

## 6.0 CONTAINMENT REQUIREMENTS

### 6.0.1 Introduction

Because of the amount of material presented in Chapter 6.0 and its complexity, the U.S. Department of Energy (DOE) has provided an introductory summary of Chapter 6.0. Detailed discussions of the topics covered in this summary are found in the remainder of the chapter, which is organized as follows:

- Section 6.1 – the overall system performance assessment methodology used to evaluate compliance with the containment requirements.
- Section 6.2 – a comprehensive list of features, events, and processes (FEPs) that might affect disposal system performance, the screening methodology applied to that list, and the results of the screening process.
- Section 6.3 – development of the scenarios that are considered in the system-level consequence analysis.
- Section 6.4 – the conceptual and computational models used to perform the system-level consequence analysis (performance assessment), the overall flow of information in the performance assessment, the scenario probabilities, and the construction of a performance measure for comparison with the standard.
- Section 6.5 – the results of the performance assessment.

Additional information supporting this chapter is provided in appendices. See Table 1-6 in Chapter 1.0 for a list of these appendices.

### 6.0.2 Overview of Chapter 6.0

The DOE has determined that the Waste Isolation Pilot Plant (WIPP) is in compliance with the Containment Requirements of Title 40 Code of Federal Regulations (CFR) § 191.13. These requirements are stringent and state that the DOE must demonstrate a reasonable expectation that the probabilities of cumulative radionuclide releases from the disposal system during the 10,000 years following closure will fall below specified limits. The performance assessment analyses supporting this determination must be quantitative and must consider uncertainties caused by all significant processes and events that may affect the disposal system, including inadvertent human intrusion into the repository during the future. A quantitative performance assessment is conducted using a series of linked computer models in which uncertainties are addressed by a Monte Carlo procedure for the sampling of selected input parameters.

As required by regulation, results of the performance assessment are displayed as complementary cumulative distribution functions (CCDFs) that display the probability that cumulative radionuclide releases from the disposal system will exceed the values calculated

1 for each scenario considered in the analysis. These CCDFs are calculated using reasonable  
2 and, in some cases conservative, conceptual models that are based on the scientific  
3 understanding of the behavior of the disposal system. Parameters used in these models are  
4 derived from experimental data, field observations, and relevant technical literature. The  
5 overall mean CCDF lies entirely below and to the left of the specified limits, and the WIPP is  
6 therefore in compliance with the containment requirements of 40 CFR Part 191. Sensitivity  
7 analysis of results shows the location of the mean CCDF is dominated by releases of  
8 radionuclides that could occur directly at the ground surface during the inadvertent  
9 penetration of the repository by a future drilling operation. Releases of radionuclides to the  
10 accessible environment resulting from transport in groundwater through the shaft seal systems  
11 and the subsurface geology are negligible, with or without human intrusion, and make no  
12 contribution to the location of the mean CCDF. No releases whatsoever are predicted to  
13 occur at the ground surface in the absence of human intrusion. The natural and engineered  
14 barrier systems of the WIPP provide robust and effective containment of transuranic (TRU)  
15 waste even if the repository is penetrated by multiple borehole intrusions.

#### 16 17 6.0.2.1 Conceptual Basis for the Performance Assessment

18

19 The foundations of the performance assessment lie in a thorough understanding of the disposal  
20 system and the possible future interactions among the repository, the waste, and the  
21 surrounding geology. This application is organized such that site characterization, facility  
22 design, and waste characterization are described separately in Chapters 2.0, 3.0, and 4.0. The  
23 DOE's confidence in the results of the performance assessment is based in part on the  
24 strength of the research done during site characterization, the robustness of the facility design,  
25 and the knowledge of the inventory. Quality assurance activities, described in Chapter 5.0,  
26 demonstrate that the information gathered during these activities is qualified to support the  
27 compliance decision.

28  
29 Chapters 2.0, 3.0, and 4.0 provide the basic descriptions of the main components of the  
30 disposal system. The interactions of the repository and waste with the geologic system, and  
31 the response of the disposal system to possible future inadvertent human intrusion are  
32 described in Section 6.4.

#### 33 34 6.0.2.2 Undisturbed Performance

35

36 An evaluation of undisturbed performance, which is defined by regulation (see 40 CFR  
37 § 191.15 and § 191.2) to exclude human intrusion and unlikely disruptive natural events, is  
38 required by regulation (see 40 CFR § 191.12). Evaluation of past and present natural geologic  
39 processes in the region indicate that none has the potential to breach the repository within  
40 10,000 years. Behavior of the disposal system is dominated by the coupled processes of  
41 deformation of the rock surrounding the excavation, fluid flow, and waste degradation. Each  
42 of these processes can be described independently, but the extent to which each process  
43 occurs will be affected by the others.

44

1 Deformation of the rock immediately around the repository begins as soon as excavation  
2 creates a disturbance in the stress field. Stress relief results in some degree of brittle  
3 fracturing and the formation of a disturbed rock zone (DRZ) surrounding excavations in all  
4 deep mines. For the WIPP, the DRZ is characterized by an increase in permeability and a  
5 decrease in pore pressure, and may ultimately extend a few meters from the excavated region.  
6 Salt will also deform due to deviatoric stress by creep processes and move inward to fill voids.  
7 This process of salt creep will continue until deviatoric stress is dissipated and the system is  
8 once again at stress equilibrium.

9  
10 The ability of salt to creep, thereby healing fractures and filling porosity, is one of the  
11 fundamental advantages of using it as a medium for geologic disposal of radioactive waste and  
12 is one of the reasons it was recommended for use by the National Academy of Sciences. For  
13 the WIPP, salt creep provides the basis for the design of the compacted crushed salt  
14 components of the shaft seal system that will compact to yield properties approaching those of  
15 the intact salt within 200 years. The salt creep will also cause the DRZ surrounding the shaft  
16 to heal rapidly around the concrete components of the seal system. In the absence of elevated  
17 pressure in the repository, salt creep would also eventually result in substantial compaction of  
18 the waste and the healing of the DRZ around the disposal region. Understanding the coupling  
19 of salt creep with fluid flow and waste degradation processes suggests that fluid pressure  
20 within the waste disposal region will be sufficient to maintain significant porosity within the  
21 disposal region throughout the performance period.

22  
23 Characterization of the Salado Formation indicates that fluid flow does not occur on time  
24 scales of interest in the absence of an artificially imposed hydraulic gradient. This lack of  
25 fluid flow is the second fundamental reason for the choice of salt as a medium for geologic  
26 disposal of radioactive waste. Lack of fluid flow is a result of the extremely low permeability  
27 of the evaporite rocks that make up the Salado. Excavation of the repository has disturbed  
28 the natural hydraulic gradient and rock properties and has resulted in fluid flow. Small  
29 quantities of interstitial brine present in the Salado move toward regions of low hydraulic  
30 potential and brine seeps are observed in the underground. The slow flow of brine from halite  
31 into more permeable anhydrite marker beds and then through the DRZ into the repository is  
32 expected to continue as long as the hydraulic potential within the repository is below the  
33 hydraulic potential in the far field. The repository environment will also involve gas, and fluid  
34 flow there must be modeled as a two-phase process. Initially, the gas phase will consist  
35 primarily of air trapped at the time of closure, although other gases will form as a result of  
36 waste degradation. The gas phase pressure will rise due to creep closure, gas generation, and  
37 brine inflow, creating the potential for flow outward from the excavated region.

38  
39 Consideration of waste degradation processes indicates that the role of the gas phase in fluid  
40 flow and the pressure history of the repository will be far more important than would be  
41 expected if the initial air were the only gas present. Degradation of waste can generate  
42 significant additional gas by two processes:

- 43  
44 (1) the generation of hydrogen gas by anoxic corrosion of iron, iron alloys, and aluminum,  
45 and

1 (2) the generation of carbon dioxide and methane by anaerobic microbial degradation of  
2 waste containing cellulose, rubber, or plastic.  
3

4 The coupling of these gas generation reactions to the processes of fluid flow and salt creep is  
5 complex. Gas generation will increase fluid pressure in the repository, thereby decreasing the  
6 hydraulic gradient and deviatoric stress between the far field and the excavated region and  
7 inhibiting the processes of brine inflow and salt creep. Anoxic corrosion will also consume  
8 brine as it breaks down water to oxidize iron and release hydrogen gas. Thus, corrosion has  
9 the potential to be a self-limiting process, in that as it consumes all water in contact with iron,  
10 it will cease. Microbial reactions are also considered to be dependent on the presence of  
11 water to occur, although their net effect is uncertain. It is assumed that microbial reactions  
12 will result in neither the consumption nor creation of water.  
13

14 The total volume of gas that may be generated by corrosion and microbial degradation may be  
15 sufficient to result in repository pressures that approach lithostatic. Sustained pressures above  
16 lithostatic are not physically reasonable within the disposal system, and fracturing of the more  
17 brittle anhydrite layers is expected to occur if sufficient gas is present. The conceptual model  
18 implemented in the performance assessment causes permeability and porosity of the anhydrite  
19 marker beds to increase rapidly as pore pressure approaches and exceeds lithostatic. This  
20 conceptual model for pressure-dependent fracturing approximates the hydraulic effect of  
21 pressure-induced fracturing and allows gas and brine to move more freely within the marker  
22 beds at higher pressures.  
23

24 Overall, the behavior of the undisturbed disposal system will result in extremely effective  
25 isolation of the radioactive waste. Concrete, clay, and asphalt components of the shaft seal  
26 system will provide an immediate and effective barrier to fluid flow through the shafts,  
27 isolating the repository until salt creep has consolidated the compacted crushed salt  
28 components that will permanently seal the shafts. Around the shafts, the DRZ in halite layers  
29 will heal rapidly because the presence of the solid material within the shafts will provide rigid  
30 resistance to creep. The DRZ around the shaft, therefore, will not provide a continuous  
31 pathway for fluid flow. The DRZ is not expected to heal completely around the disposal  
32 region or the operations and experimental regions, and pathways for fluid flow may exist  
33 indefinitely to the overlying and underlying anhydrite layers (Marker Beds [MB] 138 and 139  
34 and anhydrites a and b). Some quantity of brine is expected to be present in the repository  
35 under most conditions and this brine may contain actinides (which dominate the radionuclide  
36 inventory and are therefore the elements of primary regulatory interest) mobilized as both  
37 dissolved and colloidal species. Gas generation by corrosion and microbial degradation is  
38 expected to occur and will result in elevated pressures within the repository. These pressures  
39 will not significantly exceed lithostatic, because fracturing within the more brittle anhydrite  
40 layers will occur and provide a pathway for gas to leave the repository. Fracturing is expected  
41 to enhance gas and brine migration from the repository, but gas transport will not contribute to  
42 the release of actinides from the disposal system. Brine flowing out of the waste disposal  
43 region through anhydrite layers may transport actinides as dissolved and colloidal species, but  
44 the quantity of actinides that may reach the accessible environment boundary during  
45 undisturbed performance through the interbeds is insignificant and has no effect on the

1 compliance determination. No migration of radionuclides whatsoever is expected to occur  
2 vertically through the Salado or through the shaft seal system.

3  
4 6.0.2.3 Disturbed Performance

5  
6 Performance assessment is required by regulation to consider scenarios that include intrusions  
7 into the repository by inadvertent and intermittent drilling for resources. The probability of  
8 these intrusions is based on a future drilling rate of 46.8 boreholes per square kilometer per  
9 10,000 years. This rate is based on consideration of the past record of drilling events in the  
10 Delaware Basin consistent with regulatory criteria. Active institutional controls are assumed  
11 to be completely effective in preventing intrusion during the first 100 years after closure and  
12 passive institutional controls are assumed to be effective in reducing the drilling rate by two  
13 orders of magnitude for the 600 years that follow the 100 years of active control. Future  
14 drilling practices are assumed to be the same as current practice, also consistent with  
15 regulatory criteria. These practices include the type and rate of drilling, emplacement of  
16 casing in boreholes, and the procedures implemented when boreholes are plugged and  
17 abandoned.

18  
19 Results of the performance assessment indicate that human intrusion provides the only  
20 mechanism for significant releases of radionuclides from the disposal system. These releases  
21 may occur by five mechanisms:

- 22  
23 (1) cuttings, which include material intersected by the rotary drilling bit,  
24  
25 (2) cavings, which include material eroded from the borehole wall during drilling,  
26  
27 (3) spallings, which include solid material carried into the borehole during rapid  
28 depressurization of the waste-disposal region,  
29  
30 (4) direct brine releases, which include contaminated brine that may flow to the surface  
31 during drilling, and  
32  
33 (5) long-term brine releases, which include the contaminated brine that may flow through  
34 a borehole after it is abandoned.

35  
36 The first four of these mechanisms operate immediately following the intrusion event and are  
37 collectively referred to as direct releases. The accessible environment boundary for these  
38 releases is the ground surface. The fifth mechanism, actinide transport by long-term  
39 groundwater flow, begins when concrete plugs are assumed to degrade in an abandoned  
40 borehole and may continue throughout the regulatory period. The accessible environment  
41 boundary for these releases may be the land surface or the lateral subsurface limit of the  
42 controlled area.

43  
44 Repository conditions prior to intrusion will be the same as those described for undisturbed  
45 performance and all processes active in undisturbed performance will continue to occur

1 following intrusion. Because intrusion provides a pathway for radionuclides to reach the  
2 ground surface and to enter the geological units above the Salado, additional processes will  
3 occur that are less important in undisturbed performance. These processes include the  
4 mobilization of radionuclides as dissolved and colloidal species in repository brine and  
5 groundwater flow and actinide transport in the overlying units. Flow and transport in the  
6 Culebra Member of the Rustler Formation are of particular interest because this is the unit to  
7 which modeling indicates most flow from a borehole will occur.

8  
9 *6.0.2.3.1 Cuttings and Cavings*

10  
11 In a rotary drilling operation, the volume of material brought to the surface as cuttings is the  
12 cylinder defined by the thickness of the unit being drilled and the diameter of the drill bit. The  
13 quantity of radionuclides released as cuttings is therefore a function only of the activity of the  
14 intersected waste and the diameter of the intruding drill bit. Like all parameters that describe  
15 future drilling activities, the diameter of a drill bit that may intersect waste is speculative. The  
16 DOE uses a constant value of 12.25 inches (0.311 meters), consistent with bits used at the  
17 WIPP depth in the Delaware Basin today. The activity of the intersected waste may vary  
18 depending on the type of waste intersected, and the DOE considers random penetrations into  
19 remote-handled (RH)-TRU waste and each of the 569 different waste types identified for  
20 contact-handled (CH)-TRU waste.

21  
22 The volume of particulate material eroded from the borehole wall and brought to the surface  
23 as cavings may be affected by the drill bit diameter, the effective shear resistance of the  
24 intruded material, the speed of the drill bit, the viscosity of the drilling fluid and the rate at  
25 which it is circulated in the borehole, and other properties related to the drilling process. The  
26 most important of these parameters, after drill bit diameter, is the effective shear resistance of  
27 the intruded material. In the absence of data describing the reasonable and realistic future  
28 properties of degraded waste and backfill, the DOE has used conservative parameter values  
29 based on the properties of fine-grained sediment. Other properties are assigned fixed values  
30 consistent with current practice. The quantity of radionuclides released as cavings depends on  
31 the volume of eroded material and its activity, which is treated in the same manner as the  
32 activity of the cuttings.

33  
34 *6.0.2.3.2 Spallings*

35  
36 Unlike releases from cuttings and cavings, which will occur with every borehole intrusion,  
37 spalling releases will occur only if pressure in the waste-disposal region exceeds the  
38 hydrostatic pressure in the borehole. At lower pressures, below about 8 megapascals, fluid in  
39 the waste-disposal region will not flow toward the borehole. At higher pressures, gas flow  
40 toward the borehole may be sufficiently rapid to entrain particulate waste. If spalling occurs,  
41 the volume of spalled material is affected by the physical properties of the waste, specifically  
42 its tensile strength and particle diameter. As is the case for the effective shear resistance for  
43 the waste, WIPP-specific experimental data are not available to support parameter values for  
44 the tensile strength and average particle diameter of degraded waste and backfill. The DOE

1 has based the parameter values used in the performance assessment on reasonable and  
2 conservative assumptions.

3  
4 The quantity of radionuclides released as spalled material depends on the volume of spalled  
5 waste and its activity. Because spalling may occur at a greater distance from the borehole  
6 than cuttings and cavings, spalled waste is assumed to have the volume-averaged activity of  
7 CH-TRU waste rather than the sampled activities of individual waste streams. RH-TRU waste  
8 is isolated from the spallings process and does not contribute to the volume or activity of  
9 spalled material.

10  
11 *6.0.2.3.3 Direct Brine Flow*

12  
13 Radionuclides may be released to the accessible environment if repository brine enters the  
14 borehole during drilling and flows to the ground surface. The quantity of radionuclides  
15 released by direct brine flow depends on the volume of brine reaching the ground surface and  
16 the concentration of radionuclides contained in the brine. As is the case for spallings, direct  
17 releases of brine will not occur if repository pressure is below the hydrostatic pressure in the  
18 borehole. At higher repository pressures, if mobile brine is present in the repository, it will  
19 flow toward the borehole. If the volume of brine flowing from the repository into the  
20 borehole is small, it will not affect the drilling operation and flow may continue until the driller  
21 reaches the base of the evaporite section and installs casing in the borehole. This length of  
22 time is estimated to be 72 hours, consistent with current practice. Larger brine flows or large  
23 gas flows could cause the driller to lose control of the borehole and fluid flow, in this case,  
24 could continue until repository pressure drops or the hole is contained. The maximum length  
25 of time that such flow would be allowed to continue before the borehole would be controlled  
26 by the driller is 11 days, consistent with current drilling practice in the Delaware Basin.

27  
28 *6.0.2.3.4 Mobilization of Actinides in Repository Brine*

29  
30 Actinides may be mobilized in repository brine in two principal ways:

- 31  
32 (1) as dissolved species, and  
33  
34 (2) as colloidal species.

35  
36 The solubilities of actinides differ among the different oxidation states in which they may  
37 exist, with the more reduced forms (for example, Pu-III or Pu-IV rather than Pu-V or Pu-VI)  
38 being less soluble. Conditions within the repository will be reducing because of the large  
39 quantity of iron in the waste and containers and, in some cases, only the lower solubility  
40 oxidation states will be present. Solubilities also vary with pH. The DOE will therefore  
41 emplace magnesium oxide (MgO) in the waste disposal region with the waste to ensure  
42 conditions that favor minimum actinide solubility. Solubilities in the performance assessment  
43 are based on reducing conditions, MgO backfill, and the chemistry of brines that can be  
44 present in the waste disposal region.  
45

1 The waste contains organic ligands that, under some circumstances, can enhance actinide  
2 concentrations in brine by forming soluble complexes containing actinide ions. However,  
3 these organic ligands also bond strongly to other metals, such as magnesium, that will be  
4 present in far larger quantities in repository brine. Because of this competition effect, organic  
5 ligands will not have a significant effect on overall actinide concentrations in brine.

