- 7 Models for Crushed Salt," 4th International Conference on the Mechanical Behavior of Salt,
- 8 Montreal, Quebec, June 17-18, 1996. SAND96-0791C. Albuquerque, NM: Sandia National
- 9 Laboratories. (Copy on file in the SWCF as WPO36449.)
- 10 Cheung, S.C.H., M.N. Gray, and D.A. Dixon. 1987. "Hydraulic and Ionic Diffusion Properties of
- 11 Bentonite-Sand Buffer Materials," Coupled Processes Associated with Nuclear Waste
- 12 Repositories, Proceedings of the International Symposium on Coupled Processes Affecting the

¹³ *Performance of a Nuclear Waste Repository, Berkeley, CA, September 18-20, 1985.* Ed. C-F.

- 14 Tsang. Orlando, FL: Academic Press, Inc. 383-407. (Copy on file in the SWCF.)
- 15 CRD-C 38 73. "Method of Test for Temperature Rise in Concrete," *Handbook for Concrete and*
- *Cement.* Vicksburg, MS: U.S. Army Corps of Engineers, Waterways Experiment Station. (Copy on file in the SWCF as WPO39656.)
- DOE (U.S. Department of Energy). 1995. *Waste Isolation Pilot Plant Sealing System Design Report*. DOE/WIPP-95-3117. Carlsbad, NM: U.S. Department of Energy, Waste Isolation Pilot
- 20 Plant. (Copy on file in the SWCF as WPO29062.)
- EPA (Environmental Protection Agency). 1996a. Criteria for the Certification and Re-
- 22 Certification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal
- Regulations. Response to Comments Document for 40 CFR Part 194. EPA 402-R-96-001.
- 24 Washington, DC: Environmental Protection Agency, Office of Radiation and Indoor Air. (Copy
- on file in the Nuclear Waste Management Library, Sandia National Laboratories, Albuquerque,
 NM.)
- 27 EPA (Environmental Protection Agency). 1996b. Criteria for the Certification and Re-
- 28 Certification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal
- 29 Regulations. Background Information Document for 40 CFR Part 194. EPA 402-R-96-002.
- 30 Washington, DC: Environmental Protection Agency, Office of Radiation and Indoor Air. (Copy
- on file in the Nuclear Waste Management Library, Sandia National Laboratories, Albuquerque,
 NM.)
- ³³ Freeman, H.D., and R.A. Romine. 1994. *Hanford Permanent Isolation Barrier Program: Asphalt*
- *Technology Test Plan.* PNL-9336. Richland, WA: Pacific Northwest Laboratories. (Copy
- available from National Technical Information Service, 5285 Port Royal Road, Springfield, VA,
- ³⁶ 22161, 703/487-4650. Order number: DE94013454.)
- Gray, M.N. 1993. OECD/NEA International Stripa Project. Overview Volume III: Engineered
- Barriers. Stockholm, Sweden: SKB, Swedish Nuclear Fuel and Waste Management Company.
- 39 (Copy on file in the Nuclear Waste Management Library, Sandia National Laboratories,
- 40 Albuquerque, NM as TD898.2 .G73 1993.)

- Hansen, F.D., and E.H. Ahrens. 1996. "Large-Scale Dynamic Compaction of Natural Salt," 4th
- 2 International Conference on the Mechanical Behavior of Salt, Montreal, Quebec, June 17-18,
- 3 1996. SAND96-0792C. Albuquerque, NM: Sandia National Laboratories. (Copy on file in the
- 4 SWCF as WPO39544.)
- 5 IAEA (International Atomic Energy Agency). 1990. Sealing of Underground Repositories for
- 6 Radioactive Wastes. STI/DOC/10/319. Technical Reports Series No. 319. Vienna, Austria:
- 7 International Atomic Energy Agency; Lanham, MD: Unipub. (Copies on file at the Technical
- 8 Library, Sandia National Laboratories, Albuquerque, NM and at Centennial Science and
- 9 Engineering Library, University of New Mexico, Albuquerque, NM.)
- Kjartanson, B.H., N.A. Chandler, A.W.L. Wan, C.L. Kohle, and P.J. Roach. 1992. "Use of a
- 11 Method Specification for In Situ Compaction of Clay-Based Barrier Materials," *High Level*
- 12 Radioactive Waste Management, Proceedings of the Third International Conference, Las
- ¹³ Vegas, NV, April 12-16, 1992. La Grange Park, IL: American Nuclear Society, Inc.; New York,
- 14 NY: American Society of Civil Engineers. Vol. 1, 1129-1136. (Copy on file in the SWCF.)
- 15 Knowles, M.K., and C.L. Howard. 1996. "Field and Laboratory Testing of Seal Materials
- 16 Proposed for the Waste Isolation Pilot Plant," *Proceedings of the Waste Management 1996*
- 17 Symposium, Tucson, AZ, February 25-29, 1996. SAND95-2082C. Albuquerque, NM: Sandia
- 18 National Laboratories. (Copy on file in the SWCF as WPO30945.)
- Mitchell, J.K. 1993. *Fundamentals of Soil Behavior*. 2nd ed. New York, NY: John Wiley & Sons,
 Inc.
- Myers, D.R., and D.A. Duranceau. 1994. Prototype Hanford Surface Barrier: Design Basis
- 22 Document. BHI-00007, Rev. 00. Richland, WA: Bechtel Hanford, Inc. for the U.S. Department of
- 23 Energy, Office of Environmental Restoration and Waste Management. (Copy on file at the
- Nuclear Waste Management Library, Sandia National Laboratories, Albuquerque, NM.)
- Nilsson, J. 1985. "Field Compaction of Bentonite-Based Backfilling," *Engineering Geology*. Vol.
 21, no. 3-4, 367-376. (Copy on file in the SWCF.)
- Onofrei, M., M.N. Gray, W.E. Coons, and S.R. Alcorn. 1992. "High Performance Cement-Based
 Grouts for Use in a Nuclear Waste Disposal Facility," *Waste Management*. Vol. 12, no. 2/3, 133154. (Copy on file in the SWCF.)
- Pfeifle, T.W., F.D. Hansen, and M.K. Knowles. 1996. "Salt-Saturated Concrete Strength and
 Permeability," *4th Materials Engineering Conference, ASCE Materials Engineering Division, Washington, DC, November 11-18, 1996.* Albuquerque, NM: Sandia National Laboratories.)
- ³³ Pusch, R. 1982. "Mineral-Water Interactions and Their Influence on the Physical Behavior of
- Highly Compacted Na Bentonite," *Canadian Geotechnical Journal*. Vol. 19, no. 3, 381-387.
 (Copy on file in the SWCF.)
- Pusch, R., and L. Börgesson. 1989. "Bentonite Sealing of Rock Excavations," Sealing of
- 37 Radioactive Waste Repositories, Proceedings of an NEA/CEC Workshop, Braunschweig,
- 38 Germany, May 22-25, 1989. EUR 12298. Paris: Organisation for Economic Co-Operation and
- ³⁹ Development. 297-308. (Copy on file in the SWCF.)

- Pusch, R., M. Gray, F. Huertas, M. Jorda, A. Barbreau, and R. Andre-Jehan. 1989. "Sealing of
- 2 Radioactive Waste Repositories in Crystalline Rock," *Sealing of Radioactive Waste*
- 3 Repositories, Proceedings of an NEA/CEC Workshop, Braunschweig, Germany, May 22-25,
- 4 1989. EUR 12298. Paris: Organisation for Economic Co-Operation and Development. 214-228.
- 5 (Copy on file in the SWCF.)
- 6 Sandia (Repository Isolation Systems Department 6121). 1996. Waste Isolation Pilot Plant Shaft
- 7 Sealing System Compliance Submittal Design Report. SAND96-1326/1&2. Albuquerque, NM:
- 8 Sandia National Laboratories.
- 9 Wakeley, L.D., P.T. Harrington, and F.D. Hansen. 1995. *Variability in Properties of Salado Mass*
- 10 Concrete. SAND94-1495. Albuquerque, NM: Sandia National Laboratories. (Copy on file in the
- 11 SWCF as WPO22744.)
- Wing, N.R., and G.W. Gee. 1994. "Quest for the Perfect Cap," *Civil Engineering*. Vol. 64, no. 10,
- 13 38-41. (Copy on file in the SWCF as WPO21158.)

FIGURES

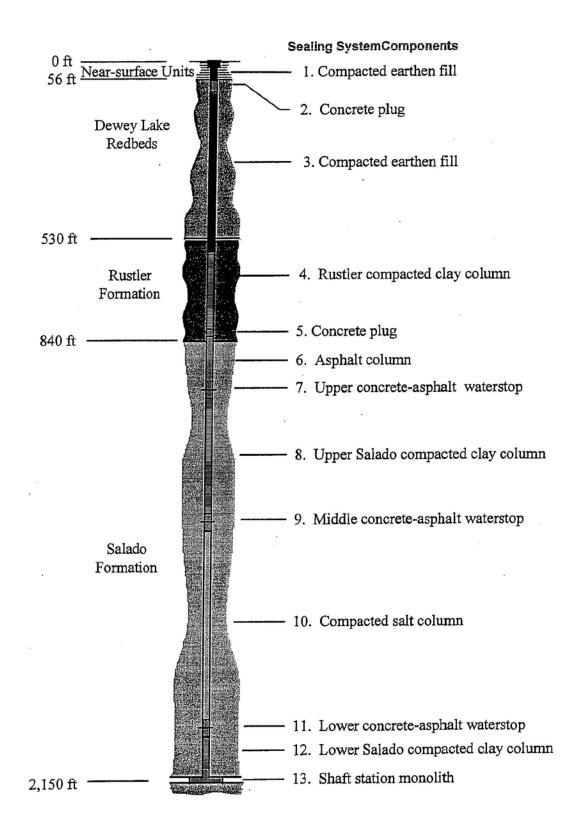


Figure G2A-1 Schematic of the WIPP Shaft Seal Design

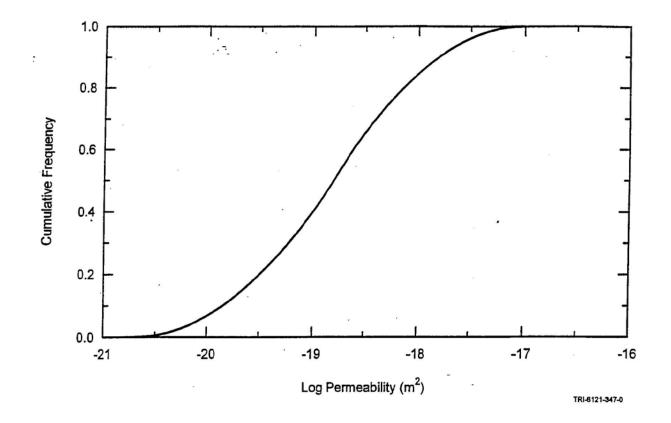


Figure G2A-2 Cumulative Distribution Function for SMC

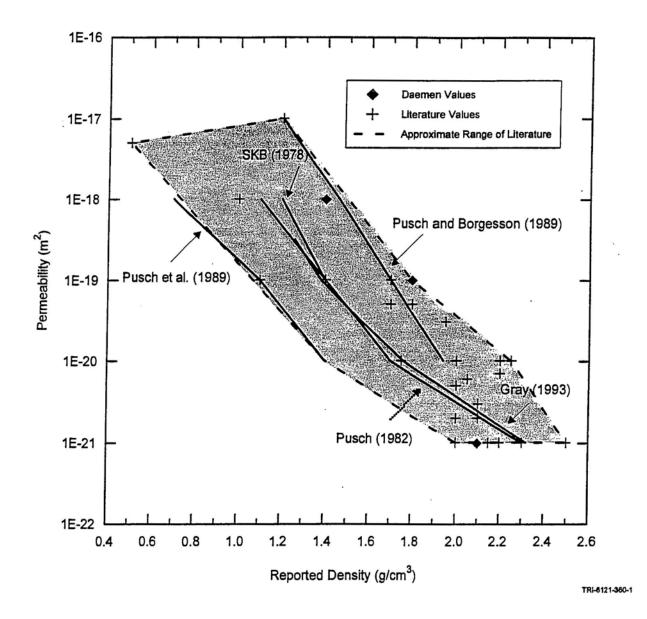


Figure G2A-3 Sodium Bentonite Permeability Versus Density

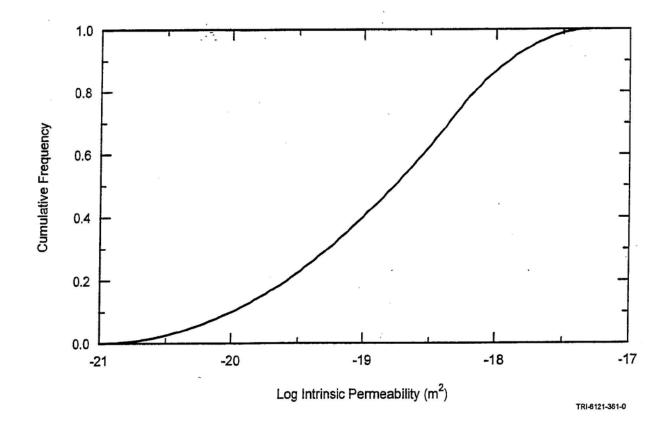


Figure G2A-4 Cumulative Frequency Distribution for Compacted Bentonite

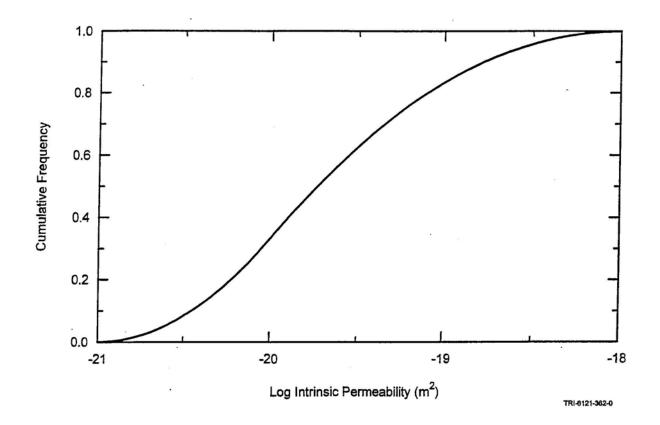


Figure G2A-5 Asphalt Permeability Cumulative Frequency Distribution Function

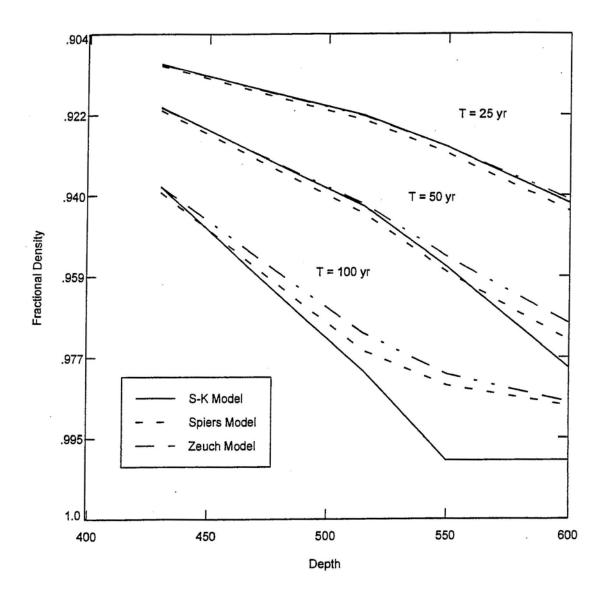


Figure G2A-6 Fractional Density of the Consolidating Salt Column

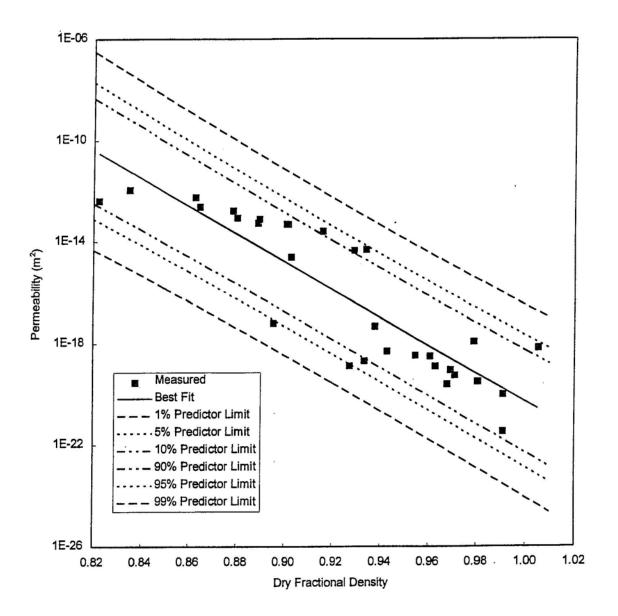


Figure G2A-7 Permeability of Consolidated Crushed Salt as a Function of Fractional Density

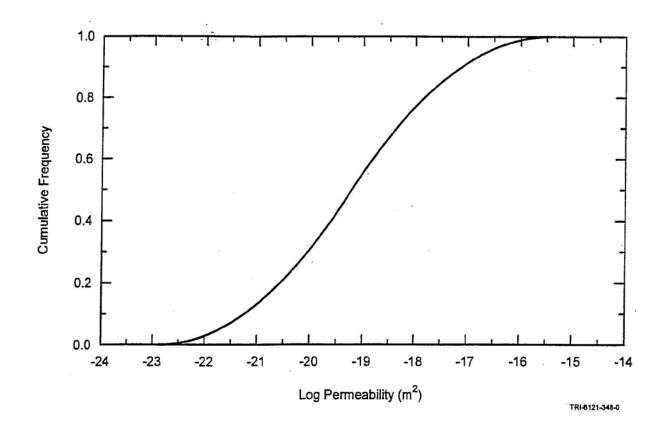


Figure G2A-8 Compacted Salt Column Permeability Cumulative Frequency Distribution Function at Seal Midpoint 100 Years Following Closure

ATTACHMENT G2 APPENDIX B

SHAFT SEALING CONSTRUCTION PROCEDURES

SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

ATTACHMENT G2 APPENDIX B

SHAFT SEALING CONSTRUCTION PROCEDURES

SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT

Appendix B Abstract

This appendix describes equipment and procedures used to construct the shaft seals as specified in Permit Attachment G2. Existing or reasonably modified construction equipment is specified, standard mining practices are applied, and a general schedule is provided at the end of this appendix. This appendix describes the following activities:

- pre-sealing activities for the sub-surface and surface,
- construction and operation of a multi-deck stage,
- installation of special concrete (sumps, shaft station monoliths, and concrete plugs),
- installation of compacted clay columns,
- emplacement and dynamic compaction of WIPP salt,
- installation of neat asphalt and asphaltic mastic mix,
- grouting of concrete plugs and the country rock behind existing shaft liners,
- removal of portions of the existing shaft liners, and
- emplacement of compacted earthen fill.

TABLE OF CONTENTS

B1.	Introd	uction4				
B2.	Projec B2.1 B2.2 B2.3	t Mobilization Subsurface Surface Installation of Utilities				
B3.	Multi-I	Deck Stage		7		
B4.	Place B4.1		aling Materials Shaft Station Monolith Concrete-Asphalt Waterstops Concrete Plugs	9 9 10		
	B4.2	-	Salado and Rustler Compacted Clay Column	10		
	B4.3	Asphalt B4.3.1 B4.3.2	Concrete-Asphalt Waterstops Asphaltic Mastic Mix Column	11		
	B4.4 B4.5	Compacted Salt Column14 Grout				
	B4.6	Compacte B4.6.1 B4.6.2	ed Earthen Fill Lower Section Upper Section	17		
	B4.7	Schedule				
B5.	Refere	References				

FIGURES

2 Figure

Title

- 3 Figure G2B-1 Multi-Deck Stage Illustrating Dynamic Compaction
 - Figure G2B-2 Multi-Deck Stage Illustrating Excavation for Asphalt Waterstop
- 5 Figure G2B-3 Typical Fibercrete at Top of Asphalt
- 6 Figure G2B-4 Drop Pattern for 6-m-Diameter Shaft Using a 1.2-m-Diameter Tamper
- 7 Figure G2B-5 Plan and Section Views of Downward Spin Pattern of Grout Holes
- 8 Figure G2B-6 Plan and Section Views of Upward Spin Pattern of Grout Holes

9

1

1 B1. Introduction

This appendix describes construction specifications for placement of shaft seal materials. 2 Flexibility is incorporated in construction specifications to facilitate placement of several different 3 material types. Engineering materials used to seal the full length of the shaft include earthen fill, 4 compacted clay, tamped crushed salt, asphalt, concrete, and a combination of concrete and 5 asphalt in concrete-asphalt waterstops. Appendix A of Permit Attachment G2 provides details of 6 the materials. A full-length shaft seal of this type has never before been constructed; however, 7 application of available technology and equipment, standard construction practices, and 8 common materials provides confidence that the system can be placed to satisfy the design 9

10 requirements.

A primary feature of the construction specification is development of a work platform from which 11 seal materials are placed. Although the proposed multi-deck stage (galloway) proposed here is 12 engineered specifically for shaft sealing operations, it is similar to stages used for construction 13 of shafts. Inherently flexible, the multi-deck stage facilitates several construction methods 14 required for the various materials specified for the shaft seal system. It provides an assembly of 15 a slickline and header for transport of flowable materials from the surface to the placement 16 horizon. A crane device is attached to the base of the stage to facilitate compaction, and an 17 avenue through the stage provides a means to transport bulk material. It is understood that 18 procedures specified here may change during the tens of years preceding construction as a 19 result of equipment development, additional testing, or design changes. Further, it is 20 acknowledged that the construction methods specified are not the only methods that could 21 place the seal materials successfully. 22

A few assumptions are made for purposes of evaluating construction activities. These 23 assumptions are not binding, but are included to assist discussion of general operational 24 scenarios. For example, four multi-deck stages are specified, one for each shaft. This 25 specification is based on shaft-sinking experience, which indicates that because of the wear 26 encountered, it is advisable to replace rather than rebuild stages. However, much of the 27 equipment on the multi-deck stage is reused. For scheduling purposes, it is assumed that 28 sealing operations are conducted in two of the four shafts simultaneously. The Air Intake and 29 Exhaust Shafts are sealed first, and the Waste and Salt Handling Shafts are sealed last. With 30 this approach, shaft sealing will require about six and a half years, excluding related work 31 undertaken by the WIPP Management and Operating Contractor (MOC). Sealing the shafts 32 sequentially would require approximately eleven and a half years. To facilitate discussion of 33 scheduling and responsibilities, it is assumed that sealing operations will be conducted by a 34 contractor other than the MOC. 35

Years from now, when actual construction begins, it is probable that alternatives may be 36 favored. Therefore, construction procedures note alternative methods in recognition that 37 changes are likely and that the construction strategy is sufficiently robust to accommodate 38 alternatives. This appendix contains both general and very specific information. It begins with a 39 discussion of general mobilization in Section 2. Details of the multi-deck construction stage are 40 provided in Section 3. Section 4 contains descriptions of the construction activities. Information 41 presented here is supplemented by several engineering drawings and sketches contained in 42 Permit Attachment G2, Appendix E. The topical information and the level of provided detail 43 substantiate the theory that reliable shaft seal construction is possible using available 44 technology and materials. 45

1 B2. Project Mobilization

2 The duty descriptions that follow are for discussion purposes. The discussions do not

3 presuppose contractual arrangements, but simply identify tasks necessary for shaft seal

4 construction.

5 B2.1 Subsurface

Prior to initiation of sealing activities, the MOC will remove installations and equipment on the
repository level. A determination of items removed will be made before construction begins.
Such removal would include, but is not limited to, gates and fences at the shaft; equipment such
as winches, ventilation fans, pipelines; and communication and power cables. Additionally, the
following items will be removed from the shafts:

- cables, counterweights, and sheaves;
- existing waterlines; and
- electrical cables not required for sealing operations.

The following equipment will be stored near the shaft on the repository level by the Sealing
 Contractor prior to initiation of sealing activities:

- a concrete header, hopper, and pump;
- a concrete pump line to distribute concrete; and
- an auxiliary mine fan and sufficient flexible ventilation tubing to reach work areas
 required for installation of the shaft station concrete monolith.
- 20 The subsurface will be prepared adequately for placement of the shaft station monolith.
- 21 Determination of other preparatory requirements may be necessary at the time of construction.

22 B2.2 Surface

The MOC will remove surface facilities such as headframes, hoists, and buildings to provide 23 clear space for the Sealing Contractor. Utilities required for sealing activities (e.g., air 24 compressors, water, electrical power and communication lines) will be preserved. The Sealing 25 Contractor will establish a site office and facilities required to support the construction crews, 26 including a change house, lamp room, warehouse, maintenance shop, and security provisions. 27 Locations will be selected and foundations constructed for headframes, multi-deck stage 28 winches, man/equipment hoist, and exhaust fan. A drawing in Permit Attachment G2, Appendix 29 E (Sketch E-4) depicts a typical headframe and associated surface facilities. The hoist and 30 winches will be enclosed in suitable buildings; utilities and ventilation ducting will be extended to 31 the shaft collar. The large ventilation fan located near the collar is designed to exhaust air 32 through the rigid ventilation duct, resulting in the movement of fresh air down the shaft. Air flow 33 will be sufficient to support eight workers to the depth of the repository level. The following 34 facilities will be procured and positioned near the shaft collar: 35

• a concrete batch plant capable of weighing, batching, and mixing the concrete to design specifications;

- a crushing and screening plant to process WIPP salt and local soil;
 - an insulated and heated pug mill, asphalt pump, asphalt storage tank, and other auxiliary equipment; and
- pads, silos, and structures to protect sealing materials from the weather.

The Sealing Contractor will construct a temporary structural steel bulkhead over the shaft at the 5 surface. The bulkhead will be sufficiently strong to support the weight of the multi-deck stage, 6 which will be constructed on it. When the multi-deck stage is completed, the headframe will be 7 erected. The headframe (depicted in Permit Attachment G2, Appendix E, Sketch E-3) will be 8 built around the multi-deck stage, and a mobile crane will be required during fabrication. When 9 the headframe is completed, cables for hoisting and lowering the multi-deck stage will be 10 installed. Cables will run from the three winches, over the sheaves in the headframe, down and 11 under the sheaves on the multi-deck stage, and up to anchors in the headframe. The headframe 12 will be sufficiently high to permit the multi-deck stage to be hoisted until the lowest component is 13 3.05 m (10 ft) above surface. This will facilitate slinging equipment below the multi-deck stage 14 and lowering it to the work surface, as well as activities required at the collar during asphalt 15 emplacement. 16

The multi-deck stage will be lowered to clear the collar, allowing the installation of compressedair-activated steel shaft collar doors, which will serve as a safety device, permitting safe access to the man cage and bucket, while preventing objects from falling down the shaft. Following installation of these doors, workers will utilize the multi-deck stage to traverse the shaft from the collar to the repository horizon, inspecting it for safety hazards and making any necessary repairs. After this inspection, the multi-deck stage will return to the surface.

23 B2.3 Installation of Utilities

2

3

In preparation for placement of shaft seal materials, requisite utilities will be outfitted for 24 operations. The multi-deck stage will descend from the collar to the repository horizon. As 25 added assurance against unwanted water, a gathering system similar to the one currently in 26 place at the bottom of the concrete liner will be installed and moved upward as seal 27 emplacement proceeds. Water collected will be hoisted to the surface for disposal. Additionally, 28 any significant inflow will be located and minimized by grouting. After installation of the water 29 gathering system, the following utilities will be installed from surface to the repository horizon by 30 securely fastening them to the shaft wall: 31

- 5.1-cm steel waterline with automatic shut-off valves every 60 m;
- 10.2-cm steel compressed-air line;
- power, signal, and communications cables;
- 15.2 cm steel slickline and header; and
- a rigid, cylindrical, ventilation duct, which would range from 107 cm in diameter in the three largest shafts to 91 cm in diameter in the Salt Handling Shaft.

1 B3. Multi-Deck Stage

The multi-deck stage (galloway) provides a work platform from which all sealing operations 2 except placement of asphalt are conducted. The concept of using a multi-deck stage is derived 3 from similar equipment commonly employed during shaft sinking operations. Plan and section 4 views of conceptual multi-deck stages are shown in Permit Attachment G2, Appendix E, 5 Sketches E-1 and E-2. The construction decks specified here are modified from typical shaft 6 sinking configurations in two important ways to facilitate construction. Conceptual illustrations of 7 these two modifications are displayed in Figures G2B-1 and G2B-2. Figure G2B-1 illustrates the 8 multi-deck performing dynamic compaction of salt. Figure G2B-2 illustrates the multi-deck stage 9 configured for excavation of the kerf required for the asphalt waterstop in Salado salt. 10 A device called a polar crane mounted below the lower deck can be configured for either 11 dynamic compaction or salt excavation. The crane can rotate 360° horizontally by actuating its 12 geared track drive. Its maximum rotational speed will be approximately two revolutions per 13 minute. The crane can be controlled manually or by computer (computerized control will swiftly 14

position the tamper in the numerous drop positions required for dynamic compaction). When
 excavation for the concrete-asphalt waterstops is required, the tamper, electromagnet, and
 cable used for dynamic compaction will be removed, and a custom salt undercutter will be
 mounted on the polar crane trolley. Geared drives on the crane, trolley, and undercutter will
 supply the force required for excavation. In addition to the special features noted above and
 shown in Figures G2B-1 and G2B-2, the multi-deck stage has the following equipment and
 capabilities:

- Maximum hoisting/lowering speed is approximately 4.6 m (15 ft) per minute.
- A cable, electromagnet, and tamper will be attached to the polar crane during dynamic compaction. The cylindrical tamper consists of A-36 carbon steel plates bolted together with high-tensile-strength steel bolts. It is hoisted and dropped by the polar crane using the electromagnet. The tamper will be mechanically secured to the polar crane before personnel are allowed under it.
- Range-finding lasers will facilitate the accurate positioning of the multi-deck stage
 above the work surface and allow the operator to determine when the surface is
 sufficiently level. The distance indicated by each laser will be displayed on a monitor at
 the crane control station.
- Flood lights and remotely controlled closed-circuit television equipment will enable the crane operator to view operations below the multi-deck stage on a monitor.
- Fold-out floor extensions that accommodate the variance in shaft diameter between the unlined and lined portions of the shaft will be provided for safety.
- A cutout in each deck, combined with a removable section of the polar crane track, will permit stage movement without removal of the rigid ventilation duct (which is fastened to the shaft wall).

1 The multi-deck stage is equipped with many of the features found on conventional shaft sinking 2 stages, such as:

- three independent hoisting/lowering cables,
- man and material conveyances capable of passing through the multi-deck stage and accessing the working surface below,
- a jib crane that can be used to service the working surface below,
- 7 removable safety screens and railings, and
- centering devices.

Three sets of double locking devices are provided to secure the multi-deck stage to the shaft
 wall. A suitable factor of safety for these locking devices is judged to be 4. The area of the grips
 securing the deck is calculated from static principles:

$$FS = \mu(Co)(A)/W \tag{B-1}$$

13 where:

12

- 14 FS = factor of safety
- 15 μ = steel/salt friction coefficient = 0.15 (see Table 20.1 in McClintock and Aragon, 1966; 16 and Van Sambeek, 1988)
- 17 Co = compressive strength of WIPP salt, which varies from 172 kg/cm² to 262 kg/cm² (Van Sambeek, 1988)
- 19 W = total vertical weight
- A =total gripper pad surface area.

Manipulating the equation to solve for required area, applying a factor of safety of 4, selecting the heaviest work stage (753,832 kg) and the minimum compressive strength value for salt (assuming that the locking pressure equals the minimum compressive strength of salt), the following gripper surface area (*A*) is:

A = $4(753,832 \text{ kg})/0.15(172 \text{ kg/cm}^2) = 11,416.5 \text{ cm}^2$, and each of the six gripper pads would be 1902.8 cm².

As designed, each gripper pad area is 2167.2 cm², resulting in a factor of safety (*FS*) of 4.56. Additionally, although tension in the hoisting cables is relaxed while the multi-deck stage is in the locked configuration, the cables are still available to hold the work-deck, should the locking devices fail.

31 **B4. Placement of Sealing Materials**

Construction activities include placement of materials in three basic ways: (1) by slickline (e.g.,
 concrete and asphalt), (2) by compaction (e.g., salt and earthen fill), and (3) by physical
 placement (e.g., clay blocks). Materials will be placed at various elevations using identical
 procedures. Because placement procedures generally are identical regardless of elevation, they

1 will be described only once. Where differences occur, they will be identified and described. In

2 general, placement of shaft seal elements is described from bottom to top.

3 B4.1 Concrete

Concrete is used as a seal material for several different components, such as the existing 4 sumps in the Salt Handling Shaft and the Waste Shaft, the shaft station monoliths, concrete 5 plugs, and concrete-asphalt waterstops. Existing sumps are shown in Permit Attachment G2, 6 Appendix E, Drawings SNL-007, Sheets 6 and 21. Shaft station monoliths are shown in 7 Drawings SNL-007, Sheets 6, 11, 16, and 21. Concrete plugs are depicted on Drawings SNL-8 007. Sheets 4, 5, 9, 10, 14, 15, 19, and 20, Lower, middle, and upper concrete-asphalt 9 waterstops are shown in Drawing SNL-007, Sheet 22. Construction material for all concrete 10 members will be Salado Mass Concrete (SMC). 11

As specified, all SMC will be mixed on surface to produce a product possessing the 12 characteristics defined in Permit Attachment G2, Appendix A. Concrete will be transferred to its 13 placement location within the shaft via slickline and header. The slickline (shown in Figure G2B-14 1) is a steel pipe fastened to the shaft wall. Vertical drops as great as 656 m to the repository 15 horizon are required. Such concrete transport and construction are common in mining 16 applications. For example, a large copper mine in Arizona is placing concrete at a depth of 797 17 m using this procedure. A header attached to the bottom of the slickline is designed to absorb 18 kinetic energy generated by the falling material. The header, a steel pipe slightly larger in 19 diameter than the slickline and made of thicker steel, diverts the flow 45°, absorbing most of the 20 impact. Because the drop generates considerable force, the header will be securely supported 21 by a reinforced steel shelf bolted to the shaft wall. A flexible hose, in sections approximately 3 m 22 long and joined by guick-connect fittings, will be attached to the header. 23

24 B4.1.1 Shaft Station Monolith

Construction of the shaft station monoliths is preceded by filling two existing sumps with SMC.
 Initially, sufficient hose will be used to convey the concrete to the bottom of the sump. The
 discharge will remain below the concrete surface during placement to minimize air entrainment.
 Sections of hose will be withdrawn and removed as the SMC rises to the floor of the repository
 horizon in a continuous pour. Subsequent to filling the sump, arrangements will be made to
 place the concrete monolith.

A small mine fan will be located above the rigid suction-duct inlet to ensure a fresh air base. 31 Masonry block forms will be constructed at the extremities of the shaft station monolith in the 32 drifts leading from the station. Temporary forms, partially filling the opening, will be erected at 33 the shafts to facilitate the placement of the outermost concrete. These temporary forms will 34 permit access necessary to ensure adequate concrete placement. SMC will be transported via 35 the slickline to the header, which will discharge into a hopper feeding the concrete pump, and 36 the pump will be attached to the pumpcrete line. The pumpcrete line, suspended in cable slings 37 near the back of the drifts, will be extended to the outer forms. A flexible hose, attached to the 38 end of the pumpcrete line, will be used by workers to direct emplacement. The pumpcrete line 39 will be withdrawn as emplacement proceeds toward the shaft. 40

When the concrete has reached the top of the temporary forms, they will be extended to seal the openings completely, and two 5-cm-diameter polyvinyl chloride (PVC) pipes will be incorporated in the upper portion of each form. Both pipes will be situated in a vertical plane

oriented on the long axis of the heading and inclined away from the station at approximately 70° 1 2 to the horizontal. The upper end of the top pipe will extend to just below the back, and the upper end of the lower pipe will be located just below that of the top pipe. SMC will be injected through 3 the lower pipe until return is obtained from the upper pipe, ensuring that the heading has been 4 filled to the back. The header will then be moved to a position in the shaft above the designed 5 elevation at the top of the shaft station monolith and supported by a bracket bolted to the shaft 6 wall. After the outer concrete has achieved stability, the temporary interior forms may be 7 removed. Equipment no longer required will be slung below the multi-deck stage and hoisted to 8 surface for storage and later use. The station and shaft will be filled to design elevation with 9 concrete via the slickline, header, and flexible hose. The slickline is cleaned with spherical, 10 neoprene swabs ("pigs") that are pumped through the slickline, header, and hose. 11

12 **B4.1.2 Concrete-Asphalt Waterstops**

Lower, middle, and upper concrete-asphalt waterstops in a given shaft are identical and consist 13 of two SMC sections separated by an asphalt waterstop. Before the bottom member of the 14 lower concrete component is placed, the multi-deck stage will be raised into the headframe; the 15 polar crane will be mounted below the lower deck; and the salt undercutter will be mounted on 16 the crane trolley. The multi-deck stage will then return to the elevation of the concrete 17 component. Two undercutter bars will be used to make the necessary excavations for upper, 18 middle, and lower asphalt-concrete waterstops and the concrete plug above the Salado 19 Formation. Notches for the plugs will be excavated using a short, rigid cutter bar (length less 20 than half the radius). The kerf for the asphalt waterstop will be excavated using a long cutter bar 21 that can excavate the walls to a depth of one shaft radius. These operations will be conducted 22 as required as seal placement proceeds upward. 23

The lower concrete member (and all subsequent concrete entities) will be placed via the 24 slickline, header, and flexible hose, using the procedure outlined for the shaft station monolith. 25 Construction of vertical shaft seals provides the ideal situation for minimizing interface 26 permeability between the rock and seal materials. Concrete will flow under its own weight to 27 provide intimate contact. A tight cohesive interface was demonstrated for concrete in the small-28 scale seal performance tests (SSSPTs). The SSSPT concrete plugs were nearly impermeable 29 without grouting. However, interface grouting is usually performed in similar construction, and it 30 will be done here in the appropriate locations. 31

32 B4.1.3 Concrete Plugs

An SMC plug, keyed into the shaft wall, is situated a few meters above the upper Salado contact in the Rustler Formation. A final SMC plug is located a few meters below surface in the Dewey Lake Redbeds. This plug is emplaced within the existing shaft liner using the same construction technique employed for the concrete-asphalt waterstops.

37 **B4.2 Clay**

38 B4.2.1 Salado and Rustler Compacted Clay Column

Blocks of sodium bentonite clay, precompacted to a density of 1.8 to 2.0 g/cm³, will be the

sealing material. This density has been achieved at the WIPP using a compaction pressure of

41 492.2 kg/cm² in a machine designed to produce adobe blocks (Knowles and Howard, 1996).

Blocks are envisioned as cubes, 20.8 cm on the edge, weighing approximately 18 kg, a

reasonable weight for workers to handle. The bentonite blocks will be compacted at the WIPP in

a new custom block-compacting machine and will be stored in controlled humidity to prevent

3 desiccation cracking. Blocks will be transported from surface in the man cage, which will be

4 sized to fit through the circular "bucket hole" in the multi-deck stage. The conveyance will be

5 stacked with blocks to a height of approximately 1.8 m.

6 Installation will consist of manually stacking individual blocks so that all interfaces are in contact.

7 Block surfaces will be moistened with a spray of potable water as the blocks are placed to

8 initiate a minor amount of swelling, which will ensure a tight fit and a decrease in permeability.

9 Peripheral blocks will be trimmed to fit irregularities in the shaft wall and placed as close to the wall as possible. Trimmed material will be manually removed with a vacuum. Dry bentonite will

wall as possible. Trimmed material will be manually removed with a vacuum. Dry bentonite
 be manually tamped into remaining voids in each layer of blocks. This procedure will be

repeated throughout the clay column. The multi-deck stage will, in all cases, be raised and

13 utilities removed to the surface as emplacement of sealing materials proceeds upward.

Dynamic compaction construction is an alternative method of clay emplacement that could be considered in the detailed design. Dynamic compaction materials being considered are:

- sodium bentonite/fine silica sand, and
- highly compressed bentonite pellets.

Boonsinsuk et al. (1991) developed and tested a dynamic (drop hammer) method for a relatively large diameter (0.5-m) hole, simulated with a steel cylinder, that gave very good results on 1 : 1 dry mass mixtures of sodium bentonite and sand, at a moisture content of 17% to 19%. The

21 alternatives have the advantages of simplifying emplacement.

22 B4.3 Asphalt

Asphalt, produced as a distillate of petroleum, is selected as the seal material because of its longevity, extremely low permeability, history of successful use as a shaft lining material, and its ability to heal if deformed. Shielded from ultraviolet radiation and mixed with hydrated lime to inhibit microbial degradation, the longevity of the asphalt will be great. Emplaced by tremie line at the temperature specified, the material will be fluid and self-leveling, ensuring complete contact with the salt.

Construction of an asphalt column using heated asphalt will introduce heat to the surrounding
salt. The thermal shock and heat dissipation through the salt has not been studied in detail.
Performance of the asphalt column may be enhanced by the introduction of the heat that results
from acceleration of creep and healing of microfractures. If, upon further study, the
thermomechanical effects are deemed undesirable or if an alternative construction method is
preferred at a later date, asphalt can readily be placed as blocks. Asphalt can "cold flow" to fill
gaps, or the seams between blocks can be filled with low-viscosity material.

36 B4.3.1 Concrete-Asphalt Waterstops

37 Electrically insulated, steel grated flooring will be constructed over the shaft at the surface. A

second, similar flooring will be built in the shaft 3 m below the first. These floors will be used

only during the emplacement of asphalt and asphaltic mastic mix (AMM) and will be removed at

all other times. A 12.7-cm ID/14-cm OD, 4130 steel pipe (tremie line) in 3-m lengths will be
 electrically equipped for impedance heating, then insulated and suspended in the shaft from

slips (pipe holding devices) situated on the upper floor. The tremie line cross-sectional area is 1

2 smallest at the shoulder of the top thread, where tensional yield is 50,000 kg; the line weight is

20.8 kg/m. Heavier weights are routinely suspended in this manner in the petroleum and mining 3

industries. 4

28

Neat, AR-4000-graded petroleum-based asphalt cement will be the sealing material for asphalt 5 waterstops. Neat asphalt from the refinery will be delivered to the WIPP at approximately 80°C 6 in conventional, insulated refinery trucks and pumped into a heated and insulated storage tank 7 located near the shaft. The multi-deck stage will be hoisted into the headframe and 8 mechanically secured for safety. Asphalt, heated to 180°C ±5°, will be pumped down the shaft 9 to the fill elevation through the heated tremie line. Viscosity of the neat asphalt for the 10 waterstops will be sufficiently low to allow limited penetration of the DRZ. Installation of asphalt 11 in each of the concrete-waterstops is identical. 12

As the pipe is lowered, workers on the lower deck will attach the wiring required for heating 13 circuits and apply insulation. Workers on the top deck will install flanged and electrically 14 insulated couplings as required (the opening in the slip bowl will be large enough to permit the 15 passage of these couplings). Properly equipping and lowering the pipe should progress at the 16 rate of one section every 10 minutes. The lower asphalt waterstop requires approximately 607 17 m of pipe for a casing weight of 12,700 kg. Additionally, electrical wire and insulation will weigh 18 about 7250 kg for a total equipped tremie line weight of 20,000 kg. Therefore, the safety factor 19 for the tremie line is 50,000 kg/20,000 kg, or 2.5. 20

To minimize air entrainment, the lower end of the tremie line will be immersed as much as 1 m 21 during hot asphalt emplacement. Therefore, the lower 3 m of casing will be left bare (to simplify 22 cleaning when emplacement has been completed). 23

Initially the tremie line will be lowered until it contacts the concrete plug (immediately underlying 24 the excavation for the waterstop) and then raised approximately 0.3 m. Asphalt emplacement 25 will proceed as follows: 26

- The impedance heating system will be energized, heating the tremie line to $180^{\circ}C \pm 5^{\circ}$. • 27 and the asphalt in the storage tank will be heated to approximately $180^{\circ}C \pm 5^{\circ}$.
- Heated, neat asphalt will be pumped down the tremie line at a rate approximating • 29 13 L/min. This low rate will ensure that the asphalt flows across the plug from the 30 insertion point, completely filling the excavation and shaft to the design elevation. 31
- The tremie line will be raised 3 m and cleaned by pumping a neoprene swab through it • 32 with air pressure. Impedance heating will be stopped, and the line will be allowed to 33 cool. When cool, the line will be hoisted, stripped, cleaned, disassembled, and stored 34 for future use. 35

36 Sealing operations will be suspended until the air temperature at the top of the asphalt has fallen to approximately 50°C for the comfort of the workers when they resume activity at the fill 37 horizon. Temperature will be determined by lowering a remotely read thermometer to an 38 elevation approximately 3 m above the asphalt at the center of the shaft. The temperature of the 39 asphalt at the center of the shaft will be 50°C in about a month, but active ventilation should 40 permit work to resume in about two weeks (see calculations in Appendix D of Waste Isolation 41

Pilot Plant Shaft Sealing System Compliance Submittal Design Report ("Compliance Submittal
 Design Report") (Sandia, 1996)).

When sufficient cooling has occurred, workers will descend in the multi-deck stage and cover the hot asphalt with an insulating and structural material such as fiber-reinforced shotcrete, as illustrated in Figure G2B-3. To accomplish this, they will spray cementitious shotcrete containing fibrillated polypropylene fibers (for added tensional strength), attaining a minimum thickness of approximately 0.6 m.

8 **B4.3.2 Asphaltic Mastic Mix Column**

Asphaltic mastic mix (AMM) for the column will be prepared on surface in a pug mill. Viscosity of
 the AMM can be tailored to provide desired properties such as limited migration into large
 fractures.

- AMM will be prepared by mixing the ingredients in the pug mill, which has been heated to 180°C ±5°. The mix will be pumped from the pug mill through the tremie line to the emplacement depth. AMM is self-leveling at this temperature, and its hydrostatic head will ensure intimate contact with the shaft walls.
- Pumping rate will be approximately 200 L/min for efficiency, because of the larger volume (approximately 1,224,700 L in the Air Intake Shaft). To facilitate efficient emplacement and avoid air entrainment, the tremie line will not be shortened until the mix has filled 6 vertical meters of the shaft. Back pressure (approximately 0.84 kg/cm²) resulting from 6 m of AMM above the discharge point will be easily overcome from surface by the hydraulic head.
- After 6 vertical meters of AMM have been placed:
- Impedance heating current will be turned off and locked out (the hot line will drain completely).
- To prevent excessive back pressure resulting from AMM above the insertion point, the line will be disconnected from the pump and hoisted hot. Two sections will be stripped, removed, cleaned with a "pig," and stacked near the shaft.
- Electrical feed will be adjusted (because of the decreased resistance of the shortened line).
- The tremie line will be reconnected to the pump.
- The impedance heating system will be energized.
- When the temperature of the line has stabilized at 180°C ±5°, pumping will resume.

This procedure will be followed until the entire column, including the volume computed to counteract 0.9 m of vertical shrinkage (calculations in Appendix D of the Compliance Submittal Design Report (Sandia, 1996)), has been placed. The line will be disconnected from the pump and cleaned by pumping "pigs" through it with air pressure. It will then be hoisted, stripped, removed in 3-m sections, and stacked on surface for reuse. 1 Sealing operations will be suspended following removal of the tremie line, and ventilation will be

- 2 continuous to speed cooling. The column will shrink vertically but maintain contact with the shaft
- 3 walls as it cools. When the air temperature at 3 m above the asphalt has cooled sufficiently,
- 4 workers will descend on the multi-deck stage and cover the hot asphalt with fibercrete as
- 5 described for the concrete-asphalt waterstop (Permit Attachment G2, Appendix B, Section
- 6 B4.3.1) and illustrated in Figure G2B-3.

7 Note: Near the top of the Salado Formation, portions of the concrete liner key, chemical seal rings, and concrete and steel shaft liners will be removed. Liner removal will occur before 8 emplacement of AMM. For safety, exposed rock will be secured with horizontal, radial rock bolts 9 and cyclone steel mesh. A range-finding device, fastened to the shaft wall approximately 3 m 10 above the proposed top of the asphaltic column, will indicate when the hot AMM reaches the 11 desired elevation. A remotely read thermometer, affixed to the shaft wall approximately 2 m 12 above the proposed top of the column, will show when the air temperature has fallen sufficiently 13 to resume operations. The intake of the rigid ventilation duct will be positioned approximately 14 3 m above the proposed top of the column, and ventilation will be continuous throughout 15 emplacement and cooling of the asphaltic column. After the multi-deck stage has been hoisted 16 into the headframe and mechanically secured for safety, emplacement of AMM will proceed. 17

18 B4.4 Compacted Salt Column

Crushed, mine-run salt, dynamically compacted against intact Salado salt, is the major long-19 term shaft seal element. As-mined WIPP salt will be crushed and screened to a maximum 20 particle dimension of 5 mm. The salt will be transferred from surface to the fill elevation via the 21 slickline and header. A flexible hose attached to the header will be used to emplace the salt, 22 and a calculated weight of water will be added. After the salt has been nominally leveled, it will 23 be dynamically compacted. Dynamic compaction consists of compacting material by dropping a 24 tamper on it and delivering a specified amount of energy. The application of three times 25 Modified Procter Energy (MPE) to each lift (one MPE equals 2,700,000 Joules/m³) will result in 26 compacting the salt to 90% of the density of in-place rock salt. 27

Approximately 170 vertical meters of salt will be dynamically compacted. Dynamic compaction 28 was validated in a large-scale demonstration at Sandia National Laboratories during 1995. As-29 mined WIPP salt was dynamically compacted to 90% density of in-place rock salt in a cylindrical 30 steel chamber simulating the Salt Handling Shaft (Ahrens and Hansen, 1995). Depth of 31 compaction is greater than that achieved by most other methods, allowing the emplacement of 32 thicker lifts. For example, dropping the 4.69 metric ton tamper 18 m (as specified below) results 33 in a compaction depth of approximately 4.6 m, allowing emplacement of lifts 1.5-m high. Most 34 other compaction methods are limited to lifts of 0.3 m or less. Lift thickness will be increased 35 and drop height decreased for the initial lift above the concrete plug at the base of the salt 36 column to ensure that the concrete is not damaged. Drop height for the second and third lifts will 37 be decreased as well. Although the tamper impact is thereby reduced, three MPE will be 38 delivered to the entire salt column. 39

If lifts are 1.5-m thick, the third lift below the surface will receive additional densification during compaction of overlying lifts, and this phenomenon will proceed up the shaft. Construction will begin by hoisting the multi-deck stage to the surface and attaching the cable, electromagnet, and tamper to the hoist on the polar crane. The multi-deck assembly will be lowered to the placement elevation, and moisture content of the crushed and screened salt will be calibrated. Then the salt will be conveyed at a measured rate via a weighbelt conveyor to a vibrator-

equipped hopper overlying the 15.2-cm ID slickline. The salt will pass down the slickline and exit
a flexible hose connected to the header. A worker will direct the discharge so that the upper
surface of the lift is nominally level and suitable for dynamic compaction. A second worker will
add potable water, in the form of a fine spray, to the salt as it exits the hose. Water volume will
be electronically controlled and coordinated with the weight of the salt to achieve the desired
moisture content.

7 The initial lift above the SMC will be 4.6 m, and drop height will be 6 m. This increased lift thickness and reduced drop height are specified to protect the underlying SMC plug from 8 damage and/or displacement from tamper impact. Compaction depth for a drop height of 6 m is 9 approximately 3.7 m. Ultimately, the tamper will be dropped six times in each position, resulting 10 in a total of 132 drops per lift in the larger shafts. The drop pattern is shown in Figure G2B-4. A 11 salt lift 1.5 m high will then be placed and leveled. Following compaction of the initial lift, the 12 multi-deck stage will be positioned so the base of the hoisted tamper is 10 m above the surface 13 of the salt. 14

15 The multi-deck stage will then be secured to the shaft walls by activating hydraulically powered

locking devices. Hydraulic pressure will be maintained on these units when they are in the

17 locked position; in addition, a mechanical pawl and ratchet on each pair will prevent loosening.

The safety factor for the locking devices has been calculated to be approximately 4.5. After

locking, tension in the hoisting cables will be relaxed, and centering rams will be activated to
 level the decks. Prior to positioning the stage, tension will be applied to the hoisting cables; the

level the decks. Prior to positioning the stage, tension will be applied to the hoisting cal
 centering rams will be retracted; and the locking devices will be disengaged.

The work deck will be hoisted until the base of the retracted tamper is 23 m above the surface of the salt, where it will be locked into position and leveled as described above. This procedure, repeated throughout the salt column, allows emplacement and compaction of three lifts (1.5-m thick) per multi-deck stage move. Depth of compaction for a drop height of 18 m is approximately 4.6 m. Therefore the third lift below the fill surface will receive a total of 9 MPE (274,560 m kg/m³), matching the energy applied in the successful, large-scale demonstration.

The compactive effect expands laterally as it proceeds downward from the base of the tamper and will effectively compact the salt into irregularities in the shaft wall, as demonstrated in the large-scale demonstration. Although other techniques could be used, dynamic compaction was selected because it is simple, can be used in the WIPP shafts, and has been demonstrated (Hansen and Ahrens, 1996).

The tamper will be dropped from the hoisted position by turning off the power to the electromagnet. Immediately upon release, the crane operator will "chase" the tamper by lowering the electromagnet at twice hoisting speed; the magnet will engage the tamper, allowing it to be hoisted for the subsequent drop. Initially, the tamper will be dropped in positions that avoid impact craters caused by preceding drops. The surface will then be leveled manually and the tamper dropped in positions omitted during the previous drop series.

Experience gained during the large-scale salt compaction demonstration indicated that a considerable volume of dust is generated during the emplacement of the salt, but not during dynamic compaction. However, because the intake of the rigid vent duct is below the multi-deck stage, workers below the stage will wear respirators during emplacement. They will be the only workers affected by dust during dynamic compaction. 1 The Air Intake Shaft will require 22 drop positions (Figure G2B-4). Application of one MPE

2 requires six drops in each position, for a total of 132 drops per lift. Three MPE, a total of 396

drops per lift, will be applied to all salt. After each compaction cycle, the salt surface will be

4 leveled manually and the tamper will be dropped in positions omitted in the preceding drop

5 series. Two lifts, each 1.8 m high, will then be sequentially placed, leveled, and compacted with

6 two MPE, using a 6-m drop height.

7 Dynamic compaction ensures a tight interface. Salt compacted during the large-scale dynamic

8 compaction demonstration adhered so tenaciously to the smooth interior walls of the steel

⁹ compaction chamber that grinders with stiff wire wheels were required for its removal.

10 **B4.5 Grout**

Ultrafine sulfate-resistant cementitious grout (Ahrens et al., 1996) is selected as the sealing material. Specifically developed for use at the WIPP, and successfully demonstrated in an in situ test, the hardened grout has a permeability of 1×10^{-21} m². It has the ability to penetrate fractures smaller than 6 microns and is being used for the following purposes:

- to seal many of the microfractures in the DRZ and ensure a tight interface between
 SMC and the enclosing rock, and
- to solidify fractured rock behind existing concrete shaft liners, prior to removal of the
 liner (for worker safety).

The interface between concrete plugs in the Salado Formation (and one in the Rustler Formation, a short distance above the Salado) will be grouted. A 45° downward-opening cone of reverse circulation diamond drill holes will be collared in the top of the plugs, drilled in a spin pattern (see Figure G2B-5), and stage grouted with ultrafine cementitious grout at 3.5 kg/cm² below lithostatic pressure. Stage grouting consists of:

- drilling and grouting primary holes, one at a time;
- drilling and grouting secondary holes, one at a time, on either side of the primary holes
 that accepted grout; and
- (if necessary) drilling and grouting tertiary holes on either side of secondary holes that
 accepted grout.

Note: For safety, all liner removal tasks will be accomplished from the bottom deck. In areas
 where the steel liner is removed, it will be cut into manageable pieces with a cutting torch and
 hoisted to the surface for disposal. Mechanical methods will be employed to clean and roughen

the existing concrete shaft liner before placing the Dewey Lake SMC plug in the shafts.

The work sequence will start 3 m below the lower elevation of liner removal. A 45° upwardopening cone of grout injection holes, drilled in a "spin" pattern (Figure G2B-6), will be drilled to a depth subtending one shaft radius on a horizontal plane. These holes will be stage grouted as described in Section 4.5. Noncoring, reverse circulation, diamond drill equipment will be used to avoid plugging fractures with fine-grained diamond drill cuttings. Ultrafine cementitious grout will be mixed on the surface, transferred via the slickline to the upper deck of the multi-deck stage, and injected at 3.5 kg/cm² gage below lithostatic pressure to avoid hydrofracturing the rock. 1 Grout will be transferred in batches, and after each transfer, a "pig" will be pumped through the

- 2 slickline and header to clean them. Grouting will proceed upward from the lowest fan to the
- highest. Recent studies conducted in the Air Intake Shaft (Dale and Hurtado, 1996) show that
- 4 this hole depth exceeds that required for complete penetration of the Disturbed Rock Zone
- 5 (DRZ). Maximum horizontal spacing at the ends of the holes will be 3 m.
- 6 The multi-deck stage will then be raised 3 m and a second fan, identical to the first, will be
- 7 drilled and grouted. This procedure will continue, with grout fans 3 m apart vertically, until the
- ⁸ highest fan, located 3 m above the highest point of liner removal, has been drilled and grouted.
- 9 Ultrafine cementitious grout was observed to penetrate more than 2 m in the underground
- 10 grouting experiment conducted at the WIPP in Room L-3 (Ahrens and Onofrei, 1996).

When grouting is completed, the multi-deck stage will be lowered to the bottom of the liner 11 removal section and a hole will be made through the concrete liner. This hole, approximately 30 12 cm in diameter, will serve as "free-face" to which the liner will be broken. Similar establishment 13 and utilization of free face is a common practice in hard rock mining (e.g., the central drill hole in 14 a series drilled into the rock to be blasted is left empty and used as free-face to which 15 explosives in adjacent holes break the rock). Radial, horizontal percussion holes will be drilled 16 on a 30-cm grid (or less, if required), covering the liner to be removed. Hydraulic wedges, 17 activated in these holes, will then break out the liner, starting adjacent to the free face and 18 progressing away from it, from the bottom up. Broken fragments of the concrete liner will fall to 19

20 the fill surface below.

A mucking "claw," suspended from the trolley of the polar crane, will collect the broken concrete and place it in the bucket for removal to the surface. As many as three buckets can be used to speed this work.

24 **B4.6 Compacted Earthen Fill**

Local soil, screened to a maximum particle dimension of 13 mm, will be placed and compacted to inhibit the migration of surficial water into the shaft cross section. Such movement is further decreased by a 12-m high SMC plug at the top of the Dewey Lake Redbeds.

28 B4.6.1 Lower Section

- 29 Emplacement of the compacted earthen fill will proceed as follows:
- Moisture content of the screened soil will be determined.
- The soil will then be transferred via the slickline, header, and flexible hose from surface to the fill elevation. The moisture content optimal for compaction will be achieved using the same procedure as described for compacted salt (Permit Attachment G2, Appendix B, Section B4.4). The soil will be emplaced in lifts 1.2 m high (depth of compaction is approximately 3.7 m) and dynamically compacted using a drop height of 18.3 m.
- The fill will be dynamically compacted until its hydraulic conductivity to water is nominally equivalent to that of the surrounding formation.

1 This procedure will continue until the lower section has been emplaced and compacted. Care

2 will be exercised at the top of the column to ensure that all soil receives sufficient compaction.

3 B4.6.2 Upper Section

4 The upper section contains insufficient room to employ dynamic compaction. Therefore the

5 screened soil, emplaced as described above, will be compacted by vibratory-impact sheepsfoot

6 roller, vibratory sheepsfoot roller, or a walk-behind vibratory-plate compactor. Because of the

7 limited compaction depth of this equipment, lifts will be 0.3 m high. The top of the fill will be

8 coordinated with the MOC to accommodate plans for decommissioning surface facilities and

9 placing markers.

10 B4.7 Schedule

11 Preliminary construction schedules are included on the following pages. The first schedule is a

concise outline of the total construction schedule. It is followed by individual schedules for each

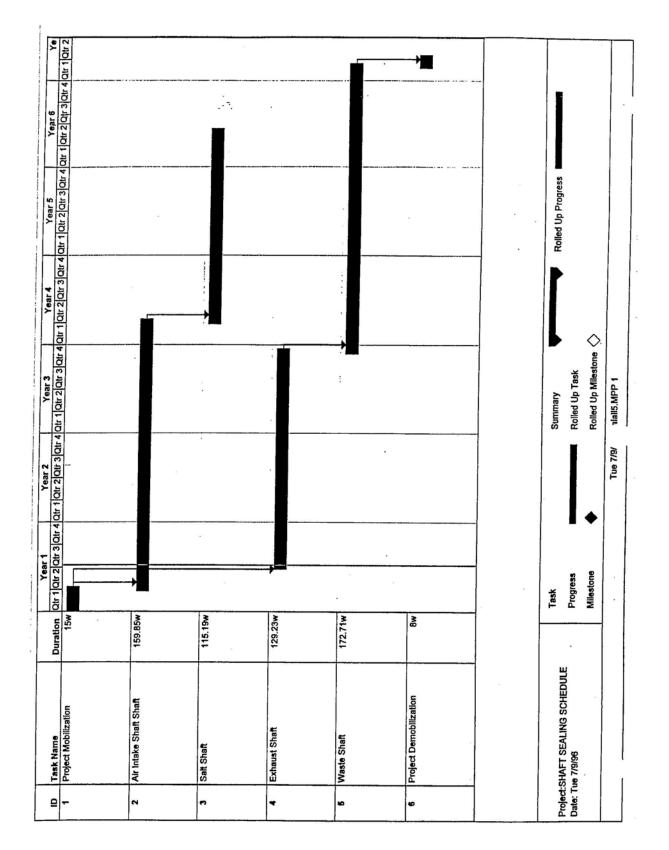
13 shaft. The first schedule in each shaft series is a truncated schedule showing the major

14 milestones. The truncated schedules are followed by detailed construction schedules for each

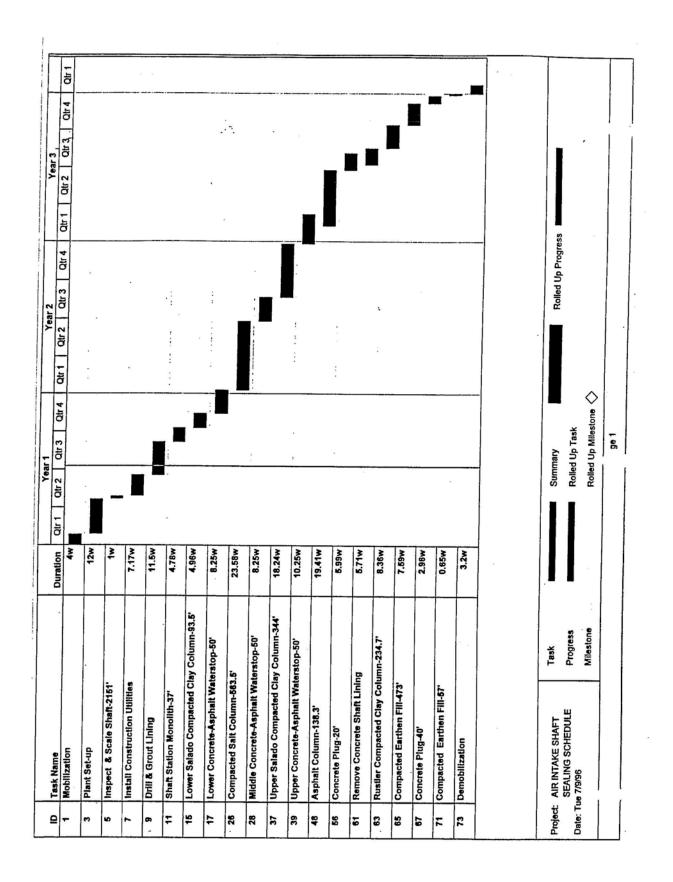
15 shaft. These schedules indicate that it will take approximately six and a half years to complete

the shaft sealing operations, assuming two shafts are simultaneously sealed.

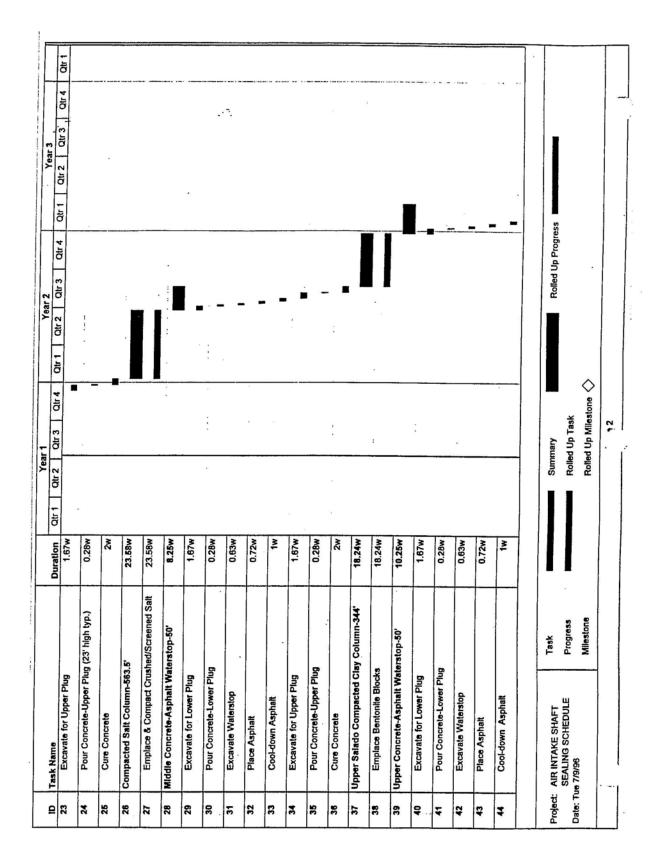
SEALING SCHEDULE - ALL SHAFTS

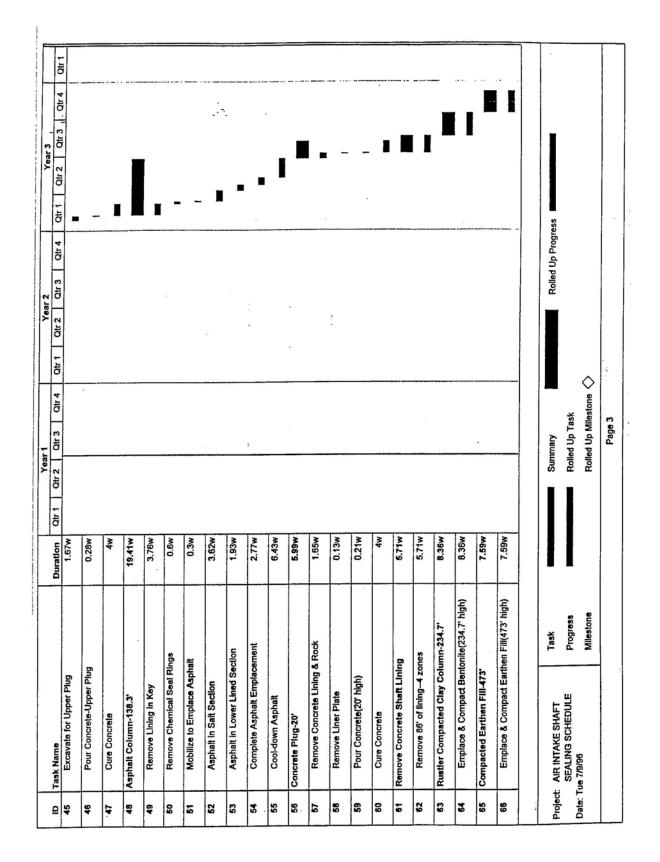


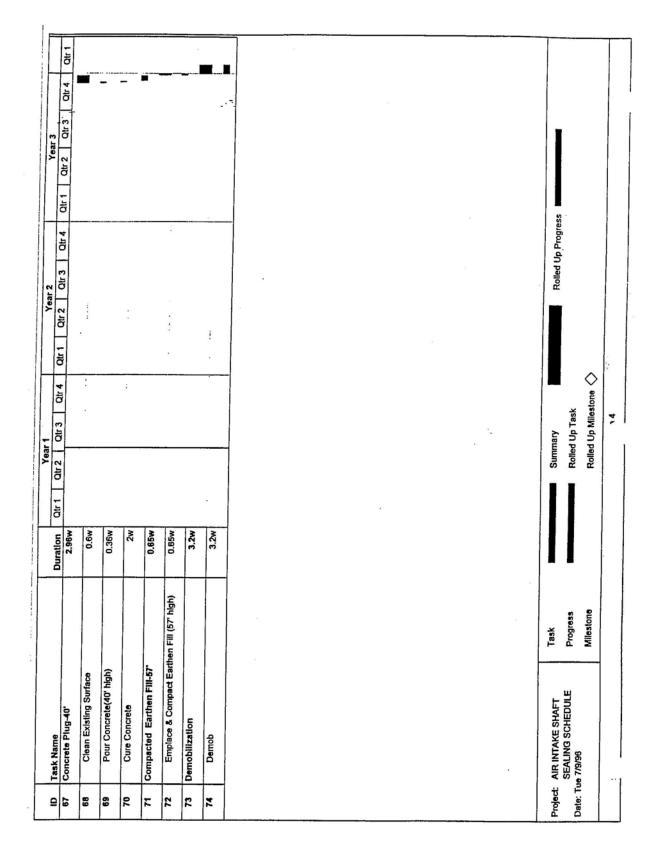
1 SEALING SCHEDULE - AIR INTAKE SHAFT



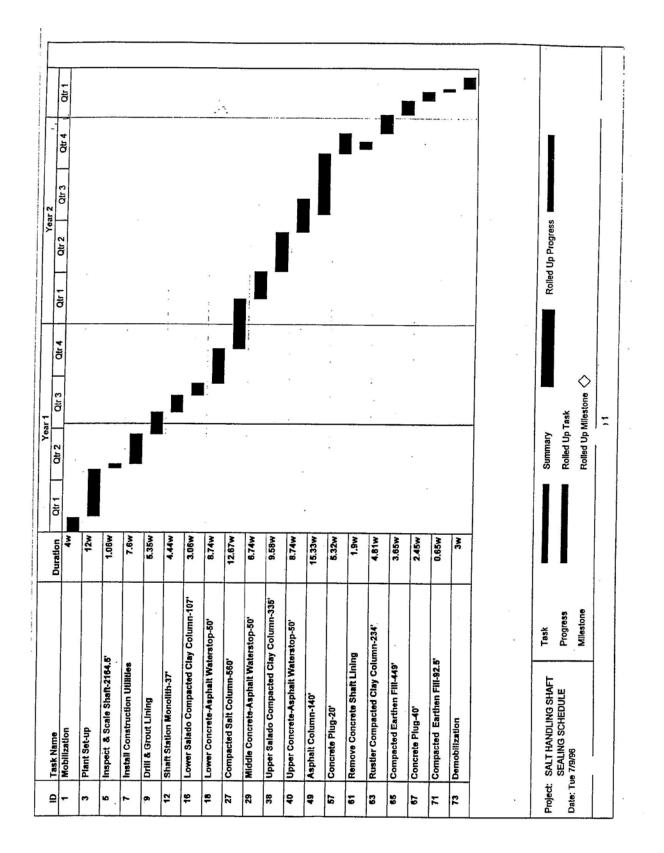
Interference Duration Ort A Ort A Ort A 1 Monitation 4/w 1 Monitation 4/w 3 Plant Set-up 12x 4 Plant Set-up 12x 5 Inspect & Scale Shaft 1/w 7 Inspect & Scale Shaft 1/w 7 Instell Unities 7.17w 9 Print & Grout Lining 11.5w 11 Scrout Lining 11.5w 12 Construct Bulkheads 0.6w 13 Pour Concrete (37 high) 0.96w 14 Streat Station Monoith-3T 4.76w 15 Lower Salado Compacted City Column-93.5r 4.86w 16 Emplace Bentonite Block (33.5 high) 0.96w 17 Lower Concrete Asphalt Waterstop-50' 8.26w 18 Four Concrete Lower Plag (23 high) bp) 0.28w 19 Pour Concrete Lower Plag (23 high) bp) 0.72w 20 Excavele for Lower Plag (27 high) bp) 0.72w 21 Pour Concrete Lower Plag (23 high) bp) 0.72w 22 Cooldown Asphalt 1/w	
4w 4w 4w 4w 12w 11w 11w 11w 11.5w	
4w 12w ft-2161' 12w ft-2161' 1w Utilities 7.17w Thigh) 0.8w ads 0.8w ads 0.8w att of clay Column-93.6' 4.96w halt Waterstop-50' 8.26w halt Waterstop-50' 8.26w high typ.) 0.28w high typ.) 0.72w high typ.) 0.72w	
12w 11w 11w 11.5w <	
12w ft.2161 1w ft.2161 1w Shaft 1w Utilities 7.17w Utilities 7.17w 11.5w 11.5w 11.5w 11.5w </td <td></td>	
ft.2161 1w htt.2161 1w bint 1w Utilities 7.17w Utilities 7.17w 0 11.5w 11.5w 11.5w 0 11.5w 11.5w 0.98w 11.5w 0.98w 11.5w 0.98w 11.5w 0.98w 11.5w 0.98w 11.5w 0.98w halt Waterstop-50' 8.26w wer Plug (23' high typ.) 0.28w high typ.) 0.72w high typ.) 0.72w high typ.) 0.72w	
Shaft 1w Shaft 1.17w Utilities 7.17w 11.5w 11.5w ads 0.98w ads 0.98w ads 0.98w acted Clay Column-93.5r 4.96w halt Waterstop-50' 8.26w halt Waterstop-50' 8.26w high typ.) 0.28w high typ.) 0.72w high typ.) 0.72w	
Utilities 7.17w 0 7.17w 11.5w 11.5w 0 11.5w 11.5w 11.5w adds 0.9w 3w 3w acted Clay Column-93.5r 4.96w halt Waterstop-50' 8.26w halt Waterstop-50' 8.26w halt Waterstop-50' 0.28w high typ.) 0.72w high typ.) 0.72w high typ.) 0.72w	
7.17w 7.17w 10 11.5w 11.5w 11.5w 11.5w 11.5w ads 0.8w 7 high) 0.98w 7 high) 0.98w acted Clay Column-93.6* 4.96w halt Waterstop-50* 8.26w wer Plug (23* high) typ.) 0.28w top 0.53w high typ.) 0.72w high typ.) 0.72w	
11.5w 11.5w 11.5w th-37 4.76w ads 0.36w 7 high) 0.36w 7 high) 0.36w 7 high) 0.36w acted Clay Column-93.5' 4.96w acted Clay Column-93.5' 4.96w halt Waterstop-50' 8.26w halt Waterstop-50' 8.26w on 0.33w 1.67w wer Plug (23' high typ.) 0.28w top 0.72w high typ.) 0.72w aft 1w	
11.5w 11.5w 11.5w 11.5w ads 0.8w ads 0.8w acted Clay Column-93.6* 3w acted Clay Column-93.6* 1.67w wer Plug 1.67w wer Plug 1.67w high typ.) 0.72w high typ.) 0.72w high typ.) 1	
th-37 4.76w ads 0.8w 7 high) 0.98w acted Clay Column-93.5' 4.96w te Blocks (93.5' high) 4.96w halt Waterstop-50' 8.26w halt Waterstop-50' 8.26w the Plug (23' high typ.) 0.28w wer Plug (23' high typ.) 0.28w high typ.) 0.72w high typ.) 0.72w	
ads 0.8w 7 high) 0.98w acted Clay Column-93.6* 4.96w te Blocks (93.5* high) 4.96w halt Waterstop-50* 8.25w er Plug 1.67w wer Plug (23* high typ.) 0.28w high typ.) 0.63w high typ.) 0.63w	
7 high) 0.98w acted Clay Column-93.5' 3.w acted Clay Column-93.5' 4.96w tel Blocks (93.5' high) 4.96w halt Waterstop-50' 8.26w over Plug 1.67w ower Plug (23' high typ.) 0.26w high typ.) 0.72w high typ.) 0.72w	
acted Ctay Column-93.5' 4.96w te Blocks (93.5' high) 4.96w halt Waterstop-50' 8.26w er Plug 1.67w wer Plug (23' high typ.) 0.28w high typ.) 0.63w high typ.) 0.63w	
acted Clay Column-93.5' 4.96w te Blocks (93.5' high) 4.96w halt Waterstop-50' 8.26w er Plug (23' high typ.) 0.26w wer Plug (23' high typ.) 0.56w high typ.) 0.72w high typ.) 0.72w	· · · · · · · · · · · · · · · · · · ·
te Blocks (93.5' high) 4.95w halt Waterstop-50' 8.25w er Plug (23' high typ.) 0.28w high typ.) 0.63w high typ.) 0.72w alt 1w	
halt Waterstop-50' 8.25w er Plug (23' high typ.) 0.28w wer Plug (23' high typ.) 0.38w high typ.) 0.72w high typ.) 0.72w alt 1w	
er Plug 1.67w 1.67w wer Plug (23' high typ.) 0.28w 0.63w high typ.) 0.52w 1.72w 1.72	
wer Plug (23' high typ.) 0.28w top 0.63w high typ.) 0.72w alt 1w Task	:
top 0.63w high typ.) 0.72w alt 1w Task	
high typ.) 0.72w ait 1w Task	
alt 1w Task	
Task	••• ••
	Raliad In Docume
Milestone	
Page 1	

