Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

NOV 02 2020

Ms. Lee Ann B. Veal
Director of Radiation Protection Division
Office of Radiation and Indoor Air
U.S. Environmental Protection Agency
William Jefferson Clinton Building, NW
1301 Constitution Ave NW, Mail Code 6608T
Washington, DC 20004

Subject: Planned Change Request for Alternative Panel Closure Locations for Panels 1 and 2

Dear Ms. Veal:

The purpose of this letter is to provide a planned change request pursuant to 40 Code of Federal Regulations (CFR) 194.4a(3)(i) and request approval from the Environmental Protection Agency (EPA) for the Department of Energy's (DOE's) plan to install the Run of Mine (ROM) salt panel closure system in alternate locations for Panels 1 and 2.

The DOE's primary concern for choosing alternative locations for installing the ROM salt panel closure system is to continue to protect workers from the potential hazards associated with working in and around the entrances to Panels 1 and 2 and in the E-300 drift including but not limited to unstable ground conditions and radiological contamination.

Currently, Panels 1 and 2 access drifts (S-1600, S-1950, S-2180, & S-2520) east of the E-300 drift are prohibited from entry in accordance with criteria in the Mine Safety and Health Administration (MSHA) (30 CFR 57.3200). Scheduled maintenance for portions of Panels 1 and 2 access drifts has not been completed since the 2014 incidents due to higher priority ground control work in other areas of the underground. Attempting to remediate those portions of the underground that are prohibited would come with unacceptable risk to the worker(s). The DOE has identified safe and compliant alternative locations for installing the ROM salt panel closure system for Panels 1 and 2. The alternative closure locations are illustrated in Enclosure 1. Enclosure 2 illustrates the previously proposed general locations for the ROM salt panel closure system depicted in the Planned Change Request (PCR) submitted to the EPA on September 28, 2011 and is included for your convenience.

Within the construct of the current Waste Isolation Pilot Plant (WIPP) Performance Assessment (PA), Panels 1, 2, 7, 8, and 10 are modeled together into the North Rest-of-Repository area (see DOE/WIPP-19-3609, Rev. 0, Appendix MASS, Figure MASS-1 and MASS-12 in CRA-2019). This indicates that the alternate locations for installation of ROM salt panel closure system for Panels 1 and 2 will have minimal to no effect on panel-to-panel modeling relationships in PA.

Because the proposed ROM salt panel closures will likely have increased lengths of ROM salt between Panels 1, 2, and 10, there will likely be decreased brine and gas flow communications between these panels, making the representation of these panels in the PA conservative with respect to the modeled behavior of brine and gas flow across these panel regions. The associated changes in PA parameters such as REFCON:VREPOS, REFCON:FVW, and REFCON:AREA_CH would be minimal and have negligible effects as well. Therefore, the proposed dimensions and locations of the panel closures are viewed as functional equivalents to those currently represented in PA.

The work on Panel 2 ROM salt closure is scheduled to begin after the final closure of Panel 7 is completed which is in the April 2022 time frame. Work on Panel 1 ROM salt closure is scheduled to begin after the final closure of Panel 8 is completed which is in the April 2026 timeframe. These dates are subject to change.

If you have any questions, please contact Michael R. Brown at (575) 706-0072.

Sincerely,

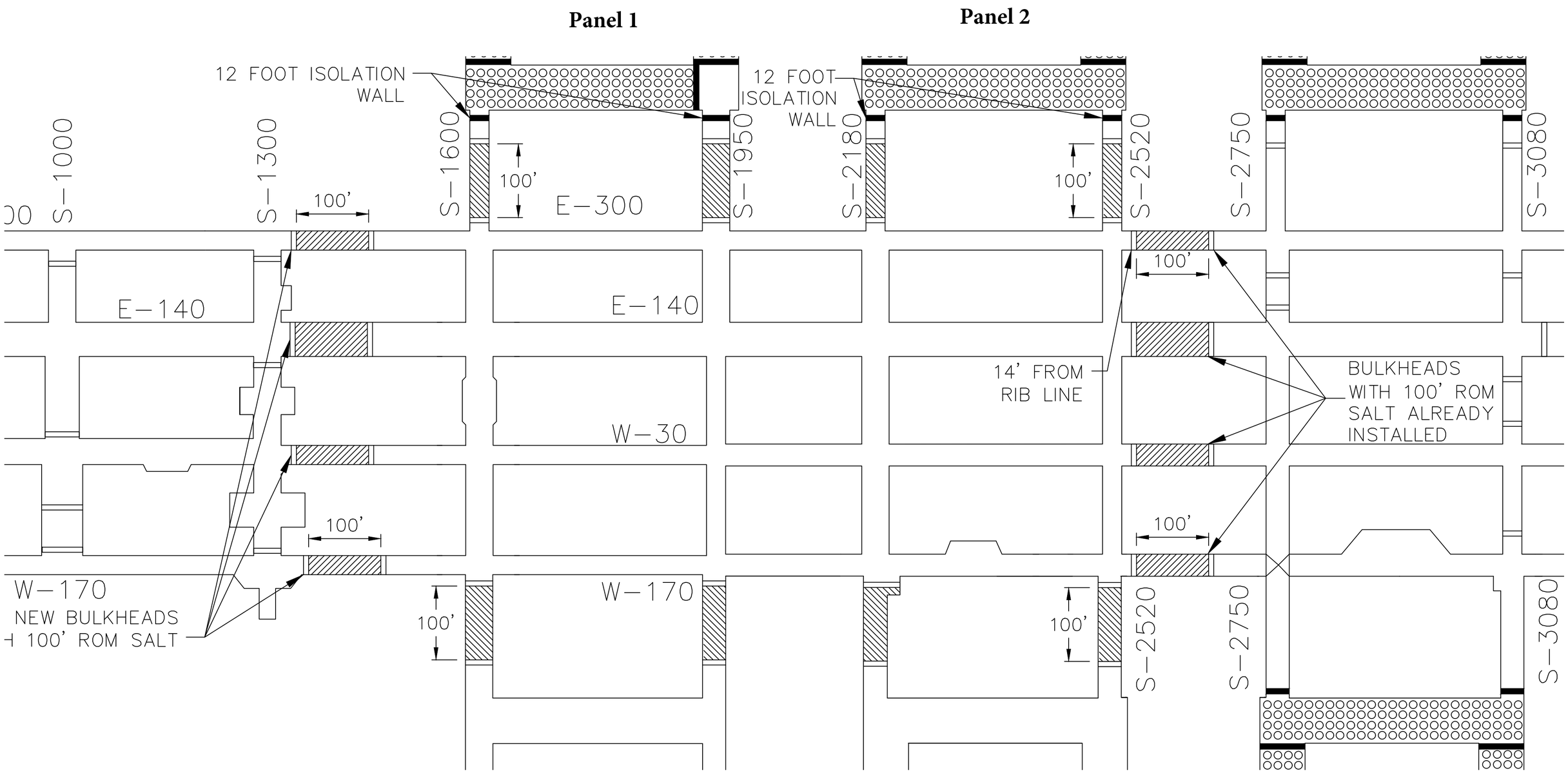
Reinhard Knerr
Manager
Carlsbad Field Office