6  
7 Colloidal transport of actinides has been examined and four types have been determined to  
8 represent the possible behavior at the WIPP. These include microbes, humic substances,  
9 actinide intrinsic colloids, and mineral fragments. Concentrations of actinides mobilized as  
10 these colloidal forms are included in the estimates of total actinide concentrations used in the  
11 performance assessment.

#### 12 13 *6.0.2.3.5 Long-Term Brine Flow up an Intrusion Borehole*

14  
15 Long-term releases to the ground surface or into groundwater in the Rustler or overlying units  
16 may occur after the borehole has been plugged and abandoned. In keeping with regulatory  
17 criteria, borehole plugs are assumed to have the properties consistent with current practice in  
18 the basin. Thus, boreholes are assumed to have concrete plugs emplaced at various locations.  
19 Initially, concrete plugs will be effective in limiting fluid flow in the borehole. However,  
20 under most circumstances, these plugs cannot be expected to remain fully effective  
21 indefinitely. For the purposes of performance assessment, discontinuous borehole plugs  
22 above the repository are assumed to degrade 200 years after emplacement. From then on, the  
23 borehole is assumed to be filled with a silty-sand like material containing degraded concrete,  
24 corrosion products resulting from degradation of casing, and material that sloughs into the  
25 hole from the walls. Of six possible plugged borehole configurations in the Delaware Basin,  
26 three are considered either likely or found to adequately represent other possible  
27 configurations; one configuration (a two-plug configuration) is explicitly modeled.

28  
29 If sufficient brine is available in the repository, and if pressure in the repository is higher than  
30 that in the overlying units, brine may flow up the borehole following degradation of the plugs.  
31 In principle, this brine could flow into any permeable unit or to the ground surface if  
32 repository pressure were high enough. For modeling purposes, brine is allowed to flow only  
33 into the higher permeability units and to the surface. Lower permeability anhydrite and  
34 mudstone layers in the Rustler are treated as if they were impermeable, to simplify the  
35 analysis while maximizing the amount of flow occurring into units where it has a potential to  
36 contribute to releases from the disposal system. Model results indicate that essentially all flow  
37 occurs into the Culebra, which has been recognized since the early stages of site  
38 characterization as the most transmissive unit above the repository and the most likely  
39 pathway for subsurface transport.

#### 40 41 *6.0.2.3.6 Groundwater Flow in the Culebra*

42  
43 Site characterization activities in the units above the Salado have focused on the Culebra.  
44 These activities have shown that the direction of groundwater flow in the Culebra varies  
45 somewhat regionally, but in the area that lies over the site, flow is southward. Regional



1 variation in groundwater flow direction in the Culebra is influenced by the regional variation  
2 in transmissivity observed and also by the shape of and distribution of rock types in the  
3 groundwater basin in which the WIPP is located. Site characterization activities have  
4 demonstrated that there is no evidence of karst groundwater systems in the controlled area,  
5 although groundwater flow in the Culebra is affected by the presence of fractures, fracture  
6 fillings, and vuggy pore features. A zone of relatively high transmissivity in the Culebra in the  
7 southeast portion of the controlled area has been identified as the most important flow path  
8 away from the waste disposal panels, based on analysis of regional groundwater pumping  
9 tests. Other laboratory and field activities have focused on the behavior of dissolved and  
10 colloidal actinides in the Culebra. These characterization and modeling activities conducted  
11 in the units above the Salado confirm that the Culebra is the most transmissive unit above the  
12 Salado. The Culebra is the unit into which actinides are likely to be introduced from long-  
13 term flow up an abandoned borehole.

14  
15 Basin-scale regional modeling of three-dimensional groundwater flow in the units above the  
16 Salado demonstrates that it is appropriate, for the purposes of estimating radionuclide  
17 transport, to conceptualize the Culebra as a two-dimensional confined aquifer. As modeled in  
18 the performance assessment, the steady-state flow field within the Culebra is affected only by  
19 the initial head distribution and the spatial variability of the transmissivity of the unit. Field  
20 data for both transmissivity and head are available from many locations in the Culebra.  
21 Uncertainty in the flow field is incorporated in the analysis through the use of 100 different  
22 geostatistically-based transmissivity fields, each of which is consistent with available head and  
23 transmissivity data.

24  
25 Groundwater flow in the Culebra is modeled as a steady-state process, but two mechanisms  
26 are considered in the performance assessment that could affect flow in the future. Potash  
27 mining in the McNutt Potash Zone (hereafter referred to as the McNutt) of the Salado, which  
28 occurs now in the Delaware Basin outside the controlled area and which may continue to  
29 occur in the future, has the potential to affect flow in the Culebra if subsidence over mined  
30 areas causes fracturing or other changes in rock properties. Climatic changes during the next  
31 10,000 years may also affect groundwater flow by altering recharge to the Culebra.

32  
33 Consistent with regulatory criteria, mining outside the controlled area is assumed to occur in  
34 the near future, and mining within the controlled area is assumed to occur with a probability  
35 of 1 in 100 per century (adjusted for the effectiveness of institutional controls during the first  
36 700 years following closure). Consistent with regulatory guidance, the effects of mine  
37 subsidence are incorporated in the performance assessment by increasing the transmissivity of  
38 the Culebra over the areas identified as mineable by a factor sampled from a uniform  
39 distribution between 1 and 1000. Transmissivity fields used in the performance assessment  
40 are therefore adjusted and steady-state flow fields calculated accordingly, once for the case in  
41 which mining is assumed to occur only outside the controlled area and once for the case in  
42 which mining is assumed to occur both inside and outside the controlled area. Mining outside  
43 the controlled area is considered in both undisturbed and disturbed performance.

1 The extent to which climate will change during the next 10,000 years and the extent to which  
2 such change will affect groundwater flow in the Culebra are uncertain. Regional three-  
3 dimensional modeling of groundwater flow in the units above the Salado indicates that flow  
4 velocities in the Culebra may be increased by a factor of between 1 and 2.25 for reasonably  
5 possible future climates. This uncertainty is incorporated in the performance assessment by  
6 scaling the calculated steady-state specific discharge within the Culebra by a sampled  
7 parameter within this range.  
8

9 *6.0.2.3.7 Actinide Transport in the Culebra*

10  
11 Field tests have shown that the Culebra is best characterized as a double porosity medium for  
12 the purposes of estimating contaminant transport in groundwater. Groundwater flow and  
13 advective transport of dissolved species or colloidal particles occurs primarily in a small  
14 fraction of the total porosity of the rock and thus corresponds to the porosity of open and  
15 interconnected fractures and vugs. Diffusion and slower flow occur in the remainder of the  
16 porosity, which is associated with the low-permeability dolomite matrix. Transported species,  
17 including actinides if present, will diffuse into this porosity.  
18

19 Diffusion out of the advective porosity into the dolomite matrix will retard actinide transport  
20 by two mechanisms. Physical retardation occurs simply because actinides that diffuse into the  
21 matrix are no longer transported with the flowing groundwater. Transport is interrupted until  
22 they diffuse back into the advective porosity. In situ tracer tests have been conducted to  
23 demonstrate this phenomenon. Chemical retardation also occurs within the matrix as  
24 actinides are sorbed onto dolomite grains. The relationship between sorbed and liquid  
25 concentrations is assumed to be linear, and the distribution coefficients ( $K_d$ s) that characterize  
26 the extent to which actinides will sorb on dolomite are based on experimental data.  
27

28 Modeling indicates that physical and chemical retardation, as supported by field tests and  
29 laboratory experiments, will be extremely effective in reducing the transport of dissolved  
30 actinides in the Culebra. Experimental work has demonstrated that transport of colloidal  
31 actinides is not a significant mechanism in the Culebra. As a result, actinide transport through  
32 the Culebra to the subsurface boundary of the controlled area is not a significant pathway for  
33 releases from the WIPP. As discussed in Section 6.5.3, the location of the mean CCDF that  
34 demonstrates compliance with the containment requirements of 40 CFR § 191.13 is  
35 determined entirely by direct releases at the ground surface during drilling (cuttings, cavings,  
36 and spillings).  
37

38 *6.0.2.3.8 Intrusion Scenarios*

39 Human intrusion scenarios evaluated in the performance assessment include both single  
40 intrusion events and combinations of multiple boreholes. Two different types of boreholes are  
41 considered:  
42

- 43 (1) those that penetrate a pressurized brine reservoir in the underlying Castile Formation,  
44 and  
45

1 (2) those that do not.  
2

3 The presence of a brine reservoir under the repository is speculative, but cannot be ruled out  
4 by available information. A pressurized brine reservoir was encountered at the WIPP-12  
5 borehole within the controlled area to the northwest of the disposal region and other  
6 pressurized brine reservoirs have been encountered elsewhere in the Delaware Basin that are  
7 associated with regions of deformation in the Castile. Based on a geostatistical analysis of the  
8 distribution of brine encounters in the region, the DOE has estimated that there is a 0.08  
9 probability that any random borehole that penetrates waste in the WIPP will also penetrate an  
10 underlying brine reservoir. Properties are assigned to the hypothetical reservoir (for example,  
11 its pressure and volume) that are consistent with the available information from tests at  
12 WIPP-12 and other boreholes. These properties are also made consistent with the  
13 hypothetical reservoir's location under the waste disposal region.  
14

15 The primary consequence of penetrating a pressurized reservoir will be to provide an  
16 additional source of brine beyond that which flows into the repository from the Salado. Direct  
17 releases at the ground surface resulting from the first intrusion into the repository will be  
18 unaffected by the presence of additional Castile brine even if it flows to the surface, because  
19 brine moving straight up a borehole will not mix significantly with waste. The presence of  
20 Castile brine has the potential to increase radionuclide releases significantly in two ways,  
21 however. First, the volume of contaminated brine that could flow to the surface may be  
22 greater for a second or subsequent intrusion into a repository that has already been connected  
23 to a Castile reservoir. Second, the volume of contaminated brine that may flow up an  
24 abandoned borehole after plugs have degraded may be greater for combinations of two or  
25 more boreholes that intrude the same panel if one of the boreholes penetrates a pressurized  
26 reservoir. Both processes are modeled in the performance assessment.  
27

#### 28 6.0.2.4 Compliance Demonstration Method

29  
30 The DOE's approach to demonstrating compliance is the performance assessment  
31 methodology described in Section 6.1. The performance assessment process is based on a  
32 comprehensive consideration of the features, events, and processes that are relevant to  
33 disposal system performance. Those features, events, and processes that are shown by  
34 screening analyses to have the potential to affect performance are included in quantitative  
35 calculations using a system of linked computer models to describe the interaction of the  
36 repository with the natural system, both with and without human intrusion. Uncertainty is  
37 incorporated in the analysis through a Monte Carlo approach in which multiple simulations (or  
38 realizations) are completed using sampled values for 57 imprecisely known or naturally  
39 variable input parameters. Distribution functions are constructed that characterize the state of  
40 knowledge for these parameters, and each realization of the modeling system uses a different  
41 set of sampled input values. A sample size of 100 results in 100 different values of each  
42 parameter. Therefore, there are 100 different sets (vectors) of input parameter values.  
43 Quality assurance activities, described in Chapter 5.0, demonstrate that the parameters,  
44 software, and analysis used in the performance assessment were the result of a rigorous  
45 process conducted under controlled conditions.

1 Probabilities of scenarios composed of specific combinations of features, events, and  
2 processes are estimated based on regulatory criteria (applying to the probability of future  
3 human action) and the understanding of the natural and engineered systems. Cumulative  
4 radionuclide releases from the disposal system are calculated for each scenario considered  
5 and probabilities of the scenarios are summed for each realization of the modeling system to  
6 construct distributions of CCDFs. Sampling of the input parameters was performed in three  
7 separate replicates resulting in three independent distributions of CCDFs and allowing the  
8 construction of three independent mean CCDFs, each based on 100 individual CCDFs.  
9

#### 10 6.0.2.5 Results of the Performance Assessment

11  
12 Section 6.5 addresses the Containment Requirements of 40 CFR Part 191 and the associated  
13 criteria of 40 CFR § 194.34. Section 6.5 presents distributions of CCDFs for each replication  
14 of the analysis, mean CCDFs, and an overall mean CCDF, together with the 95 percent  
15 confidence interval estimated from the distribution of the three independent means.  
16

17 Families of CCDFs and mean CCDFs for each of the three replicates are also shown in  
18 Section 6.5. All 300 individual CCDFs lie below and to the left of the limits specified in  
19 40 CFR § 191.13(a). The overall mean CCDF determined from the three replicates lies  
20 entirely below and to the left of the limits specified in 40 CFR § 191.13(a). Thus, the WIPP is  
21 in compliance with the containment requirements of 40 CFR Part 191. Comparison of the  
22 results of the three replicates indicates that the sample size of 100 in each replicate is  
23 sufficient to generate a stable distribution of outcomes. Within the region of regulatory  
24 interest (that is, at probabilities greater than  $10^{-3}/10^4$  yr), the mean CCDFs from each replicate  
25 are essentially indistinguishable from the overall mean.  
26

27 As discussed in Section 6.5, examination of the normalized releases resulting from cuttings  
28 and cavings, spallings, and direct brine release provides insight into the relative importance of  
29 each release mode in terms of its contribution to the location of the mean CCDF and the  
30 compliance determination. Releases from cuttings and cavings dominate the mean CCDF.  
31 Spallings make a small contribution. Direct brine releases are less important and have very  
32 little effect on the location of the mean. Subsurface releases resulting from groundwater  
33 transport are less than  $10^{-6}$  EPA units and make no contribution to the location of the mean  
34 CCDF.  
35

36 Uncertainties characterized in the natural system and the interaction of waste with the  
37 disposal system environment have little effect on the location of the mean CCDF, providing  
38 additional confidence in the compliance determination. The natural and engineered barrier  
39 systems of the WIPP provide robust and effective containment of TRU waste even if the  
40 repository is penetrated by multiple borehole intrusions.  
41

### 42 **6.1 Performance Assessment Methodology**

43  
44 The U.S. Environmental Protection Agency (EPA), in 40 CFR Part 191, specifies the  
45 generally applicable environmental standards for the protection of public health and the

1 environment for the disposal of TRU and high-level radioactive wastes. In this chapter, the  
2 DOE addresses compliance with the Containment Requirements of 40 CFR § 191.13 and the  
3 associated portions of 40 CFR Part 194.

4  
5 The complete text of the 40 CFR § 191.13 Containment Requirements follows:

- 6  
7 (a) Disposal systems for spent nuclear fuel or high-level or transuranic  
8 radioactive wastes shall be designed to provide a reasonable expectation,  
9 based on performance assessments, that the cumulative releases of  
10 radionuclides to the accessible environment for 10,000 years after disposal  
11 from all significant processes and events that may affect the disposal system  
12 shall:
- 13
- 14 (1) Have a likelihood of less than one chance in 10 of exceeding the quantities  
15 calculated according to Table 1 (Appendix A); and
- 16
- 17 (2) Have a likelihood of less than one chance in 1,000 of exceeding ten times the  
18 quantities calculated according to Table 1 (Appendix A).
- 19
- 20 (b) Performance assessments need not provide complete assurance that the  
21 requirements of § 191.13(a) will be met. Because of the long time period  
22 involved and the nature of the events and processes of interest, there will  
23 inevitably be substantial uncertainties in projecting disposal system  
24 performance. Proof of the future performance of a disposal system is not to be  
25 had in the ordinary sense of the word in situations that deal with much shorter  
26 time frames. Instead, what is required is a reasonable expectation, on the  
27 basis of the record before the implementing agency, that compliance with  
28 § 191.13(a) will be achieved.
- 29

30 The term accessible environment is defined as “(1) The atmosphere; (2) land surfaces;  
31 (3) surface waters; (4) oceans; and (5) all of the lithosphere that is beyond the controlled  
32 area” (40 CFR § 191.12). Further, controlled area means “(1) A surface location, to be  
33 identified by passive institutional controls, that encompasses no more than 100 square  
34 kilometers and extends horizontally no more than five kilometers in any direction from the  
35 outer boundary of the original location of the radioactive wastes in a disposal system; and (2)  
36 the subsurface underlying such a surface location” (40 CFR § 191.12). The controlled area  
37 established by the Land Withdrawal Act is shown in Figure 3-1 (see Chapter 3.0). The release  
38 limits listed in Appendix A of 40 CFR Part 191 are reproduced as Table 6-1.

39

40 For a release to the accessible environment that involves a mix of radionuclides, the limits in  
41 Table 6-1 are used to determine a normalized release (*nR*) of radionuclides for comparison  
42 with the release limits

43

(1)

44 where

- 1       $Q_i$  = cumulative release in curies ( $C_i$ ) of radionuclide  $i$  into the accessible environment  
 2                    during the 10,000-year period following closure of the repository.  
 3       $L_i$  = release limit in curies for radionuclide  $i$  given in Table 6-1.  
 4       $C$  = amount of curies of TRU waste emplaced in the repository. (As described in  
 5                    Section 4.1, TRU wastes contain alpha-emitting transuranic radionuclides with  
 6                    half-lives greater than 20 years.)

7  
 8                    **Table 6-1. Release Limits for the Containment Requirements**  
 9                    **(EPA 1985, Appendix A, Table 1)**

Radionuclide	Release Limit $L_i$ per 1,000 MTHM <sup>a</sup> or Other Unit of Waste (curies)
Americium-241 or -243	100
Carbon-14	100
Cesium-135 or -137	1,000
Iodine-129	100
Neptunium-237	100
Plutonium-238, -239, -240, or -242	100
Radium-226	100
Strontium-90	1,000
Technetium-99	10,000
Thorium-230 or -232	10
Tin-126	1,000
Uranium-233, -234, -235, -236, or -238	100
Any other alpha-emitting radionuclide with a half-life greater than 20 years	100
Any other radionuclide with a half-life greater than 20 years that does not emit alpha particles	1,000

28      <sup>a</sup> Metric tons of heavy metal exposed to a burnup between 25,000 megawatt-days per metric ton  
 29                    of heavy metal (MWd/MTHM) and 40,000 MWd/MTHM.

30      As indicated in Note 1(e) to Table 1 in Appendix A of 40 CFR Part 191, the “other unit of  
 31      waste” for TRU waste shall be “an amount of transuranic wastes containing 1 million curies of  
 32      alpha-emitting transuranic radionuclides with half-lives greater than 20 years.”