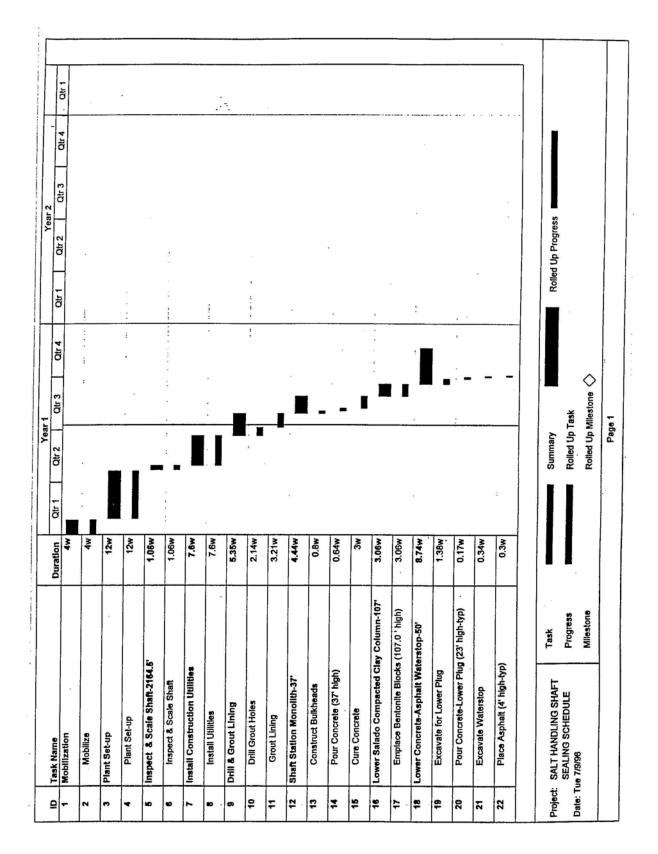


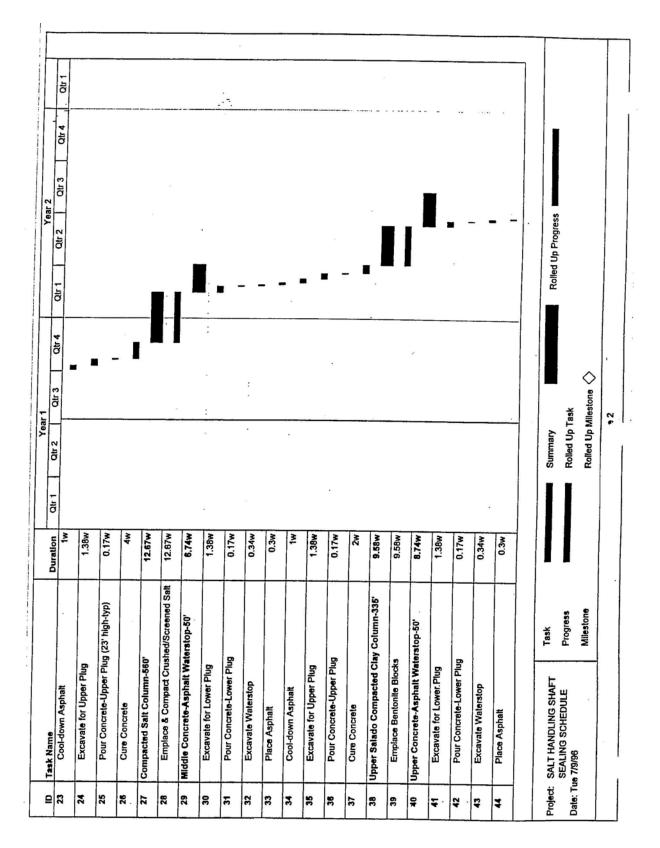


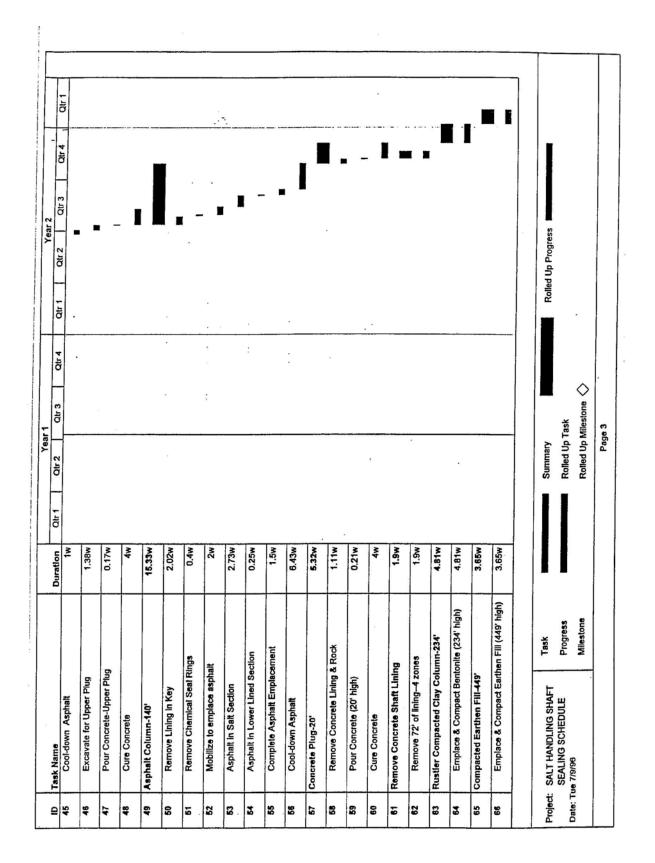


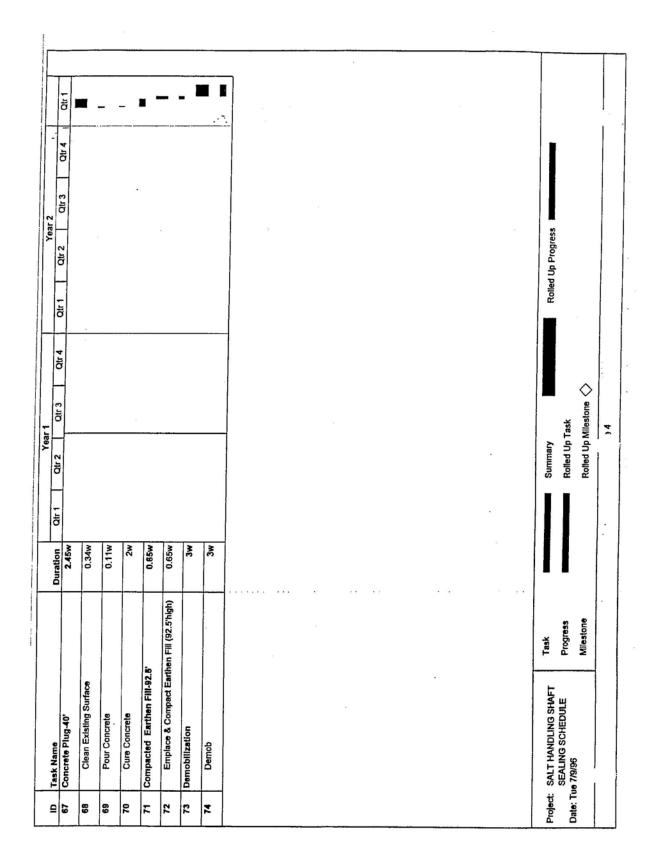
SEALING SCHEDULE - SALT HANDLING SHAFT



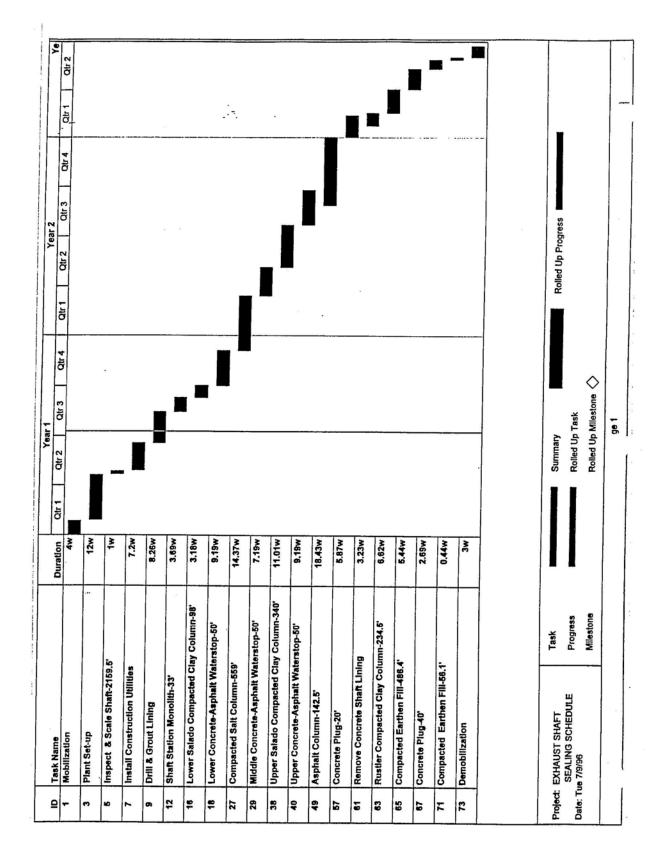


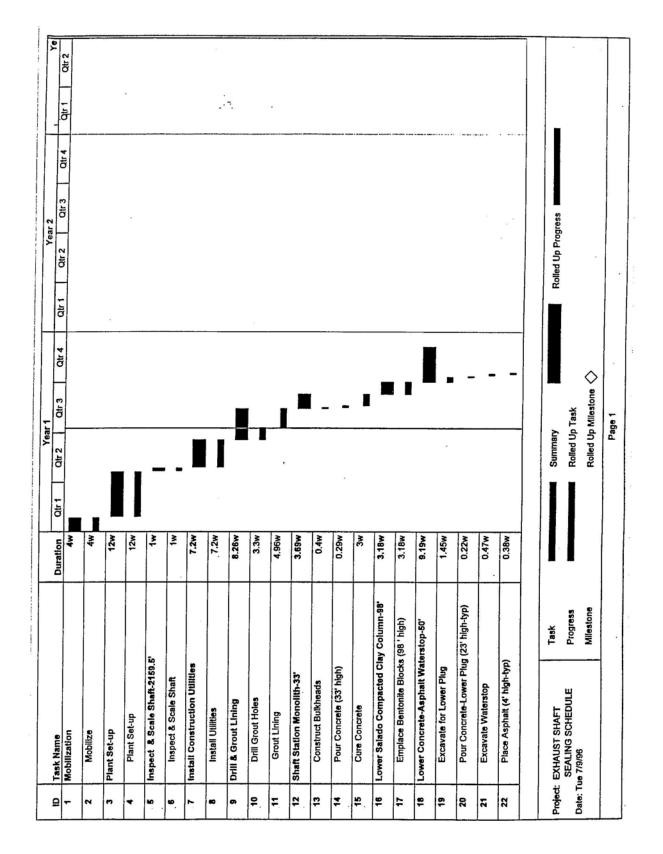


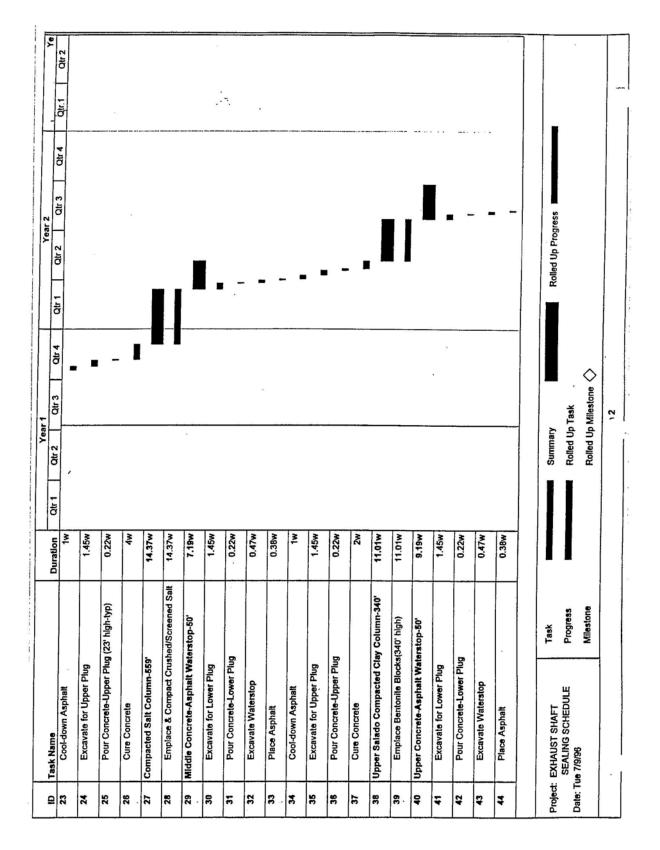


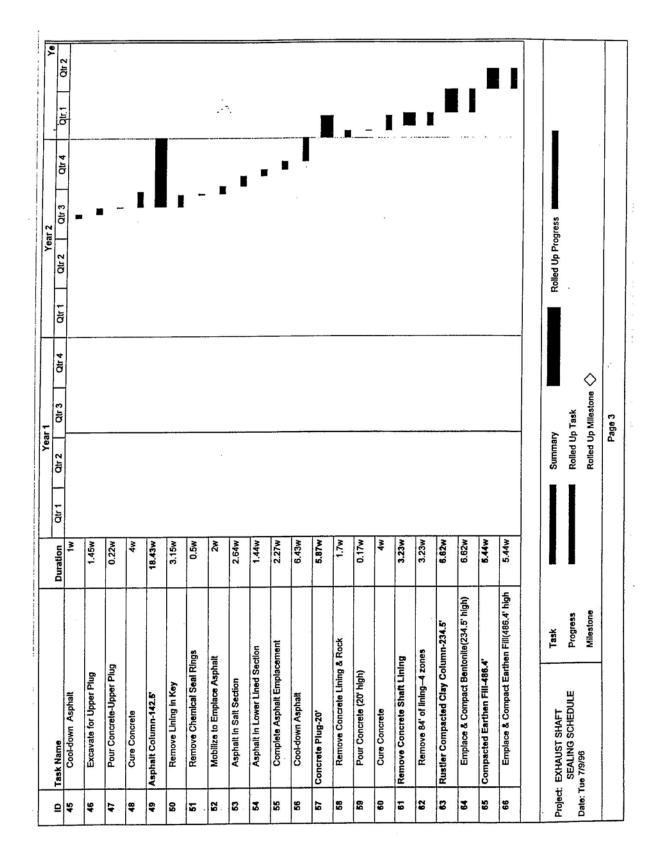


SEALING SCHEDULE - EXHAUST SHAFT



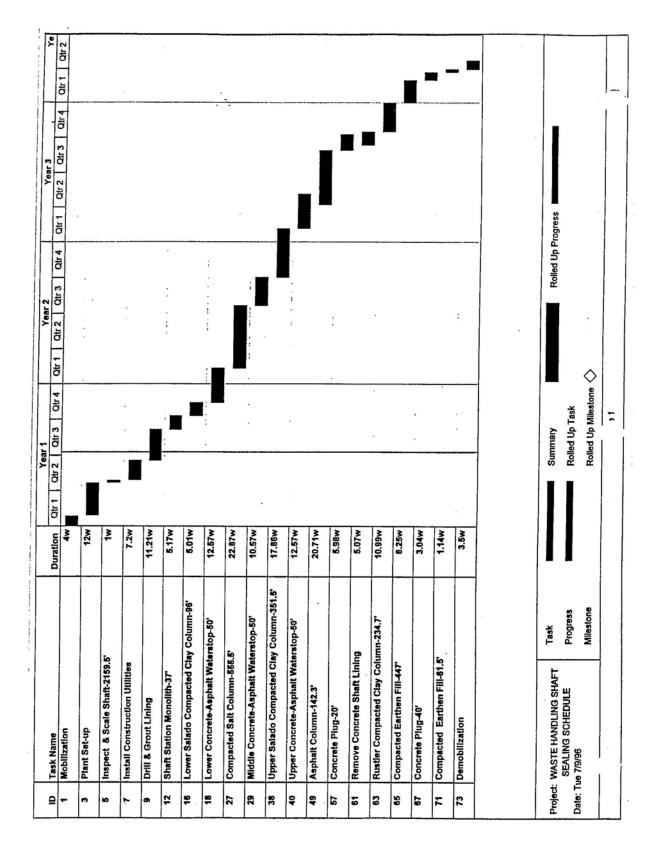


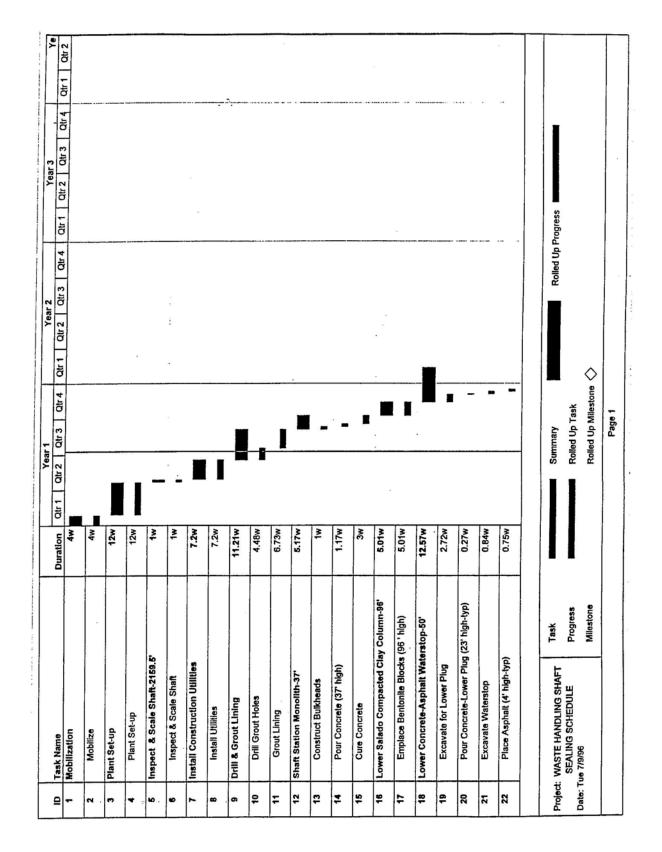


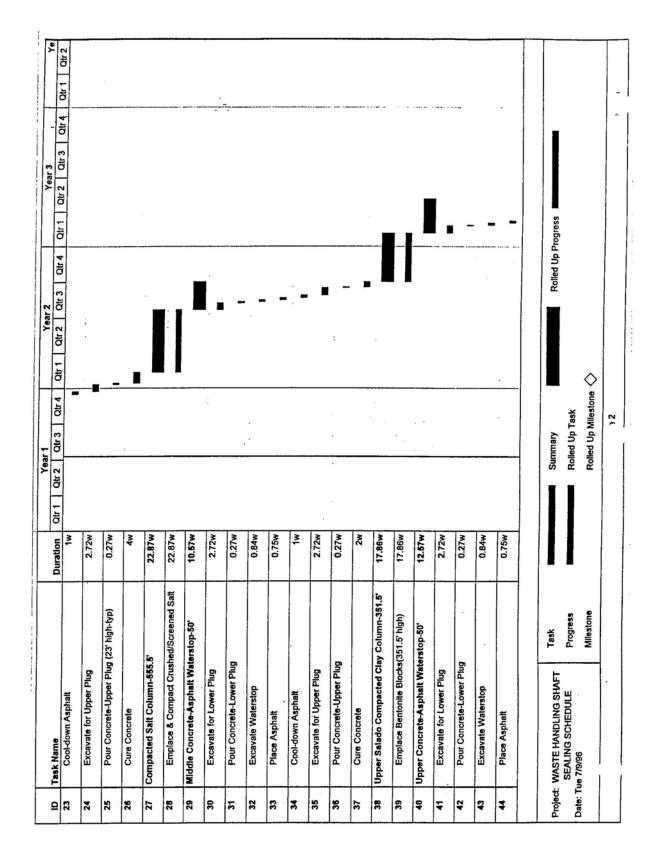


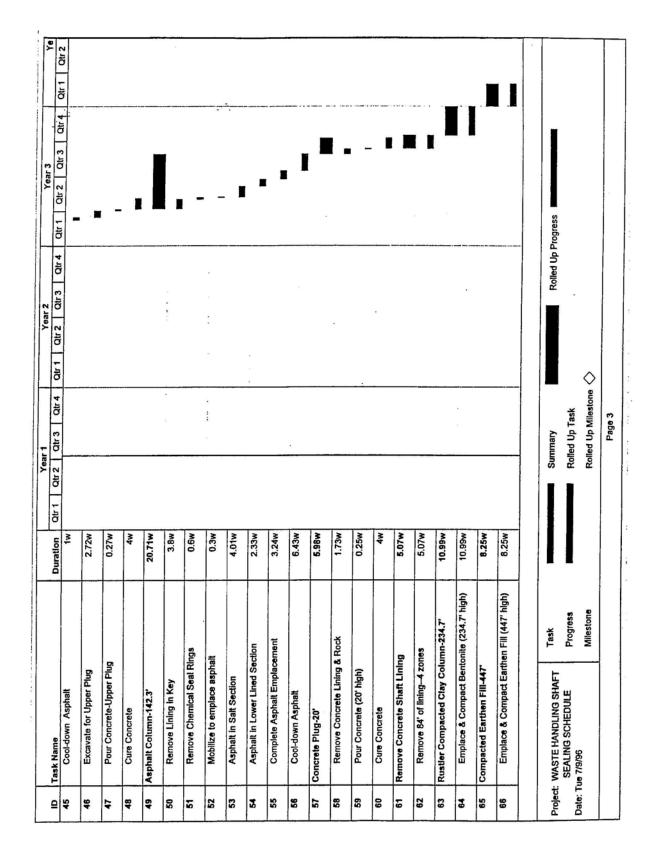
0 Control Films Darfield Or A	Duration Qtr 1 269 0.47w 269 0.47w 200 0.22w 1-56.1 0.22w 1-56.1 0.44w 3w 3w 3w 3w Task Task	atr 3 atr 4 atr 1 atr 2 atr 3 atr 4 atr 1
260 2104 00 0.47W 166 0.22W 166 0.24W 167 0.24W 168 0.44W 270 0.44W 281 0.44W 281 0.44W 281 0.44W 281 0.44W 281 0.44W 281 0.44W 164 17 164 10 174 10 175 10	2.89w 000 0.47w 0.22w 0.22w 11-56.11 0.44w 3w 3w 3w 3w 1ask 1ask	
Col Cut/w 166.1* 0.47w 166.1* 0.22w 166.1* 0.44w 3w 3w 3w 3w 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Ce 0.47w 0.22w 0.22w 1-56.1* 0.44w 3w 3w 1ask Task	
Tak Item Similar Tak Item Similar Tak Summay Progress Rolled Up Track	0.22w 2w 1-56.1* 0.44w 3w 3w Task Task	
Tak Tak Tak Tak Tak Collect Up Tak Progress Rolect Up Tak Rolect Up Tak Rolect Up Tak	I-56.1* 2w I-56.1* 0.44w 3w 3w Task Task	
Ite6.1* Control 0.44w Eminential (66, fing)) Cutw Sw	Il-56.1* 0.44w A Earthen Fill (56.1*high) 0.44w 3w 3w Task Task	
Territor C44w 3w 3w 3w 3w 1 3w 1 1 <	Task 1	
aw 3w 3w 3w 3w 1 <td>Task</td> <td></td>	Task	
Image: Summary Frogress Summary Frogress Frogress Rolled Up Frogress	Task Task	
Task Summary Rolled Up Progress Milestone Autor brogress Rolled Up Milestone Autor Rolled Up Mil	Task	-
Task Summary Progress Rolled Up Task Milestone Rolled Up Milestone	Task	
Progress Rolled Up Task Milestone Control of		
	Progress Milestone	one 🔷

SEALING SCHEDULE - WASTE SHAFT









68 68 68 68 68 68 68 68 68 68 68 68 68 6	Task Name Concrete Plug-40 Clean Existing Surface Pour Concrete					Year 2			Vor 3			
	Concrete Plug-40' Clean Existing Surface Pour Concrete	Duration	n Qtr 1 Qtr 2	2 Otr 3 Otr 4	4 Otr 1	Otr 2	Otr 3 Otr 4	0110	Ciro Ciro	-	ŀ	2
	Clean Existing Surface Pour Concrete	3.0	×				-	-	20 2 011 3	410	- I	Qtr 2
	Pour Concrete	0.64w	M									
		0.4w	M		in e stade						-	
	Cure Concrete		2w								-	
	Compacted Earthen Fill-61.5	1.14w	3									
1	Emplace & Compact Earthen Fill (61.5' high)	-III (61.5' high) 1.14w	3									
	Demobilization	3.5w	3								-	
2	Demob	3.5w		1	2							_
									· ·			
oject: V		Task		Summary			Rolled Up Progress	rogress				
te: Tue	SEALING SCHEDULE P Date: Tue 7/9/96 N	Progress Milestone		Rolled Up Task Rolled Un Milestone 🔿								
	_			V							ļ	

1 B5. References

2 Ahrens, E.H., and F.D. Hansen. 1995. *Large-Scale Dynamic Compaction Demonstration Using*

3 WIPP Salt: Fielding and Preliminary Results. SAND95-1941. Albuquerque, NM: Sandia National

- 4 Laboratories. (Copy on file in the Sandia WIPP Central Files, Sandia National Laboratories,
- 5 Albuquerque, NM [SWCF] as WPO31104.)
- 6 Ahrens, E.H., and M. Onofrei. 1996. "Ultrafine Cement Grout for Sealing Underground Nuclear
- 7 Waste Repositories," 2nd North American Rock Mechanics Symposium (NARMS 96), Montreal,
- 8 *Quebec, June 19-21, 1996.* SAND96-0195C. Albuquerque, NM: Sandia National Laboratories.
- 9 (Copy on file in the SWCF as WPO31251.)
- Ahrens, E.H., T.F. Dale, and R.S. Van Pelt. 1996. *Data Report on the Waste Isolation Pilot Plant*
- 11 Small-Scale Seal Performance Test, Series F Grouting Experiment. SAND93-1000.
- Albuquerque, NM: Sandia National Laboratories. (Copy on file in the SWCF as WPO37355.)
- Boonsinsuk, P., B.C. Pulles, B.H. Kjartanson, and D.A. Dixon. 1991. "Prediction of Compactive
- 14 Effort for a Bentonite-Sand Mixture," 44th Canadian Geotechnical Conference, Preprint Volume,
- 15 Calgary, Alberta, September 29-October 2, 1991. Paper No. 64. Waterloo, Ontario: Canadian
- Geotechnical Society. Pt. 2, 64/1 through 64/12. (Copy on file in the SWCF.)
- 17 Dale, T., and L.D. Hurtado. 1996. "WIPP Air-Intake Shaft Disturbed-Rock Zone Study," 4th
- 18 International Conference on the Mechanical Behavior of Salt, Montreal, Quebec, June 17-18,
- 19 1996. SAND96-1327C. Albuquerque, NM: Sandia National Laboratories. (Copy on file in the
- 20 SWCF.)
- Hansen, F.D., and E.H. Ahrens. 1996. "Large-Scale Dynamic Compaction of Natural Salt," 4th
- International Conference on the Mechanical Behavior of Salt, Montreal, Quebec, June 17-18,
- 1996. SAND96-0792C. Albuquerque, NM: Sandia National Laboratories. (Copy on file in the
- 24 SWCF as WPO39544.)
- 25 Knowles, M.K., and C.L. Howard. 1996. "Field and Laboratory Testing of Seal Materials
- Proposed for the Waste Isolation Pilot Plant," *Proceedings of the Waste Management 1996*
- 27 Symposium, Tucson, AZ, February 25-29, 1996. SAND95-2082C. Albuquerque, NM: Sandia
- National Laboratories. (Copy on file in the SWCF as WPO30945.)
- McClintock, F.A., and A.S. Aragon. 1996. *Mechanical Behavior of Materials*. Reading MA:
 Addison-Wesley.
- 31 Sandia (Repository Isolation Systems Department 6121). 1996. Waste Isolation Pilot Plant Shaft
- 32 Sealing System Compliance Submittal Design Report. SAND96-1326/1&2. Albuquerque, NM:
- 33 Sandia National Laboratories.
- Van Sambeek, L.L. 1988. Considerations for the Use of Quarried Salt Blocks in Seal
- *Components at the WIPP*. Topical Report RSI-0340. Rapid City, SD: RE/SPEC Inc. (Copy on
 file in the SWCF as WPO9233.)
- 37

FIGURES

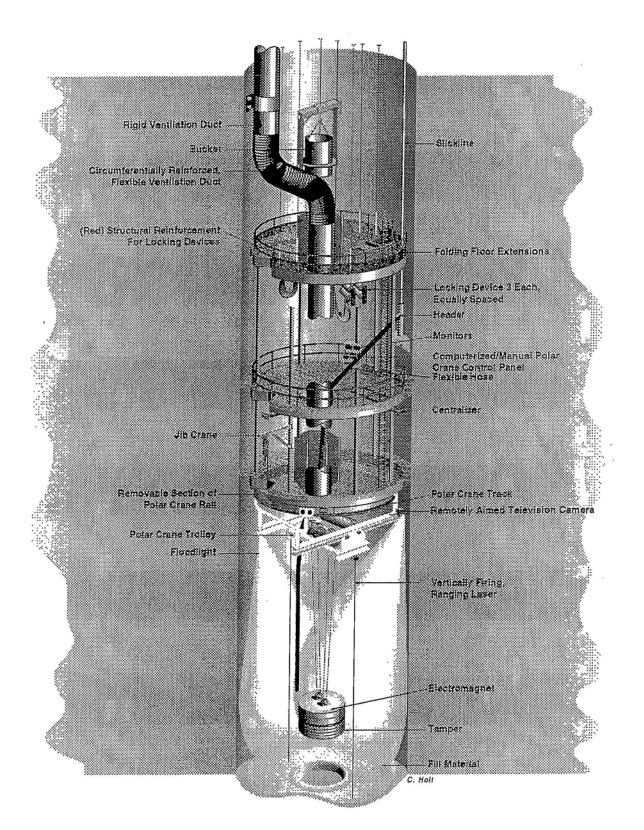


Figure G2B-1 Multi-Deck Stage Illustrating Dynamic Compaction

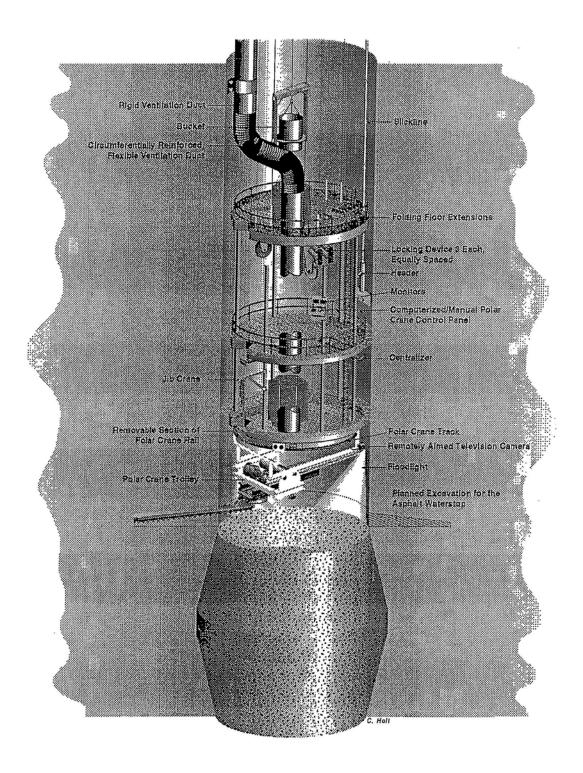
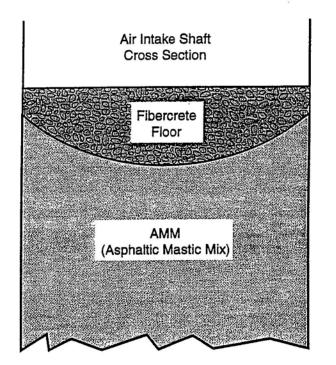
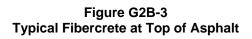


Figure G2B-2 Multi-Deck Stage Illustrating Excavation for Asphalt Waterstop



TRI-6121-375-0



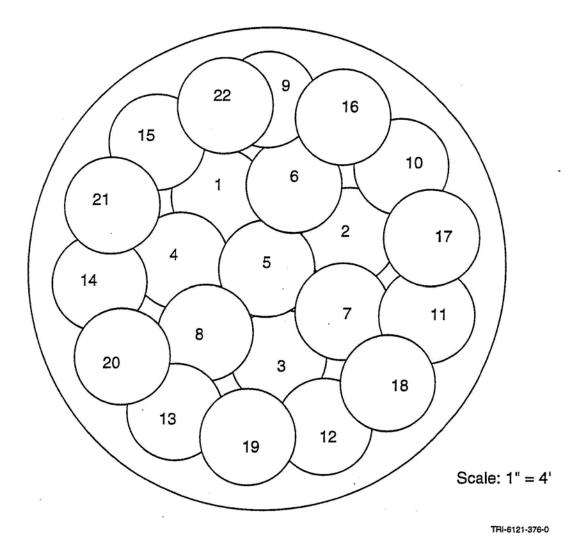
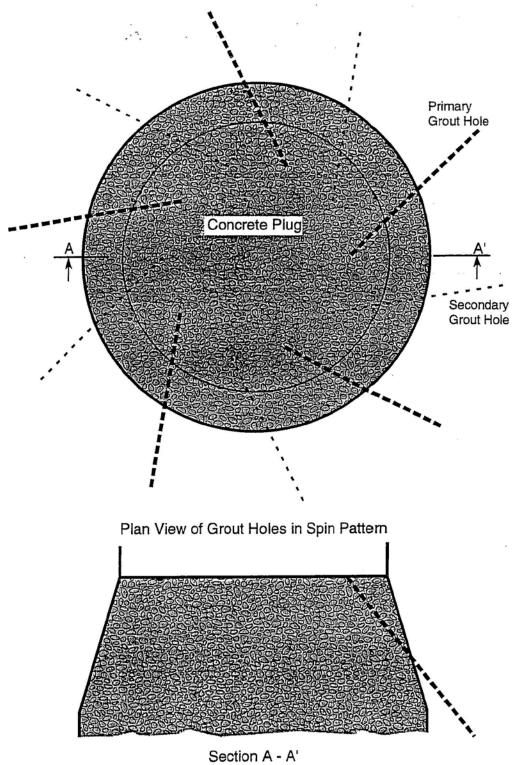
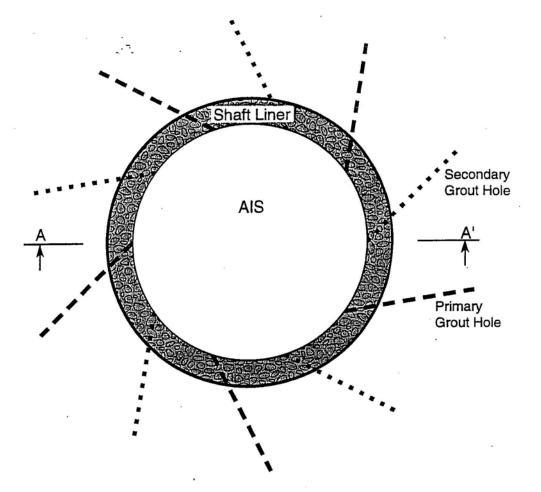


Figure G2B-4 Drop Pattern for 6-m-Diameter Shaft Using a 1.2-m-Diameter Tamper



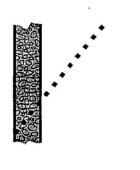
TRI-6121-373-0

Figure G2B-5 Plan and Section Views of Downward Spin Pattern of Grout Holes



Plan View of Grout Holes in Spin Pattern





Section A - A'

TRI-6121-374-0

Figure G2B-6 Plan and Section Views of Upward Spin Pattern of Grout Holes

ATTACHMENT G2 APPENDIX E

DESIGN DRAWINGS

SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT SAND96-1326/2 Unlimited Release Printed August 1996 Distribution Category UC-721

Waste Isolation Pilot Plant Shaft Sealing System Compliance Submittal Design Report

Volume 2 of 2: Appendix E

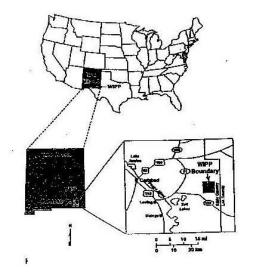
Repository Isolation Systems Department Sandia National Laboratories Albuquerque, NM 87185

ABSTRACT

£

1

This is the second volume of a two-volume report describing a shaft sealing system design for the Waste Isolation Pilot Plant. This appendix contains detailed drawings of the shaft sealing system and its components.



DRANTING NUMBER

\$N1-807

SHL-007

SHL-007 3 07 28

534L-007 4 OF 28

SNL-007

SHL-007 6 07 28

500-007 7 07 18

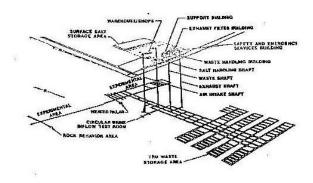
FHL-007 8 OF 28

SHL-007 9 OF 28

...

TITLE

WIPP LAYOUT



1

WASTE ISOLATION PILOT PLANT

CARLSBAD, NM

SHAFT SEALING SYSTEM DESIGN

DESIGN DRAWINGS

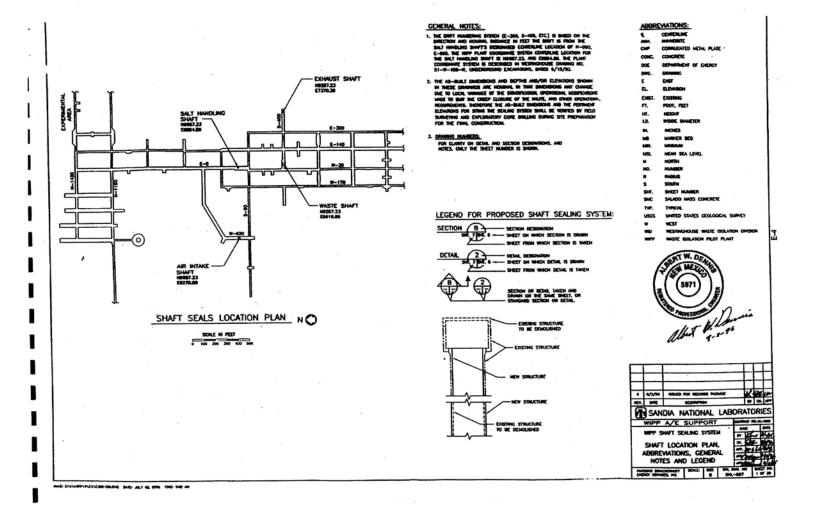
...

24	t TITLE	DRAWING NUMBER	R TITLE	DICTUTION NOW THE	1
	WIPP SHAFT SCALING SISTER	539,-007	WIPP SMAFT SEALING SYSTEM	53L-007 19 OF 28	K
	SEAFT LOCATION PLAN,	10 DF 28	SALADD FORMATION	19 09 20	- 2
	ABBREVIATIONS, CENERAL		AIR INTAKE SNAFT		1 in
	NOTES AND LEGEND		STRATICRAPHY & BEALING SURSYSTEM PROFILE		5
	WIPP SHAPT REALING STOTEM		NIPP SHAPT SEALING SYSTEM	SHL-007	
	WEAR-SURFACE/RESTLES FORMATIONS	SML-007	ATE INTAKE SHAFT	20 OF 28	1
	HASTE SHAFT ETRATIGRAPHY &	13 07 44	SHAFT STATION NONOLITH		3
	AS-BUILT KLINKETS				5
	WIPP SHAPP STALING STATES	SHL-007	WIPP CHAPT SCALING SYSTEM		
	SALADO POWMASTON	12 OF 28	WEAR-SURPACE / MISTLER FORMATIONS	SML-007	H
	WASTE MART		EXHAUST SEAFT	21 07 28	2
	STRATICRAPHY &		STRATICRAPHY &		4
•	AS-BUILT BLEMENTS		AS-SULLT ELEMENTS		
	WIPP SHAFT STALLING SYSTEM	540-047	WIPP SHAPP CEALING SYSTEM	SHL-007	
	HEAR-SURPACE/HUSTLER POPULATIONS	13 97 24	JALADO FORMATION	21 62 28	4
	WASTE SHAFT		EXHAUST SEAFT		
	STRATIGRAPHY & SEALING		STRATICRAPHY 4	SHL-007	
	SUASTETEN PROFILE		AS-BUILT ELEMENTS	23 OF 28	
	WIPP SHAFT SPALING SYSTEM	50L-067	WIPP BHAPT SEALING STSTEM		1
	SALADO FORMATION	14 OF 26-	MEAR-SHRPACE/BUSTLER FORMATIONS	SNL-007 24 DF 28	1
	HASTE SHAFT		EXHAUST SHAFT	24 07 28	
	STRATIGRAPHY & SEALING		STRATIGRAPHY & STALING		
	SURSYSTEM PROFILE		SURVEYSTEN PROFILE	SHL-007	
	WIPP SHAFT SEALING SYSTEM	\$3L-067	WIPP SHAPT SEALING SYNTEM	25 OF 28	19
	WASTE SHAFT	15 0# 28	SALADO PORSATION	Contraction and	
	SHAFT STATION HONOLITE		EXCAUST SHAFT	SHL-007	- 2
			STRATIGRAPHY & SEALING	36 OF 28	12
			SUBSISTER PROFILE	621-007	- 21
	WIPP SHAPT FELLING IISTEN HEAR-SUNFACE/RESTLEP FORMATIONS	\$92-007	WIPP SHAFT SEALING SYSTEM	17 OF 28	- 31
	AIR INTAKE SHAT	16 OF 28	EXHAUST SHAFT		
	STRATIGRAPHY &		SHAFT FTATION HONOLITH	SNL-057	20
	AS BOILT ELEMENTS			28 OF 28	1
	WIPT SHAFT SPALING STATEM	SNL-007	WIPP SHAPT STALING SYSTEM		1
	SALADO PORMATICE	17 OF 28	NEAR-SURPACE/MUSTLER FORMATIONS		
	AIR INTAKE SHAFT	140000 HOU	BALT MANDLING SHAFT		
	CTRATICRASH'S C		ETRATICALITY -		
	AS-BUILT MANNES		AS-MULT ELEMENTS		
	WYPP SHAFT STALLING SYSTEM	501-007	WIFF SHAFT BEALING SYSTEM		
	FEAR-SURFACE/ROSTLER PORMATIONS	16 OF 28	SALADO FORMATION		
	AIR INTAKE SHAFT		SALT MANDELING SHAFT		
	STRATIGRAPHY & BEALING SUBSTSTEM PROFILE		STRATICRAPHY 5		
	and to real they the		AS-BUILT ELEMENTS		

HEPP SHAPT SZILING SISTEM Near-Curfacz/Rustler Formations Salt Rumoling Salft Stratigramby & Spaling Subsigned Profile WIPP STAFT SCALING SISTEM SALADO PORORIION SALT MANDLING SMAFT STRATIGARWY & STALING SUBSISTEM PROPILS NIPP SHAFT STALING SYSTEM SALT HANDLING SHAFT SHAFT STATION HONOLITE NIPP SHAPT STALING SYSTEM CONCRETE-ASPHALT NATERSTOP 78 BALADO FERMATION NIPP SHAFT SEALING SYSTEM WIPP SHAFT SEALING SYSTEM UPPER AND LONGE SALADO COMPACTED CLAY COLUMNS WIFF SHAFT STALLING STATEM DOMPACTED SALT COLUMN WIPP BEAPT BEALING SYSTEM CONCRETE FLOG NIPP STATT ARALING STOTEN RUSTLER COMPACTED CLAY COLUMN SIPP SHAPT STALLES SYSTEM CORPACTED EARINES FILL AND CONCRETE FLUG

TITLE

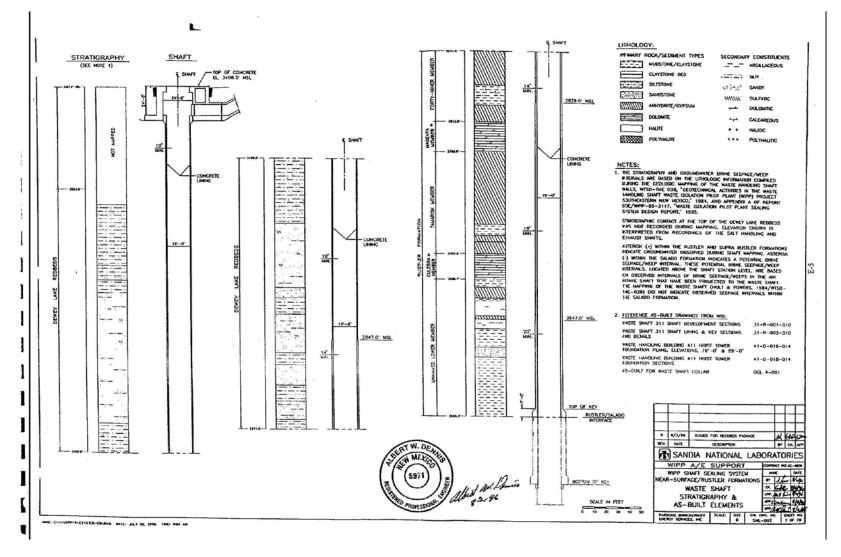
TRANTING MINIBER



Shaft Location Plan, Abbreviations, General Notes and Legend

1

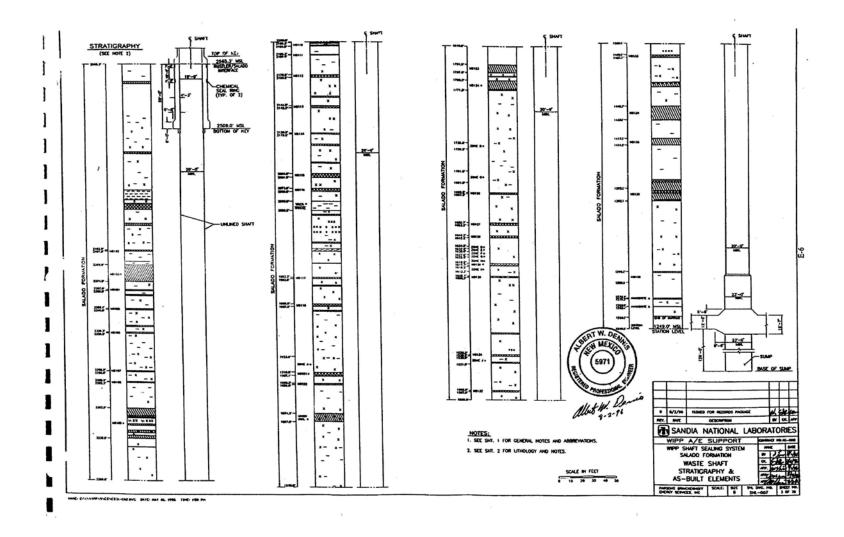
Sheet 1 of 28



Near-Surface/Rustler Formations Waste Shaft Stratigraphy and AS-Built Elements

1

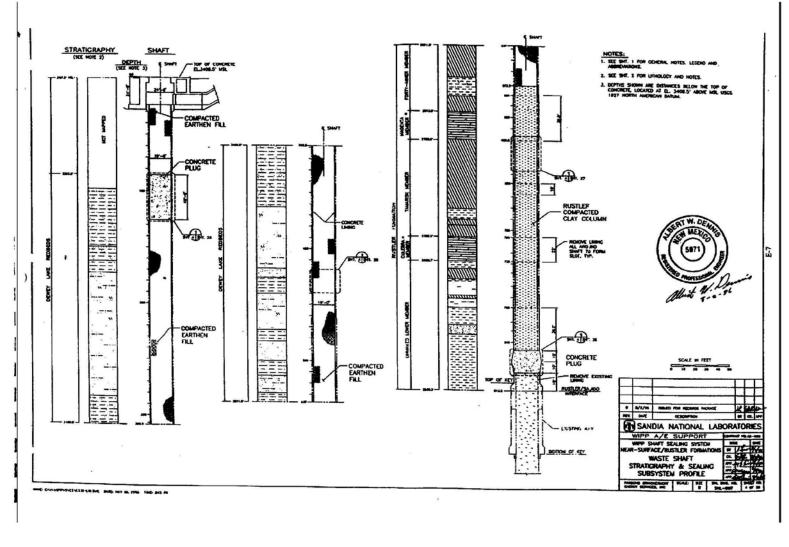
Sheet 2 of 28



Salado Formation Waste Shaft Stratigraphy and AS-Built Elements

1

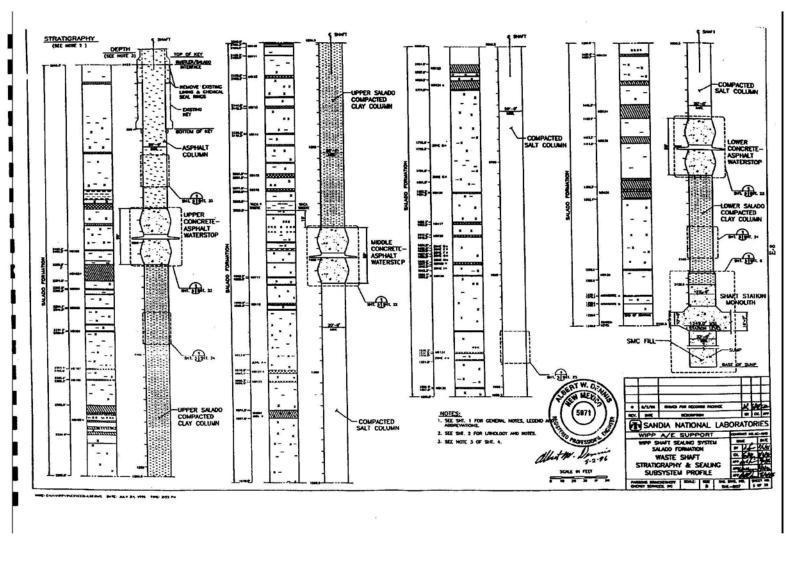
Sheet 3 of 28



Near-Surface/Rustler Formations Waste Shaft Stratigraphy and Sealing Subsystem Profile

1

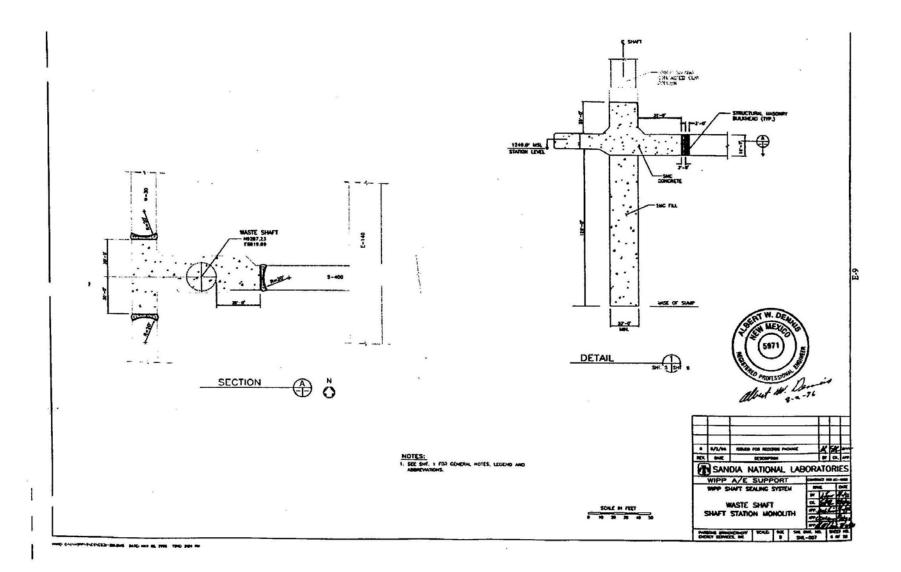
Sheet 4 of 28



Salado Formation Waste Shaft Stratigraphy and Sealing Subsystem Profile

1

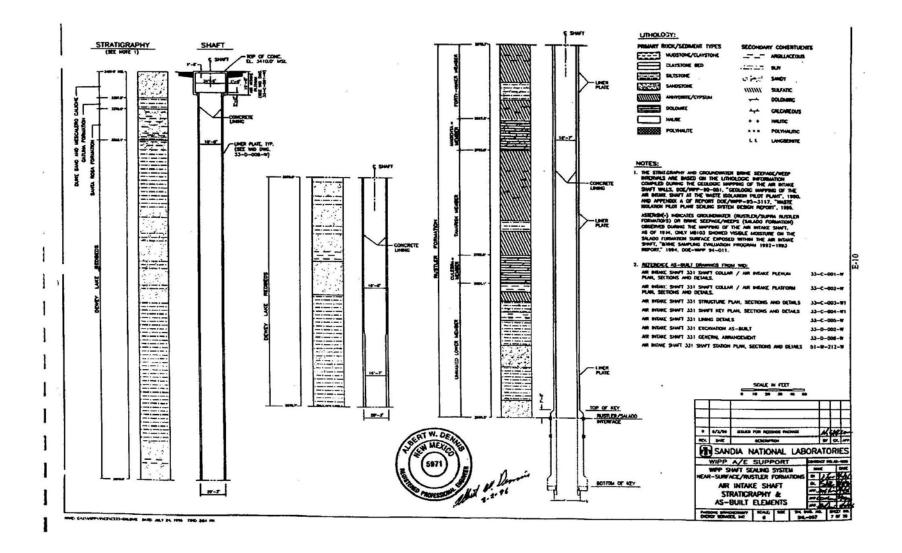
Sheet 5 of 28



Waste Shaft Station Monolith

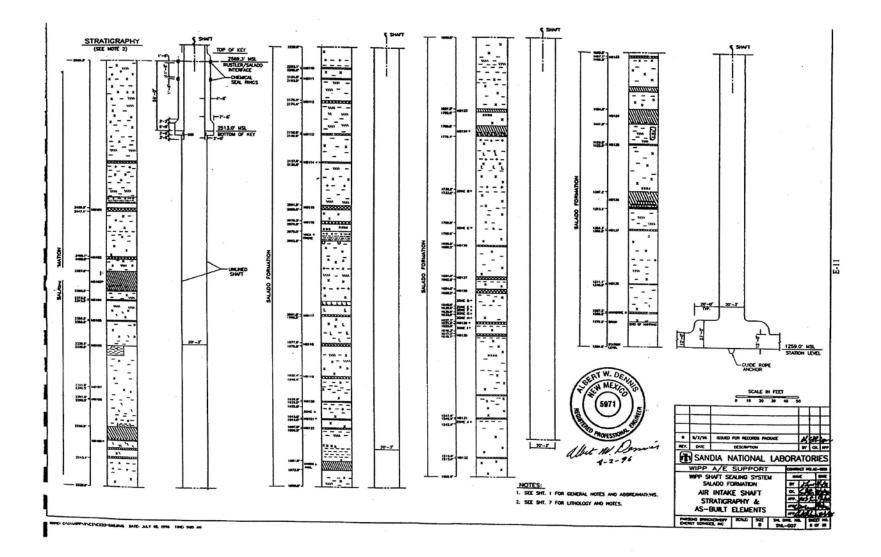
1

Sheet 6 of 28



Near-Surface / Rustler Formations Air Intake Shaft Stratigraphy and AS-Built Elements

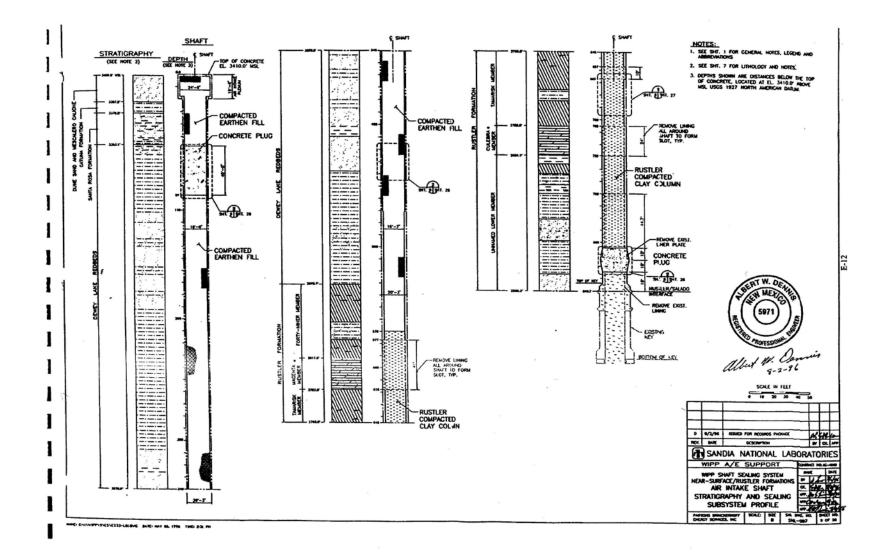
Sheet 7 of 28



Salado Formation Air Intake Shaft Stratigraphy and AS-Built Elements

1

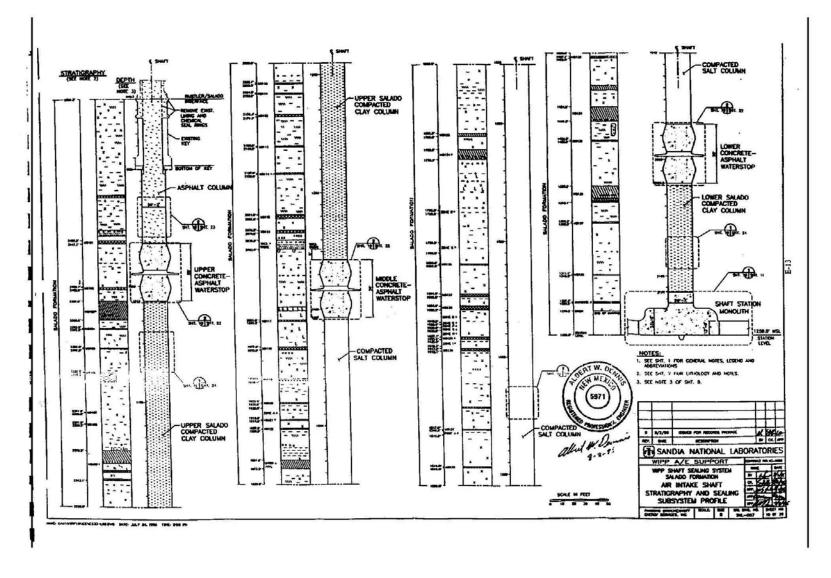
Sheet 8 of 28



Near-Surface / Rustler Formations Air Intake Shaft Stratigraphy and Sealing Subsytem Profile Sheet 9

1

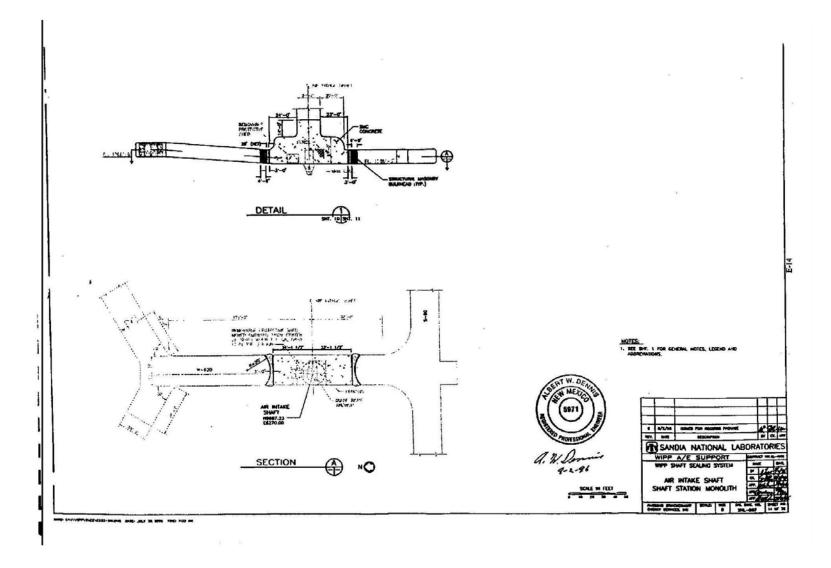
Sheet 9 of 28



Salado Formation Air Intake Shaft Stratigraphy and Sealing Subsytem Profile

1

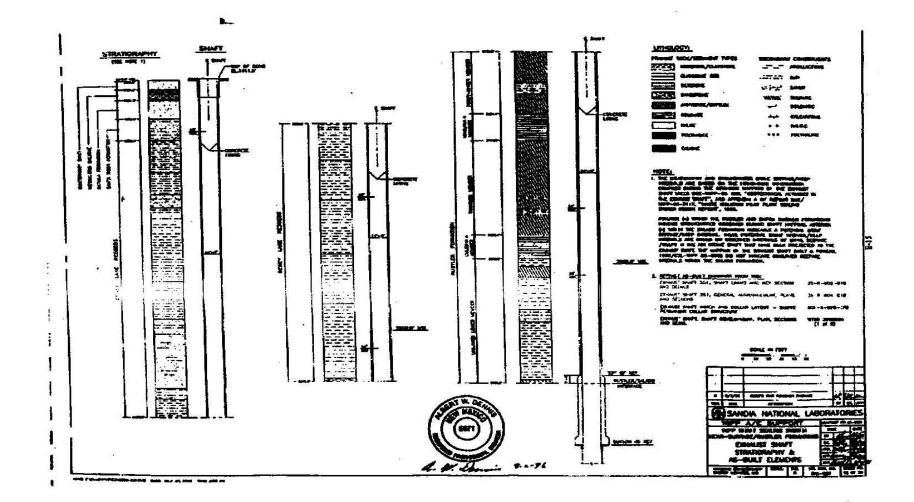
Sheet 10 of 28



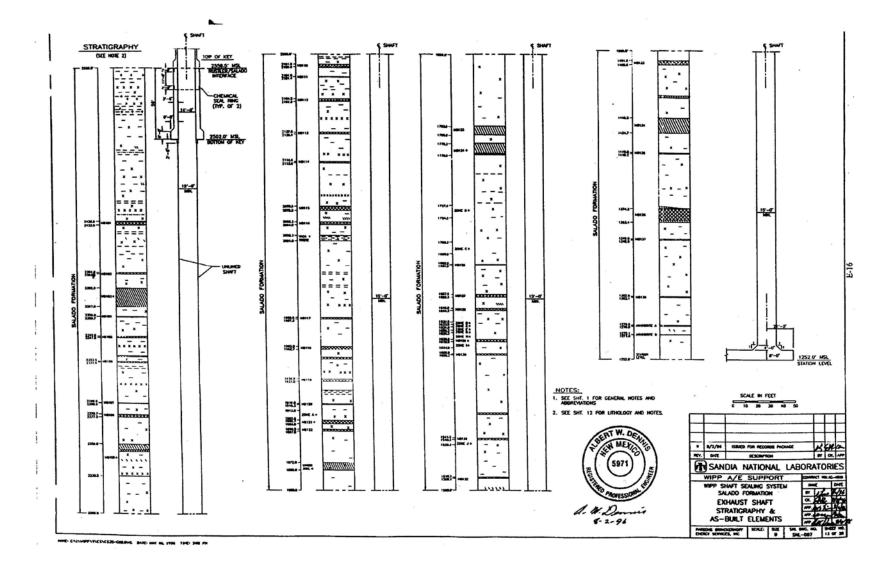
Air Intake Shaft Station Monolith

1

Sheet 11 of 28



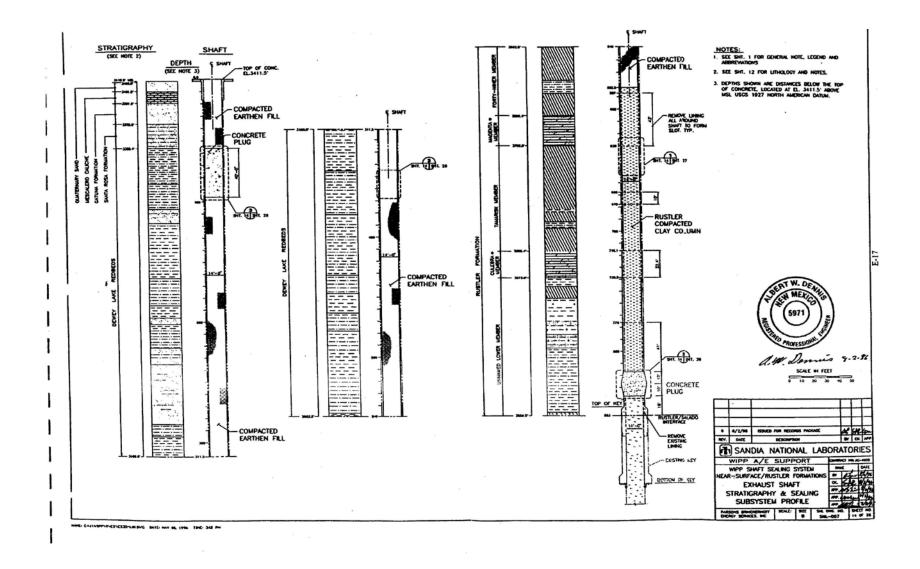
Near-Surface / Rustler Formations Exhaust Shaft Stratigraphy and AS-Built Elements Sheet 12 of 28



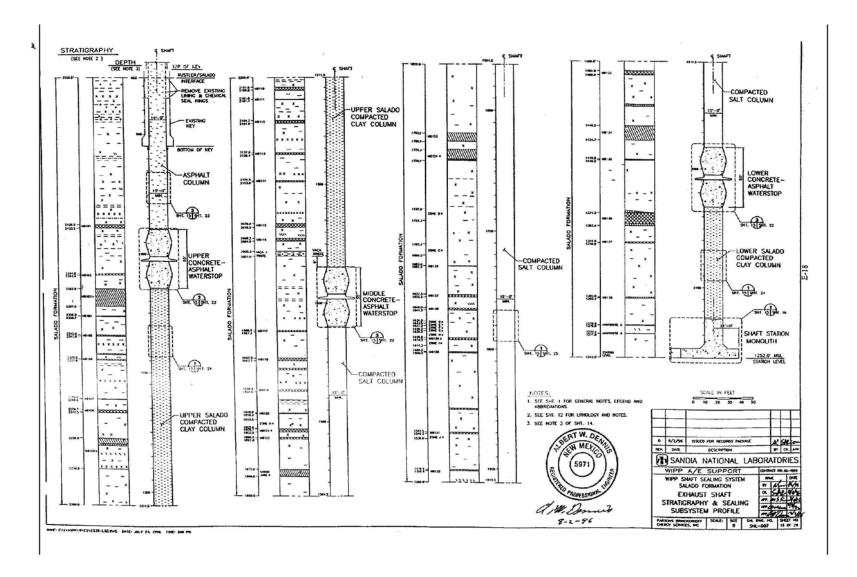
Salado Formation Exhaust Shaft Stratigraphy and AS-Built Elements

1

Sheet 13 of 28

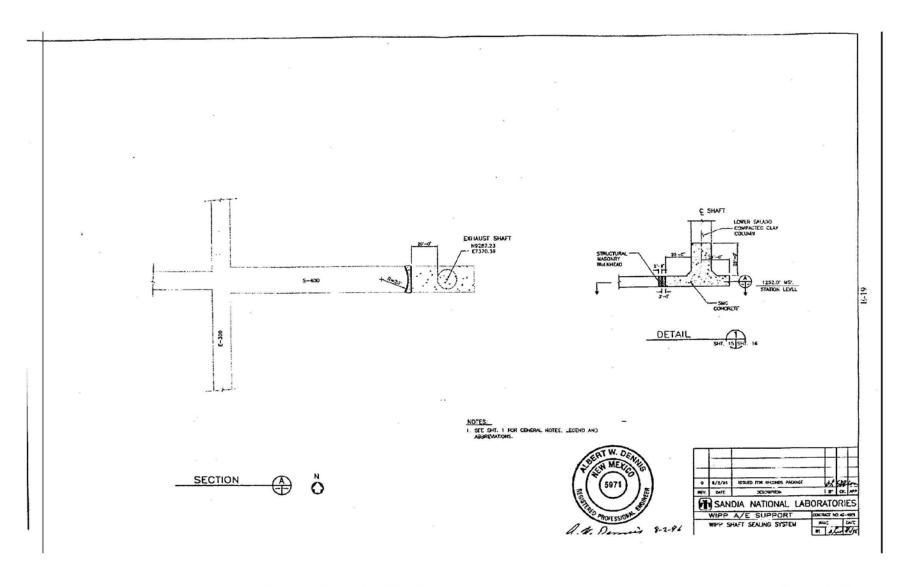


Near-Surface / Rustler Formations Exhaust Shaft Stratigraphy and Sealing Subsystem Profile Sheet 14 of 28



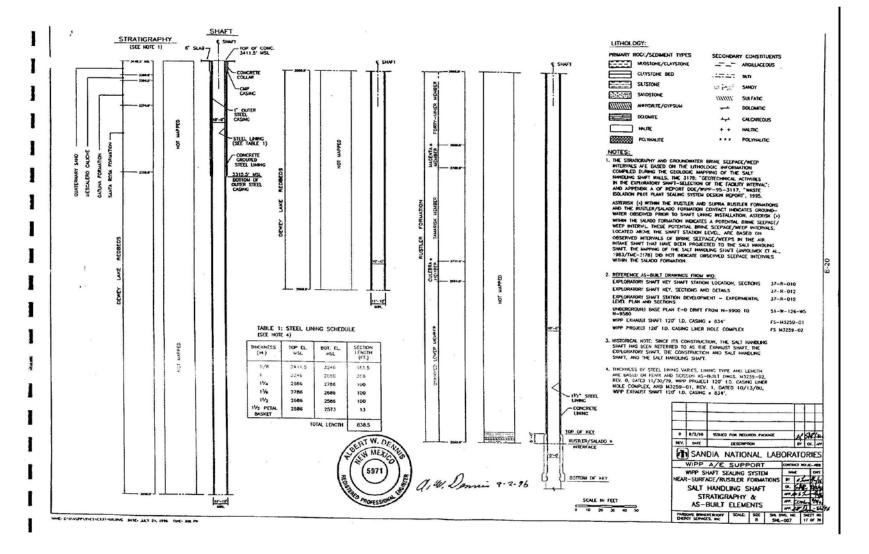
Salado Formation Exhaust Shaft Stratigraphy and Sealing Subsystem Profile

Sheet 15 of 28



Exhaust Shaft Station Monolith

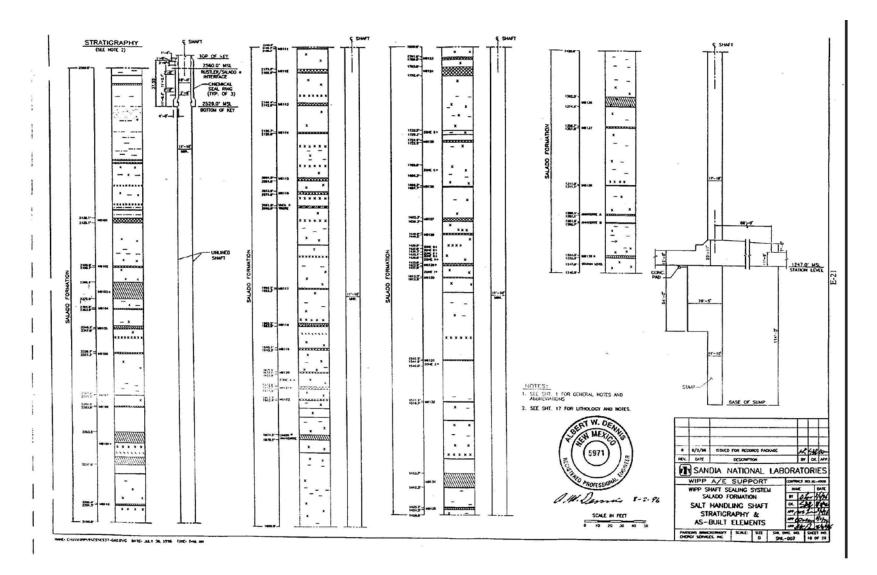




Near-Surface / Rustler Formations Salt Handling Shaft Stratigraphy and AS-Built Elements

1

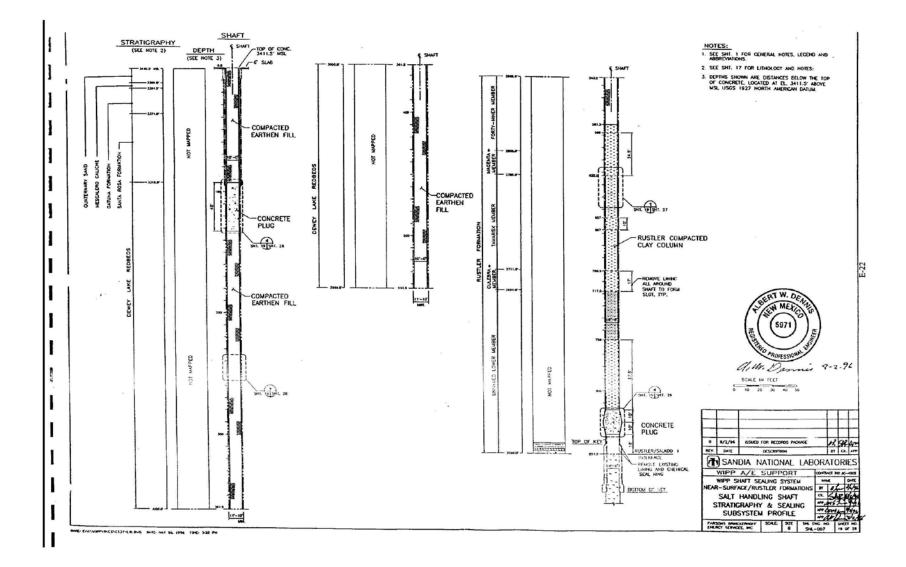
Sheet 17of 28



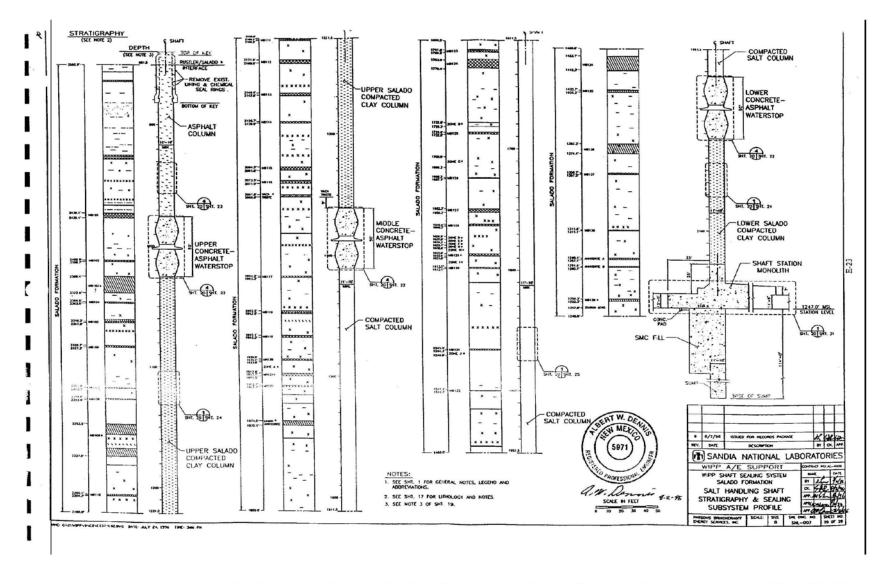
Salado Formation Salt Handling Shaft Stratigraphy and AS-Built Elements

1

Sheet 18 of 28



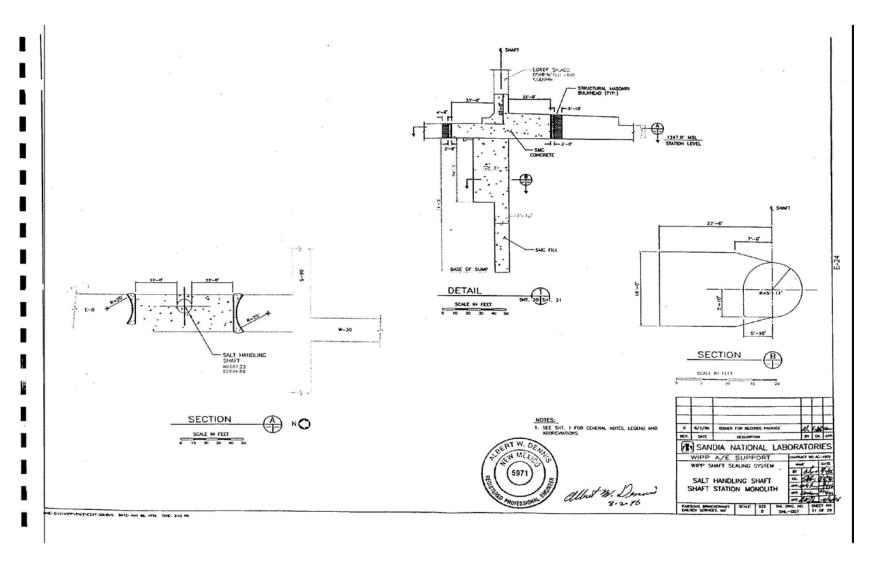
Near-Surface / Rustler Formations Salt Handling Shaft Stratigraphy and Sealing Subsystem Profile Sheet 19 of 28



Salado Formation Salt Handling Shaft Stratigraphy and Sealing Subsystem Profile

1

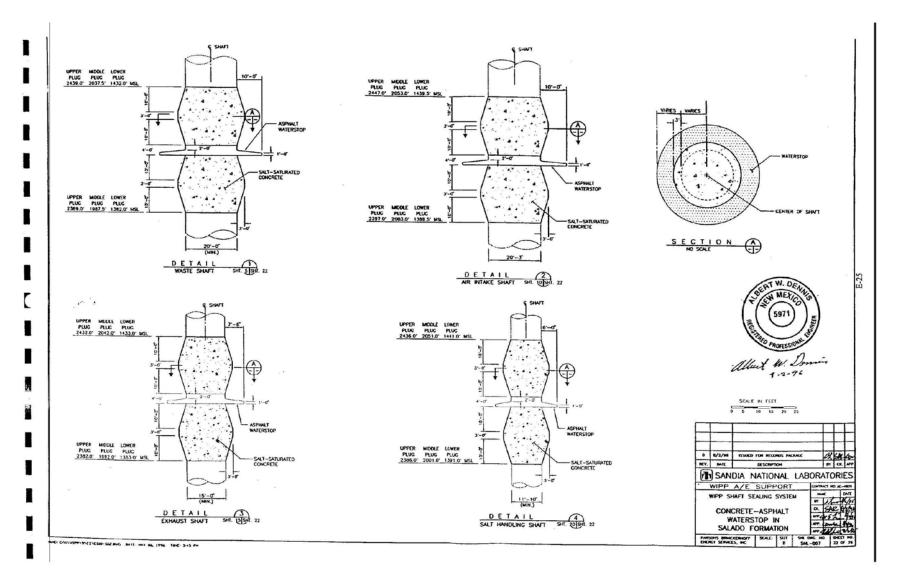
Sheet 20 of 28



Salt Handling Shaft Shaft Station Monolith

1

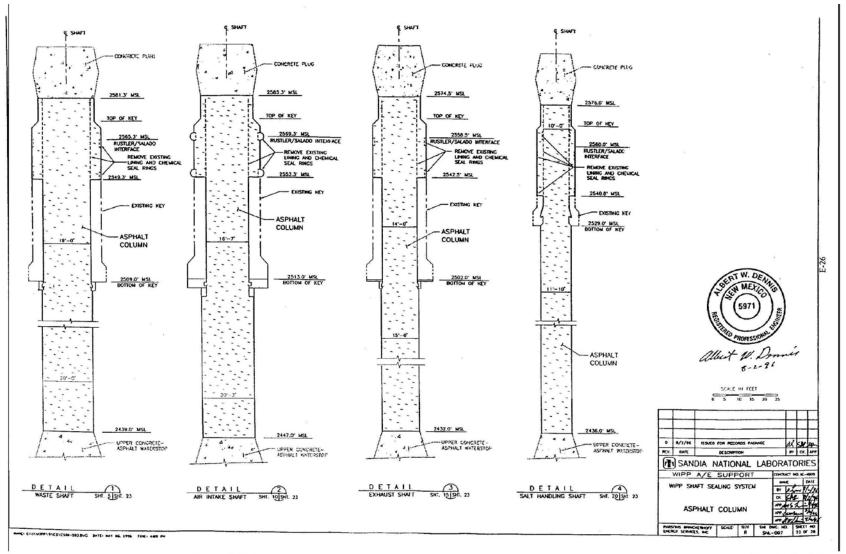
Sheet 21 of 28



Concrete-Asphalt Water Stop in Salado Formation

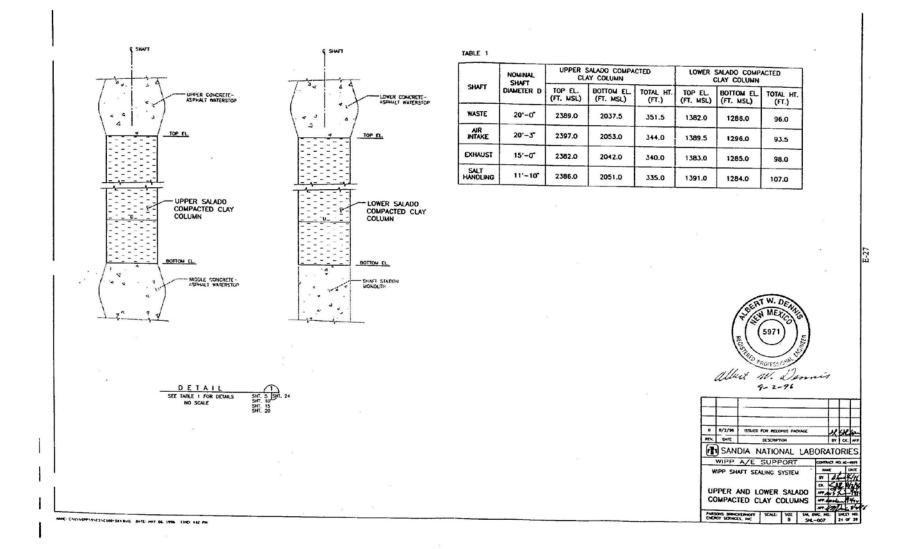
1

Sheet 22 of 28



Asphalt Column

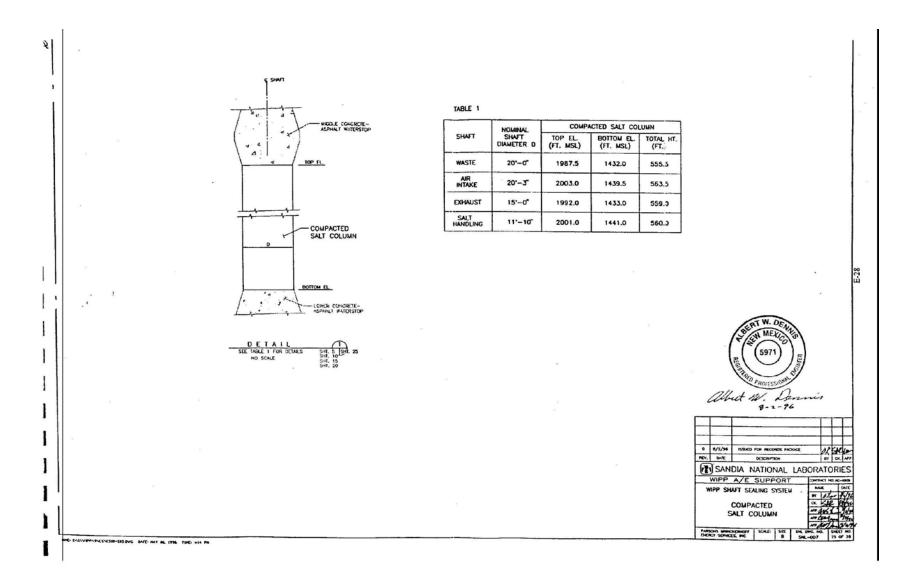




Upper and Lower Salado Compacted Clay Columns

1

Sheet 24 of 28



Compacted Salt Column

1

Sheet 25 of 28

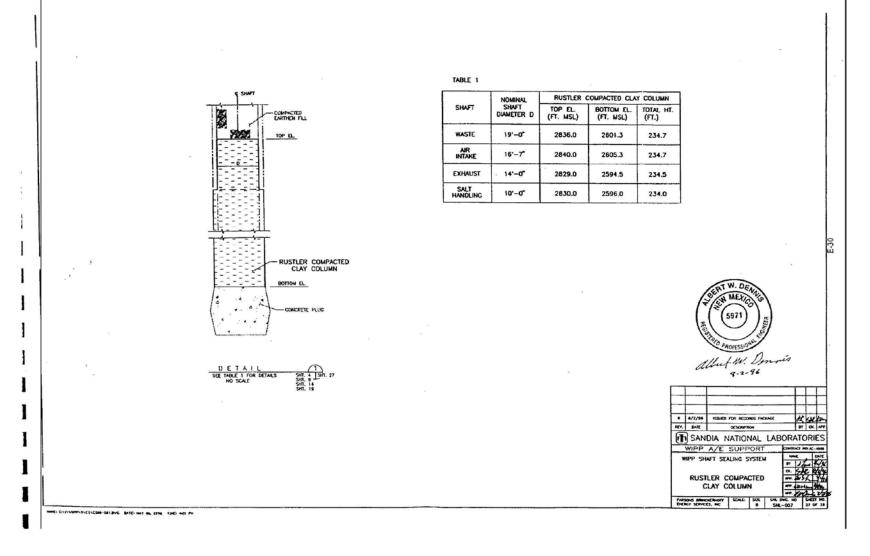
WIPP Shaft Sealing System Concrete Plug

1

Drawing SNL 007 26 of 28 not currently available. Drawing is not displayed in the Permit.

