UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

April 14, 2021

OFFICE OF
AIR AND
RADIATION

Mr. Reinhard Knerr
Manager
Carlsbad Field Office
Department of Energy
PO Box 2090
Carlsbad, New Mexico 88221

Dear Mr. Knerr:

The Environmental Protection Agency has reviewed the Department of Energy's (DOE) November 2, 2020 planned change request (PCR) to place run-of-mine (ROM) salt in alternate locations for Panels 1 and 2 at the Waste Isolation Pilot Plant (WIPP).

In 2014, EPA modified the special conditions associated with the certification of compliance for the WIPP such that the panel closure system would be conducted in a manner specifically approved by the Agency (79 Federal Register 60750, October 8, 2014). At that time, EPA approved DOE's proposed Run-of-Mine Salt Panel Closure System (ROMPCS). The modified special conditions specifically provided that DOE must inform EPA of any changes to the panel closure design and provide appropriate supporting information (40 CFR Part 194, Appendix A, Condition 1). DOE's current PCR still relies on the ROMPCS, but requests approval of changes involving alternative salt panels closure locations associated with Panels 1 and 2. The Agency finds that the alternate panel design would be comparable to and continues to comply with the EPA-approved ROM panel closure system (PCS) design of having a minimum of 100 feet of salt between ventilation bulkheads that fill the drift from floor to ceiling. Furthermore, the modifications to the ROMPCS for Panels 1 and 2 should not significantly impact calculated releases in the Performance Assessment (PA) and do not require modification of the compliance criteria. For these reasons, EPA approves this PCR.

DOE's qualitative evaluation of this change to any potential releases indicates that there would be little effect on possible repository releases (e.g., there would be a slight decrease in North Rest-of-Repository volume). EPA finds this assessment adequate based on its review of the existing PA from CRA-2019. The Agency will expect to see this update reflected in future PAs to better represent the expected repository conditions. Please update the Agency on emplacement progress and any problems encountered.

If you have any questions, please have your staff contact Tom Peake at Peake.Tom@epa.gov and (202) 343-9765.

Sincerely,

LEE ANN VEAL Digitally signed by LEE ANN VEAL
Date: 2021.04.14 09:26:40 -04'00'

Lee Ann B. Veal
Director
Radiation Protection Division

cc: Mark Bollinger, CBFO
Mike Brown, CBFO
Anderson Ward, CBFO
Justin Marble, DOE HQ
Ricardo Maestas, NMED
Kevin Pierard, NMED
Tom Peake, EPA RPD
Ray Lee, EPA RPD
Ingrid Rosencrantz, EPA RPD
EPA HQ WIPP Team
Charles Starrs, EPA OGC
Jonathan Edwards, EPA ORIA