40 CFR Part 191
Subparts B and C
Compliance Recertification Application 2026
for the
Waste Isolation Pilot Plant

Structure of the CRA-2026

United States Department of Energy
Waste Isolation Pilot Plant

Carlsbad Field Office
Carlsbad, New Mexico

Compliance Recertification Application 2026
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ACRONYMS AND ABBREVIATIONS

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

1.0 STRUCTURE OF THE CRA-2026

The 2026 Compliance Recertification Application (CRA-2026) is organized to follow the sections/requirements of 40 Code of Federal Regulations (CFR) 194 (U.S. EPA 1996). Each numbered section of the CRA-2026 corresponds to a major section of 40 CFR §194 and the requirements therein. This approach aligns with the organizational method used by the U.S. Environmental Protection Agency (EPA) for its Compliance Application Review Documents and is intended to facilitate the EPA's review of the application.

The application focusses on any new data and new information that have become available since the CRA-2019 (U.S. DOE 2019) data cutoff date (January 8, 2018). This focus on new information and data allows a direct evaluation of any changes in information with respect to previous applications and is consistent with the requirements in 40 CFR § 194.15. Historical information and data from previous compliance applications are consistent with past U.S. Department of Energy (DOE) compliance positions and EPA compliance decisions documented in the CRA-2019.

The numbered sections of the CRA-2026 outline the regulatory requirements and how DOE has continued to meet them. The appendices and their attachments provide the mathematical, physical, and empirical information to support the statements made in the sections.

Each numbered section of the CRA-2026 includes the following components:

1. Requirements: The regulations are defined, and their exact text is provided.

2. Background: A brief description of the historical context of how the DOE and the Waste Isolation Pilot Plant (WIPP) complied with the regulation.

3. Changes or New Information since the CRA-2019: A description of the changes since the most recent compliance application that are relevant and necessary for inclusion as specified by 40 CFR § 194.15. The reporting period for the CRA-2026 is January 9, 2018, to January 10, 2025.

4. References: The list of references cited in each numbered section. The electronic version includes hyperlinks to all references cited in the text, except for copyrighted references.

The Appendices and their attachments provide the following:

1. Appendices: Provide comprehensive, detailed methodologies, scientific analyses, and modeling results supporting the compliance demonstrations outlined in the main numbered sections.

2. Attachments: Subordinate documents appended to specific parent Appendices to provide targeted data updates, specific configurations, modeling parameters, or detailed visualizations (e.g., repository borehole updates or waste container configurations).

An alternate format is used for certain numbered sections, such as those addressing 40 CFR § 194.23 and 194.34, to better align with the structure of the corresponding sections in 40 CFR § 194. Sections and appendices included in CRA-2026 are listed in Table STRUCT-1 below. The application also includes an Executive Summary and attachments to several appendices.

Per section 2.2 of EPA's Guidance to the DOE on Preparation for Recertification of Waste Isolation Pilot Plant with 40 CFR § 191 and 194 Revision 1 (U.S. EPA 2023), DOE will coordinate with the EPA to deliver the CRA 2026 using the Agency preferred method of electronic submission, including references and any other supporting documents.

Table STRUCT-1. Summary of CRA-2026 Contents

CRA-2026 Sections (40 CFR 194 Requirements)	CRA-2026 Appendices	CRA-2026 Attachments
• 8: Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP • 15: Content of Compliance Recertification Application • 21: Inspections • 22: Quality Assurance • 23: Models and Computer Codes • 24: Waste Characterization • 25: Future State Assumptions • 26: Expert Judgment • 27: Peer Review • 31: Application of Release Limits • 32: Scope of Performance Assessments • 33: Consideration of Drilling Events in Performance Assessments • 34: Results of Performance Assessments • 41: Active Institutional Controls • 42: Monitoring • 43: Passive Institutional Controls • 44: Engineered Barriers • 45: Consideration of the Presence of Resources • 46: Removal of Waste • 51-52: Consideration of Protected Individual and Exposure Pathways • 53: Consideration of Underground Sources of Drinking Water • 54: Scope of Compliance Assessments • 55: Results of Compliance Assessments	• Appendix AUD: Audits and Surveillances • Appendix DATA: Monitoring Data and Reports • Appendix GEOCHEM: Implementation of Chemistry Conceptual Models • Appendix HYDRO: Hydrological Investigations • Appendix IGP: Individual and Groundwater Protection Requirements • Appendix MASS: Performance Assessment Modeling Assumptions • Appendix MgO: Magnesium Oxide as an Engineered Barrier • Appendix MON: Compliance Monitoring Program • Appendix PA: Performance Assessment • Appendix PORSURF: Porosity Surface • Appendix SCR: Feature, Event, and Process Screening for Performance Assessment • Appendix SOTERM: Actinide Chemistry Source Term • Appendix TFIELD: Transmissivity Fields • Appendix TRUWASTE: Transuranic Waste Inventory	• Attachment to Appendix DATA o Attachment A: WIPP Borehole Update o Attachment B: WIPP Waste Containers and Emplacement • Attachment to Appendix PA o Attachment Supplemental Final State

2.0 REFERENCES

(*Indicates a reference that has not been previously submitted)

U.S. Department of Energy (DOE). 2019. Title 40 CFR 191 Subparts B and C. Compliance Recertification Application for the Waste Isolation Pilot Plant (March). Carlsbad, NM: Carlsbad Field Office. DOE/WIPP-2019-3609.*

U.S. Environmental Protection Agency (EPA). 1996. 40 CFR 194: Criteria for the Certification and Recertification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal Regulations; Final Rule. *Federal Register*, vol. 61 (February 9, 1996): 5223–5245.

U.S. Environmental Protection Agency (EPA). 2023. Guidance to the U.S. Department of Energy on Preparation for Recertification of the Waste Isolation Pilot Plant with 40 CFR Parts 191 and 194 Revision 1*