UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

October 13, 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 received and reviewed the Department of Energy (DOE) Carlsbad Field Office's (CBFO) June 23, 2021 Planned Change Notice (PCN) and accompanying attachment to excavate five new main access drifts located to the west of the currently mined area of the Waste Isolation Pilot Plant (WIPP). The Agency has also reviewed CBFO's September 13, 2021 response to EPA's inquiry about the status of existing and future panel closures associated with the excavation of the new drifts. It is the Agency's understanding that this PCN and associated documents only address the mining of drifts that could be used to access the utility shaft that is planned and partially constructed, and for accessing potential new waste panels that may be developed sometime in the future. The Agency has already approved the shaft and the two associated access drifts (EPA-HQ-OAR-2019-0534). The two associated access drifts are among the five access drifts that are the subject of DOE's current PCN. In the PCN, DOE has identified that these drifts are for access to potential future waste panels and are not planned to be used as waste panels. The Agency expects DOE would address new waste panels in future planned change submittals.

EPA has not, at this time, identified any concerns that would result in the facility being out of compliance with 40 CFR Part 194. However, EPA notes that the additional access drifts will increase repository footprint and volume, possibly affecting future performance assessment release calculations. Several of the new access drifts, such as the proposed S-550 and S-700, will create a connected pathway that appears to bypass the proposed future northern-most panel closure systems. DOE's documentation confirms (EPA-HQ-OAR-2019-0534) that the northern-most panel closures will be installed, and that the Department has not proposed to change their design. However, the function served by these panel closures could be affected by the proposed new drifts unless panel closure locations are modified. EPA expects DOE to appropriately incorporate the West Mains Access Drifts and any update to the panel closure locations in future performance assessments to capture their impact on projected releases from the repository.

Thank you for submitting this PCN and its supporting material. If you have any questions, please have your staff contact Tom Peake at Peake.Tom@epa.gov and (202) 465-5904.

Sincerely,

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Date: 2021.10.13 14:51:28 -04'00'

Lee Ann B. Veal
Director
Radiation Protection Division

cc: Mark Bollinger, CBFO
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