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**Title 40 CFR Part 191  
Subparts B and C  
Compliance Recertification Application 2014  
for the  
Waste Isolation Pilot Plant  
  
Structure of the CRA-2014**



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

**Carlsbad Field Office  
Carlsbad, New Mexico**

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**Compliance Recertification Application 2014**  
**Structure of the CRA-2014**

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### **Acronyms and Abbreviations**

CCA	Compliance Certification Application
CFR	Code of Federal Regulations
CRA	Compliance Recertification Application
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
WIPP	Waste Isolation Pilot Plant

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## 1 **Structure of the CRA-2014**

2 The format of the 2014 Compliance Recertification Application (CRA-2014) is the same as that  
3 used in the CRA-2009. The CRA-2014 follows the structure and organization of the sections of  
4 40 CFR Part 194. This format aligns with the format used in the U.S. Environmental Protection  
5 Agency’s (EPA’s) Compliance Application Review Documents and is intended to facilitate the  
6 EPA and stakeholder reviews of the application. This format is expected to allow a direct  
7 evaluation of any changed information with respect to previous applications.

8 In each section of the CRA-2014, information that is “new” since the CRA-2009 is located in  
9 Section 7 through Section 9. In most cases, “old” text is unchanged except where it contained  
10 errors or omissions, to reflect changes in references/citations, and to change verb tense in text  
11 describing future events that have now taken place. The CBFO Quality Assurance Program  
12 Document is now included as a reference instead of as an appendix.

13 CRA-2014 Section 23 and Section 34 retain the format that was used in CRA-2009 and differ  
14 slightly from the format described below. In Section 23 and Section 34, the information  
15 contained under “Background,” “1998 Certification Decision,” “Changes in the CRA-2004,”  
16 etc., is provided for each first and second level paragraph of the CFR (194.23(c)(1), 194.23(c)(2),  
17 etc.). In the remainder of the document, information contained under “Background,” “1998  
18 Certification Decision,” “Changes in the CRA-2004,” etc., is provided at the section level (e.g.,  
19 194.15).

20 Each section includes the following components:

- 21 1. **Requirements:** The text of the regulation.
- 22 2. **Background:** The historical context of how the U.S. Department of Energy (DOE) and the  
23 Waste Isolation Pilot Plant (WIPP) have complied with the regulation.
- 24 3. **1998 Certification Decision:** A summary of the Compliance Certification Application  
25 (CCA) and the EPA’s evaluation of compliance to the regulation.
- 26 4. **Changes in the CRA-2004:** An identification and summary of changes from the CCA to the  
27 CRA-2004 directly related to the regulation.
- 28 5. **EPA’s Evaluation of Compliance for the 2004 Recertification:** A summary of the EPA’s  
29 evaluation of the CRA-2004.
- 30 6. **Changes or New Information Between the CRA-2004 and the CRA-2009 (Previously:  
31 Changes or New Information Since the 2004 Recertification):** The changes that resulted  
32 from continuing scientific investigations and operations at the WIPP during the time period  
33 between the submittal of the CRA-2004 and the appropriate data cut-off date of the CRA-  
34 2009.
- 35 7. **EPA’s Evaluation of Compliance for the 2009 Recertification:** A summary of the EPA’s  
36 evaluation of the CRA-2009.

- 1 8. **Changes or New Information Since the CRA-2009:** The changes that resulted from  
2 continuing scientific investigations and operations at the WIPP during the time period  
3 between January 1, 2008, and the CRA-2014 data cut-off date of December 31, 2012.
- 4 9. **References:** References cited in the CRA-2014 documentation. References that were not  
5 submitted in any previous CRA are followed by an asterisk. At the request of the EPA, an  
6 electronic version of the CRA-2014 is included in this application. The electronic version  
7 includes hyperlinks to all references cited in the text, except for copyrighted references.

8

1 Sections, appendices, and attachments included in this application are listed below.

<b><u>CRA-2014 Sections (Corresponding to 40 CFR 194 Sections)</u></b>	<b><u>CRA-2014 Appendices</u></b>	<b><u>CRA-2014 Attachments</u></b>
<ul style="list-style-type: none"> <li>• Structure of the CRA-2014</li> <li>• Executive Summary</li> <li>• 8: Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP</li> <li>• 15: Content of Compliance Recertification Application(s)</li> <li>• 21: Inspections</li> <li>• 22: Quality Assurance</li> <li>• 23: Models and Computer Codes</li> <li>• 24: Waste Characterization</li> <li>• 25: Future State Assumptions</li> <li>• 26: Expert Judgment</li> <li>• 27: Peer Review</li> <li>• 31: Application of Release Limits</li> <li>• 32: Scope of Performance Assessments</li> <li>• 33: Consideration of Drilling Events in Performance Assessments</li> <li>• 34: Results of Performance Assessments</li> <li>• 41: Active Institutional Controls</li> <li>• 42: Monitoring</li> <li>• 43: Passive Institutional Controls</li> <li>• 44: Engineered Barriers</li> <li>• 45: Consideration of the Presence of Resources</li> <li>• 46: Removal of Waste</li> <li>• 51-52: Consideration of Protected Individual and Exposure Pathways</li> <li>• 53: Consideration of Underground Sources of Drinking Water</li> <li>• 54: Scope of Compliance Assessments</li> <li>• 55: Results of Compliance Assessments</li> </ul>	<ul style="list-style-type: none"> <li>• Appendix AUD: Audits and Surveillances</li> <li>• Appendix DATA: Monitoring Data and Reports</li> <li>• Appendix HYDRO: Hydrologic Investigations</li> <li>• Appendix IGP: Individual and Groundwater Protection Requirements</li> <li>• Appendix MASS: Performance Assessment Modeling Assumptions</li> <li>• Appendix MgO: Magnesium Oxide as an Engineered Barrier</li> <li>• Appendix MON: WIPP Monitoring Programs</li> <li>• Appendix PA: Performance Assessment</li> <li>• Appendix PORSURF: Porosity Surface</li> <li>• Appendix SCR: Feature, Event, and Process Screening for Performance Assessment</li> <li>• Appendix SOTERM: Actinide Chemistry Source Team</li> <li>• Appendix TFIELD: Transmissivity Fields</li> </ul>	<ul style="list-style-type: none"> <li>• Attachment A: TFIELD Visualization</li> </ul>