WIPP Shaft Sealing System Plug

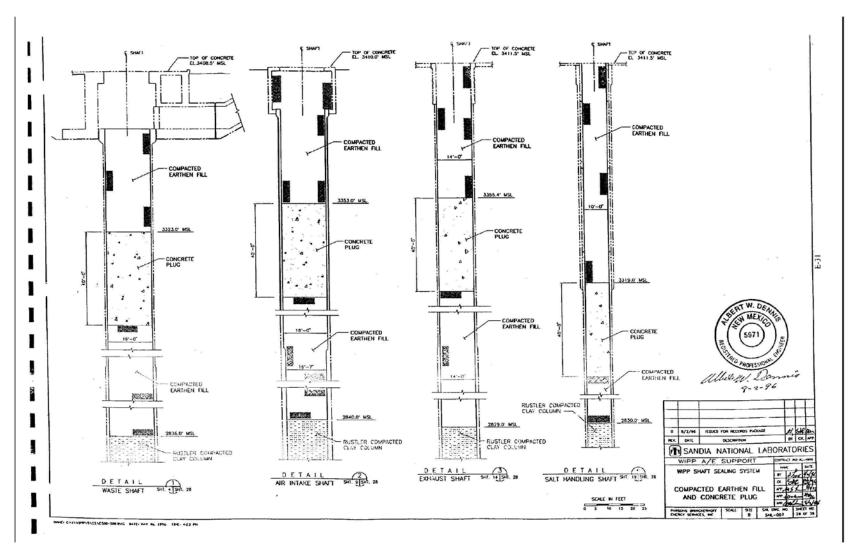
Sheet 26 of 28



Rustler Compacted Clay Cloumn

1

Sheet 27 of 28



Compacted Earthen Fill and Concrete Plug

1

Sheet 28 of 28

WASTE ISOLATION PILOT PLANT

CARLSBAD, NM

SHAFT SEALING SYSTEM DESIGN

EQUIPMENT AND CONSTRUCTION SKETCHES

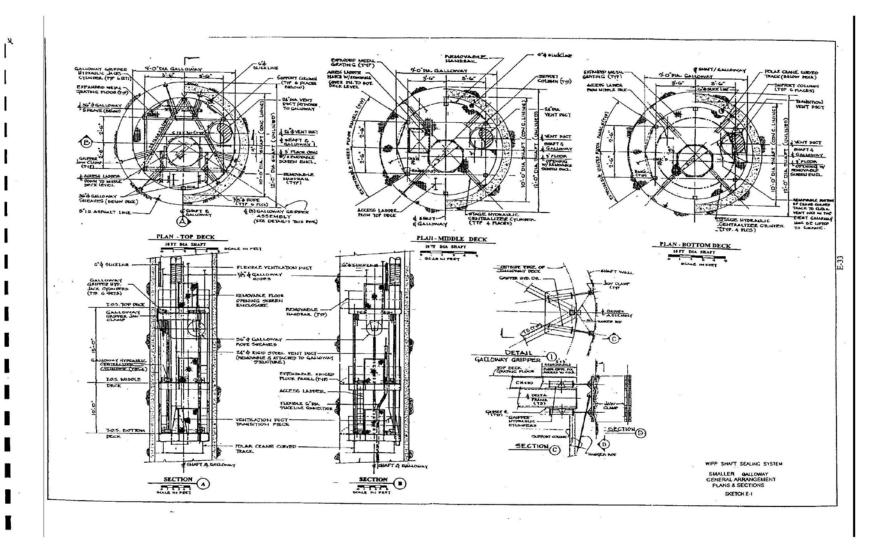
DRAWING NUMBER	TITLE	
SKETCH E-1	WIPP SHAFT SEALING SYSTEM SMALLER GALLOV/AY GENERAL ARRANGEMENT PLANS AND SECTIONS	
SKETCH E-2	WIPP SHAFT SEALING SYSTEM LARGER GALLOWAY GENERAL ARRANGEMENT PLANS AND SECTIONS	
SKETCH E-3	WIPP SHAFT SEALING SYSTEM TYPICAL HEADFRIME PLANS AND SECTIONS	
SKETCH E-4	WIPP SHAFT SEAL NG SYSTEM PERSPECTIVE HEADFRAME AND ASSOCIATED SURFACE FACILITIES	

4

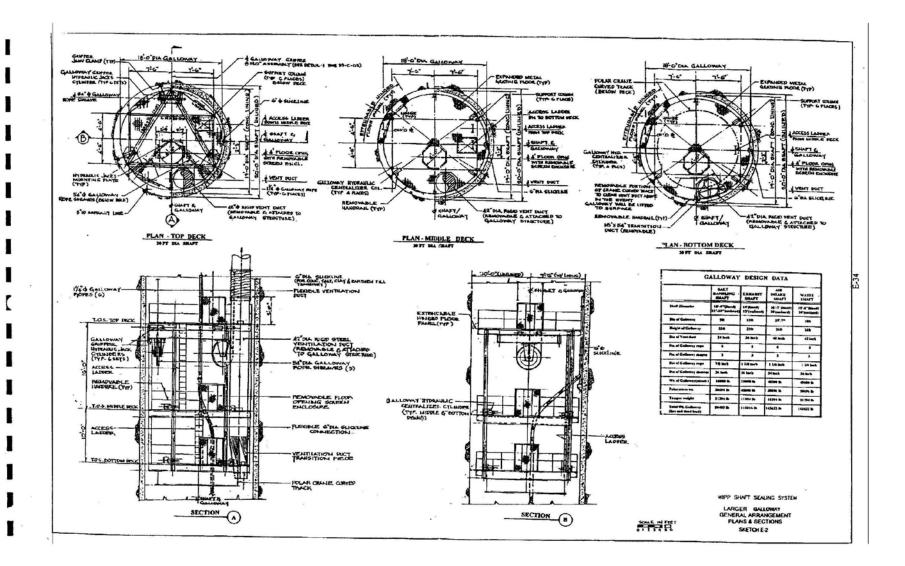
1

List of Sketches

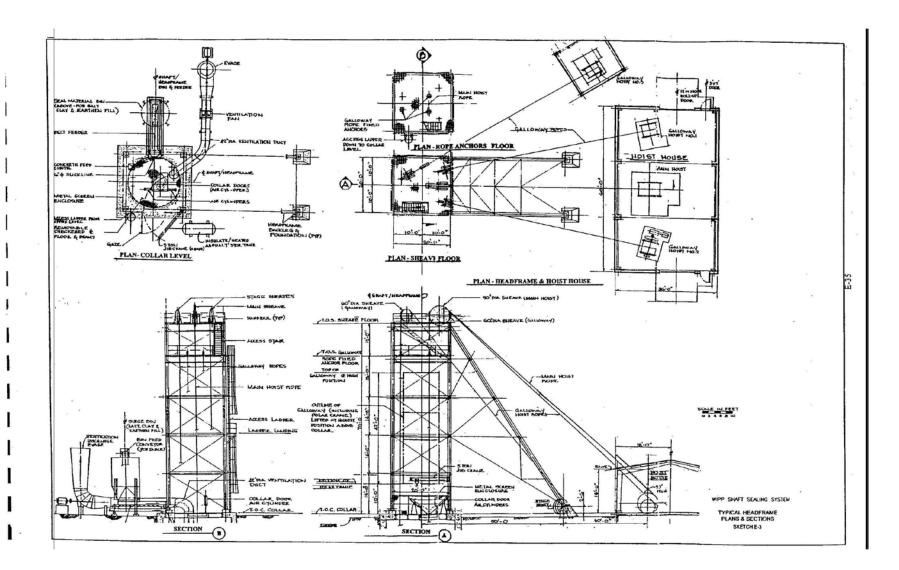
E-32



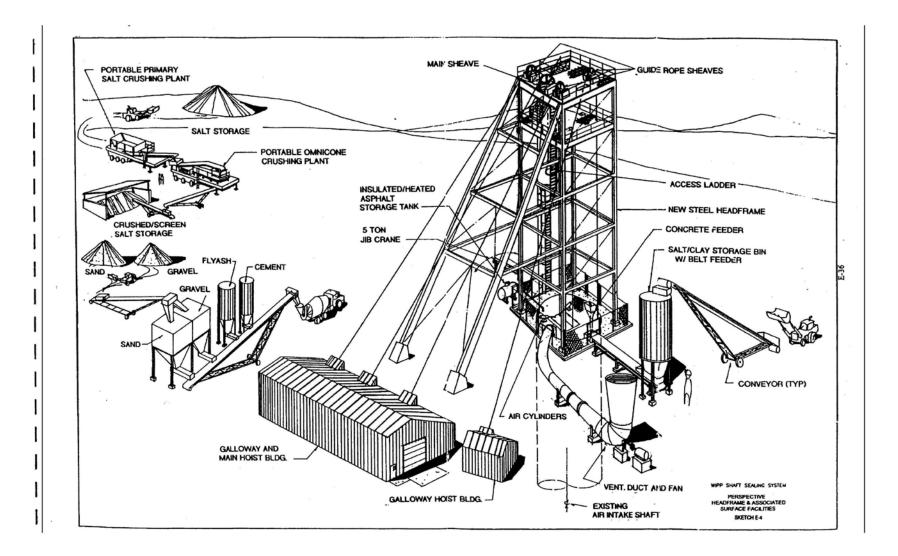
WIPP Shaft Sealing System Smaller Galloway Genral Arrangement Plans and Sections



WIPP Shaft Sealing System Larger Galloway General Arrangement Plans and Sections



WIPP Shaft Sealing System Typical Headframe Plans and Sections



WIPP Shaft Sealing System Typical Headframe and Associated Surface Faclities

WIPP UC721 Distribution List

Federal Agencies

US Department of Energy (4) Office of Civilian Radioactive Waste Mgmt. Atm: Deputy Director, RW-2 Acting Director, RW-10 Office of Human Resources & Admin. Director, RW-30 Office of Program Mgmt. & Integ. Director, RW-40 Office of Waste Accept., Stor., & Tran. Forrestal Building Washington, DC 20585

Atta: Project Director (2) Yucca Mountain Site Characterization Office Director, RW-3 Office of Quality Assurance 101 Convention Center Drive, Suite //P-110 Las Vegas, NV 89109

US Department of Energy Albuquerque Operations Office Atta: National Atomic Museum Library P.O. Box 5400 Albuquerque, NM 87185-5400

US Department of Energy Research & Waste Management Division Atta: Director P.O. Box E Oak Ridge, TN 37831

US Department of Energy (8) Carlsbad Area Office Atta: G. Dials D. Galkraith (3) M. Matthews M. McFadden R. Lark J. A. Mewhinney P.O. Box 3090 Carlsbad, NM \$8221-3090

US Department of Energy Office of Environmental Restoration and Waste Management Atm: J. Lytle, EM-30 Forrestal Building Washington, DC 20555-0002 US Department of Energy (3) Office of Environmental Restoration and Waste Management Atta: M. Frei, EM-34, Trevion II Washington, DC 20585-0002

US Department of Energy Office of Environmental Restoration and Waste Management Attm: S. Schneider, EM-342, Trevion II Washington, DC 20355-0002

US Department of Energy (2) Office of Environment, Safety & Health Attu: C. Borgstrom, EH-25 R. Pelletier, EH-231 Washimeton, DC 20585

US Department of Energy (2) Idaho Operations Office Fuel Processing & Waste Mgmt. Division 785 DOE Place Idaho Falls, ID 83402

US Environmental Protection Agency (2) Rediation Protection Programs Atm: M. Oge ANR-460 Washington, DC 20460

Boards

Defense Nuclear Facilities Safety Board Attn: D. Winters 625 Indiana Ave. NW, Suite 700 Washington, DC 20004

Nuclear Waste Technical Review Board (2) Atta: Chairpaan S. J. S. Parry 1100 Wilson Bivd., Suite 910 Arlington, VA 22209-2297

State Agencies

Attorney General of New Mexico P.O. Drawer 1508 Santa Fe, NM 87504-1508 Environmental Evaluation Group (3) Attn: Library 7007 Wyoming NE, Suite F-2 Albuquerque, NM 87109

Metropolitan Water District of Southern Calif. Attn: J. Narvaiz P.O. Box 54153 Los Aageles, CA 90071-3123

NM Energy, Minerals, and Natural Resources Department Attas: Library 2040 S. Pachecoo Santa Fe, NM \$7505

NM Environment Department (3) Secretary of the Environment Atta: Mark Weidler 1190 St. Francis Drive Sunta Fe, NM 87503-0968

NM Bureau of Mines & Mineral Resources Socorro, NM \$7801

NM Environment Department WIPP Project Site Attn: P. McCasland P.O. Box 3090 Carlsbad, NM 88221

Laboratories/Corporations

Bencile Pacific Northwest Laboratories (2) Attu: R. E. Westerman R. Romiae, MS P8-38 P.O. Box 999 900 Battelle Blvd. Richland, WA 99352

Brookhaven National Laboratory Atm: P. D. Moskowitz Environmeatul & Waste Technology Center Building 830

Upton, NY 11973 Harnischfeger Corp.

Phonex Engineering Services Attn: R. Luebke 2969 S. Chase Avenue Milwaukee, WI 53207-6408

lan Clelland 6656 N. Amdahl Dr. Tucson, AZ 85704

WIPP Shaft Sealing Design System UC721 Distribution List

INTERA, Jac. Atta: G. A. Freeze 1650 University Blvd. NE, Suite 300 Atbuquerque, NM \$7102

> INTERA, Inc. (6) Atm; J. F. Pickens V. Kelley M. Roeves W. Statham J. Beach D. Fryar INTERA WIPP Library 6850 Austin Center Bird., Suite 300 Austin, TX 78731

INTERA, Inc. Attn: J. Lee, YMP PA Dept. 1261 Town Center Drive Las Vegas, NV 89134

INTERA, Inc. Attn: W. Stemsrud P.O. Box 2123 Carlsbad, NM \$8221

Istasce Consulting Group, Inc. Atta: John Timeoci Thresher Square East 708 South Third Street, Suite 310 Minnespolis, MI 55415

Los Alamos National Laboratory Atta: B. Erdal, INC-12 P.O. Box 1663 Los Alamos, NM 87544

Morton International, Morton Salt Attn: H. W. Diamond Morton International Building 100 N. Riverside Plaza, Randolph Street at the River Chicago, IL 60606-1597

Parsons Brinckerbolf Energy Services, Inc. Atm: W. S. Roman One Penn Plaza New York, NY 10119

Parsons Brinckerhoff Energy Services, Inc. (2) Attn: B. W. Lawerance C. D. Maun M. S. Lin 303 Second Street Suite 230 North San Francisco, CA 94107

page 1

Distrib

Parsons Brinckerhoff International, Inc. Atin: Mary Ann Novak. 700 11th Street, NW, Suite 710 Washington, DC 20001

Phillips Mining, Geotechnical & Grouting Ann: Stephen Phillips 8640 North Glenhurst Place Tucson, AZ \$5704

RE/SPEC, Inc. (5) Ann: L. Van Sambeck (3) G. Callahan M. Loken J. Raifgan T. Pfeifle 3124 Jet Drive P.O. Box 725 Rapid City, SD 57709

RE/SPEC, Inc Attn: Angus Robb 4775 Indian School NE, Suite 300 Albuquerque, NM 87110-3927

Science Applications International Corp. Attn: W. Thompson 15000 W. 6th Avenue, Suite 202 Golden, CO 80401

Tech Reps, Inc. (3) Attn: J. Chapman (1) L. Robledo (2) 5000 Marble NE, Suite 222 Albuquerque, NM 87110

Westinghouse Electric Corporation (5) Atta: Library J. Epstein J. Lee B. A. Howard R. Kehrman P.O. Box 2078 Carlsbad, NM 88221

S. Cohen & Associates Attn: Bill Thurber 1355 Beverly Road McLean, VA 22101

> National Academy of Sciences, WIPP Panel

Howard Adler Oxyrase, Incorporated 7327 Oak Ridge Highway Knoxville, TN 37931 Bob Andrews Board of Radioactive Waste Management GF456 -2101 Constitution Ave. Washington, DC 20418

Rodney C. Ewing Department of Geology University of New Mexico Albuquerque, NM 87131

Charles Fairhurst Department of Civil and Mineral Engineering University of Minnesota 500 Fillsbury Dr. SE Mianeapolis, MN 55455-0220

B. John Garrick PLG Incorporated 4590 MacArthur Blvd., Suite 400 Newport Beach, CA 92660-2027

Leonard F. Konikow US Geological Survey 431 National Center Reston, VA 22092

Carl A. Anderson, Director Board of Radioactive Waste Management National Research Council HA 456 2101 Constitution Ave. NW Washington, DC 20418

Christopher G. Whipple ICF Kaiser Engineers 1800 Harrison St., 7th Floor Oakland, CA 94612-3430

John O. Blomeke 720 Clubhouse Way Knoxville, TN 37909

Sue B. Clark University of Georgia Savanaah River Ecology Lab P.O. Drawer E Aiken, SC 29802

Konrad B. Krauskopf Department of Geology Stanford University Stanford, CA 94305-2115 Della Roy Pennsylvania State University 217 Materials Research Lab Hastings Road University Park, PA 16802

David A. Waite CH₂ M Hill P.O. Box 91500 Bellevue, WA 98009-2050

Thomas A. Zordon Zordan Associates, Inc. 3807 Edinburg Drive Murrysville, PA 15668

Universities

Harvey Mudd College Attn: M. Cardenas Department of Engineering Claremont, CA 91711

New Mexico State University Waste-management Education & Research Corporation. Attn: R. Bhada P.O. Box 3001 Las Cruces, NM \$8003-8001

University of California Department of Mechanical and Environmental Engineering Atta: E. Marschall University of California Santa Barbara, CA 93106

University of Nevada-Reno Department of Mining Engineering Mackay School of Mines Atm: J. Daamen Reno, NV 89557

University of New Mexico Center for Radioactive Waste Management Atta: W. Lutze 209 Faris Engineering Building Albuquerque, NM \$7131-1341

University of New Mexico Department of Civil Engineering Attn: J. C. Stormont Albuquerque, NM \$7131-1351 University of New Mexico Geology Department Attn: Library 141 Northrop Hall Albuquerque, NM \$7131

University of Washington College of Ocean & Fishery Sciences Attn: G. R. Heath 583 Henderson Hall, HN-15 Seattle, WA 98195

Libraries

Thomas Branaigan Library Atta: D. Dresp 106 W. Hadley St. Las Cruces, NM 88001

Government Publications Department Zimmerman Library University of New Mexico Albuquerque, NM 87131

New Mexico Junior College Panaell Library Attn: R. Hill Lovington Highway Hobbs, NM 88240

New Mexico State Library Attn: N. McCallan 325 Don Gaspar Santa Fe, NM \$7503

New Mexico Tech Martin Specre Memorial Library Campus Street Socorro, NM \$7810

WIPP Public Reading Room Carlsbad Public Library 101 S. Halagueno St. Carlsbad, NM \$8220

Foreign Addresses

Atomic Energy Canada Ltd. (5) Whiteshell Laboratory Atta: Neil Chandler Glenn McCrank B. Goodwin Maleolm Gray Maria Onefrei Pinawa Manisoba, CANADA ROE 1L0

WIPP Shaft Sealing Design System UC721 Distribution List

page 2

2

Distribution

Francois Chenevier (2) ANDRA Route de Panorama Robert Schumann B, P. 38 92266 Fontenay-aux-Roses, Cedex FRANCE

Claude Sombret Ceaure d'Etudes Nucleaires de la Vallee Rhone CEN/VALRIIO S.D.II.A. B.P. 171 30205 Bagnols-Sur-Ceze, FRANCE

Commissariat a L'Energie Atomique Attn: D. Alexandre Centre d'Eludes de Cadarache 13108 Saint Paul Lez Durance Cedex FRANCE

Bundesanstak für Geowissenschaften und Rohsioffe (2) Attn: M. Langer M. Wallner Postfach 510 153 D-30531 Hannover, GERMANY

Bundesministerium fur Forschung und Technologie Postfach 200 706 5300 Bonn 2, GERMANY

Forschungszentrum Karlsruhe GmbH Institut für Nukleare Enteorgungstechnik Atta: E. Korthaus Postfach 3640, D-76021 Karlsruhe Bundesrepublic Deutchland GERMANY

Gesellschaft für Anlagen und Reaktorsicherheit (GRS) Atia: B. Balues Schwertwergasse 1 D-30667 Cologne, GERMANY

Grundbau Und Felsbau GmbH Attn: W. Wittke Henricistraße 50 52072 Aachen, GERMANY

Institut Für Gebirgsmechanik Attn: W. Minkley Friederikenstraße 60 04279 Leipzig, GERMANY

1

Shingo Tashiro Japan Atomic Energy Research Institute Tokai-Mura, Ibaraki-Ken, 319-11 JAPAN Netherlands Energy Research Foundation ECN Aun: J. Prij 3 Westerduinweg P.O. Box I 1755 ZG Petten THE NETHERLANDS Universiteit Utrecht Department of Geology (HPT-lab) Atta: C. J. Spiers PO Box \$9021 NL-3508 TA Utrech **Budapestlaan** 4 THE NETHERLANDS Svensk Kambransleforsorjning AB Attn: F. Karlsson Project KBS (Kambranslesakerhet) Box 5864 S-102 48 Stockholm SWEDEN Nationale Genossenschaft für die Lagerung Radioaktiver Abfalle (2) Atta: S. Vomvoris P. Zuidema Hardstrasse 73 CH-5430 Wettingen SWITZERLAND AEA Technology Attn: J. H. Rees D5W/29 Culham Laboratory Abington, Oxfordshire OX14 3DB UNITED KINGDOM AEA Technology Atta: W. R. Rodwell

Institut Für Tieflagerung

Theodor-Heuss-Strasse 4

D-3300 Braunschweig, GERMANY

Atta: K. Kuha

Autor W. K. Kowen 044/A31 Winfridt Technical Centre Dorchester, Dorset DT2 8DH UNITED KINGDOM AEA Technology

Atta: J. E. Tinson B4244 Harwell Laboratory Didcot, Oxfordshire OX11 ORA UNITED KINGDOM Internal

MS Org. 0483 5165 R. E. Stinebaugh 0706 6113 J. K. Lina 1320 6719 E. J. Nowak 1322 6121 J. R. Tillerson (10) 1322 6121 E. H. Ahrens (2) 1322 6121 A. W. Dennis (10) 1322 6121 F. D. Hansen 1322 6121 L. D. Hurtado 1322 6121 M. K. Knowles 1324 6115 P. B. Davies 1325 6852 L. S. Costin 1325 6852 R. E. Finley 1328 6749 D. R. Anderson 1328 6741 H. N. Jow 1328 6849 M. F. Fewell 1328 6849 P. Vaugha 1335 6705 M. Chu 1341 6748 J. T. Holmes 1395 6200 L. Shephard 1395 6707 M. Marietta 1395 6841 V. H. Slaboszewicz 1330 6752 B. J. Pierson (2) 1330 6752 NWM Library (100) 9018 8523-2 **Central Technical Files** 0199 4414 Technical Library (5) 0619 12630 **Review and Approval Desk**, For DOE/OSTI (2)

WIPP Shaft Sealing Design System UC721 Distribution List

page 3

e

Distribution

ATTACHMENT G3

RADIOLOGICAL SURVEYS TO INDICATE POTENTIAL HAZARDOUS WASTE RELEASES

ATTACHMENT G3

RADIOLOGICAL SURVEYS TO INDICATE POTENTIAL HAZARDOUS WASTE RELEASES

TABLE OF CONTENTS

G3-1	Purpose	.2
G3-2	Definition	.2
G3-3	Discussion G3-3a Nature of the Hazardous Waste Portion of TRU Mixed Waste G3-3b Nature of the TRU Mixed Waste G3-3c Nature of the Releases	.2 .4
G3-4	Application of Radiological Surveys G3-4a TRU Mixed Waste Processing G3-4b TRU Mixed Waste Releases G3-4c Decontamination Activities at Closure	.5 .5

LIST OF TABLES

Table

Title

- Table G3-1
 Summary of Waste Generation Processes and Waste Forms
- Table G3-2Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-
II/HalfPACT)
- Table G3-2a Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-III)
- Table G3-3 Radiological Surveys During RH TRU Mixed Waste Processing

ATTACHMENT G3

RADIOLOGICAL SURVEYS TO INDICATE POTENTIAL HAZARDOUS WASTE RELEASES

4 G3-1 Purpose

1

Within the Resource Conservation and Recovery Act (RCRA) Permit for the Waste Isolation
 Pilot Plant (WIPP), <u>detection of</u> radiological <u>contamination on surfaces</u> <u>monitoring</u> is used to
 <u>indicatedetermine</u> whether a potential release of hazardous constituents has occurred. This
 method is used in addition to the visual examinations and container inspections mandated by
 the <u>PermitRCRA</u>.

10 G3-2 Definition

- 11 This Permit Attachment describes the principle of co-detection. Co-detection is defined as the
- 12 process of identifying hazardous waste releases from containers of transuranic (TRU) mixed
- ¹³ <u>waste by</u>procedures for performing radiological surveys <u>on surfaces and assuming</u>to indicate
- 14 the <u>release</u>potential for hazardous waste releases from containers by virtue of detection of a
- 15 radioactive constituent indicates the concurrent release of a hazardous waste
- 16 <u>constituent</u>release. <u>Co-detection does not apply to the gaseous</u>These procedures assume the
- 17 potential co-release of hazardous and radioactive materials and applies to all releases except
- the release of volatile organic compounds (**VOC**) from transuranic (TRU) mixed waste
- 19 containers nor does it apply to the detection of radioactive constituents in water. Radiological
- surveys are used to indicate the potential presence or absence of hazardous waste constituents
- ²¹ based on the presence or absence of <u>radioactive constituents</u>radioactivity <u>on surfaces</u>.
- Radiological surveys do not provide <u>anany</u> assessment with regard to <u>the</u> concentration<u>s of</u>
- 23 <u>hazardous waste constituents</u>, since these surveys do not actually detect hazardous waste
- constituents.
- 25 G3-3 Discussion

Radiological surveys provide the <u>Permittees</u><u>WIPP facility</u> with a very sensitive method of indicating the potential <u>spill or</u> release of non-VOC hazardous waste constituents through the use of surface sampling (swipes) and radioactivity counting. This approach depends on the nature of the hazardous waste portion of the TRU mixed waste, the nature of the TRU mixed

- 30 waste, and the nature of the spills or release. The sections below discuss each of these factors.
- 31 G3-3a Nature of the Hazardous Waste Portion of TRU Mixed Waste
- 32 <u>The hazardous waste constituents in Based on the waste codes listed in the Part A (Permit</u>
- Attachment B) and discussed in the WIPP Waste Analysis Plan (Permit Attachment C), the
- hazardous waste constituents in WIPP TRU mixed waste <u>areconsist</u> mainly <u>U.S. Environmental</u>
- 35 Protection Agency (EPA) of EPA F-coded solvents and metals that exhibit the toxicity
- 36 characteristic. The TRU mixed wastes that are to be shipped to the WIPP facility for disposal
- have been placed into waste categories based on their physical and chemical properties. Waste
- category information is summarized in Table G3-1 with emphasis on the process that generated
- the waste. The waste generating processes can be described in five general categories:

- 1. Wastes (such as combustible waste) that result from cleaning and decontamination 1 activities in which items such as towels and rags become contaminated simultaneously 2 with hazardous and radioactive constituents and radioactivity. In these cases, the 3 hazardous constituent and the radioactive constituent are intimately mixed, both on the 4 rag or towel used for cleaning and as residuals on the surface of the object being 5 cleaned. These waste forms are not homogeneous in nature; however, they are 6 generated in a fashion that distributesensures that the hazardous and radioactive 7 contaminants coexist throughout the waste matrix. 8
- 2. Wastes generated when materials that contain metals that are believed to exhibit the 9 toxicity characteristic become contaminated with radioactive constituents radioactivity as 10 the result of plutonium operations (leaded rubber, some glass, and metal waste are 11 typical examples). These materials may also become contaminated with solvents during 12 decontamination or plutonium recovery activities. 13
- A class of processes where objects that are not metals are used in plutonium processes 14 and become contaminated with radioactive constituents radioactivity. They are 15 subsequently cleaned with solvents to recover plutonium. Surfaces of these objects 16 (such as graphite, filters, and glass) may beare contaminated with both radioactive 17 constituents and hazardous constituents. 18
- 4. Waste generating processes involving foundry operations where impurities are removed 19 from plutonium. These impurities may result in the deposition of toxicity characteristic 20 metals on the surfaces of objects, such as firebrick, ceramic crucibles, pyrochemical 21 salts, and graphite, which are contaminated with residual guantities of radioactive 22 constituentsradioactivity. 23
- 5. In all of the process waste categories in the second half of the attached table G3-1. 24 the hazardous constituent and the radioactive constituents radioactivity are physically 25 mixed together as a result of the treatment process. In these wastes, the spill or release 26 of any portion of the waste matrix maywill involve both the hazardous waste and the 27 radioactive waste components, because the treatment process generates a relatively 28 homogeneous waste form. 29
- Some waste forms only contain radioactive contamination on the surface, because they are not 30 the result of a treatment process or are not porous in form. These include glass, leaded rubber, 31 metals, graphite, ceramics, firebricks, and plastics. In theory, a hazardous waste release could 32 occur if the interiors of these materials became exposed and were involved in a release or spill. 33 Such an occurrence is not likely during operations, because no activities are planned or 34
- anticipated that would result in the breaking of these materials to expose fresh surfaces. 35
- Based on the information in the attached table and the discussion above, hazardous constituent 36
- releases could potentially occur in eitherenly one of two forms: 1) VOCs or and 2) particulate 37
- resulting from the catastrophic failure of the confinement capability of a container. Mechanisms 38
- that can initiate releases in these forms are discussed subsequently. Regardless of how the 39 release occurs, the nature of the waste and the processes that generated it is such that the
- 40 radioactive and hazardous components are assumed to be intimately mixed:- A a release of one
- 41
- without the other is not likely, except for releases of VOCs from containers. 42

1 G3-3b Nature of the TRU Mixed Waste

TRU mixed waste is defined as transuranic waste which is also a hazardous waste. The 2 processes responsible for the radioactive constituents radioactivity in the waste are, for the most 3 part, the same processes responsible for making it a hazardous waste. Therefore, the TRU 4 mixed waste forms are described in terms of both radioactive and hazardousclasses of waste 5 (radioactive and hazardous). The Permit Treatment, Storage, and Disposal Facility Waste 6 Acceptance Criteria (TSDF-WAC) in Permit Part 2 places limits on the characteristics of the 7 waste that can be shipped to the WIPP facility based on the characteristics of the waste form. 8 According to the TSDF-WAC, certain waste forms with specific characteristics are not allowed at 9 the WIPP facility. Waste with liquid in excess of the TSDF-WAC limits is one waste form that is 10 not allowed. Other limitations include, but are not limited to, a prohibition on pyrophoric 11 materials, corrosive materials, ignitable waste, and compressed gases. Furthermore, payload 12 containers of TRU waste must contain 100 nanocuries or more of transuranic elements per 13 gram of waste, which means that the radioactive component of the waste will always be present 14 within the waste in significant concentrations. The TSDF-WAC limitations and restrictions are 15 provided to ensure that any waste form received at the WIPP facility is stable and can be 16 managed safely. 17

One benefit of waste form restrictions, such as no liquid in excess of the TSDF-WAC limits, is that they limit the kinds of releases that could occur to those that would be readily detectable through visual inspection (i.e., large objects that fall out of ruptured containers) or through the use of <u>radiological detection</u> radiation monitoring either locally or within the adjacent area to detect materials that have escaped from containers.

23 G3-3c Nature of the Releases

24 The WIPP facility <u>personnel</u> will handle only sealed containers of <u>TRU mixed</u> waste and derived

²⁵ waste. The practice of handling sealed containers minimizes the opportunity for releases or

spills. For the purposes of safety analysis (DOE $\frac{2018}{1997}$)¹, it was assumed that releases and

spills during operations occur by either of two mechanisms: 1) surface contamination and 2)
 accidents.

29 Radioactive materials releases resulting from unique and representative hazard evaluation

30 events areSurface contamination is documented in the WIPP Documented Safety Analysis

31 (DSA)Safety Analysis Report (SAR) (DOE 20181997). Surface contamination of a waste

<u>container is considered</u> to be <u>athe only</u> credible source of contamination external to the

containers during normal operations. Surface contamination is assumed to be caused by waste
 management activities at the generator site that result in the contamination of the outside of a

waste container. Contamination would most likely be particulates (dirt or dust) that would be

- deposited during generator-site handling/loading activities. This contamination may not be
- detected by visible inspections. Surface contamination is <u>detected monitored upon after</u> arrival at
- the WIPP facility through the use of swipes and radiation monitoring surveying equipment, as
- 39 specified in radiological control procedures pursuant to 10 CFR Part 835. Surveying for
- 40 radioactive constituents allows for the detection of contamination that may not be visible on the
- 41 <u>surface of the container.</u>WIPP Procedure WP 12-HP1100, "Radiological Surveys" (DOE, 1995).
- 42 WP 12-HP1100 is a technical procedure that provides specific methods and guidance for

1 performing surface contamination and dose rate surveys of items, equipment, and areas, but

2 does not cover the monitoring of personnel. Detection using radioactivity is very sensitive and

3 allows for the detection of contamination that may not be visible on the surface of the container.

4 This exceeds the capability required by the RCRA, which is generally limited to inspections that

5 detect only visible evidence of spills or leaks. RCRA-required inspections are specified in Permit

6 <u>Attachment EPart 3</u>.

7 Releases due to accidents are modeled in the WIPP <u>DSASAR</u>. Significant accidents within the

8 waste handling process are assumed to result in the release of radioactive contaminants and

9 VOCs. Radioactive For the purposes of co-detection, releases are detectable using surface-

- 10 <u>contamination detection</u>sampling (swipe) techniques.
- 11 G3-4 Application of Radiological Surveys

Radiological surveys apply to many situations calling for sampling or monitoring surveying to 12 indicate the potential for nonvolatile-releases. This includes initial sampling for surface 13 radiological contamination upon receipt, sampling for contamination during waste handling 14 activities, sampling for contamination during decommissioning, sampling for contamination 15 during packaging for off-site shipment, and sampling to demonstrate the effectiveness of 16 decontamination activities that follow a release or spill and retrieval. Radiation monitoring and 17 sampling are Radiological surveying is mandated by DOE Orders and provide an immediate 18 indication of a radiological release or spill, even when they there are not no visibly detectable 19 indications. A release or spill involving hazardous constituents (except VOCs) will also likely 20 involve a release or spill of radioactivityradioactive constituents, based on the processes that 21 generated the waste and the physical form of the waste. These processes mixed the hazardous 22 and radioactive components, as described in Table G3-1, to the extent that detection of the 23 radioactive component can indicate the potential that the hazardous component is also present 24 on a contaminated surface. Radiological surveys to indicate the potential for hazardous waste 25 releases will be performed as specified in the following sections. 26

27 G3-4a TRU Mixed Waste Processing

Tables G3-2, <u>G3-2a</u>, and G3-3 specify the various steps in the process of receiving and

disposing containers of CH TRU mixed waste, including RH TRU mixed waste in shielded

30 containers and RH TRU mixed waste, respectively, where radiological surveys will be performed

31 by the Permittees in accordance with radiological control procedures pursuant to 10 CFR Part

32 835. WIPP Procedure WP 12-HP1100 provides the detailed description of methods and

³³ equipment used when performing surface contamination surveys, dose rate surveys, and large

34 area wipes.

35 G3-4b TRU Mixed Waste Releases

The RCRA Contingency Plan (Permit Attachment D) specifies actions required by the

37 Permittees in the event of spills or leaking or punctured containers of CH and RH TRU mixed

38 waste. Following completion of decontamination efforts, the Permittees will perform hazardous

39 material sampling to confirm the removal of hazardous waste constituents from contaminated

40 <u>surfaces</u>.

1 <u>G3-4c</u> Decontamination Activities at Closure

2 The Closure Plan (Permit Attachment G, Section G-1e(2)) specifies decontamination activities

3 required by the Permittees at closure. Following completion of decontamination efforts, the

4 Permittees will perform hazardous material sampling to confirm removal of hazardous waste

5 constituents from contaminated surfaces.

1		TABLES

 Table G3-1

 Summary of Waste Generation Processes and Waste Forms

Waste Category	Hazardous Waste Codes	Description of Processes	Description of Waste Form <u>s</u>
Combustibles	F001, F002, F003, D008, D019	Cloth and paper wipes are used to clean parts and wash down gloveboxes. Wood and plastic parts are removed from gloveboxes after they are cleaned. Lead may occur as shielding tape or as minor noncombustible waste in this category.	Materials such as metals may retain traces of organics left on surfaces that were cleaned. Waste may remain on the cloth and paper that was used for cleaning or for wiping up spills.
Graphite		Graphite molds, which may contain impurities of metals, are scraped and cleaned with solvents to remove the recoverable plutonium.	Surfaces may retain residual solvents. Lead may be used as shielding or may be an impurity in the graphite.
Filters	F001, F002	Filters are used to capture radioactive particulate in air streams associated with numerous plutonium operations and to filter particulate from aqueous streams.	Filter media may retain organic solvents that were present in the air or liquid streams.
Benelex® and Plexiglas®	F001, F002, D008	Materials are used in gloveboxes as neutron absorbers. The glovebox assembly often includes leaded glass. All surfaces may be wiped down with solvents to remove residual plutonium.	Surfaces may retain residual solvents from wiping operations. Leaded glass may also be present.
Firebrick and Ceramic Crucibles	F001, F002, F005, D006, D007, D008	Firebrick is used to line plutonium processing furnaces. Ceramic crucibles are used in plutonium analytical laboratories. Both may contain metals as surface contaminants.	Metals deposited during plutonium refining or analytical operations could remain as residuals on surfaces. Surfaces may retain residual solvents.
Leaded Rubber	D008	Leaded rubber includes lead oxide impregnated materials such as gloves and aprons.	The leaded rubber could potentially exhibit the toxicity characteristic.
Metal	F001, F002, D008	Metals range from large pieces removed from equipment and structures to nuts, bolts, wire, and small parts. Many times, metal parts will be cleaned with solvents to remove residual plutonium.	Solvents may exist on the surfaces of metal parts. The metals themselves potentially exhibit the toxicity characteristic.
Glass	F001, F002, D006, D007, D008, D009	Glass includes Raschig rings removed from processing tanks, leaded glass removed from gloveboxes, and miscellaneous laboratory glassware.	Solvents may exist as residuals on glass surfaces and in empty containers. The leader glass may exhibit the toxicity characteristic.
Inorganic Wastewater Treatment Sludge	F001-F003, D006-D009, P015	Sludge is vacuum filtered and stabilized with cement or other appropriate sorbent prior to packaging.	Traces of solvents and heavy metals may be contained in the treated sludge which is in the form of a solid dry monolith, highly viscous gel-like material, or dry crumbly solid.

Waste Category	Hazardous Waste Codes	Description of Processes	Description of Waste Form <u>s</u>
Organic Liquid and Sludge	F001, F003	Organic liquids such as oils, solvents, and lathe coolants are immobilized through the use of various solidification agents or sorbent materials.	Solvents and metals may be present within the matrix of the solids created through the immobilization process.
Solidified Liquid	F001, F003, D006, D008	Liquids that are not compatible with the primary treatment processes and have to be batched. Typically these liquids are solidified with portland or magnesium cement.	Solvents and metals may be present within the matrix of the solids created through the immobilization process.
Inorganic Process Solids and Soil	F001, F002, F003, D008	Solids that cannot be reprocessed or process residues from tanks, firebrick fines, ash, grit, salts, metal oxides, and filter sludge. Typically solidified with portland or gypsum-based cements.	Solvents and metals may be present within the matrix of the solids created through the immobilization process.
Pyrochemical Salts	D007	Molten salt is used to purify plutonium and americium. After the radioactive metals are removed, the salt is discarded.	Residual metals may exist in the salt depending on impurities in the feedstock.
Cation and Anion Exchange Resins	D008	Plutonium is sorbed on resins and is eluted and precipitated.	Feed solutions may contain traces of solvents or metals depending on the preceding process.

Table G3-2 Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-II/HalfPACT)

Step in CH TRU Mixed Waste Processing	Surface Contamination Survey	Dose Rate Survey	Large Area Wipes ^a
Exterior of CH package after arrival at the WIPP facility	X	X	
<u>CH</u> Contact Handled <u>p</u> Package <u>o</u> Quter <u>o</u> Confinement <u>a</u> Assembly (OCA) lid interior and top of <u>i</u> Inner <u>o</u> Containment <u>v</u> Vessel (ICV) lid	х		х
CHContact Handled PPackage quick connect and vent port	х		
As ICV lid is raised		Х	
ICV lid interior and top of payload	Х		Х
Payload assembly, guide tubes, standard waste box (SWB) and ten-drum overpack (TDOP) connecting devices	х		
As payload assembly is raised, including bottom of payload	X	х	
After placement of payload on facility pallet	Х	X	Х

^a Surface contamination surveys of <u>CH</u>Contact Handled <u>P</u>Ackages are performed in accordance with <u>radiological</u> <u>control procedures pursuant to 10 CFR Part 835</u>Procedure WP 12-HP1100, which stipulates that all such work be performed under a Radiation Work Permit (**RWP**). The RWP will only stipulate large area wipes when necessary and not as a routine measure.

3

la

1

 Table G3-2a

 Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-III)

Step in CH TRU Mixed Waste Processing	Surface Contamination Survey	Dose Rate Survey	Large Area Wipes ^a
Exterior of TRUPACT-III on <u>after</u> arrival at <u>the WIPP</u>	х	х	
Interior of <u>o</u> Overpack <u>c</u> Over and exterior of <u>c</u> Overpack <u>c</u> Over and exterior of <u>c</u> Over and exterior of	х	х	х
TRUPACT-III verter performer terminal terminal set of the terminal set of term	х		
Interior of Containment Lid and front of SLB2	Х	Х	Х
As SLB2 is removed from TRUPACT-III		Х	
After placement of SLB2 on facility pallet	Х		Х

^a Surface contamination surveys of <u>CH</u>Contact Handled <u>p</u>Packages are performed in accordance with <u>radiological</u> <u>control procedures pursuant to 10 CFR Part 835</u>Procedure WP 12-HP1100, which stipulates that all such work be performed under an RWP. The RWP will only stipulate large area wipes when necessary and not as a routine measure.

Step in RH TRU Mixed Waste Processing	Surface Contamination Survey	Dose Rate Survey
Exterior of cask on after arrival at the WIPP facility	Х	Х
During After removal of impact limiters on RH-TRU 72-B cask	X	Х
During removal of outer lid closure from RH-TRU 72-B cask	Х	Х
During removal of inner lid closure from RH-TRU 72-B cask	Х	
During removal of upper impact limiter on the CNS 10-160B cask	×	Х
After removal of upper impact limiter on the CNS 10-160B cask	Х	Х
After removal of the CNS 10-160B cask from the lower impact limiter	x	Х
After transfer of the CNS 10-160B cask lid into the Hot Cell	Х	
During After transfer of waste drum carriages into the Hot Cell	Х	
During transfer of waste into the facility canister in the Hot Cell	Х	
During transfer of the waste canister from the RH-TRU 72-B cask to the facility cask	x	
Interior of shipping cask inside the RH Bay after unloading of waste canister or drums	x	
Exterior of shield plug subsequent to final canister emplacement		Х
Interior of facility cask after completion of waste emplacement	Х	

 Table G3-3

 Radiological Surveys During RH TRU Mixed Waste Processing

ADDENDUM G1

NEED FOR ADDITIONAL PANELS FOR THE TEN-YEAR HAZARDOUS WASTE FACILITY PERMIT RENEWAL

ADDENDUM G1

NEED FOR ADDITIONAL PANELS FOR THE TEN-YEAR HAZARDOUS WASTE FACILITY PERMIT RENEWAL

TABLE OF CONTENTS

	2	ł
G1-3 Description		1
G1-4.1 Panel 1 G1-4.2 Panels G1-4.3 Panel 7	Capacity:	5
G1-5 Equivalent Par	els of Lost Capacity	3
G1-6 Disposal Capa	city Needed in the Next 10-year Permit Term	3
G1-7 Conclusion	c)

1		LIST OF TABLES
2	Table	Title
3 4 5	Table 1 Table 2	Permitted, Actual, and Lost CH-TRU Mixed Waste Volume Lost TRU Mixed Waste Volume Capacity in Equivalent Panels
6		LIST OF FIGURES
7	Figure	Title
8 9 10 11 12	Figure 1 Figure 2 Figure 3	Status of Panels at the WIPP Facility Panel 1 Showing Waste Emplacement and Abandoned Rooms Panel 7 Showing Waste Emplacement and Abandoned Rooms (as of 3/1/2020)

13		ACRONYMS, ABBREVIATIONS, AND UNITS
14	СН	contact-handled
15	ft ³	cubic feet
16	HWDUs	Hazardous Waste Disposal Units
17	LWA	Land Withdrawal Act
18 19	MgO m ³	magnesium oxide cubic meter(s)
20	NMED	New Mexico Environment Department
21 22 23	Permit PMR PPE	Hazardous Waste Facility Permit Permit Modification Request personal protective equipment
24	RH	remote-handled
25	Salado	Salado Formation
26 27	TID TRU	Technical Incompleteness Determination transuranic
28	WIPP	Waste Isolation Pilot Plant
29		

ADDENDUM G1

NEED FOR ADDITIONAL PANELS FOR THE TEN-YEAR HAZARDOUS WASTE FACILITY PERMIT RENEWAL

4 G1-1 Purpose

1

The purpose of this paper is to discuss the need for additional underground panels at the Waste 5 Isolation Pilot Plant (WIPP) facility during the period covered by this Ten-Year Permit Renewal 6 Application. First, the Permittees will demonstrate that additional panels are needed to address 7 lost disposal capacity that has been realized over the operating life of the facility. Second, the 8 Permittees will demonstrate that more panels than are currently permitted will be needed over 9 the next ten years. Transuranic (**TRU**) mixed waste is disposed in underground hazardous 10 waste disposal units (HWDUs). The underground HWDUs are located at the WIPP facility 11 approximately 2,150 feet (665 meters) below the ground surface within the Salado Formation 12 (Salado). An underground HWDU consists of seven rooms and two access drifts excavated in 13 the Salado and designated for disposal of containers of TRU mixed waste. Each underground 14 HWDU, when filled, has been designed to accommodate a contact-handled (CH) TRU mixed 15 waste volume of 662,150 ft³ (18,750 m³) (based on the gross container volume of 89,286 55-16 gallon drums). This is referred to as the "disposal capacity" in this paper. The underground 17 HWDUs are designed to dispose both CH-TRU mixed and remote-handled (RH) TRU mixed 18 waste. The focus of this paper is on CH-TRU mixed waste since RH-TRU mixed waste is a 19 small fraction of the total TRU mixed waste inventory. 20

21 G1-2 Background

The WIPP facility is located in Eddy County in southeast New Mexico, 26 miles east of

23 Carlsbad, New Mexico. The WIPP facility is a mined geologic repository for the disposal of

defense-generated TRU waste and TRU mixed waste from various United States defense
 facilities.

The WIPP project was authorized by the U.S. Congress as Public Law 96-164. Subsequently, Congress enacted Public Law 102-579 as amended by Public Law 104-201, known as the Land Withdrawal Act (**LWA**), to designate the area to be used for the WIPP facility. As written in Section 7(a)(3) of the LWA, the total capacity of the WIPP facility by volume is 6.2 million cubic feet (**ft**³) (175,564 cubic meters (**m**³)) of TRU waste.

feet (ft³) (175,564 cubic meters (\mathbf{m}^3)) of TRU w

31 G1-3 Description

The WIPP facility is divided into surface structures, shafts, and underground structures. The surface structures accommodate the personnel, equipment, and support services required for

the receipt, preparation, and transfer of waste from the surface to the underground.

The Permittees dispose of TRU mixed waste at the WIPP facility in rooms mined out of a salt

³⁶ formation approximately 2,150 feet (655 meters) below the surface. Waste is emplaced in

37 Resource Conservation and Recovery Act permitted HWDUs commonly referred to as panels.

The current design of the WIPP repository consists of 10 panels. Panels 1-8 consist of seven

disposal rooms with an intake and an exhaust drift. Panels 9 and 10 are made up of a portion of

1 the main access drifts in the underground and have not been permitted for waste emplacement

2 (See Figure 1).

³ The first shipment of TRU waste disposed of at the WIPP facility was received in March 1999.

4 The Permittees have been emplacing waste at the WIPP facility on an on-going basis since the

5 receipt and emplacement of the first shipment with the exception of an approximately 3-year

6 interruption from 2014-2017. Panels 1-8 have been permitted for waste emplacement.

7 Regarding these panels, the Permittees have completed emplacement operations in Panels 1-6,

8 the Permittees are currently emplacing waste in Panel 7, and the Permittees are mining Panel 8

- and preparing it for future waste emplacement (See Figure 1). Panels 3-6 have been
- 10 permanently closed pursuant to the requirements of the WIPP Hazardous Waste Facility Permit
- (**Permit**) and the October 2014 Environmental Protection Agency final rule approving
- implementation of the Run-of-Mine Salt Panel Closure System.

13 G1-4 Lost Disposal Capacity:

Design of waste throughputs at the WIPP facility anticipated opening new panels for waste 14 emplacement approximately every 30 months. Therefore, panels were designed with a lifetime 15 of approximately 60 months, with the time split evenly between construction and emplacement. 16 The inability to use mined areas in any panel (i.e., the loss of disposal capacity) is, primarily due 17 to deterioration of the condition of the excavations (referred to as "ground conditions"). As is 18 common with most underground mined excavations, ground conditions deteriorate over time. 19 This notwithstanding, ground conditions can be maintained and kept safe for personnel for an 20 extended period of time using an active ground control maintenance program. 21

In order to reduce the effects of time on underground structures, the Permittees employ a "justin-time" philosophy to panel mining. Mining of a panel is planned to ensure that the panel will be ready and certified just before it is needed for waste emplacement (i.e., during the 30 months that the Permittees are filling a panel, the Permittees are also mining the next panel). The amount of active maintenance needed to keep the panel safe for workers emplacing waste is reduced with the "just-in-time mining" approach.

28 G1-4.1 Panel 1

Mining of Panel 1 began in May 1986. The panel was completed in 1988, anticipating that the 29 WIPP facility would be authorized to receive and emplace waste in 1988. However, the first 30 waste was not emplaced in Panel 1 until March 1999. This was far in excess of the anticipated 31 30-month emplacement period with the result that the Permittees had to perform extensive 32 maintenance of the ground in Panel 1 before waste emplacement was started. Even with this 33 effort, the Permittees made the decision to abandon rooms 6, 5, and 4 in Panel 1 due to the 34 deteriorating ground conditions (See Figure 2). The permitted maximum TRU mixed waste 35 disposal capacity of Panel 1 was 636,000 ft³ (18,000 m³); however, the final TRU mixed waste 36 volume emplaced in Panel 1 was 370,685.70 ft³ (10,496.65 m³), resulting in a loss of 37 265,314.30 ft³ (7,503.35 m³) of TRU mixed waste disposal capacity. Based on EQ1 below, the 38 lost disposal capacity in Panel 1 is the equivalent of 0.4 panels. 39

40 EQ1: # of Panels in Lost Disposal Capacity = Total Lost Disposal Capacity ÷ Total

41 Maximum Panel Disposal Capacity

- # of Panels in Lost Disposal Capacity (Panel 1) = 265,314.30 ft³ (7,503.35 m³) ÷ 636,000 ft³
 (18,000 m³)
- ³ # of Panels in Lost Disposal Capacity (Panel 1) = 0.4 panels
- 4 <u>G1-4.2 Panels 3, 4, 5 and 6.</u>
- 5 Table 1, Permitted, Actual, and Lost CH-TRU Mixed Waste Volume, shows the permitted
- 6 Maximum TRU mixed waste capacity for Panels 3-6 along with the final TRU mixed waste
- volume and the TRU mixed waste lost disposal capacity volume in the aforementioned panels.
- 8 Panel 2 is not included in Table 1 as the final TRU mixed waste volume is 99.9% of the
- 9 permitted maximum TRU mixed waste capacity.
- ¹⁰ Panels 3-6 were permitted for a CH-TRU mixed waste capacity of 662,150 ft³ (18,750 m³) each.
- 11 The total CH-TRU mixed waste capacity lost in Panels 3-6 was 468,145.05 ft³ (13,256.08 m³).
- 12 The number of panels in lost disposal capacity is calculated using EQ1 as follows:
- ¹³ # of Panels in Lost Disposal Capacity (Panels 3-6) = $468,145.05 \text{ ft}^3 (13,256.08 \text{ m}^3) \div 662,150 \text{ ft}^3$ (18,750 m³)
- ¹⁵ # of Panels in Lost Disposal Capacity (Panels 3-6) = 0.7 panels

The loss of disposal capacity in Panels 3 – 6 is not related to ground control. Instead it is the result of using a different mix of container sizes than anticipated when the permitted volumes were determined and the placement of backfill (magnesium oxide sacks (**MgO**)) in racks on the floor. The placement of MgO on the floor reduced the amount of available floor space for CH-TRU mixed waste emplacement.

21 G1-4.3 Panel 7

The Permittees began waste emplacement operations in Panel 7 in September 2013. Subsequent to a February 14, 2014, radiological release, the Permittees suspended waste emplacement in Panel 7. The Permittees placed the underground ventilation system in Filtration Mode as a result of the 2014 event, initially reducing the underground airflow to approximately 13% of pre-event airflow. Additional filtration capacity was added by the

- 27 Permittees to the ventilation system in the form of the Interim Ventilation System which allowed
- the Permittees to increase the underground airflow to 25% of the pre-event airflow.
- One impact of reduced airflow is a reduction in the amount of diesel equipment that can be
- 30 operated. As the Permittees stated in the *November 2016 Response to the Technical*
- Incompleteness Determination (**TID**) for the Class 3 Permit Modification Request (**PMR**) for
- 32 Modifications to the WIPP Panel Closure Plan:
- Due to the February 2014 events, the Permittees were not able to resume normal underground maintenance until November 2014, at which time ground control, including roof-bolting, was reinitiated...Currently, catch-up bolting in normally occupied uncontaminated areas is complete. Catch-up bolting continues in contaminated areas. This has been made more challenging since personnel now must wear additional PPE to protect against contamination and recover areas that could not be maintained by performing routine bolting.

1 The inability to perform routine bolting has led the Permittees to place access 2 restrictions on some areas in the underground. These areas are not considered 3 safe for normal access. Some of these restricted access areas are barricaded 4 and access is prohibited due to ground conditions.

The TID response provides an example of the consequences of not being able to perform 5 ground control maintenance operations for an extended period of time. The Permittees were 6 unable to perform ground control maintenance in the WIPP repository for approximately eight 7 months after the 2014 incident. Although the Permittees restarted ground control maintenance 8 in Panel 7 prior to allowing waste emplacement to begin, the low ventilation flow and the 9 requirement for the workers to wear additional personal protective equipment (PPE) has slowed 10 the ground control maintenance efforts. Because of the ground conditions in Panel 7 Room 4. 11 the Permittees prohibited the use of the room thereby creating a loss of emplacement capacity. 12 (See Figure 3). 13

In addition, Panel 7 Room 7 and Panel 7 Room 6 were lost for waste emplacement as a direct
 result of radiological contamination.

16 The abandonment of portions of Panel 7 in Rooms 7, 6, and 4 resulted in an estimated loss of

17 189,221 ft³ (5,358 m³) of TRU mixed waste volume capacity. Using EQ1, the loss is equivalent 18 to 0.3 panels.

- ¹⁹ # of Panels in Lost Capacity (Panel 7) = $189,221 \text{ ft}^3 (5,358 \text{ m}^3) \div 662,150 \text{ ft}^3 (18,750 \text{ m}^3)$
- ²⁰ # of Panels in Lost Capacity (Panel 7) = 0.3 panels
- 21 G1-4.4 Panels 9 and 10

Panels 9 and 10 consist of the main entries and cross-cuts from S-1600 to S-3650 (See Figure
1). The areas designated as Panels 9 and 10 were mined to be used for the operation of the
underground facility (i.e., ventilation, access, mining transportation, transportation of TRU waste
to Panels 1-8, etc.) with the intent that they would remain open for 25 to 30 years. Panels 9 and
10 were also available as waste disposal panels should they be needed in the original
configuration of the repository.

Engineering judgements of Panels 9 and 10 concluded that the relocation of Panels 9 and 10 28 was preferred over widening the main entries of Panels 9 and 10 to accommodate both CH-29 TRU and RH-TRU waste. Subsequently, the Permittees submitted a Class 3 PMR in March 30 2013 to develop two additional panels south of Panels 4 and 5 for waste emplacement in lieu of 31 using Panels 9 and 10. The two additional panels would have been named 9A and 10A and 32 would have had the same design dimensions as Panels 1-8. The New Mexico Environment 33 Department (NMED) issued a draft permit on February 14, 2014; however, the draft permit was 34 withdrawn due to the radioactive material release that occurred on the same day. 35

The preceding discussion illustrates the fact that the need for additional panels is not new, and has been documented previously.

The radiological event of 2014 had an impact on the potential use of Panels 9, 9A, 10, and 10A. Panels 9 and 10 both experienced radiological contamination in portions of the panels. Ground control efforts in Panel 9 after February 2014 could not be performed quickly enough in order to 1 make the ground safe throughout the panel. Based on the ground conditions and contamination

- 2 in portions of the Panel 9 area, a decision was made to abandon the potential use of Panel 9 for
- 3 waste emplacement and to withdraw the Class 3 PMR, Repository Reconfiguration, associated
- 4 with adding Panels 9A and 10A south of the existing panels. This PMR was withdrawn by the
- 5 Permittees on November 10, 2016. Panel closures were installed in the north-south mains (E-
- ⁶ 300, E-140, W-30, and W-170) between S2520 and S2750 to simultaneously close Panels 3-6,
- 7 remove Panel 9 from the ventilation system, and barricade entry to Panel 9. As stated in Permit
- 8 Attachment G, Section G-1e(1), if installing panel closures in the north-south mains is used,
- 9 then Panel 9 will not be used for TRU mixed waste disposal.

The Class 3 PMR, *Repository Reconfiguration*, submitted by the Permittees on March 18, 2013, proposed the additional CH-TRU mixed waste volume of 662,150 ft³ (18,750 m³) for each

- respective panel. This loss of the planned CH-TRU mixed disposal capacity is equivalent to an emplacement volume of two panels.
- Portions of Panel 10 were also contaminated during the 2014 radiological event. The reduction
 in ventilation flow in the underground has reduced the amount of ground control work that can
 be performed simultaneously, which has impacted portions of Panel 10. However, the
 Permittees are maintaining the option to seek a permit modification use all or portions of Panel
 10 for TRU mixed waste disposal, should it be determined to be needed and deemed practical.
 The decision to use Panel 10 would be made based the following considerations:
- Ground conditions in Panel 10 and associated remediation efforts
 - Radiological contamination in Panel 10
 - Availability of additional disposal capacity (i.e., additional panel)
- 23 G1-5 Equivalent Panels of Lost Capacity

21

- Table 2 presents the TRU mixed waste volume capacity lost from Panels 1, 3, 4, 5, 6, 7, 9, and 10 (9A and 10A equivalent volume as proposed in the March 2013 Class 3 PMR) in equivalent
- ²⁶ panels. Data are based on the information and calculations presented above.
- 27 G1-6 Disposal Capacity Needed in the Next 10-year Permit Term
- Panel 7 is currently the active waste emplacement panel and Panel 8 is currently being mined. 28 Pursuant to the 2020 Permit Renewal Part B Application, Attachment G, Table G-1, Panel 7 is 29 anticipated to be filled by September 2021 and Panel 8 is anticipated to be filled by May 2025. 30 Note 3 to Table G-1 of the 2020 Permit Renewal Part B Application states that it takes 31 approximately 30 months to fill a panel with waste. Based on the nominal time it takes to fill a 32 panel with TRU mixed waste, the current emplacement schedule, and the need to replace lost 33 waste volume capacity, a minimum of two additional panels will be needed during the next 10-34 year term of the Permit. 35
- The Permittees are currently working on a design and the regulatory documentation needed for
- additional panels. The Permittees are planning to submit a Class 3 PMR to add additional panels to the Permit in 2021.

1 <u>G1-7 Conclusion</u>

Waste emplacement capacity lost in Panels 1, 3, 4, 5, 6, 7, 9, and 10, is the equivalent of 3.4 typical panels used at the WIPP facility. This conclusion is based on the assumption that the Class 3 PMR adding Panels 9A and 10A would have been approved. Since partially mined panels are not part of the approved design, the 3.4 additional panels needed for CH-TRU emplacement is adjusted to four panels. The WIPP facility will need four additional HWDUs merely to regain the lost TRU mixed waste volume capacity.

Renewal Application Attachment G, Table G-1, indicates that a minimum of two additional
 panels will be needed during the next Permit renewal period.

TABLES

 Table 1

 Permitted, Actual, and Lost CH-TRU Mixed Waste Volume

Panel	Maximum CH-TRU Mixed Waste Capacity (ft ³)	Final CH-TRU Mixed Waste Volume (ft³)	Lost CH-TRU mixed waste capacity by volume (ft ³)
3	662,150 (18,750 m ³)	603,600.40 (17,092.06 m ³)	58,549.60 (1,657.94 m ³)
4	662,150 (18,750 m ³)	503,500.27 (14,257.54 m ³)	158,649.73 (4,492.46 m ³)
5	662,150 (18,750 m ³)	562,454.22 (15,926.93 m ³)	99,695.78 (2,823.07 m ³)
6	662,150 (18,750 m ³)	510,911.06 (14,467.39 m ³)	151,238.94 (4,282.61 m ³)
Total	2,648,600 (75,000 m ³)	2,180,454.95 (61,743.92 m ³)	468,145.05 (13,256.08 m ³)

NOTE: values in columns 2 and 3 are taken from Table 4.1.1 of the Permit for CH TRU Waste

 Table 2

 Lost TRU Mixed Waste Volume Capacity in Equivalent Panels

Panel	Equivalent Panel Lost
1	0.4
3, 4, 5, and 6	0.7
7	0.3
Proposed 9A and 10A	2
TOTAL	3.4

FIGURES

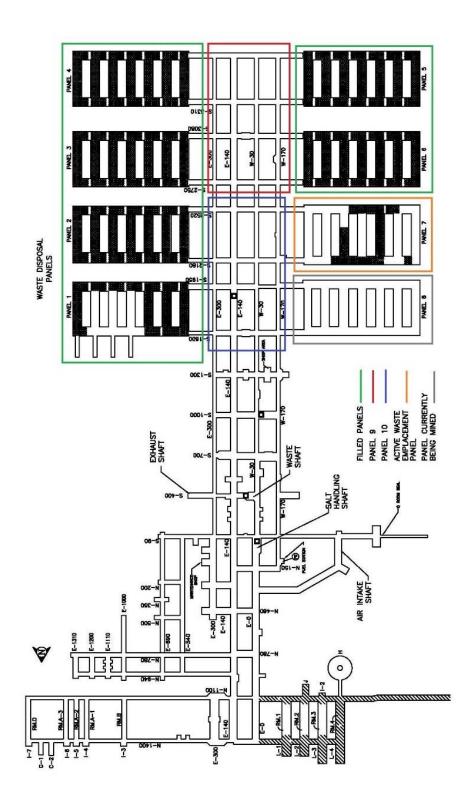


Figure 1 Status of Panels at the WIPP Facility

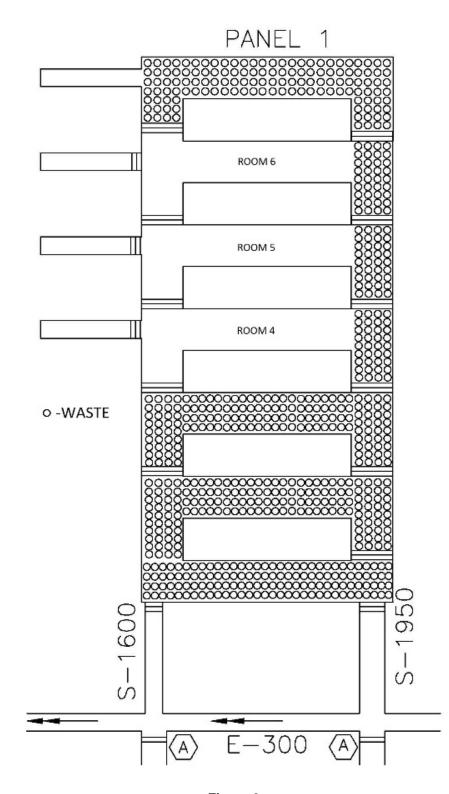


Figure 2 Panel 1 Showing Waste Emplacement and Abandoned Rooms

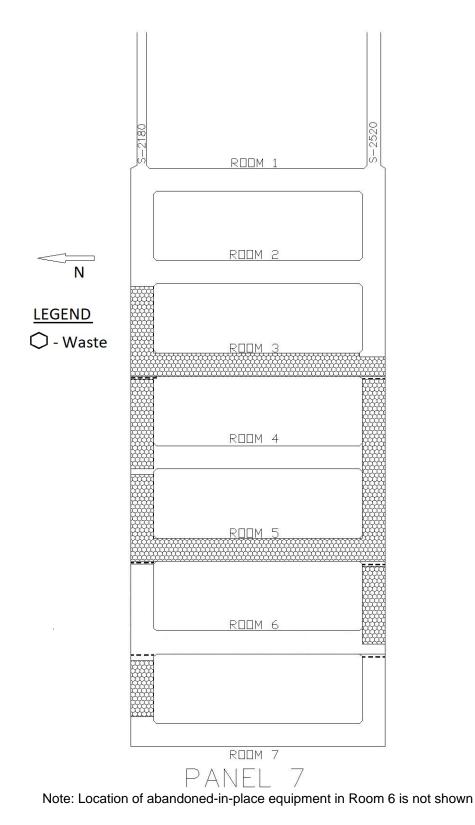


Figure 3 Panel 7 Showing Waste Emplacement and Abandoned Rooms (as of 3/1/2020)

ATTACHMENT H

POST-CLOSURE PLAN

ATTACHMENT H

POST-CLOSURE PLAN

TABLE OF CONTENTS

Introdu	uction	2
H-1	Post-Closure Plan H-1a Post-Closure Plan after Final Facility Closure H-1a(1) Active Institutional Controls H-1a(2) Monitoring	3 4
H-2	Notices Required for Disposal Facilities H-2a Post-Closure Certification H-2b Post-Closure Notices	6

1	ATTACHMENT H
2	POST-CLOSURE PLAN
3	Introduction
4	This Permit Attachment contains the Post-Closure Plan, which describes activities required to

maintain the Waste Isolation Pilot Plant (WIPP) <u>facility</u> after completion of <u>final</u> facility closure.
 Since the current plans for operations extend over several decades, the Permittees will
 periodically reapply for an operating permit in accordance with 20.4.1.900 <u>New Mexico</u>
 Administrative Code (NMAC) (incorporating Title 40 of the Code of Foderal Populations (CEP)

<u>Administrative Code (NMAC)</u> (incorporating <u>Title</u> 40 <u>of the Code of Federal Regulations (CFR)</u>
 §270.10(h)).

This plan was submitted to the New Mexico Environment Department (NMED) in accordance 10 with 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(13)) and the U.S. Environmental 11 Protection Agency (EPA). The Post-Closure Plan includes the implementation of institutional 12 controls to limit access and groundwater monitoring to assess disposal system performance. 13 Until final facility closure is complete and has been certified in accordance with 20.4.1.500 14 NMAC (incorporating 40 CFR §264.115), a copy of the approved Post-Closure Plan and all 15 approved revisions will be on file at the WIPP facility and will be available to the Secretary of the 16 NMED or the EPA Region VI Administrator upon request. 17

18 H-1 Post-Closure Plan

The post-closure care period begins after completion of closure of the first underground hazardous waste disposal unit (**HWDU**) and continues for 30 years after final closure of the facility. The post-closure care period may be shortened or lengthened by the Secretary of the NMED, based on evidence that human health and the environment are being protected or are at risk. During the post-closure period, the WIPP <u>facility</u> shall be maintained in a manner that complies with the environmental performance standards applicable to the facility. During this period, the Permittees will employ active institutional controls as necessary.

This post-closure plan focuses on activities following final facility closure. However, some 26 discussion of post-closure following panel closure is warranted since some panel closures will 27 occur long before final facility closure. As discussed in Attachment G (Closure Plan), Section G-28 1e(1), panel closures have been designed to require minimum post-closure maintenance. The 29 Permittees have defined a post-closure care program for closed panels that has three aspects. 30 These are routine inspection of the openings in the vicinity of the closures and bulkheads used 31 as part of the closures, coupled with the sampling of ventilation air for harmful 32 constituents repair or replacement of bulkheads that no longer serve their purpose as panel 33 closures:, the sampling of ventilation air for harmful constituents: and a Repository Volatile 34 Organic Compound Monitoring Program (RVMP). The rules of the Mine Safety and Health 35 Administration as well as Permit Attachment E (Inspection Schedule, Process and Forms) drive 36 the implementation of the first two programs. These rules require that underground mines 37 monitor air quality to assure good breathing air whenever personnel are underground and that 38 mine operators provide safe ground conditions for personnel in areas that require access. 39 Routine monitoring of the openings in the access ways to panels will be continued and these 40 openings will be maintained for as long as access into them is needed. This includes continued 41 reading of installed geomechanical instrumentation, sounding the areas, visual inspection and 42

1 maintenance activities as required and as described in Permit Attachment A2. In addition, all

- 2 areas in the underground that are occupied by personnel are checked prior to each day's work
- 3 activities for accumulations of harmful gases. Action levels for increasing ventilation to areas
- 4 that show high levels of harmful gases are specified as described in standard operating

5 procedures on file at the WIPP facility.

⁶ These mMonitoring programs will be carried out during the period between the closure of the

7 first panel and the initiation of final facility closure for the underground facility. The Permittees

8 have prepared a Volatile Organic Compound Monitoring Plan (VOCMPRVMP) which will behas

9 <u>been</u> implemented to confirm that the annual average concentration of volatile organic

compounds (**VOCs**) in the air emissions from the underground HWDUs do not exceed the VOC

action levels (10⁻⁵ for carcinogens and <u>HIhazard index</u> >1 for non-carcinogens) listed in Permit

Part 4, Section 4.6.2.3. The VOCMP_<u>RVMP</u> is provided in Attachment N. The VOCMP_<u>RVMP</u>
 includes monitoring design, sampling and analysis procedures and guality assurance objectives.

includes monitoring design, sampling and analysis procedures and quality assurance objectives.
 This plan is required to demonstrate compliance with 20.4.1.500 and .900 NMAC (incorporating

¹⁵ 40 CFR §264.602 and §270.23(a)(2)).

The Permittees will operate in accordance with the <u>VOCMP_RVMP</u> until after certification of the closure of the last underground HWDU.

18 The VOCMP uses **EPA** Compendium Method TO-15. The Permittees have had success with

19 TO-15 at the WIPP if care is taken in placing the sampler to avoid high dust and if stringent

20 cleaning requirements are imposed for the clean canisters. This is necessary because of the

- 21 extremely low concentrations that are being monitored.
- 22 The VOCMP <u>RVMP will beis</u> implemented under a Quality Assurance Plan that conforms to the

document entitled "EPA Requirements for Quality Assurance Project Plans for Environmental

Data Operations." Quality Assurance criteria required for the target analytes are presented in

Table N-2 in Permit Attachment N. Definitions of these criteria are given in Permit Attachment N

along with a discussion of other requirements of the Quality Assurance Program, including
 sample handling, calibration, analytical procedures, data reduction, validation and reporting,

performance and system audits, preventive maintenance, and corrective actions.

29 H-1a Post-Closure Plan after Final Facility Closure

³⁰ A number of regulations deal with the period of time that begins once the WIPP <u>facility</u> has

undergone final facility closure and decommissioning. Under 40 CFR Part 191, the period

consists of an active control period and a passive control period; only 100 years of the active

control period can be used in performance assessment. The Land Withdrawal Act (LWA) of

1992 requires that the U.S. Department of Energy (**DOE**) prepare and submit a post-

35 decommissioning land management plan. <u>The New Mexico hazardous waste regulations at</u>

20.4.1.500 NMAC (incorporating 40 CFR §264.117) requires requires post-closure care,

including monitoring, security, and control of property use. Because of the numerous

- regulations, the Permittees have prepared a single strategy for post-closure management of the
- ³⁹ WIPP<u>site</u>. This strategy consists of three elements: 1) active controls, 2) monitoring, and 3)
- 40 passive controls. Only the first and second elements occur within the post-closure period
- 41 covered by this permit.

1 <u>H-1a(1) Active Institutional Controls</u>

Once a facility is decommissioned, positive actions (referred to as "active institutional controls")
will be taken to assure proper maintenance and monitoring. The EPA, in 40 CFR §191.14(a)
has specified that active controls will be maintained for as long as practicable and that no more
than 100 years of active institutional control can be assumed in predictions of long-term
performance. This assumption assures that future protection and control does not rely on
positive actions by future generations.

The Permittees' active institutional control program has a primary objective of addressing all applicable requirements, including restoring the WIPP site as nearly as possible to its original condition, and thereby equalizing any preference over other areas for development by humans in the future. Restoration of the WIPP site includes any necessary remedial actions or cleanup of releases resulting from decommissioning. In addition, as part of the active institutional control program implemented under 40 CFR §194.14(a), the Permittees will implement monitoring systems suitable for assessing disposal system performance if such monitoring is feasible.

The Permittees will implement the active institutional control program as described in more detail below:

17 Identification of Active Institutional Control Measures

A detailed explanation of the active institutional controls selected by the Permittees as part of 18 this first step is provided in Permit Attachment H1 (WIPP Active Institutional Controls). This is 19 the Permittees' reference design for active institutional controls. The reference design will be 20 reviewed periodically and updated by the Permittees as appropriate during WIPP disposal 21 operations. The ongoing review and evaluation ensure that the active institutional controls 22 implemented are appropriate for the conditions that may exist at that time. The Permittees will 23 review the reference design prior to implementation and all affected regulatory agencies will be 24 consulted as part of this review. If updating the reference design proposes any changes in the 25 Post-Closure Plan as described in this permit, the Permittees shall apply for a permit 26 modification to include those changes, or submit the reference design and revised Post-Closure 27 Plan as part of a routine permit renewal application, as required by 20.4.1.500 NMAC 28 (incorporating 40 CFR §264.118(d)). 29

As part of the active institutional controls program, the Permittees have developed a set of active institutional controls which will be implemented. These are as follows:

- A fence line shall be established to control access to the repository's footprint area (the waste disposal area projected to the surface). A standard wire fence shall be erected along the perimeter of the repository surface footprint. The fence shall have gates placed approximately midway along each of the four sides.
- An unpaved roadway along the perimeter of the barbed wire fence shall be constructed to provide ready vehicle access to any point around the fenced perimeter, to facilitate inspection and maintenance of the fence line, and to permit visual observation of the repository footprint to the extent permitted by the lay of the land. This roadway shall connect to the paved south access road.

- To ensure visual notification, the fence line shall be posted with signs having as a
 minimum, a legend reading "Danger—Unauthorized Personnel Keep Out" and a warning
 against entering the area without specific permission of the Permittees.
- Contractual arrangements shall be developed to ensure that periodic inspection and necessary corrective maintenance is conducted on the fence line, its associated warning signs, and the roadway. The Permittees will maintain control over all contractual work and will maintain, in the operating record, the results of all inspections and maintenance activities.
- Through direct Permittee staffing support and/or contractual arrangements, procedures
 shall be established to provide routine periodic patrols and surveillances of the protected
 area by personnel trained in security surveillance and investigation.
- Mitigating actions will be taken to address any abnormal conditions¹ identified during
 periodic surveillance and inspections.
- Reports of activities associated with the post-disposal active access controls shall be
 prepared in accordance with regulatory requirements for submittal to the appropriate
 regulatory and legislative authority.
- 17 Details on meeting these criteria are found in Permit Attachment H1.
- 18 Preparation of a Post-Decommissioning Land Management Plan

Section 13(b) of the LWA requires the DOE to prepare and submit a plan for managing the land 19 withdrawal area after decommissioning the WIPP facility. This plan will include a description of 20 both the active and passive institutional controls that will be imposed after decommissioning is 21 complete. This plan will be prepared in consultation with the Department of Interior and the state 22 of New Mexico. If the land management plan proposes any changes in the Post-Closure Plan as 23 described in this permit, the Permittees shall apply for a permit modification to include those 24 changes, or submit the land management plan and revised Post-Closure Plan as part of a 25 routine permit renewal application, as required by 20.4.1.500 NMAC (incorporating 40 CFR 26 §264.118(d)). 27

28 Preparation of the Active Institutional Control Plan

- An active institutional control plan will be initiated prior to actual plant closure, and <u>closure and</u></u> will contain all-the information needed to implement the active and passive institutional controls for the WIPP facility. Active institutional control planning will be based on the reference design and will take into account the most current information regarding the facility and its vicinity and will make use of state-of-the-art materials and techniques. This plan will include acceptable <u>radiological</u> decontamination levels <u>pursuant to 10 CFR Part 835</u>, sampling and analysis plans, and QA/QC specifications. If <u>such future planthe Active Institutional Controls Plan</u> contains
- ³⁶ provisions different from those in this Post-Closure Plan or Permit Attachment H1 (Active

¹ "Abnormal conditions" include any natural or human-caused conditions which could affect the integrity of Active <u>active Institutional institutional controls</u> required by the Permit or which could affect compliance of the WIPP <u>facility</u> with applicable RCRA standards.

- 1 Institutional Controls), the Permittees shall submit a request for modification of the Post-Closure
- 2 Plan and the WIPP Permit. The changes must be approved and made part of the revised Permit
- 3 before the changes are implemented, in accordance with 20.4.1.500 NMAC (incorporating 40
- 4 CFR §264.118(d)).

5 Implementation of Active Institutional Control Measures

6 Most of the active institutional control measures, such as long-term site monitoring and site

7 remedial actions, will be implemented simultaneously with facility closure. However, it may be

8 possible to implement some measures earlier. For example, salt disposal may begin prior to

- 9 final plant closure. Reclamation and restoration of unused disturbed surface areas has already
- begun. Guarding and maintenance activities, which are already in place, could evolve into an
- appropriate type of post-closure activity, subject to appropriate modifications of the Permit.

12 H-1a(2) Monitoring

- ¹³ Post-closure groundwater monitoring will involve a continuation of the monitoring plan in Permit
- 14 Attachment L as described in Permit Part 5. The sampling frequency may be changed to a
- 15 frequency of every two years after final facility closure is complete by modification of the Permit
- as approved by the Secretary of the NMED in accordance with 20.4.1.901.B NMAC

17 (incorporating 40 CFR §270.42). In addition, the final target analyte list specified in Permit

- 18 Attachment L may be changed by permit modification based on final TRU mixed waste volume.
- 19 H-2 Notices Required for Disposal Facilities

20 H-2a Post-Closure Certification

Within 60 days of completion of the post-closure care period after final facility closure, the
 Permittees will submit to the Secretary of the NMED, via registered mail, a certification that
 post-closure care was performed in accordance with the specifications of the approved post closure plan. The certification will be signed by the Permittees and by an independent New
 Mexico registered professional engineer. Documentation supporting the independent registered
 engineer's certification and a copy of the certification will be furnished to the Secretary of the
 NMED.

28 H-2b Post-Closure Notices

- Within 60 days after certification of closure of each underground HWDU or final facility closure, the Permittees will submit to the Secretary of the NMED, and to the Eddy County government or other applicable local government agencies, a record of the type, location, and quantity of hazardous wastes disposed of in each underground HWDU as required in 20.4.1.500 NMAC
- 33 (incorporating 40 CFR §264.119).

ATTACHMENT H1

ACTIVE INSTITUTIONAL CONTROLS DURING POST-CLOSURE

ATTACHMENT H1

ACTIVE INSTITUTIONAL CONTROLS DURING POST-CLOSURE

TABLE OF CONTENTS

Introdu	uction		3		
H1.1	Active Institutional Controls				
		Repository Footprint Fencing			
	H1.1.2	Surveillance Monitoring	8		
	H1.1.3	Maintenance and Remedial Actions	9		
		Control and Clean-up of Releases			
	H1.1.5	Groundwater Monitoring	9		
H1.2	Addition	al Post-Closure Activities	9		
H1.3	Quality Assurance9				
Refere	nces		10		

1		LIST OF FIGURES
2	Figure	Title
3 4 5 6 7	Figure H1-2 Figure H1-3	Spatial View of WIPP Surface and Underground Facilities Standard Waste Box and Seven-Pack Configuration Typical Shaft Sealing System Perimeter Fenceline and Roadway
8		ACRONYMS
9 10	CH CFR	contact-handled Code of Federal Regulations
11	DOE	U.S. Department of Energy
12	EPA	U.S. Environmental Protection Agency
13	LWA	Land Withdrawal Act
14 15	NMAC NMED	New Mexico Administrative Code New Mexico Environment Department
16	SWB	standard waste box
17	TRU	transuranic
18	WIPP	Waste Isolation Pilot Plant
19		

ATTACHMENT H1

ACTIVE INSTITUTIONAL CONTROLS DURING POST-CLOSURE

3 Introduction

1

2

4 Under the requirements of 20.4.1.500 <u>New Mexico Administrative Code (NMAC)</u> (incorporating

5 <u>Title 40 of the Code of Federal Regulations (CFR)</u> §264.118(b), the following activities identified

6 as active institutional controls during post-closure are incorporated into the Post-Closure Plan.

7 The post-closure requirements of this permit include 20.4.1.500 NMAC, incorporating:

40 CFR §264.117(a)(1), which requires that

"Post-closure care for each hazardous waste management unit subject to the
 requirements of §264.117 through 264.120 must begin after completion of closure of the
 unit and continue for 30 years after that date..."

- 40 CFR §264.601, which requires that
- "A miscellaneous unit must be...maintained and closed in a manner that will ensure
 protection of human health and the environment..."
- and 40 CFR §264.603, which requires that
- "A miscellaneous unit that is a disposal unit must be maintained in a manner that
 complies with §264.601 during the post-closure care period."

The containment requirements for a disposal system for transuranic (**TRU**) radioactive wastes are defined in Title 40 CFR §191.13 (U.S. Environmental Protection Agency [**EPA**] 1993). 40 CFR §191.14 is titled Assurance Requirements. With regard to the active institutional controls aspects of the Assurance Requirements, 40 CFR §191.14 states the following:

aspects of <u>the Assurance Requirements</u>, 40 GFR §191.14 states the following:

- 22 "To provide the confidence needed for long-term compliance with the
- requirements of §191.13, disposal of spent fuel or high-level or transuranic
- 24 wastes shall be conducted in accordance with the following provisions... (a)
- Active institutional controls over disposal sites should be maintained for as long a
- 26 period of time as is practicable after disposal; however, performance
- assessments that assess isolation of the wastes from the accessible environment
- shall not consider any contribution from active institutional controls for more than
 100 years after disposal... "
- 30 40 CFR §191.12 states the following:

32

33

- 31 "Active institutional controls mean:
 - controlling access to a disposal site by any means other than passive institutional controls,
 - 2) performing maintenance operations or remedial actions at a site,
- 35 3) controlling or cleaning up releases from a site, or

4) monitoring parameters related to disposal system performance."

1

Purpose: This Permit Attachment describes the design of a system that the Permittees will 2 implement for compliance with the requirements of 20.4.1.500 NMAC (incorporating 40 CFR 3 §264.118(b)) and 40 CFR §191.14(a) to control access to the Waste Isolation Pilot Plant (WIPP) 4 disposal site and implement maintenance and remedial actions pertaining to the site access 5 controls. In addition, this Permit Attachment addresses the scheduling process for control of 6 inspection, maintenance, and periodic reporting related to long-term monitoring. Long-term 7 monitoring addresses the monitoring of disposal system performance, as required by 40 CFR 8 §191.14(b), and environmental monitoring, in accordance with this-the Permit and the 9 Consultation and Cooperation Agreement between the U.S. Department of Energy (DOE) and 10 the state of New Mexico. The scheduling process will also address evaluation of testing 11 activities related to the permanent marker system design contained within the passive 12 institutional controls (not required by this permitthe Permit). 13

Implementation of active institutional controls at the WIPP site will commence when final facility 14 closure is achieved, as specified in Permit Part 6 and Permit Attachment G. Implementation of 15 active institutional controls marks the transition from the active life of the facility (which ends 16 upon certification of closure) to the post-closure care period, as specified in 20.4.1.500 NMAC 17 (incorporating 40 CFR §Part 264, Subpart G). The Permittees will continue the imposition of 18 active institutional controls under this Permit until the New Mexico Environment Department 19 (NMED) approves the post-closure certification specified in Permit Part 7 and Permit 20 Attachment H. 21

Decommissioning activities include decontamination and site restoration. The decontamination 22 effort will be completed prior to sealing of the shafts to allow disposal of all-derived waste 23 (radioactive and/or mixed waste derived from TRU/TRU-mixed waste received at the WIPP 24 facility) into the repository. The implementation of active institutional controls upon certification 25 of facility closure will prevent human intrusion into the repository. The Permittees' restoration 26 efforts will return the land disturbed by the WIPP activities to a stable ecological state that will 27 assimilate with the surrounding undisturbed ecosystem. Necessary exceptions to returning the 28 site to its full pre-WIPP condition include measurements associated with long-term monitoring. 29

Scope: The active institutional control requirements include a means of controlling access to 30 the site of the repository's surface footprint (the repository area projected to the surface) and 31 maintenance, including corrective actions, for access control system components. Active control 32 of access to the site will be exercised by the Permittees for the duration of the post-closure care 33 period. Although the Permittees are only required to maintain active institutional controls until 34 approval of the post-closure certification by the NMED, the Permittees will continue active 35 institutional controls for at least 100 years after final facility closure to satisfy other regulatory 36 requirements. Control of access will prevent intrusion into the disposed waste by deep drilling or 37 mining for natural resources. This Permit Attachment also specifies a process for scheduling 38 activities related to the long-term monitoring of the repository. Some of the activities supporting 39 the monitoring programs will be initiated during the active life of the facility to establish 40 databases. These activities are planned to continue beyond closure through the time after 41 removal of the site structures and return of the land disturbed by the WIPP activities to a stable 42 ecological state that will assimilate with the surrounding undisturbed ecosystem. Long-term 43 monitoring requirements will be necessarily integrated with efforts toward returning the land to a 44 stable ecological state. 45

Background: The WIPP facility was sited and designed authorized by Congress as a research 1

- and development facility to demonstrate the safe disposal of radioactive wastes. The wastes are 2
- derived from DOE defense-related activities. Specifically, the mission of the WIPP project 3
- Project is to conduct research, demonstration, and siting studies relevant to the facilitate 4
- permanent disposal of TRU wastes. Most of these wastes will be are contaminated with 5
- hazardous constituents, making them mixed wastes. 6
- The WIPP Land Withdrawal Act (LWA) addresses the disposal phase of the WIPP 7
- projectProject, the period following closure of the site, and the removal of the surface facilities. 8
- The LWA set aside 10,240 acres (4,144 hectares) located in Eddy County, 26 miles (42 9
- kilometers) east of Carlsbad, New Mexico, as the WIPP site. A 277-acre (112-hectare) portion 10
- within the 10,240 acres (4,144 hectares) is bounded by a barbed wire fence. This fenced area 11
- contains the surface facilities and the mined salt piles for the WIPP site facility. Figure M-44H1-1 12
- is a cutaway illustrating the spatial relationship of the surface facilities and the underground 13 14 repository.
- Upon receiptAfter receiving of the necessary certifications and permits from the EPA and the 15
- New Mexico Environment DepartmentNMED, the Permittees will beginbegan disposal of 16
- contact-handled (CH) and remote-handled (RH) TRU and TRU mixed waste in the WIPP facility. 17
- This waste emplacement and disposal phase The Disposal Phase will continue until the 18
- initiation of final facility closure when the Hazardous Waste Disposal UnitsHWDUs have 19
- received the final volume of waste or when the 6.2 million cubic feet (ft³) (175,588 cubic meters 20
- (m³)) of LWA TRU waste volume has been reached, and as long as the Permittees comply with 21
- the requirements of the Permit. At that time, final facility closure will be initiated as described in 22
- Renewal Permit Attachment G. For the purposes of this Permit Attachment, this time period is 23
- assumed to be 25 years. The waste will be shipped from DOE facilities across the country in 24
- specially designed transportation containers certified by the Nuclear Regulatory Commission. 25
- The transportation routes from these facilities to the WIPP facility have been predetermined. 26
- The CH and RH TRU mixed waste will be packaged in 55-gallon (208-liter), 85-gallon (322-liter), 27
- 100-gallon (379-liter) steel drums, standard waste boxes (SWBs), ten drum overpacks 28
- (TDOPs), and/or standard large box 2s (SLB2s). An SWB is a steel container having a free 29
- volume of 66.3 cubic feet (1.88 cubic meters). Figure H1-2 shows the general arrangement of a 30
- seven-pack of drums and an SWB as received in a Contact-Handled Package.approved 31
- containers as listed in Permit Part 3, Section 3.3.1 and described in Permit Attachment A1-RH 32
- TRU mixed waste inside a Remote-Handled Package is contained in one or more of the 33
- allowable containers described in Permit Attachment A1. Some RH TRU mixed waste may 34
- arrive in shielded containers as described in Permit Attachment A1. 35
- Upon receipt and inspection of the waste containers in the waste handling building Waste 36
- Handling Building Container Storage Unit, the containers will be moved into the repository 2,150 37
- feet (655 meters) below the surface. The containers will then be transported to a disposal room. 38
- (See Figure M-44H1-1 for room and panel arrangement.) The initial seven disposal rooms are in 39
- Panel 1. Panel 1 is the first of eight panels planned to be excavated. Special supports and 40
- ground control corrective actions have been implemented in Panel 1 to ensure its stability. Upon 41
- filling an entire panel, that panel will be closed to isolate it from the rest of the repository and the 42
- ventilation system. During the period of time it takes to fill a given panel, an additional panel will 43 be excavated. Sequential excavation of Panels 2 through 8panels will ensure that these
- 44

control maintenance and evaluation with appropriate corrective action will be required to ensure
 that Panels 9 and 10 (ventilation and access drifts in the repository) remain stable.