33  
 34      Performance assessments are the basis for addressing the containment requirements. 40 CFR  
 35      § 191.12 defines performance as follows:

36  
 37                    “Performance assessment” means an analysis that: (1) identifies the processes and events that  
 38                    might affect the disposal system; (2) examines the effects of these processes and events on the  
 39                    performance of the disposal system; and (3) estimates the cumulative releases of radionuclides,  
 40                    considering the associated uncertainties, caused by all significant processes and events.  
 41

1 The DOE's methodology for performance assessment uses information about the disposal  
2 system and the waste to evaluate performance in a regulatory context over the 10,000-year  
3 regulatory time period.  
4

5 The general theory for conducting a performance assessment is presented in this section  
6 together with details specific to the performance assessment conducted for the WIPP.  
7 Figure 6-1 illustrates the general, high-level steps used by the DOE for this final performance  
8 assessment of the WIPP. In this figure, the sections of this chapter are indicated in which  
9 these steps are discussed in detail, and it shows several important features of the WIPP  
10 performance assessment. It indicates the points at which regulatory standards and guidance  
11 (40 CFR Part 191 and related documents) are most influential, and it shows that there can be  
12 an iterative process between site characterization and performance assessment that facilitates  
13 improvement in both characterization data and performance assessment. Through this  
14 process, the DOE has used early site characterization information and design specifications to  
15 develop preliminary performance assessments, from which sensitivity analyses were used to  
16 guide further characterization of important features of the site data collection on specific  
17 topics and to further develop the repository design.  
18

19 Section 6.1 presents the basis for the methodology shown in Figure 6-1. Section 6.1.1  
20 presents the conceptualization of risk, Section 6.1.2 discusses the characterization of  
21 uncertainty in risk, Section 6.1.3 discusses regulatory criteria for the quantification of risk,  
22 Section 6.1.4 discusses calculation of risk, and Section 6.1.5 discusses techniques for  
23 probabilistic analysis.  
24

### 25 **6.1.1 Conceptualization of Risk**

26  
27 Performance assessment of the WIPP is fundamentally concerned with the evaluation of risk,  
28 for which comparative measures are defined by regulatory standards. For comparison with  
29 these standards, the DOE uses a conceptualization for risk similar to that developed for risk  
30 assessments of nuclear power plants. This description provides a structure on which both the  
31 representation and calculation of risk can be based.

1 Kaplan and Garrick (1981, 11 – 12) have presented the representation of risk as a set of  
 2 ordered triples. The DOE uses this representation and defines risk to be a set R of the form

$$3 \quad 4 \quad R = [(S_i, pS_i, \mathbf{cS}_i), i = 1, \dots, nS], \quad (2)$$

5 where

- 6  $S_i$  = a set of similar occurrences
- 7  $pS_i$  = probability that an occurrence in set  $S_i$  will take place
- 8  $\mathbf{cS}_i$  = a vector of consequences associated with  $S_i$
- 9  $nS$  = number of sets selected for consideration

10  
 11 and the sets  $S_i$  have no occurrences in common (that is, the  $S_i$  are disjoint sets). This  
 12 representation formally decomposes risk into what can happen (the  $S_i$ ), how likely things are  
 13 to happen (the  $pS_i$ ), and the consequences of what can happen (the  $\mathbf{cS}_i$ ). In the WIPP  
 14 performance assessment, the  $S_i$  are scenarios, the  $pS_i$  are scenario probabilities, and the vector  
 15  $\mathbf{cS}_i$  contains consequences associated with scenario  $S_i$ . Development of scenarios for the  
 16 WIPP is discussed in Sections 6.1.2, 6.2, and 6.3. Scenario probabilities and consequence  
 17 determination are discussed in Section 6.4.  
 18

19  
 20 As discussed in the following sections of this chapter, risk in the set R can be displayed using  
 21 CCDFs, as required by the EPA. As stated in 40 CFR § 194.34(a),

22 The results of performance assessments shall be assembled into “complementary, cumulative  
 23 distribution functions” (CCDFs) that represent the probability of exceeding various levels of  
 24 cumulative release caused by all significant processes and events.  
 25

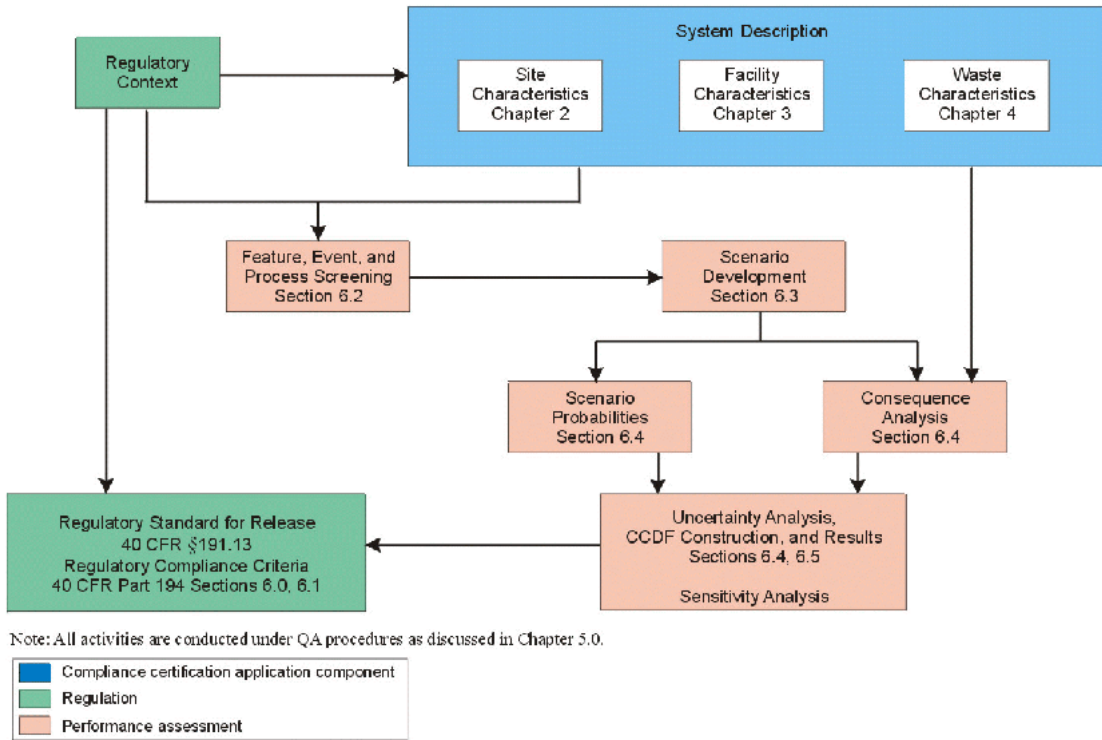
26  
 27 In the context of Equation 2, CCDFs provide information about the consequences  $\mathbf{cS}_i$  and the  
 28 probabilities  $pS_i$  associated with the scenarios  $S_i$ . The probability that  $\mathbf{cS}$  exceeds a specific  
 29 consequence value  $x$  is determined by the CCDF  $F$  defined by  
 30

$$(3)$$

31 where the particular consequence result  $\mathbf{cS}$  under consideration is ordered so that  $\mathbf{cS}_i \leq \mathbf{cS}_{i+1}$   
 32 for  $i=1, \dots, nS-1$ , and  $i$  is the smallest integer such that  $\mathbf{cS}_i > x$ . The function  $F$  represents the  
 33 probabilities that consequence values plotted on the abscissa will be exceeded. A  
 34 diagrammatic example of an estimation of  $F$  is shown in Figure 6-2. The steps in the CCDF  
 35 shown in Figure 6-2 result from the evaluation of  $F$  with a discrete number of possible  
 36 occurrences (that is, futures) represented in the sets  $S_i$ . Unless the underlying processes are  
 37 inherently disjoint, the use of more sets  $S_i$  will tend to reduce the size of these steps and, in the  
 38 limit, will result in a smooth curve. To avoid a broken appearance, the DOE plots estimated  
 39 CCDFs with vertical lines added at the discontinuities.



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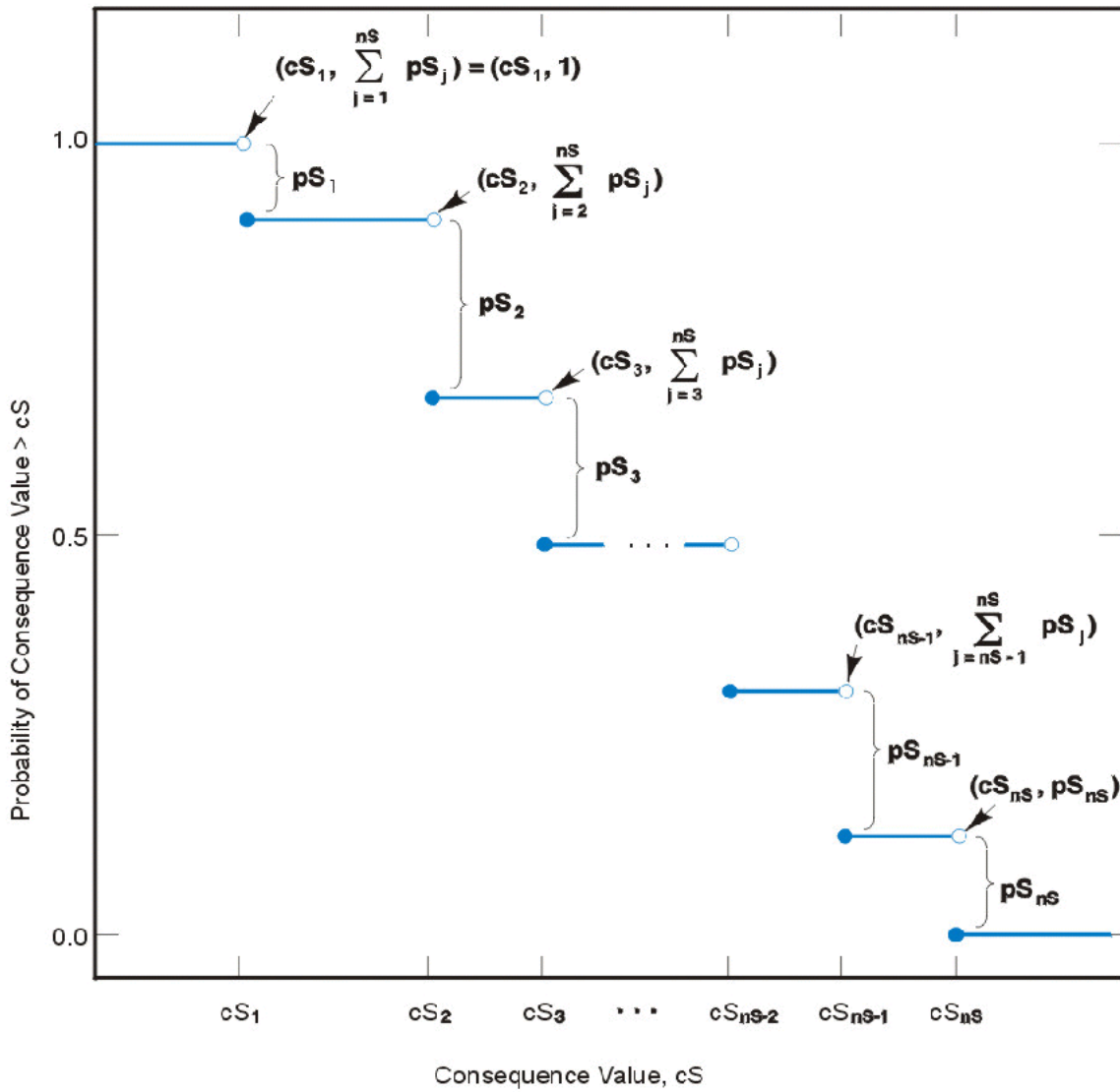


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Figure 6-1. Methodology for Performance Assessment of the WIPP

- 1
- 2
- 3
- 4
- 5
- 6
- 7

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Note: The open and solid circles at the discontinuities indicate the points included on (solid circles) and excluded from (open circles) the CCDF.

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**Figure 6-2. Estimated CCDF For Consequence Results**

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1 **6.1.2 Characterization of Uncertainty in Risk**

2  
 3 The DOE defines uncertainty in the analysis as either stochastic uncertainty or subjective  
 4 uncertainty. Stochastic uncertainty derives from lack of knowledge about the future.  
 5 Subjective uncertainty derives from lack of knowledge about quantities, properties, or  
 6 attributes that are believed to have single or certain values. Stochastic uncertainty can be  
 7 further subdivided into completeness, aggregation, and stochastic variation. Completeness  
 8 refers to the extent that a performance assessment includes all possible occurrences for the  
 9 system under consideration. In terms of the risk representation in Equation 2, completeness  
 10 deals with whether all significant occurrences are included in the union of the sets  $S_i$ . The  
 11 DOE addresses completeness in its development of scenarios, discussed here and in  
 12 Sections 6.2 and 6.3. Aggregation refers to the division of the possible occurrences into the  
 13 sets  $S_i$ . Resolution is lost if the  $S_i$  are defined too coarsely (for example, if  $nS$  is too small).  
 14 Computational efficiency is affected if  $nS$  is too large. Aggregation gives rise to the steps in a  
 15 single CCDF, as shown in Figure 6-2. The DOE addresses aggregation uncertainty in Sections  
 16 6.1.4 and 6.4.13. Stochastic variation is represented by the probabilities  $pS_i$ , which are  
 17 functions of the many factors that affect the occurrence of the individual sets  $S_i$ . The DOE  
 18 addresses stochastic variation in Sections 6.1.4 and 6.4.12.

19  
 20 Stochastic uncertainty can be characterized in performance assessment by evaluating the  
 21 probability of future events (for example, by assuming that the occurrence of certain future  
 22 events will be random in space and time), and by consideration of imprecisely known system  
 23 properties directly associated with the future events. These imprecisely known system  
 24 properties can be expressed as variables represented by the vector

25  
 26 
$$\mathbf{x}_{st} = [x_{st,1}, x_{st,2}, \dots, x_{st,nV(st)}], \tag{4a}$$

27  
 28 where each  $x_{st,j}$  [ $j = 1, 2, \dots, nV(st)$ ] is an imprecisely known property required in the analysis,  
 29  $nV$  is the total number of such properties associated with stochastic uncertainty, and the  
 30 subscript  $st$  denotes stochastic uncertainty.

31  
 32 Subjective uncertainty results from incomplete data or measurement uncertainty. These  
 33 uncertainties are addressed in Section 6.4. Subjective quantities, properties, or attributes may  
 34 be associated with stochastic uncertainties (events that might occur in the future).

35  
 36 Subjective uncertainty can be characterized in performance assessment by consideration of  
 37 system properties that are imprecisely known. These imprecisely known system properties can  
 38 be expressed as variables represented by vectors

39  
 40 
$$\mathbf{x}_{su} = [x_{su,1}, x_{su,2}, \dots, x_{su,nV(su)}], \tag{4b}$$

41  
 42 where each  $x_{su,j}$  [ $j = 1, 2, \dots, nV(su)$ ] is an imprecisely known property required in the  
 43 analysis,  $nV$  is the total number of such properties associated with subjective uncertainty, and  
 44 the subscript  $su$  denotes subjective uncertainty.

1 If the analysis has been developed such that each  $x_j$  is a quantity for which the overall analysis  
 2 requires a single value, the representation for risk in Equation 2 can be restated as a function  
 3 of  $\mathbf{x}_{st}$  and  $\mathbf{x}_{su}$ :

$$4 \quad R(\mathbf{x}_{su}) = [S_i(\mathbf{x}_{su}), pS_i(\mathbf{x}_{su}), \mathbf{c}S_i(\mathbf{x}_{st,i}, \mathbf{x}_{su}), i = 1, \dots, nS(\mathbf{x}_{st}, \mathbf{x}_{su})], \quad (5)$$

6 where  $\mathbf{x}_{st,i}$  is included in  $S_i$ . Probability distributions are then assigned to the individual  
 7 variables  $x_{su,j}$  and  $x_{st,j}$  as defined in Equation 4. These probability distributions are of the form

$$8 \quad D_{st,1}, D_{st,2}, \dots, D_{st,nV(st)}, \quad (6a)$$

$$9 \quad D_{su,1}, D_{su,2}, \dots, D_{su,nV(su)}, \quad (6b)$$

10 where the  $D_j$ 's are the distributions developed for the variables  $x_j, j = 1, 2, \dots, nV$ , and the  
 11 subscripts  $st$  and  $su$  denote distributions associated with  $\mathbf{x}_{st}$  or  $\mathbf{x}_{su}$ . The definition of these  
 12 distributions may also be accompanied by the specification of correlations and various  
 13 restrictions that further define the possible relations among the  $x_j$ . These distributions (along  
 14 with specified correlations or restrictions) probabilistically specify what the appropriate input  
 15 to use in the performance assessment calculations might be, given that the analysis is  
 16 structured so that only one value can be used for each variable,  $x_j$ , under consideration for a  
 17 particular calculation.

18 Monte Carlo techniques can be used to determine the uncertainty in  $R(\mathbf{x}_{su})$  associated with  
 19 both  $\mathbf{x}_{st}$  and  $\mathbf{x}_{su}$ . The theory of this technique is similar for characterization of both stochastic  
 20 and subjective uncertainty. This technique as applied to determining the risk  $R(\mathbf{x}_{su})$  associated  
 21 with  $\mathbf{x}_{su}$  is developed in the following paragraphs.

22 Once the distributions in Equation 6b have been developed, a sample

$$23 \quad \mathbf{x}_k = (x_{k1}, x_{k2}, \dots, x_{k,nV}), k = 1, \dots, nK \quad (7)$$

24 is generated according to the specified distributions and restrictions where  $nK$  is the size of the  
 25 sample. Performance assessment calculations are then performed for each sample element  $\mathbf{x}_k$ ,  
 26 which yields a sequence of risk results of the form

$$27 \quad R(\mathbf{x}_k) = \{[S_i(\mathbf{x}_k), pS_i(\mathbf{x}_k), \mathbf{c}S_i(\mathbf{x}_k)], i = 1, \dots, nS(\mathbf{x}_k)\} . \quad (8)$$

28 Each set  $R(\mathbf{x}_k)$  is the result of one complete set of calculations performed with a set of inputs  
 29 (that is,  $\mathbf{x}_k$ ) obtained from the distributions assigned in Equation 6b. Further, associated with  
 30 each risk result  $R(\mathbf{x}_k)$  in Equation 8 is a weight<sup>1</sup> that can be used in making probabilistic  
 31 statements about the distribution of  $R(\mathbf{x})$ .

