



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 4 2017

OFFICE OF
AIR AND RADIATION

Mr. Todd Shrader, Manager
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Mr. Shrader:

I have reviewed your letter of October 5, 2017 to Mr. Jonathan Edwards regarding the 2019 Waste Isolation Pilot Plant (WIPP) Compliance Recertification Application (CRA), which is expected by the end of March 2019. In that letter, you stated that DOE would defer submitting a performance assessment with the March 2019 CRA, and indicated that the extra time to address updates would allow you to provide a more meaningful analysis than if you were to submit the performance assessment in March 2019. As we discussed in our meeting of November 8, we understand that you will submit a performance assessment by the end of 2019. As we further discussed, to achieve this date, the U.S. Environmental Protection Agency and the U.S. Department of Energy (DOE) will need to come to an agreement by the end of September 2018 on how to address issues raised in the July 19, 2017 WIPP recertification decision (82 FR 33106). EPA will evaluate all the information submitted by DOE in connection with the March 2019 CRA, whether submitted in March 2019 or thereafter, in making its completeness determination relating to that application, and, subsequently, in making its recertification decision.

To further summarize agreements from the November 8 meeting, this letter identifies two issues that have been resolved for the CRA 2019 performance assessment. In the CRA 2019 performance assessment, for the computer code input parameter to calculate the probability of a drilling intrusion hitting pressurized brine beneath the repository (GLOBAL:PBRINE), the DOE agreed to use the method identified by the EPA in the July 2017 recertification decision and described in the EPA document, "Probability of Encountering Castile Brine Beneath the WIPP Waste Panels Using the TDEM Block Method" (in the EPA's electronic docket at EPA-HQ-OAR-2014-0609). This was the method incorporated by the DOE in the conduct of the SEN4 sensitivity calculations requested by the EPA during the EPA's review of the CRA 2014.

In addition, for the CRA 2019 performance assessment, for the computer code input parameter used to estimate waste shear strength (BOREHOLE: TAUFAIL), the DOE agreed to use 1.60 Pa for the lower bound of the waste shear strength probability distribution. The rationale for using this value is addressed in the July 2017 recertification decision and in the EPA's "Technical Support Document for Section 194.23: EPA Review of Proposed Modification to the Waste Shear Strength Parameter TAUFAIL" (in EPA's electronic docket at EPA-HQ-OAR-2014-0609).

If you have any questions, please contact me at 202-343-9448 (veal.lee@epa.gov) or Tom Peake at 202-343-9765 (peake.tom@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Lee Ann B. Veal". The signature is written in a cursive, flowing style.

Lee Ann B. Veal

Director

Radiation Protection Division

cc:

Jeff Carswell, DOE/CBFO

George Basabilvazo, DOE/CBFO

Russ Patterson, DOE/CBFO

Betsy Forinash, DOE/EM

Jonathan Edwards, EPA

Tom Peake, EPA

Ray Lee, EPA