3 Decontamination of the WIPP facility will commence with a detailed radiation survey of the

4 entire site. Contaminated<u>Radiological contaminated</u> areas and equipment will be evaluated and

5 decontaminated in accordance with applicable requirements consistent with radiological control

6 procedures pursuant to 10 CFR Part 835. Hazardous waste decontamination, if needed, will be

7 conducted in accordance with standard 20.4.1.500 NMAC (incorporating 40 CFR Part 264) or

8 <u>as prescribed by the Permit</u>. Where decontamination efforts identify areas that meet clean

closure standards for permitted container storage units and are below radiological release
 criteriacontrol limits pursuant to 10 CFR Part 835, routine dismantling and salvaging practices

criteriacontrol limits pursuant to 10 CFR Part 835, routine dismantling and salvaging practices
 will determine the disposition of the material or equipment involved. Material and equipment that

do not meet these standards and criteria will be emplaced in the access entries final open

13 disposal area (Panels 9 and/or 10). Upon completion of emplacement of the contaminated

facility material, the entries will be closed<u>closed</u>, and the repository shafts will be sealed. Final

¹⁵ repository <u>facility</u> closure includes sealing the shafts leading to the repository. Figure <u>M-63</u>H1-3

¹⁶ illustrates the shaft sealing arrangement. Certification of closure will end disposal operations

and initiate the post-closure care period for implementation of active institutional controls.

18 H1.1 Active Institutional Controls

20

21

22

- 19 Active institutional controls during post-closure consist of three elements:
 - controlling access to a disposal site,
 - performing maintenance operations or remedial actions at a site, and
 - controlling or cleaning up releases from a site.

The LWA has removed the WIPP site from public use as a site for mining and other types of 23 mineral resource extraction. Since any type of exploration activity would require authorization, 24 the issuance of approval to intrude upon the repository is precluded by the LWA. The existence 25 of the LWA as law permits meeting the requirements of the first element above by implementing 26 low technology barriers. These barriers include a posted fence and active surveillance at a 27 frequency that denies sufficient time for an individual or organization to intrude into the 28 repository undetected using today's drilling technology. Maintenance and remedial actions at 29 the WIPP site will be conducted by the Permittees at the time of implementing the access 30 controls for the site. The control or cleanup of releases from the site will be conducted as part of 31 the operational program prior to sealing of the shafts. This is necessary to ensure that all 32 derived waste is disposed of within the repository prior to shaft sealing. 33

The Permittees shall maintain the access controls. This requirement includes the maintenance and corrective actions necessary to ensure that the fence and patrol requirements (surveillance) are met. The active institutional controls to be implemented by the Permittees after final closure are the following:

 A fence line will be established to control access to the repository footprint area on the surface. A standard four-strand (three barbed and one unbarbed, in accordance with the Bureau of Land Management specifications) wire fence will be erected along the perimeter of the repository surface footprint. To provide access to the repository footprint during construction of the berm (which may be built in multiple sections simultaneously), 1the fence will have gates placed approximately midway along each of the four sides.2these-These gates will remain locked with access controlled by the Permittees. The3western gate will be 20 feet (6 meters) wide. The remaining three gates will each be 164feet (4.9 meters) wide. Additional fencing will be constructed where appropriate for5remote locations that are used for disposal system monitoring. Such fences will meet the6same construction specifications as the repository footprint perimeter fence.

- 2. Unpaved roadways 16 feet (4.9 meters) wide will be established along the perimeter of 7 the barbed wire fence as well as along the WIPP site boundary. These roadways will be 8 constructed so as to provide ready vehicle access to any point around the fenced 9 perimeter and the site boundary. These roadways will facilitate inspection and 10 maintenance of the fenceline and will allow visual observation of the repository footprint 11 and the site boundary to the extent permitted by the lay of the land. These roadways will 12 connect to the paved south access road. Roads to remote sites will also be constructed 13 and maintained where appropriate. 14
- 3. The fence line will be posted with signs having, as a minimum, a legend reading 15 "Danger—Unauthorized Personnel Keep Out" (20.4.1.500 NMAC (incorporating 40 CFR 16 §264.14[c])) and warning against entering the area without specific permission of the 17 Permittees. The legend must be written in English and Spanish. The signs must be 18 legible from a distance of at least 25 feet (7.6 meters). The size of the visual warning 19 and the spacing of the warning signs will be sufficiently large and close to ensure that 20 one or more of the signs can be seen from any approach prior to an individual actually 21 making contact with the fence line. In no case will the spacing be greater than 300 feet 22 (91.5 meters). 23
- The Permittees will ensure that periodic inspection and expedited corrective
 maintenance are conducted on the fence line, its associated warning signs, and
 roadways.
- The Permittees will provide for routine periodic patrols and surveillance of all-areas
 controlled by or under the authority of the Permittees by personnel trained in security
 surveillance and investigation.
- 6. The Permittees will implement the periodic monitoring requirements of the long-term
 monitoring system.
- The Permittees will submit a Permit modification request for any proposed modifications to the active institutional controls appropriate for access control, as specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.42).
- The Permittees will immediately take appropriate action to address abnormal conditions identified during periodic surveillance and inspections. Abnormal conditions include any natural or human-caused conditions which would affect the integrity of the active institutional controls.
- 9. Reports addressing activities associated with the performance of the active access
 controls after final closure will be prepared periodically according to applicable
 requirements by the Permittees for submittal to the appropriate regulatory and legislative
 authorities.

1 H1.1.1 Repository Footprint Fencing

2 Access to an area approximately 2,780 feet by 2,360 feet (875 meters by 720 meters) will be

3 controlled by a four-strand barbed wire fence. A single gate will be included along each side of

the fence for access. These gates will remain locked with access controlled by the Permittees.

5 Around the perimeter of the fence, an unpaved roadway 16 feet (4.9 meters) wide will be cut to

- allow for patrolling of the perimeter. Figure M-64H1-4 is an illustration of the fence line in
- relation to the repository footprint. Patrolling of the perimeter is based upon the need to ensure
 that no mining or well drilling activity is initiated that could threaten the integrity of the repository.

Fencing off an area larger than the disposal area footprint would not significantly reduce the risk 9 of intrusion but would interfere with cattle grazing-established prior to the LWA. The LWA states 10 that the Secretary of Energy can allow grazing to continue where it was established prior to 11 enactment of the LWA. Based upon current drilling technologies, discussions with local well 12 drilling organizations, and observation of well drilling activities in the WIPP vicinity, it typically 13 requires at least two to three days for a driller to set up a deep drilling rig and commence actual 14 drilling operations. Attaining the 2,150-foot (655-meter) depth that would approach the 15 repository horizon takes at least another week to 10 days. Based upon current drilling practices, 16 patrolling the fenced area two to three times weekly would identify any potential drilling activity 17

well before any breach of the repository could occur. Therefore, the perimeter fence will be
 patrolled three times weekly after final closure.

Construction of access control systems using higher technology than described is not required.
 Likewise, continuous surveillance whether human or electronic is not required.

22 H1.1.2 Surveillance Monitoring

The Permittees will conduct periodic surveillance of the site and the repository footprint during the post-closure period. Unpaved roadways around the WIPP site boundary and around the repository footprint will facilitate such surveillance. Contractual arrangements with a local organization such as the Eddy County Sheriff's Department may be established which would provide some distinct advantages. Among the advantages are the following:

- deputies are trained in patrol and surveillance activities,
- deputies are authorized to arrest members of the general public who are found to be violating trespassing laws,
- the liability associated with apprehension, attempted apprehension, or circumstances arising from attempts would remain with the Sheriff's Department, and
- the general area to be patrolled is already a part of the Sheriff's area of responsibility.

Surveillance will consist of drive-by patrolling around the fenced perimeter a minimum of three two_times per week (weather and road conditions permitting). In the course of the patrol, particular note will be taken of the fence and sign integrity. In addition, the locked condition of each gate will be checked to ensure that gate integrity is maintained and there is no evidence of tampering. Surveillance will also include visual observation of the entire enclosed area for any signs of human activity. Additionally, surveillance patrols will be conducted around the site boundary's perimeter for signs of unauthorized human activities. A routine summary of each 1 month's surveillance activity will be prepared documenting the date and time of each patrol and

2 any unusual circumstances that may have been observed. This surveillance routine will

3 continue throughout the post-closure care period.

4 H1.1.3 Maintenance and Remedial Actions

5 Anticipated maintenance and remedial action issues during the post-closure care period are 6 minimal and should encompass such issues as

- 7 fence and road maintenance,
- repair of any damage that occurs,
- response to evidence of potential erection of drilling equipment, and
- response to unauthorized entry into prohibited areas.

11 The Permittees will provide maintenance services within a reasonable time after the need is

identified during routine patrolling activity. Any observed vandalism or unauthorized entry will be
 investigatedinvestigated, and action will be taken as the circumstances warrant.

14 H1.1.4 Control and Clean-up of Releases

The decontamination process and disposal of the derived waste will be completed prior to sealing the shafts and final facility closure. With the location of the WIPP repository at 2,150 feet (655 meters) below the surface and with panels closed and shafts sealed, the potential for releases of radioactive material or hazardous constituents following the sealing of the shafts is precluded. There will be no credible pathway for releases from the repository other than human intrusion. Routine patrols in accordance with access control requirements will preclude human intrusion into the repository during the post-closure period.

22 H1.1.5 Groundwater Monitoring

23 Groundwater monitoring is the only monitoring program required by the Permit that will be

conducted throughout the post-closure care period. The post-closure groundwater monitoring
 requirements are specified in Permit Part 7 and Permit Attachment L.

26 H1.2 Additional Post-Closure Activities

With the certification of closure of <u>the WIPP facility</u> and return of the land disturbed by the WIPP
 activities to a stable ecological state that will assimilate with the surrounding undisturbed
 ecosystem, continuous occupancy of the site for operational and security purposes will cease.
 Any additional activities will be imposed through the Post-Closure Care Permit issued by <u>the</u>
 NMED after certification of closure.

32 H1.3 Quality Assurance

The quality assurance and quality control plan will be applied to the procurement of materials for and the erection of the fencelines enclosing the repository footprint. In particular, quality control inspection of the placement and tensioning of the barbed wire and chain link fabric will be applied and utilized to provide reasonable assurance that the fencing structures will function

³⁷ during the post-closure care period with normal maintenance.

- 1 Quality assurance and quality control will also be applied to the sampling and analyses
- 2 supporting the environmental monitoring program. Contractors collecting samples and
- 3 laboratories conducting analyses for the Permittees shall be qualified in accordance with
- 4 guidelines prescribed in the most current edition of the Permittees' quality assurance program
- 5 document at the time that the contracts are awarded.

6 References

- 7 EPA (U.S. Environmental Protection Agency). 1993. 40 CFR Part 191 Environmental Radiation
- 8 Protection Standards for the Management and Disposal of Spent Nuclear Fuel, High-Level and
- 9 Transuranic Radioactive Waste; Final Rule. Federal Register, Vol. 58, No. 242, pp. 66398-
- 10 66416, December 20, 1993. Office of Radiation and Indoor Air, Washington, D.C.
- U.S. Congress. 1992. Waste Isolation Pilot Plant Land Withdrawal Act<u>as amended</u>. Public Law
 102-579, 106 Stat. 4777, October 1992. 102nd Congress, Washington, D.C.

FIGURES

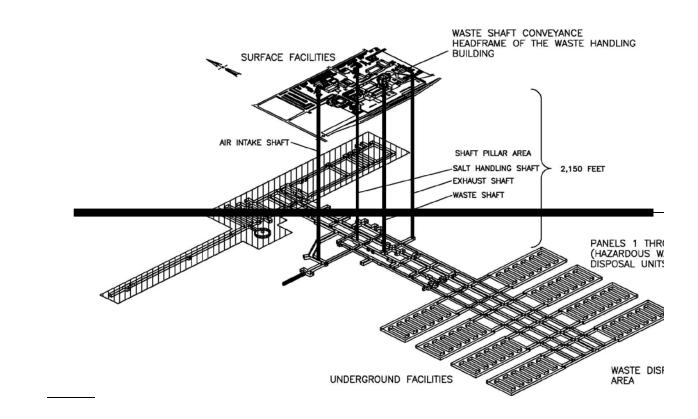


Figure H1-1 Spatial View of WIPP Surface and Underground Facilities

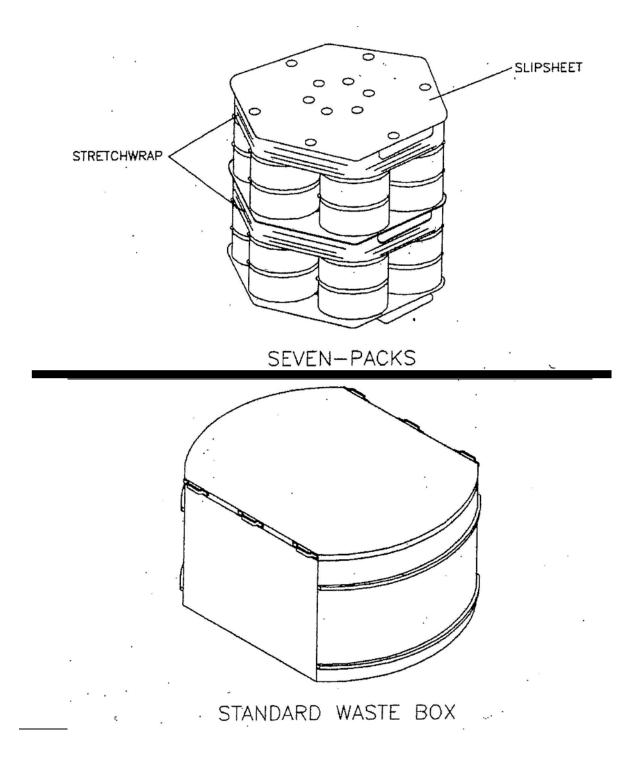
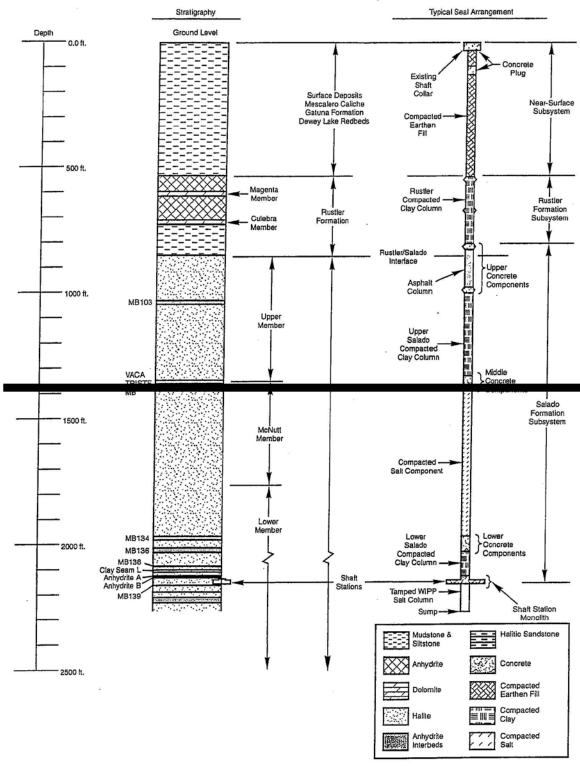


Figure H1-2 Standard Waste Box and Seven-Pack Configuration



CCA-AIC306-0

Figure H1-3 Typical Shaft Sealing System

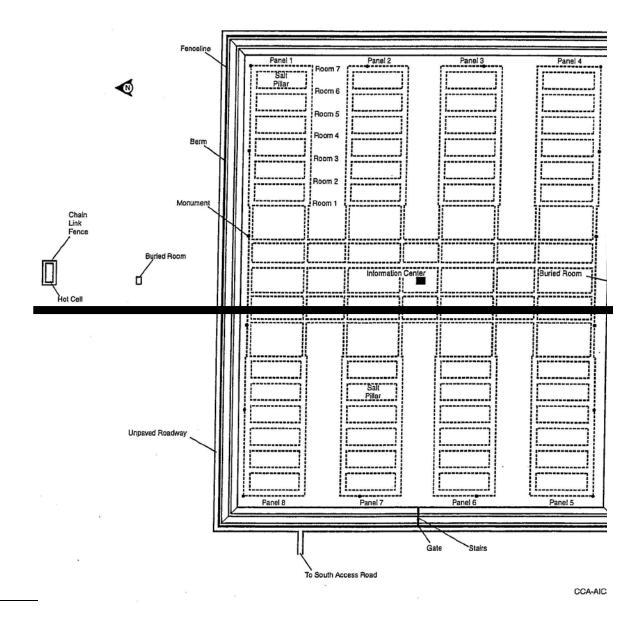


Figure H1-4 Perimeter Fenceline and Roadway

ATTACHMENT I

(RESERVED FOR PERMIT ATTACHMENT I, COMPLIANCE SCHEDULE)

ATTACHMENT J

(RESERVED FOR PERMIT ATTACHMENT J, HAZARDOUS WASTE MANAGEMENT UNIT TABLES)

ATTACHMENT K

(RESERVED FOR PERMIT ATTACHMENT K, SOLID WASTE MANAGEMENT UNIT (SWMU) AND AREA OF CONCERN (AOC) TABLES) ATTACHMENT L

WIPP GROUNDWATER DETECTION MONITORING PROGRAM PLAN

ATTACHMENT L

WIPP GROUNDWATER DETECTION MONITORING PROGRAM PLAN

TABLE OF CONTENTS

L-1	Introd	uction			6
	L-1a	Geologic	and Hydrologi	c Characteristics	7
		L-1a(1)	Geology		7
		L-1a(2)	Groundwate	r Hydrology	8
			L-1a(2)(i)	The Castile	8
			L-1a(2)(ii)	The Salado	
			L-1a(2)(iii)	The Rustler	9
L-2	Gener	ral Regulato	ory Requireme	ents	13
L-3	WIPP	Detection I	Monitoring Pro	ogram—Overview	14
	L-3a	Scope			14
	L-3b	Current W	/IPP DMP		14
		L-3b(1)	Detection Me	onitoring Well Construction Specification	15
L-4	Monite	oring Progra	am Descriptio	n	15
	L-4a	Monitoring	g Frequency		15
	L-4b	Analytical	Parameters a	and Hazardous Constituents	15
	L-4c			levation Measurement, Sample Collection and	
		L-4c(1)		r Surface Elevation Monitoring Methodology	
			L-4c(1)(i)	Field Methods and Data Collection Requirements	s 17
			L-4c(1)(ii)	Groundwater Surface Elevation Records and	
				Document Control	
		L-4c(2)		r Sampling	
			L-4c(2)(i)	Groundwater Pumping and Sampling Systems	
			L-4c(2)(ii)	Field Parameter Analysis	
			L-4c(2)(iii)	Final Samples	20
			L-4c(2)(iv)	Sample Preservation, Tracking, Packaging, and	01
			L 4o(2)(v)	Transportation Sample Documentation and Custody	
		1 4 o(2)	L-4c(2)(v)		
	L-4d	L-4c(3)		Analysis	
	L-4u	L-4d(1)		d Groundwater Elevation Monitoring Equipment	25
		L-40(1)			23
		L-4d(2)		r Surface Elevation Monitoring Equipment Calibrat	
		L-+u(<i>L</i>)		ts	
	L-4e	Statistical		aboratory Analytical Data	
		L-4e(1)		d Spatial Analysis	
		L-4e(2)		and Descriptive Statistics	
		L-4e(3)		S	
		L-4e(4)		s and Reporting	
L-5	Repor	tina			25
	L-5a			S	

	L-5b	Statistical A	Analysis and I	Reporting of Results	25
	L-5c	Semi-Annu	al Groundwat	ter Surface Elevation Report and Annual Culebra	1
		Groundwat	er Report		26
L-6	Recor	ds Managem	nent		27
L-7	Qualit	y Assurance	Requirement	S	27
	L-7a	Data Qualit	y Objectives	and Quality Assurance Objectives	28
		L-7a(1)	Data Quality	Objectives	28
			L-7a(1)(i)	Detection Monitoring Program	28
			L-7a(1)(ii)	Water Level Monitoring Program	28
		L-7a(2)	Quality Assur	ance Objectives	28
			L-7a(2)(i)	Accuracy	28
			L-7a(2)(ii)	Precision	
			L-7a(2)(ii)(A)	Precision Objectives for Field Measurements	29
			L-7a(2)(iii)	Contamination	
			L-7a(2)(iv)	Completeness	
			L-7a(2)(v)	Representativeness	30
			L-7a(2)(vi)	Comparability	31
	L-7b				
	L-7c	Instructions	s, Procedures	, and Drawings	31
	L-7d	Document	Control		31
	L-7e			nce	
	L-7f	Control of N	Monitoring an	d Data Collection Equipment	31
	L-7g	Control of N	Nonconformin	g Conditions	32
	L-7h	Corrective /	Action		32
	L-7i	Quality Ass	surance Reco	rds	32
L-8	References			32	

1		LIST OF TABLES
2	Table	Title
3 4 5	Table L-1 Table L-2	Hydrological Parameters for Rock Units above the Salado at <u>the WIPP Site</u> WIPP Groundwater Detection Monitoring Program Sample Collection and Groundwater Surface Elevation Measurement Frequency
6 7 8	Table L-3 Table L-4 Table L-5	Standard Operating Procedures Applicable to the DMP List of Culebra Wells in the WLMP, Current as of January 2020 Details of Construction for the Six Culebra Detection Monitoring Wells
8 9	Table L-6	Analytical Parameter and Sample Requirements
10		
11		LIST OF FIGURES
12	Figure	Title
13	Figure L-1	General Location of the WIPP Facility
14 15	Figure L-2	WIPP Facility Boundaries Showing 16-Square-Mile Land Withdrawal Boundary
16	Figure L-3	-Site Geologic Column
17 18	Figure L-4	Generalized Stratigraphic Cross Section above Bell Canyon Formation at WIPP Site
19	Figure L-5	Culebra Freshwater-Head Potentiometric Surface
20	Figure L-6	- Detection Monitoring Well Locations
21	Figure L-7	As-Built Configuration of Well WQSP-1
22 23	Figure L-8 Figure L-9	As-Built Configuration of Well WQSP-2 As-Built Configuration of Well WQSP-3
23 24	Figure L-10	As-Built Configuration of Well WQSP-4
25	Figure L-11	As-Built Configuration of Well WQSP-5
26	Figure L-12	As-Built Configuration of Well WQSP-6
27	Figure L-13	Example Chain-of-Custody Record
28	Figure L-14	Groundwater Level Surveillance Wells (insert represents the groundwater
29	-	surveillance wells in WIPP Land Withdrawal Area)

LIST OF ABBREVIATIONS/ACRONYMS/UNITS

2 3	Bell Canyon bgs	Bell Canyon Formation below ground surface
4 5 7 8 9	Castile cm Culebra CofC/RFA °C %C	Castile Formation centimeter(s) Culebra Member of the Rustler Formation chain of custody/request for analysis degree(s) Celsius percent completeness
10	Dewey Lake	Dewey Lake Redbeds Formation
11	DI	deionized
12	DMP	Detection Monitoring Program
13	DMW	Detection Monitoring Well
14	DOE	U.S. Department of Energy
15	DQO	data quality objectives
16	EPA	U.S. Environmental Protection Agency
17	ft	foot (feet)
18	ft ²	square foot (square feet)
19	<u>ft²/d</u>	<u>square feet per day</u>
20	g/cm³	gram(s) per cubic centimeter
21	HWDU	hazardous waste disposal unit(s)
22	km	kilometer(s)
23	km²	square kilometer(s)
23	km ²	square kilometer(s)
24	L	<u>liter(s)</u>
25	Ib/in. ²	pound(s) per square inch
26	LCS	laboratory control samples
27	LCSD	lab control sample duplicate
28	Los Medaños	Los Medaños Member of the Rustler Formation

1	<u>m²/s</u>	<u>square meters per second</u>
2	mV	millivolt(s)
3	NIST	National Institute for Standards and Technology
4	NMAC	New Mexico Administrative Code
5	NMED	New Mexico Environment Department
6	QA	Quality <u>quality</u> Assurance <u>assurance</u>
7	QA/QC	quality assurance/quality control
8	QAO	Quality Assurance Objective
9	QC	quality control
10	PABC	Performance Assessment Baseline Calculation
11	RCRA	Resource Conservation and Recovery Act
12	RPD	relative percent difference
13	Rustler	Rustler Formation
14	%R	percent recovery
15	Salado	Salado Formation
16	SAP	Sampling and Analysis Plans
17	SC	specific conductance
18	SOP	Standard- <u>standard Operating operating Procedureprocedure</u>
19	TDS	total dissolved solids
20	TOC	total organic carbon
21	TRU	transuranic
22	TSDF	treatment, storage, and disposal facilities
23	UTLV	upper tolerance limit value
24	VOC	volatile organic compound
25	WIPP	Waste Isolation Pilot Plant
26	WLMP	WIPP Groundwater Level Monitoring Program
27	μg/L	microgram(s) per liter
28	μm	micrometers

ATTACHMENT L

2 WIPP GROUNDWATER DETECTION MONITORING PROGRAM PLAN

3 L-1 Introduction

1

The Waste Isolation Pilot Plant (**WIPP**) facility is subject to regulation under Title 20 of the New Mexico Administrative Code (**NMAC**), Chapter 4, Part 1, Subpart V (20.4.1.500 NMAC). As required by 20.4.<u>1.</u>500 NMAC (incorporating 40 CFR §264.601), the Permittees shall demonstrate that the environmental performance standards for a miscellaneous unit, which are applied to the hazardous waste disposal units (**HWDUs**) in the underground, will be met.

The WIPP facility is located in Eddy County in southeastern New Mexico (Figure <u>M-56L-1</u>),
 within the Pecos Valley section of the southern Great Plains physiographic province. The
 facility is 26 miles (mi) (42 kilometers [km]) east of Carlsbad, New Mexico, in an area known
 as Los Medaños (the dunes). Los Medaños is a relatively flat, sparsely inhabited plateau
 with little water and limited land uses.

The WIPP facility (Figure M-65L-2) consists of 16 sections of \neq federal land in Township 22 15 South, Range 31 East. The 16 sections of *E*federal land were withdrawn from the application 16 of public land laws by the WIPP Land Withdrawal Act (LWA), Public Law 102-579. The 17 WIPP LWA transferred the responsibility for the administration of the 16 sections from the 18 Department of Interior, Bureau of Land Management, to the U.S. Department of Energy 19 20 (DOE). This law specified that mining and drilling for purposes other than support of the WIPP project are prohibited within this 16-16-section area with the exception of Section 31. 21 Oil and gas drilling activities are restricted in Section 31 from the surface down to 6,000 feet. 22

The WIPP facility includes a mined geologic repository for the disposal of transuranic (TRU) 23 mixed waste. The disposal horizon is located 2.150 feet (ft) (655 meters [m]) below the land 24 surface in the bedded salt of the Salado Formation (Salado). At the WIPP facility, water-25 bearing units occur both above and below the disposal horizon. Groundwater monitoring of 26 27 the uppermost aguifer below the facility is not required because the water-bearing unit. which is (the Bell Canyon Formation (Bell Canyon)), is not considered a credible pathway 28 for a release from the repository. This is because the repository horizon and water-bearing 29 sandstones of the Bell Canyon are separated by over 2,000 ft (610 m) of very low-30 permeability evaporite sediments (Amended Renewal Application Addendum L1 (DOE, 31 32 2009)). No natural credible pathway has been established for contaminant transport to water-bearing zones below the repository horizon, as there is no hydrologic communication 33 between the repository and underlying water-bearing zones. The U.S. Environmental 34 Protection Agency (EPA) concluded in 1990 that natural vertical communication does not 35 exist based on review of numerous studies (EPA, 1990). Furthermore, drilling boreholes for 36 groundwater monitoring through the Salado and the Castile Formation (Castile) into the Bell 37 Canyon would compromise the isolation properties of the repository medium. 38 Groundwater monitoring at the WIPP facility focuses on the Culebra Member (Culebra) of 39

the Rustler Formation (**Rustler**) because it represents the most significant hydrologic
 contaminant migration pathway to the accessible environment. The Culebra is the most

42 significant transmissive water-bearing unit lying above the repository. Groundwater

- 1 movement in the Culebra, using based on results from the basin-scale groundwater model
- is discussed in detail in Amended Renewal Application Addendum L1, Section L1-2a, (DOE,
- з 2009).
- 4 This monitoring plan addresses requirements for sample collection, Culebra groundwater
- 5 surface elevation monitoring, Culebra groundwater flow direction and rate determination,
- 6 data management, and reporting of Culebra groundwater monitoring data. It also identifies
- 7 indicator parameters and hazardous constituents selected to assess Culebra groundwater
- ⁸ quality for the WIPP <u>g</u> roundwater <u>d</u> etection <u>m</u> onitoring <u>p</u> rogram (**DMP**). Because
- 9 quality assurance is an integral component of the groundwater sampling, analysis, and
- reporting process, quality assurance/quality control (**QA/QC**) elements and associated data
- acceptance criteria are included in this plan.
- 12 Procedures are required for each aspect of the Culebra groundwater monitoring and

13 sampling processes, including Culebra groundwater surface elevation measurement,

- 14 Culebra groundwater flow direction and rate determination, sampling equipment installation
- 15 and operation, field water-quality measurements, and sample collection. Instructions for
- performing field activities that will be conducted in conjunction with this DMP are provided in
- the WIPP Standard Operating Procedures (**SOPs**) (see Table L-3), which are maintained in
- facility files and which comply with the applicable requirements of 20.4.1.500 NMAC
- 19 (incorporating 40 CFR § 264.97 (d)). Procedures are required for each aspect of the Culebra
- 20 groundwater sampling process, including Culebra groundwater surface elevation
- 21 measurement, Culebra groundwater flow direction and rate determination, sampling
- 22 equipment installation and operation, field water-quality measurements, and sample
- collection. Data required by this plan will be collected by qualified personnel in accordance
- with SOPs (Table L-3).
- 25 L-1a Geologic and Hydrologic Characteristics
- 26 L-1a(1) Geology

The WIPP facility is situated within the Delaware Basin bounded to the north and east by the Capitan Reef, which is part of the larger Permian Basin, located in <u>western Texas and</u> <u>southeastern New Mexico</u>the south-central region of North America. Three major evaporitebearing formations were deposited in the Delaware Basin (see Figures <u>M-66</u>L-3 and <u>M-67</u>L-4 and Amended Renewal Application Addendum L1, Section L1-1 (DOE, 2009) for more detail):

- The Castile<u>, which</u> consists of interbedded anhydrites and halite. Its upper boundary is at a depth of about 2,825 ft (861 m) below ground surface (**bgs**), and its thickness at the WIPP facility is 1,250 ft (381 m).
- The repository is located in the Salado, which is the host formation of the repository and overlies the Castile and resulted from prolonged desiccation that produced predominantly halite, with some carbonates, anhydrites, and clay seams. Its upper boundary is at a depth of about 850 ft (259 m) bgs, and it is about 2,000 ft (610 m) thick in the repository area.
- The Rustler, Formation-which was deposited in a lagoonal environment during a major freshening of the basin and consists of carbonates, anhydrites, and halites. Its

beds consist of clay and anhydrite and contain small amounts of brine. The Rustler's
 upper boundary is about 500 ft (152 m) bgs, and it ranges up to 350 ft (107 m) in
 thickness in the repository area.

These evaporite-bearing formations lie between two other formations significant to the 4 geology and hydrology of the WIPP facility. The Dewey Lake Redbeds Formation (Dewey 5 Lake) overlying the Rustler is dominated by nonmarine sediments and consists almost 6 entirely of mudstone, claystone, siltstone, and interbedded sandstone (see Amended 7 Renewal Application Addendum L1, Section L1-1c(6) (DOE, 2009)). This formation forms a 8 500-ft- (152-m) thick barrier of fine-grained sediments that retard the downward percolation 9 of water into the evaporite units below. The Bell Canyon is the first water-bearing unit below 10 the repository (see Amended Renewal Application Addendum L1, Section L1-1c(2) (DOE, 11 2009)) and is confined above by the thick evaporite deposits of the Castile. It consists of 12 1,200 ft (366 m) of interbedded sandstone, shale, and siltstone. 13

The Salado was selected to host the WIPP repository for several reasons. First, it is 14 regionally extensive, underlying an area of more than 36,000 square mi (mi²) (93,240 15 square kilometers [km²]). Second, its permeability is extremely low. Third, salt behaves 16 mechanically in a plastic manner under pressure (the lithostatic pressure at the disposal 17 horizon is approximately 2,200 pounds per square inch [Ib/in.²] or 14.9 megapascals [MPa]) 18 and eventually deforms to fill any opening (referred to as creep). Fourth, any fluid remaining 19 in small fractures or openings is saturated with salt, is incapable of further salt dissolution, 20 and has probably remained in place since deposition. Finally, the Salado lies between the 21 Rustler and the Castile (Figure M-67L-4), both of which contain very low-permeability layers 22 that help confine and isolate waste within and keep water outside of the WIPP repository 23 (see Amended Renewal Application Addendum L1, Section L1-1c(5) and L1-1c(3) (DOE, 24 2009)). 25

26 <u>L-1a(2) Groundwater Hydrology</u>

The general hydrogeology of the area surrounding the WIPP facility is described in this section starting with the first geologic unit below the Salado. Addendum L1, Section L1-2a of the Amended Renewal Application (DOE, 2009) provides more detailed discussions of the local and regional hydrogeology. Relevant hydrological parameters for the various rock units, above the Salado at the WIPP facility, are summarized in Table L-1.

32 L-1a(2)(i) The Castile

The Castile is a basin-filling evaporite sequence of sediments surrounded by the Capitan 33 Reef. The Castile represents a major regional groundwater aguitard that effectively prevents 34 upward migration of water from the underlying Bell Canyon. Fluid present in the Castile is 35 very restricted because evaporites do not readily maintain pore space, solution channels, or 36 open fractures at depth. Drill-stem tests conducted in the Castile during construction of the 37 WIPP facility determined its permeability to be lower than detection limits; however, the 38 hydraulic conductivity has been conservatively estimated to be less than 10⁻⁸ ftfeet (ft) per 39 day or $(3.5 \times 10^{-914} \text{ meters per second } (m/s) \text{ per day}$. A description of the Castile brine 40 reservoirs outside the WIPP facility area is provided in Addendum L1, Section L1-2a(2)(b) of 41 the Amended Renewal Application (DOE, 2009). 42

1 L-1a(2)(ii) The Salado

The Salado is an evaporite sequence that filled the remainder of the Delaware Basin and 2 lapped extensively over the Capitan Reef and the back-reef sediments beyond. The Salado 3 consists of approximately 2,000 ft (610 m) of bedded halite, with interbeds or seams of 4 anhydrite, clay, and polyhalite. It acts hydrologically as a regional confining bed. The 5 porosity of the Salado is very low and naturally interconnected pores are probably 6 nonexistent in halite at the depth of the disposal horizon. Fluids associated with the Salado 7 occur mainly as very small fluid inclusions in the halite crystals and also occur between 8 crystal boundaries (interstitial fluid) of the massive crystalline salt formation; fluids also occur 9 in clay seams and anhydrite beds. Permeabilities measured from the surface in the area of 10 the WIPP facility range from 0.01 to 25 microdarcysmicrodarcies (9.9 x 10-21 to 2.5 x 10-12 11 square meters [m²]). The most reliable value, 0.3 microdarcy (3.0 x 10⁻¹⁹ m²), was obtained 12 from well DOE-2. The results of permeability testing at the disposal horizon are within the 13 range of 0.001 to 0.01 microdarcy (9.9 x 10⁻²² to 9.9 x 10⁻²¹ m²). 14

15 L-1a(2)(iii) The Rustler

16 The Rustler has been the subject of extensive characterization activities because it contains

the most transmissive hydrologic units overlying the Salado. Within the Rustler, five

18 members have been identified. Of these, the Culebra is the most transmissive and has been

the focus of most of the Rustler hydrologic studies.

The Culebra is the first continuous water-bearing zone above the Salado and is up to 20 approximately 30 ft (9 m) thick. Water in the Culebra is usually present in fractures and is 21 confined by overlying gypsum or anhydrite and underlying clay and anhydrite beds. The 22 hydraulic gradient within the Culebra in the area of the WIPP facility is approximately 20 ft 23 per mi (3.8 m per km) and becomes much flatter south and southwest of the site (Figure M-24 68L-5). Culebra transmissivities in the Nash Draw range up to 1,250 square ft (ft²) per day 25 (ft²/d) (1.3 x 10^{:3} m² per second (m²/s)116 square m [m²]) per day; closer to the WIPP 26 facility, they are as low as 0.007 to 74 ft²/d (0.000657.5 x 10⁻⁹ to 8.0 x 10⁻⁵7.0 m²/s) per day. 27

The two primary types of field tests that are being used to characterize the flow and transport characteristics of the Culebra are hydraulic tests and tracer tests.

The hydraulic tests consist of pump, injection, and slug testing of wells across the study 30 area (see Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE, 31 2009)). The most detailed hydraulic test data exist for the WIPP hydropads (e.g., H-19). The 32 hydropads generally comprise a network of three or more wells located within a few tens of 33 meters of each other. Long-term pumping tests have been conducted at hydropads H-3, H-34 11, and H-19 and at well WIPP-13 (see Amended Renewal Application Addendum L1, 35 Section L1-2a(3)(a)(ii) (DOE, 2009)). These pumping tests provided transient pressure data 36 both at the hydropad and over a much larger area. Tests often included use of automated 37 data-acquisition systems, providing high-resolution (in both space and time) data sets. In 38 addition to long-term pumping tests, slug tests and short-term pumping tests have been 39 conducted at individual wells to provide pressure data that can be used to interpret the 40 transmissivity at that well (see Amended Renewal Application Addendum L1, Section L1-41 2a(3)(a)(ii) (DOE, 2009)). Detailed cross-hole hydraulic testing has been conducted at the H-42 19 hydropad (see Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) 43 (DOE, 2009)). 44

Pressure data wereare collected during hydraulic tests for estimation of hydrologic 1 2 characteristics such as transmissivity, permeability, and storativity. The pressure data from long-term pumping tests and the interpreted transmissivity values for individual wells 3 wereare used to develop the conceptual model for incorporation intoin calibration of flow 4 models. Some of the hydraulic test data and interpretations are also important for the 5 interpretation of transport characteristics. For instance, the permeability values interpreted 6 from the hydraulic tests at a given hydropad wereare needed for interpretations of tracer test 7 data at that hydropad. 8 There is strong evidence that the permeability of the Culebra varies spatially and varies 9 sufficiently that it cannot be characterized with a uniform value or range over the region of 10 interest tothat affects the WIPP facility. The transmissivity of the Culebra varies spatially 11 over ten orders of magnitude from east to west in the vicinity of the WIPP facility. 12 Transmissivities have been calculated at 1×10^{-7} ft²/dsquare feet per day (1×10^{-13} 13 <u>m²/s</u>square meters per second) at well SNL-15 east of the WIPP site to $1 \times 10^3 \frac{\text{ft}^2/\text{d}}{\text{square}}$ 14 feet per day (1 × 10⁻³ m²/ssquare meters per second) at well H-7 in Nash Draw (see 15 Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE, 2009)). 16 Transmissivity variations in the Culebra are believed to be controlled by the relative 17 abundance of open fractures (secondary porosity) rather than by primary porosity (i.e.that is, 18 depositional) features of the unit (Roberts, 2007). Lateral variations in depositional 19 environments were small within the mapped region, and primary features of the Culebra 20 show little map-scale spatial variability, according to Holt and Powers, 1988. Direct 21 measurements of the density of open fractures are not available from core samples because 22 of incomplete recovery and fracturing during drilling, but observation of the relatively 23 unfractured exposures in the WIPP shafts suggests that the density of open fractures in the 24 Culebra decreases to the east. Holt and Powers (1988) examined available Culebra cores at 25 26 and near the WIPP site and integrated observations with shaft mapping at the site. These cores were not all complete through the Culebra. Culebra thickness varies somewhat in the 27 site area. The Culebra varies vertically, but Holt and Powers (1988) described consistent 28 sedimentary features across the area. The Culebra did not reveal facies changes over the 29 site and surrounding area that indicate changes in depositional environments. 30 Holt (1997) described transport processes through the Culebra, concluding that at the 31 regional scale the Culebra will behave as a double-porosity unit. Fractures were related to 32 depth and dissolution of underlying Salado halite by Holt (Holt and Yarbrough, 2002; Powers 33 et al., 2003). It was also noted by Holt (1997) that halite bounding the Culebra (especially to 34 the east of the WIPP site) was likely to further decrease the porosity of the Culebra. Culebra 35 core from monitor well SNL-15 (Powers et al., 2006) provided evidence of halite filling 36 Culebra porosity where halite beds overlie and underlie the dolomite (Holt and Powers, 37 2010). Gypsum precipitated in porosity in some areas of the Culebra may further decrease 38 porosity (Beauheim and Holt, 1990). The Culebra conceptual model was revised based on 39 the relationship of transmissivity to the three factors of overburden thickness, dissolution of 40 salt from below the Culebra, and the presence of halite below and above the Culebra (Holt 41 et al., 2005). 42

Geochemical and radioisotope characteristics of the Culebra have been studied. There is
 considerable variation in groundwater geochemistry in the Culebra. The variation has been
 described in terms of different hydrogeochemical facies that can be mapped in the Culebra.

1 A halite-rich hydrogeochemical facies exists in the region of the WIPP site and to the east,

- 2 approximately corresponding to the regions in which halite exists in units above and below
- the Culebra, and in which a large portion of the Culebra fractures are gypsum filled. An
- anhydrite-rich hydrogeochemical facies exists west and south of the WIPP site, where there
- 5 is relatively less halite in adjacent strata and where there are fewer gypsum-filled fractures.
- 6 Radiogenic isotopic signatures suggest that the age of the groundwater in the
- 7 Culebra is on the order of 10,000 years or more (see Amended Renewal Application
- 8 Addendum L1 (DOE, 2009)). More recent data indicate Krypton-81 model ages on the order
- 9 of 130,000 years for high-transmissivity zones of the Culebra and 330,000 years for low
- 10 transmissivity zones of the Culebra (Sturchio et al., 2014).
- 11 The radiogenic ages of the Culebra groundwater and the geochemical differences provide
- information potentially relevant to the groundwater flow directions and groundwater
- interaction with other units and are important constraints on conceptual models of
- 14 groundwater flow (see Renewal Application Addendum L1, Section L1-4b (DOE, 2020)).
- ¹⁵ The Permittees have proposed a conceptualization of groundwater flow that explains
- observed geochemical facies and groundwater flow patterns. The conceptualization,
- referred to as the basin-scale groundwater model, offers a three-three-dimensional
- approach to treatment of Supra-Salado rock units, and assumes vertical leakage (albeit very
- 19 slow) between rock units of the Rustler exists (where <u>a</u>hydraulic head is present).
- 20 Flow in the Culebra is considered transient. The model assumes that the groundwater
- 21 system is dynamic and is responding to <u>climate</u>the drying of climate that has
- 22 <u>persisted</u> occurred since the late Pleistocene period. The Permittees assumed that recharge
- rates during the late Pleistocene period were sufficient to maintain the water table near land
- surface, but has since dropped significantly. Therefore, the impact of local topography on
- 25 groundwater flow was greater during wetter periods, with discharge from the Rustler in the
- vicinity of the WIPP facility to the west toward Nash Draw; flow is currently dominated by
- 27 more regional topographic effects during drier times, with flow in the Rustler from the vicinity
- of the WIPP facility towards the Balmorhea-Loving Trough to the south.
- Using data from 22 wells, Siegel<u>et al.</u>, Robinson, and Myers (1991) originally defined four
 hydrochemical <u>zones</u>facies (A, B, C, and D) for Culebra groundwater based primarily on
 ionic strength and major constituents. With the data now available from 59 wells, Domski
 and Beauheim (2008) defined transitional A/C and B/C facies, as well as a new <u>Zone</u>facies
 E for high-moles per kilogram (molal) Na-Mg CI brines. <u>These hydrochemical zones/facies</u>
 include the following:
- Zone B Dilute (ionic strength ≤0.1 molal) CaSO₄-rich groundwater, from southern
 high-transmissivity area. Mg/Ca molar ratio 0.32 to 0.52.
- Zone <u>Facies</u> B/C Ionic strength 0.18 to 0.29 molal, Mg/Ca molar ratio 0.4 to 0.6.
- Zone C Variable composition waters, ionic strength 0.3 to 1.0 molal, Mg/Ca molar ratio 0.4 to 1.1.
- Zone <u>Facies</u> A/C Ionic strength 1.1 to 1.6 molal, Mg/Ca molar ratio 0.5 to 1.2.
- Zone A Ionic strength >1.66 molal, up to 5.3 molal, Mg/Ca molar ratio 1.2 to 2.4.

- Zone D Defined based on inferred contamination related to potash refining operations. Ionic strength 3 molal, K/Na weight ratios of ~0.2.
- 3

1

2

4

• Zone E - Wells east of the mudstone-halite margins, ionic strength 6.4 to 8.6 molal, Mg/Ca molar ratio 4.1 to 6.6.

The low-ionic-strength (≤0.1 molal) <u>Zone</u>facies B waters contain more sulfate than chloride,
and are found southwest and south of the WIPP site within and down the Culebra hydraulic
gradient from the southernmost closed catchment basins, mapped by Powers (2006), in the
southwest arm of Nash Draw. These waters reflect relatively recent recharge through
gypsum karst overlying the Culebra. However, with total dissolved solids (**TDS**)
concentrations in excess of 3,000 mg/L, the <u>Zone</u>facies B waters do not represent modernday precipitation rapidly reaching the Culebra. They must have residence times in the

12 Rustler sulfate units of thousands of years before reaching the Culebra.

13 The higher-ionic-strength (0.3-1 molal) Zonefacies C brines have differing compositions, representing meteoric waters that have dissolved CaSO₄, overprinted with mixing and 14 localized processes. ZoneFacies A brines (ionic strength 1.6 - 5.3 molal) are high in NaCI 15 and are clustered along the extent of halite in the middle of the Tamarisk Member of the 16 Rustler Formation. ZoneFacies A represents old waters (long flow paths) that have 17 dissolved halite and/or connate brine, or a mixture of the two from Zonefacies E. The 18 Zonefacies D brines, as identified by Siegel et al., Robinson, and Myers (1991), are high-19 ionic-strength solutions found in western Nash Draw with high K/Na ratios representing 20 waters contaminated with effluent from potash refining operations. Similar water is found at 21 shallow depth (<36 ft (11 m)) in the upper Dewey Lake at SNL-1, just south of the Intrepid 22 East tailings pile. The newly defined Zonefacies E waters are very high ionic strength (6.4 -23 8.6 molal) NaCl brines with high Mg/Ca ratios. The Zonefacies E brines are found east of 24 the WIPP site, where Rustler halite is present above and below the Culebra, and halite 25 26 cements are present in the Culebra. They represent primitive brines present since deposition of the Culebra and immediately overlying strata. 27

In a previous (earlier) conceptual model, the geochemistry of Culebra groundwater was not
 correlated with flow direction. It was assumed that ZonePreviously, the Permittees and
 others believed the geochemistry of Culebra groundwater was inconsistent with flow
 directions. This was based on the premise that facies C water must transform to Zonefacies

- B water (e.g., become "fresher"), which is inconsistent with the observed flow direction. It is
- now believed that the observed geochemistry and flow directions can be explained with
- different recharge areas and Culebra travel paths (Amended Renewal Application
- Addendum L1 (DOE, 2009) and Renewal Application Addendum L1 (DOE, 2020).

Head distribution in the Culebra (see Amended Renewal Application Addendum L1 (DOE,
 2009) and Renewal Application Addendum L1 (DOE, 2020)) is now consistent with basin scale groundwater basin modeling results indicating that the generalized groundwater flow
 direction in the Culebra is currently north to south. However, the fractured nature of the
 Culebra, coupled with variable fluid densities, can cause localized flow patterns to differ from
 general flow patterns.

Groundwater levels in the Culebra in the region around the WIPP facility have been
 measured in numerous wells. Water-level rises have been observed and are attributed to
 causes discussed in the <u>Amended</u> Renewal Application Addendum L1, Section L1-

2a(3)(a)(ii) (DOE, 2009) and Renewal Application Addendum L1, Section L1-4d (DOE, 1

2020). The extent of changes in water_-levels rise observed at a particular well depends on 2

several factors, but the proximity of the observation point to the cause of the water-level 3

change appears to be a primary factor. Water level decreases have been observed due to 4

athropogenic causes, such as pumping from water wells by a local rancher and well 5

pumping from the oil and gas industry for hydraulic fracking (Thomas et al., 2017). 6

Hydrological investigations conducted from 2003 through 2007 provided new information, 7

some of it confirming long-held assumptions and some offering new insight into the 8

hydrological system around the WIPP site. A Culebra monitoring network optimization study 9

was completed by McKenna (2004) and updated by Kuhlman (2010) to identify locations 10

where new Culebra monitoring wells would be of greatest value and to identify wells that 11

could be removed from the network with little loss of information. 12

As discussed in Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE, 13

2009) and Renewal Application Addendum L1 (DOE, 2020), extensive hydrological testing 14 has been performed in the new wells. This testing has involved both short-term single-well

15

tests, which provide information on local transmissivity and heterogeneity, and long-term (19 16

to 32 days) pumping tests that have created observable responses in wells up to 5.9 mi (9.5 17

km) away. 18

Inferences about vertical flow directions in the Culebra have been made from well data 19

collected by the Permittees. Beauheim (1987) reported flow directions towards the Culebra 20

from both the underlying Los Medaños Member (Los Medaños) of the Rustler and the 21

overlying Magenta Member (Magenta) of the Rustler across the WIPP site, indicating that 22

the Culebra acts as a drain for the units around it. This is consistent with results of basin-23

scale groundwater modeling. 24

Use of water from the Culebra in the WIPP facility area is quite limited because of its varying 25 yields and high salinity. The Culebra is not used for water supply in the immediate WIPP 26

facility vicinity. Its nearest use is approximately 7 mi (11 km) southwest of the WIPP facility, 27

where salinity is low enough to allow its use for livestock watering. 28

L-2 General Regulatory Requirements 29

Because geologic repositories such as the WIPP facility are defined under the Resource 30 Conservation and Recovery Act (RCRA) as land disposal facilities and as miscellaneous 31 units, the groundwater monitoring requirements of 20.4.1.500 NMAC (incorporating 40 CFR 32 §§264.600 through 264.603) shall be addressed. The requirements of 20.4.1.500 NMAC 33 (incorporating 40 CFR §§264.90 through 264.101) apply to miscellaneous unit treatment, 34 storage, and disposal facilities (TSDF) only if groundwater monitoring is needed to satisfy 35 20.4.1.500 NMAC (incorporating 40 CFR §§264.601 through 264.603) environmental 36 performance standards. 37

38 The New Mexico Environment Department (NMED) has concluded that groundwater

monitoring in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §Part 264, Subpart 39

F) at the WIPP facility is necessary to meet the requirements of 20.4.1.500 NMAC 40

(incorporating 40 CFR §§264.601 through 264.603). 41

1 L-3 WIPP Detection Monitoring Program (DMP) Overview

2 <u>L-3a Scope</u>

This DMP plan governs groundwater sampling events conducted to meet the applicable 3 requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart F), and ensures 4 that such data are gathered in accordance with these and other applicable requirements. 5 Analytical results collected during the DMP are compared to the baseline established in this 6 Permit Part 5, Table 5.6, to determine whether or not a release has occurred. 7 There are two separate components of the Groundwater Monitoring Program, the Detection 8 Monitoring Program (DMP) and the Water Level Monitoring Program (WLMP). The first 9 component consists of a network of six Detection Monitoring Wells (DMWs). The DMWs 10 (WQSP 1-6) were constructed to be consistent with the specifications provided in the 11 Groundwater Monitoring Technical Enforcement Guidance Document and constitute the 12 RCRA groundwater monitoring network specified in the DMP (Figure M-69). The DMWs 13 were used to establish background groundwater quality in accordance with 20.4.1.500 14 NMAC (incorporating 40 CFR §§ 264.97 and 264.98-(f)). The second component of the 15 Culebra Groundwater Monitoring Program is the WLMP, which is used to determine the 16 groundwater surface elevation and flow direction. Table L-4 is a list of the wells used in the 17 WLMP. The list of wells is subject to change due to plugging and abandonment and drilling 18

- 19 of new wells.
- 20 <u>L-3b Current WIPP DMP</u>
- 21 Wells WQSP-1, WQSP-2, and WQSP-3 are located directly-upgradient (north) of the WIPP 22 shaft area.
- ²³ WQSP-4, WQSP-5, and WQSP-6 are located downgradient (south) of the WIPP shaft area.

All three Culebra downgradient wells (WQSP-4, <u>5</u>, and <u>6</u>) were sited to be located

- generally in the <u>flow</u> path of contaminants that might be released from the shaft area in the
- 26 Culebra. Well WQSP-4 was also specifically located to monitor the zone of higher
- transmissivity, which may represent <u>a</u> faster flow path away from the WIPP shaft area to the LWA boundary (Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE,
- ²⁹ 2009)).

30 The compliance point is defined in 20.4.1.500 NMAC (incorporating 40 CFR §264.95) as the vertical plane immediately downgradient of the hazardous waste management unit area 31 (i.e., at the downgradient footprint of the WIPP repository). Permit Part 5 specifies the point 32 of compliance as "the vertical surface located at the hydraulically downgradient limit of the 33 Underground HWDUs that extends to the Culebra Member of the Rustler Formation." Wells 34 WQSP-4, 5, and 6 are situated to demonstrate that during the operating life of the facility 35 (including closure), there will be no releases of hazardous waste constituents that may have 36 an adverse effect on human health and the environment due to the migration of waste 37 constituents in the groundwater or subsurface environmentrelease of contaminants to the 38 general public will not occur. 39

Transport modeling suggests that travel times from the Waste Handling Shaft to the LWA
 boundary could be on the order of thousands of years. This assumes conditions where

hazardous constituents migrate from the sealed repository (post closure) to the Culebra via
 the sealed shafts.

Potentiometric surfaces and groundwater flow directions defined for the Culebra prior to large-scale pumping in the WIPP facility area and the excavation of WIPP facility shafts suggests that flow was generally to the south-southeast from the waste disposal and shaft areas (Mercer, 1983; Davies, 1989). Potentiometric surface maps of the Culebra adjusted for density differences show very similar characteristics. <u>Water levels used to determine The</u> wells used for measuring the potentiometric surface of the Culebra are measured monthly and listed in Table L-4.

10 L-3b(1) Detection Monitoring Well Construction Specification

Diagrams of the six DMP wells are shown in Figures <u>M-70L-7</u> through <u>M-75L-12</u>. Detailed descriptions of geology and construction methods <u>aremay be</u> found in DOE (1995).

The six DMP Culebra wells were drilled between September 13 and October 16, 1994. The 13 total depth of each well is shown in Table L-5. The wells were drilled through the Culebra 14 into the Los Medaños as shown in Table L-5. The wells were drilled to the top of the Culebra 15 using compressed air as the drilling fluid and a 9%-in. drill bit. The wells were then cored 16 using a 5¼-in. core bit to cut 4-in. (0.1-m) diameter core to total depth. See Table L-5 for the 17 drilling and coring intervals for each well. After coring, DMP wells were reamed to 97/8 -in. 18 (0.3 m) in diameter to total depth. After reaming, wells were cased from the surface to total 19 depth with 5-in. (0.1-m) (0.28-in. [0.7-centimeter (cm)] wall) blank fiberglass casing with in-20 line 5-in.- (0.1-m) diameter fiberglass 0.02-in. (0.1-cm) slotted screen across the Culebra 21 interval as shown in Table L-5-. The annulus between the borehole wall and the 22 casing/screen is packed from total depth to surface with sand and with 8/16 Brady gravel, 23 followed by sand, bentonite, and cement as indicated in Table L-5. 24

25 L-4 Monitoring Program Description

26 The WIPP DMP has been designed to meet the groundwater monitoring requirements of

27 20.4.1.500 NMAC (incorporating 40 CFR §§264.90 through 264.101). The following sections

- of the monitoring plan specify the components of the DMP.
- 29 L-4a Monitoring Frequency
- 30 Groundwater surface elevations <u>arewill be</u> monitored in each of the six DMWs on a monthly

basis. The groundwater surface elevation in each DMW <u>arewill also be</u> measured prior to

each annual sampling event. The groundwater surface elevation measurements in the

33 WLMP wells <u>arewill</u> also be monitored on a monthly basis when accessible. The

34 characteristics of the DMW (sampling frequency, location) <u>arewill be</u> evaluated <u>for</u>if

significant changes are observed in the groundwater flow direction or gradient.

36 L-4b Analytical Parameters and Hazardous Constituents

³⁷ The parameters listed in <u>Permit</u> Part 5, Table 5.4.a. and hazardous constituents listed in

³⁸ <u>Permit</u> Part 5, Table 5.4.b_{\pm} are measured as part of the DMP.

1 Additional hazardous constituents may be identified through changes to the list of hazardous

2 waste numbers authorized for disposal at the WIPP facility. If hazardous constituents are

- identified, these will be added to Permit Part 5, Table 5.4.b, unless the Permittees provide
- 4 justification for their omission (e.g. hazardous constituent not in 40 CFR §Part 264.

5 Appendix IX), and this omission is approved by <u>the NMED</u>.

6 L-4c Groundwater Surface Elevation Measurement, Sample Collection and Laboratory
 7 Analysis

Groundwater surface elevations will be measured in each DMW prior to groundwater sample
 collection. Groundwater will be extracted using serial and final sampling methods. Serial
 samplesData will be collected until groundwater field indicator parameters stabilize or three
 well bore volumes, whichever occurs first, after which the final sample for complete analysis
 will be collected. Final samples will then be analyzed for the parameters and constituents in
 <u>Permit</u> Part 5, Tables 5.4.a and 5.4.b.

14 L-4c(1) Groundwater Surface Elevation Monitoring Methodology

The WIPP groundwater level monitoring program (WLMP)<u>WLMP</u> activities are conducted in accordance with the WIPP facility SOPs listed in Table L-3.

Groundwater surface elevation measurements will be taken monthly at each of the six 17 DMWs and prior to the annual sampling event. Additionally, groundwater surface elevation 18 measurements will be taken monthly in the other Culebra wells as listed in Table L-4, when 19 accessible. Well locations are shown in Figure M-76L-14. If a cumulative groundwater 20 surface elevation change of more than 2 feet is detected in any DMP well over the course of 21 one year which ,and the change in elevation is not attributable to site tests or natural 22 stabilization of the site hydrologic system, the Permittees will notify the NMED in writing and 23 discuss the origin of the changes in the Annual Culebra Groundwater Report specified in 24 Permit Part 5. Abnormal, unexplained changes in groundwater surface elevation will be 25 evaluated to determine if they indicate changes in site recharge/discharge, which could 26 affect the assumptions regarding DMW placement and constitute new information as 27 specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.41(a)(2)). 28

Groundwater surface elevation monitoring will continue through the post-closure care period 29 specified in Permit Part 7. The Permittees may temporarily increase the frequency of 30 monitoring to effectively document naturally occurring or artificial perturbations that may be 31 imposed on the hydrologic systems at any point in time. This will be conducted in selected 32 key wells by increasing the frequency of the manual groundwater surface elevation 33 measurements or by monitoring water pressures with the aid of electronic pressure 34 transducers and remote data-logging systems. The Permittees will include such additional 35 data in the reports specified in Section L-5c. 36

- 37 Interpretation of groundwater surface elevation measurements and corresponding
- ³⁸ fluctuations over time is complicated at the WIPP facility by spatial variation in fluid density.
- ³⁹ To monitor the hydraulic gradients of the hydrologic flow systems accurately, actual
- 40 groundwater surface elevation measurements will be monitored at the frequencies specified
- in Table L-2, and the Culebra groundwater densities, of the fluids in the wells listed in Table
- ⁴² L-4_± will be <u>calculated</u> measured annually. The fluid density <u>calculated for</u> measured at well

H-19b0 will be used to correct for freshwater head for the other wells on H-19 pad (H-19b2, 1

2 H-19b3, H-19b4, H-19b5, H-19b6, and H-19b7).

Measured Culebra water surface elevation data can be converted to equivalent freshwater 3 4

- head from knowledge of the density of the borehole fluid, using the following formula:-
- 5

 $p = \rho \gamma \psi h$

- where 6
- p = freshwater head (length of freshwater head) 7
- $\gamma \neq$ = average specific gravity of the borehole fluid (unitless ratio of borehole fluid 8
- density to density of fresh water) 9
- $\rho_{\rm P}$ = freshwater density (mass/volume) 10
- h = fluid column height above the datum (length) 11

If the freshwater density is assumed to be 1.000 gram per cubic centimeter (g/cm³), then the 12

equivalent freshwater head is equal to the fluid column height times the average borehole 13 fluid specific gravity. 14

Density <u>calculations</u> measurements are <u>performed</u> made annually. Density for the DMWs 15

will be expressed as specific gravity as measured in the field during sampling events using a 16

hydrometer. Freshwater head for other Culebra wells will be calculated as described above 17

from fluid density measurements obtained using pressure transducers. 18

L-4c(1)(i) Field Methods and Data Collection Requirements 19

To obtain an accurate groundwater surface elevation measurement, a calibrated water-level 20 measuring device will be lowered into a test well and the depth to water recorded from a 21 known reference point. An SOP will be used when making water-level measurements for 22 this program. The SOP will specify the methods to be used in obtaining groundwater-level 23 measurements, and provide general instructions including prerequisites, safety precautions, 24 performance frequency, quality assurance, data management, and records. 25

L-4c(1)(ii) Groundwater Surface Elevation Records and Document Control 26

Incoming-Groundwater surface elevation measurement data will be processed in a manner 27 that ensures data integrity. The data management process for groundwater surface 28 elevation measurements data will begin with completion of the field data sheets. Date, time, 29 tape measurement, unique equipment identification number, calibration due date, initial of 30 the field personnel, and equipment/comments will be recorded on the field data sheets. If, 31 for some unexpected reason, a measurement is not possible (e.g., a test is under way that 32 blocks entry to the well bore), then a notation as to why the measurement was not taken will 33 be recorded in the comment column. Personnel will also use the comment column to report 34 any security observations (i.e.e.g., well lock missing. casing damage). 35

Data recorded on the field data sheets and submitted by field personnel will be subject to 36 applicable SOPs (see Table L-3). These procedures specify the processes for administering 37 and managing such data. The data will be entered onto a computerized work sheet. The 38 work sheet program calculates groundwater surface elevation in both feet and meters 39

relative to the top of the casing and also relative to mean sea level. The work sheet program
 adjusts groundwater surface elevations to equivalent freshwater heads.

A check print will be made of the work sheet printout. The check print will be used to verify 3 that data taken in the field was were properly reported on the database printout. A minimum 4 of 10 percent of the spreadsheet calculations will be randomly verified on the check print to 5 ensure that calculations are being performed correctly. If errors are found, the work sheet 6 will be corrected. Groundwater surface elevation data and equivalent freshwater heads for 7 the Culebra wells in Table L-4 will be transmitted to the NMED by May 31 and November 30. 8 Semi-annual groundwater reports will also include annotated hydrographs and trend 9 analysis. 10

- 11 L-4c(2) Groundwater Sampling
- 12 <u>L-4c(2)(i)</u> Groundwater Pumping and Sampling Systems

The groundwater pumping and sampling systems used to collect a groundwater sample from the six DMWs will provide continuous and adequate production of water so that a representative groundwater sample can be obtained.

The type of pumping and sampling system to be used in a well depends primarily on the
 aquifer characteristics of the Culebra and well construction. The DMWs are individually
 equipped with dedicated submersible pumping assemblies. Each well has a specific type of
 submersible pump₇ matched to the ability of the well to yield water during pumping. The
 down-hole submersible pumps are controlled by a variable electronic flow controller to
 match the production capacity of the formation at each-the well.

As recommended in the "RCRA Ground-Water Monitoring Technical Enforcement Guidance Document" (EPA, 1986) the wells will be purged no more than three well bore volumes or until field <u>indicator</u> parameters have stabilized, whichever comes first. Well purging will <u>be</u> performed in accordance with an SOP in conjunction with <u>serial samplingfield parameter</u> <u>analysis</u> to determine when the groundwater chemistry stabilizes and is therefore representative of undisturbed groundwater.

28 The DMWs are cased and screened through the production interval with materials (fiberglass-reinforced plastic) that do not yield contamination to the aguifer or allow the 29 production interval to collapse under stress (high epoxy fiberglass). An electric, submersible 30 pump installation without the use of a packer is used in this instance. The largest amount of 31 discharge from the submersible pump takes place from a discharge pipe. In addition to this 32 main discharge pipe, a dedicated sample line running parallel to the discharge pipe is used. 33 The sampling line is manufactured from a chemically inert material. Cumulative flow is 34 measured using a totalizing flow meter. Flow from the discharge pipe is routed to a 35 discharge tank for disposal. 36

The dedicated sampling line is used to collect the water sample that will undergo analysis. By using a dedicated sample line, the water will not be contaminated by the metal discharge pipe. The sample line will branch from the main discharge pipe a few inches above the pump. Flow from the sample line will be routed into the sample collection area. Flow through the sample collection line is regulated by a flow-control valve. The sample line is insulated at the surface to minimize temperature fluctuations.

1 L-4c(2)(ii) Serial Samples Field Parameter Analysis

2 Serial sampling<u>Field parameter analysis</u> is the collection measurement of data from

- 3 temperature, specific conductivity, and pH meters installed in a flow-through cell foref
- 4 sequential samples for the purpose of determining when the groundwater chemistry

5 stabilizes and is therefore representative of undisturbed groundwater. The Permittees' SOP

- 6 for serial sampling<u>field parameter analysis</u> will provide criteria for determining when a final
- 7 sample should be taken. Each DMW will be purged to no than more three well bore

8 volumes, or until field parameters stabilize, whichever occurs first. Well stabilization occurs

9 when the field-analyzed parameters are within $\pm 5\%$ offor three consecutive measurements.

A well bore volume is defined as the volume of water from static water level to the bottom of

the well sump. Serial samples will be analyzed in the mobile filed laboratory for field

- ¹² indicator parameters. The Permittees will provide an explanation of why the sample was
- collected when field indicator parameters were not stabilized and place that explanation in
- the WIPP facility Operating Record.

15 Serial samples Field parameters will be collected and analyzed to detect and monitor the

16 chemical variation of the groundwater as a function of the volume of water pumped. Once

17 serial sampling<u>data collection</u> begins, the <u>duration</u>frequency at which <u>field parameters</u>serial

18 samples are collected and analyzed will be left to the discretion of the Permittees, but will be

19 performed a minimum of three times during a sampling round.

- The Permittees will use appropriate field methods to identify stabilization of the following field indicator parameters: pH_temperature_specific conductance (SC) and specific growity
- field indicator parameters: pH, temperature, specific conductance (SC), and specific gravity.

The three field indicator parameters of temperature, specific conductanceSC, and pH will be 22 determined by either an "in-line" technique, using a self-contained flow cell, or an "off-line" 23 technique, in which the samples will be collected from a sample line at atmospheric 24 pressure.-Specific conductance and specific gravity samples will be collected from the 25 sample line at atmospheric pressure. Because of the lack of sophisticated weights and 26 measures equipment available for field density assessments, field density evaluations will 27 be expressed in terms of specific gravity, which is a unitless measure. Density is expressed 28 as unit weight per unit volume. 29

- New polyethylene containers, that are certified clean by the laboratory, will be used to collect the serial<u>final</u> samples from the sample line.
- Serial samples collected in laboratory-certified clean containers do not require rinsing prior to sample collection. Unfiltered groundwater will be used when determining temperature,
- pH, specific conductance, and specific gravity. Sample bottles will be properly identified and
 labeled.
- 36 Samples collected will immediately be analyzed for pH and specific conductance (SC) as
- 37 these parameters are most sensitive to changes in ambient temperature. Temperature, pH,
- and specific conductance, when not measured in a flow cell, will be measured at the

³⁹ approximate time of serial sample collection. These samples will be collected from the

- 40 unfiltered sample line.
- 41 Upon completion of the collection of the last serial sample suite, the serial sample bottles
- 42 accrued throughout the duration of the pumping of the well will be discarded. No serial

- 1 sample bottles will be reused for sampling purposes of any sort. However, serial samples
- 2 may be stored for a period of time depending upon the need. Standard Operating
- 3 Procedures (see Table L-3) defines the protocols for the collection of final and serial
- 4 samples and analysis.

5 <u>L-4c(2)(iii) Final Samples</u>

- 6 The final sample will be collected once the measured field indicator parameters have
- 7 stabilized (refer to Section L-4(c)(2)(ii)). A serial sample<u>Collected data</u> will also be collected
- ⁸ and analyzed for each day of <u>pumping until</u> final sampling. <u>This is</u> to ensure that samples
- 9 collected for laboratory analysis are still representative of stable conditions. Sample
- 10 preservation, handling, and transportation methods will maintain the integrity and
- 11 representativeness of the final samples.
- Prior to collecting the final samples, the collection team shall consider the analyses to be
 performed so that proper shipping or storage containers can be assembled. Table L-6
 presents the sample containers, volumes, and holding times for laboratory samples
 collected as part of the DMP.
- The monitoring system will use dedicated pumping systems and sample collection lines from the sampled formation to the well head.
- Sample integrity will be ensured through appropriate decontamination procedures.
 Laboratory glassware will be washed after each use with a solution of nonphosphorus
- detergent and deionized (**DI**) water and rinsed in **DI** water. Sample containers will be new,
- 21 certified clean containers that will be discarded after one use. Groundwater surface
- elevation measurement devices will be rinsed with fresh water after each use. Non-
- ²³ dedicated sample collection manifold assemblies will be rinsed in accordance with SOPs
- after each use. The exposed ends will be capped off during storage. Prior to the next use of
- the sampling manifold, it will be rinsed a second time with DI water-and a rinsate blank
 sample will be collected to verify cleanliness.
- Water samples will be collected at atmospheric pressure using either the filtered or unfiltered
 sampling lines. Detailed protocols, in the form of SOPs (see Table L-3) define how final
 samples will be collected in a consistent and repeatable fashion for analyses.
- 30 Final samples will be collected in the appropriate type of container for the specific analysis to be performed. The samples will be collected in new and unused glass and plastic 31 containers (refer to Table L-6). For each parameter analyzed, a sufficient volume of sample 32 will be collected to satisfy the volume requirements of the analytical laboratory (as specified 33 by laboratory SOPs). This includes an additional volume of sample water necessary for 34 maintaining quality control standards. All final Final samples will be treated, handled, and 35 preserved as required for the specific type of analysis to be performed. Details about sample 36 containers, preservation, and volumes required for individual types of analyses are found in 37 the applicable SOPs generated, approved, and maintained by the contract analytical 38 laboratory. 39
- Final samples will be sent to the analytical laboratories and analyzed for parameters and
 hazardous constituents specified in <u>Permit</u> Part 5, Tables 5.4 and 5.4 b.

- Duplicates of the final sample will be provided to WIPP Project oversight agencies when requested.
- Wastes resulting from the sampling and field analysis of groundwater are disposed of in
 accordance with the WIPP SOPs (see Table L-3).

5 L-4c(2)(iv) Sample Preservation, Tracking, Packaging, and Transportation

- 6 Many of the chemical constituents measured by the DMP are not chemically stable and
- 7 require preservation and special handling techniques. Samples requiring acidification will be
- 8 treated as requested by the analytical laboratory.
- 9 The analytical laboratory receiving the samples will prescribe the type and amount of
- ¹⁰ preservative, the container material type, the required sample volumes that shall be
- 11 collected, and the shipping requirements. This information will be recorded on the Final
- 12 Sample Checklist for use by field personnel when final samples are being collected. The
- 13 Permittees will follow the EPA, "RCRA Ground-Water Monitoring Technical Enforcement
- Guidance Document," Table 4-1 (EPA, 1986), when laboratory ŠOPs do not specify sample
- 15 container, volume, or preservation requirements. WIPP Waste Isolation Pilot Plant SOPs
- 16 (see Table L-3) provide instructions to ensure proper sample preservation and shipping.
- 17 The sample tracking system at the WIPP facility uses uniquely numbered chain of custody_/
- request for analysis (CofC/RFA) forms. The primary consideration for storage or
- transportation is that samples shall be analyzed within the prescribed holding times for the
- 20 analytes of interest. WIPP SOPs (see Table L-3) provide instructions to ensure proper
- 21 sample tracking protocol.

22 L-4c(2)(v) Sample Documentation and Custody

- To ensure the integrity of samples from the time of collection through reporting date, sample collection, handling, and custody shall be documented. Sample custody and documentation procedures for sampling and analysis activities are detailed in WIPP facility SOPs (see
- 26 Table L-3).
- 27 Standardized forms used to document samples will include sample identification numbers,
- sample labels, custody tape, the sample tracking data, and CofC/RFA form. An example
 form is shown in Figure L-13.

30 Sample Numbers and Labels

- A unique sample identification number will be assigned to each sample sent to the
- ³² laboratory for analysis. The sample identification numbers will be used to track the sample
- from the time of collection through data reporting. Every sample container sent to the
- laboratory for analysis will be identified with a label affixed to it. Sample label information will
- ³⁵ be completed in indelible ink and will contain the following information: sample identification
- number with sample matrix type; sample location; analysis requested; time and date of
- collection; preservative(s), if any; and the sampler's name or initials.

1 Custody Seals

Custody seals <u>or custody tape</u> will be used to detect unauthorized sample tampering from collection through analysis. For example, custody seals that are adhesive-backed strips are destroyed when removed or when the container is opened. The seal will be dated, initialed, and affixed to the sample container in such a manner that it is necessary to break the seal to open the container. Seals will be affixed to sample containers in the field immediately after collection. Upon receipt at the laboratory, the laboratory custodian will inspect the seal for integrity; a broken seal will invalidate the sample.

9 Sample Identification and Tracking

¹⁰ Sample tracking information will be completed for each sample collected. The sample

11 tracking information includes the following information: CofC/RFA form number; date

sample(s) were sent to the lab; laboratory name; acknowledgment of receipt or comments;

13 well name and round number. Sample codes will indicate the well location; the geologic

formation where the water was collected from, the sampling round number; and the sample

- number. The code is broken down as follows:
- 16

 $WQ6^{1}C^{2}R2^{3}N1^{4}$

- ¹⁷ Well identification (e.g., WQSP-6 in this case)
- ² Geologic formation (e.g., the Culebra in this case)
- ¹⁹ ³ Sample round no. (Round 2)
- ⁴ Sample no. (N1)

To distinguish duplicate samples from other samples, a "D" is added as the last digit to signify a duplicate. Sample tracking information will be completed in the field by the

23 sampling team.

Sample tracking is monitored and documented with the CofC/RFA form and the shipping
 airbill. Both of these documents are included in the data packets. Receipt at the analytical
 laboratory may be monitored, if necessary, via the shipper's website tracking application.
 Samples are considered complete when a copy of the original CofC/RFA form is merged
 with the Field₁-Lab copy of the same document.

29 Chain of Custody and Request for Analysis

A CofC/RFA form will be completed during or immediately following sample collection and 30 will accompany the sample through analysis and disposal. The CofC/RFA form will be 31 signed and dated each time the sample custody is transferred. A sample will be considered 32 to be in a person's custody if: the sample is in his/her physical possession; the sample is in 33 his/her unobstructed view; and/or the sample is placed, by the last person in possession of 34 it, in a secured area with restricted access. During shipment, the carrier's air bill number 35 serves as custody verification. Upon receipt of the samples at the analytical laboratory, the 36 laboratory sample custodian acknowledges possession of the samples by signing and 37 dating the CofC/RFA form. The completed original (top page) of the CofC/RFA will be 38 returned to the Permittees with the laboratory analytical report and becomes part of the 39 40 permanent record of the sampling event. The CofC/RFA form also contains specific

instructions to the analytical laboratory for sample analysis, potential hazards, and disposal
 instructions.

3 <u>L-4c(3)</u> Laboratory Analysis

- 4 Analysis of samples will be performed using methods selected to be consistent with EPA
- 5 recommended procedures in SW₂-846 (EPA, <u>2015</u>1996). Additional detail on analytical
- 6 techniques and methods will be given in laboratory SOPs. In Permit Part 5, Tables 5.4.a and
- 7 5.4.b presents the analytical parameters and hazardous constituents for the WIPP DMP.

8 The Permittees will establish the criteria for laboratory selection, including the stipulation

 $_{9}$ that the laboratory follow the procedures specified in SW₂-846 and that the laboratory follow

10 EPA protocols unless alternate methods or protocols are approved by the NMED. The

- analytical laboratory shall demonstrate, through laboratory SOPs that it will follow
- appropriate EPA SW₂-846 requirements and the requirements specified by the EPA

protocols unless alternate methods or protocols are approved by the NMED. The analytical

14 laboratory shall also provide documentation to the Permittees describing the sensitivity of

15 laboratory instrumentation. This documentation will be retained in the WIPP facility

Operating Record. Instrumentation sensitivity needs to be considered because of regulatory

17 requirements governing constituent concentrations in groundwater and the complexity of

brines associated with the Culebra groundwater.

The laboratory will maintain documentation of sample handling and custody, analytical results, and internal quality control (**QC**)<u>QC</u> data. Additionally, the laboratory will analyze QC samples in accordance with this plan and its own internal QC program for indicators of

analytical accuracy and precision. Data generated outside of laboratory acceptance limits

will trigger an evaluation and, if appropriate, corrective action as directed by the Permittees.

The laboratory will report the results of the environmental sample and QC sample analyses

and any necessary corrective actions that were performed. In the event that more than one

26 analytical laboratory is used (e.g., for different analyses), each one will have the

27 responsibilities specified above. A copy of the laboratory SOPs will be maintained in WIPP

facility files. The Permittees will provide <u>the</u> NMED with an initial set of applicable laboratory

- SOPs for information purposes, and provide <u>the NMED</u> with any-updated SOPs on an
 annual basis by January 31upon request.
- Data validation will be performed and reported in the Annual Culebra Groundwater Report and will be maintained in the WIPP facility Operating Record.
- 33 L-4d Calibration
- 34 L-4d(1) Sampling and Groundwater Elevation Monitoring Equipment Calibration

³⁵ The equipment used to collect data for this DMP will be calibrated in accordance with SOPs.

The Permittees will be responsible for calibrating needed equipment on schedule and for maintaining current calibration records for each piece of equipment.

- ³⁸ L-4d(2) Groundwater Surface Elevation Monitoring Equipment Calibration Requirements
- The environment of the telling of telli
- The equipment used in taking groundwater surface elevation measurements will be
- 40 maintained in accordance with WIPP facility SOPs (see Table L-3). The Permittees will be

- 1 responsible for ensuring equipment is calibrated on schedule in accordance with SOPs. The
- 2 Permittees will also be responsible for maintaining copies of records of the most recent
- 3 calibration for each piece of equipment.
- 4 L-4e Statistical Analysis of Laboratory Analytical Data
- 5 Analytical data collected as part of the DMP will be evaluated using appropriate statistical
- 6 techniques. The following specifies the statistical analysis to be performed by the
- 7 Permittees.
- 8 L-4e(1) Temporal and Spatial Analysis
- Temporal and spatial analyses of the data were completed as part of establishing the water quality baseline (Crawley and Nagy, 1998; IT, 2000). As a result, the Permittees determined to evaluate changes relative to baseline on an individual location basis and to report the concentrations of constituents as a time series, either in tabular form or as time plots. No particular seasonal variations have been noted in the concentrations of groundwater samples collected during the spring and autumn; therefore, continuing temporal analysis is not required.

The analytical results for constituents will be reported as time series, either in tabular form or as time plots or both, and compared to the 95th percentile values or reporting limits

- identified in <u>Permit</u> Part 5, Table 5.6.
- 19 <u>L-4e(2)</u> Distributions and Descriptive Statistics

Techniques were established to compare detection monitoring data generated during the 20 baseline studies. A 95th upper tolerance limit value (UTLV) or 95th percentile was determined 21 from those data sets where target analytes were measured at concentrations above the 22 method detection limits. The UTLV is provided for normal or lognormal distributions and a 23 95th percentile confidence interval is provided for data sets that are nonparametric or have 24 25 greater than 15 percent non-detects. For analytes with only a few detects (greater than 95 percent non-detects), an accurate 95th percentile cannot be calculated. For these analytes, 26 the maximum detected concentration is used as the baseline value. For the analytes that 27 are non-detect in all the samples, the method reporting limit was used as the baseline value. 28

29 <u>L-4e(3) Action Levels</u>

Using baseline distributions, actions levels were identified in accordance with methodologies
 described in the baseline documents. Action levels are based on the 95th percentile or
 reporting limits identified in the baseline. If the groundwater concentration of a constituent
 identified in <u>Permit</u> Part 5, Table 5.6_± is found to exceed an action level, a test for outliers is
 performed in accordance with the methodologies specified in "Statistical Analysis of
 Groundwater Monitoring Data at RCRA Facilities" (EPA, 2009).