---

<sup>1</sup> In random or Latin hypercube sampling (LHS), this weight is the reciprocal of the sample size (that is,  $1/nK$ ) and can be used in estimating means, cumulative distribution functions, and other statistical properties. This weight is often referred to as the probability for each observation (that is, sample  $\mathbf{x}_k$ ). However, this usage is not technically correct. If continuous distributions are involved, the actual probability of each observation is zero.

1 A single CCDF can be produced for each set  $R(x_k)$  of results shown in Equation 8, yielding a  
2 family of CCDFs of the form shown in Figure 6-3. The distribution of CCDFs in Figure 6-3  
3 can be summarized with the mean and percentile curves shown in Figure 6-4. These curves  
4 result from connecting the mean and percentile values corresponding to individual  
5 consequence values on the abscissa of Figure 6-3. The percentile curves provide a  
6 probabilistic representation of the estimated exceedance probability given a fixed  
7 consequence value. For example, the probability is 0.8 that the exceedance probability for a  
8 particular normalized release is located between the 10 and 90 percentile curves.

9  
10 To summarize, consideration of a family of CCDFs allows a distinction between stochastic  
11 uncertainty that controls the shape of a single CCDF and subjective uncertainty that results in  
12 a distribution of CCDFs. The stepwise shape of a single CCDF reflects aggregation of future  
13 events into similar groups. A family of CCDFs arises from imperfect knowledge of  
14 quantifiable properties, or, in other words, subjective uncertainty. The distribution arising  
15 from subjective uncertainty involves an infinite number of CCDFs; a family of CCDFs is a  
16 sample of finite size.

### 17 18 **6.1.3 Regulatory Criteria for the Quantification of Risk**

19  
20 The representation for risk in Equation 2 provides a conceptual basis for the calculation of the  
21 CCDF for normalized releases specified in 40 CFR § 194.34(a). Further, this representation  
22 provides a structure that can be used for both the incorporation of uncertainties and the  
23 representation of the effects of uncertainties, as stated in 40 CFR § 194.34.

24  
25 In 40 CFR § 194.34(b), the EPA states that “probability distributions for uncertain disposal  
26 system parameter values used in performance assessments shall be developed and  
27 documented in any compliance application.” The treatment of uncertain parameter values in  
28 the performance assessment is discussed in Sections 6.1.4, 6.1.5, and 6.4. Further discussion  
29 of distributions assigned to uncertain parameter values is provided in Appendix PAR (Section  
30 PAR.2).

31  
32 In 40 CFR § 194.34(c), the EPA states that documentation shall be provided of the  
33 computational techniques used to generate random samples. The sampling techniques used  
34 are discussed in Section 6.1.5.2. Sampled values are reproduced in tabular form in Appendix  
35 IRES (Section IRES.1).

36  
37 In 40 CFR § 194.34(d), the EPA states that “the number of CCDFs generated shall be large  
38 enough such that, at cumulative releases of 1 and 10, the maximum CCDF generated exceeds  
39 the 99th percentile of the population of CCDFs with at least a 0.95 probability.” The CCDFs  
40 resulting from this performance assessment are provided in Section 6.5, together with a  
41 demonstration that the total number of CCDFs is sufficiently large.

42  
43 In 40 CFR § 194.34(e), the EPA states that “any compliance application shall display the full  
44 range of CCDFs generated.” The full range of CCDFs generated is displayed in Section 6.5.

1 In 40 CFR § 194.34(f), the EPA states that “any compliance application shall provide  
2 information which demonstrates that there is at least a 95 percent level of confidence that the  
3 mean of the population of CCDFs meets the containment requirements . . . .” Section 6.5  
4 contains a display of the mean CCDF and evidence demonstrating level of confidence.  
5

#### 6 **6.1.4 Calculation of Risk**

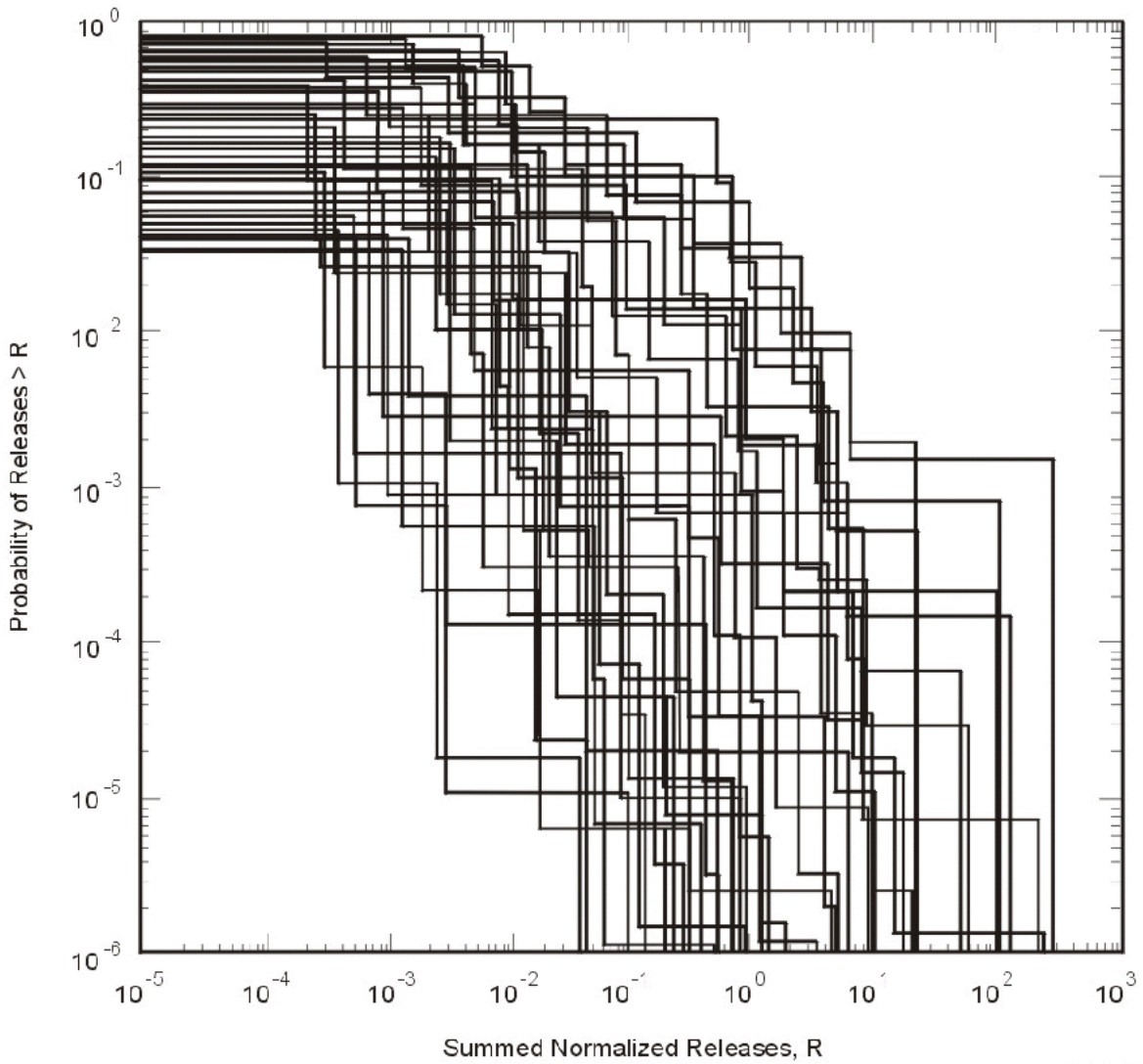
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8 The methodology presented in Sections 6.1.1 and 6.1.2 is based on the work of Kaplan and  
9 Garrick (1981) and is one way to estimate the effects of uncertain but characterizable futures.  
10 In Kaplan and Garrick’s procedure, the possible futures are defined as literal entities ( $S_i$ ), and  
11 each is associated with a probability of occurrence ( $pS_i$ ) and a consequence of occurrence  
12 ( $cS_i$ ). Preliminary performance assessments of the WIPP have used this procedure (for  
13 example, see Sandia National Laboratories 1991; 1992-1993, Vol. 1, Section 4), but definition  
14 of the futures  $S_i$  as discrete entities resulted in a great number of possible futures to be  
15 defined. The method of analysis used in preliminary performance assessments was called  
16 importance sampling.  
17

18 For this performance assessment, an alternative method for calculating futures has been used  
19 that is based on developing futures by direct probabilistic sampling of the possible events  
20 leading to uncertain futures rather than a priori definition of possible futures. This  
21 modification from the calculational techniques of previous preliminary performance  
22 assessments is consistent with the fundamental concepts of Kaplan and Garrick and does not  
23 alter the results of the analysis. Both techniques will lead to the same CCDF. Adoption of this  
24 new procedure was prompted by two practical considerations. First, it is difficult to define  
25 futures as literal entities as required by importance sampling and to develop probabilities for  
26 each one. Second, generation of the futures by probabilistic methods allows for greater  
27 resolution in a CCDF, for equal effort, than the importance sampling procedure used in  
28 preliminary performance assessments.  
29

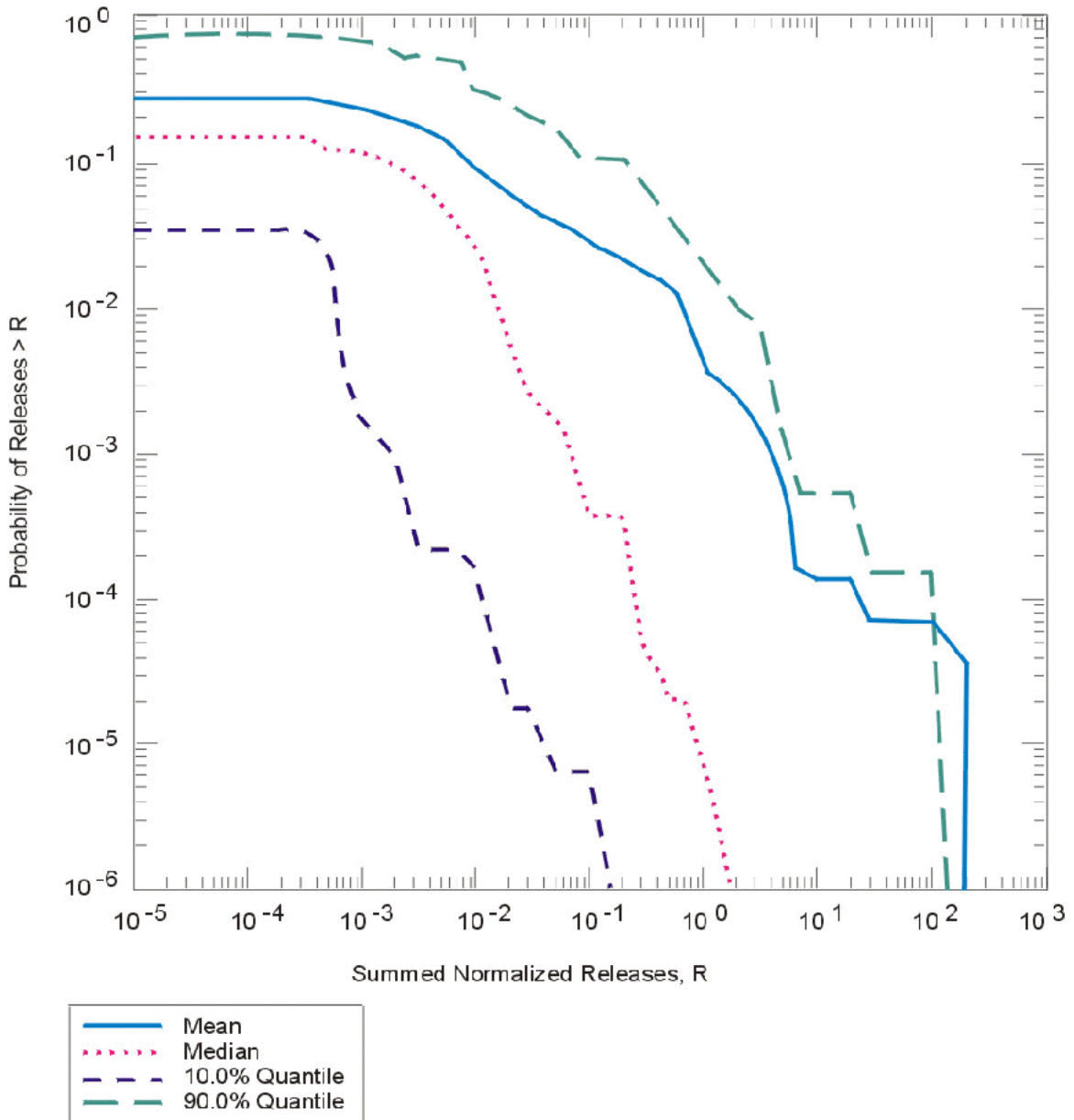
30 The concept of a scenario is important in this performance assessment. There is a universe of  
31 possible futures, which is the set of all possible occurrences within the 10,000-year regulatory  
32 time frame. For analysis, this universe is divided into subsets of occurrences—scenarios—  
33 that are defined practically to include similar future occurrences. It should be noted that  
34 scenarios would not necessarily have to be defined as subsets of similar future occurrences,  
35 but by defining a scenario as a subset of similar futures, the DOE gains a practical advantage





**Figure 6-3. Example Distribution of a Family of CCDFs Obtained by Sampling Imprecisely Known Variables**

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Note: The curves in this figure were obtained by calculating the mean and the indicated percentiles for each consequence value on the abscissa in Figure 6-3. The 90th-percentile curve crosses the mean curve because of highly skewed distributions for exceedance probability. This skew also results in the mean curve being above the median curve.

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Figure 6-4. Example Summary Curves Derived from an Estimated Distribution of CCDFs

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1 because the consequences of futures falling within one scenario can be calculated with the  
2 same model configuration. Because the term scenario is defined simply as a subset of futures  
3 with similar occurrences, any size subset of similar futures can be called a scenario. In  
4 general, applying the term scenario for larger subsets of futures is useful in discussions of  
5 concepts; whereas, applying the term scenario for smaller subsets of futures is useful when  
6 constructing a CCDF.

7  
8 The calculation of the probabilities and consequences of future occurrences begins with the  
9 determination of the sets  $S_i$ , which are the scenarios to be analyzed. Scenarios are determined  
10 through a formal process similar to that proposed by Cranwell et al. (1990, 5 – 10), and the  
11 process used in preliminary performance assessments for the WIPP. This process has four  
12 steps:

- 13 (1) FEPs (features, events, and processes) potentially relevant to the WIPP are identified  
14 and classified.
- 15 (2) Certain FEPs are eliminated according to well-defined screening criteria as not  
16 important or not relevant to the performance of the WIPP.
- 17 (3) Scenarios are formed from the remaining FEPs, in the context of regulatory  
18 performance criteria.
- 19 (4) Scenarios are specified for consequence analysis.

20 Through steps (1) and (2) of the scenario development process, the DOE identifies “all  
21 significant processes and events that may affect the disposal system” as required by 40 CFR  
22 § 191.13(a) and as further addressed in 40 CFR § 194.32. These steps are described in  
23 Section 6.2. The grouping of retained FEPs to form scenarios, and the specification of  
24 scenarios for consequence analysis, is presented in Section 6.3.

25 As discussed in Section 6.2, the DOE has developed a comprehensive initial list of FEPs for  
26 this performance assessment. This comprehensive initial list assures that the identification of  
27 significant processes and events is complete, that potential interactions between FEPs are not  
28 overlooked, and that responses to possible questions are available and well documented.

29 Once scenarios have been defined, a calculational methodology for evaluating their  
30 consequences must be developed. The calculational methodology must address stochastic  
31 uncertainty related to aggregation and stochastic variation, and subjective uncertainty because  
32 of, for example, measurement difficulties or incomplete data. The DOE uses a system of  
33 linked computer models to calculate scenario consequences  $cS_i$ . As discussed in Section 6.4,  
34 these computer models are based on conceptual models that describe the processes relevant to  
35 disposal system performance for the defined scenarios. These conceptual models are in turn  
36 based on site-specific experimental and observational data and the general scientific  
37 understanding of natural and engineered systems.

1 For practical purposes, the DOE separates the calculation of risk because of stochastic  
 2 uncertainty, represented in an individual CCDF, from risk because of subjective uncertainty,  
 3 which is represented by the family of CCDFs. This can be represented mathematically as a  
 4 double integral of a function with the function representing the probability of exceedance  
 5 associated with any particular consequence. The inner integral evaluates stochastic  
 6 uncertainty, or the probability of exceedance associated with any particular consequence; the  
 7 outer integral evaluates subjective uncertainty and leads to a distribution of exceedance  
 8 probabilities for any given consequence value. Because of the complexity of this double  
 9 integral for the WIPP, an analytical method for its solution is not available. Instead, the DOE  
 10 approximates the solution of this double integral with a linked system of computer codes. In  
 11 this computational framework, the performance assessment analysis can be thought of as a  
 12 double sum, presented here in a stylized form for clarity,

(9)

14 Here,  $F(x)$  is a procedure for estimating the normalized release to the accessible environment  
 15 associated with each scenario that could occur at the WIPP site. The inner sum denoted with  
 16 the subscript  $st$  is a probabilistic characterization of the uncertainty associated with  
 17 parameters used to characterize stochastic uncertainty (the  $\mathbf{x}_{st}$  and  $D_{st}$  in equations 4a and 6a,  
 18 respectively). It is the evaluation of  $F(x)$  through the inner sum that develops an individual  
 19 CCDF, as shown in Figure 6-2. The outer sum denoted with the subscript  $su$  is a probabilistic  
 20 characterization of the uncertainty associated with parameters used to characterize subjective  
 21 uncertainty (the  $\mathbf{x}_{su}$  and  $D_{su}$  in Equations 4b and 6b, respectively). It is the combined  
 22 evaluation in the outer sum of the inner sum with  $F(x)$  that develops the family of CCDFs, as  
 23 shown in Figure 6-3.

24  
 25 A separate probabilistic analysis is required to evaluate each sum. Associated with each  
 26 analysis are parameter distributions representing uncertainty (the  $D_{st}$  and  $D_{su}$  of Equations 6a  
 27 and 6b). For example, associated with the inner sum may be uncertainty in the number and  
 28 time of intrusion boreholes. The outer sum includes a probabilistic characterization of site  
 29 properties, such as the permeability of specific rock types.

30  
 31 For the methodology adopted by the DOE for the evaluation of stochastic uncertainty in the  
 32 inner sum, consequence calculations are required for model configurations with a set of fixed  
 33 values for subjective parameters  $\mathbf{x}_{su}$  taken from their distributions  $D_{su}$ , as well as for defined  
 34 sequences and times of events associated with scenarios. These calculations are referred to in  
 35 Section 6.4.11 and later sections as deterministic calculations (or deterministic futures). For  
 36 the evaluation of stochastic uncertainty and construction of a CCDF, the consequences of  
 37 futures generated probabilistically by random sampling (probabilistic futures) are evaluated in  
 38 the context of these deterministic futures. This process is discussed in detail in Sections  
 39 6.4.12 and 6.4.13.

