Mr. Mark Weidler, Secretary  
New Mexico Environment Department  
Harold Runnels Building, Room 4050  
1190 St. Francis Drive  
P. O. Box 26110  
Santa, New Mexico 87503  

Dear Mr. Weidler:

I am pleased to provide you a copy of the second major revision to the WIPP Disposal Decision Plan (DDP). I am also providing an audit of change from revision one for your convenience.

The significant change driving this revision is my decision to accelerate the submittal of the Compliance Certification Application to EPA by two months. The new planned date is October 1996. This decision was taken after an in-depth review by all program participants of the processes and activities embodied in the completion of the Application. I found that through process improvement and by conducting some activities in parallel we could move up the final submittal date. I am confident that we can achieve this schedule and open this critically important national facility.

As always, I would be pleased to discuss any aspect of this plan with you at your convenience.

Sincerely,

George E. Dials  
Manager

Enclosures
# WIPP Disposal Decision Plan

## Regulatory/Technical Processes

**FY 1994**
- Submit Draft Compliance Certification Package (191) to EPA 3/95
- Submit Revised Resource Conservation & Recovery Act (RCRA) Part B Application to New Mexico Environment Department (NMED) 5/95
- Submit Biennial Environmental Compliance Report 10/94*

**FY 1995**
- Environmental Protection Agency (EPA) Issue 40 CFR 194 2/96+
- Submit Biennial Environmental Compliance Report 10/96*
- Submit No Migration Variance Petition for Disposal to EPA 6/96
- RCRA Permit Issued 6/96*

**FY 1996**
- Issue Biennial Environmental Compliance Report 10/96*
- Submit Compliance Certification Application to EPA 10/96*
- Disposal Phase Supplemental Environmental Impact Statement Record of Decision (ROD) 3/97
- No Migration Determination Issued 6/97
- Final Performance Input for the Compliance Certification Application 6/96
- Final Data Input to Models for 3/96 CCDF 3/96
- Final CCDF Calculations to Compliance Application 6/96
- Comprehensive Disposal Recommendation Submitted to Congress 5/97*

**FY 1997**
- NRC Approval of RH Safety Analysis Report for Packaging 9/96
- Carrying Operational 6/97
- Notify States & Indian Tribes of Intent to Transport 10/97*
- RH Operations are planned to begin in FY2002

**FY 1998**
- EPA Certification 10/97*

## Stakeholders/Oversight

### Experimental Programs & Performance Assessment (PA)
- Sandia National Laboratories (SNL) Documentation to 3/95
- Draft Compliance Package 12/94
- Final Data Input to Models for 3/96 CCDF 3/96
- Final CCDF Calculations to Compliance Application 6/96
- Comprehensive Disposal Recommendation Submitted to Congress 5/97*

### Waste Characterization, Certification, and Inventory
- Performance Based Waste Acceptance Criteria Preliminary Baseline Assumptions 10/94
- Inventory Definition to Final Compliance Package 6/96
- Inventory Definition to Final Compliance Package 6/96
- Issue TRU Waste Management Plan 9/96
- Comprehensive Disposal Recommendation Submitted to Congress 5/97*

### Operations
- Nuclear Regulatory Commission (NRC) Recertifies TRUPACT-II 8/94
- Complete Remote Handled (RH) Strategy 3/95
- Complete RH Study 10/95*
- NRC Approval of RH Safety Analysis Report for Packaging 9/96
- Approved Disposal Operations Safety Analysis Report 3/97
- (180 Day Post EPA Certification Waiting Period)
- Begin CH Disposal Operations 4/98

## Notes

- 1996-1998 milestones are dependent on funding allocation from Program Budget Cycle.
- Contact David Holmes, (505) 234-7314, for information or questions related to this document.
- * All associated compliance LWA requirements
- EPA controlled action.
Revision #2 to Disposal Decision Plan
Audit of change from Revision #1

October 6, 1995

- **Accelerate Disposal Decision** from 1/98 to 10/97
  - Accelerate Begin CH Disposal Operations from 6/98 to 4/98
  - Accelerate Notify States & Indian Tribes of Intent to Transport from 12/97 to 10/97
  - Accelerate EPA Certification from 12/97 to 10/97
  - Accelerate Submit Compliance Certification Application to EPA from 12/96 to 10/96
  - Accelerate Final CCDF Calculations to Compliance Application from 9/96 to 6/96
  - Accelerate Operational Readiness Declaration from 12/97 to 9/97
  - Accelerate Final Performance Input for the 10/96 Compliance Application from 10/96 to 6/96
  - Accelerate Decommissioning & Post Decommissioning Plan from 10/97 to 9/97
  - Accelerate Comprehensive Disposal Recommendation from 12/97 to 5/97
  - Accelerate Inventory Definition to Final Compliance Application from 9/96 to 6/96

Acceleration accommodates the Secretary of Energy's recommendation by reducing two months in completing the Compliance Certification Application, while still allowing for 12 months review and approval for the EPA.

- **SEIS II Record of Decision (ROD)** moved from 9/97 to 3/97

The potential passage of the House Bill H.R. 1663 (Skeen) would result in the acceleration of the decision to operate from January 1998 to March 1997. The SEIS Record of Decision (ROD) would have to be issued by that date. Presently it is scheduled for October 1997. Issuing the ROD earlier requires that the schedule for preparation of the SEIS be accelerated by seven months. A review of the DDP for key documentation needs for preparation of the SEIS indicates that all required input will be available even with the seven month acceleration. Delaying the acceleration of the SEIS until the results of the Skeen Bill are known will not provide the necessary time to complete the activities necessary to achieve the ROD issuance in March 1997, as specified by the Skeen Bill.

- **RCRA Permit Issued** moved from 12/97 to 8/96

The New Mexico Governor has committed to completing the permit in one year.

- **TRU Waste Management Plan** added as a key milestone on 9/96

This plan consists of options and recommendations regarding the national configuration for TRU waste management and disposal at all sites (Waste Inventory Work off Plan), and is key to the system operational planning after disposal operations are initiated. This plan will be a major management tool for National TRU Operations.

- **Approve Disposal Operations Safety Analysis Report** milestone title change

Changed the title from “Complete Disposal Phase Final Safety Analysis Report” to be consistent with the title of the Safety Analysis Report.

- **Waste Characterization, Certification and Inventory.** Title Change

Changed from “National Transuranic Program Office Waste Characterization” to reflect the consolidation of the NTPO into the Office of National TRU Waste Operations and to better define the key activities included on this line.
• **Comprehensive Disposal Recommendations submitted to Congress** added on 5/97

This is a Land Withdraw Act prerequisite for disposal operations as stated in section 7 (b) (5): "the submittal to Congress by the Secretary of comprehensive recommendations for the disposal of all transuranic waste under the control of the Secretary, including a timetable for the disposal of such waste”

• **RH Operations Are Planned to Begin in FY 2002**

Changed from "Post 2000" to be aligned to the current operations assumptions.

• **NRC Approval of RH Safety Analysis Report for Packaging** moved from 1/96 to 9/96.

The 1/96 milestone will not be met due to delays at headquarters.

**Other Changes:**

• Change reference to Compliance Certification Package to Compliance Certification Application to correct terminology.

• Delete FY99 and expand FY94 through FY98 since all key milestones occur prior to FY99.

• Change “Notes” from 1995 to 1996. This reflects the period which is active for decisions in the this revision to the Disposal Decision Plan.

• Fill in Final Models to PA for 9/96 Complementary Cumulative Distribution Function (CCDF) 9/95 to reflect its completion.

• Fill in all stakeholder meetings through FY95 to reflect completion.