36 L-4e(4) Comparisons and Reporting

³⁷ Prior to TRU mixed waste receipt, measurements were made of each<u>to establish a</u>

38 background <u>concentration for each groundwater quality hazardous constituent specified in</u>

³⁹ <u>Permit</u> Part 5, Table <u>L-5.4</u>, b, at <u>each DMW</u>every detection monitoring well. <u>These</u>

measurements were made during each of the ten background sampling events (with the 1 exception of trans-1,2-dichloroethylene and vanadium that were added after TRU mixed 2 waste disposal began). These measurements serve as a statistical baseline (Permit Part 5, 3 Table 5.6) that is used for evaluating the significance of the results of subsequent sampling 4 events during detection monitoring. Time-trend control charts with associated screening 5 values for each hazardous constituent are used for this evaluation. The Permittees will 6 7 compare the results from groundwater hazardous constituents of ongoing annual groundwater sample analysis to these baseline values in accordance with 20.4.1.500 NMAC 8 (incorporating 40 CFR §264.97(h)(4)). If the comparisons show that a constituent statistically 9 exceeds the baseline of the DMWs (as defined in 20.4.1.500 NMAC (incorporating 40 CFR 10 §264.98(f)), the well shall be resampled and an analysis performed as soon as possible, in 11 accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(3)). The results of the 12 statistical comparison will be reported annually to the NMED in the Annual Culebra 13 Groundwater Report by November 30, as required under 20.4.1.500 NMAC (incorporating 14 15 40 CFR §264.98(g)).

16 L-5 Reporting

17 L-5a Laboratory Data Reports

Laboratory data will be provided in electronic and hard copy reports to the Permittees and will contain the following information for each analytical report:

- A brief narrative summarizing laboratory analyses performed, date of issue,
 deviations from the analytical method, technical problems affecting data quality,
 laboratory quality checks, corrective actions (if any), and the project manager's
 signature approving issuance of the data report.
- Header information for each analytical data summary sheet including: sample
 number and corresponding laboratory identification number; sample matrix; date of
 collection, receipt, preparation and analysis; and analysi's name.
- Parameter and hazardous constituents, analytical results, reporting units, reporting limit, analytical method used.
- Results of QC sample analyses for all-concurrently analyzed QC samples.
- 30 All analytical<u>Analytical</u> results will be provided to <u>the</u> NMED as specified in the Permit Part 5.
- 31 L-5b Statistical Analysis and Reporting of Results
- 32 Analytical results for hazardous constituents from annual groundwater sampling activities
- 33 will be compared and interpreted by the Permittees through generation of statistical
- analyses as specified in Section L-4e. The Permittees will perform statistical analyses; the
- results will be included in the Annual Culebra Groundwater Report in summary form, and will
- also be provided to <u>the NMED</u> as specified in Permit Part 5.

1	<u>L-5c</u>	Semi-Annual Groundwater Surface Elevation Report and Annual Culebra
2		Groundwater Report

Data collected from this DMP will be reported to <u>the</u> NMED as specified in Permit Part 5 in
 the Annual Culebra Groundwater Report. The report will include all applicable-information
 that may affect the comparison of background groundwater quality and groundwater surface
 elevation data through time. This information will include but is not limited to:

- DMW and WLMP well configuration changes that may have occurred from the time of the last measurement (i.e., plug installation and removal, packer removal and reinstallation, or both; and the type and quantity of fluids that may have been introduced into the test wells).
- Pumping activities that may have taken place since publication of the last annual
 report (i.e., related to groundwater quality sampling, hydraulic testing, and shaft
 installation or grouting) that may have taken place since the last annual groundwater
 report.
- A discussion of the origins of abnormal unexpected changes in the groundwater surface elevation, which <u>areis</u> not attributable to site tests or natural stabilization of the site hydrologic system that exceeds 2 ft in a DMP well over the course of the period covered by the Annual Culebra Groundwater Report (this may indicate changes in recharge/discharge which would affect the assumptions regarding DMP well placement and constitute new information as specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.41(a)(2)).
- The results of the annual measurements of densities.
- Annotated hydrographs.

25

26

27

- Groundwater flow rate and direction.
 - Potentiometric surface map generated using the following steps:
 - ⊕_Examine hydrographs to identify month having the largest number of Culebra water levels available with the fewest wells affected by pumping or other anthropogenic events.
- 29 ⊕__Convert water levels from subject month to equivalent freshwater heads using
 30 fluid densities appropriate to the date.
- \rightarrow ___Fit trend surface through freshwater heads.
- 32 ⊕_Extrapolate the trend surface to the boundaries of the model domain used for the
 33 current Performance Assessment Baseline Calculations (PABCs) and define
 34 initial fixed-head boundary conditions based on the trend surface.
- 35 e___Using the ensemble-average Culebra transmissivity field used for the current
 36 PABC, optimize the model boundary heads to improve the fit of the model to the

1 2	freshwater heads at the wells using optimization software interactively with MODFLOW.
3	→Run MODFLOW with optimal boundary conditions fit.
4	→Contour MODFLOW head results on WIPP site.
5 6	⊖Compute particle path and travel time from the Waste Handling Shaft to the LWA Boundary.
7	⊕Data analysis that will accompany the potentiometric surface map will include:
8	Measured versus modeled scatter plot diagram.
9	Frequency of modeled head residuals.
10	Modeled residual freshwater head at each well.
11 12	 Explanations for modeled misfit residuals greater than 16.4 feet (5 meters).
13 14	 Semi-annual groundwater surface elevation results will be reported as specified in Permit Part 5, Condition Section 5.10.2.2.
15 16 17	The DMP data used in generating the Annual Culebra Groundwater Report will be maintained as part of the WIPP facility Operating Record and will be provided to <u>the NMED</u> for review as specified in the permit.
18	L-6 Records Management
19 20 21	Records generated during groundwater sampling and water level monitoring will be maintained in either project files at the Permittees facility or the Operating Record. Project files will include, but are not limited to:
22 23 24 25 26 27 28	 Sampling and Analysis Plans (SAPs) SOPs Field Data Entry Sheets CofC/RFA forms Analytical Laboratory Data Reports Variance Logs and Nonconformance Reports Corrective Action Reports.
29 30	Detection Monitoring Program monitoring, testing, and analytical data and WLMP data will be maintained in the WIPP facility Operating Record.
31	L-7 Quality Assurance Requirements
32	Quality Assurance (QA) requirements specific to the DMP are presented in this section.

1 <u>L-7a Data Quality Objectives and Quality Assurance Objectives</u>

2 <u>L-7a(1) Data Quality Objectives</u>

- 3 Data Quality Objectives (**DQOs**) are qualitative and quantitative statements that specify the
- 4 quality of data required to support project decisions. DQOs have been established to ensure
- that the data collected will be of a sufficient and known quality for their intended uses. The
- 6 overall DQOs for this DMP are shown in the following sections.

7 <u>L-7a(1)(i) Detection Monitoring Program</u>

- 8 Collect accurate and defensible data of known quality that will be sufficient to assess the
- ⁹ concentrations of constituents in the groundwater underlying the WIPP facility.

10 L-7a(1)(ii) Water Level Monitoring Program

11 Collect accurate and defensible data of known quality that will be sufficient to assess the 12 groundwater flow direction and rate at the WIPP facility.

13 L-7a(2) Quality Assurance Objectives

14 Quality Assurance Objectives (**QAOs**) for measurement data have been specified in terms

of accuracy, precision, completeness, representativeness, and comparability.

16 <u>L-7a(2)(i) Accuracy</u>

Accuracy is the closeness of agreement between a measurement and an accepted reference value. When applied to a set of observed values, accuracy is a combination of a random component and a common systematic error (bias) component. Measurements for accuracy will include analysis of calibration standards, laboratory control samples, matrix spike samples, and surrogate spike recoveries. The bias component of accuracy is expressed as percent recovery (%R). Percent recovery is expressed as follows:

23

$$\% R = \frac{(measured sample concentration)}{true concentration} \times 100$$

24 L-7a(2)(i)(A) Accuracy Objectives for Field Measurements

Field measurements will include pH, Specific Conductance (SC), temperature, specific 25 gravity, and static groundwater surface elevation. Field measurement accuracy will be 26 determined using calibration standards. Thermometers used for field measurements will be 27 calibrated to the National Institute for Standards and Technology (NIST) traceable standard 28 on an annual basis to ensure accuracy. Accuracy of groundwater surface elevation 29 measurements will be checked before each measurement period by verifying calibration of 30 the device within the specified schedule. WIPP Waste Isolation Pilot Plant document WP 13-31 1 outlines the basic requirements for field equipment use and calibration. WIPP Waste 32 Isolation Pilot Plant facility SOPs contains instructions that outline protocols for maintaining 33 current calibration of groundwater surface elevation measurement instrumentation. 34

1 L-7a(2)(i)(B) Accuracy Objectives for Laboratory Measurements

Analytical system accuracy will be quantified using the following laboratory accuracy QC checks: calibration standards, laboratory control samples (**LCS**), laboratory blanks, matrix and surrogate spike recoveries. Single LCSs and matrix spike and surrogate spike sample analyses will be expressed as %R. Laboratory analytical accuracy is parameter dependent and will be prescribed in the laboratory SOP.

7 L-7a(2)(ii) Precision

8 Precision is the agreement among a set of replicate measurements without assumption or

⁹ knowledge of the true value. Precision data will be derived from duplicate field and

10 laboratory measurements. Precision will be expressed as relative percent difference (RPD),

11 which is calculated as follows:

12
$$\frac{RPD}{average of measured samples 1 - measured value sample 2} \times \frac{|(measured value sample 2)|}{2} \times \frac{|(v_1 - v_2)|}{2} \times 100$$

- 13 <u>Where</u>
- 14 <u>RPD = relative percent difference</u>
- 15 $\underline{V_1} = \text{sample 1 measured value}$

16 $V_2 = \text{sample 2 measured value}$

17 <u>L-7a(2)(ii)(A)</u> Precision Objectives for Field Measurements

Specific conductance, pH, and temperature will be measured during well purging and after sampling. SC-Specific conductance measurements will be precise to $\pm 10\%$ pH to 0.10 standard unit, specific gravity to 0.01 by hydrometer and temperature to 0.10 degrees Celsius (°C). Water-level measurements will be precise to ± 0.01 ft. The precision of water density measurements, when measured in the field-calculated using down-hole pressuretransducer datainstrumentation, will be determined on a well-by-well basis and will result in no more than a ± 2 ft of error in the derived fresh-water head.

25 <u>L-7a(2)(ii)(B)</u> Precision Objectives for Laboratory Measurements

Precision of laboratory analyses will be determined by analyzing an LCS and a lab control sample duplicate (**LCSD**) or by analyzing one of the field samples in duplicate depending on the requirements of the particular standard method. The precision is measured as the RPD of the recoveries for the spiked LCS/LCSD pair or the RPD of the duplicate sample analysis results. Laboratory analytical precision is also parameter dependent and will be prescribed in laboratory SOPs.

32 L-7a(2)(iii) Contamination

In addition to measurements of precision and bias, QC checks for contamination will be
 performed. QC samples including trip blanks, field blanks, and method blanks will be
 analyzed to assess and document contamination attributable to sample collection
 equipment, sample handling and shipping, and laboratory reagents and glassware. Trip

blanks will be used to assess volatile organic compound (VOC) sample contamination 1 2 during shipment and handling and will be collected and analyzed at a frequency of 1-one sample per sample shipment. Field blanks will be used to assess field sample collection 3 methods and will be collected and analyzed at a minimum frequency of one sample per 20 4 samples (five percent of the samples collected). Method blanks will be used to assess 5 contamination resulting from the analytical process and will be analyzed at a minimum 6 frequency of one sample per 20 samples, or five percent of the samples collected. 7 Evaluation of sample blanks will be performed following U.S. EPA "National Functional 8 Guidelines for Organic Data Review" (EPA, 1999) and "National Functional Guidelines for 9 Evaluating Inorganics Analyses" (EPA, 2004). Only method blanks will be analyzed via wet 10 chemistry methods. The criteria for evaluating method blanks will be established as follows: 11 If method blank results exceed method reporting limits, then that value will become the 12 detection limit for the sample batch. Detection of analytes of interest in method blank 13 samples may be used to disgualify some samples, requiring resampling and additional 14 15 analyses on a case-by-case basis.

16 <u>L-7a(2)(iv) Completeness</u>

17 Completeness (<u>%C)</u> is a measure of the amount of usable valid data resulting from a data

collection activity, given the sample design and analysis. Completeness (<u>%C)</u> may be

affected by unexpected conditions that may occur during the data collection process.

Occurrences that reduce the amount of data collected include sample container breakage 20 during sample shipment or in the laboratory and data generated while the laboratory was 21 operating outside prescribed QC limits. All attempts will be made to minimize data loss and 22 to recover lost data whenever possible. The completeness objective for analysis of Permit 23 Part 5, Table 5.4 a parameters will be 90 percent and 100 percent analysis of Permit Part 5, 24 Table 5.4.b hazardous constituents. If the completeness objective for Permit Part 5, Table 25 5.4.b hazardous constituents is not met, the Permittees will determine the need for 26 27 resampling on a case-by-case basis. Numerical expression of the completeness (%C) of data is as follows: 28

29
$$%C = \frac{number of accepted samples}{total number of samples collected} \times 100$$

30 <u>L-7a(2)(v) Representativeness</u>

Representativeness is the degree to which sample analyses accurately and precisely represent the media they are intended to represent. Data representativeness for this DMP will be accomplished through implementing approved sampling procedures and the use of validated analytical methods. Sampling procedures will be designed to minimize factors affecting the integrity of the samples. Groundwater samples will only be collected after well purging criteria have been met. The analytical methods selected will be those that will most accurately and precisely represent the true concentration of analytes of interest.

For water levels and density, representativeness is a qualitative term that describes the
 extent to which a sampling design adequately reflects the environmental conditions of a site.
 The SOPs for measurement ensure that samples are representative of site conditions.

1 <u>L-7a(2)(vi)</u> Comparability

2 Comparability is the extent to which one data set can be compared to another.

3 Comparability will be achieved through reporting data in consistent units and collection and

analysis of samples using consistent methodology. Aqueous samples will consistently be

5 reported in units of measures dictated by the analytical method. Units of measure include:

- Milligrams per liter (mg/L) for alkalinity, inorganic compounds and metals and
- Micrograms per liter (µg/L) for VOCs and semivolatile organic compounds (SVOCs).
- 8 Culebra groundwater surface elevation measurements will be expressed as equivalent 9 freshwater elevation in feet above mean sea level.
- 10 L-7b Design Control

11 The approved design for the DMP is specified in this Permit<u>Attachment</u>. Modifications to the

DMP will be processed in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §§ 270.42).

14 L-7c Instructions, Procedures, and Drawings

The preparation and use of instructions and procedures at the WIPP facility are outlined in the WIPP facility document WP 13-1_(see Table L-3). Activities performed for the DMP that

17 may affect groundwater data quality will be performed in accordance with approved

18 procedures which comply with the Permit.

19 <u>L-7d Document Control</u>

20 Permittees will ensure that the latest approved versions of WIPP facility SOPs will be used

in performing groundwater monitoring functions and that obsolete materials will be

22 adequately identified or removed from work areas.

23 <u>L-7e Inspection and Surveillance</u>

Inspection and surveillance activities will be conducted as outlined in WIPP document WP

13-1 (see Table L-3). The Permittees will be responsible for performing the applicable WIPP
 facility SOPs.

27 <u>L-7f Control of Monitoring and Data Collection Equipment</u>

WIPP document WP 13-1 (see Table L-3) outlines the basic requirements for control and 28 calibrating monitoring and data collection (M&DC) equipment. M&DC equipment shall be 29 properly controlled, calibrated, and maintained according to WIPP facility SOPs (see Table 30 L-3) to ensure continued accuracy of groundwater monitoring data. Results of calibrations, 31 maintenance, and repair will be documented. Calibration records will identify the reference 32 standard and the relationship to national standards or nationally accepted measurement 33 systems. Records will be maintained to track uses of M&DC equipment. If M&DC equipment 34 is found to be out of tolerance, the equipment will be tagged and removed from service until 35 corrections have been madeand it will not be used until corrections are made. 36

1 <u>L-7g</u> Control of Nonconforming Conditions

In accordance with WP 13-1 (see Table L-3), equipment that does not conform to specified
 requirements will be controlled to prevent use. The disposition of defective items will be
 documented on records traceable to the affected items. Prior to final disposition, faulty items
 will be tagged and segregated. Repaired equipment will be subject to the original

6 acceptance inspections and tests prior to use.

7 L-7h Corrective Action

- Requirements for the development and implementation of a system to determine, document,
 and initiate appropriate corrective actions after encountering conditions adverse to quality at
 the WIPP facility are outlined in WIPP document WP 13-1 (see Table L-3). Conditions
 adverse to acceptable quality will be documented and reported in accordance with
 corrective action procedures and corrected as soon as practical. Immediate action will be
 taken to control work performed under conditions adverse to acceptable quality and its
 results to prevent quality degradation.
- 15 <u>L-7i Quality Assurance Records</u>
- WIPP document<u>Standard operating procedure</u> WP 13-1_(see Table L-3) outlines the policy
 that will be used at the WIPP facility regarding identification, preparation, collection, storage,
 maintenance, disposition, and permanent storage of QA records.
- 19 Records to be generated in the DMP will be specified by procedure. Quality Assurance (QA)
- and RCRA operating Operating records Records will be identified. This will be the basis for
- the labeling of records as "QA" or "RCRA operating <u>Operating record</u> ecord" on the
- 22 Environmental Monitoring Records Inventory and Disposition Schedule.
- 23 <u>L-8 References</u>
- Beauheim, R.L., 1986. "Hydraulic-Test Interpretations for Well DOE-2 at the Waste Isolation
- 25 Pilot Plant (WIPP) Site," SAND86-1364, Sandia National Laboratories/New Mexico,
- Albuquerque, New Mexico.
- Beauheim, R.L., 1987. "Analysis of Pumping Tests at the Culebra Dolomite Conducted at
 the H-3 Hydropad at the Waste Isolation Pilot Plant (WIPP) Site," SAND86-2311, Sandia
 National Laboratories/New Mexico, Albuquergue, New Mexico.
- 30 Beauheim, R.L., and Holt, R.M., 1990. "Hydrogeology of the WIPP Site," in Powers, D.W.,
- 31 Holt, R.M., Beauheim, R.L., and Rempe, N., eds., Geological and Hydrological Studies of
- 32 Evaporites in the Northern Delaware Basin for the Waste Isolation Pilot Plant (WIPP):
- 33 <u>Guidebook 14, Geological Society of America (Dallas Geological Society), p. 131-179,</u>
- 34 <u>Dallas, Texas.</u>
- ³⁵ Corbet, T.F., and P.M. Knupp, 1996. "The Role of Regional Groundwater Flow in the
- ³⁶ Hydrogeology of the Culebra Member of the Rustler Formation at the Waste Isolation Pilot
- ³⁷ Plant (WIPP), Southeastern New Mexico," *SAND96-2133*, Sandia National
- Laboratories/New Mexico, Albuquerque, New Mexico.

- 1 Crawley, M. and M. Nagy, 1998. "WIPP RCRA Background Groundwater Quality Baseline
- 2 Report," DOE/WIPP-98-2285.
- 3 Davies, P.B., 1989. "Variable-Density Ground-Water Flow and Paleohydrology in the Waste
- 4 Isolation Pilot Plant (WIPP) Region, Southeastern New Mexico," U.S. Geological Survey
- 5 Open-File Report 88-490, Albuquerque, New Mexico.
- 6 DOE, see U.S. Department of Energy.
- Domenico, P.A., and F.W. Schwartz, 1990. "Physical and Chemical Hydrogeology," New
 York: John Wiley & Sons, Textbook.
- Domski, P.S., and R.L. Beauheim. 2008. <u>"Evaluation of Culebra Brine Chemistry.</u> AP-125.
 ERMS <u>549336549443.</u> Carlsbad, NM: Sandia National Laboratories. (In development)
- Domski, P.S., D.T. Upton, and R.L. Beauheim, 1996. "Hydraulic Testing Around Room Q:
- 12 Evaluation of the Effects of Mining on the Hydraulic Properties of Salado Evaporites,"
- 13 SAND96-0435, Sandia National Laboratories/New Mexico, Albuquerque, New Mexico.
- Earlough, E.C., Jr., 1977. "Advances in Well Test Analysis,": Society of Petroleum Engineers
 of AIME, Textbook, Dallas, Texas.
- 16 EPA, see U.S. Environmental Protection Agency.
- 17 Holt, R.M., 1997. "Conceptual Model for Transport Processes in the Culebra Dolomite
- 18 Member, Rustler Formation": SAND97-1094, Sandia National Laboratories. Albuquerque,
- 19 <u>New Mexico.</u>
- Holt, R.M., and D.W. Powers, 1988. "Facies Variability and Post-Deposition Alteration Within the Rustler Formation in the Vicinity of the Waste Isolation Pilot Plant, Southeastern New
- Mexico," DOE-WIPP-88-04, U.S. Department of Energy, Carlsbad, New Mexico.
- Holt, R.M., Beauheim, R.L., and Powers, D.W., 2005. "Predicting Fractured Zones in the
- 24 Culebra Dolomite," in Faybishenko, B, Witherspoon, P.A., and Gale, J., eds., Dynamics of
- 25 Fluids and Transport in Fractured Rock: AGU Geophysical Monograph Series, v. 162, p.
- 26 <u>103-116. Sandia National Laboratories. Carlsbad, New Mexico.</u>

Holt, R.M., and Powers, D.W., 2010. "Evaluation of halite dissolution at a radioactive waste
 disposal site," Andrews County, TX: Geological Society of America Bulletin, v. 122, p. 1989 2004, DOI: 10.1130/B30052.1.

Holt, R.M., and Yarbrough, 2002. "Analysis Report, Task 2 of AP 088, Estimating Base
 Transmissitivity Fields": ERMS 523889, Sandia National Laboratories, Carlsbad, NM.

- IT Corporation, "2000 Addendum 1 Waste Isolation Pilot Plant RCRA Background
 Groundwater Quality Baseline Update Report.-" Albuquerque, New Mexico.
- 34 Kuhlman, K.L. 2010. "Analysis Report, AP-111 Revision 1, Culebra Water Level Monitoring
- ³⁵ Network Design,<u>"</u>- ERMS 554054. Carlsbad, NM: Sandia National Laboratories.

- McKenna, S. A. 2004. <u>"Analysis Report: Culebra Water Level Monitoring Network Design.</u>"
 AP-111. ERMS 540477. Carlsbad, NM: Sandia National Laboratories.
- 3 Mercer, J.W., 1983. "Geohydrology of the Proposed Waste Isolation Pilot Plant Site, Los
- Medaños Area, Southeastern New Mexico," U.S. Geological Survey, Water Resources
 Investigations 83-4016, 113 pp.
- 6 Powers, D. W. 2006. <u>"Analysis Report.</u> Task 1B of AP-114. Identify Possible Area of
- 7 Recharge to the Culebra West and South of WIPP (April 1) $_{\pm^{-}}$ ERMS 543094 $_{\pm^{-}}$ Carlsbad, NM:
- 8 Sandia National Laboratories.
- 9 Powers, D.W., Holt, R.M., Beauheim, R.L., and McKenna, S.A., 2003. "Geological Factors
- 10 Related to the Transmissivity of the Culebra Dolomite Member, Permian Rustler Formation,
- 11 Delaware Basin, Southeastern New Mexico," in Johnson, K.S., and Neal, J.T., eds.,
- 12 <u>Evaporite karst and engineering/environmental problems in the United States: Oklahoma</u>
- 13 <u>Geological Survey Circular 109, p. 211-218.</u>
- 14 Powers, D.W., Holt, R.M., Beauheim, R.L., and Richardson, R.G., 2006. "Advances in
- 15 Depositional Models of the Permian Rustler Formation, Southeastern New Mexico," in

16 Caves & Karst of Southeastern New Mexico, L. Land and others, eds., NM Geological

- 17 <u>Society Fifty-seventh Annual Field Conference Guidebook, p. 267-276.</u>
- Roberts, R. M. 2007. "Analysis of Culebra Hydraulic Tests Performed Between June 2006
 and September 2007." ERMS 547418. Carlsbad, NM: Sandia National Laboratories.
- 20 Siegel, M.D., K. L. Robinson, and J. Myers. 1991. "Solute Relationships in Groundwaters
- from the Culebra Dolomite and Related Rocks in the Waste Isolation Pilot Plant Area,
 Southeastern New Mexico," SAND88-0196.
- 23 Sturchio, N.C., K.L. Kuhlman, Yokochi, R., Probst, P.C., Jiang, W., Lu, Z.T., Mueller, P.,
- Jiang, W., and Yang, G.M. 2014. Krypton-81 in groundwater of the Culebra Dolomite near
 the Waste Isolation Pilot Plant, New Mexico. Contam. Hydrol 160:12-20.
- 26 Thomas MA, K.L. Kuhlman, and A.L. Ward. 2017. "Anthropogenic influences on
- 27 groundwater in the vicinity of a long-lived radioactive waste repository," Hydrol Process
 28 31:2637-2647.
- U.S. Department of Energy (DOE), 1995. "Basic Data Report for WQSP-1 through WQSP 6A," DOE/WIPP-95-2154.
- U.S. Department of Energy (DOE), 2009, "WIPP Hazardous Waste Facility Permit
 Amended Renewal Application," Carlsbad, New Mexico.
- <u>U.S. Department of Energy (DOE), 2020. "WIPP Hazardous Waste Facility Permit Renewal</u>
 <u>Application," Carlsbad, New Mexico.</u>
- U.S. Environmental Protection Agency (EPA), 2009. "Statistical Analysis of Ground-Water
- Monitoring Data at RCRA Facilities, Unified Guidance," U.S. Environmental Protection
- 37 Agency, Washington, D.C.

U.S. Environmental Protection Agency (EPA), 1999. "National Functional Guidelines for
 Organic Data Review," U.S. Environmental Protection Agency, Washington, D.C.

U.S. Environmental Protection Agency (EPA), 1990. "Background Documentation for the
 U.S. Environmental Protection Agency's Proposed Decision on the No-Migration Variance
 for U.S. Department of Energy's Waste Isolation Pilot Plant," U.S. Environmental Protection
 Agency, Washington, D.C.

U.S. Environmental Protection Agency (EPA), 2004. "Functional Guidelines for Evaluating
 Inorganics Analyses," U.S. Environmental Protection Agency, Washington, D.C.

9 U.S. Environmental Protection Agency (EPA), 1986. "RCRA Ground-Water Monitoring

- 10 Technical Enforcement Guidance Document," U.S. Environmental Protection Agency,
- 11 Washington, D.C.
- U.S. Environmental Protection Agency (EPA), <u>2015</u>1996. "Test Methods for Evaluating Solid
- 13 Waste," *SW-846*, third ed., Office of Solid Waste and Emergency Response, Washington,
- 14 D.C.

1	TABLES

 Table L-1

 Hydrological Parameters for Rock Units above the Salado at the WIPP Site

Unit Santa Rosa Dewey Lake		Hydraulic Conductivity	Storage	Thickness	Hydraulic Gradient
		2 × 10 ⁻⁸ to 2 × 10 ⁻⁶ m/s (1) (2)		0 to 91 m	0.001 (5)
		10 ⁻⁸ m/s	Specific storage $1 \times 10^{-5} (1/m) (2)$	152 m	0.001 (5)
	Forty-niner	1 × 10^{-13} to 1 × 10^{-11} m/s (anhydrite) 1 × 10^{-9} m/s (mudstone) (2)	Specific storage 1 x 10 ⁻⁵ (1/m) (2)	13 to 23 m	NA (6)
	Magenta	1 × 10 ^{-8.5} to 1 × 10 ^{-6.5} m/s (2)	Specific storage $1 \times 10^{-5} (1/m) (2)$	7 to 8.5 m	3 to 6
Rustler	Tamarisk	1 × 10 ⁻¹³ to 1 × 10 ⁻¹¹ m/s (anhydrite) 1 × 10 ⁻⁹ m/s (mudstone) (2)	Specific storage 1 x 10 ⁻⁵ (1/m) (2)	26 to 56 m	NA (6)
	Culebra	$1 \times 10^{-7.5}$ to $1 \times 10^{-5.5}$ m/s (2)	Specific storage 1 × 10 ⁻⁵ (1/m) (2)	4 to 11.6 m	0.003 to 0.007 (5)
	Los Medaños	6×10^{-15} to 1×10^{-13} m/s 1.5×10^{-11} to 1.2×10^{-11} m/s (basal interval)	Specific storage 1 × 10 ⁻⁵ (1/m) (2)	29 to 38 m	NA (6)

Matrix characteristics relevant to fluid flow include values used in this table such as permeability, hydraulic conductivity, gradient, etc.)

Table Notes:

- (1) The Santa Rosa Formation is not present in the western portion of the WIPP site. It was combined with the Dewey Lake Red Beds in three-dimensional regional groundwater flow modeling (Corbet and Knupp, 1996), and the range of values entered here are those used in that study for the Dewey Lake/Triassic hydrostratigraphic unit.
- (2) Values or ranges of values given for these entries are the values used in three-dimensional regional groundwater flow modeling (Corbet and Knupp, 1996). Values are estimated based on literature values for similar rock types, adjusted to be consistent with site-specific data where available. Ranges of values include spatial variation over the WIPP site and differences in values used in different simulations to test model sensitivity to the parameter.
- (3) Hydraulic gradient is a dimensionless term describing change in the elevation of hydraulic head divided by change in horizontal distance. Values given in these entries are determined from potentiometric surfaces. The range of values given for the Culebra reflects the highest and lowest gradients observed within the WIPP site boundary. Values for the Dewey Lake and Santa Rosa are assumed to be the same as the gradient determined from the water table. Note that the Santa Rosa Formation is absent or above the water table in most of the controlled area, and that the concept of a horizontal hydraulic gradient is not meaningful for these regions.
- (4) Flow in units of very low hydraulic conductivity is slow, and primarily vertical. The concept of a horizontal hydraulic gradient is not applicable.

Sources: Beauheim, (1986); Domenico and Schwartz, (1990); Domski, Upton, and Beauheim, (1996); Earlough, (1977).

Table L-2 WIPP Groundwater Detection Monitoring Program Sample Collection and Groundwater Surface Elevation Measurement Frequency

Installation	Frequency
Groundwate	er Quality Sampling
DMWs	Annually
Groundwater Sur	face Elevation Monitoring
DMWs	Monthly and prior to sampling events
WLMP Wells (see Table L-4)	Monthly

 Table L-3

 Standard Operating Procedures Applicable to the DMP

Number	Title/Description
WP 02-EM1010	Field Parameter Measurements and Final Sample Collection: This procedure provides general instructions necessary to perform field analyses of serial samples in support of the DMP. Serial samples are collected and analyzed at the field laboratory for field indicators. Serial sample results help determine if pumped groundwater is representative of undisturbed groundwater within the formation. This procedure also describes the steps for collecting groundwater samples from the DMWs near the WIPP facility. Samples are collected and analyzed at the Field Laboratory until stabilization of the field parameters occurs. Final samples for Resource Conservation and Recovery Act (RCRA) analyses are collected and analyzed by a contract laboratory.
WP 02-EM1014	Groundwater Level Measurement: This document describes the method used for groundwater level measurements in support of groundwater monitoring at the WIPP facility using a portable electronic water-level probe.
WP 02-EM1026	Water Level Data Handling and Reporting: This procedure provides instructions on handling water level data. Data are collected and recorded on field forms in accordance with WP 02-EM1014. This procedure is initiated when wells in the water surveillance program have been measured for a given month.
WP 02-EM3001	Administrative Processes for Environmental Monitoring and Hydrology Programs: This procedure provides the administrative guidance environmental monitoring personnel use to maintain quality control associated with environmental monitoring sampling and reporting activities. This administrative procedure does not pertain to volatile organic compound (VOC) monitoring, with the exception of Section 5.0 which pertains to the regulatory reporting review process.
WP 02-EM3003	Data Validation and Verification of RCRA Constituents: This procedure provides instructions on performing verification and validation of laboratory data containing the analytical results of groundwater monitoring samples. This procedure is applied only to the non-radiological analyses results for compliance data associated with the detection monitoring samples. The data reviewed for this procedure includes general chemistry parameters and RCRA constituents.
WP-02-RC.01	Hazardous and Universal Waste Management Plan: This plan describes the responsibilities and handling requirements for hazardous and universal wastes generated at the WIPP facility. It is meant to ensure that these wastes are properly handled, accumulated, and transported to an approved Treatment, Storage, Disposal Facility (TSDF) in accordance with applicable state and federal regulations, U.S. Department of Energy (DOE) Orders, and Management and Operating Contractor (MOC) policies and procedures. This plan implements applicable sections of 20.4.1.100-1102 New Mexico Administrative Code (NMAC), <i>Hazardous Waste Management</i> (incorporating 40 <i>Code of Federal Regulations</i> [CFR] Parts 260-268 and 273).
WP 10-AD3029	Calibration and Control of Monitoring and Data Collection Equipment: This procedure provides direction for the control and calibration of Monitoring and Data Collection (M&DC) equipment at the WIPP facility, and ensures traceability to NIST (National Institute of Standards and Technology) <u>(NIST)</u> standards, international standards, or intrinsic standards. This procedure also establishes requirements and responsibilities for identifying recall equipment, and for obtaining calibration services for WIPP facility M&DC equipment.
WP 13-1	Management and Operating Contractor Quality Assurance Program Description: This document establishes the minimum quality requirements for MOC personnel and guidance for the development and implementation of QA guality assurance programs by MOC organizations.

 Table L-4

 List of Culebra Wells in the WLMP, Current as of January 2020

WELL ID	WELL ID	WELL ID
AEC-7R	IMC-461	SNL-15
C-2737	SNL-1	SNL-16
H-4bR	SNL-2	SNL-17
H-5b <mark>R</mark>	SNL-3	SNL-18
H-6bR	SNL-5	SNL-19
H-9bR	SNL-6	WQSP-1
H-10cR	SNL-8	WQSP-2
H-11b4R	SNL-9	WQSP-3
H-12R	SNL-10	WQSP-4
H-15R	SNL-12	WQSP-5
H-16	SNL-13	WQSP-6
H-19 pad*	SNL-14	WIPP-11 <mark>R</mark>

*The water level for the H-19b0 well on the H-19 pad is measured monthly; the fluid density measured annually at well H-19b0 will be used to correct for freshwater head for the other wells on the H-19 pad (H-19b2, H-19b3, H-19b4, H-19b5, H-19b6, and H-19b7).

Table L-5
Details of Construction for the Six Culebra Detection Monitoring Wells

			DEPTH		IG DEPTHS eters) bgs		SING ters) bgs	PACI feet (met		
NAME (Figure)	DATE DRILLED	TOTAL DEPTH feet (meters) bgs	INTO LOS MEDAÑOS	WITH AIR	CORING	DEPTH FOR 5 in. CASING	INTERVAL FOR SLOTTED SCREEN	SAND PACK INTERVAL	BRADY GRAVEL PACK INTERVAL	CULEBRA INTERVAL feet (meters) bgs
WQSP-1 Figure <u>M-</u> <u>70</u> L-7	September 13 through 16, 1994	737 (225)	15 (5)	696 (212)	696 to 737 (212 to 225)	737 (225-<u>22</u> <u>5</u>)	702 to 727 (214 to 222-<u>222</u>)	640 to 651 (195 to 198)	651 to 737 (198 to 225)	699 to 722 (213 to 220)
WQSP-2 Figure <u>M-</u> <u>71</u> L-8	September 6 through 12, 1994	846 (258)	12 (4)	800 (244)	800 to 846 (244 to 258)	846 (258)	811 to 836 (247 to 255)	790 to 793 (241 to 242)	793 to 846 (242 to 258)	810.1 to 833.7 (247 to 254)
WQSP-3 Figure <u>M-</u> <u>72</u> L-9	October 20 through 26, 1994	880 (268)	10 (3)	833 (254)	833 to 880 (254 to 268)	880 (268)	844 to 869 (257 to 265)	827 to 830 (252 to 253)	830 to 880 (253 to 268)	844 to 870 (257 to 265)
WQSP-4 Figure <u>M-</u> <u>73</u> L-10	October 5 through 10, 1994,	800 (244)	9 (3)	740 (226)	740 to 798 (226 to 243)	800 (244)	764 to 789 (233 to 240)	752 to 755 (229 to 230)	755 to 800 (230 to 244)	766 to 790.8 (233 to 241)
WQSP-5 Figure <u>M-</u> <u>74</u> L-11	October 12 through 18, 1994,	681 (208)	7 (2)	648 (198)	648 to 676 (198 to 206)	681 (208)	646 to 671 (197 to 205)	623 to 626 (190 to 191)	626 to 681 (191 to 208)	648 to 674.4 (198 to 205)
WQSP-6 Figure <u>M-</u> <u>75</u> L-1 2	September 26 through October 3, 1994	616.6 (188)	10 (3)	568 (173)	568 to 617 (173 to 188)	617 (188)	581 to 606 (177 to 185)	567 to 570 (173 to 174)	570 to 616.6 (174 to 188)	582 to 606.9 (177 to 185)

Table L-6
Analytical Parameter and Sample Requirements

(10) PARAMETERS	(12) NO. OF BOTTLES	(13) VOLUME	(14) TYPE	(15) ACID WASH	(16) SAMPLE FILTER	(17) PRESERVATIVE	(18) HOLDING TIME
Indicator ¹ Parameters: 1.•_pH 2-•_SC 3.•_TOC	- - 4	25 ml²mL¹ 100 ml²mL¹ 15 ml²mL¹	Glass Glass Glass	Field determined Field determined yes	No ? No No	Field determined Field determined HCI	None None 28 days²<u>days</u>1
General Chemistry	1	1 LiterL	Plastic	Yes	No	HNO3,4pH<2	not specified in DMP
Phenolics	1	1 LiterL	Amber Glass	Yes	No	H ₂ SO ₄ , pH<2	not specified in DMP
Metals/Cations	2	1 LiterL	Plastic	Yes	No	HNO₃, pH<2	6 months ² , ^{3<u>1,2</u>}
VOC	4	40 ml<u>mL</u>	Glass	No	No	HCL, <u>pH_</u> ph<2	14 days²<u>days</u>¹
VOC (Purgable<u>Purgeable</u>)	2	40 ml<u>mL</u>	Glass	No	No	HCL, <u>pH_</u> ph<2	14 days²days 1
VOC (Non- Purgable<mark>Purgeable</mark>)	2	40 ml<u>mL</u>	Glass	No	No	HCL, <u>pH_</u> ph<2	14 days²days¹
BN/AsSemi-VOC	1	1/2 Gallon <u>1 L</u>	Amber Glass	Yes	No	None	<u>14 days¹</u>
TCLP	1	1 LiterL	Plastic	Yes	No	HNO₃, pH<2	7 days²<u>days</u>¹
Cyanide (Total)	1	1 LiterL	Plastic	Yes	No	NaOH, pH>12	14 days²<u>days</u>1
Sulfide	1	250 ml<u>mL</u>	Amber Glass	Yes	No	NaOH + Zn Acetate	28 days²<u>days</u>1
Radionuclides	1	1 Gallon	Plastic Cube	Yes	Yes	HNO₃, pH<2	6 months ² months ¹

1 = RCRA Detection Monitoring Analytes

2-1 = As specified in Table 4-1 of the RCRA TEGD

3-2 = Reduced holding time of 1 week for WIPP-specific Divalent cation 2 samples noted in the GMD

Note: Unless otherwise indicated, data are from DOE-Procedure WP 02-EM1006 methods and are provided as information only.

Note: Deviations from this table are allowed with prior approval by the NMED.

FIGURES

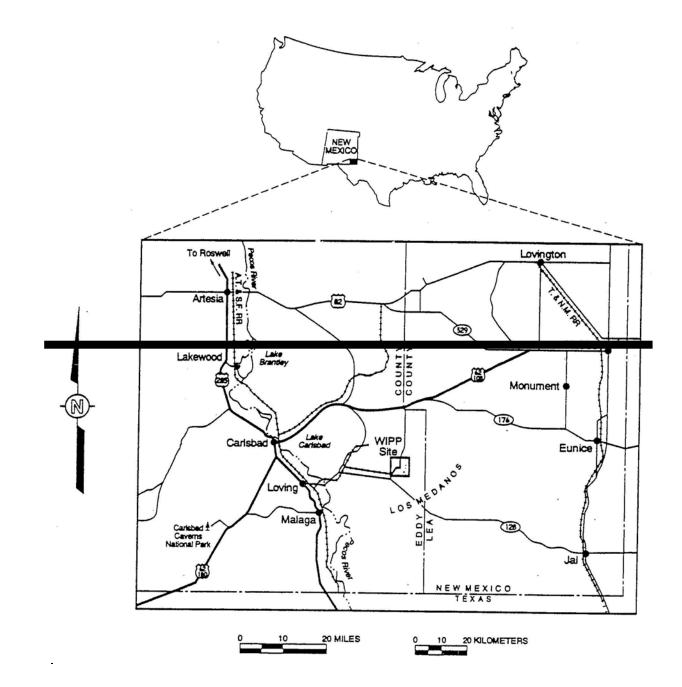


Figure L-1 General Location of the WIPP Facility

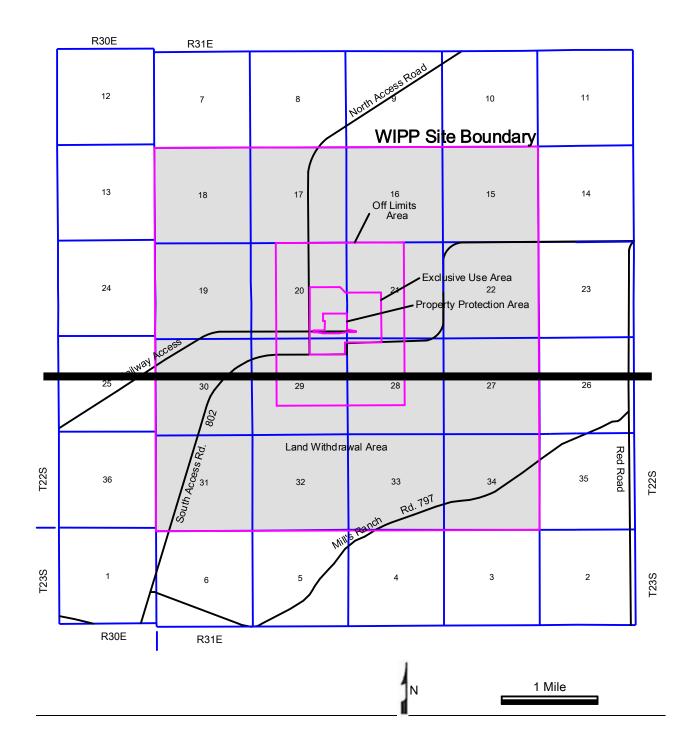


Figure L-2 WIPP Facility Boundaries Showing 16-square-Mile Land Withdrawal Boundary

SYSTEM	SERIES	GROUP	FORMATION	MEMBER
RECENT	RECENT		SURFICIAL DEPOSITS	
QUATERNARY	PLEISTOCENE	8	MESCALERO CALICHE	
1999			GATUÑA	
TERTIARY	MID- PLIOCENE		OGALLALA	
TRIASSIC		DOCKUM	SANTA ROSA	
			DEWEY LAKE	
		F		Forty-niner
				Magenta
			RUSTLER	Tamarisk
				Culebra
	AN			Los Medaños
	OCHOAN			Upper
			SALADO	MONULL POLASIN
AN				Lower
PERMIAN			CASTILE	
	AN	JNTAIN	BELL CANYON	
	GUADALUPIAN	DELAWARE MOUNT	CHERRY CANYON	
	0	DELA	BRUSHY CANYON	

Figure L-3 Site Geologic Column

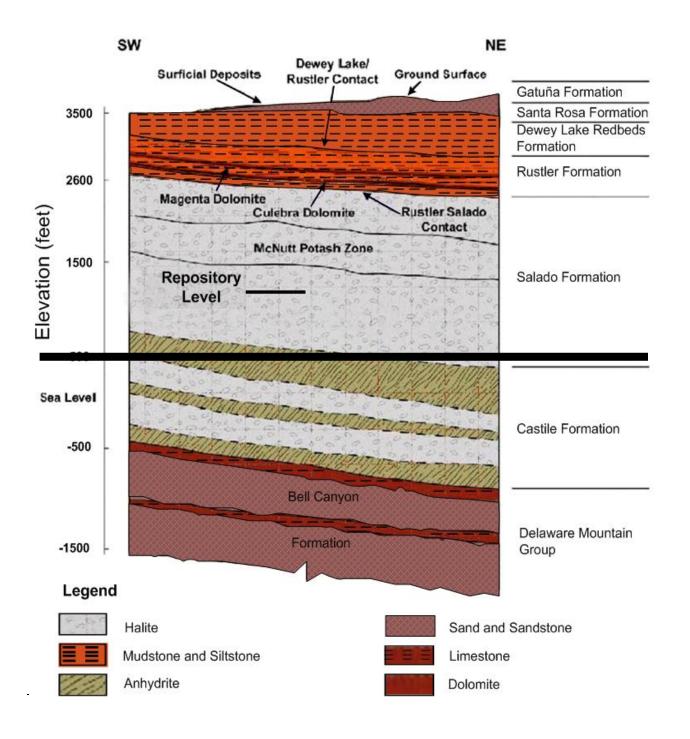
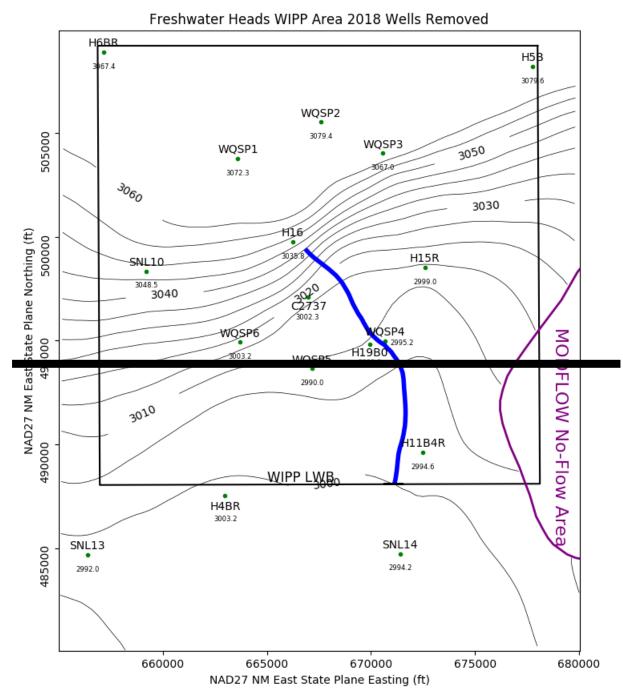


Figure L-4 Generalized Stratigraphic Cross Section above Bell Canyon Formation at WIPP Site



Model generated September 2019 utilizing May 2018 freshwater head contours with observed heads (ft) listed at each well. Contours are at 5 ft intervals with the blue line particle track from the waste handling shaft to the WIPP Land Withdrawal Boundary. The purple line is a constant head boundary representing the Rustler halite margin.

Figure L-5 Culebra Freshwater-Head Potentiometric Surface

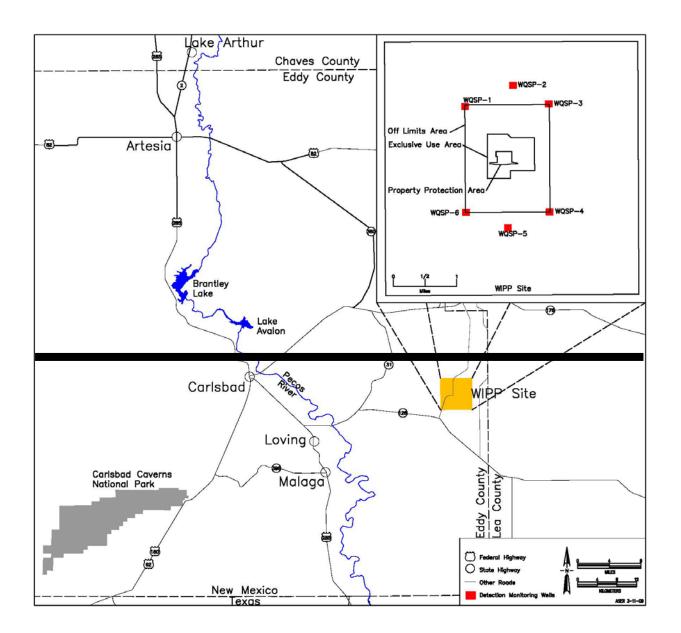


Figure L-6 Detection Monitoring Well Locations

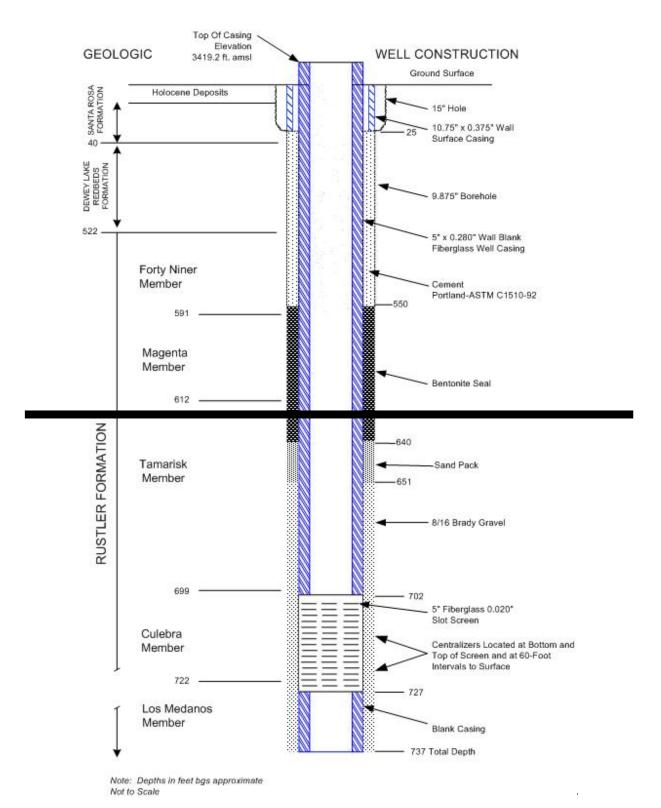


Figure L-7 As-Built Configuration of Well WQSP-1

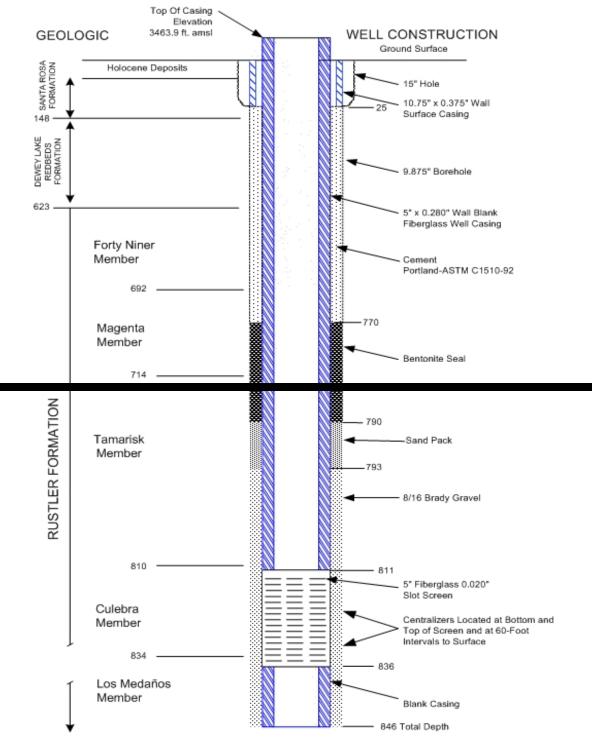
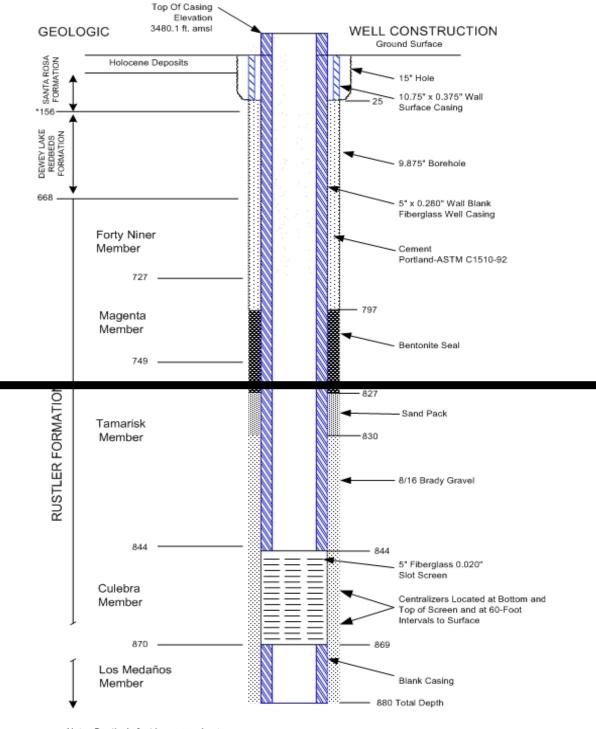


Figure L-8 As-Built Configuration of Well WQSP-2



*from DOE/WIPP-95-2154

Figure L-9 As-Built Configuration of Well WQSP-3

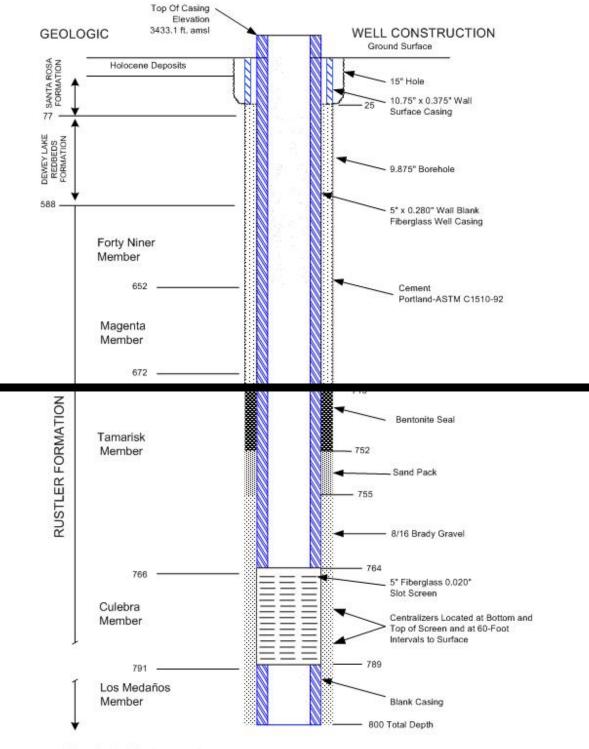


Figure L-10 As-Built Configuration of Well WQSP-4

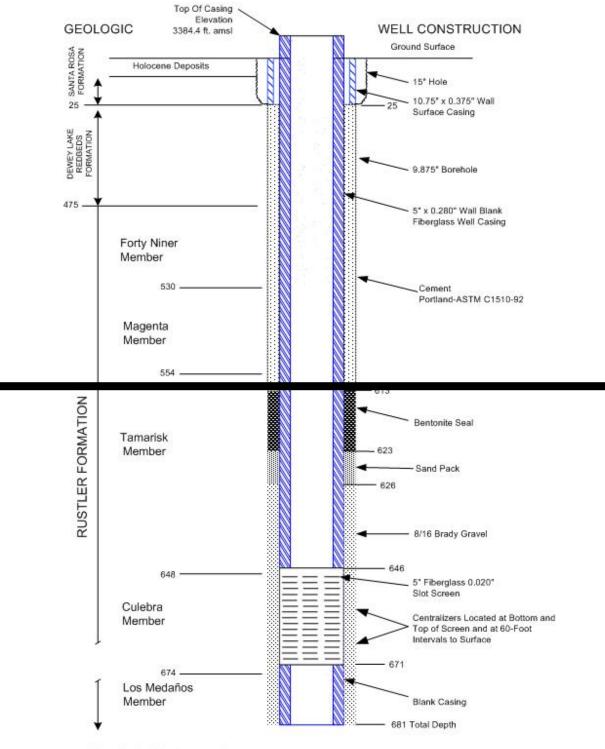


Figure L-11 As-Built Configuration of Well WQSP-5

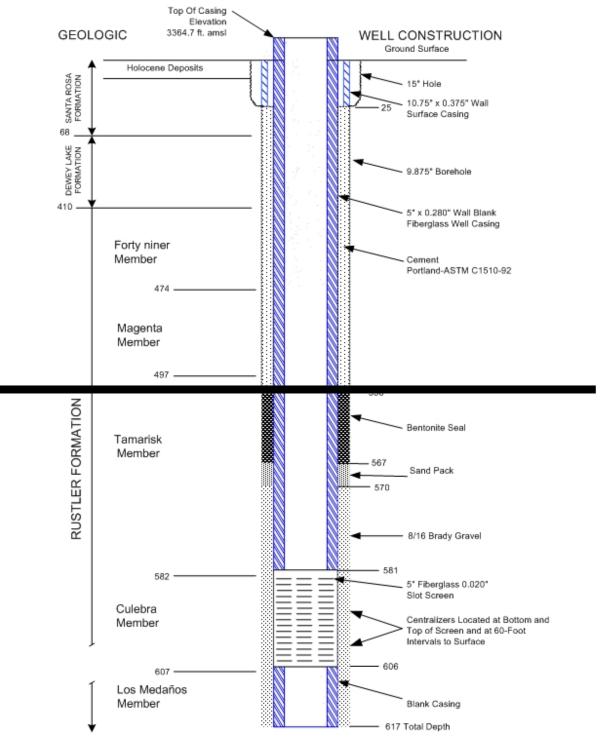


Figure L-12 As-Built Configuration of Well WQSP-6

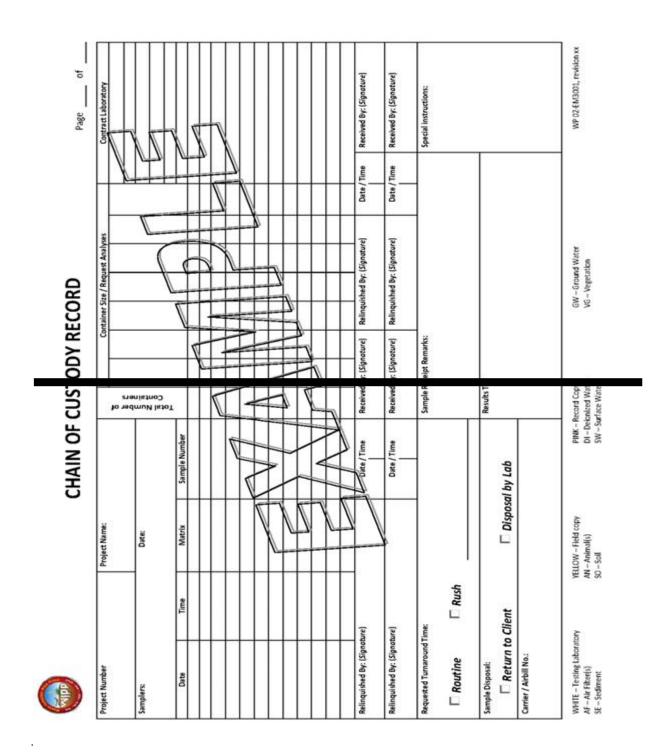


Figure L-13 Example Chain-of-Custody/Request for Analysis Form

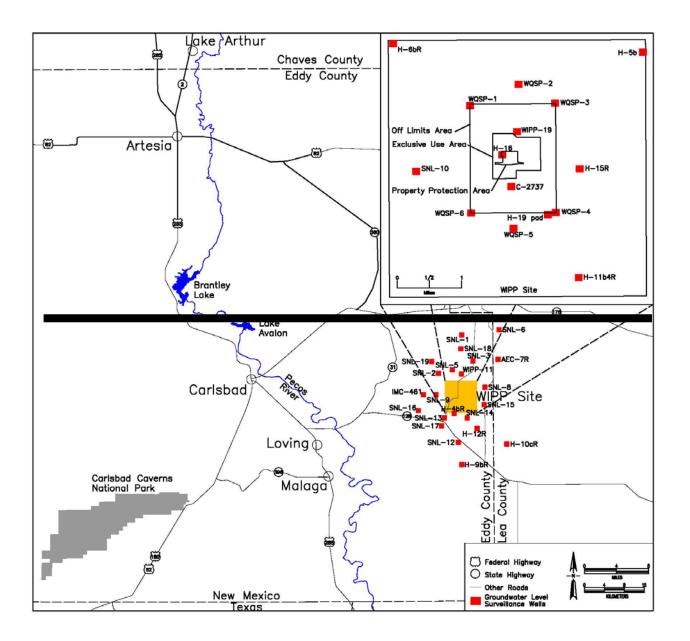


Figure L-14 Groundwater Level Surveillance Wells (inset represents the groundwater surveillance wells in WIPP Land Withdrawal Area)

ADDENDUM L1

SITE CHARACTERIZATION

ADDENDUM L1

SITE CHARACTERIZATION

TABLE OF CONTENTS

L1-1	Introduction	3
L1-2	Geological Updates Since 2009	3
L1-3	Seismicity Updates Since 2009	4
L1-4	Hydrology Updates Since 2009.L1-4aOptimization of Culebra Monitoring Well Network.L1-4bGeochemical AnalysisL1-4cSteel-Cased Well Reconfiguration and Replacement .L1-4dCulebra MonitoringL1-4dMagenta Monitoring.L1-4fDewey Lake MonitoringL1-4gBell Canyon Monitoring .	4 5 7 9 9
L1-5	Hydrology Summary and Conclusions	9
L1-6	References	10

2	Table	Title
3 4 5	Table L1-1 Table L1-2 Table L1-3	Culebra Wells Plugged, Abandoned, Replaced, or Repaired (2013 – 2019) Seismic Activity in the Delaware Basin (1926 – 2019) Wells Plugged, Abandoned, and/or Reconfigured (2008 – 2012)
6 7		LIST OF FIGURES
8	Figure	Title
9	Figure L1-1	Map of WIPP Area Showing Diffusion Corrected Kr-81 Age
10	Figure L1-2	Ranking of Steel-cased Well Locations with Three Metrics
11	Figure L1-3	Average Water Composition and Ionic Strength for Water Quality Samples Taken
12		from Geologic Units above the Salado Formation
13	Figure L1-4	Ionic Strength versus UTM Easting Coordinate for Water Quality Samples from
14		Wells above the Salado Formation
15	Figure L1-5	Locations of WIPP Wells and Wellpads
16	Figure L1-6	Culebra Well Downhole Pressure Transducer Data Coverage
17	Figure L1-7	Water Levels in Culebra Wells North of the WIPP Site
18	Figure L1-8	Water Levels in Culebra Wells in the Central Portion of the WIPP Site
19	Figure L1-9	WQSP-6A Dewey Lake Water Levels
20	Figure L1-10	Bell Canyon Water Levels

LIST OF TABLES

2

1

SITE CHARACTERIZATION

3 L1-1 Introduction

The information in this addendum is being provided pursuant to 20.4.1.900 New Mexico
 Administrative Code (NMAC) (incorporating 40 Code of Federal Regulations (CFR) §270.23).

6 There are no changes to the previous detailed hydrologic, geologic, and meteorological

7 assessments for the region surrounding the Waste Isolation Pilot Plant (WIPP) site that would

8 result in a modification of compliance for the miscellaneous unit in regards to environmental

9 performance standards of 20.4.1.500 NMAC (incorporating 40 CFR §264.601). This addendum

provides a summary of new or updated site characterization information collected since 2009,

11 which was the data cutoff for the previous Hazardous Waste Facility Permit Renewal Application

12 (DOE, 2009a).

13 L1-2 Geological Updates Since 2009

From December 2010 to January 2011, two potash exploration boreholes (MOS-20 and MOS-14 21) were drilled to the McNutt Potash zone by Mosaic Potash in T22S R31E sections 9 and 10. 15 Sandia National Laboratories logged the cuttings of both wells through the Rustler Formation 16 (Rustler) and also geophysically logged borehole MOS-21 (Schuhen, 2011). Both boreholes 17 encountered the Gatuña Formation (Gatuña), but only the eastern MOS-21 borehole (in section 18 10) encountered a section of the Santa Rosa Formation (Santa Rosa), located stratigraphically 19 between the Gatuña and Dewey Lake Redbeds Formations (Dewey Lake). These boreholes 20 were plugged and abandoned after Mosaic collected cores across the potash ore zones. The 21 boreholes provided additional confirmatory information related to the geologic units above the 22 Salado Formation (Salado). 23

Between 2013 and 2018, no new monitoring well locations were drilled to obtain additional 24 geologic information of the Rustler; however, replacement wells were drilled on existing well 25 pads (Table L1-1). Drill cuttings and geophysical logs were obtained to confirm the existing 26 conceptual model of the Rustler (DOE, 1996, 2016a, 2016b). The replacement well AEC-7R 27 encountered a normal stratigraphic sequence for locations northeast of the WIPP site (see 28 Figure L1-1). The Culebra Member of the Rustler (Culebra) (the unit monitored by AEC-7R) in 29 this location has a total thickness of 20 feet (ft) (6.1 meters (m)) and consists of vuggy textured 30 dolomite, but also contains a large amount of gypsum (DOE, 2016a). The replacement well H-31 12R encountered a normal stratigraphic sequence for locations southeast of the WIPP site. The 32 Culebra in this location has a total thickness of 27 ft (8.2 m) and is also vuggy in texture with 33 minor amounts of gypsum present (DOE, 2016b). The replacement well H-10cR encountered a 34 normal stratigraphic sequence for locations southeast of the WIPP site. The Culebra in this 35 location has a total thickness of 26 ft (7.9 m), which consisted of vuggy dolomite with gypsum. 36

In 2019, no new monitoring well locations were drilled to obtain additional geologic information;
 however two existing wells were replaced in order to modernize the well network. The
 replacement wells H-5bR and WIPP-11R encountered normal stratigraphic sequences for
 locations north of the WIPP site. The Culebra thickness for H-5bR and WIPP-11R were 27 ft
 (8.2 m) and 21 ft (6.4 m), respectively.

1 L1-3 Seismicity Updates Since 2009

Known seismic events occurring in southeast New Mexico and west Texas, specifically in the
 Delaware Basin, were recorded in the Delaware Basin Well Tracking Application (DOE, 2019a).

4 This information is obtained from the New Mexico Institute of Mining and Technology (**NMIMT**),

5 Socorro, New Mexico, utilizing data from an array of nine seismographs in the vicinity of the

6 WIPP site (NMIMT 2018, 2019a, 2019b, 2019c).

7 Since 1926, seismic events have been recorded in the Delaware Basin (DOE, 2019a). Table

8 L1-2 provides information on recorded seismic events by county including the earliest event, the

9 latest event and the magnitudes of the smallest and largest events recorded.

10 L1-4 Hydrology Updates Since 2009

11 L1-4a Optimization of Culebra Monitoring Well Network

12 Kuhlman (2010) revised a Culebra well-network minimization and optimization study initially performed by McKenna (2004) under analysis plan (AP) 111, Analysis Plan for Optimization and 13 Minimization of the Culebra Monitoring Network for the WIPP, developed by Beauheim and 14 McKenna (2003). The results of this optimization study are used to provide a quantitative 15 measure of the relative importance of steel-cased monitoring wells to the long-term Culebra 16 monitoring network. This study used the 100 input parameter fields (i.e., transmissivity or T 17 fields) developed for the CRA-2009 Performance Assessment Baseline Calculation (PABC) to 18 identify the locations where head and transmissivity data from new wells might cause the 19 greatest uncertainty reduction. The study indicated uncertainty in Culebra groundwater travel 20 times calculated from a point above the center of the WIPP disposal panels to the WIPP Land 21 Withdrawal Boundary (LWB). Kuhlman (2010) used three methods to determine the value of an 22 existing well or potential well location. The three metrics were combined to create maps showing 23 the relative value of additional head data at points throughout the modeling domain, see Figure 24 L1-2. 25

- 26 The three metrics were:
- reduction of freshwater head kriging variance,
- optimization of the shape of triangles drawn between the wells for estimating head
 gradients (i.e., equilateral triangles are better than obtuse triangles), and
- identification of areas where more head data in the model (i.e., from a new Culebra monitoring well) would likely have the largest positive impact on constraining modelpredicted travel times.
- 33 These three different monitoring network assessment approaches were combined to rank:
- possible locations for new wells and
- importance of replacement (rather than simple abandonment) for existing steel-cased
 well locations.

1 Since the Kuhlman (2010) report was prepared, well WIPP-25, shown in Figure L1-2 has been

2 plugged and abandoned (without replacement), and wells H-9c, H-4b, H-11b4, AEC-7, H-5b, H-

3 10c, H-12, and WIPP-11 have been plugged and replaced with fiberglass-cased monitoring

4 wells. The condition of individual steel wells, as observed with downhole video monitoring, is a

5 significant factor in the selection of replacement wells; the results of this optimization study are

6 considered as an additional source of information for decision-making.

7 L1-4b Geochemical Analysis

8 Domski et al. (2011) presented geochemical analysis of waters from WIPP wells completed

above the Salado, focusing on groundwaters from the Rustler, the Dewey Lake, and the Santa

10 Rosa. The study included only new or historic samples from the Culebra, which were not included

in the previous Culebra-specific geochemical study of Domski and Beauheim (2008).

Domski et al. (2011) applied a similar methodology as Domski and Beauheim (2008), in which

chemical species observed in water quality samples were used to categorize geochemical

facies. The spatial coverage of wells in these other formations is much less than well coverage in

the Culebra, making it difficult to draw conclusions regarding the spatial distribution of geochemical facies, as was done for the Culebra in Domski and Beauheim (2008).

_ . . . _

17 Samples from the Dewey Lake generally had low ionic strength and had more significant sulfatic

18 weathering components, related to the presence of gypsum-filled fractures in the Dewey Lake.

19 Samples from Santa Rosa wells were consistent with waters of meteoric origin, indicative of their

20 relatively shallow occurrence.

Samples from the Magenta Member of the Rustler (Magenta) generally were from the diagenetic 21 facies in eastern wells near the Rustler mudstone-halite margins. Furthest to the west, Magenta 22 wells belonged exclusively to the sulfatic weathered facies. Wells centrally located within the 23 WIPP site boundaries are likely the product of mixing between the sulfatic weathering 24 composition to the west and the diagenetic waters in the east. Samples used in Domski et al. 25 (2011) from the Culebra were mostly from the southeastern arm of Nash Draw and in 26 replacement wells drilled recently at the WIPP site. More recent and historic Culebra water 27 quality analyses generally agreed with Domski and Beauhiem (2008), adding detail to the 28 distribution of facies in the southeastern arm of Nash Draw. Samples from the Rustler-Salado 29 contact are in general quite briney. East of Nash Draw, the formation contains magnesium-rich 30 brines, which are believed to be diagenetic in origin, while wells in and closer to Nash Draw show 31

³² effects of halite dissolution in the underlying Salado.

Figure L1-3 shows the average composition of water quality samples collected above the 33 Salado. The "Culebra" bar is the average composition for the few Culebra samples in Domski et 34 al. (2011), while the "Culebra AP-125" bar represents the average of a much larger sample taken 35 from Domski and Beauheim (2008). This figure clearly summarizes the difference in composition 36 between samples collected from the Santa Rosa and Dewey Lake, compared to samples from 37 the Rustler. Magenta compositions are very similar to Culebra compositions. Culebra average 38 ionic strength is greater in the larger, more representative AP-125 dataset compared to the 39 smaller dataset analyzed by Domski et al. (2011). 40

Figure L1-4 summarizes the relationship between ionic strength, geologic formation, and east-

42 west location of wells completed above the Salado at the WIPP. Ionic strength varies across

43 more than three orders of magnitude between the Santa Rosa and the Los Medaños Member of

the Rustler (Los Medaños). Regional groundwater chemistry undergoes radical changes over 1 2 relatively short vertical distances, driven largely by proximity to the Salado. In the Rustler, waters tend to increase in ionic strength to the east, due to proximity to the mudstone-halite margins 3 within the Rustler (Domski and Beauheim, 2008). Santa Rosa and Dewey Lake waters do not 4 appear to follow a similar trend of increasing ionic strength to the east, likely because of their 5 more direct vertical recharge path from precipitation (Domski et al., 2011). The sole Dewey Lake 6 7 sample with high ionic strength is associated with potash mine tailings contamination (SNL-1) and is not representative of the Dewey Lake in general. 8

Geochemical analysis of groundwater samples collected from formations above the Salado
 (Domski et al., 2011) agrees with previous analyses conducted on the Culebra (Domski and
 Beauheim, 2008). These studies reveal how the geochemistry of the Culebra and Magenta fit
 into regional groundwater trends, both vertically and horizontally. This information is supportive of
 the general conceptual model for groundwater recharge of shallow formations near the WIPP
 site.

Two radiokrypton analyses of the groundwater were performed in the 2014 – 2016 timeframe to 15 complement the Culebra aquifer flow model and to better understand solute transport at the 16 WIPP site in accordance with Test Plan (TP) 14-01 (Kuhlman, 2014). The distribution of 17 groundwater age at the WIPP site can give valuable information regarding transit time in the 18 flow-regime. Data requirements for chemical isotope analysis are independent of many of the 19 physical factors required in flow modeling. Instead, chemical isotope analysis uses concentration 20 of radioactive or radiogenic isotopes and the rate isotopes decay or accumulate to calculate 21 groundwater age, data which are not generally considered in groundwater flow modeling (Bethke 22 and Johnson, 2008). Combining the two approaches has the potential to refine the current 23 understanding of transport in the Culebra aquifer. 24

The Krypton (**Kr**) model age was substantially higher than the flow model prediction of hydraulic age, which was interpreted as a constraint on the effective diffusivity of Kr⁸¹ in stagnant pore fluids of aquitard formations adjacent to the Culebra flow zone. Values of effective diffusivity of Kr in the stagnant zone were calculated based on the flow model predicted travel times and were constrained to 1.4×10^{-5} square meters per year (**m**²/yr) to 4.7×10^{-6} m²/yr. The low values were interpreted to imply that there is low interconnected porosity in aquitard formations and/or Kr diffusivity is slowed by adsorption or salinity effects.

Sturchio (2016) and Sturchio et al. (2014) presented the results of radiokrypton analyses of three 32 additional Culebra wells (AEC-7R, H-12R, and SNL-16). Wells AEC-7R and H-12R are in low-33 transmissivity zones of the Culebra, while SNL-16 is in a high-transmissivity zone in Nash Draw 34 (see Figure L1-1). Water samples from SNL-16 had a Kr⁸¹ sample to air ratio indistinguishable 35 from modern atmospheric Kr. Water samples from the low-transmissivity wells have low Kr⁸¹ 36 compared to modern atmosphere (0.58 sample to air ratio at AEC-7R and 0.49 sample to air 37 ratio at H-12R), indicating long groundwater residence times of thousands of years. Sturchio 38 (2016) used the calculation methods from Sturchio et al. (2014) to correct for the modern Kr 39 component based on Kr⁸⁵ concentration and the effective diffusivity in the aguitard. Figure L1-1 40 shows the corrected mean residence times of Culebra groundwater at the wells sampled from 41 both studies. The mean residence time in low-transmissivity wells SNL-14 and SNL-16 were 42 approximately 31,000 years and <17,000 years, respectively, while the residence times in low-43 transmissivity wells AEC-7, H-12R, and SNL-8 were approximately 48,000 years, 66,000 years, 44 45 and 79,000 years, respectively.

1 These radiokrypton studies show that Kr measurements can be applied to saline aquifers if the

- 2 effects of diffusive exchange, adsorption, and salinity gradient effects are considered. For the
- 3 Culebra, sufficient information on the hydrogeology exists to apply these complicating factors to
- 4 radiokrypton analyses to yield useful constraints on groundwater age and/or the effective
- 5 diffusivity of the confining units surrounding the Culebra. Radiokrypton analyses may provide a
- 6 complimentary approach to far-field radionuclide transport questions at the WIPP site.

7 L1-4c Steel-Cased Well Reconfiguration and Replacement

- 8 From the 1970s through 1994, groundwater wells drilled for the WIPP site used steel well casing.
- 9 Exposure to natural groundwaters, which are of high salinity, has caused the steel casings to
- corrode and deteriorate, necessitating the plugging and abandonment of many wells. During the
- peak of testing in the Culebra, many well pads had multiple Culebra wells within 50 m of one another. While this well density was necessary for evaluating the hydrologic characteristics of
- the Culebra and other formations of interest, they are not needed for long-term monitoring of
- qroundwater levels in the Culebra. Consequently, some of the Culebra wells located on the same
- well pad were plugged and abandoned. An adequate Culebra monitoring network was
- established through geospatial analysis. The network provides sufficient spatial coverage for
- 17 Culebra monitoring and allows for either the replacement of or the removal of the remaining
- 18 steel-cased monitoring wells as they deteriorate.
- 19 From 2008 to 2011, two steel-cased wells have been plugged and abandoned without
- replacement (WIPP-25 and WIPP-30, see Table L1-1). Well AEC-7 was re-perforated across the
- Culebra in 2008 (DOE, 2009b, 2009c). Three multiple-completion wells have been permanently
- recompleted to monitor individual formations (H-15, H-16 and H-9c). H-9c was re-drilled in 2010;
- its replacement is named H-9bR. Five replacement wells were drilled and completed with
- fiberglass-reinforced plastic casings (H-6bR, H-15R, H-4bR, H-9bR, and H-11b4R).
- ²⁵ From 2013 to 2017, three steel-cased wells have been plugged and abandoned (AEC-7, H-12,
- and H10c, see Table L1-1) and replaced with fiberglass-reinforced plastic casings (AEC-7R, H-
- 12R, and H-10cR). In H-series wells up to H-11 (drilled by the U.S. Geological Survey in the
- 1970s), a, b, and c suffixes originally referred to Magenta, Culebra, and Rustler-Salado contact
- 29 completions, respectively. Well maintenance was conducted in May 2017 to repair the protective
- ³⁰ surface casing on WIPP-19 after it was damaged.
- In 2019, two wells were plugged and abandoned (H-5b and WIPP-11) and replaced with fiberglass reinforced plastic casing (H-5bR and WIPP-11R).

33 L1-4d Culebra Monitoring

Water-level monitoring provides a general picture of the changes in hydraulic head occurring in the formations being monitored. Water levels are currently being monitored in the Culebra and Magenta, the Dewey Lake, and the Bell Canyon Formation (**Bell Canyon**). The monitored well locations are shown in Figure L1-5. Reconfigured or plugged and abandoned wells are listed in Table L1-1 and Table L1-3.

- In addition to monitoring Culebra water levels, the U.S. Department of Energy (**DOE**) monitors
- the fluid pressure in many wells with downhole pressure transducers. The history of Culebra
- 41 wells instrumented with downhole pressure transducers is given in Figure L1-6. This figure
- shows the periods of time from January 2003 to the present during which pressure transducers

1 were installed in Culebra wells. The continuous fluid-pressure measurements made using

2 pressure transducers provide a clearer, more complete record of the changes in hydraulic head

3 occurring in the wells than is provided by manual monthly water-level measurements alone.

4 Currently, 38 Culebra wells are monitored with downhole pressure transducers. Of the wells that

5 were monitored at one time, three wells shifted monitoring to a replacement well upon re-drilling

6 (AEC-7, H-12, and H10c).

7 Groundwater density calculations are carried out under Activity/Project Specific Procedure SP 9-

8 11, Calculation of Densities for Groundwater in WIPP Wells (Johnson, 2015b). Pressure

9 transducers are installed at mid-formation, which allows the combination of observed pressure,

installation depth, and water-level elevation measurements to yield an estimate of fluid density,

see Figure L1-6. Culebra groundwater density, in terms of specific gravity, varies from 1.0 (fresh

12 water) in the southeastern arm of Nash Draw (e.g., H-7b1), to values greater than 1.0 in wells

SNL-6 and SNL-15. This procedure has been applied to both current years and historical data to
 produce estimates of fluid densities in wells from 2012 through 2016 (Johnson, 2013, 2014,

produce estimates of fluid densities in wells from 2012 through 2016 (Johnson, 2013, 2014,
 2015a, 2016, 2017). This approach was used to compute prior Culebra groundwater densities to

estimate freshwater heads (Johnson 2008, 2009).

¹⁷ Figure L1-7 shows water levels from wells north of the WIPP site that generally correspond with

one another. The responses correspond to seasonal rainfall events and may also capture longer

drought cycles. Monthly precipitation data for the Carlsbad Airport from 2010 through 2017 is

20 presented with the water level data in Figure L1-7 (National Oceanic and Atmospheric

Administration National Climate Data Center http://www.ncdc.noaa.gov/cdo-web/). A water level

rise in 2010 was followed by general decline until the end of 2014, when water levels rose, but

did not return to previously observed peak levels and have generally leveled off. Responses

observed in SNL-2, SNL-18, and SNL-19 (located on the eastern edge of Nash Draw) appear to precede those in other wells, in which responses tend to be delayed. This supports the current

precede those in other wells, in which responses tend to be delayed. This supports the current view that precipitation effects in the Culebra progress laterally through the formation, not

vertically through overlying strata.

Figure L1-8 shows water levels from Culebra wells in the central portion of the WIPP site. The 28 water level trends in these wells mostly parallel one another, and show a stronger response to 29 the commercial pumping affecting the Culebra aquifer than wells in the north central portion of 30 the WIPP site. Water levels in these wells dropped approximately 12 m between 2013 and the 31 end of 2016. Water levels began to increase during 2016 before decreasing again in late 2016. 32 Water levels then began recovering mid-2017 through December 31, 2017. Previous to the new 33 pumping event, wells in the central portion of the WIPP site had smaller water fluctuations than 34 northern wells (DOE 2014). Any response to annual sampling events in the WIPP Water Quality 35 Sampling Program wells is muted in water level and pressure transducer data after the new 36 commercial pumping events. 37

The primary event that has impacted Culebra water levels and pressures is pumping at a

³⁹ privately-owned well, located southwest of the LWB (Thomas et al., 2017). Pumping began in

40 September 2013 and continued until mid-January 2017. Water levels in many Culebra wells

41 were impacted by these pumping activities.

The Permittees report flow rate and direction in the Culebra annually as required by Permit Part 5,

43 Section 5.8.

1 L1-4e Magenta Monitoring

Magenta water levels were monitored during the period 2012 through 2019. Overall, water levels in Magenta wells were not disrupted by sampling, purging events, or hydraulic testing. Unlike the Culebra wells, Magenta wells do not respond to pumping at the private well. Water levels in the Magenta do not show responses to major rainfall events, thus precipitation effects seen in the Culebra are derived from a lateral source (where the Culebra outcrops in Nash Draw), rather than vertical recharge closer to the WIPP site. These observations support the assertion that there is no natural communication between the Magenta and the Culebra.

9 L1-4f Dewey Lake Monitoring

The DOE monitors Dewey Lake water levels in one well, WQSP-6A. Figure L1-9 shows a time series of Dewey Lake water levels in WQSP-6A from 2012 through 2017. The hydrograph shows that water levels were stable within an approximately 50-centimeter (**cm**) band over that period, with a slightly increasing downward trend until the latter half of 2016. The slight water level increase at the end of 2016 is most likely a response to rain events.