40  
 41 In certain cases, it may not be obvious whether a particular uncertainty should be classified as  
 42 subjective or stochastic. For example, whether currently observed geologic properties persist

1 through time could be thought of as either subjective or stochastic uncertainty. For the WIPP,  
2 the DOE treats uncertainty associated with significant future human actions as stochastic (for  
3 example, drilling for natural resources), and uncertainty in disposal system properties that are  
4 subject to ongoing physical processes as subjective (for example, climate change or gas  
5 generation). In particular, the DOE's formal separation of the evaluation of stochastic  
6 uncertainty from subjective uncertainty into different probabilistic analyses allows clear  
7 understanding as to how any particular uncertainty is incorporated.

8  
9 Once the scenarios have been determined and their consequences calculated using the  
10 appropriate conceptual and computational models, scenario probabilities must be determined  
11 for a CCDF to be constructed. This process is described in Section 6.4.12. CCDF  
12 construction is also described in Section 6.4.13.

### 13 14 **6.1.5 Techniques for Probabilistic Analysis**

15  
16 Once scenarios have been defined, conceptual models defined, and the computational  
17 modeling system developed, the DOE uses probabilistic techniques to evaluate the double sum  
18 presented above. Monte Carlo analysis is the general name for the technique used for  
19 probabilistic analysis of the WIPP. Monte Carlo analyses can involve five steps: (1) selection  
20 of the variables to be examined and the ranges and distributions for their possible values,  
21 (2) generation of the samples to be analyzed, (3) propagation of the samples through the  
22 analysis, (4) uncertainty analysis, and (5) sensitivity analysis. These steps are described  
23 briefly in the following sections.

24  
25 Within the general framework of Monte Carlo analysis, performance assessment uses two  
26 methods for generating the samples propagated through the model system. One method is  
27 used for the assessment of stochastic uncertainty, and another method is used for the  
28 characterization of subjective uncertainty. Each of these methods utilizes the five steps  
29 summarized in the preceding paragraph but differs in methodology in Steps 2 through 5.

#### 30 31 **6.1.5.1 Selection of Variables and Their Ranges and Distributions**

32  
33 Monte Carlo analyses use a probabilistic procedure for the selection of model input.  
34 Therefore, the first step in a Monte Carlo analysis is the selection of uncertain variables and  
35 the assignment of ranges and distributions that characterize them. These variables are  
36 typically input parameters to computer models, and the impact of the assigned ranges and  
37 distributions can be great; for a given set of conceptual and mathematical models,  
38 performance assessment results are largely controlled by the choice of input. Results of  
39 uncertainty and sensitivity analyses, in particular, strongly reflect the characterization of  
40 uncertainty in the input data.

41  
42 Information about the ranges and distributions of possible values can be drawn from a variety  
43 of sources, including field data, laboratory data, and literature. In instances where sufficient  
44 data are not available, the documented solicitation of experts may be used. A review process  
45 leads from the available data to the construction of the distribution functions used in the

1 performance assessment to characterize uncertainty in input parameters. In part, this review  
2 process addresses the scaling of data collected at experimental scales of observation to the  
3 development of the parameter ranges applied to scales of interest in the disposal system.  
4 Because of the nature of the available data and the type of analysis, this review process  
5 unavoidably involves some judgment of the investigators and analysts involved. For this  
6 performance assessment, a discussion of parameter ranges developed by this process is  
7 provided in Appendix PAR (Sections PAR.1, PAR.2, and PAR.3). The QA procedures  
8 associated with this review process are identified in Section 5.1.4 and Appendix PAR (Section  
9 PAR.1).

10  
11 The outcome of the review process is a cumulative distribution function (CDF)  $D(x)$  of the  
12 form shown in Figure 6-5 for each independent variable of interest. For a particular variable  
13  $x_j$ , the function  $D$  is defined such that

$$14 \quad \text{prob}(x < x_j \leq x + \Delta x) = D(x + \Delta x) - D(x) . \quad (10)$$

15  
16 That is,  $D(x + \Delta x) - D(x)$  is equal to the probability that the appropriate value to use for  $x_j$  in the  
17 particular analysis under consideration falls between  $x$  and  $x + \Delta x$ .

#### 18 19 20 6.1.5.2 Generation of the Sample

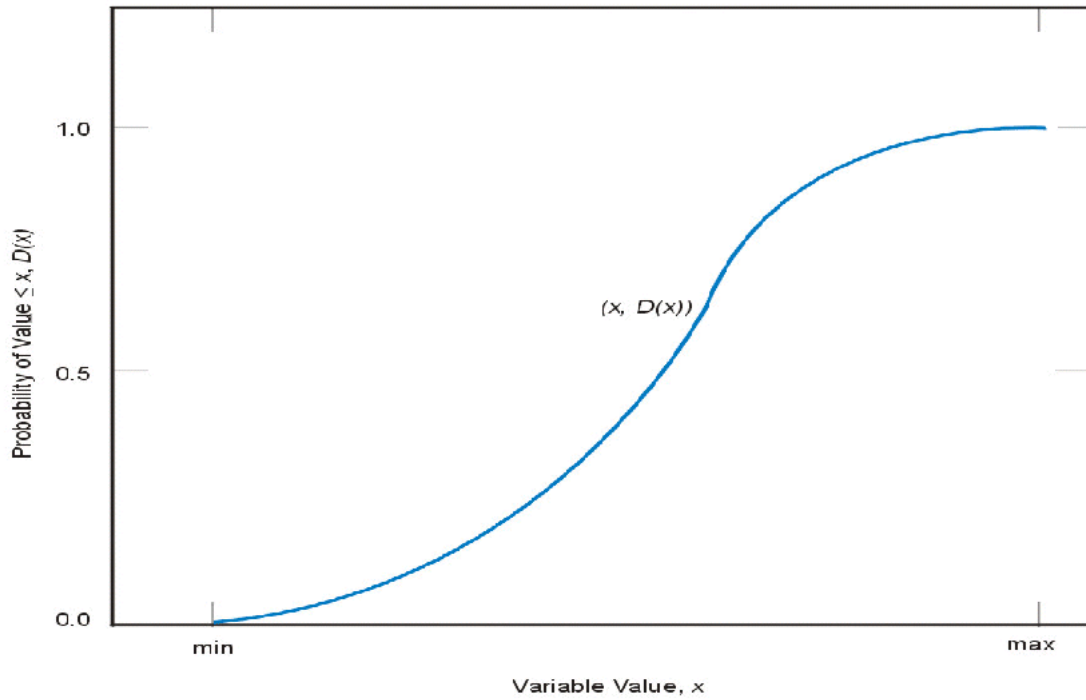
21  
22 Various techniques are available for generating samples from the assigned distribution  
23 functions for the variables, including random sampling, stratified sampling, and Latin  
24 hypercube sampling (LHS). The DOE's performance assessment for WIPP uses random  
25 sampling and LHS.

26  
27 Random sampling of the occurrence of possible future events is used to generate the possible  
28 futures (probabilistic futures) that comprise a CCDF. This sampling is used to select values of  
29 uncertain parameters associated with future human activities, or in other words, it is used to  
30 incorporate stochastic uncertainty into the WIPP performance assessment. This sampling is  
31 used for parameters evaluated in the inner sum of the double sum and included in the  
32 parameter set  $\mathbf{x}_{st}$  with associated distributions  $D_{st}$ , as shown in Equations 4a and 6a,  
33 respectively. Generation of the futures comprising a CCDF by random sampling, rather than  
34 importance or stratified sampling as used in previous preliminary performance assessments,  
35 largely eliminates errors from aggregation.

36  
37 LHS, in which the full range of each variable is subdivided into intervals of equal probability  
38 and samples are drawn from each interval, is used to select values of uncertain parameters  
39 associated with the physical system being simulated. In other words, LHS incorporates  
40 subjective uncertainty into the WIPP performance assessment. This sampling is used for



1



Note: For each value  $x$  on the abscissa, the corresponding value  $D(x)$  on the ordinate is the probability that the appropriate value to use in the analysis is less than or equal to  $x$ .

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**Figure 6-5. Distribution Function for an Imprecisely Known Variable**

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1 parameters that are evaluated in the outer sum of the double sum and are included in the  
2 parameter set  $\mathbf{x}_{su}$  with associated distributions  $D_{su}$ , as shown in Equations 4b and 6b,  
3 respectively. The restricted pairing technique of Iman and Conover (1982, 314 – 319) is used  
4 to prevent spurious correlations within the sample.

#### 6 6.1.5.3 Propagation of the Sample through the Analysis

7  
8 The next step is the propagation of the sample through the analysis. Each element of the  
9 sample is supplied to the model system as input, and the corresponding model system  
10 predictions are saved for use in later uncertainty and sensitivity studies. The Software  
11 Configuration Management System (SCMS) has been developed to facilitate the complex  
12 calculations performed by the model system and to store the input and output files from each  
13 program.

#### 14 15 6.1.5.4 Uncertainty Analysis

16  
17 Uncertainty analyses evaluate uncertainty in performance estimates that results from  
18 uncertainty about imprecisely known input parameters. Once a sample has been generated  
19 and propagated through the modeling system, uncertainty in the outcome can be interpreted  
20 directly from the display of the results. For the WIPP performance assessment, stochastic  
21 uncertainty is represented by the shape of the individual CCDFs displayed in Section 6.5.  
22 Subjective uncertainty is represented by the family of CCDFs displayed in Section 6.5.

#### 23 24 6.1.5.5 Sensitivity Analysis

25  
26 Sensitivity analyses determine the contribution of individual input variables to the uncertainty  
27 in model predictions. This is the final step in a probabilistic study. Sensitivity analyses can  
28 identify those parameters for which reductions in uncertainty (that is, narrowing of the range  
29 of values from which the sample used in the Monte Carlo analysis is drawn) have the greatest  
30 potential to increase confidence in the estimate of the disposal system's performance.  
31 However, because results of these analyses are inherently conditional on the models, data  
32 distributions, and techniques used to generate them, the analyses cannot provide insight to the  
33 correctness of the conceptual models and data distributions used. Qualitative judgment about  
34 the modeling system must be used with sensitivity analyses to set priorities for performance  
35 assessment data acquisition and model development. Sensitivity analyses conducted as part of  
36 the WIPP performance assessment are described in Appendix SA.

## 37 38 **6.2 Identification and Screening of Features, Events, and Processes**

39  
40 The EPA has provided criteria concerning the scope of performance assessments in  
41 40 CFR § 194.32. In particular, criteria relating to the identification of potential processes  
42 and events that may affect the performance of the disposal system are provided in  
43 40 CFR § 194.32(e), which states that

44  
45 Any compliance application(s) shall include information which:

1  
2 (1) Identifies all potential processes, events or sequences and combinations of processes and  
3 events that may occur during the regulatory time frame and may affect the disposal system;  
4

5 (2) Identifies the processes, events or sequences and combinations of processes and events  
6 included in performance assessments; and  
7

8 (3) Documents why any processes, events or sequences and combinations of processes and  
9 events identified pursuant to paragraph (e)(1) of this section were not included in performance  
10 assessment results provided in any compliance application.  
11

12 This section and Appendix SCR fulfill these criteria by documenting DOE's identification,  
13 screening, and screening results of all potential processes and events consistent with the  
14 criteria specified in 40 CFR § 194.32(e).  
15

16 As discussed in Section 6.1.4, the first two steps in scenario development involve the  
17 identification and screening of FEPs (features, events, and processes) potentially relevant to  
18 the performance of the disposal system. This section contains a discussion of the  
19 development of a comprehensive initial set of FEPs, the methodology and criteria used for  
20 screening, and a summary of the FEPs retained for scenario development. Detailed discussion  
21 of the basis for eliminating or retaining particular FEPs is provided in Appendix SCR. The  
22 formation of scenarios from retained FEPs is discussed in Section 6.3, and the specification of  
23 scenarios for consequence analysis is addressed in Section 6.4.12.  
24

### 25 **6.2.1 Identification of FEPs**

26  
27 The first step of the scenario development procedure is identification and classification of  
28 FEPs potentially relevant to the performance of the disposal system. Catalogs of FEPs have  
29 been developed in several national radioactive waste disposal programs as well as  
30 internationally. In constructing a comprehensive list of FEPs for the WIPP, the DOE drew on  
31 the work of these other radioactive waste disposal programs.  
32

33 As a starting point, the DOE assembled a list of potentially relevant FEPs from the  
34 compilation developed by Stenhouse et al. (1993) for the Swedish Nuclear Power Inspectorate  
35 *Statens Kärnkraftinspektion* (SKI). The SKI list was based on a series of FEP lists developed  
36 for other disposal programs and is considered to be the best documented and most  
37 comprehensive starting point for the WIPP. For the SKI study, an initial raw FEP list was  
38 compiled based on nine different FEP identification studies (Table 6-2).  
39

40 The compilers of the SKI list eliminated a number of FEPs as irrelevant to the particular  
41 disposal concept under consideration in Sweden; these FEPs were reinstated for the WIPP  
42 effort, and several FEPs on the SKI list were subdivided to facilitate screening for the WIPP.  
43 Finally, to ensure comprehensiveness, other FEPs specific to the WIPP were added based on  
44 review of key project documents and broad examination of the preliminary WIPP list by both  
45 project participants and stakeholders. The initial unedited list is contained in Attachment 1 of

Table 6-2. FEP Identification Studies Used in the SKI Study

Study	Country	Number of FEPS Identified
Atomic Energy of Canada Limited (AECL) study of disposal of spent fuel in crystalline rock (Goodwin et al. 1994)	Canada	275
SKI & Swedish Nuclear Fuel and Waste Management Company (SKB) study of disposal of spent fuel in crystalline rock (Andersson 1989)	Sweden	157
National Cooperative for the Storage of Radioactive Waste (NAGRA) Project Gewähr study (NAGRA 1985)	Switzerland	44
UK Department of the Environment Dry Run 3 study of deep disposal of low- and intermediate-level waste (L/ILW) (Thorne 1992)	United Kingdom	305
UK Department of Environment assessment of L/ILW disposal in volcanic rock at Sellafield (Miller and Chapman 1992)	United Kingdom	79
UK Nuclear Industry Radioactive Waste Executive (NIREX) study of the deep disposal of L/ILW (Hodgkinson and Sumerling 1989)	United Kingdom	131
SNL study of deep disposal of spent fuel (Cranwell et al. 1990)	United States	29
NEA Working Group on Systematic Approaches to Scenario Development (OECD 1992)	International	122
International Atomic Energy Agency (IAEA) Safety Series (IAEA 1981)	International	56

Appendix SCR. The initial unedited FEP list was restructured and revised to derive the comprehensive WIPP FEP list used in this application. The number of FEPs has been reduced to approximately 240 for this application to avoid the ambiguities caused by the use of a generic list. Restructuring the list for this application did not remove any substantive issues from the discussion. As discussed in more detail in Attachment 1 to Appendix SCR, the following steps have been used to derive the WIPP FEP list used in this application from the initial unedited list.

- References to subsystems have been eliminated because the SKI subsystem classification is not appropriate for the WIPP disposal concept. For example, in contrast to the Swedish disposal concept, canister integrity does not have a role in postoperational performance of the WIPP, and the terms near-field, far-field, and biosphere are not unequivocally defined for the WIPP site.
- Duplicate FEPs have been eliminated. Duplicate FEPs arose in the SKI list because individual FEPs could act in different subsystems. FEPs have a single entry in this application list whether they are applicable to several parts of the disposal system or to a single part only. For example, the FEP *Gas Effects: Disruption* appears in the seals,

1 backfill, waste, canister, and near-field subsystems in the initial FEP list. These FEPs  
2 are represented by the single FEP *Disruption Due to Gas Effects* for this application.

- 3
- 4 • FEPs that are not relevant to the WIPP design or inventory have been eliminated.  
5 Examples include FEPs related to high-level waste, copper canisters, and bentonite  
6 backfill.
- 7
- 8 • FEPs relating to engineering design changes have been eliminated because they are  
9 not relevant to a compliance application based on the DOE's design for the WIPP.  
10 Examples of such FEPs are *Design Modifications: Canister* and *Design Modification:*  
11 *Geometry*.
- 12
- 13 • FEPs relating to constructional, operational, and decommissioning errors have been  
14 eliminated. The DOE has administrative and quality control procedures to ensure that  
15 the facility will be constructed, operated, and decommissioned properly.
- 16
- 17 • Detailed FEPs relating to processes in the surface environment have been aggregated  
18 into a small number of generalized FEPs. For example, the SKI list includes the  
19 biosphere FEPs *Inhalation of Salt Particles, Smoking, Showers and Humidifiers,*  
20 *Inhalation and Biotic Material, Household Dust and Fumes, Deposition (wet and*  
21 *dry), Inhalation and Soils and Sediments, Inhalation and Gases and Vapors (indoor*  
22 *and outdoor), and Suspension in Air,* which are represented by the FEP *Inhalation* in  
23 this application.
- 24
- 25 • FEPs relating to the containment of hazardous metals, volatile organic compounds  
26 (VOCs), and other chemicals that are not regulated by 40 CFR Part 191 are not  
27 included.
- 28
- 29 • A few FEPs have been renamed to be consistent with terms used to describe specific  
30 WIPP processes (for example, *Wicking, Brine Inflow*).
- 31

## 32 **6.2.2 Criteria for Screening of FEPs and Categorization of Retained FEPs**

33  
34 The purpose of FEP screening is to identify those FEPs that should be accounted for in  
35 performance assessment calculations, and those FEPs that need not be considered further.  
36 The DOE's process of removing FEPs from consideration in performance assessment  
37 calculations involved the structured application of explicit screening criteria. The criteria  
38 used to screen out FEPs are explicit regulatory exclusions (SO-R), probability (SO-P), or  
39 consequence (SO-C). As discussed in Section 6.2.2.1, all three criteria are derived from  
40 regulatory requirements. FEPs not screened as SO-R, SO-P, or SO-C have been retained for  
41 inclusion in performance assessment calculations and are classified as undisturbed  
42 performance (UP) or disturbed performance (DP) FEPs. These screening criteria and FEP  
43 classifiers are discussed in this section, and FEP screening is discussed in Sections 6.2.3, 6.2.4,  
44 and 6.2.5.