2 There are many cases where an appendix contains technical information similar to that covered  
 3 in a section. In these cases, the section is a summary of the information provided in the  
 4 appendix.

- 1 Figure STRUCT-1 maps all 23 sections and 13 appendices and the relationship of each appendix
- 2 to specific sections in the CRA-2014.

## CRA 2014 Pictorial Roadmap

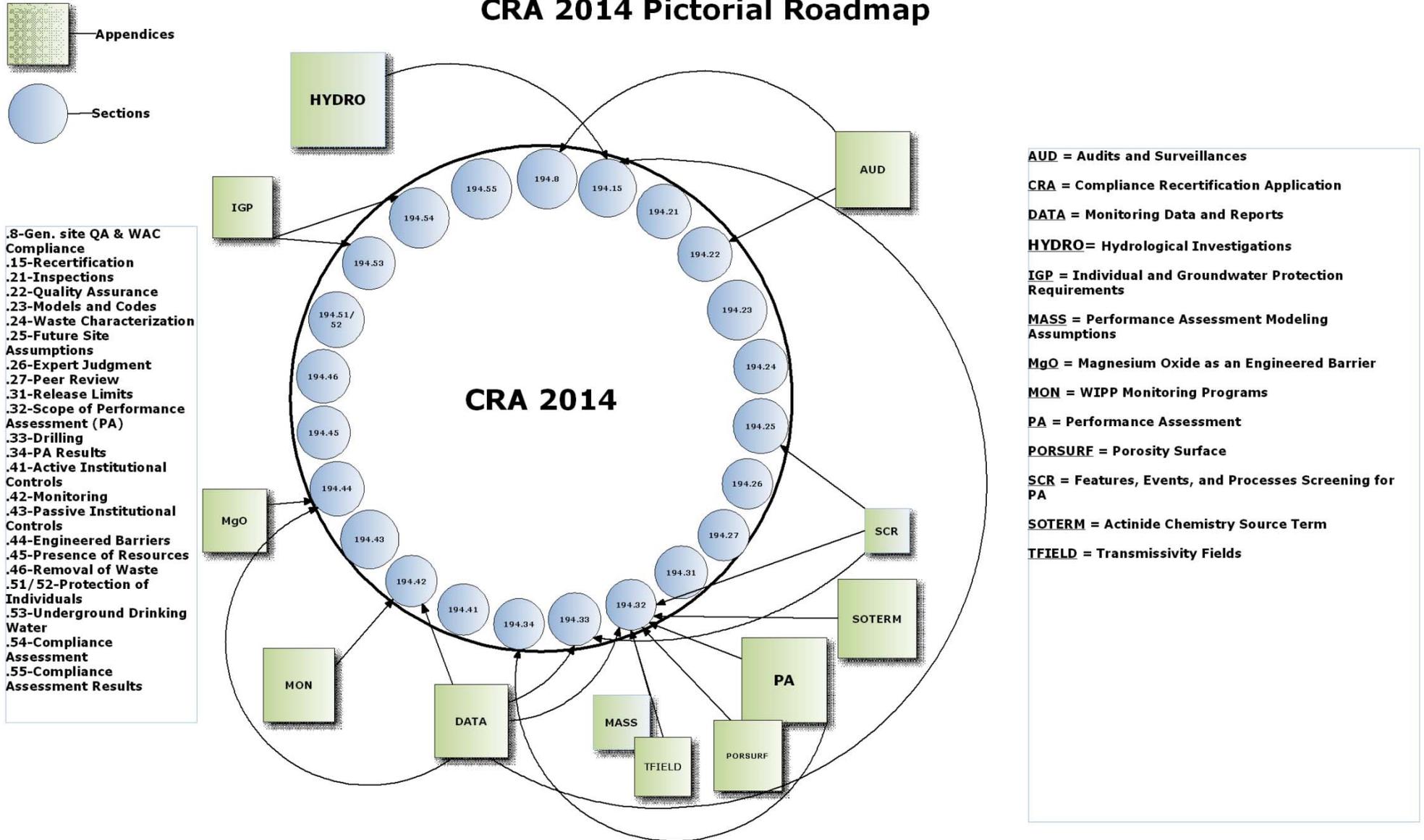


Figure STRUCT-1. CRA-2014 Pictorial Roadmap