15 L1-4g Bell Canyon Monitoring

16 Bell Canyon monitoring wells are situated at the northern (DOE-2) and southern (Cabin Baby

17 [CB]-1) edges of the WIPP LWB. The primary purpose of this monitoring is to determine if oil and

gas activities in the Bell Canyon are affecting the hydraulic head of the Bell Canyon at the WIPP

site. Water level elevations are plotted for the period 2012 through 2017 in Figure L1-10.

20 L1-5 Hydrology Summary and Conclusions

Water-level monitoring provides a general picture of the changes in hydraulic head occurring in 21 the formations being monitored. Water levels are currently being monitored in the Culebra, 22 Magenta, Dewey Lake, and Bell Canyon. Culebra water fluctuations are generally caused by 23 either precipitation events propagating laterally from Nash Draw or pumping from a private well 24 south of the WIPP site. Pumping from the private well affected Culebra wells from the north 25 central portion of the WIPP site to wells located south of the LWB. Water levels in the Magenta 26 did not respond to pumping at the private well. Five wells in the Magenta did experience a rapid 27 rise in water level that is not yet understood. Water levels in the other Magenta wells are 28 generally stable or recovering from earlier pumping tests. The Dewey Lake water level 29 (measured only in well WQSP-6A) was stable within an approximately 50 cm band over the last 30 5-year period. Bell Canyon water levels were stable in DOE-2 and rose steadily in CB-1 since 31 being bailed in 2008. 32

In addition to monitoring water levels, fluid pressures in most Culebra, Magenta, and Bell Canyon wells are monitored on an hourly basis using downhole pressure transducers. The highfrequency fluid-pressure measurements provide a clearer, more complete record of the changes in hydraulic head occurring in the wells than that provided by monthly water-level measurements alone. The high-frequency pressure transducer data shows detailed fluctuations due to both natural (barometric, earth tides, and precipitation) and man-made (potash mine collapse and oil well drilling) stimuli.

40 The WIPP groundwater-monitoring program has continued to augment monthly water-level

- using downhole programmable pressure gauges. Pressure transducer readings allow an 1
- enhanced view of the effects of individual pumping events from the private well and precipitation 2
- events in Nash Draw. The pumping at the private well south of the LWB affected wells as far 3
- north as WIPP-19. 4
- A combination of pressure and depth-to-water measurements are used to estimate fluid density 5
- in Culebra wells at the WIPP site. These densities are then used to compute equivalent 6
- freshwater heads, which are combined with an averaged version of the WIPP repository 7
- performance assessment model to produce contour maps of piezometric head in the Culebra for 8
- inclusion in the WIPP Project Annual Site Environmental Report. 9
- The nature of groundwater in the Rustler, specifically the Culebra, has been studied in detail for 10
- several decades at the WIPP site. This long history of research and investigation now serves as 11
- a firm basis for long-term monitoring of groundwater in formations surrounding the WIPP site. 12
- Effects of nearby anthropogenic activities may be seen in the WIPP monitoring network. 13
- Maintenance of the current network and investigation of observed anomalies ensure confidence 14
- in the understanding of regional groundwater in relation to the WIPP site. 15

L1-6 References 16

- Beauheim, R.L., and S.A. McKenna. 2003. Analysis Plan AP-111: Analysis Plan for 17
- Optimization and Minimization of the Culebra Monitoring Network for the WIPP. ERMS 533092. 18
- Carlsbad, NM: Sandia National Laboratories. 19
- Bethke, C.M., and T.M. Johnson. 2008. Groundwater Age and Groundwater Age Dating. Annu. 20 Rev. Earth Planet Science, vol. 36: 121-152. 21
- Domski, P.S., R.L. Beauheim, and P.B. Johnson. 2011. AP-147 Analysis Report: Evaluation of 22 WIPP Groundwater Compositions. ERMS 556581. Carlsbad, NM: Sandia National 23 Laboratories. 24
- Domski, P.S., and R.L. Beauheim. 2008. Evaluation of Culebra Brine Chemistry. AP-125. 25 ERMS 549336. Carlsbad, NM: Sandia National Laboratories. 26
- 27 Johnson, P.B. 2008. Routine Calculations Report in Support of Task 6 of AP-114: 2007 Calculated Densities for Use in Deriving Equivalent Freshwater Heads of the Culebra Dolomite 28 Member of the Rustler Formation near the WIPP Site, May 2007. Carlsbad, NM: Sandia National 29
- Laboratories, ERMS 548127. 30
- Johnson, P.B. 2009. Routine Calculations Report in Support of Task 6 of AP-114: 2008 31
- Calculated Densities for Use in Deriving Equivalent Freshwater Heads of the Culebra Dolomite 32
- Member of the Rustler Formation near the WIPP Site. Carlsbad, NM: Sandia National 33
- Laboratories. ERMS 550755. 34
- Johnson, P.B. 2013. Memo to Records Center (Subject: 2012 Calculated Densities). February, 35 11, 2013. Carlsbad, NM: Sandia National Laboratories. ERMS 559277. 36
- Johnson, P.B. 2014. Memo to Records Center (Subject: 2013 Calculated Densities). February 6, 37
- 2014. Carlsbad, NM: Sandia National Laboratories. ERMS 561659. 38

- Johnson, P.B. 2015a. Memo to Records Center (Subject: 2014 Calculated Densities). February 1 17, 2015. Carlsbad, NM: Sandia National Laboratories. ERMS 563343. 2
- Johnson, P.B. 2015b. Activity/Project Specific Procedure SP 9-11, Calculation of Densities for 3 Groundwater in WIPP Wells Revision 3. Carlsbad, NM: Sandia National Laboratories. ERMS 4 565218. 5
- Johnson, P.B. 2016. Memo to Records Center (Subject: 2015 Calculated Densities). February 6 23, 2016. Carlsbad, NM: Sandia National Laboratories. ERMS 565652. 7
- Johnson, P.B. 2017. Memo to Records Center (Subject: 2016 Calculated Densities). March 6. 8 2017. Carlsbad, NM: Sandia National Laboratories. ERMS 567889. 9
- Kuhlman, K.L. 2010. Analysis Report AP-111 Revision 1, Culebra Water Level Monitoring 10 Network Design. ERMS 554054. Carlsbad, NM: Sandia National Laboratories. 11
- Kuhlman, K.L. 2014. Test Plan TP 14-01: Test Plan for Age Dating Sampling at the WIPP Site. 12 Carlsbad, NM: Sandia National Laboratories. ERMS 561690. 13
- McKenna, S.A. 2004. Analysis Report: AP-111, Culebra Water Level Monitoring Network 14 Design. AP-111. ERMS 540477. Carlsbad, NM: Sandia National Laboratories. 15
- New Mexico Institute of Mining and Technology (NMIMT). 2018. A Report on the Seismicity of 16 the WIPP Site for the Period July 1, 2018 through September 30, 2018. Socorro, New Mexico. 17
- New Mexico Institute of Mining and Technology (NMIMT). 2019a. A Report on the Seismicity of 18 the WIPP Site for the Period October 1, 2018 through December 31, 2018. Socorro, New 19 Mexico. 20
- New Mexico Institute of Mining and Technology (NMIMT). 2019b. A Report on the Seismicity of 21
- the WIPP Site for the Period January 1, 2019 through March 31, 2019. Socorro, New Mexico. 22
- New Mexico Institute of Mining and Technology (NMIMT). 2019c. A Report on the Seismicity of 23 the WIPP Site for the Period April 1, 2019 through June 30, 2019. Socorro, New Mexico. 24
- Schuhen, M.D. 2011. WIPP WGS-1 Laboratory Notebook, WIPP Geologic Samples. ERMS 25 555594. Carlsbad, NM: Sandia National Laboratories. 26
- Sturchio, N.C., K.L. Kuhlman, R. Yokochi, P.C. Probst, W. Jiang, L. Zheng-Tian, P. Mueller, and 27 Y. Guo-Min. 2014. Krypton-81 in Groundwater of the Culebra Dolomite near the Waste Isolation 28
- Pilot Plant, New Mexico. Journal of Contaminant Hydrology, vol. 160: 12-20. 29
- Sturchio, N.C. 2016. Results of Radiokrypton Analyses of Monitoring Wells AEC-7R, H-12R, and 30
- SNL-16 Near the Waste Isolation Pilot Plant, New Mexico. Carlsbad, NM: Sandia National 31
- Laboratories. ERMS 566236. 32
- Thomas M.A., K.L. Kuhlman, and A.L. Ward. 2017. Anthropogenic influences on groundwater in 33 34

U.S. Department of Energy (DOE). 1996. Title 40 CFR Part 191 Compliance Certification

- Application for the Waste Isolation Pilot Plant. Carlsbad, NM: U.S. Department of Energy.
 DOE/CAO-1996-2184.
- 4 U.S. Department of Energy (DOE). 2009a. Waste Isolation Pilot Plant Hazardous Waste
- 5 Facility Permit Renewal Application. September 2009. Carlsbad, NM: U.S. Department of 6 Energy.
- 7 U.S. Department of Energy (DOE). 2009b. Basic Data Report for Well Plugging and
- Abandonment, Reconfiguration, and New Well Drilling Activities for Fiscal Year 2008. DOE/WIPP
 08-3326. Carlsbad, NM: U.S. Department of Energy.
- U.S. Department of Energy (DOE). 2009c. Waste Isolation Pilot Plant Annual Site
- Environmental Report for 2008. DOE/WIPP 09-2225. Carlsbad, NM: U.S. Department of Energy.
- U.S. Department of Energy (DOE). 2014. Title 40 CFR Part 191 Subparts B and C. Compliance
 Recertification Application for the Waste Isolation Pilot Plant. Carlsbad, NM: US Department of
 Energy Carlsbad Field Office. DOE/WIPP-14-3503.
- 15 Energy Carlsbad Field Office. DOE/WIPP-14-3503.
- U.S. Department of Energy (DOE). 2016a. Basic Data Report for Drill Hole AEC-7R (C-3635).
 Carlsbad, NM: U.S. Department of Energy. DOE/WIPP-16-3567.
- U.S. Department of Energy (DOE). 2016b. Basic Data Report for Drill Hole H-12R (C-3749 POD 1). Carlsbad, NM: U.S. Department of Energy. DOE/WIPP-16-3559.
- U.S. Department of Energy (DOE). 2019a. Delaware Basin Monitoring Annual Report. Carlsbad,
 NM: U.S. Department of Energy. DOE/WIPP-19-2308.
- U.S. Department of Energy (DOE). 2019b. Title 40 CFR Part 191 Subparts B and C. Compliance
- 23 Recertification Application for the Waste Isolation Pilot Plant. Carlsbad, NM: US Department of
- Energy Carlsbad Field Office. DOE/WIPP-19-3609.
- 25

TABLES

Table L1-1Culebra Wells Plugged, Abandoned, Replaced, or Repaired (2013 – 2019)

Well	Activity	Date of Activity
AEC-7	Plugged and abandoned, Culebra well replaced by AEC-7R	August 2013
H-12	Plugged and abandoned, Culebra well replaced by H-12R	August 2014
H-10c	Plugged and abandoned, Culebra well replaced by H-10cR	October 2015
WIPP-19	Surface Casing Repaired	May 2017
H-5b	Plugged and abandoned, Culebra well replaced by H-5bR	September 2019
WIPP-11	Plugged and abandoned, Culebra well replaced by WIPP-11R	September 2019

3 Reference: Updated/modified from DOE. 2019b.

Table L1-2 Seismic Activity in the Delaware Basin (1926 – 2019)

No. of Total Events	Earliest Event	Latest Event	Smallest Magnitude	Largest Magnitude
98	7/06/1983	4/07/2018	1.10	3.80
1,849	3/06/1962	7/12/2019	0.35	3.50
380	7/17/1926	3/29/2019	0.09	4.00
84	8/16/1931	11/13/2018	0.59	4.00
84	9/19/1976	3/15/2019	0.20	3.10
47	2/4/1976	3/26/2019	0.66	1.80
337	1/30/1975	3/29/2019	0.70	3.20
1,345	2/19/1976	3/31/2019	0.87	3.20
222	8/05/1976	3/31/2019	0.08	3.60
71	8/14/1964	1/14/2019	0.86	3.80
4,517				
,				
as a æs dge	a rumble furniture; can br es heavy objects		a rumble furniture; can break dishes es heavy objects; cracks walls	a rumble furniture; can break dishes es heavy objects; cracks walls

6.0 to 6.9 Considerable damage to buildings

7.0 to 7.3 Major damage to buildings; breaks underground pipes

7.4 to 7.9 Great damage; destroys masonry and frame buildings

Above 8.0 Complete destruction; ground moves in waves

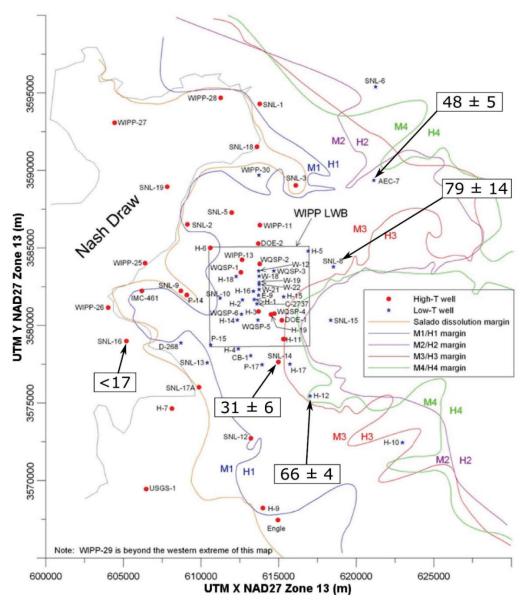
Reference: DOE. 2019a.

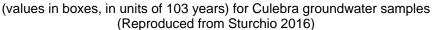
Table L1-3Wells Plugged, Abandoned, and/or Reconfigured (2008 – 2012)

Well	Interval(s) Previously Monitored	Activity	Date of Activity	Current Interval Monitored
WIPP-30	Culebra and Magenta	Plugged and abandoned	February 2008	—
H-6b	Culebra	Plugged and abandoned, Culebra well replaced by H-6bR	February 2008	—
AEC-7	Culebra	Scraped and reperforated	March 2008	Culebra
H-15	Culebra and Magenta	Plugback and reconfigured, Culebra well replaced by H-15R	March 2008	Magenta
H-16	Forty-niner, Magenta, Tamarisk, Culebra, and Los Medaños	Reconfigured from multicompletion open-hole Rustler to screened Culebra	July 2008	Culebra
WIPP-25	Culebra and Magenta	Plugged and abandoned	June 2009	_
H-4b	Culebra	Plugged and abandoned, Culebra well replaced by H-4bR	July 2009	—
H-9c	Culebra and Magenta	Plugback, Culebra well replaced by H- 9bR	September 2010	Magenta
H-11b4	Culebra	Plugged and abandoned, Culebra well replaced by H-11b4R	November 2011	—

3 Reference: DOE. 2014.

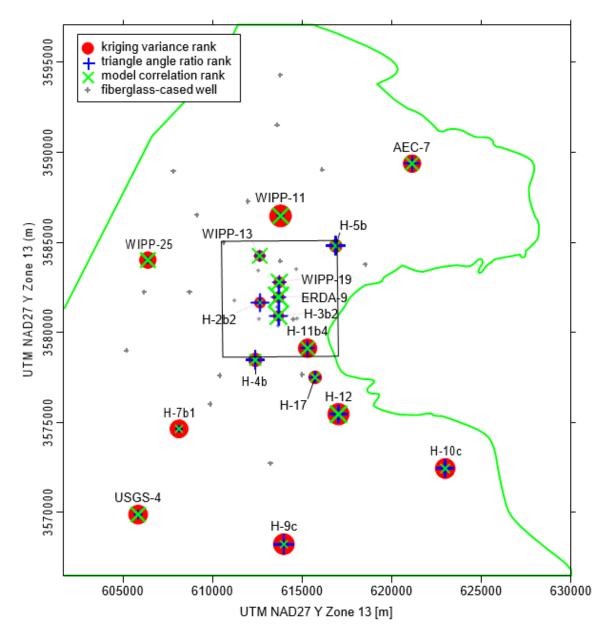
FIGURES





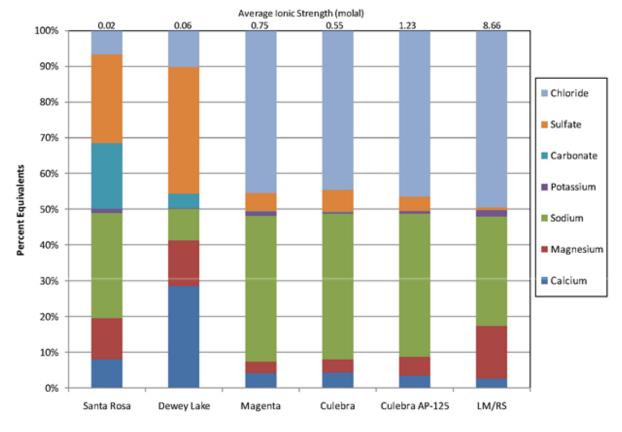
Also shown are Rustler Formation halite margins, the Salado Formation dissolution margin, and Nash Draw

Figure L1-1 Map of WIPP Area Showing Diffusion Corrected Kr-81 Age Reference: DOE. 2019b.



(Each of the red, green and blue symbol sizes corresponds to the relative rank of the metric at that well. The green curve is the active portion of the CRA-2009 PABC Culebra groundwater flow model; the black square is the WIPP Land Withdrawal Area Boundary.)

Figure L1-2 Ranking of Steel-cased Well Locations with Three Metrics Reference: DOE. 2014.



(LM/RS indicates the Los Medaños or Rustler-Salado Contact Formation)

Figure L1-3 Average Water Composition and Ionic Strength for Water Quality Samples Taken from Geologic Units above the Salado Formation

Reference: DOE. 2014.

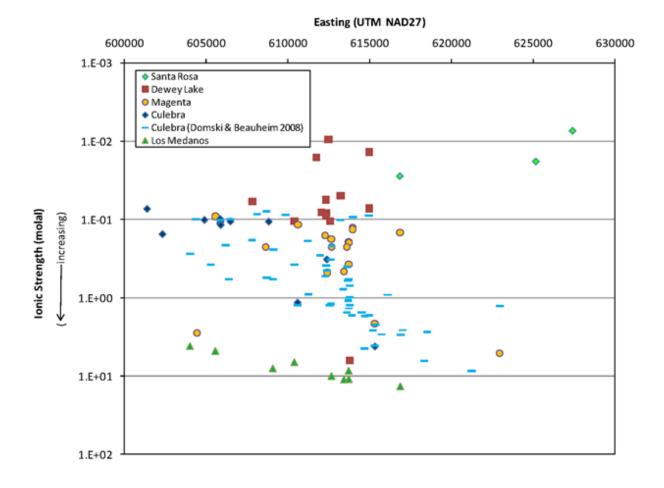


Figure L1-4 Ionic Strength versus UTM Easting Coordinate for Water Quality Samples from Wells above the Salado Formation

Reference: DOE. 2014.

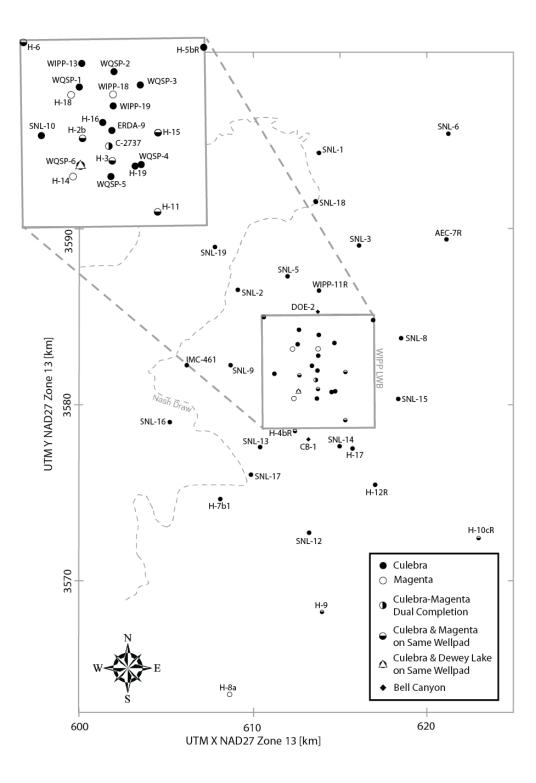


Figure L1-5 Locations of WIPP Wells and Wellpads

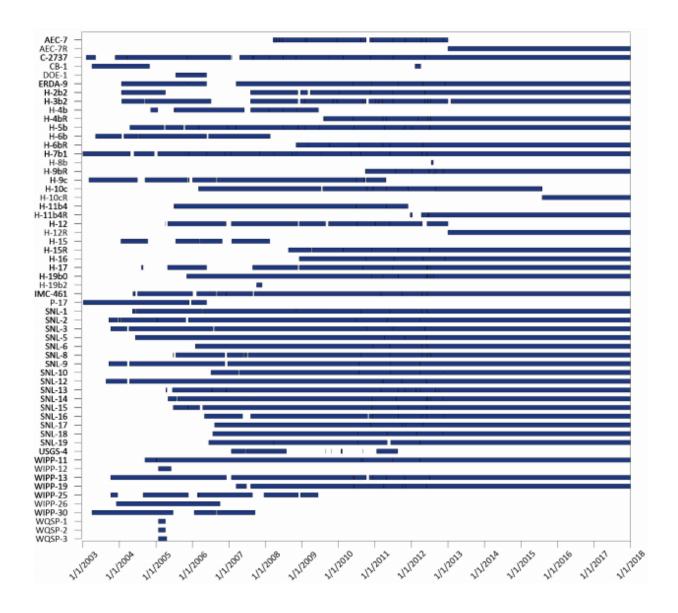


Figure L1-6 Culebra Well Downhole Pressure Transducer Data Coverage Reference: DOE. 2019b.

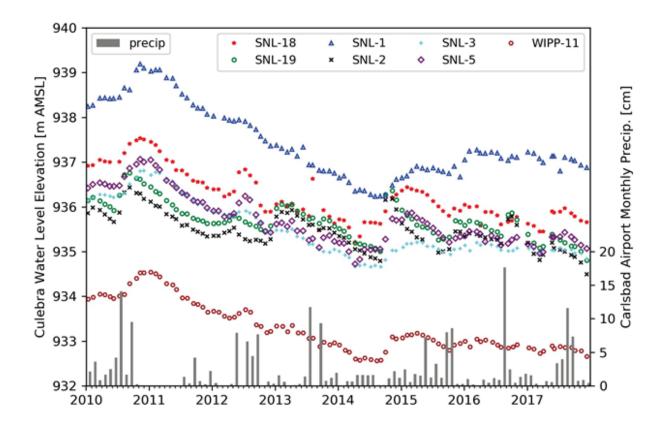


Figure L1-7 Water Levels in Culebra Wells North of the WIPP Site

Reference: DOE. 2019b.

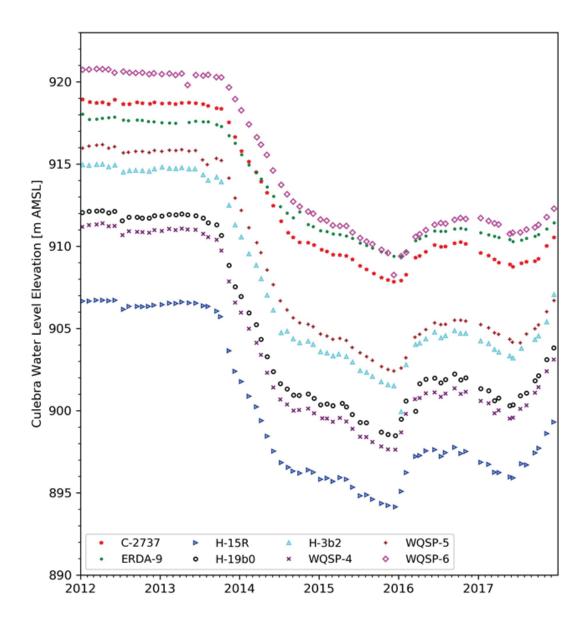


Figure L1-8 Water Levels in Culebra Wells in the Central Portion of the WIPP Site Reference: DOE. 2019b.

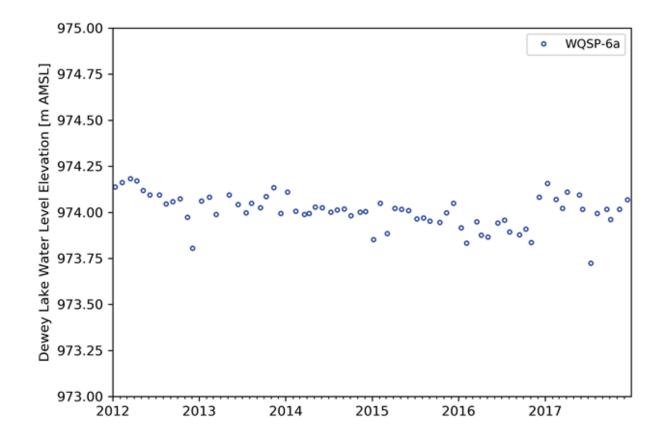


Figure L1-9 WQSP-6A Dewey Lake Water Levels

Reference: DOE. 2019b.

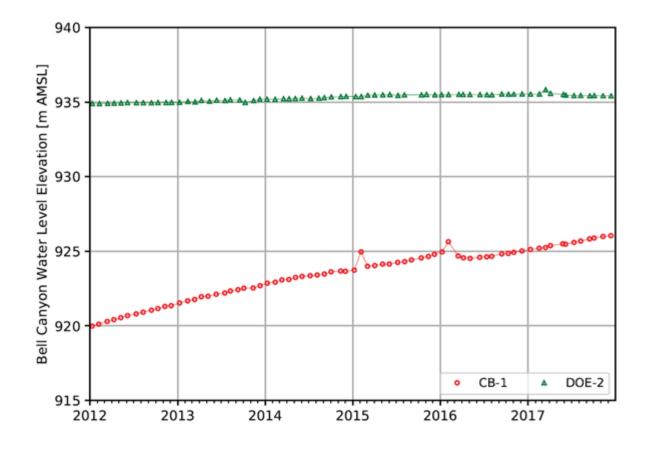


Figure L1-10 Bell Canyon Water Levels

1

ATTACHMENT M FIGURES

DISCLAIMER

The figures presented in this attachment are illustrations and are for information purposes only. These figures are not to scale.

ATTACHMENT M

FIGURES

LIST OF FIGURES

Figure M-1 Waste Handling Building Unit – TRU Mixed Waste Container Storage and Surge Areas	5
Figure M-2 Parking Area Unit – TRU Mixed Waste Container Storage and Surge Areas .	6
Figure M-3 Standard 55-Gallon Drum (Typical)	7
Figure M-4 Standard Waste Box	8
Figure M-5 Ten-Drum Overpack	9
Figure M-6 85-Gallon Drum	10
Figure M-7 100-Gallon Drum	11
Figure M-8 Typical Standard Large Box 2	12
Figure M-9 Facility Canister Assembly	13
Figure M-10 RH-TRU 72-B Canister Assembly	14
Figure M-11 Typical Shielded Container	15
Figure M-12 Waste Handling Building Plan (Ground Floor)	16
Figure M-13 RH Bay Ground Floor and Waste Transport Routes	17
Figure M-14 RH Hot Cell Storage Area	18
Figure M-15 RH Canister Transfer Cell Storage Area and Waste Transport Route	
Figure M-16 RH Facility Cask Loading Room and Cask Unloading Storage Area and Waste Transport Route	20
Figure M-17 TRUPACT-II Type B Shipping Container	21
Figure M-18 Typical HalfPACT Type B Shipping Container	
Figure M-19 Typical TRUPACT-III Type B Shipping Container	
Figure M-20 Payload Transfer Station	24
Figure M-21 Facility Pallet	25
Figure M-22 Typical Containment Pallet	
Figure M-23 Facility Transfer Vehicle, Facility Pallet, and Typical Pallet Stand	
Figure M-24 Typical Yard Transfer Vehicle	
Figure M-25 RH TRU 72-B Shipping Cask on Trailer	29
Figure M-26 CNS 10-160B Shipping Cask on Trailer	
Figure M-27 RH-TRU 72-B Type B Shipping Cask	31
Figure M-28 CNS 10-160B Type B Shipping Cask	

Figure M-29 RH Transura	anic Waste Facility Cask and Light Weight Facility Cask	33
Figure M-30 RH Shielded	Insert Assembly	34
Figure M-31 CNS 10-160	B Drum Carriage	35
Figure M-32 RH-TRU 72-	B Cask Transfer Car	
Figure M-33 CNS 10-160	B Cask Transfer Car	37
Figure M-34 RH Facility (Cask Transfer Car (Side View)	
Figure M-35 Transfer Cel	Il Shuttle Car	
Figure M-36 Facility Cash	Rotating Device	40
Figure M-37 TRUPACT-I	I Containers on Trailer	41
	y Surface and Underground CH Transuranic Mixed Waste gram	42
	y Surface and Underground CH Transuranic Mixed Waste gram (Continued)	43
	Underground RH Transuranic Mixed Waste Process Flow RU 72-B Shipping Cask	44
	Underground RH Transuranic Mixed Waste Process Flow 10-160B Shipping Cask	45
Figure M-42 Typical Disp	osal Panel	46
Figure M-43 Repository H	Horizon and Underground Waste Transport Routes	47
Figure M-44 Spatial View	of the Miscellaneous Unit and Waste Handling Facility	48
• •	Backfill Sacks Emplaced on Drum Stacks and Emplacement	49
Figure M-46 Waste Trans	sfer Cage to Transporter	50
Figure M-47 Push-Pull At	tachment to Forklift to Allow Handling of Waste Containers	51
Figure M-48 Typical RH a	and CH TRU Mixed Waste Container Disposal Configuration	52
Figure M-49 Underground	d Ventilation System Airflow	53
Figure M-50 Underground	d Ventilation System Airflow (with SVS)	54
Figure M-51 Typical Room	m Barricade	55
Figure M-52 Underground	d Ventilation System Airflow (with Building 416)	56
Figure M-53 Typical RH	Emplacement Equipment	57
Figure M-54 RH TRU Wa	ste Facility Cask Unloading from Waste Shaft Conveyance	58
•	orehole Showing the RH Shield Plug and Supplemental	59
	ation of the WIPP Facility	
-	c Flow Diagram	
-	c Flow Diagram with Building 416	

Figure	M-59 Typical CH Mixed Waste Transport Routes in Waste Handling Building -	
	Container Storage Unit	
Figure	M-60 WIPP Panel Closure Schedule	64
Figure	M-61 WIPP Facility Final Closure 84-Month Schedule	65
Figure	M-62 Typical Substantial Barrier and Bulkhead	66
Figure	M-63 Typical Shaft Sealing System	67
Figure	M-64 Perimeter Fenceline and Roadway	68
Figure	M-65 WIPP Facility Boundaries Showing 16-square-Mile Land Withdrawal Boundary	69
Figure	M-66 Site Geologic Column	70
Figure	M-67 Generalized Stratigraphic Cross Section above the Bell Canyon Formation at the WIPP Site	71
Figure	M-68 Culebra Freshwater-Head Potentiometric Surface	72
Figure	M-69 Detection Monitoring Well Locations	73
Figure	M-70 As-Built Configuration of Well WQSP-1	74
Figure	M-71 As-Built Configuration of Well WQSP-2	75
Figure	M-72 As-Built Configuration of Well WQSP-3	76
Figure	M-73 As-Built Configuration of Well WQSP-4	77
Figure	M-74 As-Built Configuration of Well WQSP-5	78
Figure	M-75 As-Built Configuration of Well WQSP-6	79
Figure	M-76 Groundwater Level Surveillance Wells (inset represents the Groundwater Level Surveillance Wells within the WIPP Land Withdrawal Area)	80
Figure	M-77 Repository VOC Monitoring Locations	81
Figure	M-78 Typical Disposal Room VOC Monitoring Locations	82
Figure	M-79 Disposal Room Sample Head Arrangement	83
Figure	M-80 VOC Monitoring System Design	84
Figure	M-81 VOC Monitoring System Design (continued)	85

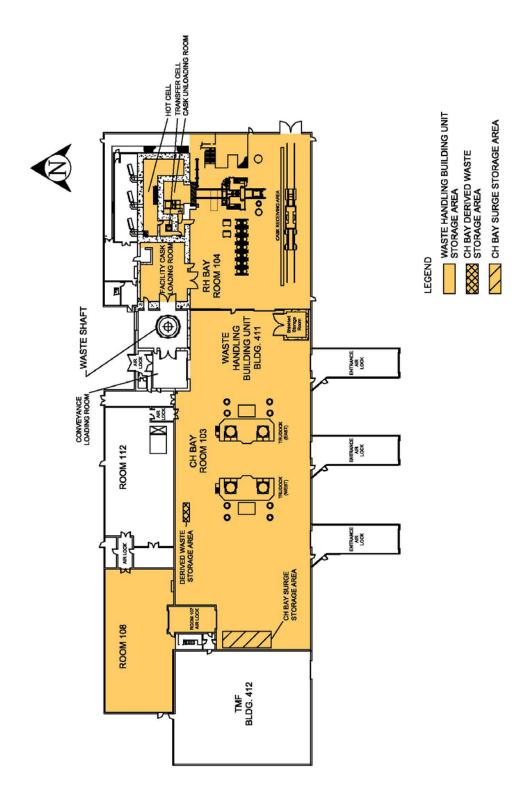


Figure M-1 Waste Handling Building Unit – TRU Mixed Waste Container Storage and Surge Areas

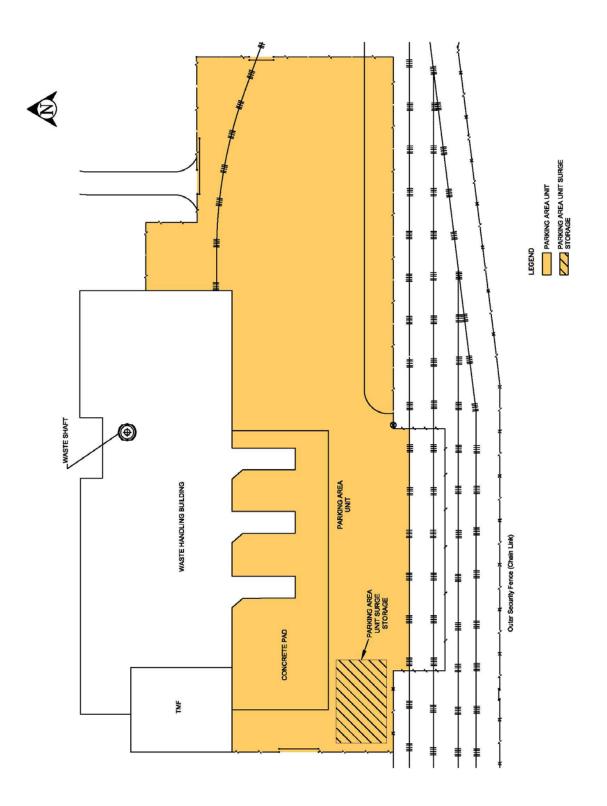


Figure M-2 Parking Area Unit – TRU Mixed Waste Container Storage and Surge Areas

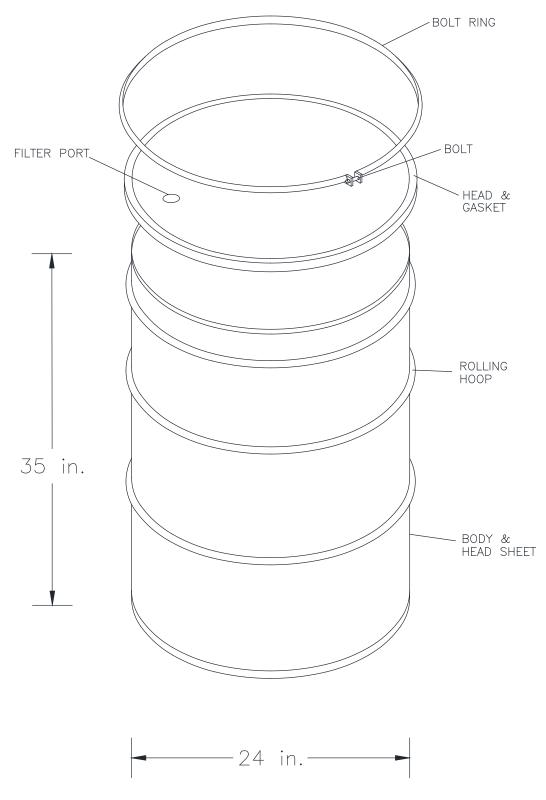


Figure M-3 Standard 55-Gallon Drum (Typical)

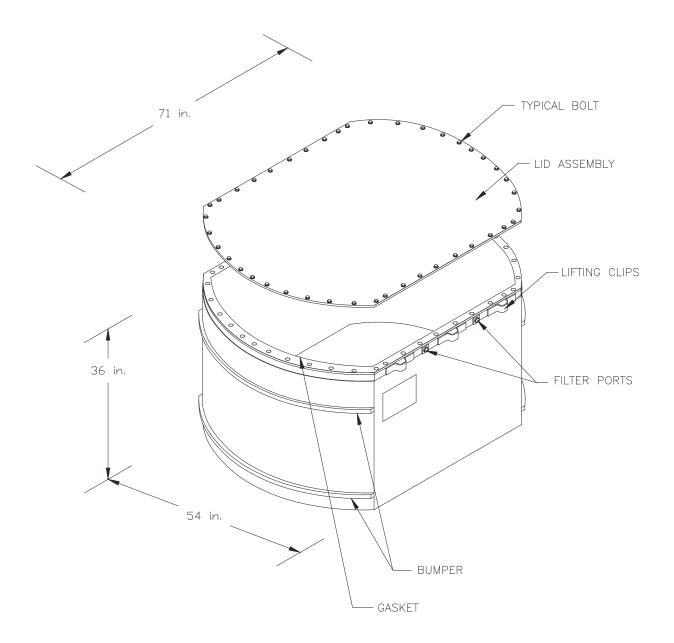


Figure M-4 Standard Waste Box

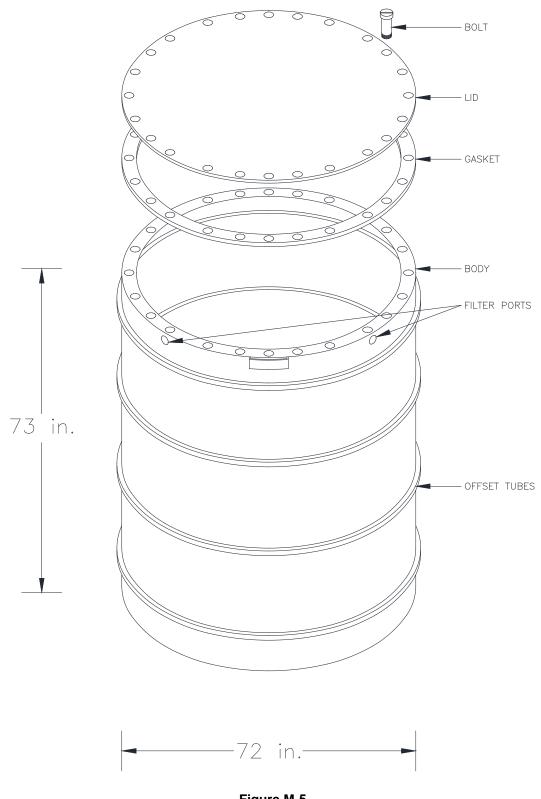


Figure M-5 Ten-Drum Overpack

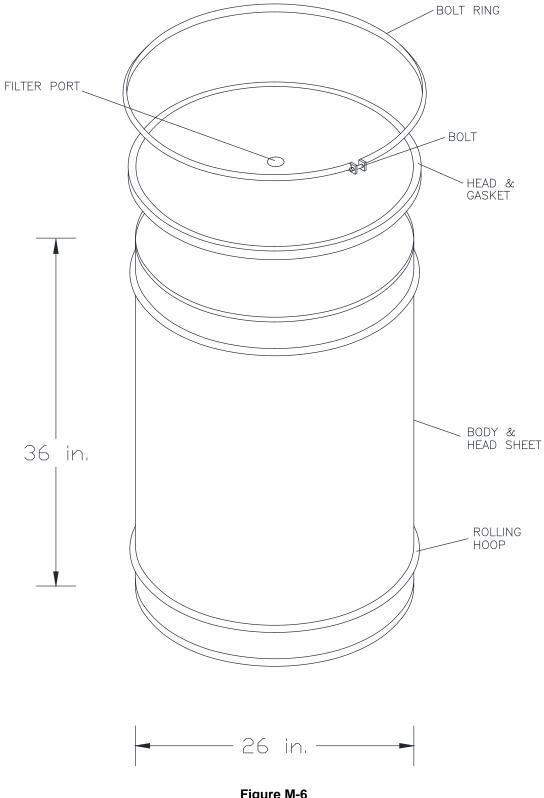


Figure M-6 85-Gallon Drum

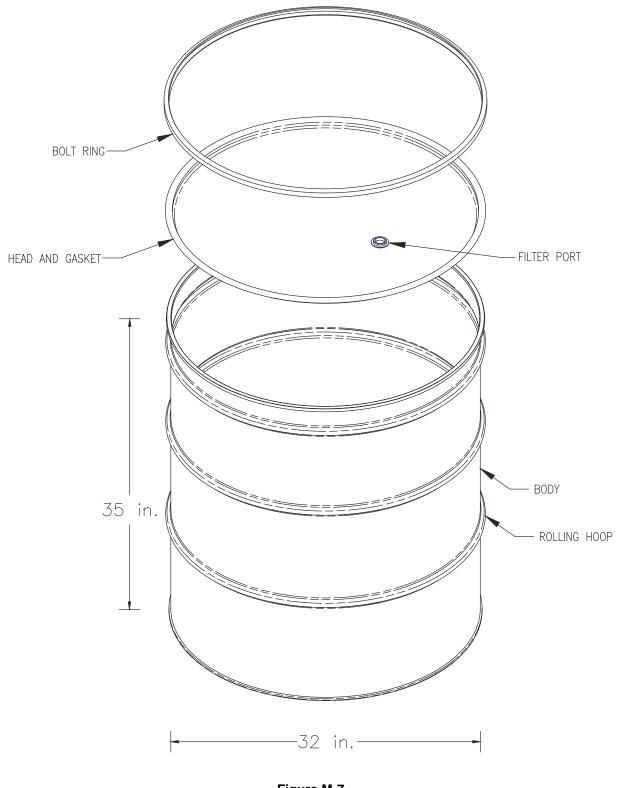


Figure M-7 100-Gallon Drum

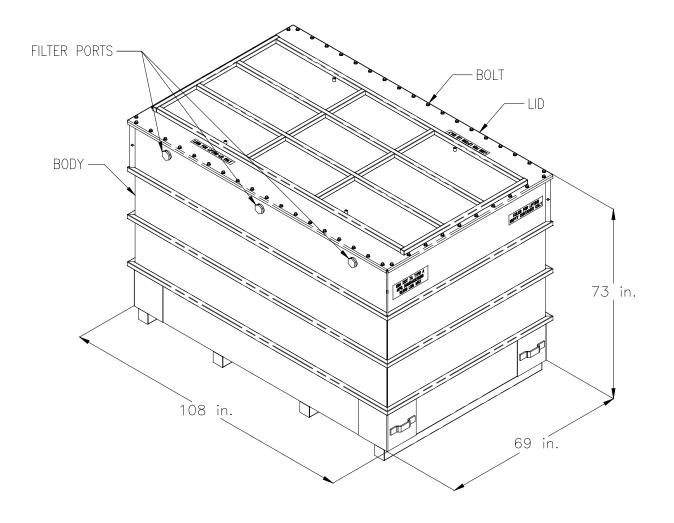


Figure M-8 Typical Standard Large Box 2

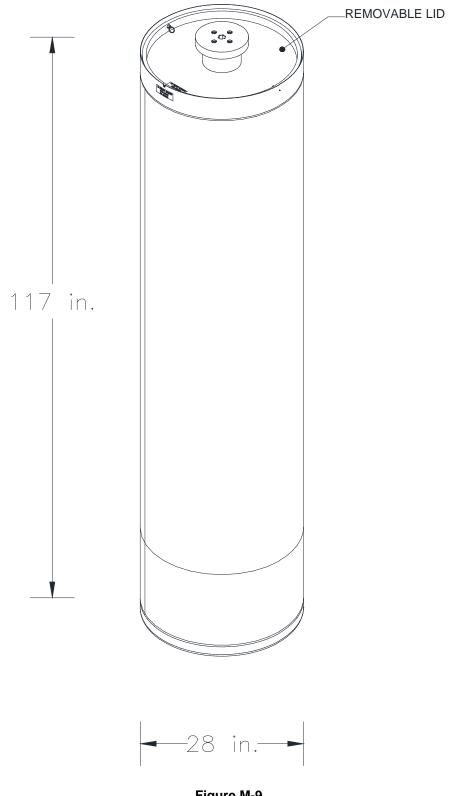


Figure M-9 Facility Canister Assembly

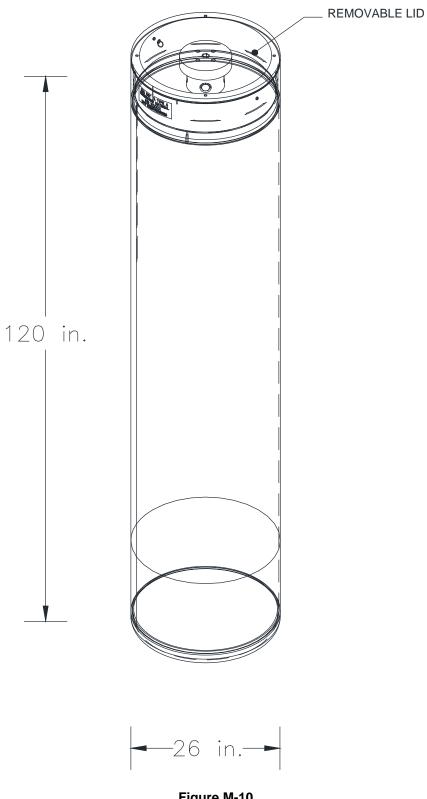


Figure M-10 RH-TRU 72-B Canister Assembly

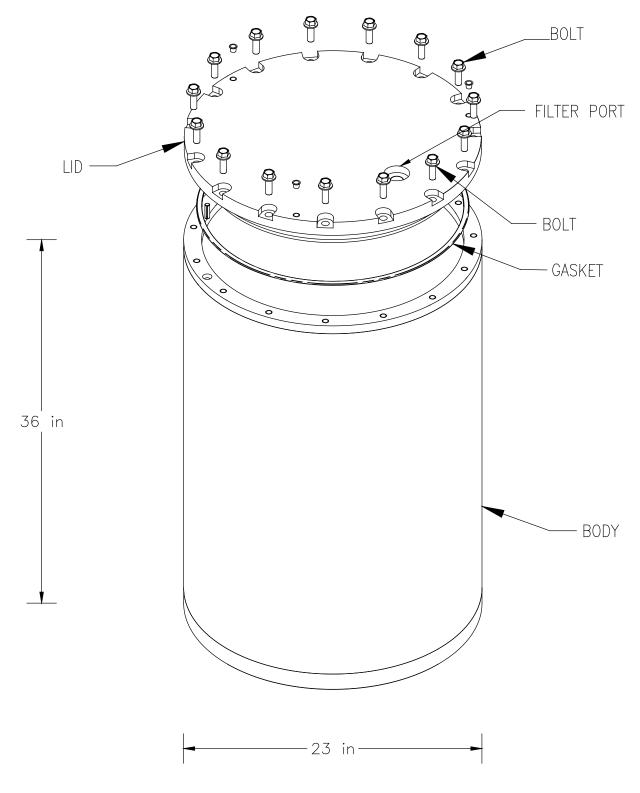


Figure M-11 Typical Shielded Container

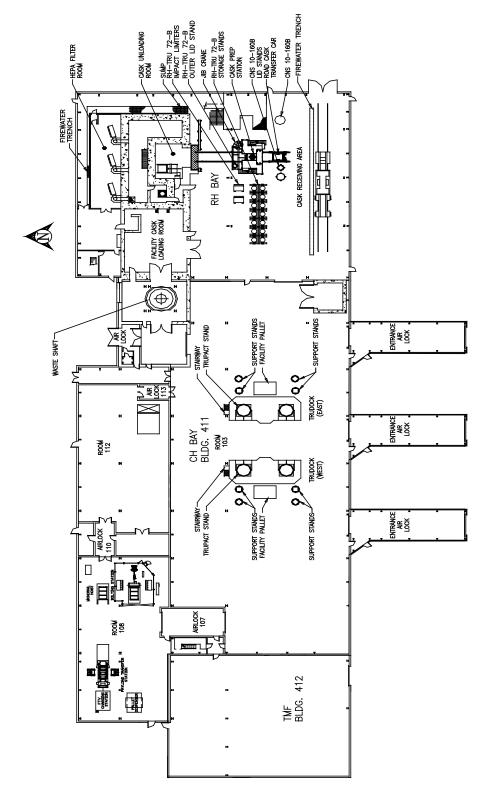
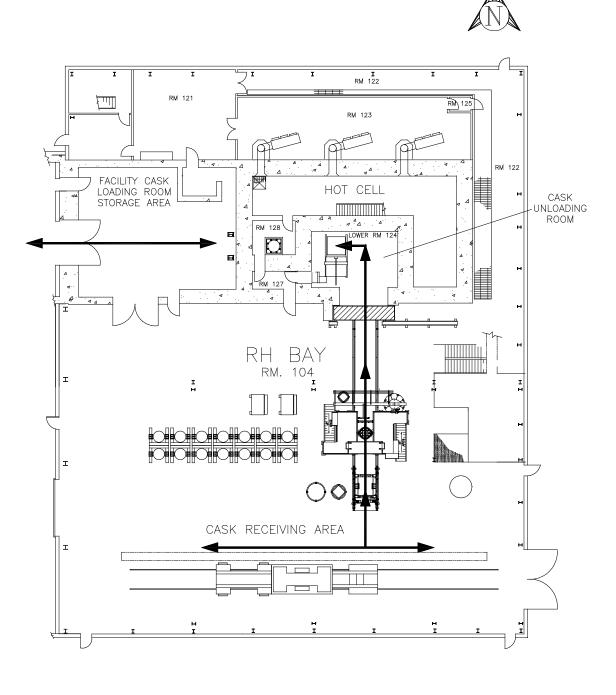


Figure M-12 Waste Handling Building Plan (Ground Floor)



RH BAY WASTE TRANSPORT ROUTES NOTE: RH BAY FLOOR, HOT CELL – LOWER FLOOR, AND CASK LOADING ROOM CONSIDERED 0 FOOT ELEVATION

Figure M-13 RH Bay Ground Floor and Waste Transport Routes

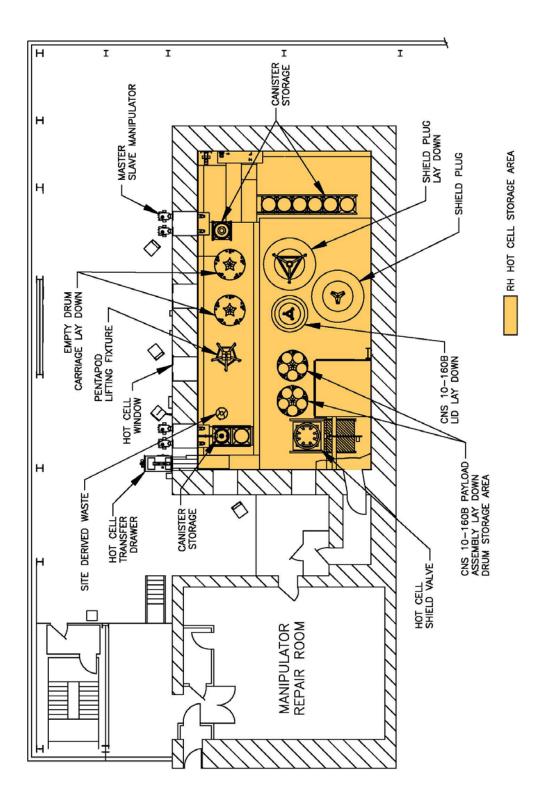


Figure M-14 RH Hot Cell Storage Area

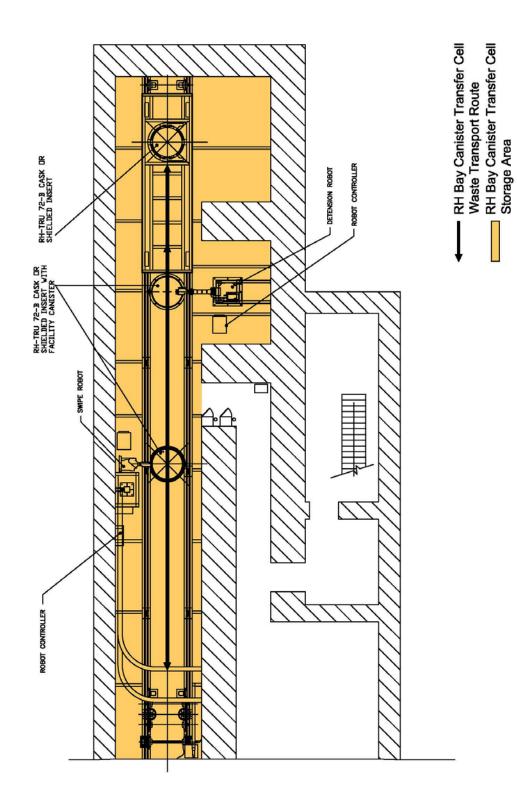


Figure M-15 RH Canister Transfer Cell Storage Area and Waste Transport Route

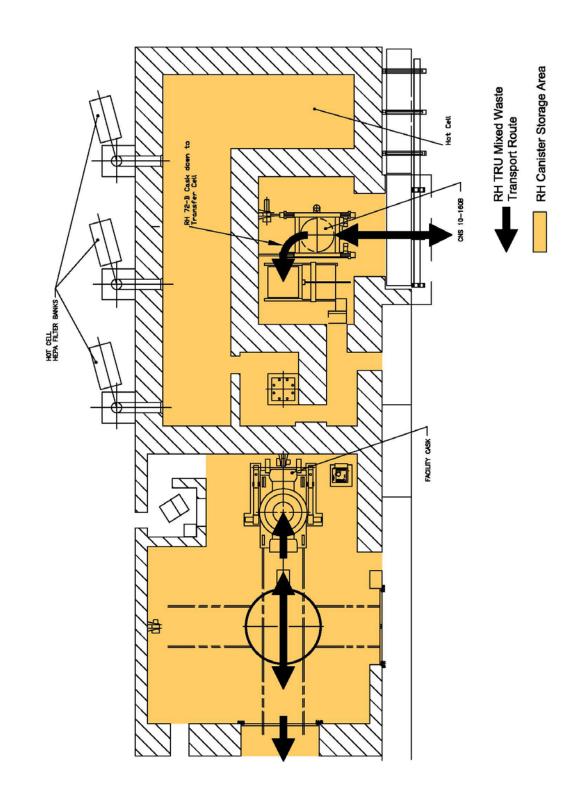


Figure M-16 RH Facility Cask Loading Room and Cask Unloading Storage Area and Waste Transport Route

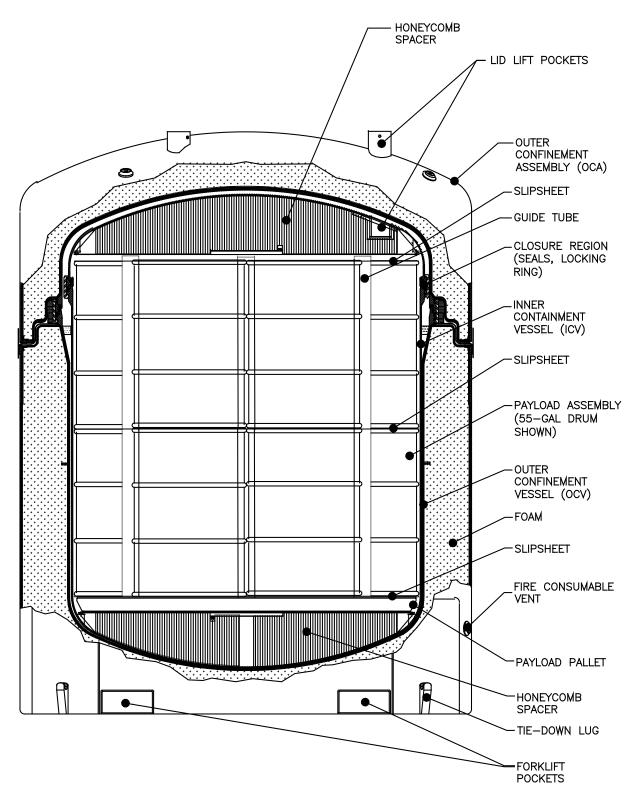


Figure M-17 TRUPACT-II Type B Shipping Container

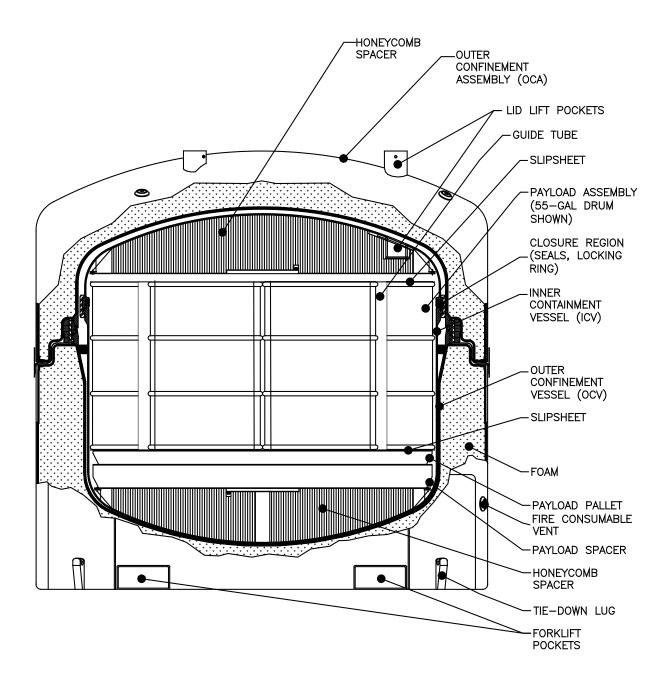


Figure M-18 Typical HalfPACT Type B Shipping Container

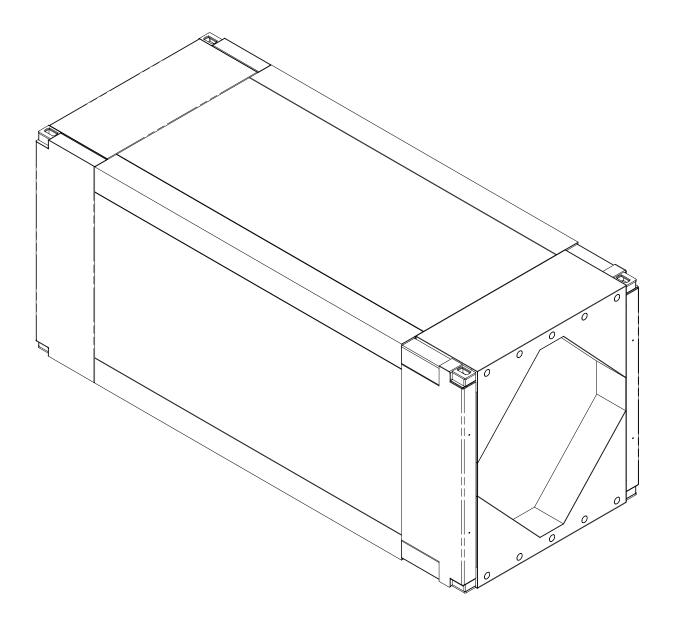


Figure M-19 Typical TRUPACT-III Type B Shipping Container

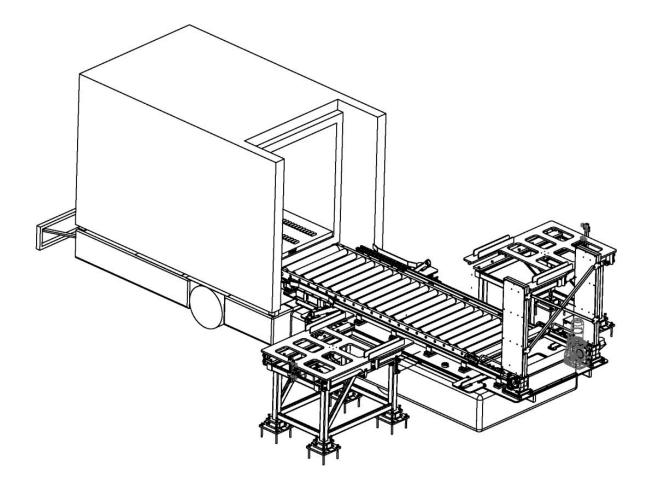


Figure M-20 Payload Transfer Station

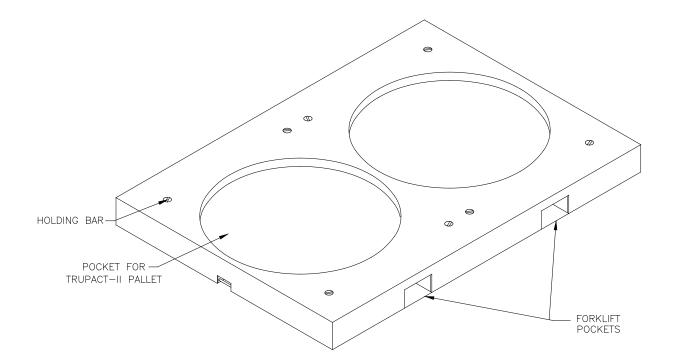


Figure M-21 Facility Pallet

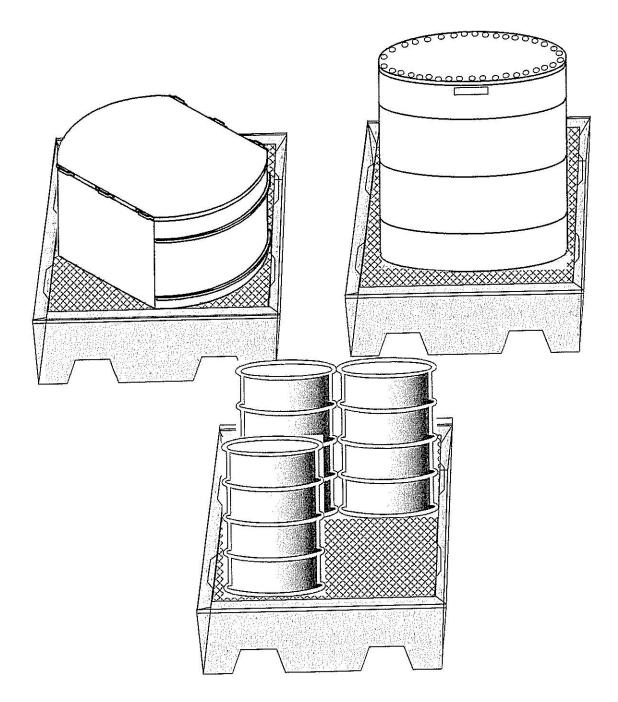


Figure M-22 Typical Containment Pallet

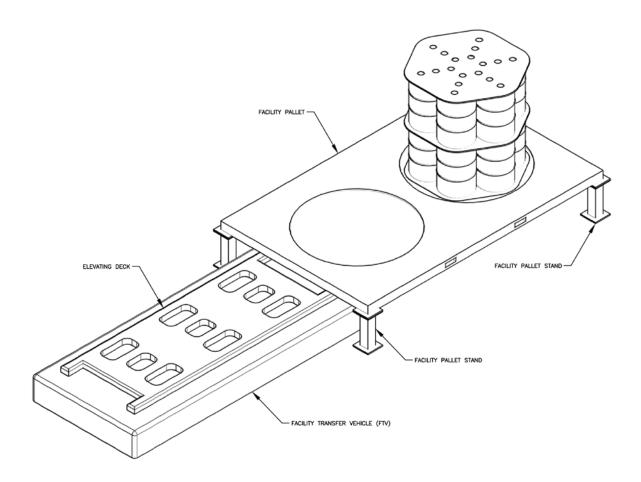


Figure M-23 Facility Transfer Vehicle, Facility Pallet, and Typical Pallet Stand

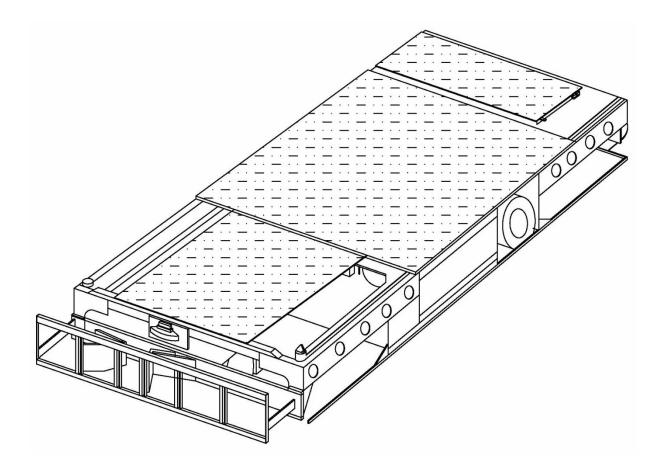


Figure M-24 Typical Yard Transfer Vehicle

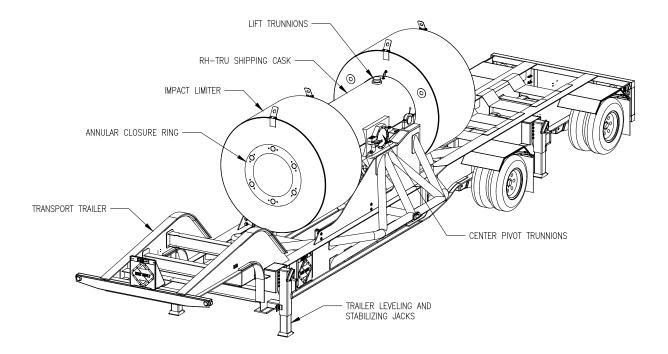


Figure M-25 RH TRU 72-B Shipping Cask on Trailer

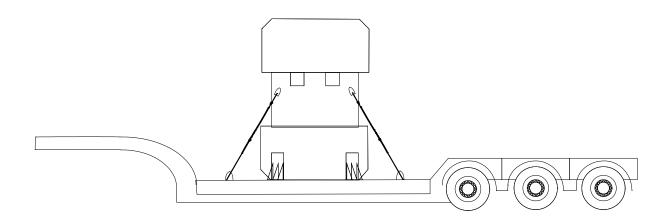


Figure M-26 CNS 10-160B Shipping Cask on Trailer

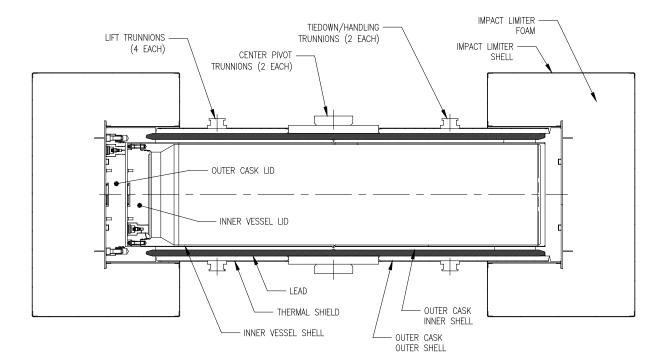


Figure M-27 RH-TRU 72-B Type B Shipping Cask

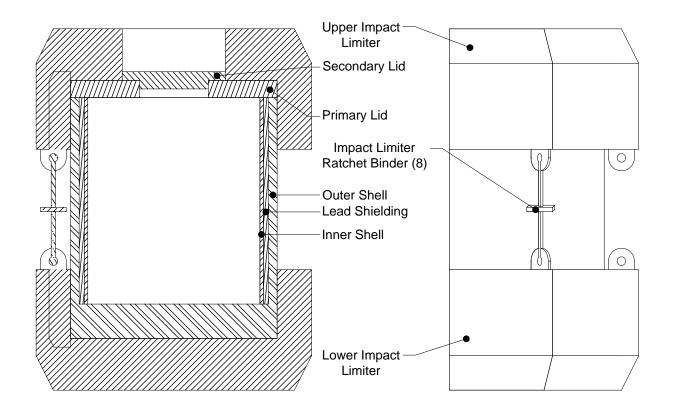


Figure M-28 CNS 10-160B Type B Shipping Cask

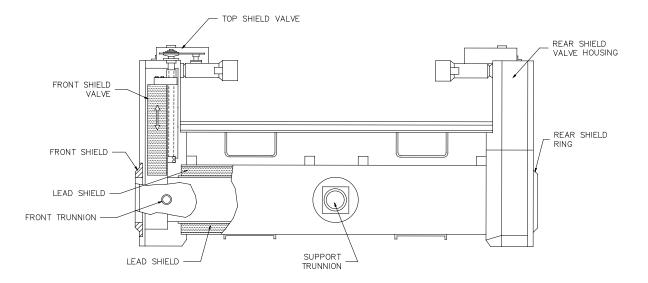


Figure M-29 RH Transuranic Waste Facility Cask and Light Weight Facility Cask

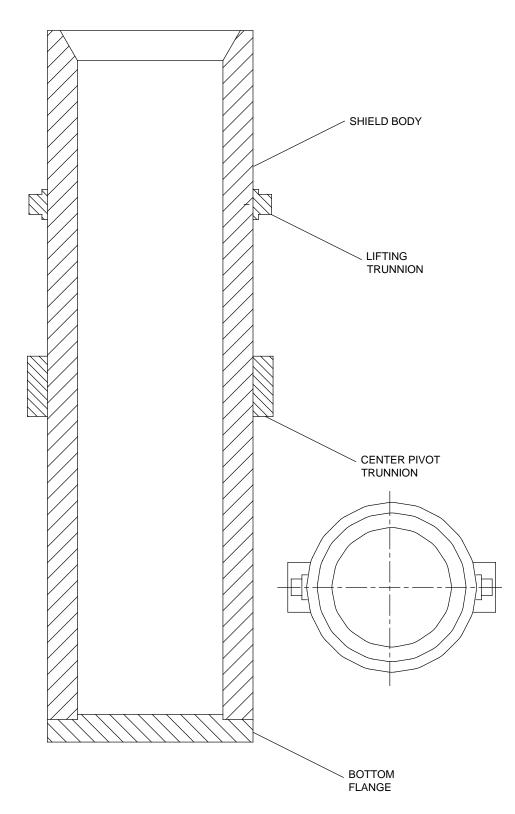


Figure M-30 RH Shielded Insert Assembly

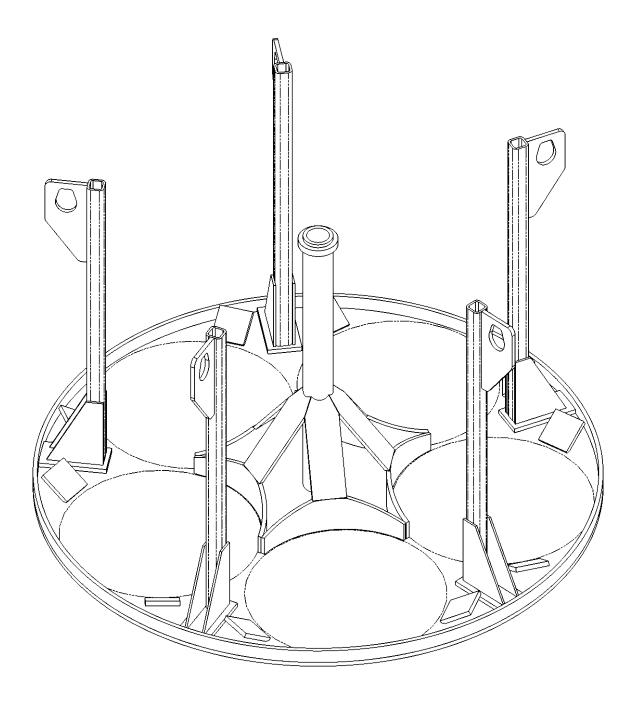


Figure M-31 CNS 10-160B Drum Carriage

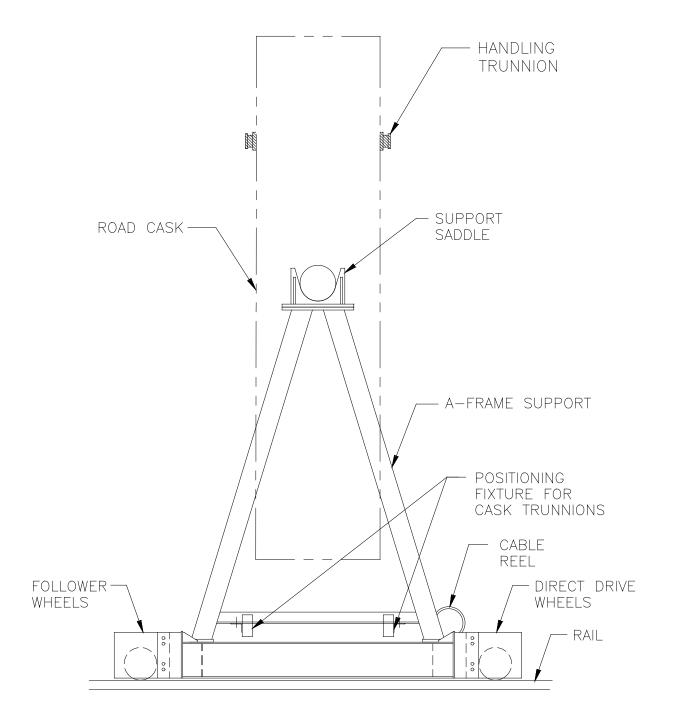


Figure M-32 RH-TRU 72-B Cask Transfer Car

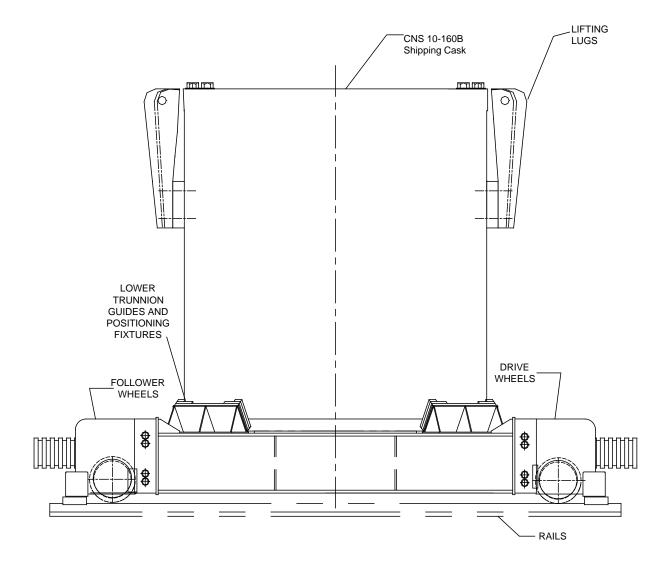


Figure M-33 CNS 10-160B Cask Transfer Car

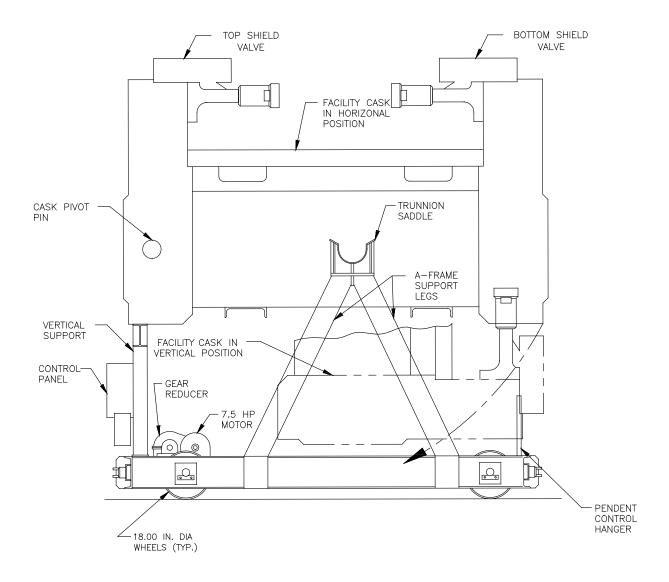


Figure M-34 RH Facility Cask Transfer Car (Side View)

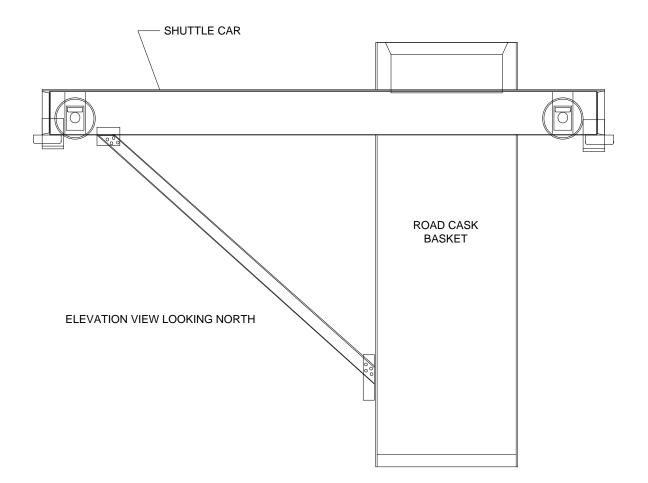
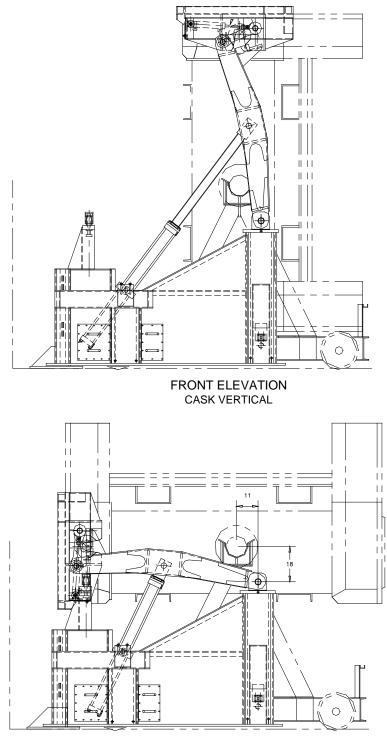


Figure M-35 Transfer Cell Shuttle Car



FRONT ELEVATION CASK HORIZONTAL

Figure M-36 Facility Cask Rotating Device

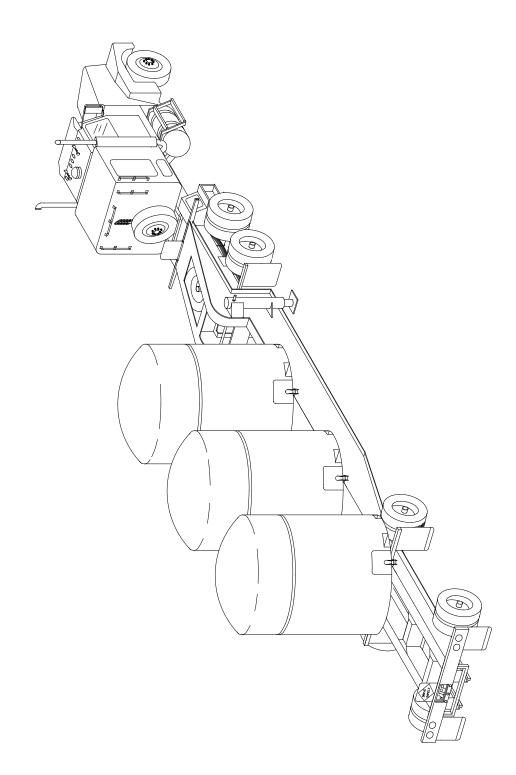


Figure M-37 TRUPACT-II Containers on Trailer

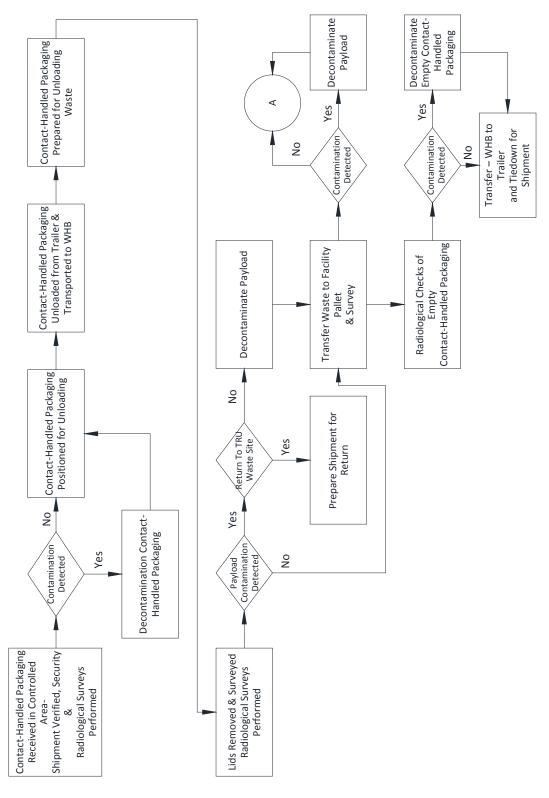


Figure M-38 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram

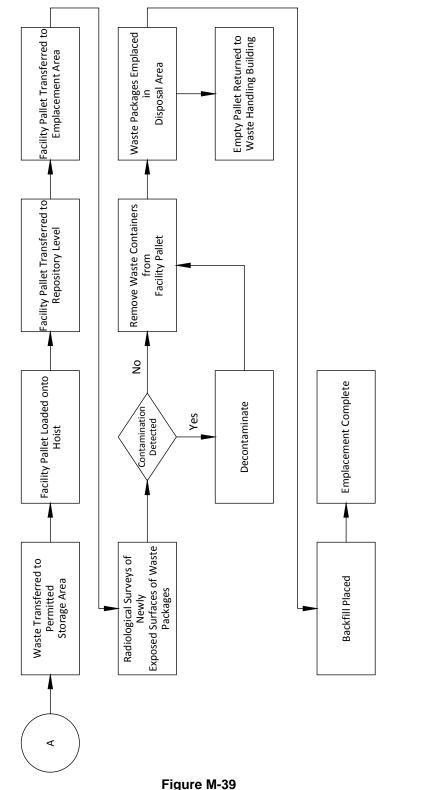


Figure M-39 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram (Continued)

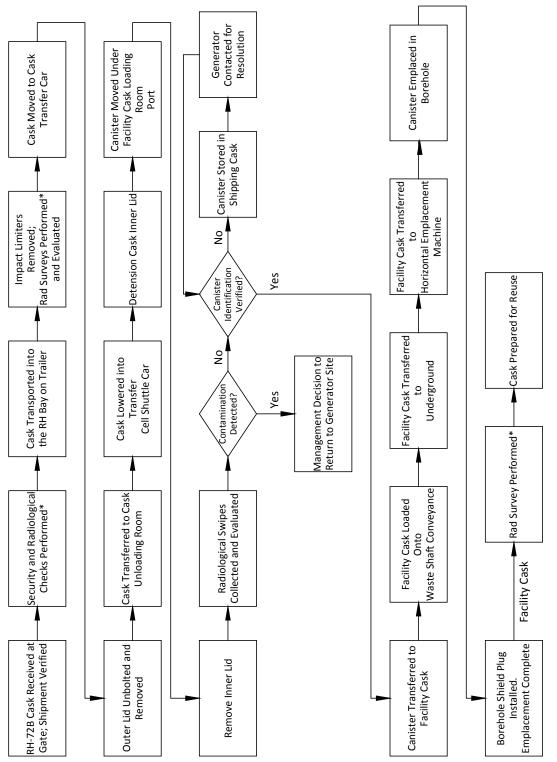


Figure M-40 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for RH-TRU 72-B Shipping Cask

*If radiological surveys or swipes reveal cask contamination, the cask will be decontaminated.