1 6.2.2.1 Elimination of FEPs Based on Regulation (SO-R), Probability (SO-P), or  
2 Consequence (SO-C)  
3

4 *Regulation (SO-R)*. Specific FEP screening criteria are stated in 40 CFR Part 191 and 40  
5 CFR Part 194. These screening criteria relating to the applicability of particular FEPs  
6 represent screening decisions made by the EPA. That is, in the process of developing and  
7 demonstrating the feasibility of the 40 CFR Part 191 standard and the 40 CFR Part 194  
8 criteria, the EPA considered and made conclusions on the relevance, consequence, and/or  
9 probability of occurrence of particular FEPs and, in so doing, allowed for some FEPs to be  
10 eliminated from consideration. Section 6.2.5 describes the regulatory screening criteria that  
11 pertain to limitations on the type of human-initiated events and processes that need be  
12 analyzed.

13  
14 *Probability of occurrence of a FEP leading to significant release of radionuclides (SO-P)*.  
15 Low-probability events can be excluded on the basis of the criterion provided in 40 CFR  
16 § 194.32(d), which states that “performance assessments need not consider processes and  
17 events that have less than one chance in 10,000 of occurring over 10,000 years.” In practice,  
18 for most FEPs screened out on the basis of low probability of occurrence, it has not been  
19 possible to estimate a meaningful quantitative probability. In the absence of quantitative  
20 probability estimates, a qualitative argument has been provided.

21  
22 *Potential consequences associated with the occurrence of the FEPs (SO-C)*. The DOE  
23 recognizes two uses for this criterion:  
24

- 25 (1) FEPs can be eliminated from performance assessment calculations on the basis of  
26 insignificant consequence. Consequence can refer to effects on the repository or  
27 site or to radiological consequence. In particular, 40 CFR § 194.34(a) states that  
28 “The results of performance assessments shall be assembled into “complementary,  
29 cumulative distribution functions” (CCDFs) that represent the probability of  
30 exceeding various levels of cumulative release caused by all *significant* processes  
31 and events.” (emphasis added). The DOE has omitted events and processes from  
32 performance assessment calculations where there is a reasonable expectation that  
33 the remaining probability distribution of cumulative releases would not be  
34 significantly changed by such omissions.  
35
- 36 (2) FEPs that are potentially beneficial to subsystem performance may be eliminated  
37 from performance assessment calculations if necessary to simplify the analysis. This  
38 argument may be used when there is uncertainty as to exactly how the FEP should  
39 be incorporated into assessment calculations or when incorporation would incur  
40 unreasonable difficulties.  
41

42 In some cases the effects of the occurrence of a particular event or process, although not  
43 necessarily insignificant, can be shown to lie within the range of uncertainty of another FEP  
44 already accounted for in the performance assessment calculations. In such cases the event or

1 process may be considered to be included in performance assessment calculations implicitly,  
2 within the range of uncertainty associated with the included FEP.

3  
4 The distinctions between the SO-R, SO-P, and SO-C screening classifications are summarized  
5 in Figure 6-6. Although some FEPs could be eliminated from performance assessment  
6 calculations on the basis of more than one criterion, the most practical screening criterion was  
7 used for classification. In particular, a regulatory screening classification was used in  
8 preference to a probability or consequence screening classification, as illustrated in Figure 6-  
9 6. FEPs that have not been screened out based on any one of the three criteria are included in  
10 the performance assessment.

#### 11 12 6.2.2.2 Undisturbed Performance (UP) FEPs

13  
14 FEPs classified as UP are accounted for in calculations of undisturbed performance of the  
15 disposal system. Undisturbed performance is defined in 40 CFR § 191.12 as “the predicted  
16 behavior of a disposal system, including consideration of the uncertainties in predicted  
17 behavior, if the disposal system is not disrupted by human intrusion or the occurrence of  
18 unlikely natural events.” The UP FEPs are accounted for in the performance assessment  
19 calculations to evaluate compliance with the Containment Requirements in 40 CFR § 191.13.

#### 20 21 6.2.2.3 Disturbed Performance (DP) FEPs

22  
23 FEPs classified as DP are accounted for only in assessment calculations for disturbed  
24 performance. As described in Appendix SCR (Sections SCR.3.1.3.2 and SCR.4), the DP  
25 FEPs that remain following the screening process relate to the potential disruptive effects of  
26 future drilling and mining events in the controlled area. Consideration of both DP and UP  
27 FEPs is required to evaluate compliance with 40 CFR § 191.13.

28  
29 In the following sections, FEPs are discussed under the categories Natural FEPs, Waste- and  
30 Repository-Induced FEPs, and Human-Initiated Events and Processes (EPs).

31  
32 This also allows an evaluation of compliance with the individual dose criterion in 40 CFR  
33 § 191.15 and the groundwater protection requirements in 40 CFR § 191.24 (see Chapter 8.0).

### 34 35 **6.2.3 Natural FEPs**

36  
37 This subsection briefly discusses natural FEPs that have the potential to affect long-term  
38 performance of the WIPP disposal system. These FEPs and their screening classifications are  
39 listed in Table 6-3; the DOE’s detailed screening arguments for natural FEPs are contained in  
40 Appendix SCR (Section SCR.1). This screening of natural FEPs fulfills, in conjunction with  
41 the performance assessment calculations, the criterion of the Future States Assumptions in



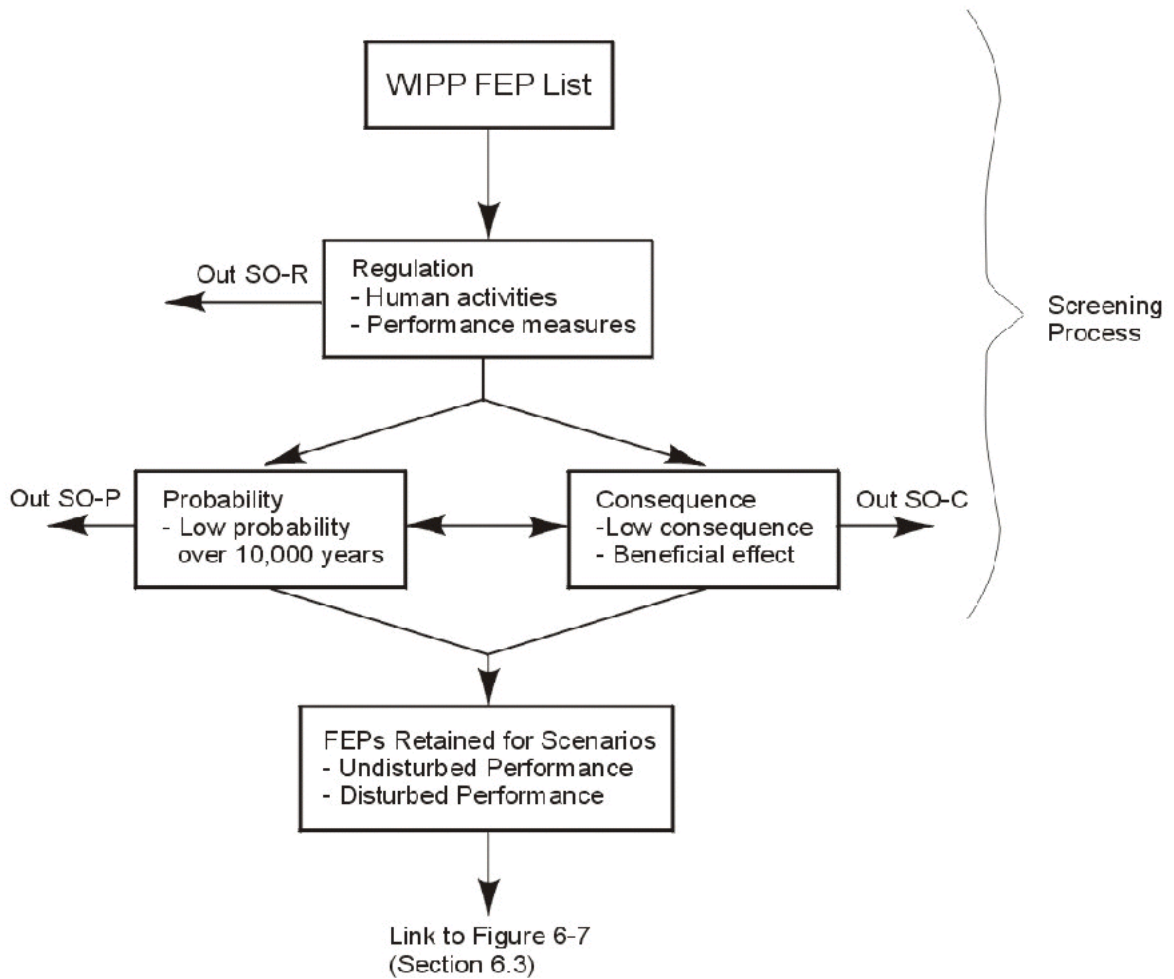


Figure 6-6. Screening Process Based on Screening Classifications

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Table 6-3. Natural FEPs and Their Screening Classifications

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
<b>GEOLOGICAL FEPS</b>			SCR.1.1
Stratigraphy			SCR.1.1.1
Stratigraphy	UP		
Brine reservoirs	DP		
Tectonics			SCR.1.1.2
Changes in regional stress	SO-C		
Regional tectonics	SO-C		
Regional uplift and subsidence	SO-C		
Structural FEPs			SCR.1.1.3
Deformation			SCR.1.1.3.1
Salt deformation	SO-P	UP near repository.	
Diapirism	SO-P		
Fracture development			SCR.1.1.3.2
Formation of fractures	SO-P	UP near repository.	
Changes in fracture properties	SO-C	UP near repository.	
Fault movement			SCR.1.1.3.3
Formation of new faults	SO-P		
Fault movement	SO-P		
Seismic activity			SCR.1.1.3.4
Seismic activity	UP		
Crustal processes			SCR.1.1.4
Igneous activity			SCR.1.1.4.1
Volcanic activity	SO-P		
Magmatic activity	SO-C		
Metamorphism			SCR.1.1.4.2
Metamorphic activity	SO-P		
Geochemical FEPs			SCR.1.1.5
Dissolution			SCR.1.1.5.1
Shallow dissolution	UP		
Lateral dissolution	SO-C		
Deep dissolution	SO-P		
Solution chimneys	SO-P		
Breccia pipes	SO-P		
Collapse breccias	SO-P		
Mineralization			SCR.1.1.5.2
Fracture infills	SO-C		
<b>SUBSURFACE HYDROLOGICAL FEPS</b>			SCR.1.2
Groundwater characteristics			SCR.1.2.1
Saturated groundwater flow	UP		
Unsaturated groundwater flow	UP	SO-C in Culebra.	
Fracture flow	UP		
Density effects on groundwater flow	SO-C		
Effects of preferential pathways	UP	UP in Salado and Culebra.	

**Table 6-3. Natural FEPs and Their Screening Classifications (Continued)**

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
Changes in groundwater flow			SCR.1.2.2
Thermal effects on groundwater flow	SO-C		
Saline intrusion	SO-P		
Freshwater intrusion	SO-P		
Hydrological response to earthquakes	SO-C		
Natural gas intrusion	SO-P		
<b>SUBSURFACE GEOCHEMICAL FEPS</b>			SCR.1.3
Groundwater geochemistry			SCR.1.3.1
Groundwater geochemistry	UP		
Changes in groundwater chemistry			SCR.1.3.2
Saline intrusion	SO-C		
Freshwater intrusion	SO-C		
Changes in groundwater Eh	SO-C		
Changes in groundwater pH	SO-C		
Effects of dissolution	SO-C		
<b>GEOMORPHOLOGICAL FEPS</b>			SCR.1.4
Physiography			SCR.1.4.1
Physiography	UP		
Meteorite impact			SCR.1.4.2
Impact of a large meteorite	SO-P		
Denudation			SCR.1.4.3
Weathering			SCR.1.4.3.1
Mechanical weathering	SO-C		
Chemical weathering	SO-C		
Erosion			SCR.1.4.3.2
Aeolian erosion	SO-C		
Fluvial erosion	SO-C		
Mass wasting	SO-C		
Sedimentation			SCR.1.4.3.3
Aeolian deposition	SO-C		
Fluvial deposition	SO-C		
Lacustrine deposition	SO-C		
Mass wasting	SO-C		
Soil development			SCR.1.4.4
Soil development	SO-C		
<b>SURFACE HYDROLOGICAL FEPS</b>			SCR.1.5
Fluvial			SCR.1.5.1
Stream and river flow	SO-C		
Lacustrine			SCR.1.5.2
Surface water bodies	SO-C		
Groundwater recharge and discharge			SCR.1.5.3
Groundwater discharge	UP		

**Table 6-3. Natural FEPs and Their Screening Classifications (Continued)**

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
Groundwater recharge	UP		
Infiltration	UP	UP for climate change effects.	
Changes in surface hydrology			SCR.1.5.4
Changes in groundwater recharge and discharge	UP		
Lake formation	SO-C		
River flooding	SO-C		
<b>CLIMATIC FEPS</b>			SCR.1.6
Climate			SCR.1.6.1
Precipitation (for example, rainfall)	UP		
Temperature	UP		
Climate change			SCR.1.6.2
Meteorological			SCR.1.6.2.1
Climate change	UP		
Glaciation			SCR.1.6.2.2
Glaciation	SO-P		
Permafrost	SO-P		
<b>MARINE FEPS</b>			SCR.1.7
Seas			SCR.1.7.1
Seas and oceans	SO-C		
Estuaries	SO-C		
Marine sedimentology			SCR.1.7.2
Coastal erosion	SO-C		
Marine sediment transport and deposition	SO-C		
Sea level changes			
Sea level changes	SO-C		SCR.1.7.3
<b>ECOLOGICAL FEPS</b>			SCR.1.8
Flora & fauna			SCR.1.8.1
Plants	SO-C		
Animals	SO-C		
Microbes	SO-C	UP for colloidal effects and gas generation	

**Table 6-3. Natural FEPs and Their Screening Classifications (Continued)**

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
Changes in flora & fauna Natural ecological development	SO-C		SCR.1.8.2

**Legend:**

- UP FEPs accounted for in the assessment calculations for undisturbed performance for 40 CFR § 191.13 (as well as 40 CFR § 191.15 and Subpart C of 40 CFR Part 191).
- DP FEPs accounted for (in addition to all UP FEPs) in the assessment calculations for disturbed performance for 40 CFR § 191.13.
- SO-R FEPs eliminated from performance assessment calculations on the basis of regulations provided in 40 CFR Part 191 and criteria provided in 40 CFR Part 194.
- SO-C FEPs eliminated from performance assessment (and compliance assessment) calculations on the basis of consequence.
- SO-P FEPs eliminated from performance assessment (and compliance assessment) calculations on the basis of low probability of occurrence.

40 CFR § 194.25(b) that the DOE shall “document in any compliance application, to the extent practicable, effects of potential future hydrogeologic, geologic and climatic conditions on the disposal system over the regulatory time frame.”

Consistent with 40 CFR § 194.32(d), the DOE has screened out several natural FEPs from performance assessment calculations on the basis of a low probability of occurrence at or near the WIPP site. In particular, natural events for which there is no evidence indicating that they have occurred within the Delaware Basin have been screened on this basis. In this analysis, the probabilities of occurrence of these events are assumed to be zero. Quantitative, nonzero probabilities for such events, based on numbers of occurrences, cannot be ascribed without considering regions much larger than the Delaware Basin, thus neglecting established geological understanding of the events and processes that occur within particular geographical provinces. No disruptive natural FEPs are likely to occur during the regulatory time frame that could result in the creation of new pathways or significant alteration of existing pathways.

In considering the overall geological setting of the Delaware Basin, the DOE has eliminated many FEPs from performance assessment calculations on the basis of low consequence. Events and processes that have had little effect on the characteristics of the region in the past are expected to be of low consequence for the regulatory time period.

**6.2.4 Waste- and Repository-Induced FEPs**

The waste- and repository-induced FEPs are those that relate specifically to the waste material, waste containers, shaft seals, MgO backfill, panel closures, repository structures, and investigation boreholes. All FEPs related to radionuclide chemistry and radionuclide migration are included in this category. FEPs related to radionuclide transport resulting from future borehole intersections of the WIPP excavation are defined as waste- and repository-

1 induced FEPs. Waste- and repository-induced FEPs and their screening classification are  
2 listed in Table 6-4. The DOE's detailed screening discussions for these FEPs are contained in  
3 Appendix SCR (Section SCR.2).  
4

5 The DOE has screened out many FEPs in this category on the basis of low consequence to the  
6 performance of the disposal system. For example, the DOE has shown that the heat generated  
7 by radioactive decay of the emplaced RH- and CH-TRU waste will not result in temperature  
8 increases sufficient to induce significant thermal convection, thermal stresses and strains, or  
9 thermally induced chemical perturbations within the disposal system (see Appendix SCR,  
10 Sections SCR.2.2.2 and SCR.2.5.7). Also, hydration of the emplaced concrete seals and  
11 chemical conditioner will be exothermic, but the DOE has shown that the heat generated will  
12 not have a significant effect on the performance of the disposal system (see Appendix SCR,  
13 Section SCR.2.5.7).  
14

15 Other waste- and repository-induced FEPs have been eliminated from performance  
16 assessment calculations on the basis of beneficial effect to the performance of the disposal  
17 system, if necessary to simplify the analysis.  
18

19 Waste- and repository-induced FEPs eliminated on the basis of low probability of occurrence  
20 over 10,000 years are generally those for which no mechanisms have been identified that  
21 could result in their occurrence within the disposal system. Such FEPs include explosions  
22 resulting from nuclear criticality, and the development of large-scale reduction-oxidation  
23 fronts.  
24

## 25 **6.2.5 Human-Initiated Events and Processes**

26  
27 Assessments of compliance with the Containment Requirements in 40 CFR § 191.13 require  
28 consideration of "all significant processes and events" including human-initiated EPs. These  
29 EPs and their screening classifications are listed in Table 6-5. The DOE's detailed screening  
30 arguments for human-initiated EPs are presented in Appendix SCR (Section SCR.3).  
31

32 The scope of performance assessments is clarified with respect to human-initiated events and  
33 processes in 40 CFR § 194.32. At 40 CFR § 194.32(a) the EPA states that  
34

35 Performance assessments shall consider natural processes and events, mining, deep drilling, and  
36 shallow drilling that may affect the disposal system during the regulatory time frame.  
37

38 Thus, performance assessments must include consideration of human-initiated EPs relating to  
39 mining and drilling activities that might take place during the regulatory time frame. In  
40 particular, performance assessments must consider the potential effects of such activities that  
41 might take place within the controlled area at a time when institutional controls cannot be  
42 assumed to completely eliminate the possibility of human intrusion.  
43

