
**Title 40 CFR Part 191
Subparts B and C
Compliance Recertification
Application
for the
Waste Isolation Pilot Plant
Structure of the CRA-2009**



**United States Department of Energy
Waste Isolation Pilot Plant**

**Carlsbad Field Office
Carlsbad, New Mexico**

Structure of the CRA-2009

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CRA-2009STRUCT-3

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Acronyms and Abbreviations

CARD	Compliance Application Review Document
CCA	Compliance Certification Application
CRA	Compliance Recertification Application
EPA	U.S. Environmental Protection Agency
WIPP	Waste Isolation Pilot Plant

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Structure of the CRA-2009

The format of the Compliance Recertification Application (CRA)-2009 differs from the two previous applications, the Compliance Certification Application (CCA) and the CRA-2004. The CRA-2009 follows the structure of 40 CFR Part 194 and is organized by sections of Part 194 rather than by the chapter format established in the CCA and continued in the CRA-2004. This format follows the format used in the U.S. Environmental Protection Agency's (EPA's) Compliance Application Review Documents (CARDs) and is intended to facilitate the EPA and stakeholder reviews of the application. This format is expected to allow a more direct evaluation of any changed information with respect to previous applications. Each section includes the following components:

1. **Requirements:** The text of the regulation
2. **Background:** The historical context of how the DOE and the WIPP have complied with the regulation
3. **1998 Certification Decision:** A summary of the CCA and the EPA's evaluation of compliance to the regulation
4. **Changes in the CRA-2004:** An identification and summary of changes from the CCA to the CRA-2004 directly related to the regulation
5. **EPA's Evaluation of Compliance for the 2004 Recertification:** A summary of the EPA's evaluation of the CRA-2004
6. **Changes or New Information Since the 2004 Recertification:** The changes that have resulted from continuing scientific investigations and operations at the Waste Isolation Pilot Plant (WIPP)

The following table contains the listings of the sections and appendices included in this application.

Table STRUCT-1. List of CRA-2009 Sections and Page Counts

CRA-2009 Document	Pg Ct
Executive Summary and Structure	5
194.08 Approval process for sites	7
194.15 Content of CRA	19
194.21 Inspections	8
194.22 Quality assurance	16
194.23 Models and computer codes	32
194.24 Waste characterization	32
194.25 Future state assumptions	7

1 **Table STRUCT-1. List of CRA-2009 Sections and Page Counts (Continued)**

CRA-2009 Document	Pg Ct
194.26 Expert judgment	5
194.27 Peer review	9
194.31 Application of release limits	6
194.32 Scope of PA	22
194.33 Drilling events in PA	23
194.34 Results of PA	13
194.41 Active institutional controls	3
194.42 Monitoring	6
194.43 Passive institutional controls	5
194.44 Engineered barriers	11
194.45 The presence of resources	4
194.46 Removal of waste	3
194.51-52 Exposure pathways	5
194.53 Sources of drinking water	5
194.54 Scope of CA	5
194.55 Results of CA	6
Appendix AUD	39
Appendix DATA	47
Appendix HYDRO	104
Appendix IGP	28
Appendix MASS	104
Appendix MgO	102
Appendix MON	24
Appendix PA	238
Appendix PORSURF	14
Appendix SCR	238
Appendix SOTERM	115
Appendix TFIELD	122
Attachment A—Figures	121
	1548

2

3 There are some cases where there is an appendix containing technical information similar to that
4 covered in a section. In these cases, the section is a summary of the information provided in the
5 appendix.

1 Two appendices (Appendix HYDRO-2009 and Appendix IGP-2009) are new: they have no
 2 corresponding appendices in the CRA-2004. One attachment and two appendices from the
 3 CRA-2004 have no corresponding document in the CRA-2009 (Attachment PAR; Appendix
 4 PEER-2004; and Appendix EPA WASTE). The CRA-2004, Appendix BARRIERS has been
 5 renamed the CRA-2009, Appendix MgO-2009.

6 In response to the new format, several attachments to Appendix PA in the CRA-2004 have been
 7 renamed as appendices. Table STRUCT-2 shows the relationships between CRA-2004
 8 appendices and attachments and CRA-2009 appendices.

9 Figure STRUCT-1 shows all 23 sections and 13 appendices and the relationship of each
 10 appendix to specific sections in the CRA-2009.

11 At the request of the EPA, an electronic version of the CRA-2009 is included in this application
 12 that includes hyperlinks to all references cited in the text.