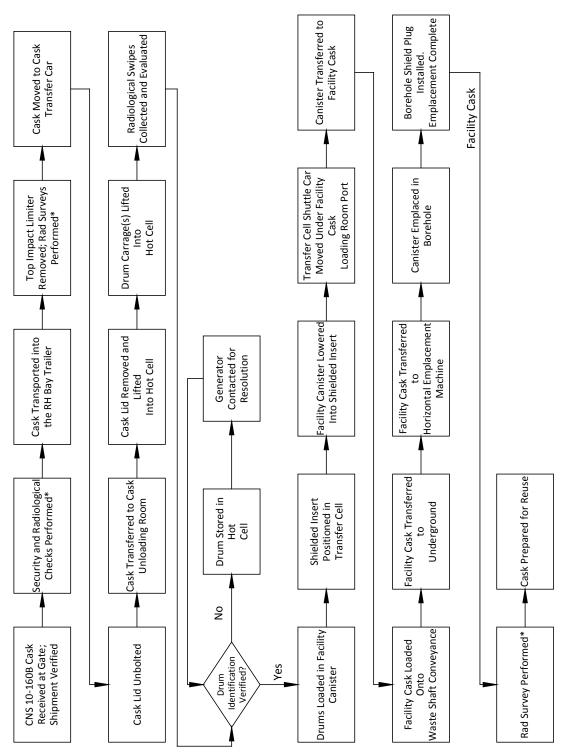


Figure M-41 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for CNS 10-160B Shipping Cask

*If radiological surveys or swipes reveal cask contamination, the cask will be decontaminated.

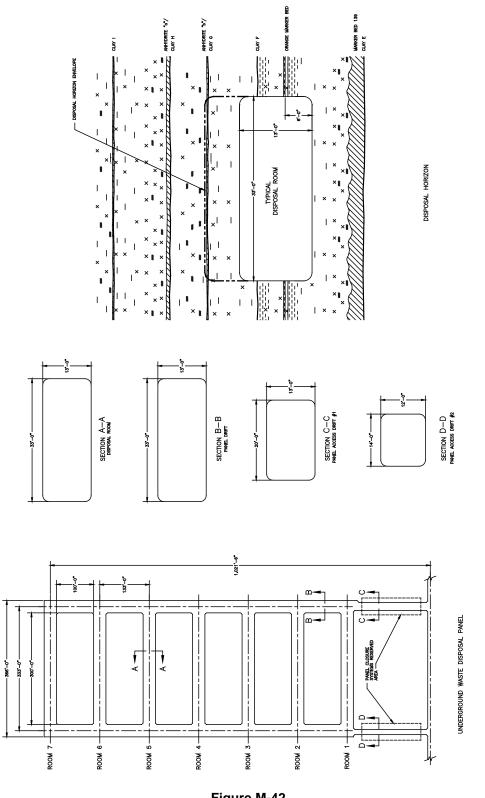


Figure M-42 Typical Disposal Panel

TYPICAL EXCAVATION SECTIONS

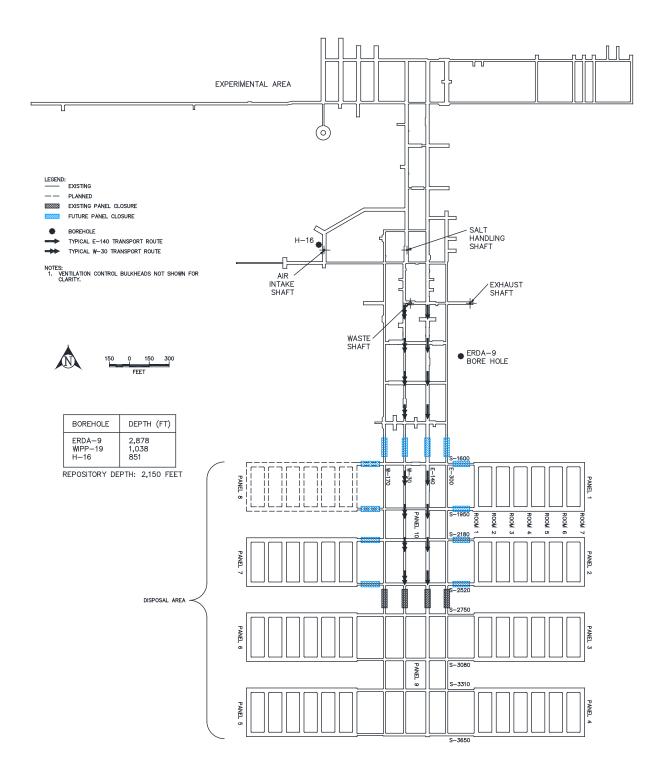


Figure M-43 Repository Horizon and Underground Waste Transport Routes

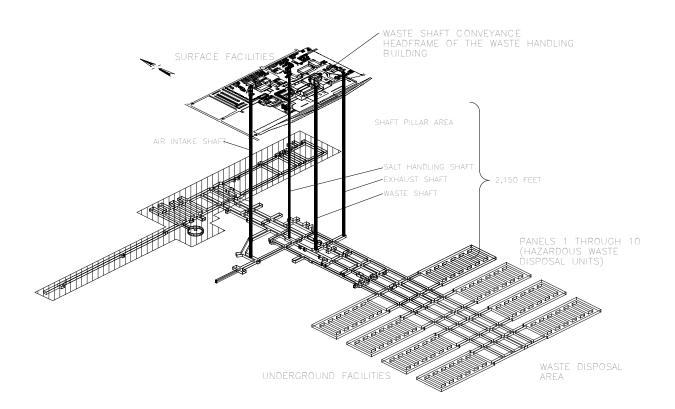
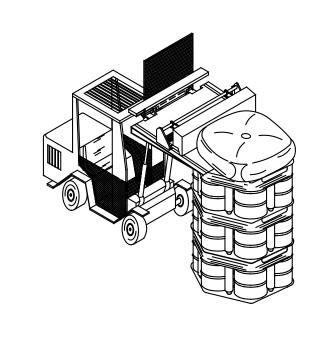


Figure M-44 Spatial View of the Miscellaneous Unit and Waste Handling Facility



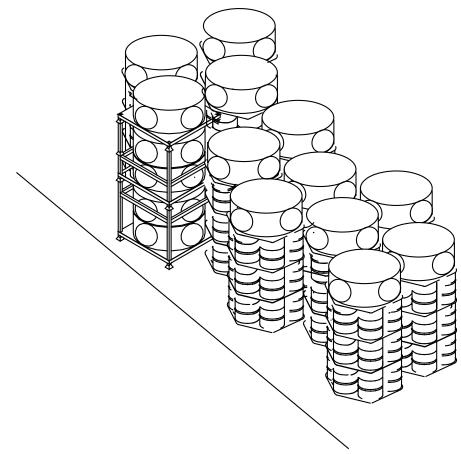


Figure M-45 Typical MgO Backfill Sacks Emplaced on Drum Stacks and Emplacement Configurations

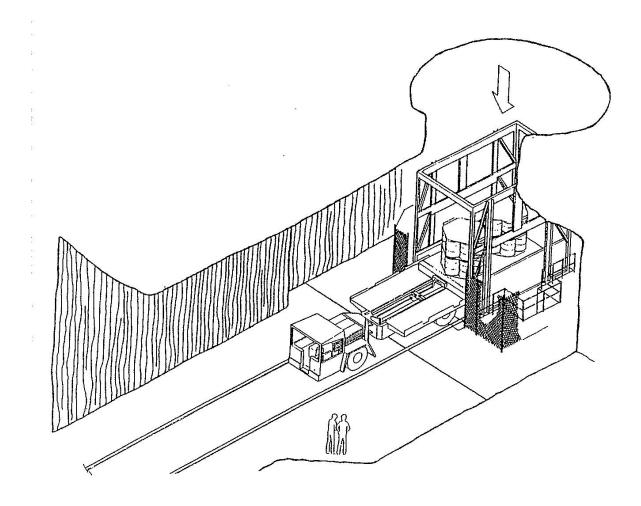


Figure M-46 Waste Transfer Cage to Transporter

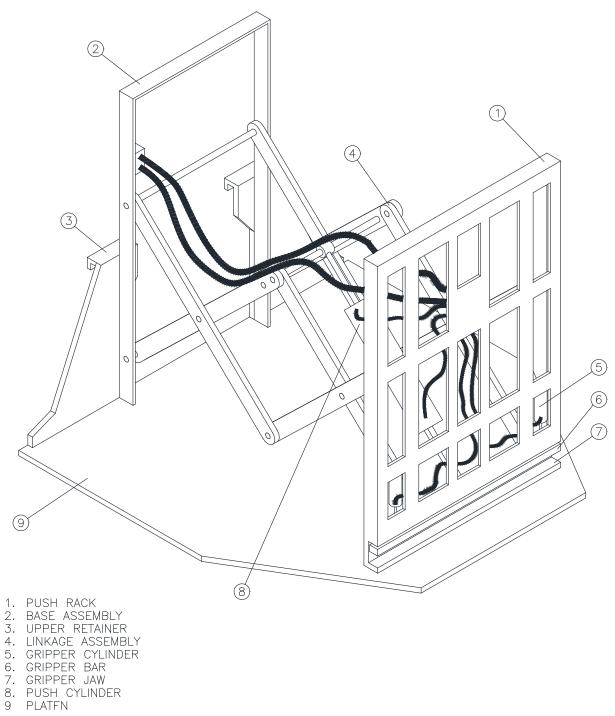


Figure M-47 Push-Pull Attachment to Forklift to Allow Handling of Waste Containers

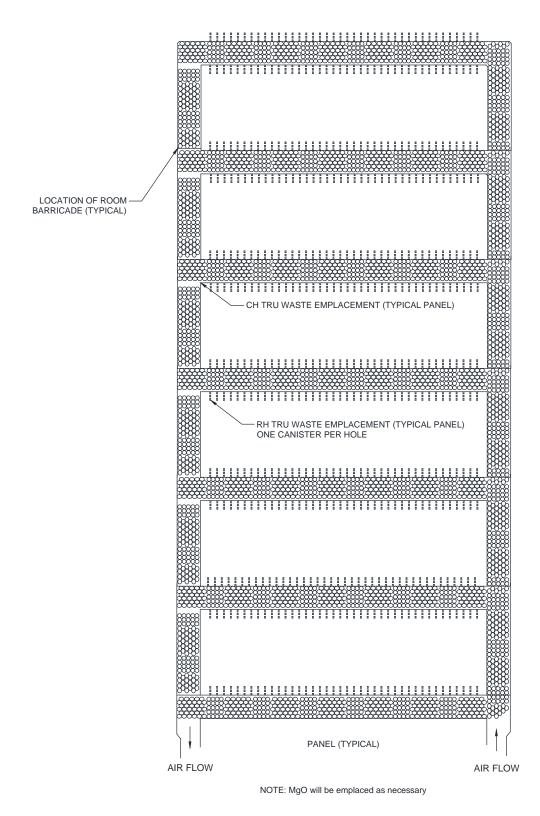


Figure M-48 Typical RH and CH TRU Mixed Waste Container Disposal Configuration

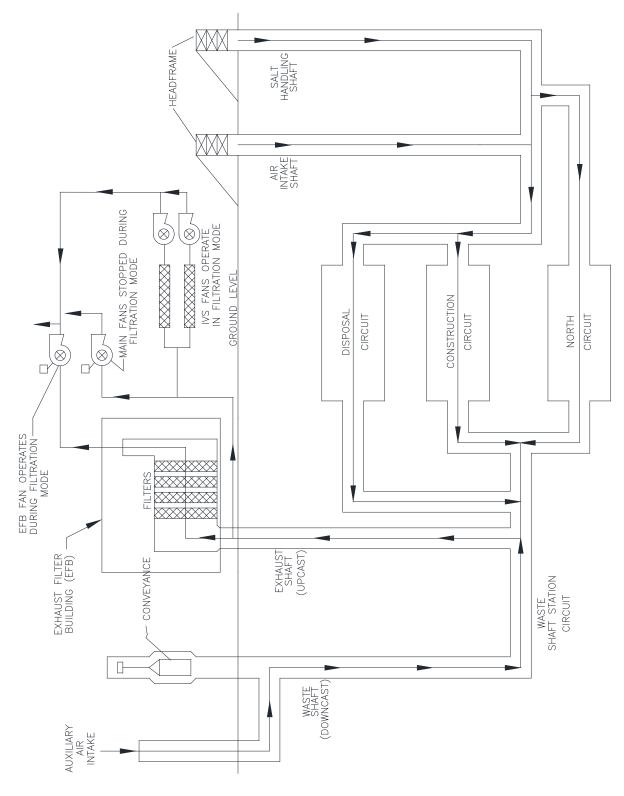


Figure M-49 Underground Ventilation System Airflow

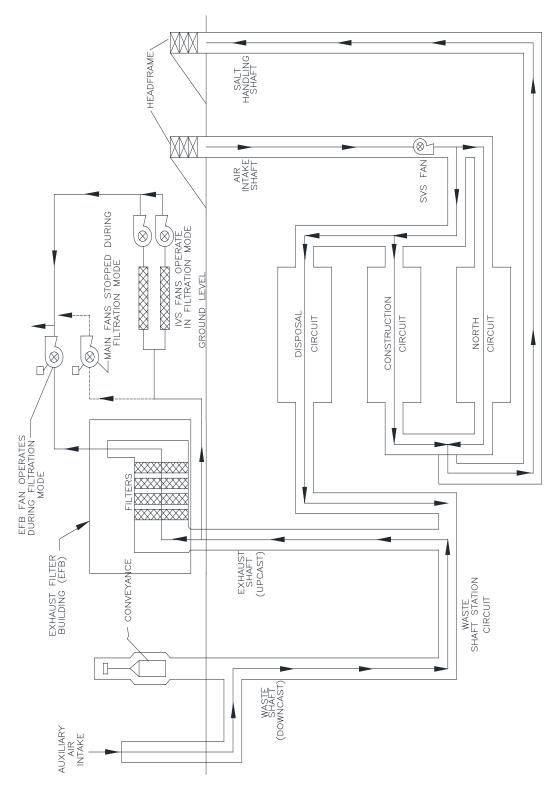


Figure M-50 Underground Ventilation System Airflow (with SVS)

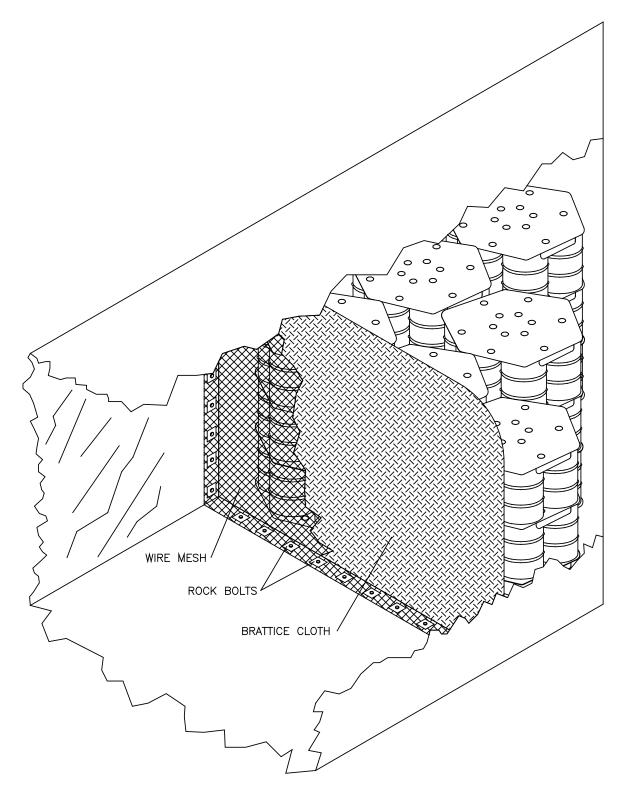


Figure M-51 Typical Room Barricade

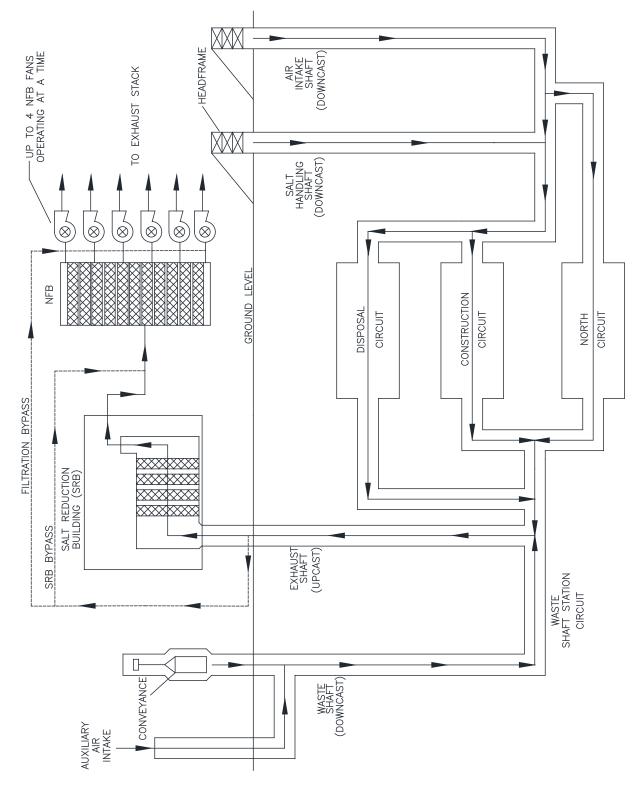


Figure M-52 Underground Ventilation System Airflow (with Building 416)

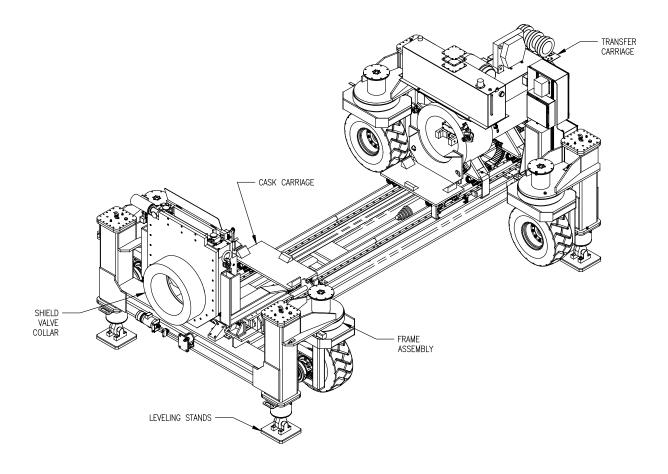


Figure M-53 Typical RH Emplacement Equipment

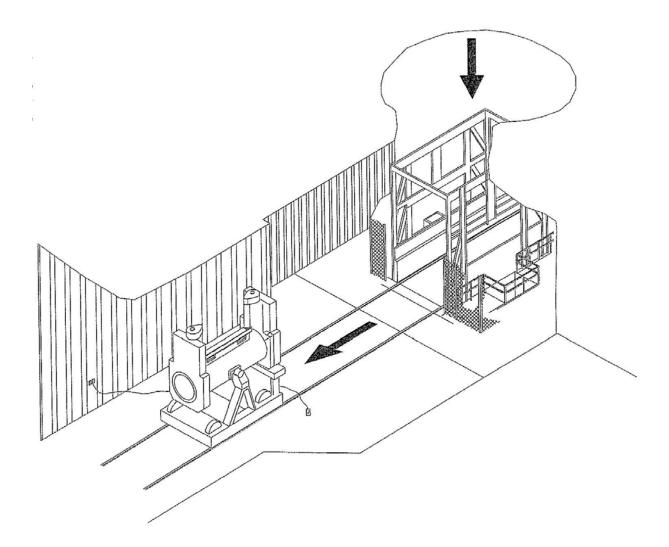


Figure M-54 RH TRU Waste Facility Cask Unloading from Waste Shaft Conveyance

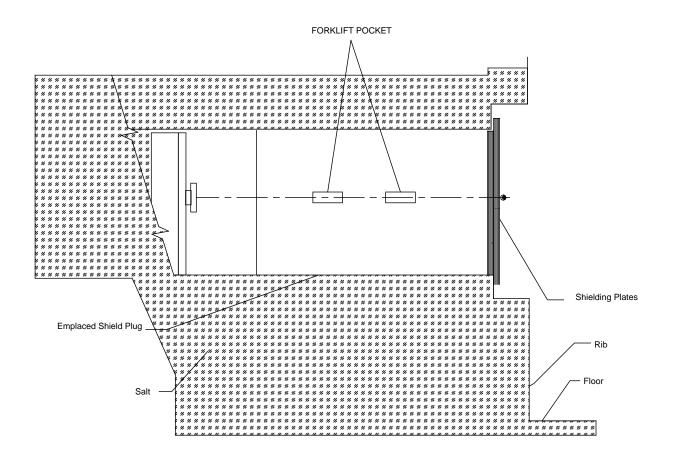


Figure M-55 Section of Borehole Showing the RH Shield Plug and Supplemental Shielding Plate(s)

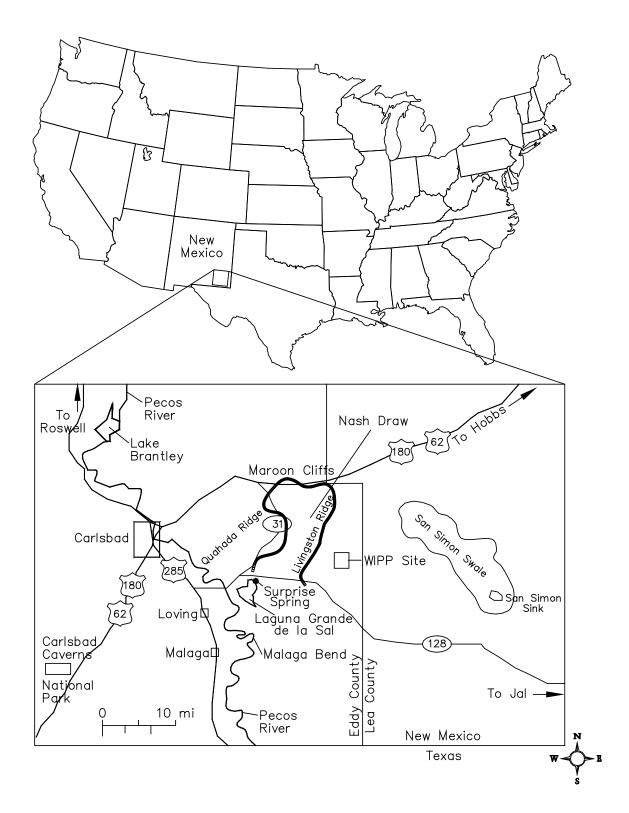
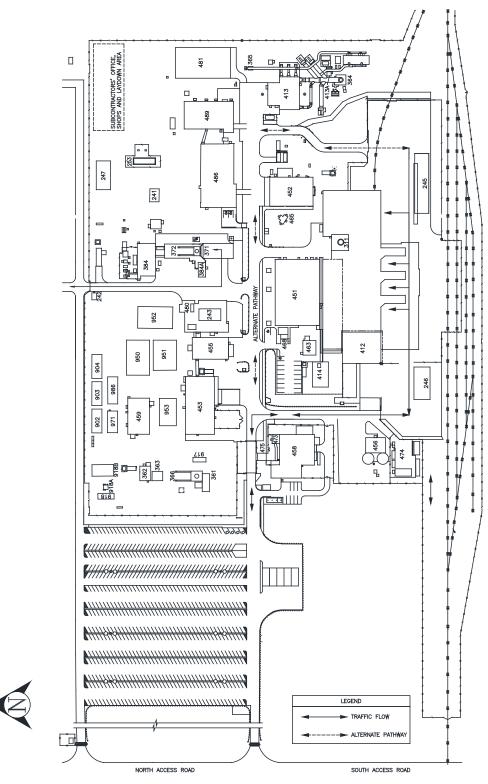
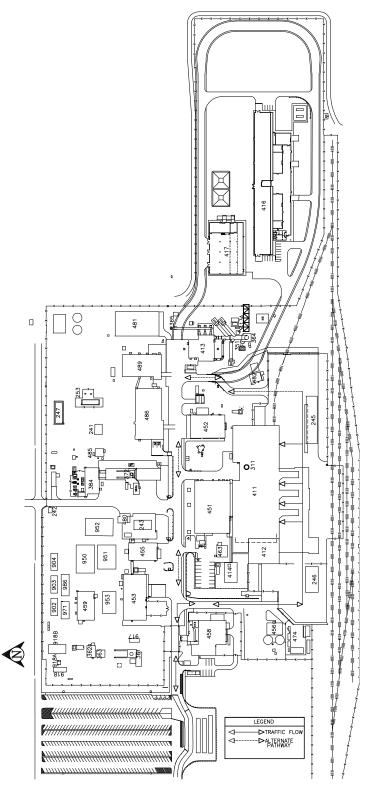


Figure M-56 General Location of the WIPP Facility



(see Figure D-1 for legend of the surface buildings)

Figure M-57 WIPP Traffic Flow Diagram



(see Figure D-1-NFB for legend of the surface buildings)

Figure M-58 WIPP Traffic Flow Diagram with Building 416

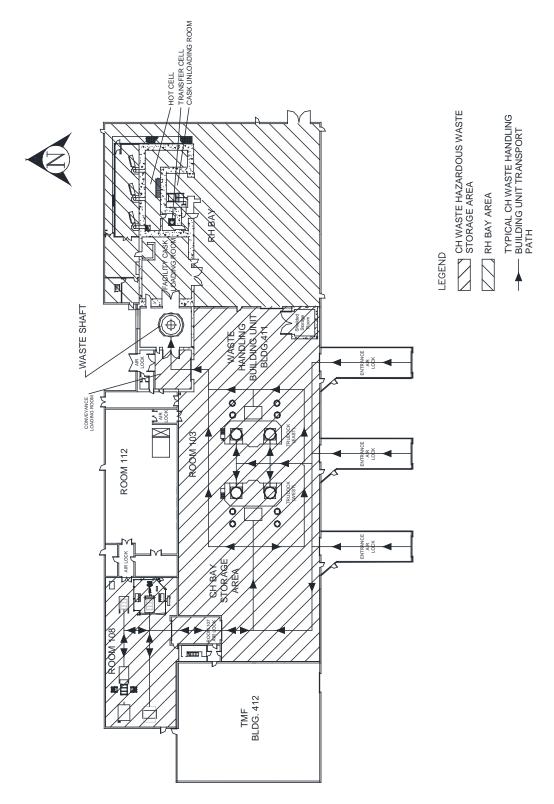


Figure M-59 Typical CH Mixed Waste Transport Routes in Waste Handling Building - Container Storage Unit

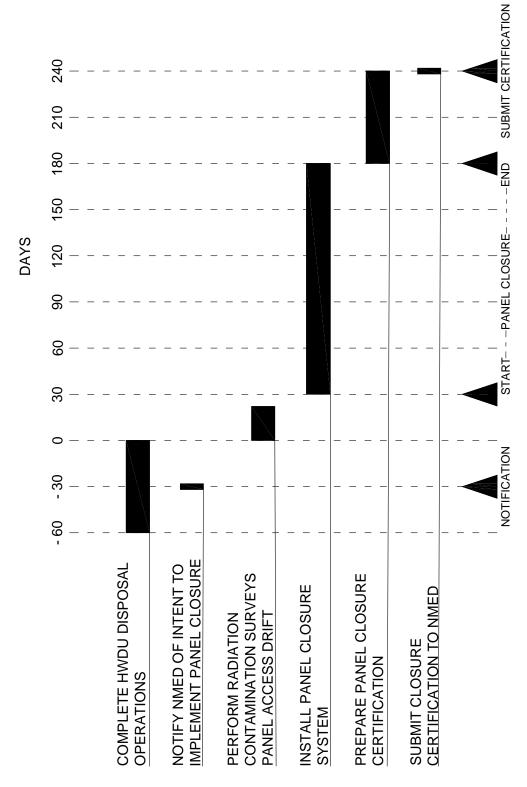


Figure M-60 WIPP Panel Closure Schedule

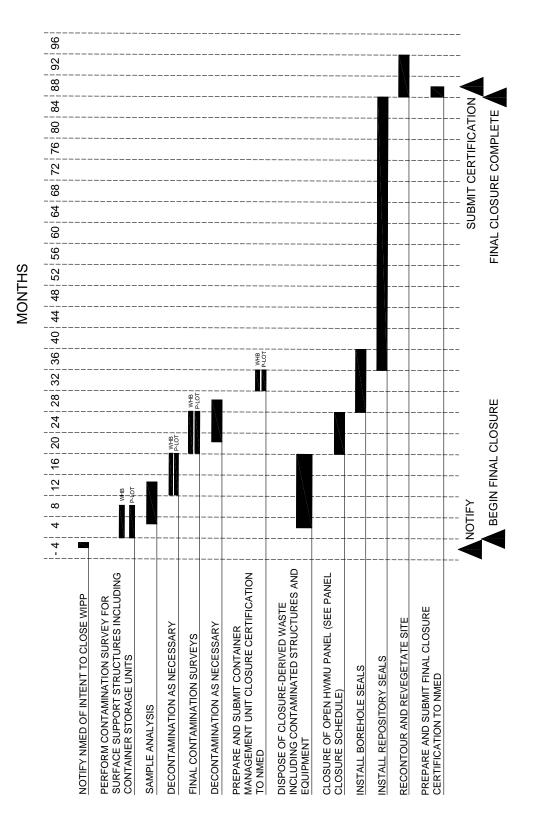
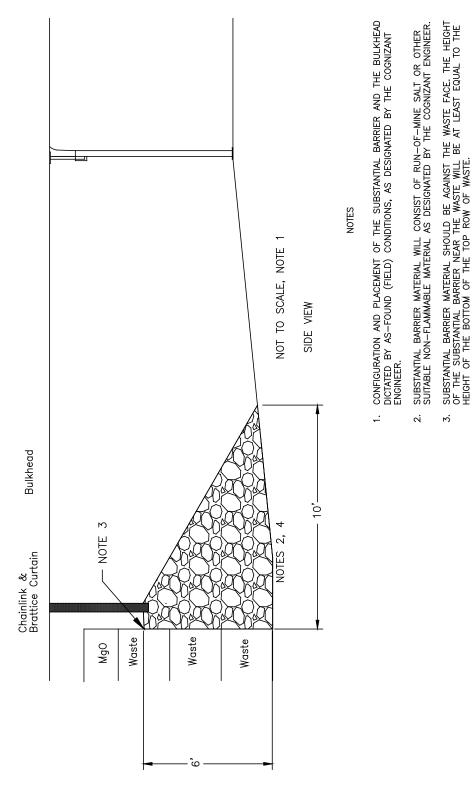


Figure M-61 WIPP Facility Final Closure 84-Month Schedule



 DIMENSIONS INDICATED ARE MINIMUMS. THE HEIGHT OF THE SUBSTANTIAL BARRIER IS MEASURED AT THE WASTE FACE. THE LENGTH OF THE SUBSTANTIAL BARRIER IS MEASURED FROM THE BOTTOM OF THE WASTE FACE TO THE TOE OF THE SUBSTANTIAL BARRIER MATERIAL.

200318

Figure M-62 Typical Substantial Barrier and Bulkhead

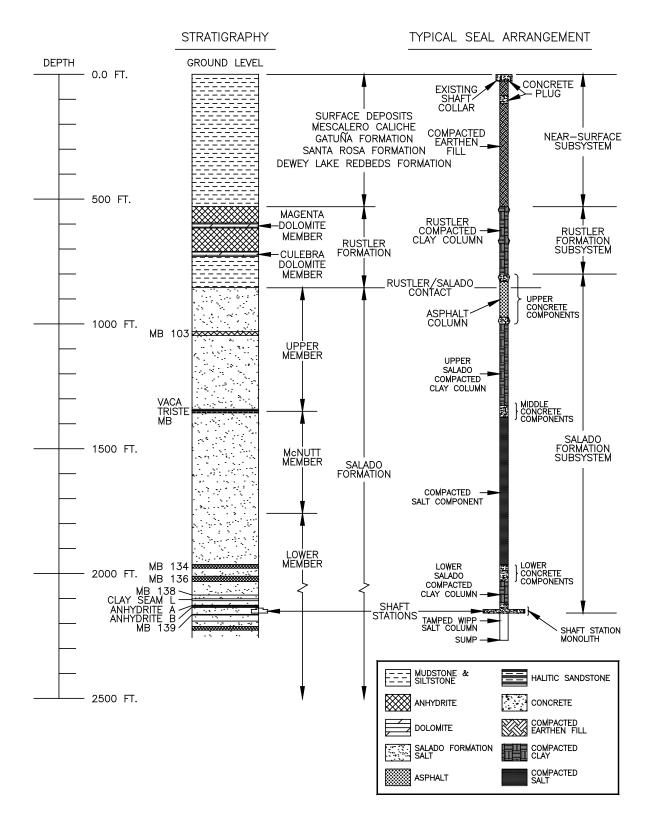


Figure M-63 Typical Shaft Sealing System

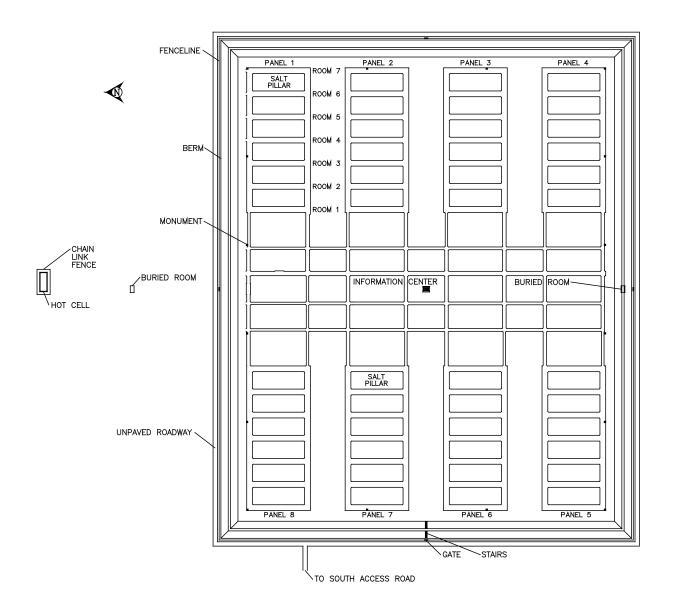


Figure M-64 Perimeter Fenceline and Roadway

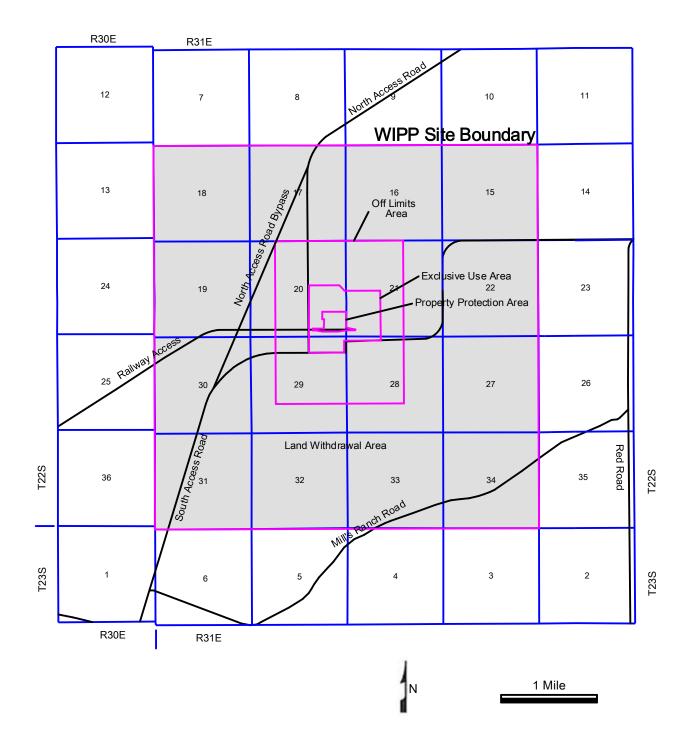


Figure M-65 WIPP Facility Boundaries Showing 16-square-Mile Land Withdrawal Boundary

SYSTEM	SERIES	GROUP	FORMATION	MEMBER	
RECENT	RECENT		SURFICIAL DEPOSITS		
			MESCALERO CALICHE		
QUATERNARY	PLEISTOCENE		GATUÑA		
TERTIARY	MID-PLIOCENE		OGALLALA		
TRIASSIC		DOCKUM	SANTA ROSA		
			DEWEY LAKE REDBEDS		
			RUSTLER	FORTY-NINER	
				MAGENTA DOLOMITE	
				TAMARISK	
				CULEBRA DOLOMITE	
	z			LOS MEDAÑOS	
	OCHOAN			UPPER	
				SALADO	MCNUTT POTASH
				LOWER	
PERMIAN			CASTILE		
	GUADALUPIAN	ITAIN	BELL CANYON		
		GUADALUPIA	DELEWARE MOUNTAIN	CHERRY CANYON	
		DEI	BRUSHY CANYON		

Figure M-66 Site Geologic Column

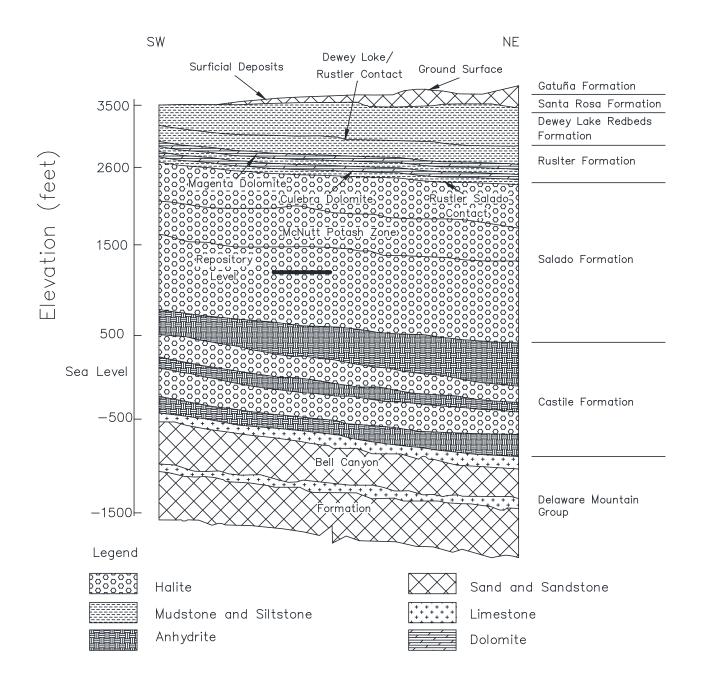
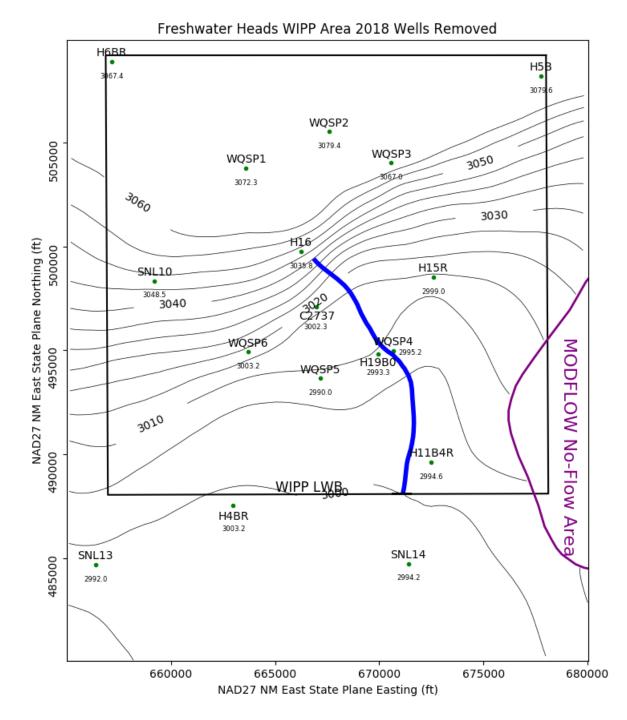


Figure M-67 Generalized Stratigraphic Cross Section above the Bell Canyon Formation at the WIPP Site



Model generated September 2019 utilizing May 2018 freshwater head contours with observed heads (ft) listed at each well. Contours are at 5 ft intervals with the blue line particle track from the waste handling shaft to the WIPP Land Withdrawal Boundary. The purple line is a constant head boundary representing the Rustler halite margin.

Figure M-68 Culebra Freshwater-Head Potentiometric Surface

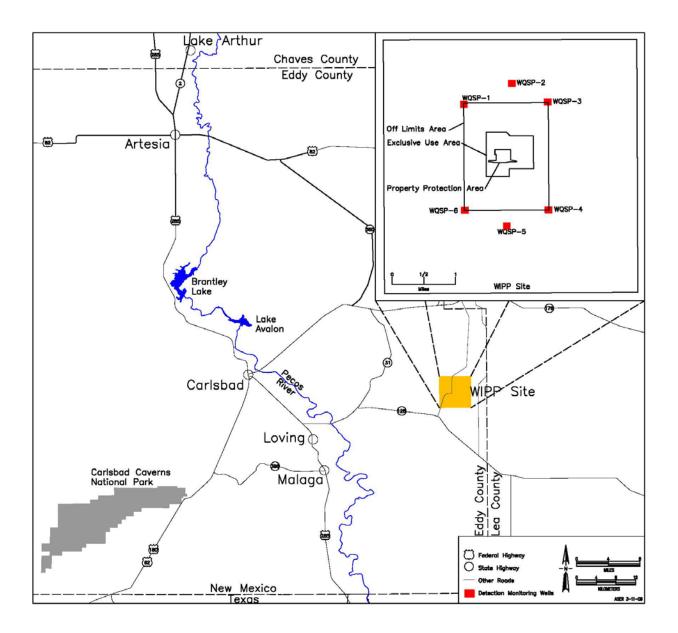
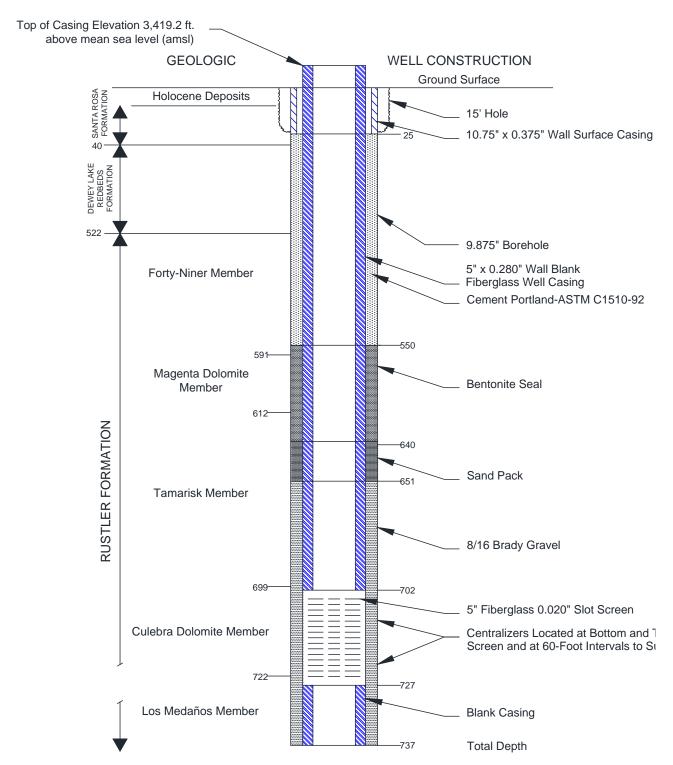
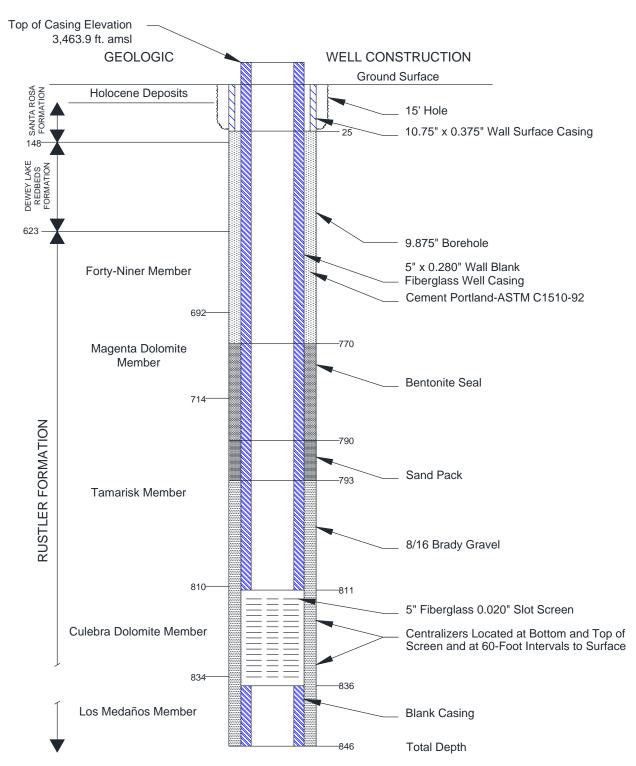


Figure M-69 Detection Monitoring Well Locations



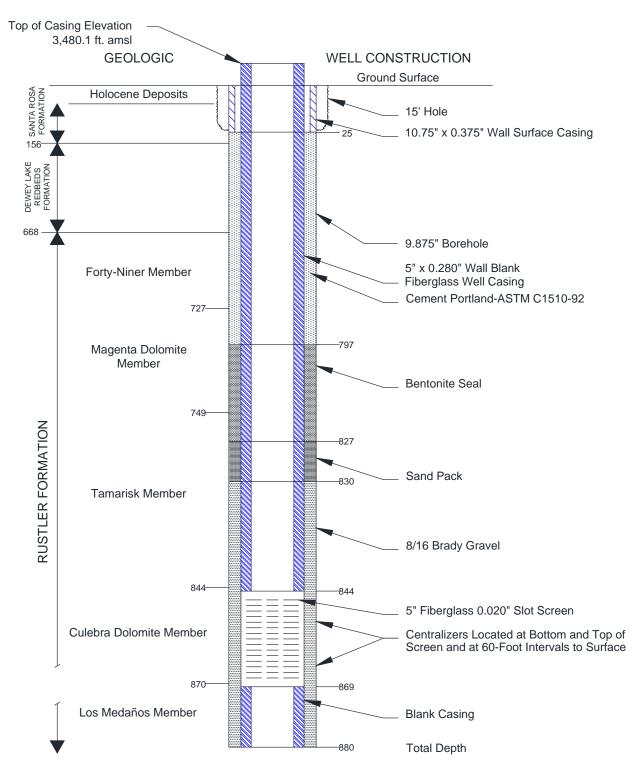
Note: Depths in feet below ground surface (bgs) approximate.

Figure M-70 As-Built Configuration of Well WQSP-1



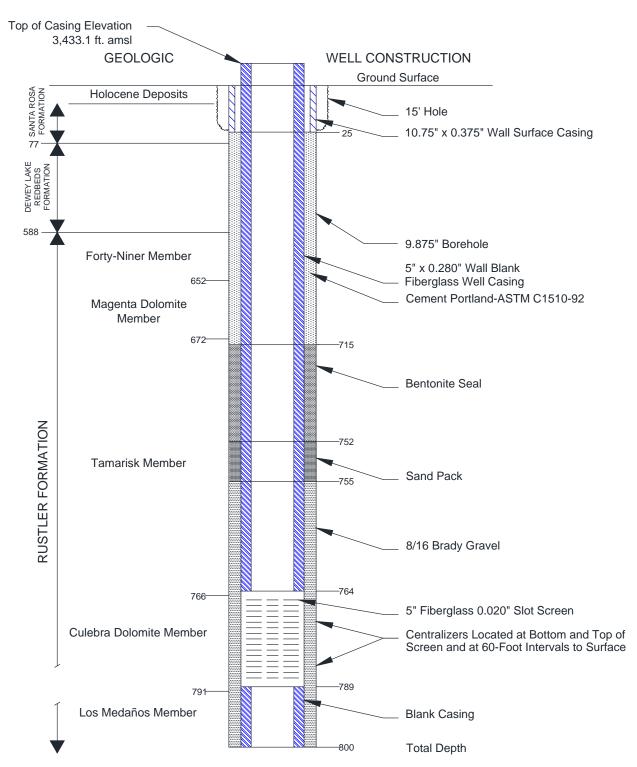
Note: Depths in feet bgs approximate.

Figure M-71 As-Built Configuration of Well WQSP-2



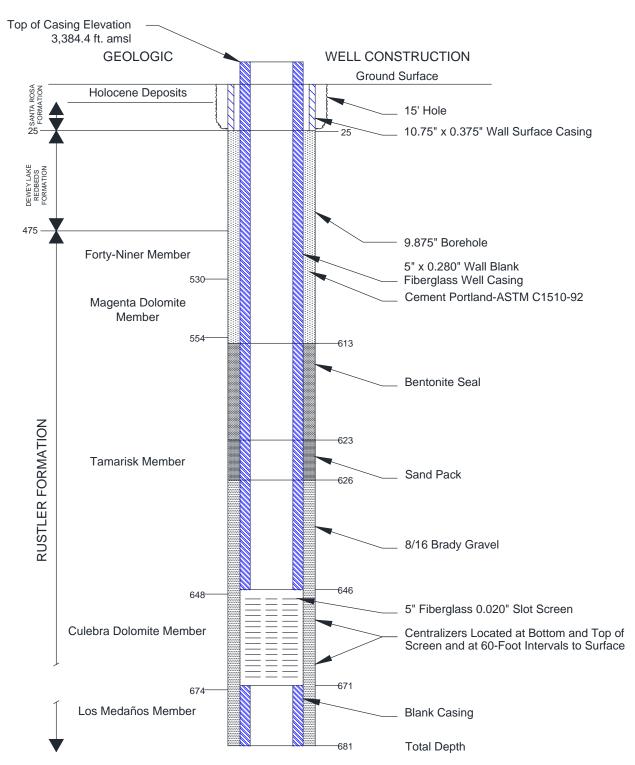
Note: Depths in feet bgs approximate.

Figure M-72 As-Built Configuration of Well WQSP-3



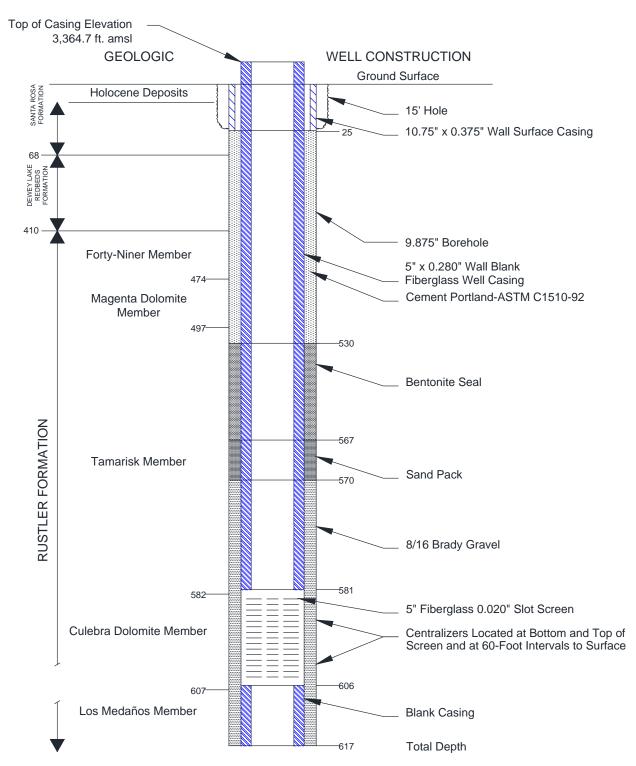
Note: Depths in feet bgs approximate.

Figure M-73 As-Built Configuration of Well WQSP-4



Note: Depths in feet bgs approximate.

Figure M-74 As-Built Configuration of Well WQSP-5



Note: Depths in feet bgs approximate.

Figure M-75 As-Built Configuration of Well WQSP-6

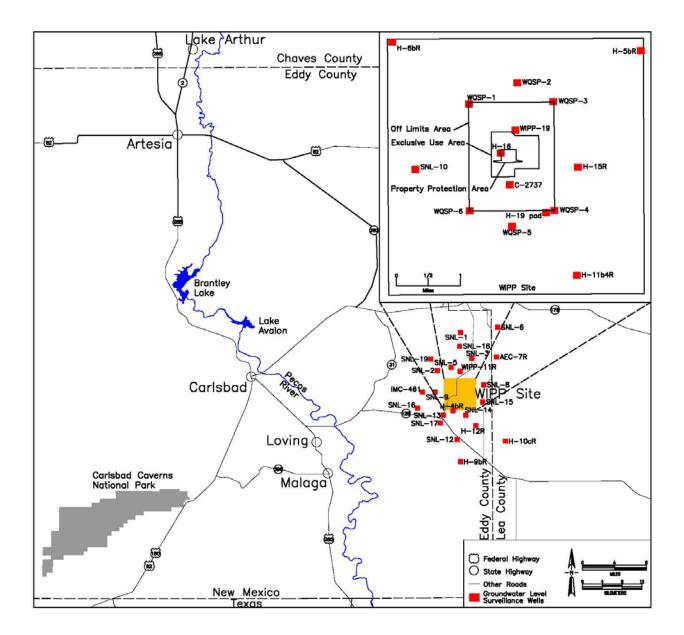
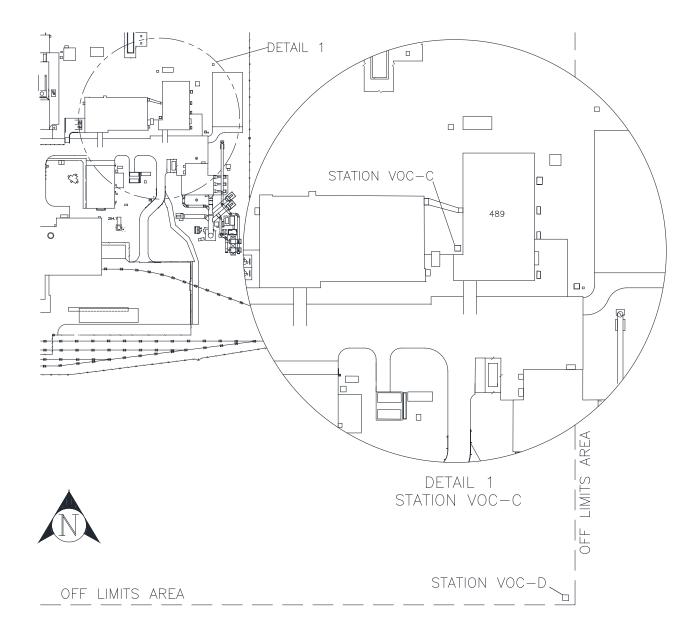


Figure M-76 Groundwater Level Surveillance Wells (inset represents the Groundwater Level Surveillance Wells within the WIPP Land Withdrawal Area)



(see Figure D-1 and Figure D-1a for a detailed map and legend of the surface buildings)

Figure M-77 Repository VOC Monitoring Locations

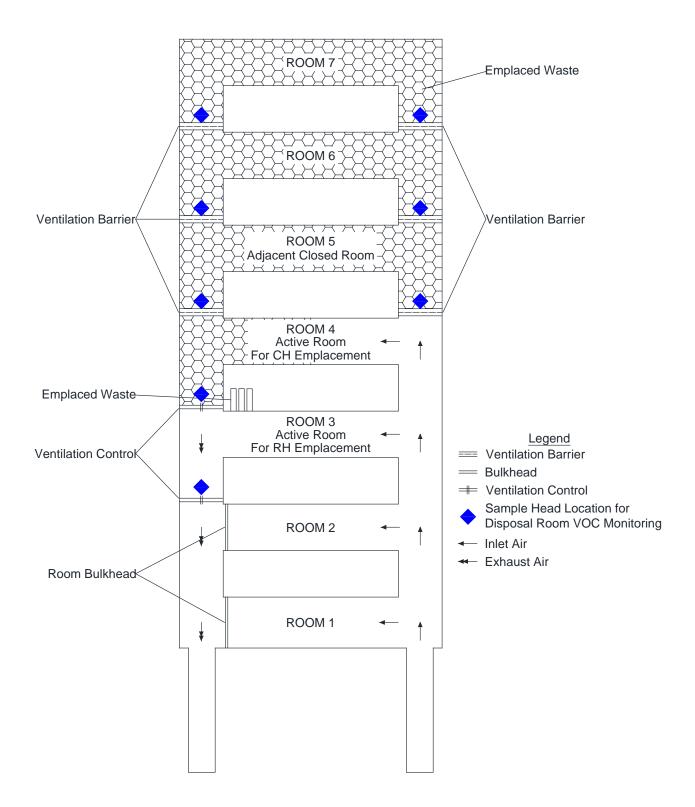
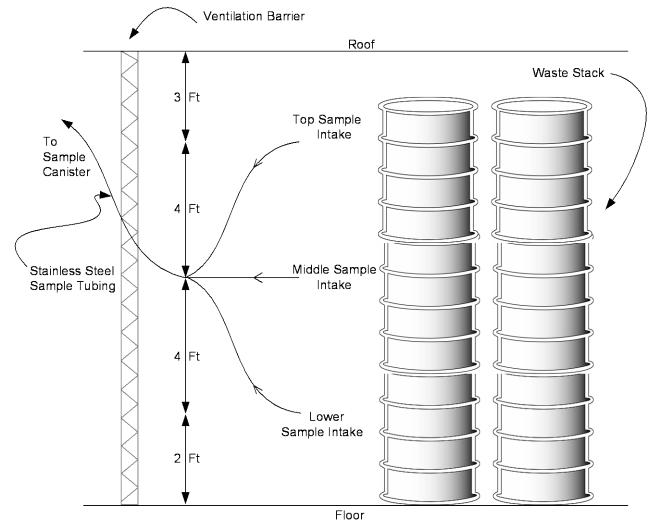


Figure M-78 Typical Disposal Room VOC Monitoring Locations



(not to scale, all measurements approximate)

Figure M-79 Disposal Room Sample Head Arrangement

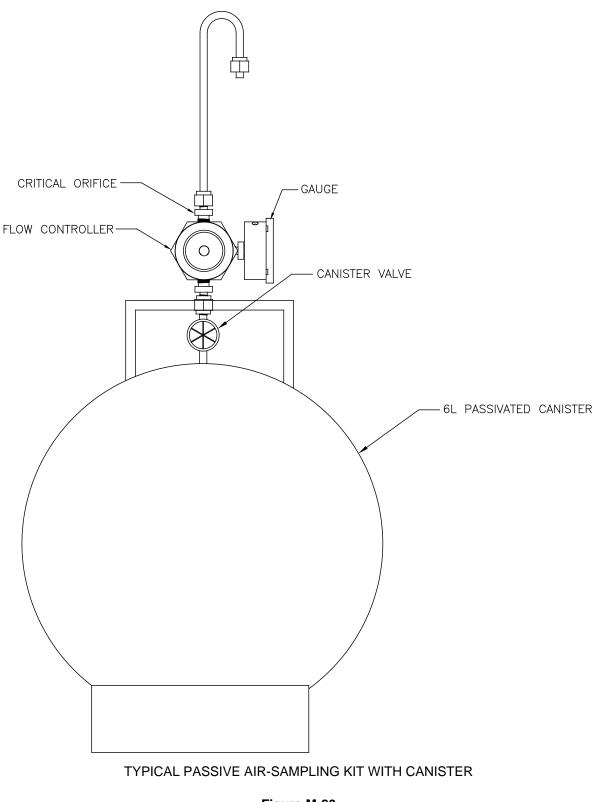


Figure M-80 VOC Monitoring System Design

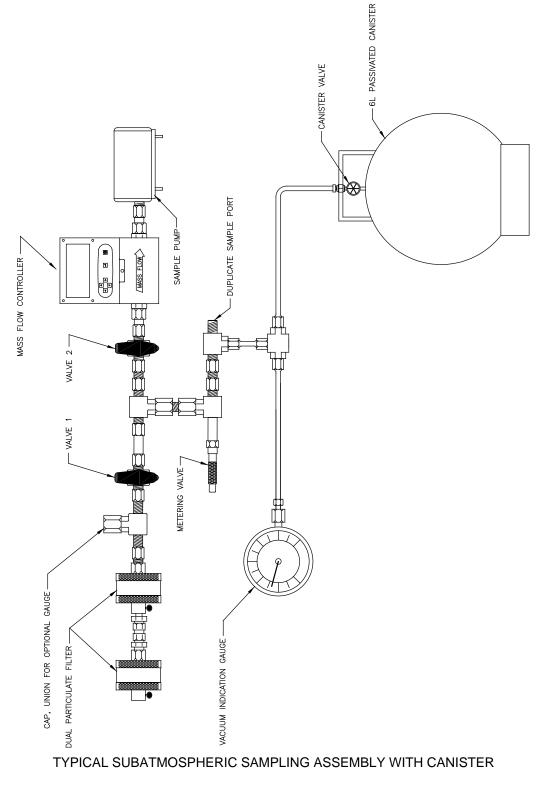


Figure M-81 VOC Monitoring System Design (continued)

1

ATTACHMENT N

VOLATILE ORGANIC COMPOUND MONITORING PLAN

ATTACHMENT N

VOLATILE ORGANIC COMPOUND MONITORING PLAN

TABLE OF CONTENTS

N-1	Introdu N-1a N-1b	iction Background Objectives of the Volatile Organic Compound Monitoring Plan	5	
N-2	Target	t Volatile Organic Compounds		
N-3	Monito N-3a	ring Design Sampling Locations N-3a(1) Sampling Locations for Repository VOC Monitoring	7	
		N-3a(2) Sampling Locations for Disposal Room VOC Monitoring	.7	
	N-3b N-3c N-3d	Analytes to Be Monitored Sampling and Analysis Methods Sampling Schedule N-3d(1) Sampling Schedule for Repository VOC Monitoring	8 9	
		N-3d(2) Sampling Schedule for Disposal Room VOC Monitoring	.9	
	N-3e	Data Evaluation and Reporting N-3e(1) Data Evaluation and Reporting for Repository VOC Monitoring	10 10	
		N-3e(2) Data Evaluation and Reporting for Disposal Room VOC Monitoring	12	
N-4	Sampli N-4a	ing and Analysis Procedures Sampling Equipment N-4a(1) Sample Canisters	12	
		N-4a(2) Sample Collection Units	13	
		N-4a(3) Sample Tubing	13	
	N-4b N-4c N-4d N-4e	Sample Collection Sample Management Maintenance of Sample Collection Units Analytical Procedures	14 14	
N-5	Quality	Assurance	15	
	N-5a Sensiti	Quality Assurance Objectives for the Measurement of Precision, Accuracy, vity, and Completeness N-5a(1) Evaluation of Laboratory Precision		
		N-5a(2) Evaluation of Field Precision	16	
		N-5a(3) Evaluation of Laboratory Accuracy	17	
		N-5a(4) Evaluation of Sensitivity	17	
		N-5a(5) Completeness	17	
	N-5b N-5c N-5d	Sample Handling and Custody Procedures Calibration Procedures and Frequency Data Reduction, Validation, and Reporting	18	

	N-5e	Performance and System Audits	18
		Preventive Maintenance	
	N-5g	Corrective Actions	20
		Records Management	
N-6		ences	

LIST OF TABLES

Table

Title

Table N-1 Target Analytes and Methods for Repository VOC (Station VOC-C and VOC-D) Monitoring and Disposal VOC Room <u>VOC</u> Monitoring

Table N-2 Quality Assurance Objectives for Accuracy, Precision, Sensitivity, and Completeness

LIST OF FIGURES

Figure Title

Figure N-1 Repository VOC Monitoring Locations

Figure N-2 VOC Monitoring System Design

Figure N-3 Typical Disposal Room VOC Monitoring Locations

Figure N-4 Disposal Room Sample Head Arrangement

1		ACRONYMS, ABBREVIATIONS, AND
2	ARA	additional requested analyte
3	BS/BSD	blank spike/blank spike duplicate
4	CFR	Code of Federal Regulations
5	CH	<u>contact</u> Contact-handled
6	CRQL	contract-required quantitation limit
7	DOE	U.S. Department of Energy
8	DRVMP	Disposal Room VOC Monitoring Program
9	EDD	electronic data deliverable
10	EPA	U.S. Environmental Protection Agency
11	ft	feet
12	GC/MS	gas chromatography/mass spectrometry
13	HI	hazard index
14	HWDU	Hazardous Waste Disposal Unit
15	IUR	inhalation unit risk
16	L	liter
17	LCS	laboratory control sample
18	LPEP	Laboratory Performance Evaluation Plan
19	m	meter
20	MDL	method detection limit
21	mm	millimeter
22	MOC	Management and Operating Contractor
23	MRL	method reporting limit
24	mtorr	
25	NIST	National Institute of Standards and Technology
26	NMAC	New Mexico Administrative Code
27	NMED	New Mexico Environment Department
28	PASK	passive air- <u>-</u> sampling kit
29	ppbv	parts per billion by volume
30	ppmv	parts per million by volume
31	<u>PT</u>	<u>proficiency testing</u>
32	QA	quality assurance
33	QAPjP	Quality Assurance Project Plan
34	QC	quality control

MO D UNITS

1 2 3 4	RfC RH RPD RVMP	reference concentration remote-handled relative percent difference Repository VOC Monitoring Program
5	SOP	standard operating procedure
6 7	TIC TRU	tentatively identified compound transuranic
8	VOC	volatile organic compound
9	WIPP	Waste Isolation Pilot Plant

ATTACHMENT N

1

2

VOLATILE ORGANIC COMPOUND MONITORING PLAN

3 <u>N-1 Introduction</u>

This Permit Attachment N describes the monitoring plan for volatile organic compound (VOC) 4 emissions from transuranic (TRU) mixed waste that may be entrained in the exhaust air from 5 the U.S. Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Underground 6 Hazardous Waste Disposal Units (HWDUs) during the disposal phase at the facility. The 7 purpose of VOC monitoring is to ensure compliance with the VOC action levels and limits 8 specified in Permit Part 4. This VOC monitoring plan consists of two programs: (1) the 9 Repository VOC Monitoring Program (RVMP), which assesses compliance with the action levels 10 in Permit Part 4, Section 4.6.2.3; and (2) the Disposal Room VOC Monitoring Program 11 (DRVMP) (includes ongoing disposal room VOC monitoring), which assesses compliance with 12 the disposal room action levels and limits in Permit Part 4, Tables 4.6.3.2 and 4.4.1. This plan 13 includes the monitoring design, a description of sampling and analysis procedures, quality 14 assurance (QA) objectives, and reporting activities. 15

16 <u>N-1a Background</u>

17 The Underground underground HWDUs are located 2,150 feet (ft) (655 meters [m]) below

18 ground surface at the WIPP facility, in the WIPP underground. As defined for this Permit, an An

¹⁹ Underground <u>underground</u> HWDU is a single excavated panel consisting of seven rooms and

two access drifts designated for disposal of contact-handled (CH) and remote-handled (RH)

transuranic (TRU) TRU mixed waste. Each room is approximately 300 ft (91 m) long, 33 ft (10

m) wide, and 13 ft (4 m) high. Access drifts connect the rooms and have the same cross section. The Permittees shall dispose of TRU mixed waste in Underground-underground

section. The Permittees shall dispose of TRU mixed waste in
 HWDUs designated as Panels 1 through 8.

²⁵ This plan addresses the following elements:

- 1. Rationale for the design of the VOC monitoring programs, based on:
- Possible pathways from the WIPP underground HWDUs during the active life of the • 27 facility. 28 • Demonstrating compliance with the disposal room limits by monitoring VOCs in 29 underground disposal rooms, 30 Demonstrating compliance with the ambient air monitoring action levels by 31 • monitoring VOC emissions on the surface, 32 VOC sampling operations at the WIPP facility, and • 33 Optimum locations for sampling. • 34
- 2. Descriptions of the specific elements of the VOC monitoring programs, including:

• The type of monitoring conducted,
Sampling locations
• The monitoring interval _*
 The specific hazardous constituents monitored.
 VOC monitoring schedule_±
 Sampling equipment_±
 Sampling and analytical techniques_±
 Data recording/reporting procedures, and
 Notification and action levels for remedial action.
The technical basis for Disposal Room VOC Monitoring is discussed in detail in the Technical Evaluation Report for Room-Based VOC Monitoring (WRES, 2003).
N-1b Objectives of the Volatile Organic Compound Monitoring Plan
The CH and RH TRU mixed waste disposed in the WIPP Underground underground HWDUs contain VOCs which could be released from <u>the WIPP underground facility</u> during the disposal phase of the project. This Plan describes how:
• VOCs released from waste panels will be monitored to confirm that the running annual average risk to the non-waste surface worker due to VOCs in the air emissions from the Underground underground HWDUs do not exceed the action levels identified in Permit Part 4, Section 4.6.2.3- and calculated from measured VOC concentrations using risk factors identified in Table 4.6.2.3- Appropriate remedial action, as specified in Permit Section 4.6.2.4, will be taken if the action levels in Permit Part 4, Section 4.6.2.3 are reached.
• The VOCs released from waste containers in disposal rooms will be monitored to confirm that the concentration of VOCs in the air of closed and active rooms in active panels do not exceed the VOC disposal room limits identified in Permit Part 4, Table 4.4.1. Appropriate remedial action, as specified in Permit Part 4, Section 4.6.3.3, will be taken if the original sample results are greater than or equal to the action levels in Permit Part 4, Table 4.6.3.2.
N-2 Target Volatile Organic Compounds
The target VOCs for repository monitoring (Station VOC-C and VOC-D) and disposal room

The type of monitoring conducted,

•

31 monitoring are presented in Table N-1.

These target VOCs were selected because together they represent approximately 99 percent of the carcinogenic risk due to air emissions of VOCs.

1 <u>N-3 Monitoring Design</u>

2 Detailed design features of this plan are presented in this section. This plan uses available

3 sampling and analysis techniques to measure VOC concentrations in air. Subatmospheric

4 sample collection units are used in the Repository and Disposal Room VOC Monitoring

5 Programs. These sample collection units are described in greater detail in Section N-4a(2).

6 <u>N-3a Sampling Locations</u>

Air samples will be collected at the WIPP facility to quantify airborne VOC concentrations as
 described in the following sections.

9 N-3a(1) Sampling Locations for Repository VOC Monitoring

Mine ventilation air, which could potentially be impacted by VOC emissions from the 10 Underground-underground HWDUs identified as Panels 1 through 8, will exit the underground 11 through the Exhaust Shaft.- Building 489 has been identified as the location of the maximum 12 non-waste surface worker exposure. Air samples will be collected from Station VOC-C located 13 at the west air intake for Building 489 (Figure M-77N-1) to quantify VOCs in the ambient air. 14 Background VOCs will be measured by sampling from Station VOC-D located at groundwater 15 pad WQSP-4 (Figure M-77N-1).- This pad is located approximately one mile southeast (upwind 16 based on the predominant wind direction) of the Exhaust Shaft within the WIPP facility 17 boundary. 18

19 <u>N-3a(2)</u> Sampling Locations for Disposal Room VOC Monitoring

20 For purposes of compliance with Section 310 of Public Law 108-447, the VOC-monitoring of

airborne VOCs in underground disposal rooms in which waste has been is emplaced will be

22 performed as follows (Figures M-78 and M-79):

- A sample <u>Sample heads</u> will be installed, prior to the certification of a Panel, in inside the disposal room behind the exhaust drift bulkhead and at the inlet side of the disposal room.and inlet sides of each disposal room, with the exception of Room 1. An inlet sample head will not be installed in Room 1 because panel closure will commence once Room 1 is filled.
- 28
 2. Sampling at the exhaust side location is initiated when TRU mixed waste will be is
 29 emplaced in the active disposal room. Sampling is initiated at the inlet location when the
 30 active disposal room is filled.
- 31 **3.** When the active disposal room is filled, another sample head will be installed to the inlet 32 of the filled active disposal room. (Figure N-3 and N-4)
- 4. The exhaust drift bulkhead will be removed and re-installed in the next disposal room so
 disposal activities may proceed.
- 5. A ventilation barrier will be installed where the bulkhead was located in the active
 disposal room's exhaust drift. Another ventilation barrier will be installed in the active
 disposal room's air inlet drift, thereby closing that active disposal room.

6<u>3</u>. Monitoring of VOCs will continue in the now closed disposal room. Monitoring of VOCs will occur in the active disposal room and <u>all-the</u> closed disposal rooms in which waste has been emplaced until commencement of panel closure activities (i.e., completion of ventilation barriers in Room 1).

This sequence for installing sample locations will proceed in the remaining disposal rooms until
 the inlet air ventilation barrier is installed in Room 1. An inlet sampler will not be installed in
 Room 1 because disposal room sampling proceeds to the next panel.

8 N-3b Analytes to Be Monitored

1

2

3

4

The VOCs that have been identified for repository and disposal room VOC monitoring are listed 9 in Table N-1. The analysis will focus on routine detection and quantification of these target 10 analytes in collected samples. As part of the analytical evaluations, the presence of other 11 compounds (i.e., non-target VOCs) will also be monitored. Some non-target VOCs may be 12 included on the laboratory's target analyte list as additional requested analytes (ARAs) to gain a 13 better understanding of potential concentrations and associated risk. The analytical laboratory 14 will be directed to calibrate for ARAs, when necessary.- The analytical laboratory will also be 15 directed to classify and report other non-target VOCs as tentatively identified compounds (TICs) 16 when tentative identification can be made.- The evaluation of TICs in original samples will 17 18 include those concentrations that are ≥ 10 percent of the relative internal standard.- The evaluation of ARAs only includes concentrations that are greater than or equal to the MRLs 19 listed in Table N-2. 20

Non-target VOCs classified as ARAs or TICs meet the following criteria: (1) are listed in 21 Appendix VIII of 40 Code of Federal Regulations (CFR) Part 261 (incorporated by reference in 22 20.4.1.200 New Mexico Administrative Code (NMAC)), and (2) are detected in 10 percent or 23 more of any original VOC monitoring samples collected over a 12-month timeframe. Non-target 24 25 VOCs will be added, as applicable, to the analytical laboratory target analyte list for both the repository and disposal room VOC monitoring programs, unless the Permittees can justify their 26 exclusion.- Non-target VOCs reported as "unknown" by the analytical laboratory are not 27 evaluated due to indeterminate identifications. 28

Information regarding additional Additional requested analytes and TICs detected in the 29 repository and disposal room VOC monitoring programs will be placed in the WIPP Operating 30 Record and reported to the New Mexico Environment Department (NMED) in the Semi-Annual 31 VOC Monitoring Report as specified in Permit Part 4, Section 4.6.2.2. As applicable, the 32 Permittees will also report the justification for exclusion of the ARA or TIC from the target 33 analyte list (e.g., the compound does not contribute to more than one percent of the risk; the 34 compound persists in the background samples at similar concentrations).- If new targets are 35 required, the Permittees will submit the appropriate permit modification annually (in October) to 36 update Table 4.6.2.3 to include the new analyte and associated recommended U.S. 37 Environmental Protection Agency (EPA) risk values for the inhalation unit risk (IUR) and 38 reference concentration (RfC).- Added compounds will be included in the risk assessment 39 described in Section N-3e(1). 40

41 N-3c Sampling and Analysis Methods

42 The VOC monitoring programs include a comprehensive VOC monitoring program established

43 at the facility; equipment, training, and documentation are already in place.

The sampling methods used for VOC monitoring are based on the concepts contained in the
 EPA Compendium Method TO-15 (EPA, 1999). The TO-15 sampling concept uses 6-liter
 passivated stainless-steel canisters to collect integrated air samples at each sample location.
 This conceptual method will be used as a reference for collecting the samples at <u>the</u> WIPP
 <u>facility</u>. The samples will be analyzed using gas chromatography/mass spectrometry (**GC/MS**)

- 6 under an established QA/quality control (**QC**) program. Laboratory analytical procedures have
- been developed based on the concepts contained in both TO-15 and SW-846 Method 8260B.
- 8 Section N-5 contains additional QA/QC information for this project.

The TO-15 method is an EPA-recognized sampling concept for VOC sampling and speciation. It
 can be used to provide subatmospheric samples, integrated samples, or grab samples,- as well
 as compound quantitation for a broad range of concentrations. This sampling technique is also
 viable for use while analyzing the sample using other EPA methods such as <u>SW-846 Method</u>
 8260B.

For subatmospheric sampling, air is collected in an initially evacuated passivated canister. 14 When the canister is opened to the atmosphere, the differential pressure causes the sample to 15 flow into the canister.- Flow rate and duration are regulated with a flow-restrictive inlet and flow 16 controller.- The air will pass through a particulate filter to prevent sample and equipment 17 contamination.- Passivated sampling equipment components are used to inhibit adsorption of 18 compounds on the surfaces of the equipment. The required Method Reporting Limit (MRL) for 19 the RVMP is 0.2 parts per billion by volume (**ppbv**) in SCAN mode and 0.1 ppbv in SIM mode. 20 Consequently, low concentrations can be measured.- The required MRL for DRVMP is 500 21 ppbv (0.5 parts per million by volume (**ppmv**)) to allow for reliable quantitation. The MRL is a 22 function of instrument performance, sample preparation, sample dilution, and all-steps involved 23 in the sample analysis process.- The DRVMP will employ sample collection units that will 24 provide a subatmospheric sample within a short duration (less than 1 hour). Passivated 25 sampling lines will be installed in the disposal room as described in Section N-3a(2) and 26 maintained (to the degree possible) after- the room is closed, until the panel associated with the 27 room is closed. The independent lines will run from the sample inlet point to a sampling manifold 28 located in an area accessible to sampling personnel. 29

30 N-3d Sampling Schedule

The Permittees will perform sampling on the following schedule in accordance with standard operating procedures.

33 <u>N-3d(1)</u> Sampling Schedule for Repository VOC Monitoring

Routine collection of a 24-hour time-integrated sample will be conducted two times per week.

- 35 The RVMP sampling will continue until the certified closure of the last Underground
- 36 <u>underground</u> HWDU.

37 N-3d(2) Sampling Schedule for Disposal Room VOC Monitoring

The disposal room sampling in open panels will occur once every two weeks, unless the need to

³⁹ increase the frequency to weekly occurs in accordance with Permit Section 4.6.3.3.

- Beginning with Panel 3, disposal room sampling in filled panels will occur monthly until final 1
- panel closure unless an explosion-isolation wall is installed. The Permittees will sample VOCs in 2
- Room 1 of each filled panel. 3
- N-3e Data Evaluation and Reporting 4

N-3e(1) Data Evaluation and Reporting for Repository VOC Monitoring 5

When the Permittees receive laboratory analytical data from an air--sampling event, the data will 6 7 be validated as specified in Section N-5d. After obtaining validated data from an original surface VOC monitoring sample obtained during an air samplingair-sampling event, the data will be 8 evaluated to determine whether the VOC emissions from the Underground-underground 9 HWDUs exceed the action levels in Permit Part 4, Section 4.6.2.3. The values are calculated in 10 terms of excess cancer risk for compounds believed to be carcinogenic and in terms of a hazard 11 index (HI) for non-carcinogens using the following stepsas follows: 12

Step 1: Calculate the carcinogenic risk (risk due to exposure to target) for the non-waste surface 13 worker (for each target VOC) using the following equation: 14

$$R_{VOCj} = \frac{Conc_{VOCj} \times EF \times ED \times IUR_{VOCj} \times 1000}{AT}$$
(N-1)

15

Where: 16

- R_{VOCj} = Risk due to exposure to target VOC_j 17
- 18
- $Conc_{VOC_j}$ = Concentration target VOC_j at the receptor (<u>milligram per cubic meter (mg/m³)</u>), 19 calculated as the concentration at VOC-C (mq/m^3) – the concentration at VOC-D (mq/m^3)
- 20 *EF* = *Exposure frequency (hours/year)* = 1,920 *hours per year*
- 21 ED = Exposure duration, years = 10 years
- IUR_{VOCj} = Inhalation unit risk factor from Table 4.6.2.3 (<u>microgram per cubic meter</u>) 22 23 $(\mu q/m^3)^{-1}$
- 24 AT = Averaging time for carcinogens, = 613,200 hours based on 70 years
- 25 $1,000 = \mu q/mq$
- Step 2: Calculate the The total carcinogenic risk. This is then the sum of the risk due to each 26 carcinogenic target VOC: 27

28
$$\frac{\text{Total Carcinogenic Risk} = \sum_{j=1}^{m} R_{VOC_j} \text{Total Carcinogenic Risk} = \sum_{j=1}^{m} R_{VOC_j}$$
(N-2)

- Where: 29
- 30 Total Risk must be less than 10⁻⁵

m = the number of carcinogenic target VOCs

Step 3: Calculate The formula for calculating the non-carcinogenic hazard index is similar: 2

$$HI_{VOC_{j}} = \frac{Conc_{VOC_{j}} \times EF \times ED}{AT \times RfC_{VOC_{j}}}$$
(N-3)

3

11

17

1

Where: 4

 HI_{VOC_j} = Hazard Index for exposure to target VOC_j 5

6

nca

 $Conc_{VOC_j}$ = Concentration target VOC_j at the receptor (mg/m³), calculated as the 7 concentration at VOC-C (mq/m^3) – the concentration at VOC-D (mq/m^3)

8 EF = Exposure frequency (hours/year) = 1,920 hours per year

¹⁰
$$KfC_{VOC_j}$$
 = Reference concentration from Table 4.6.2.3 (mg/m³)

- AT = Averaging time for non-carcinogens, = 87,600 hours, based on exposure duration
- Step 4: Calculate the The total hazard. This is the sum of the hazard index due to each non-12 carcinogenic target VOC: 13

14 Total Hazard Index =
$$\sum_{j=1}^{m} HI_{VOC_j}$$
 (N-4)

Where: 15

16 Hazard Index must be less than or equal to 1.0

m = the number of non-carcinogenic target VOCs

The total carcinogenic risk (Equation N-2) and the total HI (Equation N-4) calculated from the 18 surface VOC concentrations for each sampling event will be compared directly to the action 19 levels in Permit Part 4, Section 4.6.2.3. This will establish whether the combined effect of any of 20 the concentrations of VOCs in the emissions from the Underground underground HWDUs 21 exceeded the risk and HI action levels at the time of the sampling. 22

As specified in Permit Part 4, the Permittees shall notify the Secretary in writing, within seven 23 calendar days of obtaining validated analytical results, whenever the risk or HI exceeds the 24 action levels specified in Permit Part 4, Section 4.6.2.3. 25

The surface VOC concentrations for each target VOC that is calculated for each sampling event 26 will then be averaged with the surface VOC- concentrations calculated for the air-sampling 27 events conducted during the previous 12 months. This will be considered the running annual 28 average concentration for each target VOC. The running annual average risk and HI will be 29

- 1 compared to action levels specified in Permit Part 4, Section 4.6.2.3.- When a VOC is added to
- the target analyte list, the running annual average concentration will be calculated using all
 available data.
- As specified in Permit Part 4, the Permittees shall notify the Secretary in writing, within seven calendar days of obtaining validated analytical results, whenever the running annual average risk or HI (calculated after each sampling event) exceeds the action levels specified in Permit Part 4, Section 4.6.2.3.
- 8 The Permittees will maintain a database with the VOC air-<u></u>sampling data and the results will be 9 reported to the Secretary as specified in Permit Part 4.