**Table 6-4. Waste- and Repository-Induced FEPs and Their Screening Classifications**

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
<b>WASTE AND REPOSITORY CHARACTERISTICS</b>			
Repository characteristics			
Disposal geometry	UP		SCR.2.1.1
Waste characteristics			
Waste inventory	UP		SCR.2.1.2
Heterogeneity of waste forms	DP		
Container characteristics			
Container form	SO-C		SCR.2.1.3
Container material inventory	UP		
Seal characteristics			
Seal geometry	UP		SCR.2.1.4
Seal physical properties	UP		
Seal chemical composition	SO-C	Beneficial SO-C	
Backfill characteristics			
Backfill physical properties	SO-C		SCR.2.1.5
Backfill chemical composition	UP		
Postclosure monitoring			
Postclosure monitoring	SO-C		SCR.2.1.6
<b>RADIOLOGICAL FEPS</b>			
Radioactive decay			
Radionuclide decay and ingrowth	UP		SCR.2.2.1
Heat from radioactive decay			
Heat from radioactive decay	SO-C		SCR.2.2.2
Nuclear criticality			
Nuclear criticality: heat	SO-P		SCR.2.2.3
Radiological effects on material properties			
Radiological effects on waste	SO-C		SCR.2.2.4
Radiological effects on containers	SO-C		
Radiological effects on seals	SO-C		
<b>GEOLOGICAL AND MECHANICAL FEPS</b>			
Excavation-induced fracturing			
Disturbed rock zone	UP		SCR.2.3.1
Excavation-induced changes in stress	UP		
Rock creep			
Salt creep	UP		SCR.2.3.2
Changes in the stress field	UP		
Roof falls			
Roof falls	UP		SCR.2.3.3
Subsidence			
Subsidence	SO-C		SCR.2.3.4
Large scale rock fracturing	SO-P		



**Table 6-4. Waste- and Repository-Induced FEPs and Their Screening Classifications (Continued)**

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
Effects of fluid pressure changes			SCR.2.3.5
Disruption due to gas effects	UP		
Pressurization	UP		
Effects of explosions			SCR.2.3.6
Gas explosions	UP		
Nuclear explosions	SO-P		
Thermal effects			SCR.2.3.7
Thermal effects on material properties	SO-C		
Thermally-induced stress changes	SO-C		
Differing thermal expansion of repository components	SO-C		
Mechanical effects on material properties			SCR.2.3.8
Consolidation of waste	UP		
Movement of containers	SO-C		
Container integrity	SO-C	Beneficial SO-C	
Mechanical effects of backfill	SO-C		
Consolidation of seals	UP		
Mechanical degradation of seals	UP		
Investigation boreholes	SO-C		
Underground boreholes	UP		
SUBSURFACE HYDROLOGICAL AND FLUID DYNAMICAL FEPS			SCR.2.4
Repository-induced flow			SCR.2.4.1
Brine inflow	UP		
Wicking	UP		
Effects of gas generation			SCR.2.4.2
Fluid flow due to gas production	UP		
Thermal effects			SCR.2.4.3
Convection	SO-C		
GEOCHEMICAL AND CHEMICAL FEPS			SCR.2.5
Gas generation			SCR.2.5.1
Microbial gas generation			SCR.2.5.1.1
Degradation of organic material	UP		
Effects of temperature on microbial gas generation	UP		
Effects of pressure on microbial gas generation	SO-C		
Effects of radiation on microbial gas generation	SO-C		
Effects of biofilms on microbial gas generation	UP		

**Table 6-4. Waste- and Repository-Induced FEPs and Their Screening Classifications (Continued)**

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
Corrosion			SCR.2.5.1.2
Gases from metal corrosion	UP		
Galvanic coupling	SO-P		
Chemical effects of corrosion	UP		
Radiolytic gas generation			SCR.2.5.1.3
Radiolysis of brine	SO-C		
Radiolysis of cellulose	SO-C		
Helium gas production	SO-C		
Radioactive gases	SO-C		
Chemical speciation			SCR.2.5.2
Speciation	UP	UP in disposal rooms and Culebra. SO-C elsewhere, and beneficial SO-C in cementitious seals.	
Kinetics of speciation	SO-C		
Precipitation and dissolution			SCR.2.5.3
Dissolution of waste	UP		
Precipitation	SO-C	Beneficial SO-C	
Kinetics of precipitation and dissolution	SO-C	Kinetics of waste dissolution is a beneficial SO-C	
Sorption			SCR.2.5.4
Actinide sorption	UP	UP in the Culebra and Dewey Lake. Beneficial SO-C elsewhere	
Kinetics of sorption	UP		
Changes in sorptive surfaces	UP		
Reduction-oxidation chemistry			SCR.2.5.5
Effect of metal corrosion	UP		
Reduction-oxidation fronts	SO-P		
Reduction-oxidation kinetics	UP		
Localized reducing zones	SO-C		
Organic complexation			SCR.2.5.6
Organic complexation	SO-C		
Organic ligands	SO-C		
Humic and fulvic acids	UP		
Kinetics of organic complexation	SO-C		
Exothermic reactions			SCR.2.5.7
Exothermic reactions	SO-C		
Concrete hydration	SO-C		
Chemical effects on material properties			SCR.2.5.8
Chemical degradation of seals	UP		
Chemical degradation of backfill	SO-C		

**Table 6-4. Waste- and Repository-Induced FEPs and Their Screening Classifications (Continued)**

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
Microbial growth on concrete	UP		
CONTAMINANT TRANSPORT MODE FEPS			SCR.2.6
Solute transport			SCR.2.6.1
Solute transport	UP		
Colloid transport			SCR.2.6.2
Colloid transport	UP		
Colloid formation and stability	UP		
Colloid filtration	UP		
Colloid sorption	UP		
Particulate transport			SCR.2.6.3
Suspensions of particles	DP	SO-C for undisturbed conditions	
Rinse	SO-C		
Cuttings	DP	Repository intrusion only	
Cavings	DP	Repository intrusion only	
Spallings	DP	Repository intrusion only	
Microbial transport			SCR.2.6.4
Microbial transport	UP		
Biofilms	SO-C	Beneficial SO-C	
Gas transport			SCR.2.6.5
Transport of radioactive gases	SO-C		
CONTAMINANT TRANSPORT PROCESSES			SCR.2.7
Advection			SCR.2.7.1
Advection	UP		
Diffusion			SCR.2.7.2
Diffusion	UP		
Matrix diffusion	UP		
Thermochemical transport phenomena			SCR.2.7.3
Soret effect	SO-C		
Electrochemical transport phenomena			SCR.2.7.4
Electrochemical effects	SO-C		
Galvanic coupling	SO-P		
Electrophoresis	SO-C		
Physicochemical transport phenomena			SCR.2.7.5
Chemical gradients	SO-C		
Osmotic processes	SO-C	Beneficial SO-C	
Alpha recoil	SO-C		
Enhanced diffusion	SO-C		

**Table 6-4. Waste- and Repository-Induced FEPs and Their Screening Classifications (Continued)**

**Title 40 CFR Part 191 Compliance Certification Application**

Features, Events, and Processes (FEPs)	Screening Classification	Comments	Appendix SCR Section
ECOLOGICAL FEPS			SCR.2.8
Plant, animal, and soil uptake			SCR.2.8.1
Plant uptake	SO-R	SO-C for 40 CFR § 191.15	
Animal uptake	SO-R		
Accumulation in soils	SO-C	Beneficial SO-C	
Human uptake			SCR.2.8.2
Ingestion	SO-R	SO-C for 40 CFR § 191.15	
Inhalation	SO-R	SO-C for 40 CFR § 191.15	
Irradiation	SO-R	SO-C for 40 CFR § 191.15	
Dermal sorption	SO-R	SO-C for 40 CFR § 191.15	
Injection	SO-R	SO-C for 40 CFR § 191.15	

**Legend:**

- UP FEPs accounted for in the assessment calculations for undisturbed performance for 40 CFR § 191.13 (as well as 40 CFR § 191.15 and Subpart C of 40 CFR Part 191).
- DP FEPs accounted for (in addition to all UP FEPs) in the assessment calculations for disturbed performance for 40 CFR § 191.13.
- SO-R FEPs eliminated from performance assessment calculations on the basis of regulations provided in 40 CFR Part 191 and criteria provided in 40 CFR Part 194.
- SO-C FEPs eliminated from performance assessment (and compliance assessment) calculations on the basis of consequence.
- SO-P FEPs eliminated from performance assessment (and compliance assessment) calculations on the basis of low probability of occurrence.

Further criteria concerning the scope of performance assessments are provided at 40 CFR § 194.32(c):

Performance assessments shall include an analysis of the effects on the disposal system of any activities that occur in the vicinity of the disposal system prior to disposal and are expected to occur in the vicinity of the disposal system soon after disposal. Such activities shall include, but shall not be limited to, existing boreholes and the development of any existing leases that can be reasonably expected to be developed in the near future, including boreholes and leases that may be used for fluid injection activities.

**Table 6-5. Human-Initiated EPs and Their Screening Classifications**

Events and Processes (EPs)	Screening Classification		Comments	Appendix SCR Section
	Historical/Ongoing/Near Future	Future		
GEOLOGICAL EPs				SCR.3.2
Drilling			DP for boreholes that penetrate the waste and boreholes that penetrate Castile brine underlying the waste disposal region. SO-C for other future drilling.	SCR.3.2.1
Oil and gas exploration	SO-C	DP		
Potash exploration	SO-C	DP		
Water resources exploration	SO-C	SO-C		
Oil and gas exploitation	SO-C	DP		
Groundwater exploitation	SO-C	SO-C		
Archeological investigations	SO-R	SO-R		
Geothermal	SO-R	SO-R		
Other resources	SO-C	DP		
Enhanced oil and gas recovery	SO-C	DP		
Liquid waste disposal	SO-R	SO-R		
Hydrocarbon storage	SO-R	SO-R		
Deliberate drilling intrusion	SO-R	SO-R		
Excavation activities				SCR.3.2.2
Potash mining	UP	DP	UP for mining outside the controlled area. DP for mining inside the controlled area.	
Other resources	SO-C	SO-R		
Tunneling	SO-R	SO-R		
Construction of underground facilities (for example storage, disposal, accommodation)	SO-R	SO-R		
Archeological excavations	SO-C	SO-R		
Deliberate mining intrusion	SO-R	SO-R		
Subsurface explosions				SCR.3.2.3
Resource recovery				SCR.3.2.3.1
Explosions for resource recovery	SO-C	SO-R		
Underground nuclear device testing				SCR.3.2.3.2
Underground nuclear device testing	SO-C	SO-R		

**Table 6-5. Human-Initiated EPs and Their Screening Classifications (Continued)**

Events and Processes (EPs)	Screening Classification		Comments	Appendix SCR Section
	Historical/Ongoing/Near Future	Future		
SUBSURFACE HYDROLOGICAL AND GEOCHEMICAL EPs				SCR.3.3
Borehole fluid flow				SCR.3.3.1
Drilling-induced flow				SCR.3.3.1.1
Drilling fluid flow	SO-C	DP	DP for boreholes that penetrate the waste. SO-C for other future drilling.	
Drilling fluid loss	SO-C	DP	DP for boreholes that penetrate the waste, SO-C for other future drilling	
Blowouts	SO-C	DP	DP for boreholes that penetrate the waste and boreholes that penetrate Castile brine underlying the waste disposal region. SO-C for other future drilling.	
Drilling-induced geochemical changes	UP	DP	SO-C for units other than the Culebra.	
Fluid extraction				SCR.3.3.1.2
Oil and gas extraction	SO-C	SO-R		
Groundwater extraction	SO-C	SO-R		
Fluid injection				SCR.3.3.1.3
Liquid waste disposal	SO-C	SO-R		
Enhanced oil and gas production	SO-C	SO-R		
Hydrocarbon storage	SO-C	SO-R		
Fluid-injection induced geochemical changes	UP	SO-R	SO-C for units other than the Culebra	
Flow through abandoned boreholes			Classification distinguishes the time when drilling occurs.	SCR.3.3.1.4
Natural borehole fluid flow	SO-C	DP	DP for boreholes that penetrate Castile brine underlying the waste disposal region. SO-C for other future boreholes.	
Waste-induced borehole flow	SO-R	DP	DP for boreholes that penetrate the waste. SO-C for other future boreholes.	

**Table 6-5. Human-Initiated EPs and Their Screening Classifications (Continued)**

Events and Processes (EPs)	Screening Classification		Comments	Appendix SCR Section
	Historical/Ongoing/Near Future	Future		
Flow through undetected boreholes	SO-P	NA		
Borehole-induced solution and subsidence	SO-C	SO-C		
Borehole-induced mineralization	SO-C	SO-C		
Borehole-induced geochemical changes	UP	DP	SO-C for units other than the Culebra Classification distinguishes the time when excavation occurs.	SCR.3.3.2
Excavation-induced flow				
Changes in groundwater flow due to mining	UP	DP	UP for mining outside the controlled area. DP for mining inside the controlled area.	
Changes in geochemistry due to mining	SO-C	SO-R		
Explosion-induced flow				SCR.3.3.3
Changes in groundwater flow due to explosions	SO-C	SO-R		
<b>GEOMORPHOLOGICAL EPs</b>				SCR.3.4
Land use and disturbances				SCR.3.4.1
Land use changes	SO-R	SO-R		
Surface disruptions	SO-C	SO-R		
<b>SURFACE HYDROLOGICAL EPs</b>				SCR.3.5
Water control and use				SCR.3.5.1
Damming of streams or rivers	SO-C	SO-R		
Reservoirs	SO-C	SO-R		
Irrigation	SO-C	SO-R		
Lake usage	SO-R	SO-R		
Altered soil or surface water chemistry by human activities	SO-C	SO-R		
<b>CLIMATIC EPs</b>				SCR.3.6
Anthropogenic climate change				SCR.3.6.1
Greenhouse gas effects	SO-R	SO-R		
Acid rain	SO-R	SO-R		
Damage to the ozone layer	SO-R	SO-R		

**Table 6-5. Human-Initiated EPs and Their Screening Classifications (Continued)**

Events and Processes (EPs)	Screening Classification		Comments	Appendix SCR Section
	Historical/ Ongoing/ Near Future	Future		
MARINE EPs				SCR.3.7
Marine activities				SCR.3.7.1
Coastal water use	SO-R	SO-R		
Sea water use	SO-R	SO-R		
Estuarine water use	SO-R	SO-R		
ECOLOGICAL EPs				SCR.3.8
Agricultural activities				SCR.3.8.1
Arable farming	SO-C	SO-R		
Ranching	SO-C	SO-R		
Fish farming	SO-R	SO-R		
Social and technological developments				SCR.3.8.2
Demographic change and urban development	SO-R	SO-R		
Loss of records	NA	DP		

**Legend:**

- UP FEPs accounted for in the assessment calculations for undisturbed performance for 40 CFR § 191.13 (as well as 40 CFR § 191.15 and Subpart C of 40 CFR Part 191).
- DP FEPs accounted for (in addition to all UP FEPs) in the assessment calculations for disturbed performance for 40 CFR § 191.13.
- SO-R FEPs eliminated from performance assessment calculations on the basis of regulations provided in 40 CFR Part 191 and criteria provided in 40 CFR Part 194.
- SO-C FEPs eliminated from performance assessment (and compliance assessment) calculations on the basis of consequence.
- SO-P FEPs eliminated from performance assessment (and compliance assessment) calculations on the basis of low probability of occurrence.
- NA FEPs not applicable to the particular category.

Performance assessments must include consideration of all human-initiated EPs relating to activities that have taken place or are reasonably expected to take place outside the controlled area in the near future.

In order to implement the criteria in 40 CFR § 194.32, relating to the scope of performance assessments, the DOE has divided human activities into three categories. Distinctions are made between (1) human activities that are currently taking place and those that took place prior to the time of the compliance application, (2) human activities that might be initiated in the near future after submission of the compliance application, and (3) human activities that might be initiated after repository closure. The first two categories of EPs are considered



1 under undisturbed performance, and EPs in the third category lead to disturbed performance  
2 conditions.

- 3
- 4 (1) Historical and current human activities include resource extraction activities that  
5 have historically taken place and are currently taking place outside the controlled  
6 area. These activities are of potential significance insofar as they could affect the  
7 geological, hydrological, or geochemical characteristics of the disposal system or  
8 groundwater flow pathways outside the disposal system. Current human activities  
9 taking place within the controlled area are essentially those associated with  
10 development of the WIPP repository. Historical activities include existing  
11 boreholes.
- 12
- 13 (2) Near-future human activities include resource extraction activities that may be  
14 expected to occur outside the controlled area based on existing plans and leases.  
15 Thus, the near future includes the expected lives of existing mines and oil and gas  
16 fields, and the expected lives of new mines and oil and gas fields that the DOE  
17 expects will be developed based on existing plans and leases. These activities are  
18 of potential significance insofar as they could affect the geological, hydrological, or  
19 geochemical characteristics of the disposal system or groundwater flow pathways  
20 outside the disposal system. The only human activities that are expected to occur  
21 within the controlled area in the near future are those associated with development  
22 of the WIPP repository. The DOE assumes that any activity that is expected to be  
23 initiated in the near future, based on existing plans and leases, will be initiated prior  
24 to repository closure. Activities initiated prior to repository closure are assumed to  
25 continue until their completion.
- 26
- 27 (3) Future human activities include activities that might be initiated within or outside  
28 the controlled area after repository closure. This includes drilling and mining for  
29 resources within the disposal system at a time when institutional controls cannot be  
30 assumed to completely eliminate the possibility of such activities. Future human  
31 activities could influence the transport of contaminants within and outside the  
32 disposal system by directly removing waste from the disposal system or altering the  
33 geological, hydrological, or geochemical characteristics of the disposal system.
- 34

35 In order to satisfy the criteria in 40 CFR § 194.32, performance assessments must consider the  
36 potential effects of historical, current, near-future, and future human activities on the  
37 performance of the disposal system. The criterion in 40 CFR § 194.25(a) concerned with  
38 predictions of the future states of society requires that performance assessments and  
39 compliance assessments “shall assume that the characteristics of the future remain what they  
40 are at the time the compliance application is prepared.” This criterion has been applied to  
41 eliminate the following human-initiated EPs from performance assessment calculations:

- 42
- 43 • drilling associated with geothermal energy production, liquid waste disposal,  
44 hydrocarbon storage, and archeological investigations (Appendix SCR, Sections  
45 SCR.3.2.1.1 and SCR.3.2.1.2),

- 1 • excavation activities associated with tunneling and construction of underground  
2 facilities (for example, storage, disposal, and accommodation) (Appendix SCR,  
3 Sections SCR.3.2.2.1 and SCR.3.2.2.2),  
4
- 5 • changes in land use (Appendix SCR, Section SCR.3.4.1.2),  
6
- 7 • anthropogenic climate change (Appendix SCR, Section SCR.3.6.1),  
8
- 9 • changes in agricultural practices (Appendix SCR, Section SCR.3.8.1.2),  
10
- 11 • demographic change, urban developments, and technological developments (Appendix  
12 SCR, Section SCR.3.8.2).  
13

14 As discussed in Chapter 8.0, compliance assessments (to determine compliance with 40 CFR  
15 § 191.15 and Subpart C of 40 CFR Part 191) need consider the undisturbed performance of  
16 the disposal system.  
17

#### 18 6.2.5.1 Historical, Current, and Near-Future Human Activities 19

20 The observational data obtained as part of WIPP site characterization reflect any effects of  
21 historical and current human activities in the vicinity of the WIPP, such as groundwater  
22 extraction and oil and gas production. As discussed in Appendix SCR (Section SCR.3),  
23 historic and current human activities are modeled or found to be of low consequence to long-  
24 term performance.  
25

26 Historical, current, and near-future human activities could affect WIPP site characteristics  
27 subsequent to the submission of this application, and could influence the performance of the  
28 disposal system. The hydrogeological impacts of historical, current and near-future potash  
29 mining outside the controlled area are accounted for in calculations of the undisturbed  
30 performance of the disposal system. Near-future potash mining is assumed to continue for the  
31 expected economic life of each mine. The potential consequences to the performance of the  
32 disposal system of other human-initiated EPs expected to occur in the Delaware Basin in the  
33 near future are discussed in Appendix SCR (Section SCR.3), which describes how these EPs  
34 are eliminated on the basis of low consequence.  
35

#### 36 6.2.5.2 Future Human Activities 37

38 Performance assessments (but not compliance assessments, as discussed in Chapter 8.0) must  
39 consider the effects of future human activities on the performance of the disposal system.  
40 The EPA has provided criteria relating to future human activities in 40 CFR § 194.32(a),  
41 which limits the scope of consideration of future human actions in performance assessments  
42 to mining and drilling.  
43

44 *Criteria concerning future mining:* The EPA provides additional criteria concerning the type  
45 of future mining that should be considered by the DOE in 40 CFR § 194.32(b):

1 Assessments of mining effects may be limited to changes in the hydraulic conductivity of the  
2 hydrogeologic units of the disposal system from excavation mining for natural resources.  
3 Mining shall be assumed to occur with a one in 100 probability in each century of the regulatory  
4 time frame. Performance assessments shall assume that mineral deposits of those resources,  
5 similar in quality and type to those resources currently extracted from the Delaware Basin, will  
6 be completely removed from the controlled area during the century in which such mining is  
7 randomly calculated to occur. Complete removal of such mineral resources shall be assumed to  
8 occur only once during the regulatory time frame.