Enclosures (2)

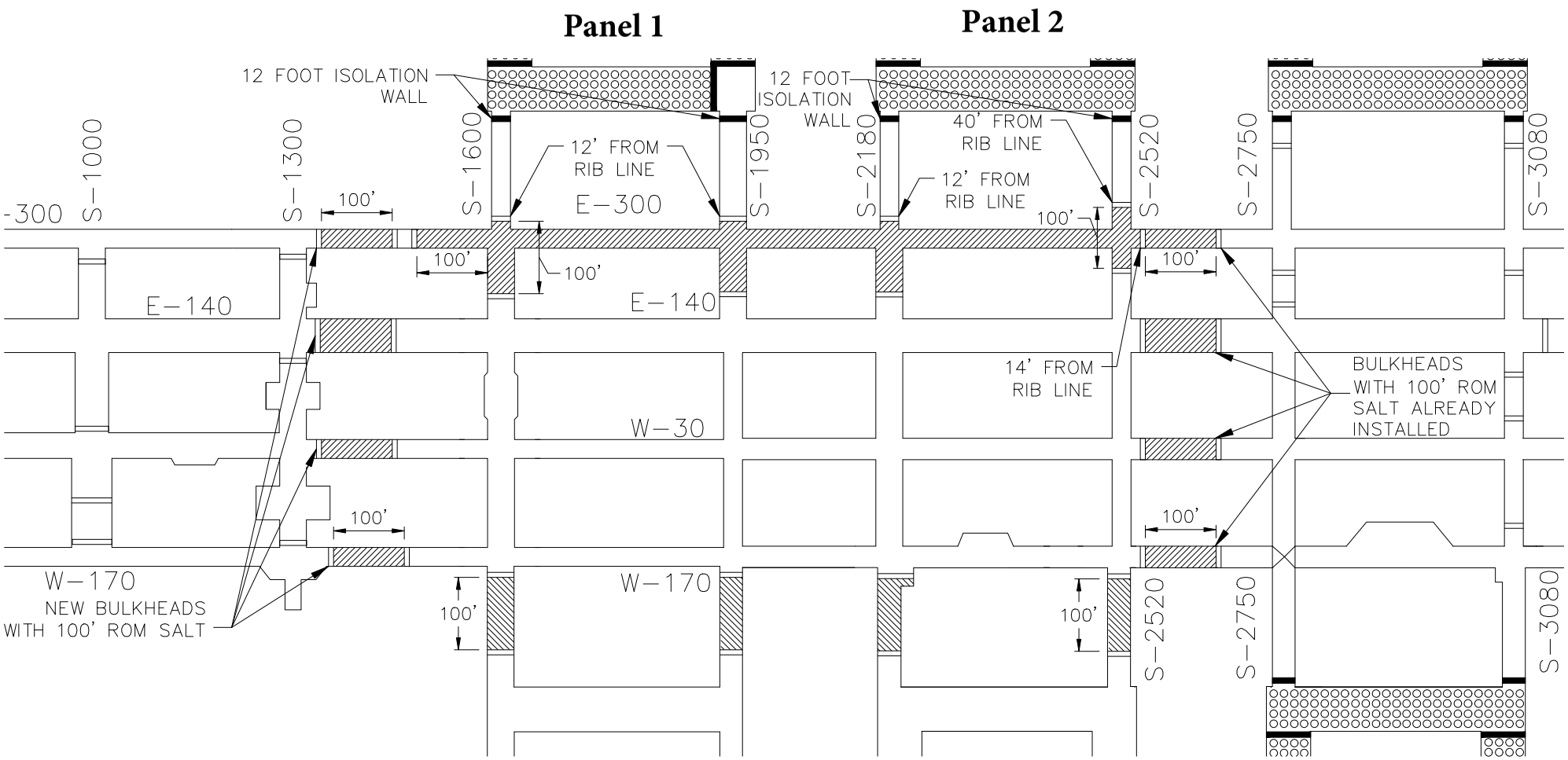
cc: w/enclosures

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Panel Closures As They Would Have Been Before the Proposed Change



DRAWING IS NOT TO SCALE

Proposed Alternate Panel Closure Locations for Panels 1 and 2