13 **Table STRUCT-2. CRA-2004 Appendices and Corresponding Appendices in CRA-2009**

CRA-2004 Appendix	CRA-2009 Appendix
Appendix AUD-2004	Appendix AUD-2009
Appendix BARRIERS	Appendix MgO-2009
Appendix DATA	Appendix DATA-2009
—	Appendix HYDRO-2009
—	Appendix IGP-2009 ^a
Appendix MON 2004	Appendix MON-2009
Appendix PA	Appendix PA-2009
Appendix PA, Attachment PAR	Fox 2008 ^b
Appendix PA, Attachment TFIELD	Appendix TFIELD-2009
Appendix PA, Attachment MASS	Appendix MASS-2009
Appendix PA, Attachment PORSURF	Appendix PORSURF-2009
Appendix PA, Attachment SCR	Appendix SCR-2009
Appendix PA, Attachment SOTERM	Appendix SOTERM-2009
Appendix PEER-2004	Section 27 ^c
Appendix QAPD	Appendix QAPD-2009
Appendix TRU WASTE	Section 24 ^d

^a Appendix IGP-2009 is an update of the CRA-2004, Chapter 8.0.

^b The CRA-2009 equivalent of the CRA-2004, Appendix PA, Attachment PAR is a standalone document entitled “Parameter Report for the CRA-2009.”

^c A summary of new peer reviews is contained in Section 27 of the CRA-2009.

^d Most of the CRA-2004, Appendix TRU WASTE is contained in Section 24 of the CRA-2009.

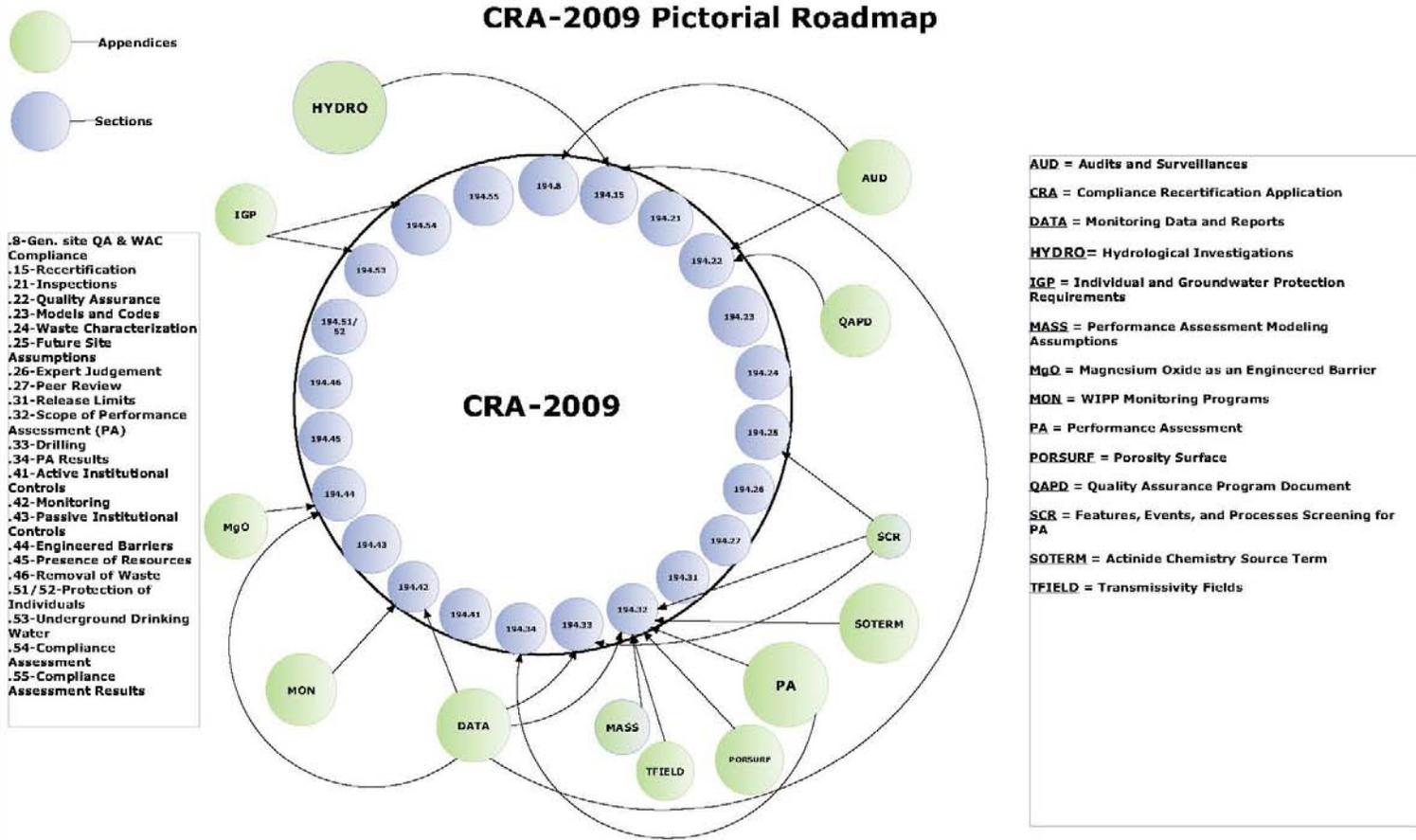


Figure STRUCT-1. CRA-2009 Pictorial Roadmap