10 N-3e(2) Data Evaluation and Reporting for Disposal Room VOC Monitoring

- When the Permittees receive laboratory analytical data from an air-sampling event, the data will be validated as specified in Section N-5d. The validated data will be evaluated to determine whether the VOC concentrations in the air of any closed room, the active open room, or the immediately adjacent closed room exceeded the Action Levels-action levels for DRVMP specified in Permit Part 4, Table 4.6.3.2.
- The Permittees shall notify the Secretary in writing, within seven calendar days of obtaining validated analytical results, whenever the concentration of any VOC specified in Permit Part 4,
- Table 4.4.1 exceeds the action levels specified in Permit Part 4, Table 4.6.3.2.
- The Permittees shall submit to the Secretary the Semi-Annual VOC Monitoring Report specified in Permit Section 4.6.2.2 that also includes results from disposal room VOC monitoring.
- 21 N-4 Sampling and Analysis Procedures
- This section describes the equipment and procedures that will be implemented during sample collection and analysis activities for VOCs at <u>the WIPP facility</u>.
- 24 N-4a Sampling Equipment
- The sampling equipment that will be used includes: 6-liter (L) stainless-steel passivated canisters, passive air-<u>sampling kits</u> (**PASKs**), subatmospheric sampling assemblies, passivated stainless-steel tubing, and one or more in-line filters. A discussion of each of these items is
- 28 presented below.

29 <u>N-4a(1) Sample Canisters</u>

Six-liter, stainless-steel canisters with passivated interior surfaces will be used to collect and 30 store all ambient air and disposal room samples for VOC analyses collected as part of the 31 monitoring processes. These canisters will be cleaned and certified (batch certification 32 acceptable for disposal room monitoring) prior to their use, in a manner similar to that described 33 by Compendium Method TO-15. The canisters will be certified clean to below the required 34 reporting limits for the VOC analytical method for the target VOCs. The vacuum of certified 35 clean canisters will be verified as adequate upon initiation of a sample cycle as described in 36 37 standard operating procedures (SOPs).- The sample canisters are initially evacuated at the analytical laboratory to <0.05 millimeter of mercury (mm Hg) (50 millitorr). 38

1 <u>N-4a(2)</u> Sample Collection Units

2 The sample collection unit for surface VOC samples is a commercially available PASK

3 comprised of components that regulate the rate and duration of air flow into a sample canister.

4 It can be operated either manually, using canister valves, or unattended, using a programmable 5 timer.

- 6 The sample collection unit for disposal room VOC monitoring is a subatmospheric sampling
- 7 assembly that regulates the rate and duration of air flow into a sample canister.- The
- 8 subatmospheric sampling assembly also allows for purging of sample lines to ensure that a
- 9 representative sample is collected.

Sample collection units will use passivated components for the sample flow path.- When sample canisters installed on sample collection units are opened to the atmosphere, the differential
 pressure causes the sample to flow into the canister at a regulated rate.- By the end of each
 sampling period, the canisters will be near atmospheric pressure.- Detailed instructions on
 sample collection will be given in SOPs. A conceptual diagram of the VOC sample collection
 units are provided in Figures M-80 and M-81N-2.

16 N-4a(3) Sample Tubing

17 The tubing used as a sample path is comprised of passivated stainless-steel to prevent the

inner walls from absorbing sample constituents and/or contaminants when they are pulled from
 the sample point to the sample collection unit.

20 N-4b Sample Collection

21 Sample collection for VOCs at the WIPP facility will be conducted in accordance with written

22 SOPs that are kept on file at the facility. -These SOPs will specify the steps necessary to ensure

the collection of samples that are of acceptable quality to meet the applicable data quality

²⁴ objectives in Section N-5.

Repository VOC samples will be 24--hour time-integrated samples for each sampling event.

Alternative sampling durations may be defined for assessment purposes and to meet the data

27 quality objectives.- The selection of sampling days will be specified in SOPs and will be

alternated from week-to-week in order to avoid potential bias created by plant operations.

29 Sample flow for the PASK will be set using an in-line mass flow controller<u>meter</u>. The flow

30 controllers-meters are initially factory-calibrated and specify a typical accuracy of better than 10

percent full scale. Additionally, each air flow controller meter is calibrated at a manufacturer specified frequency using a National Institute of Standards and Technology (NIST) primary flow

33 standard.

To verify the matrix similarity and assess field-<u>sampling</u> precision, field duplicate samples will be collected (two canisters filled simultaneously) for each VOC monitoring program at an overall frequency of at least 5 five percent (see Section N-5a).

Prior to collecting the active open disposal room and closed room samples, the sample lines are

³⁸ purged to ensure that the air collected is not air that has been stagnant in the tubing. This is

1 important in regard to the disposal room sample because of the long lengths of tubing

2 associated with these samples.

3 <u>N-4c Sample Management</u>

- Field-_sampling data sheets will be used to document the sampler conditions under which each
- sample is collected. These data sheets have been developed specifically for VOC monitoring at
- 6 the WIPP facility. The individuals assigned to collect the specific samples will be required to fill
- 7 in all of the appropriate sample data and to maintain this record in sample logbooks. The

8 program team leader will review these forms for each sampling event.

- 9 All sample containers will be marked with identification at the time of collection of the sample. A
- Request-for-Analysis Form will be completed to identify the sample canister number(s), sample
 type and type of analysis requested.
- All samples will be maintained, and shipped if necessary, at ambient temperatures. Collected samples will be transported in appropriate containers. Prior to leaving the underground for analysis, sample containers may undergo radiological screening, which will ensure that contaminated samples or equipment will not be transported to the surface. Samples will not be accepted by the receiving laboratory personnel unless they are properly labeled and sealed to ensure a tamper-free shipment.
- An important component of the sampling program is a demonstration that collected samples were obtained from the locations stated and that they reached the laboratory without alteration. To satisfy this requirement, evidence of collection, shipment, laboratory receipt, and custody will be documented with a completed Chain-of-Custody Form. Chain-of-custody procedures will be followed closely, and additional requirements imposed by the laboratory for sample analysis will be included as necessary.
- 24 Individuals collecting samples will be responsible for the initiation of custody procedures. The chain of custody will include documentation as to the canister certification, location of sampling 25 event, time, date, and the name of the individual handling the samples. Deviations from 26 procedure will be considered variances. Variances must be preapproved by the program 27 manager and recorded in the project files. Unintentional deviations, sampler malfunctions, and 28 other problems are nonconformances. Nonconformances must be documented and recorded in 29 the project files. All field logbooks/data sheets must be incorporated into the Permittees' WIPP's 30 records management program. 31

32 <u>N-4d Maintenance of Sample Collection Units</u>

Periodic maintenance for sample collection units and associated equipment will be performed as needed. This maintenance may include cleaning, replacement of damaged or malfunctioning parts, and leak testing. Additionally, complete spare sample collection units will be maintained on-site to minimize downtime because of equipment malfunction.

- 37 <u>N-4e Analytical Procedures</u>
- Analytical procedures used in the analysis of VOC samples from canisters are based on
 concepts contained in Compendium Method TO-15 (EPA, 1999) and in SW-846 Method 8260B
- 40 (EPA, <u>2015</u>1996).

1 Analysis of samples will be performed by a certified laboratory. Methods will be specified in

- 2 procurement documents and will be selected to be consistent with Compendium Method TO-15
- 3 (EPA, 1999) or EPA recommended procedures in SW-846 (EPA, <u>2015</u>1996). Additional detail
- 4 on analytical techniques and methods will be given in laboratory SOPs.

5 The Permittees will establish the criteria for laboratory selection, including the stipulation that 6 the laboratory follow the procedures specified in the appropriate Air Compendium or SW-846

the laboratory follow the procedures specified in the appropriate Air Compendium or SW-846
 method and that the laboratory follow EPA protocols. The selected laboratory shall demonstrate,

through laboratory SOPs, that it will follow appropriate EPA SW-846 requirements and the

requirements specified by the EPA Air Compendium protocols. The laboratory shall also provide

documentation to the Permittees describing the sensitivity of laboratory instrumentation. This

documentation will be retained in the facility operating <u>Operating record Record</u> and will be

available for review upon request by NMED.

13 The SOPs for the laboratory currently under contract will be maintained in the operating

¹⁴ Operating record <u>Record</u> by the Permittees. The Permittees will provide NMED with an initial set

¹⁵ of applicable laboratory SOPs for information purposes, and provide NMED with any-updated

16 SOPs on an annual basis by January 31<u>upon request</u>.

17 Data validation will be performed by the Permittees. Copies of the data validation report will be

- 18 kept on file in the operating <u>Operating record</u> for review upon request by NMED.
- 19 N-5 Quality Assurance

The QA activities for the VOC monitoring programs will be conducted in accordance with the 20 documents: EPA Guidance for Quality Assurance Project Plans QA/G-5 (EPA, 2002) and the 21 EPA Requirements for Preparing Quality Assurance Project Plans, QA/R-5 (EPA, 2001). The 22 QA criteria for the VOC monitoring programs are listed in Table N-2. This section addresses the 23 methods to be used to evaluate the components of the measurement system and how this 24 evaluation will be used to assess data quality. The QA limits for the sampling procedures and 25 laboratory analysis shall be in accordance with the limits set forth in the specific EPA Method 26 referenced in standard operating procedures employed by either the Permittees or the 27 laboratory. The Permittees standard operating procedures will be in the facility Operating 28 Record and available for review by NMED at anytimeupon request. The laboratory standard 29 operating procedures will also be in the facility Operating Record and will be supplied to the 30 NMED as indicated in Section N-4e. 31

N-5a Quality Assurance Objectives for the Measurement of Precision, Accuracy, Sensitivity, and Completeness

³⁴ QA objectives for this plan will be defined in terms of the following data quality parameters.

Precision. For the duration of this program, precision will be defined and evaluated by the RPD
 values calculated between field duplicate samples and between laboratory duplicate samples.

$$RPD = \left(\frac{(A-B)}{(A+B)/2}\right) * 100 \ RPD = \frac{(A-B)}{(A+B)/2} \times 100$$
 (N-5)

- 1 Where
- ² A = Original sample result
- ³ B = Duplicate sample result

Accuracy. Analytical accuracy will be defined and evaluated through the use of analytical 4 standards. Because recovery standards cannot reliably be added to the sampling stream, 5 overall system accuracy will be based on analytical instrument performance evaluation criteria. 6 These criteria will include performance verification for instrument calibrations, laboratory control 7 samples, sample surrogate recoveries (when required by method or laboratory SOPs), and 8 sample internal standard areas. Use of the appropriate criteria as determined by the analytical 9 method performed, will constitute the verification of accuracy for target analyte quantitation 10 (i.e., quantitative accuracy). Evaluation of standard ion abundance criteria for 11 bromofluorobenzeneBFB will be used to evaluate the accuracy of the analytical system in the 12 identification of targeted analytes, as well as the evaluation of unknown contaminants (i.e., 13 qualitative accuracy). 14

Sensitivity. Sensitivity will be defined by the required MRLs for the program. Attainment of required MRLs will be verified by the performance of statistical method detection limit (MDL)

17 studies in accordance with 40 Code of Federal Regulations § CFR Part 136. The MDL

represents the minimum concentration that can be measured and reported with 99 percent

confidence that the analyte concentration is greater than zero. An MDL study will be performed

20 by the program analytical laboratory prior to sampling and analysis, and annually thereafter.

Completeness. Completeness will be defined as the percentage of the ratio of the number of valid sample results received (i.e., those which meet data quality objectives) versus the total number of samples collected. Completeness may be affected, for example, by sample loss or destruction during shipping, by laboratory sample handling errors, or by rejection of analytical data during data validation.

26 <u>N-5a(1) Evaluation of Laboratory Precision</u>

27 Laboratory sample duplicates and blank spike/blank spike duplicates (**BS/BSD**) will be used to evaluate laboratory precision. QA objectives for laboratory precision are listed in Table N-2, and 28 are based on precision criteria proposed by the EPA for canister sampling programs (EPA, 29 1991). These values will be appropriate for the evaluation of samples with little or no matrix 30 effects. Because of the potentially high level of salt-type aerosols in the WIPP underground 31 environment, the analytical precision achieved for WIPP samples may vary with respect to the 32 EPA criteria. RPDs for BS/BSD analyses will be tracked through the use of control charts. RPDs 33 obtained for laboratory sample duplicates will be compared to those obtained for BS/BSDs to 34 ascertain any sample matrix effects on analytical precision. BS/BSDs and laboratory sample 35 duplicates will be analyzed at a frequency of 10 percent, or one per analytical lot, whichever is 36 37 more frequent.

38 <u>N-5a(2) Evaluation of Field Precision</u>

- ³⁹ Field duplicate samples will be collected at a frequency of at least 5<u>five</u> percent for the RVMP
- and at least <u>5 five</u> percent for the DRVMP. The data quality objective for field precision is 35
- 41 percent for each set of field duplicate samples.

1 <u>N-5a(3) Evaluation of Laboratory Accuracy</u>

Quantitative analytical accuracy will be evaluated through performance criteria on the basis of 2 (1) relative response factors generated during instrument calibration, (2) analysis of laboratory 3 control samples (LCS), and (3) recovery of internal standard compounds. The criteria for the 4 initial calibration (5<u>five</u>-point calibration) is < 30 percent relative standard deviation for target 5 analytes. After the successful completion of the 5 five point calibration, it is sufficient to analyze 6 only a midpoint standard for every 24 hours of operation. The midpoint standard will pass a 30 7 percent difference acceptance criterion for each target compound before sample analysis may 8 begin. 9 10

- A blank spike or LCS is an internal QC sample generated by the analytical laboratory by spiking a standard air matrix (humid zero air) with a known amount of a certified reference gas. The reference gas will contain the target VOCs at known concentrations. Percent recoveries for the target VOCs will be calculated for each LCS relative to the reference concentrations. Objectives for percent recovery are listed in Table N-2, and are based on accuracy criteria proposed by the EPA for canister sampling programs (EPA, 1991). LCSsLaboratory control samples will be
- analyzed at a frequency of 10 percent, or one per analytical lot, whichever is more frequent.

Internal standards will be introduced into each sample analyzed, and will be monitored as a 17 verification of stable instrument performance. In the absence of any unusual interferences, 18 areas should not change by more than 40 percent over a 24-hour period. Deviations larger than 19 40 percent are an indication of a potential instrument malfunction. If an internal standard area in 20 a given sample changes by more than 40 percent, the sample will be reanalyzed. If the 40 21 percent criterion is not achieved during the reanalysis, the instrument will undergo a 22 performance check and the midpoint standard will be reanalyzed to verify proper operation. 23 Response and recovery of internal standards will also be compared between samples, LCSs, 24 and calibration standards to identify any matrix effects on analytical accuracy. 25

26 <u>N-5a(4) Evaluation of Sensitivity</u>

11

12

13

14

15

The presence of aerosol salts in underground locations may affect the MDL of the samples collected in those areas. The sample inlet of these sample collection units will be protected sufficiently from the underground environment to minimize salt aerosol interference. Up to two filters, inert to VOCs, will be installed in the sample flow path to minimize particulate interference.

The MDL for each of the target VOCs will be evaluated by the analytical laboratories before sampling begins. The initial and annual MDL evaluation will be performed in accordance with 40 *Code of Federal Regulations* <u>SCFR Part</u> 136, and with EPA/530-SW-90-021, as revised and retitled, "Project Quality Assurance and Quality Control" (Chapter 1 of SW-846) (20151996).

- 36 <u>N-5a(5) Completeness</u>
- The expected completeness for this program is greater than or equal to 95 percent. Data completeness will be tracked monthly.
- 39 <u>N-5b</u> Sample Handling and Custody Procedures
- ⁴⁰ Sample packaging, shipping, and custody procedures are addressed in Section N-4c.

1 <u>N-5c</u> Calibration Procedures and Frequency

2 Calibration procedures and frequencies for analytical instrumentation are listed in Section N-4e.

3 <u>N-5d</u> Data Reduction, Validation, and Reporting

4 Field-<u>-</u>sampling data sheets will contain documentation of all pertinent data for the sampling and

5 will at a minimum include the following; sample identification, sample location, sample collection

6 date, initial vacuum, ending vacuum, collection start and collection stop time, and flow rate and

- 7 ambient temperature.
- 8 Data validation procedures will include at a minimum, a check of all field data sheets for

⁹ completeness and correctness. Sample custody and analysis records will be reviewed by the

- analytical laboratory QA officer and the analytical laboratory supervisor at a frequency of at least
- 11 **10 percent**.

Electronic Data Deliverables (EDDs) are provided by the laboratory prior to receipt of hard 12 certified copy data packages. Electronic Data Deliverables EDDs will be evaluated within five 13 calendar days of receipt to determine if VOC concentrations are at or above action levels in 14 Permit Part 4, Section 4.6.3.2 for disposal room VOC monitoring data, or the action levels 15 specified in Permit Part 4, Section 4.6.2.3 for repository monitoring data. If the EDD indicates 16 that VOC concentrations are at or above these action levels or concentrations, the hard-certified 17 copy data package will be validated within five calendar days as opposed to the 14 calendar day 18 time frame. 19

²⁰ Data will be reported as specified in Section N-3(e) and Permit Part 4.

Acceptable data for this VOC monitoring plan will meet stated precision and accuracy criteria.

The QA objectives for precision, accuracy, and completeness as shown in Table N-2 can be

achieved when established methods of analyses are used as proposed in this plan and

standard sample matrices are being assessed.

25 <u>N-5e Performance and System Audits</u>

The Permittees will evaluate whether the monitoring systems and analytical methods are 26 functioning properly through performance and system audits.- The assessment period will be 27 determined by the Permittees. System audits will initially address start-up functions for each 28 phase of the project. These audits will consist of on-site evaluation of materials and equipment, 29 review of certifications for canisters and measurement and test equipment, review of laboratory 30 gualification and operation and, at the request of the QA officer, an on-site audit of the 31 laboratory facilities. The function of the system audit is to verify that the requirements in this 32 plan have been met prior to initiating the program. System audits will be performed at or shortly 33 after the initiation of the VOC monitoring programs and on an annual basis thereafter. 34

Performance audits will be accomplished as necessary through the evaluation of analytical QC data by performing periodic site audits throughout the duration of the project, and through the introduction of third-party audit cylinders (laboratory blinds) into the analytical sampling stream. Performance audits will also include a surveillance/review of data associated with canister certifications and measurement and test equipment, a project-specific technical audit of field operations, and a laboratory performance audit. Field logs, logbooks, and data sheets, as 1 applicable will be reviewed during data validation. Blind-audit canisters will be introduced once

- 2 during the sampling period. Details concerning scheduling, personnel, and data quality
- 3 evaluation are addressed in the QAPjP.

By May 1, 2016 the Permittees shall develop and implement a RVMP Laboratory Performance 4 Evaluation Plan (LPEP) that has been reviewed and approved by the Secretary prior to use, for 5 Repository VOC ambient monitoring. In addition to the timely submittal of validated data 6 packages under this LPEP to the Secretary, the results shall also be reported annually in the 7 October Semi- Annual VOC Monitoring Report. The second contract laboratory performing the 8 performance evaluation to be used for comparison to the primary contract laboratory shall use 9 the required MRLs as required in Table N-2, which are defined to be equivalent to the CRQLs. 10 Any contract laboratory involved in this program shall have a site specific quality assurance 11 project plan and an associated QA/QC program that are acceptable and aligned with EPA 12 13 guidance. The LPEP shall, at a minimum, include the following sections: 1. Table of Contents 14 2. Introduction 15 Background 16 Scope/Objectives: this section shall include comparative testing of subatmospheric 17 sampling containers, the field background canisters, and a test of the cleanliness of the 18 canister less than the SIM mode MRL in Table N-2. 19 5. Laboratory Specific SOPs 20 6. Sampling Methodologies 21 7. Analytical Methodologies 22 8. Quality Assurance Requirements 23 9. Schedules 24 10. Reporting: data packages shall contain all applicable sections found in the document 25 <u>"Statement-of-Work for the Analysis of Air Toxics from Superfund Sites" (EPA 1990).</u>

- 26 "Statement-of-Work for the Analysis of Air Toxics from Superfund Sites" (EPA 1990),
 27 Exhibit B, Section 2, "Reporting Requirements and Order of Data Deliverables" and as
- 28 approved by the Secretary.

As an alternative to the LPEP, the Permittees will notify the Secretary of their intention to require the contract laboratory to participate in proficiency testing. The Permittees will then, within 90 days, submit to the NMED for approval, a proposal for proficiency testing. If the Permittees are unable to develop a proficiency testing plan that is acceptable to the NMED, then the Permittees

- 33 will prepare and submit the LPEPhave implemented a proficiency testing (PT) plan. The
- ³⁴ proposal for proficiency testing will<u>PT plan</u> include<u>s</u> the following, as applicable:
- Specific analytical method(s).
- Schedule for proficiency testing implementation, and
- Provision for the periodic reporting of proficiency testing results and corrective actions, if
 any_±

Results of proficiency testing-<u>PT</u> will be reported in the Semi-Annual VOC Monitoring Report as
 specified in Permit Part 4, Section 4.6.2.2.

1 <u>N-5f Preventive Maintenance</u>

2 Maintenance of sample collection units is described briefly in Section N-4d Maintenance of 3 analytical equipment will be addressed in the analytical laboratory SOP.

4 <u>N-5g Corrective Actions</u>

5 If the required completeness of valid data (95 percent) is not maintained, corrective action may

⁶ be required. Corrective action for field-<u></u>sampling activities may include recertification and

7 cleaning of sample collection units, reanalysis of samples, additional training of personnel,

8 modification to field and laboratory procedures, and recalibration of measurement and test

9 equipment.

Laboratory corrective actions may be required to maintain data quality. The laboratory

11 continuing calibration criteria indicate the relative response factor for the midpoint standard will

be less than 30 percent different from the mean relative response factor for the initial calibration.

Differences greater than 30 percent will require recalibration of the instrument before samples can be analyzed. If the internal standard areas in a sample change by more than 40 percent,

can be analyzed. If the internal standard areas in a sample change by more than 40 percent,
 the sample will be reanalyzed. If the 40 percent criterion is not achieved during the reanalysis,

the instrument will undergo a performance check and the midpoint standard will be reanalyzed.

to verify proper operation. Deviations larger than 40 percent may indicate instrument

18 malfunction.

The laboratory results for samples, duplicate analyses, LCSs, and blanks should routinely be within the QC limits. If results exceed control limits, the reason for the nonconformances and appropriate corrective action must be identified and implemented.

22 <u>N-5h Records Management</u>

23 The VOC Monitoring Programs monitoring programs will require administration of record files

24 (both laboratory and field data collection files). The records control systems will provide

adequate control and retention for program-related information. Records administration,

including QA records, will be conducted in accordance with applicable DOE, MOC, and WIPP

27 <u>Project</u> requirements.

²⁸ Unless otherwise specified, VOC monitoring plan records will be retained as lifetime records.

Temporary and permanent storage of QA records will occur in facilities that prevent damage

from temperature, fire, moisture, pressure, excessive light, and electromagnetic fields. Access
 to stored VOC Monitoring Program QA Records will be controlled and documented to prevent

31 to stored VOC Monitoring Program QA Records will be controlle 32 unauthorized use or alteration of completed records

unauthorized use or alteration of completed records.

Revisions to completed records (i.e., as a result of audits or data validation procedures) may be

made only with the approval of the responsible program manager and in accordance with

applicable QA procedures. Records of project activities will be maintained at the WIPP site.

³⁶ Documentation will be available for inspection by internal and external auditors.

37 <u>N-6 Sampling and Analysis Procedures for Disposal Room VOC Monitoring in Filled Panels</u>

- 38 Disposal room VOC samples in filled panels will be collected using the subatmospheric
- ³⁹ pressure grab sampling technique described in Compendium Method TO-15 (EPA, 1999). This

- 1 method uses an evacuated passivated canister (or equivalent) that is under vacuum (0.05 mm
- 2 Hg) to draw the air sample from the sample lines into the canister. The sample lines will be
- 3 purged prior to sampling to ensure that a representative sample is collected. The passivation of
- 4 tubing and canisters used for VOC sampling effectively seals the inner walls and prevents
- 5 compounds from being retained on the surfaces of the equipment. By the end of each sampling
- 6 period, the canisters will be near atmospheric pressure.
- The analytical procedures for disposal room VOC monitoring in filled panels are the same as
 specified in Section N-4e.
- 9 N-7<u>6</u> References
- 10 40 CFR Part 136, "Guidelines Establishing Test Procedures for the Analysis of Pollutants."
- 11 Section 310 of Public Law 108-447 of the Consolidated Appropriations Act of 2005.
- 12 U.S. Environmental Protection Agency, 1991.- Contract Laboratory Program, Volatile Organics
- Analysis of Ambient Air in Canisters (Draft), EPA540/R-94-085, December 1991, Washington,
- 14 D.C.
- 15 U.S. Environmental Protection Agency. 1996. SW-846, Test Methods for Evaluating Solid
- Waste, Physical/Chemical Methods. Third Edition. Office of Solid Waste and Emergency
 Response, Washington, D.C.
- U.S. Environmental Protection Agency. 1999 Compendium Method TO-15: Determination of
 Volatile Organic Compounds (VOCs) In Air Collected in Specially-Prepared Canisters and
 Analyzed by Gas Chromatography/Mass Spectrometry_(GC/MS), EPA 625/R-96/010b. Center
 for Environmental Research Information, Office of Research and Development, Cincinnati, OH,
 January 1999.
- U.S. Environmental Protection Agency. 2001. *EPA Requirements for Quality Assurance Project Plans, QA/R-5*, EPA 240/B-01/003, March 2001, Washington, D.C.
- U.S. Environmental Protection Agency. 2002. *Guidance for Quality Assurance Project Plans*,
 QA/G-5, EPA 240/R-02/009, December 2002, Washington, D.C.
- U.S. Environmental Protection Agency. 2015. SW-846, *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.* Office of Solid Waste and Emergency Response,
 Washington, D.C.
- 30 Washington Regulatory and Environmental Services, 2003. *Technical Evaluation Report for*
- 31 WIPP Room-Based VOC Monitoring.
- 32

Table N	-1			
Target Analytes and Methods for Repository VOC (Station VOC-C and VOC-D)				
Monitoring and Disposal VOC Room <u>VOC</u> Monitoring				
Target Analyte	EPA Standard Analytical Method			

Target Analyte	EPA Standard Analytical Method
Carbon tetrachloride	EPA TO-15ª
Chlorobenzene	EPA 8260B ^b
Chloroform	
1,1-Dichloroethylene	
1,2-Dichloroethane	
Methylene chloride	
1,1,2,2Tetrachloroethane	
Toluene	
1,1,1Trichloroethane	
Trichloroethylene	

^a U.S. Environmental Protection Agency, 1999, Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air- Second Edition, <u>http://www.epa.gov/ttn/amtic/airtox.html</u>

^b U.S. Environmental Protection Agency, SW-846 Test Methods for Evaluation Solid Wastes, Chemical and Physical Methods, <u>http://www.epa.gov/epaoswer/hazwaste/test/main.htm</u>https://www.epa.gov/hw-sw846/sw-846-compendium_I

Γ

Quality Assurance Objectives for Accuracy, Precision, Sensitivity, and Completene					eness		
Target Analyte	Accuracy (Percent Recovery)	(R Labo	cision PD) pratory ield	Required Repository Surface Monitoring MRL for SCAN Mode (ppbv)	Required Repository Surface Monitoring MRL for SIM Mode (ppbv)	Required Disposal Room MRL (ppbv)	Complete- ness (Percent)
Carbon tetrachloride	60 to 140	25	35	0.2	0.1	500	95
Chlorobenzene	60 to 140	25	35	0.2	0.1	500	95
Chloroform	60 to 140	25	35	0.2	0.1	500	95
1,1-Dichloroethylene	60 to 140	25	35	0.2	0.1	500	95
1,2-Dichloroethane	60 to 140	25	35	0.2	0.1	500	95
Methylene chloride	60 to 140	25	35	0.2	0.1	500	95
1,1,2,2- Tetrachloroethane	60 to 140	25	35	0.2	0.1	500	95
Toluene	60 to 140	25	35	0.2	0.1	500	95
1,1,1- Trichloroethane	60 to 140	25	35	0.2	0.1	500	95
Trichloroethylene	60 to 140	25	35	0.2	0.1	500	95

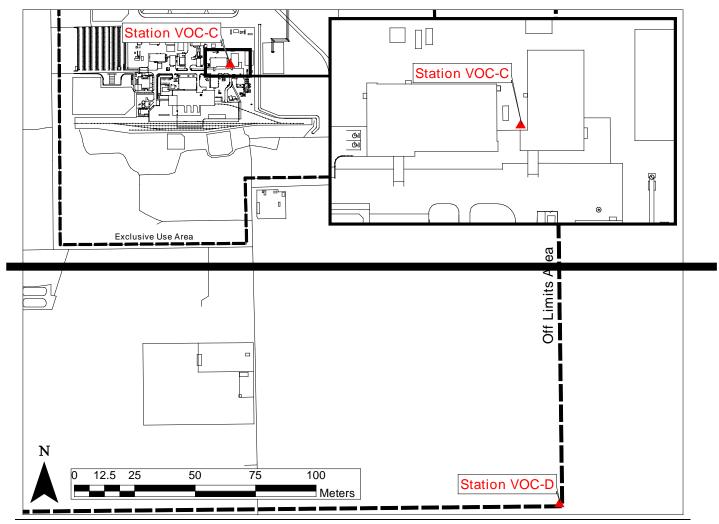
 Table N-2

 Quality Assurance Objectives for Accuracy, Precision, Sensitivity, and Completeness

MRL maximum method reporting limit for undiluted samples

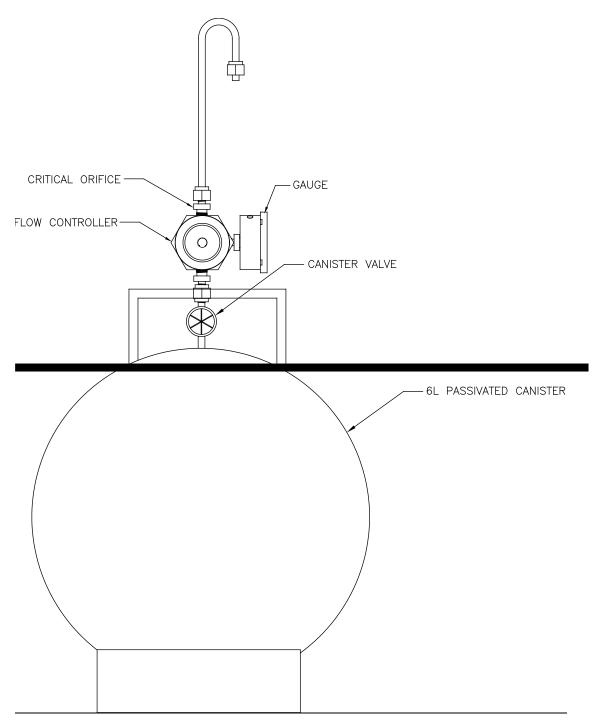
RPD relative percent difference

FIGURES



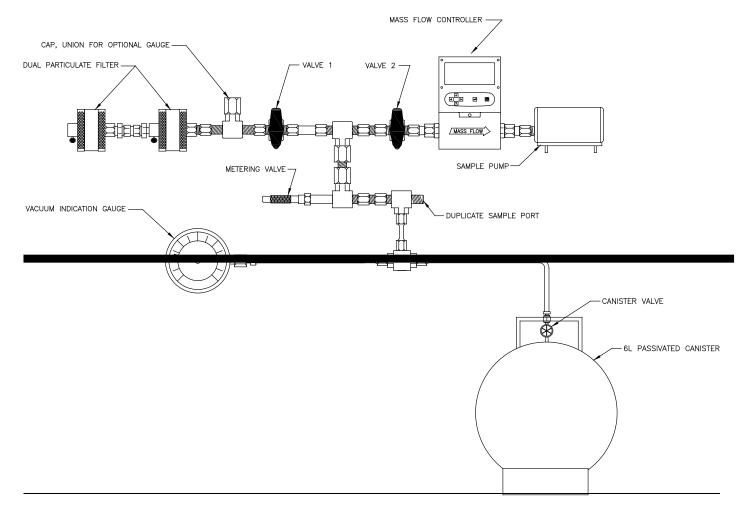
(see Figure D-1 and Figure D-1a for a detailed map and legend of the suface buildings)

Figure N-1 Repository VOC Monitoring Locations



TYPICAL PASSIVE AIR SAMPLING KIT WITH CANISTER

Figure N-2 VOC Monitoring System Design



TYPICAL SUBATMOSPHERIC SAMPLING ASSEMBLY WITH CANISTER

Figure N-2 VOC Monitoring System Design (continued)

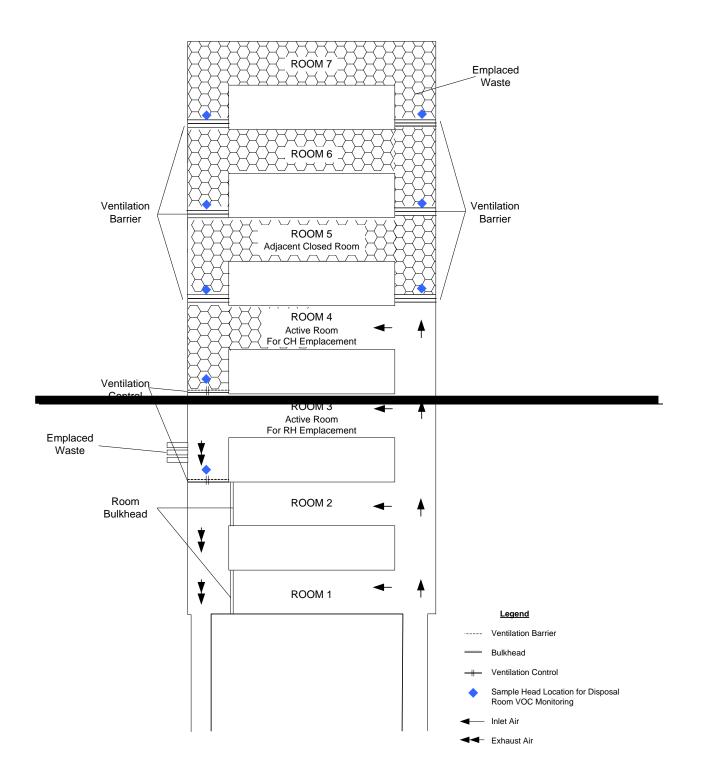
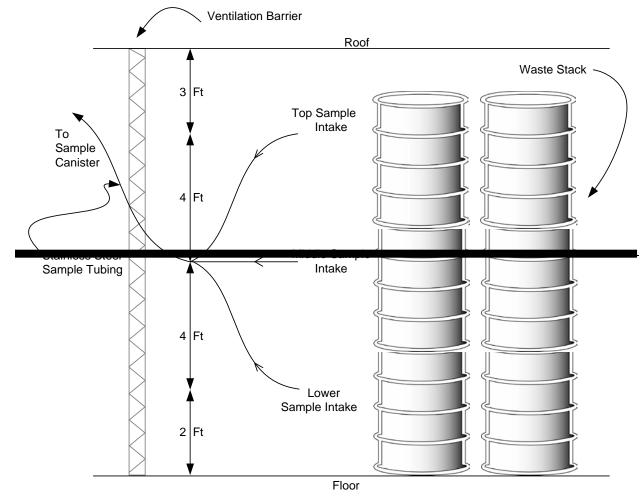


Figure N-3 Typical Disposal Room VOC Monitoring Locations



(not to scale, all measurements approximate)

Figure N-4 -Disposal Room Sample Head Arrangement

ADDENDUM N1

300-YEAR PERFORMANCE DEMONSTRATION RE-EVALUATION

ADDENDUM N1

300-YEAR PERFORMANCE DEMONSTRATION RE-EVALUATION

TABLE OF CONTENTS

N1-1	Introduction and Summary	3
N1-2	Key Features of the Disposal System	4
N1-3	Approach for Re-Evaluation of the 300-Year Performance Demonstration	4
N1-4	Methodology and Key Changes for Re-Evaluation of the 300-Year Performance Demonstration	5
N1-5	Discussion of the Results of the 300-Year Performance Demonstration N1-5.1 Average Pressure N1-5.2 Average Gas Generation Rate N1-5.3 Average Cumulative Brine Inflow N1-5.4 Average Porosity N1-5.5 Average Brine Saturation	7 7 8 8
N1-6	Conclusion	9
N1-7	References	10

LIST OF FIGURES

Title

Figure N1-1	Predicted Average Pressure in Southernmost Waste Panel for the PABC-2004
-	and for the CRA-2014 PA
Figure N1-2	Predicted Average Cumulative Moles of Gas Generated in the Southernmost
-	Waste Panel for the PABC-2004 and CRA-2014 PA

Figure N1-3 Predicted Average Cumulative Brine Inflow into the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA

Figure N1-4 Predicted Average Porosity in the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA

Figure N1-5 Predicted Average Brine Saturation in the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA

1		ACRONYMS, ABBREVIATIONS, AND UNITS
2	CRA-2014 PA	Performance Assessment for the 2014 Compliance Recertification Application
3	DOE	Department of Energy
4	EPA	Environmental Protection Agency
5 6 7	MgO MPa m³	magnesium oxide Megapascal cubic meter(s)
8	NMED	New Mexico Environment Department
9 10 11 12 13 14	PA PABC PABC-2004 PCS psi	performance assessment Performance Assessment Baseline Calculation Performance Assessment Baseline Calculation prepared for the 2004 Compliance Recertification Application panel closure system pounds per square inch
15 16	ROM ROMPCS	run-of-mine run-of-mine panel closure system
17	SDI	Salt Disposal Investigations
18	TRU	transuranic
19	VOCs	volatile organic compounds
20	WIPP	Waste Isolation Pilot Plant
21		

ADDENDUM N1

2 300-YEAR PERFORMANCE DEMONSTRATION RE-EVALUATION

3 N1-1 Introduction and Summary

1

Information on potential pathways of exposure of humans or environmental receptors to 4 hazardous waste or hazardous waste constituents (exposure assessment) is a specific part B 5 permit application requirement for miscellaneous units pursuant to 20.4.1.900 New Mexico 6 Administrative Code (NMAC) (incorporating Title 40 of the Code of Federal Regulations (CFR) 7 §270.23(c)). In order to meet this information requirement, the exposure assessment was 8 submitted in two parts in the original Waste Isolation Pilot Plant (WIPP) Resource Conservation 9 and Recovery Act Part B Permit Application submitted to the New Mexico Environment 10 Department (NMED) in 1997 (DOE 1997), referred to herein as the original application. Chapter 11 D, Section D-9b, Environmental Performance Standards for the Miscellaneous Unit, contained 12 the initial exposure assessment which consisted of two time periods: Disposal Phase and Post-13 Closure Phase. 14

15 The exposure assessment for the Disposal Phase focused on the emission of volatile organic

compounds (**VOCs**) and was documented in Appendix D9 of the original application. Exposure

assessments for the Disposal Phase are ongoing as a result of several VOC monitoring

18 programs required by Permit Part 4. The VOC monitoring information is discussed in

19 Attachment N of this Renewal Application.

The initial exposure assessment for the Post-Closure Phase was included in Chapter I, Section 20 I-1e(3), Performance of the Closed Facility, of the original application. This exposure 21 assessment focused on possible pathways for exposure during the 30-year Post-Closure Phase 22 by evaluating repository performance over an initial 300-year time period. This initial 300-year 23 performance demonstration was based on performance assessment (PA) modelling performed 24 for a no-migration variance petition submitted to the U.S. Environmental Protection Agency 25 (EPA). The initial evaluation in the original application reached the conclusion that releases of 26 hazardous waste or hazardous waste constituents from the repository would be non-existent, 27 and, therefore, there was no threat of exposure to human or environmental receptors during the 28 Post-Closure Phase. 29

The 300-year performance demonstration was updated in the 2009 Permit Renewal Application 30 (DOE 2009, Addendum N1). The performance demonstration re-evaluation in the 2009 Permit 31 Renewal Application was based on the models and parameters in Performance Assessment 32 Baseline Calculation (PABC) (Leigh et al. 2005) prepared for the 2004 Compliance 33 Recertification Application (PABC-2004). The PABC-2004 was the most recently approved PA 34 baseline when the Permittees prepared the 2009 Permit Renewal Application. At that time, it 35 represented the Permittees' best understanding of the processes and uncertainties that could 36 affect the movement of hazardous waste or hazardous constituents from the WIPP facility. The 37 updated 300-year performance demonstration reached the same conclusion as the initial 38 performance demonstration, namely, that releases of hazardous waste or hazardous waste 39 constituents from the repository would be non-existent and, therefore, there was no threat of 40 exposure to human or environmental receptors during the Post-Closure Phase. 41

A re-evaluation of the 300-year performance demonstration is included in this 2020 Permit

- 2 Renewal Application because the PA baseline has changed since 2004. This re-evaluation is
- 3 based on the models and parameters in the PA for the 2014 Compliance Recertification
- 4 Application (**CRA-2014 PA**) (DOE 2014, Appendix PA-2014). The CRA-2014 PA is the most
- 5 recently approved baseline for U.S. Department of Energy (**DOE**) compliance with the
- 6 applicable long-term radioactive waste compliance standards (found in 40 CFR 191, Subparts B
- 7 and C) and is, therefore, the basis for this performance demonstration re-evaluation.
- 8 This re-evaluation of the 300-year performance demonstration reaches the same conclusion as
- 9 the previous two performance demonstrations that releases of hazardous waste or hazardous
- waste constituents from the miscellaneous unit would be non-existent and, therefore, there is no
- threat of exposure to human or environmental receptors during the Post-Closure Phase.
- 12 N1-2 Key Features of the Disposal System

This 300-year performance demonstration confirms that there will be no migration of hazardous
 waste or hazardous constituents into the Salado Formation (Salado) surrounding the WIPP
 repository because of the following general features of the repository system:

- **First Feature** the transuranic (**TRU**) mixed waste consists primarily of solids with small residual quantities of liquid when it is emplaced in the repository;
- Second Feature the WIPP facility is located in a bedded salt (halite) formation. This
 formation has very low permeability that restricts brine inflows from the intact halite
 formation toward the WIPP repository; and
- Third Feature gas pressure in the disposal rooms remains low relative to the pore pressure in the salt formation for the first 300 years after final facility closure of the repository. Since water flows from high-pressure regions into low-pressure regions, it follows that brine flows inward toward the facility for as long as the pressure gradient is inward, which includes the first 300 years after final facility closure.

In order for releases of hazardous waste or hazardous constituents to occur via brine. brine 26 27 must first flow into the repository, form a leachate that includes constituents from the TRU mixed waste, and then flow outward from the repository. Although pore pressure can be high in the 28 surrounding Salado relative to the excavation pressure, the amount of brine flowing inward from 29 the formation is very small because of the low permeability of the intact halite. This limits the 30 formation of leachate. If leachate were to form, it cannot flow outward from the repository 31 because the pressure in the facility is less than the pressure in the surrounding rock for the first 32 300 years after final facility closure. This logic is based on general features of the repository 33 system; therefore, the results from the various performance demonstrations are expected to be 34 in agreement, even though the PA baseline has changed since the initial exposure assessment. 35 These features are confirmed by the computational results for the re-evaluation of the 300-year 36 performance demonstration, as described subsequently. 37

- 38 N1-3 Approach for Re-Evaluation of the 300-Year Performance Demonstration
- The CRA-2014 PA is based on the latest conceptual models in the PA baseline, which includes
- ⁴⁰ updates to the PABC-2004. The CRA-2014 PA incorporated some input parameters that were
- revised from those used for previous performance demonstrations, as explained below.

Typical input parameters define the mechanical properties of the TRU mixed waste, the 1 hydrologic properties of geologic materials surrounding the repository, and the chemical and 2 radiological properties of TRU mixed waste, to name a few of the important properties and 3 processes in the repository. The input parameters can have constant values or can be defined 4 by distributions of values that represent their uncertainty. For example, the input parameters for 5 the biodegradation rate, inundated iron corrosion rate, anhydrite permeability, and initial halite 6 porosity are defined as distributions in order to represent their uncertainty in the CRA-2014 PA. 7 This uncertainty is maintained in the re-evaluated performance demonstration because the 8 CRA-2014 PA samples these uncertain parameter distributions. This approach differs from the 9 original performance demonstration, which was calculated using constant values of the input 10 parameters. These constant values were generally based on the median values for parameters 11 with uncertainty distributions (DOE 1997, Chapter D, Tables D-2 through D-5). The CRA-2014 12 PA is a robust basis for the re-evaluated performance demonstration because the mean output 13 values are based on the results from a PA calculation that incorporates the full variability of 14 uncertain input parameters for the PA. 15

As will be seen in the following discussion, there are differences between the results from the 16 300-year performance demonstration for the PABC-2004 versus this 300-year performance 17 demonstration re-evaluation (i.e., CRA-2014 PA). For example, the mean or average pressure 18 in the repository for the first 300 years after final facility closure is less than 1 Megapascal (MPa) 19 (145 pounds per square inch (psi)) for the CRA-2014 PA and approximately 3 MPa (435 psi) for 20 the PABC-2004 (see Figure N1-1), a factor of three less. This reduction in repository pressure 21 confirms the conclusion from the previous performance demonstrations that there are no 22 releases of hazardous waste or hazardous waste constituents from the miscellaneous unit 23 during the 300-year period after final facility closure because the pressure difference between 24 the lithostatic pressure, which is about 15 MPa (2,200 psi) (DOE 2004, Chapter 2, Section 25 2.2.1.3), and the repository pressure of approximately 1MPa drives fluid flows inward. 26

N1-4 Methodology and Key Changes for Re-Evaluation of the 300-Year Performance Demonstration

The 300-year performance demonstration is used to determine if gas or brine migrates away 29 from the repository after final facility closure by analyzing the potential for repository gas 30 pressure or brine pressure to exceed that needed for fluids to migrate away from the repository 31 and into the surrounding host rock. This is a reasonable approach because hazardous waste 32 constituents can only migrate away from the miscellaneous unit in gas that is generated by 33 degradation of the TRU mixed waste or in brine that first migrates into the repository or in water 34 that is contained in the waste. More specifically, brine or gas can migrate away from the 35 miscellaneous unit only if the repository is sustained at a pressure greater than the lithostatic 36 pressure in the Salado surrounding the repository, which is about 15 MPa (2,200 psi) (DOE 37 2004, Chapter 2, Section 2.2.1.3). 38

The results from the PABC-2004 and the CRA-2014 PA are presented in Figures N1-1 through 39 N1-5 for the average pressure, average gas generation, average cumulative brine inflow into a 40 panel, average porosity, and average repository brine saturation in the southernmost waste 41 panel. The values in Figures N1-1 through N1-5 are averaged in two ways: (1) over the variation 42 caused by uncertainty in the PA parameters, and (2) over the spatial distribution of conditions in 43 the individual BRAGFLO cells in the southernmost waste panel (DOE 2014, Appendix PA-2014, 44 Figure PA-12). The southernmost waste panel is appropriate for this analysis because the one-45 degree down-dip in the Salado causes brine to flow from north to south, increasing the brine 46

1 volume in the southernmost waste panel. Additional brine in the southernmost waste panel

increases the potential for gas generation and the resulting gas pressure because microbial 2

degradation requires the presence of water and because the anoxic corrosion rate for iron-3

based alloys is greater under inundated conditions. 4

11

Since the 300-year performance demonstration for the 2009 Renewal Application, there have 5 6 been a number of changes to the repository design and to the input parameters for the PA models (U.S. DOE 2014, Appendix PA-2014, Section PA-1.1). Some of these changes resulted 7 in changes in the predicted conditions in the southernmost waste panel. The following changes 8 for the CRA-2014 PA have the potential for impacts on the conditions in the southernmost waste 9 panel: 10

Replacement of Option D panel closure with the run-of-mine panel closure system • (ROMPCS) 12

The Option D panel closure system (PCS), required by Condition 1 of the Final 13 Certification Rulemaking for 40 CFR Part 194 (U.S. EPA 1998), has been replaced with 14 the ROMPCS. The Option D PCS consisted of a concrete-block explosion isolation wall, 15 an open drift section, and a concrete monolith (Camphouse, 2013, Figure 2-1). The 16 ROMPCS consists of 100-feet of run-of-mine (ROM) salt with barriers at each end 17 (Camphouse 2013, Figure 2-2). This change is significant because the ROMPCS does 18 not reach its final porosity until 300 years after final facility closure, which allows gas to 19 flow from the southernmost waste panel into other open spaces in the repository. 20

Inclusion of Additional Mined Volume in the Experimental Region 21

The DOE proposed additional excavations in the WIPP repository experimental area to 22 support the Salt Disposal Investigations (SDI) project. The additional volume from these 23 excavations increases the volume of the experimental region from 87,675 cubic meters 24 (m³) to 148,010 m³, or a change of 60,335 m³ (Camphouse 2013, Section 2.1.2). This 25 change is significant because the additional volume of the experimental region can 26 reduce the gas pressure in the southernmost waste panel, particularly during the first 27 300 years after final facility closure. 28

Refinement to the Inundated Corrosion Rate of Steel 29

Anoxic corrosion of iron-based materials in TRU mixed waste and in TRU mixed waste 30 containers results in the formation of hydrogen gas. The brine-inundated steel corrosion 31 rate in the absence of microbially-produced carbon dioxide was updated in the CRA-32 2014 PA, based on experimental data from Roselle (2013). The new data resulted in a 33 reduction of the mean steel corrosion rate in the absence of carbon dioxide by a factor of 34 2.6 (Camphouse 2013, Tables 2-4 and 2-5). This change is significant because less 35 corrosion means there will be less production of hydrogen gas and less consumption of 36 brine by anoxic corrosion. 37

Refinement to Repository Water Balance 38 ٠

The saturation, pressure, and flow in and out of the repository are potentially influenced 39 by the reaction of materials emplaced in the repository, such as magnesium oxide 40 (MgO), with the repository environment. The chemical reactions for the repository water 41 balance were refined for the CRA-2014 PA in order to include the major gas and brine 42

- producing reactions in the existing conceptual model (U.S. DOE 2014, Appendix PA,
 Section PA-4.2.5).
- 3 <u>N1-5</u> Discussion of the Results of the 300-Year Performance Demonstration

Overlays of output from the PABC-2004 and the CRA-2014 PA are presented in Figures N1-1 through N1-5 for pressure, cumulative gas generation, cumulative brine inflow, porosity, and brine saturation in the southernmost waste panel. The data in Figures N1-1 through N1-5 are based on the average or mean response of the undisturbed waste panel (i.e., a waste panel without an intrusion borehole) in the 100 realizations for Replicate 1 from the PABC-2004 and from the CRA-2014 PA.

10 N1-5.1 Average Pressure

Figure N1-1 indicates that the predicted average pressure in the southernmost waste panel increases with time. The increase in pressure is caused by gas generation from microbial degradation, by gas generation from anoxic corrosion of iron-based alloys, and by creep closure reducing the free volume for gas (shown in Figure N1-4). The pressure after 300 years based on CRA-2014 PA is about 1 MPa (145 psi), while the pressure after 300 years based on PABC-2004 is about 3 MPa (435 psi).

The predicted pressure for this performance demonstration re-evaluation at 300 years, 1 MPa, is about seven percent of the 15 MPa lithostatic stress in the Salado. This result confirms the Third Feature listed in Section N1-2: gas pressure in the disposal rooms remains low relative to the pore pressure in the salt formation for the first 300 years after final facility closure. In this condition, there will be no flow of contaminated brine or gas from the miscellaneous unit during the first 300 years after final facility closure because the pressure differences drive fluid flows inward.

The changes in the CRA-2014 PA result in a reduction in average pressure relative to the 24 PABC-2004; this reduction is caused by several factors (U.S. DOE 2014, Appendix PA, Section 25 PA-7.1). The increased mined volume in the repository experimental area contributes somewhat 26 to this reduction, but it is primarily due to the reduced rate of gas generation. The reduced iron 27 corrosion rate results in slower gas production due to anoxic corrosion (on average). The 28 addition of MgO chemistry to the revised water balance implementation also reduces the 29 amount of free water available for gas production by iron corrosion and by microbial degradation 30 of cellulose, plastic, or rubber materials. Finally, the increased permeability of the ROMPCS for 31 years 0 to 300 relative to the Option D PCS allows for gas to migrate into the operational and 32 experimental regions at early times, thereby reducing pressure in the waste panel (Camphouse 33 2013, Section 6.1.1). 34

35 N1-5.2 Average Gas Generation Rate

The reduction in the total gas generation rate is confirmed by the comparison in Figure N1-2, which demonstrates that gas generation is more than eight times greater for the PABC-2004 than for the CRA-2014 PA. As shown in Figure N1-2, 7.5×10⁶ cumulative moles of gas are predicted to be generated (on average) after 300 years by PABC-2004, while approximately 8.9×10⁵ cumulative moles of gas are generated (on average) after 300 years for the CRA-2014 PA. This change is largely due to the revised inundated iron corrosion rate (Camphouse 2013, Section 6.1.1).

1 <u>N1-5.3 Average Cumulative Brine Inflow</u>

- 2 The trend toward pressure reduction in the CRA-2014 PA (see Figure N1-1) yields a
- 3 corresponding increase (on average) in cumulative pressure-driven brine inflow into the
- 4 southernmost waste panel, as shown in Figure N1-3. The replacement of the Option D PCS with
- the ROMPCS also results in increased brine inflows into the southernmost waste panel because
- 6 of the higher permeability for the ROMPCS (relative to the Option D PCS) from 0 to 300 years
- 7 after final facility closure. This result confirms the Second Feature listed in Section N1-2: low
- 8 permeability of the host rock restricts brine inflows.
- Outward flow of brine from the southernmost waste panel is calculated to be zero for all
 realizations of the CRA-2014 PA for the first 300 years after final facility closure, and no plot is
 shown. This result confirms the Third Feature listed in Section N1-2: gas pressure in the
 disposal rooms remains low relative to the pore pressure in the salt formation for the first 300
 years after final facility closure.
- 14 N1-5.4 Average Porosity
- Figure N1-4 demonstrates that the average porosity of the southernmost waste panel decreases quickly in the first 150 years after final facility closure. This porosity is the average value within
- the panel, including the waste it contains. The waste-filled panel initially has approximately 18%
- solid material and 82% free space by volume. This free space, or void volume, decreases
- rapidly as the waste is compressed by the inward movement of the rock walls due to creep of
- halite. The exact timing of the reduction in void volume is a result of the complex interaction
 between creep closure, gas pressure, and perhaps brine inflow.
- Figure N1-4 shows that the waste porosity curves are very similar for the PABC-2004 and the 22 CRA-2014 PA. The waste porosity for the CRA-2014 PA is expected to be less than the waste 23 porosity for the PABC-2004 because the gas pressure retarding room closure is less for the 24 CRA-2014 PA than for the PABC-2004. However, this is a relatively minor effect because the 25 maximum pressure in the waste panel for either calculation is 3 MPa, which is significantly less 26 than the 15 MPa lithostatic stress in the host rock. In other words, neither 1 MPa nor 3 MPa 27 provides a significant retarding force relative to the 15 MPa in the host rock. As expected, the 28 waste porosity (on average) for the CRA-2014 PA is slightly less than for the PABC-2004. 29
- 30 N1-5.5 Average Brine Saturation
- Brine saturation is the fraction of the void volume that is filled with brine. In other words, brine saturation is equal to brine volume in the waste panel divided by the total void volume in the waste panel. Brine saturation varies between 0 for a dry waste panel to 1 for a waste panel that is completely saturated with brine.
- Figure N1-5 shows that the brine saturation in the waste at time zero is assumed to be 0.015 (1.5 percent), which is as stated in the First Feature in Section N1-2: the TRU mixed waste consists primarily of solids with small amounts of residual liquids when it is emplaced in the repository. Figure N1-5 also demonstrates that brine saturation in the waste panel increases slowly in both the PABC-2004 and the CRA-2014 PA to maxima of 0.16 and 0.17, respectively, at 300 years after final facility closure. The southernmost panel remains relatively dry because the low permeability of the Salado restricts the inward, pressure-driven flow of brine from the

halite formation to the repository, as stated in the Second Feature listed in Section N1-2: low

2 permeability of the host rock restricts brine inflows.

Figure N1-3 shows that the brine inflow to the waste panel for the CRA-2014 PA is about twice 3 as great as the brine inflow for the PABC-2004. Figure N1-4 shows that the porosity and hence 4 the free volume in the waste panel are almost equal for the CRA-2014 PA and PABC-2004. 5 Since the CRA-2014 PA has greater brine inflow to the same free volume as the PABC-2004, 6 the CRA-2014 PA should have greater brine saturation, on the order of a factor of two more, 7 than the waste panel in the PABC-2004. However, Figure N1-2 shows that the brine saturation 8 in the waste panel is essentially equal in the CRA-2014 PA and PABC-2004 during the first 300 9 years after final facility closure. It is possible that the "extra" brine inflow for the CRA-2014 PA 10 remains within the lower disturbed rock zone, below the waste panel, and does not immediately 11 increase the brine saturation in the waste panel for the CRA-2014 PA. 12

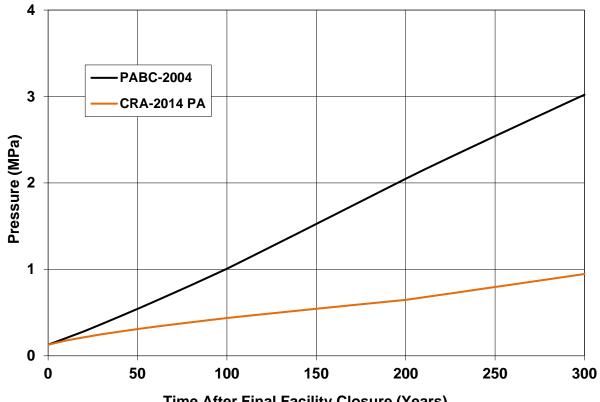
13 N1-6 Conclusion

The original Part B Permit Application for the WIPP facility (DOE 1997) provided extensive 14 discussion of waste management practices and demonstrated that, under normal operating 15 conditions, there was no potential for release of hazardous waste from surface operations. 16 Likewise, normal operations for emplacing waste in the underground repository minimized the 17 potential for release over any pathway other than air emissions during the Disposal Phase. 18 Regarding the Post-Closure Phase, the results from this 300-year performance demonstration 19 confirm that limited brine volume flows inward (because of the low permeability in the salt) and 20 brine doesn't flow outward (because of low gas pressure in the facility relative to the host rock), 21 confirming the three Features of the repository system. The results from the CRA-2014 PA 22 confirm the conclusions in the initial 300-year performance demonstration that there is no 23 outward migration of hazardous waste or hazardous waste constituents along surface water, 24 soil, groundwater, or air/gas pathways from the miscellaneous unit during the first 300 years 25 after final facility closure. Consequently, releases of hazardous waste or hazardous waste 26 constituents from the repository would be non-existent and, therefore, there is no threat of 27 exposure to human or environmental receptors during the Post-Closure Phase. 28

N1-7 References 1

- Camphouse, R.C. 2013. Analysis Package for Salado Flow Modeling Done in the 2014 2
- Compliance Recertification Application Performance Assessment (CRA-2014 PA). ERMS 3
- 559980. Carlsbad, NM: Sandia National Laboratories. 4
- Leigh, C. D., J. F. Kanney, L. H. Brush, J. W. Garner, G. R. Kirkes, T. Lowry, M. B. Nemer, J. S. 5
- Stein, E. D. Vugrin, S. Wagner, and T. B. Kirchner. 2005. 2004 Compliance Recertification 6
- Application Performance Assessment Baseline Calculation, (Revision 0). ERMS 541521. 7
- Carlsbad, NM: Sandia National Laboratories. 8
- Roselle, G.T. 2013. Determination of Corrosion Rates from Iron/Lead Corrosion Experiments to 9 be used for Gas Generation Calculations. ERMS 559077. Carlsbad, NM: Sandia National 10
- Laboratories. 11
- U.S. Department of Energy (DOE). 1997. Waste Isolation Pilot Plant Resource Conservation 12
- and Recovery Act Part B Application, DOE/WIPP 91-005, Revision 6.3. Carlsbad, NM: U.S. 13
- Department of Energy Waste Isolation Pilot Plant, Carlsbad Area Field Office. 14
- U.S. Department of Energy (DOE). 2004. Title 40 CFR Part 191: Compliance Recertification 15 Application for the Waste Isolation Pilot Plant (March). 10 vols. DOE/WIPP 2004-3231. 16
- Carlsbad, NM: U.S. Department of Energy, Carlsbad Field Office. 17
- U.S. Department of Energy (DOE). 2009. Waste Isolation Pilot Plant Ten Year Resource 18 Conservation and Recovery Act Part B Permit Reapplication, Carlsbad, NM: U.S. Department of 19
- Energy Waste Isolation Pilot Plant, Carlsbad Area Field Office. 20
- U.S. Department of Energy (DOE). 2014. Title 40 CFR Part 191: Subparts B and C Compliance 21 Recertification Application for the Waste Isolation Pilot Plant, DOE/WIPP 14-3503. Carlsbad, 22
- NM: U.S. Department of Energy, Carlsbad Field Office. 23
- 24 U.S. Environmental Protection Agency (EPA). 1998. 40 CFR Part 194: Criteria for the
- Certification and Recertification of the Waste Isolation Pilot Plant's Compliance with the 25
- Disposal Regulations: Certification Decision; Final Rule, Federal Register, vol. 63 (May 18, 17 26
- 27 1998): 27353–406.

FIGURES



Time After Final Facility Closure (Years)

Figure N1-1 Predicted Average Pressure in Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA

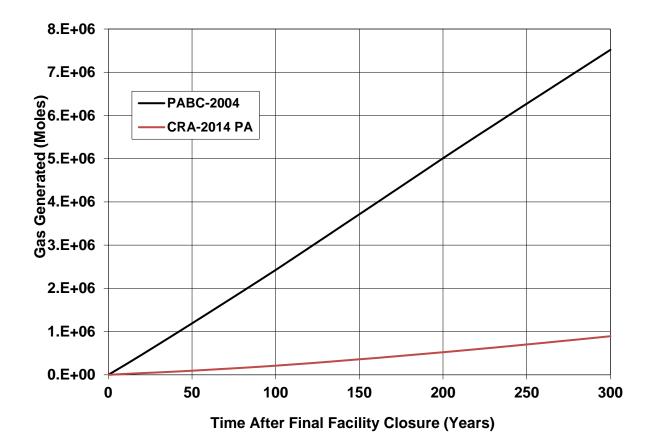


Figure N1-2 Predicted Average Cumulative Moles of Gas Generated in the Southernmost Waste Panel for the PABC-2004 and CRA-2014 PA

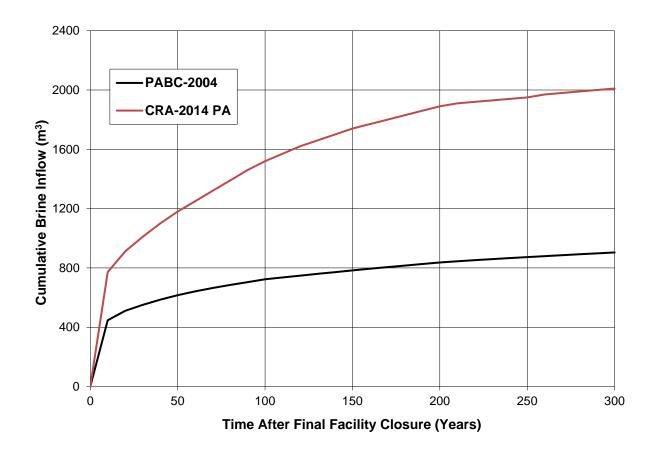


Figure N1-3 Predicted Average Cumulative Brine Inflow into the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA

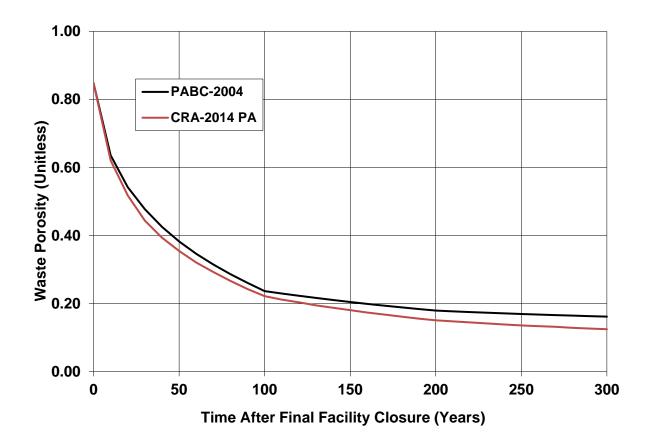


Figure N1-4 Predicted Average Porosity in the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA

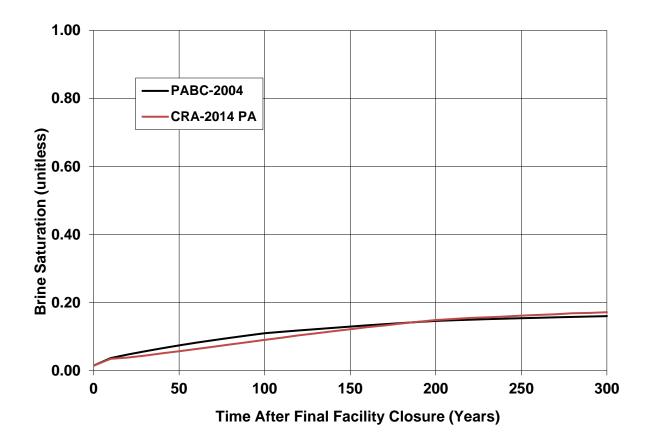


Figure N1-5 Predicted Average Brine Saturation in the Southernmost Waste Panel for the PABC-2004 and for the CRA-2014 PA

ATTACHMENT O

WIPP MINE VENTILATION RATE MONITORING PLAN

ATTACHMENT O

WIPP MINE VENTILATION RATE MONITORING PLAN

TABLE OF CONTENTS

Definitions	3
Objective	3
 Design and Procedures O-3a Test and Balance	4 5 6
Equipment Calibration and Maintenance	7
 Reporting and Recordkeeping O-5a Reporting O-5b Recordkeeping O-5c Standard Operating Procedure Applicable to Abnormal Operating Conditions for Active Room Ventilation Flow Rate 	7 8
Quality Assurance	9
References	9
	Objective Design and Procedures. O-3a Test and Balance O-3a(1) Test and Balance Process. O-3a(2) Test and Balance Schedule. O-3b Active Room Minimum Airflow. O-3b(1) Verification of Active Room Minimum Airflow O-3b(2) Measurement and Calculation of the Active Disposal Room Airflow. C-3b(2) Measurement and Calculation of the Active Disposal Room Airflow. Equipment Calibration and Maintenance Reporting and Recordkeeping. O-5a Reporting. O-5b Recordkeeping Procedure Applicable to Abnormal Operating Conditions for Active Room Ventilation Flow Rate Quality Assurance Quality Assurance

1		List of Tables	
2	Table	Title	
3	<u>Table</u> O-1	Mine Ventilation Rate Testing Equipment	

ATTACHMENT O

WIPP MINE VENTILATION RATE MONITORING PLAN

3 O-1 Definitions

4 Compliance with the mine ventilation requirements set forth in Permit Part 4 and Permit

5 Attachment A2 requires the use and definition of the following terms:

Actual cubic feet per minute (acfm): The volume of air passing a fixed point in an excavation,
 normally determined as the product of the cross section of the excavation and the mean velocity
 of the air.

Standard cubic feet per minute (scfm): The actual cubic feet per minute passing a fixed point adjusted to standard conditions. In the Imperial measurement system, the standard condition for pressure is 14.7 pounds per square inch (psi) (sea level) and the standard condition for temperature is 492 degrees Rankine (freezing point of water or 32 degrees Fahrenheit). The greatest difference between acfm and scfm occurs in the summer when the pressure at the repository horizon is about 14.2 psi and the temperature is about 560 degrees Rankine (100 degrees Fahrenheit). Then

16

1 scfm x (560/492) x (14.7/14.2) = 1.2 acfm

A reasonably conservative conversion factor, therefore, is 1.2. Using this factor, 35,000 scfm is
 very nearly 35,000 x 1.2 or 42,000 acfm.

Restricted Access: If the required ventilation rate in an active <u>disposal</u> room when waste disposal is taking place cannot be achieved or cannot be supported due to operational needs, access is restricted by the use of barriers, signs and postings, or individuals stationed at the entrance to the active disposal room when ventilation rates are below 35,000 scfm unless measures as described in Section O-3b(1) are implemented. Note: As provided in Section O-3b(2) entry to restricted access active rooms for the purpose of establishing normal ventilation is allowed.

26 **Shift:** Those work shifts when there is normal access to the Waste Isolation Pilot Plant (**WIPP**) 27 underground.

28 **Worker:** Anyone who has normal <u>unescorted</u> access to the WIPP underground.

29 <u>O-2 Objective</u>

The objective of this plan is to describe how the ventilation requirements in the Permit will be met. This plan achieves this objective and documents the process by which the Permittees

- demonstrate compliance with the ventilation requirements by:
- Maintaining a minimum of 35,000 scfm of air through the active rooms when waste disposal is taking place and when workers are present in the rooms

If an active room ventilation rate of 35,000 scfm cannot be met, actions as described in
 Section O-3b(1) shall be taken during waste disposal operations when workers are
 present.

This plan contains the following elements: Objective; Design and Procedures; Equipment
 Calibration and Maintenance; Reporting and Record Keeping; Quality Assurance.

6 O-3 Design and Procedures

This section describes the three basic processes that make up the mine ventilation rate
 monitoring plan:

- Test and Balance, a periodic re-verification of the satisfactory performance of the entire underground ventilation system and associated components
 - Monitoring of active <u>disposal</u> room(s) to ensure a minimum flow of 35,000 scfm whenever waste disposal is taking place and workers are present in the room
- If an active <u>disposal</u> room ventilation rate of 35,000 scfm cannot be met, actions as
 described in Section O-3b(1) shall be taken during waste disposal operations when
 workers are present.
- 16 O-3a Test and Balance

11

12

17 O-3a(1) Test and Balance Process

The WIPP <u>underground</u> ventilation system and the underground ventilation modes of operation 18 are described in Permit Attachment A2, Section A2-2a(3). The Permittees shall verify 19 underground ventilation system performance by conducting a periodic Test and Balance. The 20 Test and Balance is a comprehensive series of measurements and adjustments designed to 21 ensure that the system is operating within acceptable design parameters. The Test and Balance 22 is an appropriate method of verifying system flow because it provides consistent results based 23 on good engineering practices. The testing of underground ventilation systems is described in 24 McPherson, 20091993. Once completed, the Test and Balance data become the baseline for 25 underground ventilation system operation until the next Test and Balance is performed. 26

The "Test" portion of the process shall involve measuring the pressure drop and air quantity of every underground entry excluding alcoves or other dead end drifts. In addition, the tests shall verify resistance curves for each of the main regulators, measure shaft resistance, and measure main fan pressure and quantity. This is done at the highest achievable airflow to facilitate accurate measurements. From these measurements the frictional resistance of the system is determined.

Pressure shall be measured using the gage and tube method, which measures the pressure drop between two points using a calibrated pressure recording device and pitot tubes. Pressure drops across the shafts shall be measured by either calibrated barometers at the top and bottom of shafts or the gage and tube method. Airflow shall be measured using a calibrated vane-anemometer to take a full entry traverse between system junctions. Fan pressure shall be measured using a calibrated pressure recording device and pitot tube to determine both static and velocity pressure components. 1 Multiple measurements shall be taken at each field location to ensure accurate results.

2 Consecutive field values must fall within ±5% to be acceptable. These data shall be verified

3 during the testing process by checking that:

• the sum of airflows entering and leaving a junction is equal to zero; and,

• the sum of pressure drops around any closed loop is equal to zero.

6 Once the measurements are taken, data shall be used to calculate the resistance of every 7 underground drift, as well as shafts and regulators using Atkinson's Square Law

8 P=R x Q²

where the pressure drop of an entry (P) is equal to a resistance (R) times the square of the
 quantity of air flowing (Q) through the circuit.

The "Balance" portion of the process shall involve adjusting the settings of the system fans and regulators to achieve the desired airflow distribution in all parts of the facility for each mode of operation. The system baseline settings for the current Balance shall be established from the previous Test and Balance. Adjustments shall then be made to account for changes in system resistance due to excavation, convergence due to salt creep, approved system modifications, or operational changes.

The Permittees shall use a <u>commercially available</u> <u>an appropriate</u> ventilation simulator to process Test and Balance field data. The simulator uses the Hardy-Cross Iteration Method (McPherson, <u>2009</u>1993) to reduce field data into a balanced ventilation network, including the appropriate regulator settings necessary to achieve proper airflow distribution for the various operating modes. Once balanced, the same simulator shall be used to evaluate changes such as future repository development and potential system modification before they are implemented.

The Test and Balance process culminates in a final report which is retained on site. Following 24 receipt of the Test and Balance Report, the Permittees shall revise the WIPP surface and 25 underground ventilation system procedures to incorporate any required changes to the 26 ventilation system configuration. The Test and Balance data shall be used to adjust the 27 operating range of fan controls, waste tower pressure, auxiliary air intake tunnel regulator 28 settings, underground regulator settings, and door configurations. The model data and 29 procedure changes shall be used to establish normal configuration settings to achieve the 30 desired airflow in the underground. These settings shall then be modified by operations 31 personnel throughout the year to compensate for system fluctuations caused by seasonal 32 changes in psychrometric properties, and to meet specific operational needs. This ensures that 33 the facility is operated at the design airflow rate for each ventilation mode. 34

35 <u>O-3a(2)</u> Test and Balance Schedule

The Test and Balance is generally conducted on a 12- to 18-month interval, but in no case shall the interval between consecutive Test and Balance performances exceed 18 months. This interval is sufficient to account for changes in the mine configuration since over this period the ventilated volume changes very little. The quality and maintenance of ventilation control structures (e.g., bulkheads) is excellent, so leakage is small and relatively

- 1 constant.<u>Maintenance of ventilation control structures (e.g., bulkheads) occurs periodically to</u>
- 2 <u>ensure the ventilation structure performs as expected.</u> Historic test and balance results confirm
- 3 that changes between test and balances fall within anticipated values.
- 4 O-3b Active Room Minimum Airflow

5 O-3b(1) Verification of Active Room Minimum Airflow

- 6 Whenever workers are present, the Permittees shall verify the minimum airflow through active
- 7 room(s) when waste disposal is taking place of 35,000 scfm at the start of each shift, any time
- 8 there is an operational mode change, or if there is a change in the ventilation system
- 9 configuration. If an active room ventilation rate of 35,000 scfm cannot be met, measures such
- as those described below shall be taken during waste disposal operations when workers are
- 11 present.
- Measures to allow waste emplacement in an active room when, under abnormal conditions, 12 13 35,000 scfm cannot be achieved will be prescribed in standard operating procedure(s) (SOPs) described in Section O-5c. These measures may include, but are not limited to, the following: 14 the adjustment of the volatile organic compound (VOC) immediately dangerous to life or health 15 (IDLH)-based action levels in the Permit Part 4, Section 4.6.3.2 (these adjustments are directly 16 proportional to the actual flow rate that is less than 35,000 scfm); or the use of personal 17 protective equipment (PPE) as described in Occupational Safety and Health Administration 18 (OSHA) Standard 29 CFRCode of Federal Regulations (CFR) 1910.134. 19
- ²⁰ Implementing measures taken at the WIPP facility regarding the 35,000 scfm ventilation rate
- and associated details (i.e., date, start time, end time, and reason) will be recorded in the
- 22 Central Monitoring Room Operator's (CMRO) Log and reported to the New Mexico Environment
- Department (**NMED**) as required by Section O-5a.

24 O-3b(2) Measurement and Calculation of the Active Disposal Room Airflow

- The Permittees shall measure the airflow rate and use the <u>disposal</u> room cross-sectional area to 25 calculate the volume of air flowing through a disposal room. The measurement of airflow shall 26 use a calibrated anemometer and a moving traverse (McPherson, 20091993). Airflow 27 measurements shall be collected at an appropriate location, chosen by the operator to minimize 28 airflow disturbances, near the entrance of each active disposal room. The excavation 29 dimensions at the measurement location are taken and the cross-sectional area is calculated. 30 The flow rate is the product of the air velocity and the cross-section area. The value shall be 31 entered on a log sheet and compared to the required minimum. The format and content of the 32 log sheet may vary, but will always contain the following data and information as applicable: 33
- o Date
- 35 Time
- Ventilation flow rate reading
- If the required minimum ventilation rate was achieved
- If the room was restricted

- If Section O-3b(1) measures will be implemented (implementing procedure and revision number, if applicable)
- The reason for waste emplacement under 35,000 scfm ventilation rate, if applicable
- Signature
- Working values are in acfm and the conversion to scfm is described in Section_O-1 above.
 Measurements shall be collected, recorded, and verified by qualified operators.

The operator shall compare the recorded acfm value with the minimum acfm value provided at 7 the top of the log sheet. During waste disposal operations, t The airflow shall be re-checked and 8 recorded whenever there is an operational mode change or a change in ventilation system 9 configuration. Once the ventilation rate has been recorded and verified to be at least the 10 required minimum, personnel access to the room is unrestricted in accordance with normal 11 underground operating procedures. If the required ventilation rate cannot be achieved, or 12 cannot be supported due to operational needs, access to the room shall be restricted. Those 13 periods when active disposal room access is restricted shall be documented on the log sheet for 14 that active disposal room. Entry to restricted access active rooms for the purpose of establishing 15 normal ventilation or for emplacing waste under the conditions identified in Section O-3b(1) is 16 allowed. Such entry shall be documented on the log sheet including a reference to the SOP 17 used. 18

- 19 O-4 Equipment Calibration and Maintenance
- The list of equipment used to conduct the Test and Balance and to determine the airflow
 through the active disposal room(s) is provided in Table O-1.
- 22 Equipment used for the periodic Test and Balance, and daily verification of active disposal room
- ²³ flow rate shall be calibrated, as appropriate, in accordance with appropriate WIPP facility
- calibration and data collection procedures. Work performed by subcontractors shall also be
- calibrated to an equivalent standard. Equipment shall be inspected before each use to ensure
- that it is functioning properly and that the equipment calibration is current. Maintenance of
- equipment shall be completed by qualified individuals or by qualified off-site service vendors.
- Equipment used to conduct the Test and Balance, and to determine the airflow through the
 active disposal room(s) are provided in Table O-1.
- 30 O-5 Reporting and Recordkeeping
- 31 O-5a Reporting
- The Permittees shall submit an annual report to NMED presenting the results of the data and
- analysis of the Mine Ventilation Rate Monitoring Plan. In the years that the Test and Balance is
- performed, the Permittees will provide a summary of the results in the annual report.
- 35 The Permittees shall evaluate compliance with the minimum ventilation rate for an active room
- 36 specified in Permit Part 4, Section 4.5.3.2 on a monthly basis. The Permittees shall report to the
- 37 Secretary in the annual report specified in Permit Part 4, Section 4.6.4.2 whenever the
- evaluation of the mine ventilation monitoring program data identifies that the ventilation rate

specified in Permit Part 4, Section 4.5.3.2 has not been achieved. The Permittees will identify

the implementing measures as described in Section O-3b(1) used to allow waste handling

activities to proceed when the 35,000 scfm ventilation rate is not achieved. These implementing

4 measures and associated details (i.e., date, start time, end time, and reason) will be reported to

5 NMED in the annual Mine Ventilation Rate Monitoring Report required by this section.

6 The Permittees shall also notify NMED by e-mail within 15 calendar days of commencement of

7 waste emplacement operations taking place below 35,000 scfm. The notification shall include

8 the date, start time, end time, reason and implementing measure taken, as applicable. If the

9 Permittees have not completed the waste emplacement activity by the time of this notification, a

10 follow-up e-mail shall be provided within 15 calendar days to notify NMED of the end of the

11 waste emplacement activity and other relevant information not previously provided.

12 O-5b Recordkeeping

- 13 The Permittees shall retain the following information in the Operating Record:
- The CMRO Log documenting the ventilation system operating mode.
- Active disposal room log sheet documenting the ventilation flow rate readings and applicable information listed in Section O-3b(2).

These records will be maintained in the facility Operating Record until closure of the WIPPfacility.

19O-5cStandard Operating Procedure Applicable to Abnormal Operating Conditions for20Active Room Ventilation Flow Rate

The abnormal operating conditions procedure provides instructions necessary to evaluate VOC 21 concentrations in an adjacent filled room prior to commencing waste emplacement operations in 22 an active disposal room when workers are present at a reduced active room ventilation flow 23 rate. Abnormal conditions that may prevent 35,000 scfm from being met, may include, but are 24 not limited to, barometric pressure changes, maintenance activities, and equipment 25 malfunctions. VOC data in the adjacent filled room are collected and analyzed in accordance 26 with Permit Part 4, Section 4.6.3. Adjusted VOC action levels are prescribed at a maximum of 27 5,000 scfm increments (e.g., 30,000 scfm, 25,000 scfm, 20,000 scfm, 15,000 scfm, and 10,000 28 scfm) to provide a means of assessment. When the measured flow rates falls between the 29 increment values in the SOP, the lower flow rate is used for determining the adjusted VOC 30 action level. The validated VOC monitoring data are compared to the action levels prescribed in 31 the standard operating procedure and a decision flow path is provided to the Facility Shift 32 Manager, or designee, to determine applicable actions. 33

These actions include, but are not limited to, commencing waste emplacement operations at a 34 reduced active room ventilation flow rate based on the adjusted VOC action levels, commencing 35 waste emplacement operations at a reduced active room ventilation flow rate with the use of 36 PPE as described in OSHA standard 29 CFR 1910.134, or restricting access to the active 37 disposal room until the ventilation flow rate requirements of Permit Part 4, Section 4.5.3.2- are 38 met. As stated in the abnormal operating conditions procedure, implementing measures taken 39 at the WIPP facility are recorded in the CMRO Log and reported to NMED as required by 40 Section O-5a. 41

1 O-6 Quality Assurance

- Quality assurance associated with the Mine Ventilation Rate Monitoring Plan shall comply with the requirements of the WIPP Quality Assurance Program Description (**QAPD**). The Permittees shall verify the qualification of personnel conducting ventilation flow measurements. The instrumentation used for monitoring active disposal rooms shall be calibrated in accordance with the applicable provisions of the WIPP procedures. The ventilation simulation software programs shall be controlled in accordance with the WIPP QAPD and WIPP computer software quality assurance plans.
- Data generated by this plan, as well as records, and procedures to support this plan shall be
 maintained and managed in accordance with the WIPP QAPD. Nonconformance or conditions
 adverse to quality as identified in performance of this plan will be addressed and corrected as
 necessary in accordance with applicable WIPP Quality Assurance procedures.
- 13 O-7 References
- 14 McPherson, Malcolm J. 2009. Subsurface Ventilation Engineering. 2nd. Fresno, California: Mine
- 15 <u>Ventilation Services Inc. McPherson, M. J., 1993</u>. Subsurface Ventilation and Environmental
- 16 *Engineering*, Chapman & Hall, London, First Edition.

	٦	TABLES

	Ventilation Test Performed	
Equipment Used to Conduct Test	Test and Balance	Active Disposal Room(s)
Calibrated Anemometer	Х	Х
Calibrated Differential Pressure Sensor	Х	
Pitot Tubes	Х	
Tubing	Х	
Temperature Sensing Device	Х	
Relative Humidity Sensor	х	
Calibrated Barometers	х	
Electronic Manometer	Х	

Table O-1Mine Ventilation Rate Testing Equipment