9  
10 Thus, consideration of future mining may be limited to mining within the controlled area at the  
11 locations of resources that are similar in quality and type to those currently extracted from the  
12 Delaware Basin. Potash is the only resource that has been identified within the controlled  
13 area in quality similar to that currently mined from underground deposits elsewhere in the  
14 Delaware Basin. Within the controlled area, the McNutt of the Salado provides the only  
15 potash of appropriate quality. The hydrogeological impacts of future potash mining within the  
16 controlled area are accounted for in calculations of the disturbed performance of the disposal  
17 system. Consistent with 40 CFR § 194.32(b), all economically recoverable resources in the  
18 vicinity of the disposal system (outside the controlled area) are assumed to be extracted in the  
19 near future.

20  
21 *Criteria concerning future drilling:* With respect to consideration of future drilling, in the  
22 preamble to 40 CFR Part 194, the EPA “reasoned that while the resources drilled for today  
23 may not be the same as those drilled for in the future, the present rates at which these  
24 boreholes are drilled can nonetheless provide an estimate of the future rate at which boreholes  
25 will be drilled.” Criteria concerning the consideration of future deep and shallow drilling<sup>2</sup> in  
26 performance assessments are provided in 40 CFR § 194.33. These criteria require that, to  
27 calculate future drilling rates, the DOE should examine the historical rate of drilling for  
28 resources in the Delaware Basin. Historical drilling for purposes other than resource  
29 exploration and recovery (such as WIPP site investigation) need not be considered in  
30 determining future drilling rates.

31  
32 In particular, in calculating the frequency of future deep drilling, 40 CFR § 194.33(b)(3)(i)  
33 states that the DOE should

34  
35 Identify deep drilling that has occurred for each resource in the Delaware Basin over the past  
36 100 years prior to the time at which a compliance application is prepared.

37  
38 Oil and gas are the only known resources below 2,150 feet (655 meters) that have been  
39 exploited over the past 100 years in the Delaware Basin. However, some potash and sulfur  
40 exploration boreholes have been drilled in the Delaware Basin to depths in excess of  
41 2,150 feet (655 meters) below the surface relative to where the drilling occurred. Thus,  
42 consistent with 40 CFR § 194.33(b)(3)(i), the DOE has used the historical record of deep

---

<sup>2</sup> The EPA has defined two types of drilling in 40 CFR § 194.2: deep drilling is defined as “drilling events in the Delaware Basin that reach or exceed a depth of 2,150 feet below the surface relative to where such drilling occurred”; shallow drilling is defined as “drilling events in the Delaware Basin that do not reach a depth of 2,150 feet below the surface relative to where such drilling occurred.”

1 drilling associated with oil, gas, potash and sulfur exploration, and oil and gas exploitation in  
2 the Delaware Basin in calculations to determine the rate of deep drilling within the controlled  
3 area and throughout the basin in the future, as discussed in Appendix DEL, Section DEL.7.4  
4 (see also Table DEL-6). Deep drilling may occur within the controlled area after the end of  
5 the period of active institutional control (100 years after disposal).

6  
7 In calculating the frequency of future shallow drilling, 40 CFR § 194.33(b)(4)(i) states that the  
8 DOE should

9  
10 Identify shallow drilling that has occurred for each resource in the Delaware Basin over the past  
11 100 years prior to the time at which a compliance application is prepared.

12  
13 An additional criterion with respect to the calculation of future shallow drilling rates is  
14 provided in 40 CFR § 194.33(b)(4)(iii):

15  
16 In considering the historical rate of all shallow drilling, the Department may, if justified,  
17 consider only the historical rate of shallow drilling for resources of similar type and quality to  
18 those in the controlled area.

19  
20 As an example of the use of the criterion in 40 CFR § 194.33(b)(4)(iii) the EPA states in the  
21 preamble to 40 CFR Part 194 that “if only non-potable water can be found within the  
22 controlled area, then the rate of drilling for water may be set equal to the historical rate of  
23 drilling for non-potable water in the Delaware Basin over the past 100 years.” Thus, the DOE  
24 may limit the rate of future shallow drilling based on a determination of the potential  
25 resources in the controlled area. Shallow drilling associated with water, potash, sulfur, oil, and  
26 gas extraction has taken place in the Delaware Basin over the past 100 years. However, of  
27 these resources, only water and potash are present at shallow depths (less than 2,150 feet [655  
28 meters] below the surface) within the controlled area. Thus, consistent with  
29 40 CFR § 194.33(b)(4), the DOE has used the historical record of shallow drilling associated  
30 with water and potash extraction in the Delaware Basin in calculations to determine the rate  
31 of shallow drilling within the controlled area, as discussed in Appendix DEL (Sections  
32 DEL.7.2 and DEL.7.4).

33  
34 The EPA also provides a criterion in 40 CFR § 194.33(d) concerning the use of future  
35 boreholes subsequent to drilling:

36  
37 With respect to future drilling events, performance assessments need not analyze the effects of  
38 techniques used for resource recovery subsequent to the drilling of the borehole.

39 Thus, performance assessments need not consider the effects of techniques used for resource  
40 extraction and recovery, that would occur subsequent to the drilling of a borehole in the  
41 future.

42  
43 The EPA provides an additional criterion that limits the severity of human intrusion scenarios  
44 that must be considered in performance assessments. In 40 CFR § 194.33(b)(1) the EPA  
45 states that

1 Inadvertent and intermittent intrusion by drilling for resources (other than those resources  
2 provided by the waste in the disposal system or engineered barriers designed to isolate such  
3 waste) is the most severe human intrusion scenario.

4  
5 Thus, human intrusion scenarios involving deliberate intrusion need not be considered in  
6 performance assessments.

7  
8 *Screening of future human-initiated EPs:* Future human-initiated EPs accounted for in  
9 performance assessment calculations for the WIPP are those associated with mining and deep  
10 drilling within the controlled area at a time when institutional controls cannot be assumed to  
11 eliminate completely the possibility of such activities. All other future human-initiated EPs, if  
12 not eliminated from performance assessment calculations based on regulation, have been  
13 eliminated based on low consequence or low probability. For example, the effects of future  
14 shallow drilling within the controlled area have been eliminated from performance assessment  
15 calculations on the basis of low consequence to the performance of the disposal system.  
16 These screening decisions are listed in Table 6-5 and are discussed in Appendix SCR (Section  
17 SCR.3).

### 18 19 **6.3 Scenario Development and Selection**

20  
21 This section addresses the formation of scenarios from FEPs that have been retained for  
22 performance assessment calculations, and introduces the specification of scenarios for  
23 consequence analysis. Specification of probabilities associated with scenarios is discussed in  
24 Section 6.4.12.

25  
26 Logic diagrams are used to illustrate the formation of scenarios for consequence analysis from  
27 combinations of FEPs that remain after FEP screening (Cranwell et al. 1990) (Figure 6-7).  
28 Each scenario shown in Figure 6-7 is defined by a combination of occurrence and  
29 nonoccurrence of all potentially disruptive EPs. Disruptive EPs are defined as those EPs that  
30 result in the creation of new pathways, or significant alteration of existing pathways, for fluid  
31 flow and, potentially, radionuclide transport within the disposal system. Each of these  
32 scenarios also contains a set of features and nondisruptive EPs that remain after FEP  
33 screening. As shown in Figure 6-7, undisturbed performance and disturbed performance  
34 scenarios are considered in consequence modeling for the WIPP performance assessment.  
35 The undisturbed performance scenario, as discussed in Chapter 8.0, is used for compliance  
36 assessments. Important aspects of undisturbed and disturbed performance are summarized in  
37 this section.

#### 38 39 **6.3.1 Undisturbed Performance**

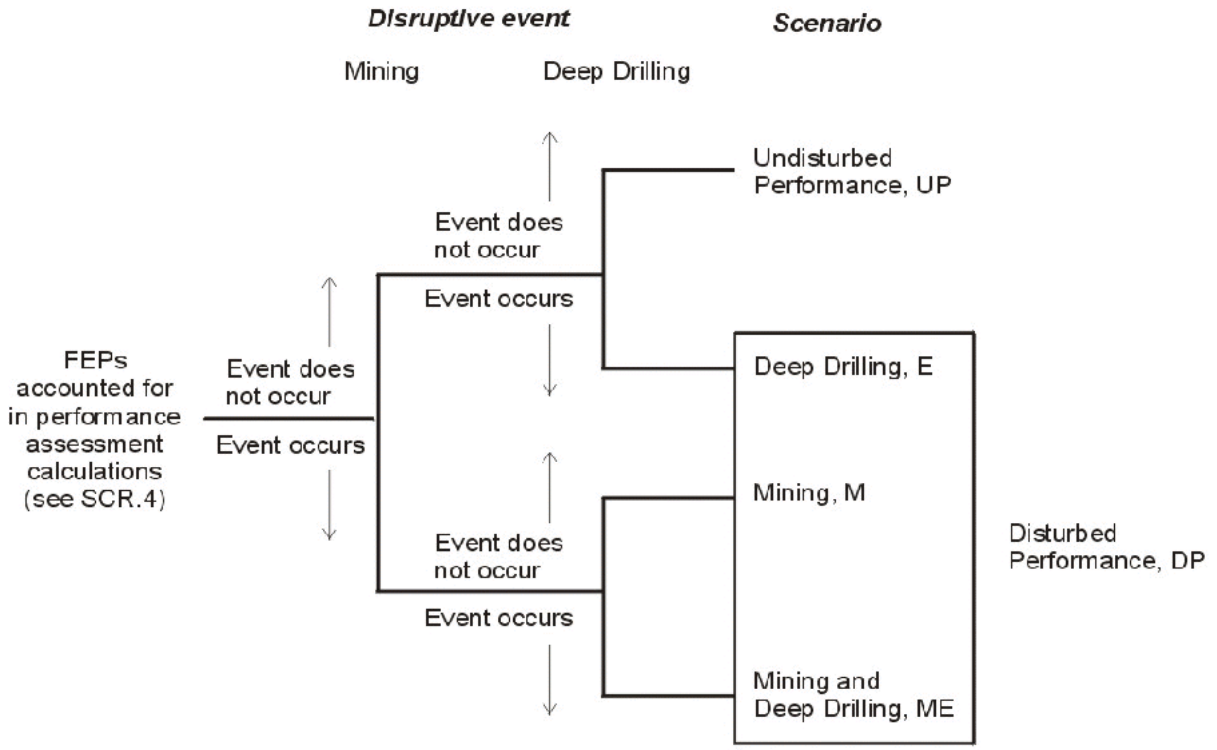
40  
41 Undisturbed performance is defined in 40 CFR § 191.12 to mean “the predicted behavior of a  
42 disposal system, including consideration of the uncertainties in predicted behavior, if the  
43 disposal system is not disrupted by human intrusion or the occurrence of unlikely natural  
44 events.” Consideration of only undisturbed performance is required for compliance  
45 assessments with respect to the Individual and Groundwater Protection Requirements (40  
46 CFR § 191.15 and 40 CFR § 191.24) (see Chapter 8.0). Undisturbed performance is also

1 considered, together with disturbed performance, for performance assessments with respect to  
2 the Containment Requirements (40 CFR § 191.13).

3  
4 No potentially disruptive natural EPs are likely to occur during the regulatory time frame  
5 (Section 6.2.3 and Appendix SCR, Section SCR.1). Therefore, all naturally occurring EPs  
6 retained for scenario construction are nondisruptive and are considered as part of undisturbed  
7 performance. The only natural features and waste- and repository-induced FEPs retained  
8 after screening that are not included in the undisturbed performance scenario but are included  
9 in disturbed performance are those directly associated with the potential effects of future deep  
10 drilling within the controlled area. These drilling-related FEPs are discussed in Section 6.3.2.  
11 Potash mining outside the controlled area does not constitute a disruption of the disposal  
12 system by human intrusion and is included in the undisturbed performance scenario. In total,  
13 67 undisturbed performance FEPs have been identified (Section 6.2.3). These FEPs have  
14 been assigned a screening designator UP in tables in Section 6.2.3 and Appendix SCR and are  
15 listed separately in Table 6-6. Table 6-6 also contains references to text in Section 6.4 that  
16 describes the conceptual models that account for the undisturbed performance FEPs.

17  
18 Among the most significant FEPs that will affect the undisturbed performance within the  
19 disposal system are excavation-induced fracturing, gas generation, salt creep, and MgO  
20 backfill in the disposal rooms:

- 21 • The excavation of the repository and the consequent changes in the stress field in the  
22 rock surrounding the excavated opening will result in the creation of a DRZ  
23 immediately adjacent to excavated openings. The DRZ will exhibit mechanical and  
24 hydrological properties different than those of the intact rock.
  - 25 • Organic material in the waste may degrade because of microbial activity, and brine  
26 will corrode metals in the waste and waste containers, with concomitant generation of  
27 gases. Gas generation may result in pressures sufficient to both maintain or develop  
28 fractures and change the fluid flow pattern around the waste disposal region.
  - 29 • At the repository depth, salt creep will tend to heal fractures and reduce the  
30 permeability of the DRZ and the crushed salt component of the long-term shaft seals  
31 to near that of the host rock salt.
- 32  
33  
34  
35



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Figure 6-7. Logic Diagram for Scenario Analysis

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**Table 6-6. Undisturbed Performance (UP) FEPs**

Undisturbed Performance Features, Events, and Processes (FEPs)	Chapter Section
NATURAL FEPs	
Geological	
Stratigraphy	
Stratigraphy	6.4.2
Structural effects	
Seismic activity	
Seismic activity	6.4.5.3
Geochemical	
Dissolution	
Shallow dissolution	6.4.6.2
Subsurface hydrological	
Groundwater characteristics	
Saturated groundwater flow	6.4.5
	6.4.6
Unsaturated groundwater flow	6.4.6
Fracture flow	6.4.6.2
Effects of preferential pathways	6.4.6.2
Subsurface geochemical	
Groundwater geochemistry	
Groundwater geochemistry	6.4.3.4
	6.4.6.2
Geomorphological	
Physiography	
Physiography	6.4.2
Surface hydrological	
Groundwater recharge and discharge	
Groundwater discharge	6.4.10.2
Groundwater recharge	6.4.10.2
Infiltration	6.4.10.2
Changes in surface hydrology	
Changes in groundwater recharge and discharge	6.4.9
Climatic	
Climate	
Precipitation (for example, rainfall)	6.4.9
Temperature	6.4.9
Climate change	
Meteorological	
Climate change	6.4.9
WASTE- AND REPOSITORY-INDUCED FEPs	
Waste and repository characteristics	
Repository characteristics	
Disposal geometry	6.4.2.1
Waste characteristics	
Waste inventory	6.4.3.3

**Table 6-6. Undisturbed Performance (UP) FEPs (Continued)**

Undisturbed Performance Features, Events, and Processes (FEPs)	Chapter Section
Container characteristics	
Container material inventory	6.4.3.3
Seal characteristics	
Seal geometry	6.4.3
Seal physical properties	6.4.4
Backfill characteristics	
Backfill chemical composition	6.4.3.4
Radiological	
Radioactive decay	
Radionuclide decay and ingrowth	6.4.5.4.2 6.4.12.4
Geological and Mechanical	
Excavation-induced fracturing	
DRZ	6.4.5.3
Excavation-induced changes in stress	6.4.3.1
Rock creep	
Salt creep	6.4.3.1
Changes in the stress field	6.4.3.1
Roof falls	
Roof falls	6.4.5.3
Effects of fluid pressure changes	
Disruption due to gas effects	6.4.5.2
Pressurization	6.4.5.2
Effects of explosions	
Gas explosions	6.4.5.3
Mechanical effects on material properties	
Consolidation of waste	6.4.3.1
Consolidation of seals	6.4.4
Mechanical degradation of seals	6.4.4
Underground boreholes	6.4.5.3
Subsurface hydrological and fluid dynamics	
Repository-induced flow	
Brine inflow	6.4.3.2
Wicking	6.4.3.2
Effects of gas generation	
Fluid flow due to gas production	6.4.3.2
Geochemical and chemical	
Gas generation	
Microbial gas generation	
Degradation of organic material	6.4.3.3
Effects of temperature on microbial gas generation	6.4.3.3
Effects of biofilms on microbial gas generation	6.4.3.3
Corrosion	
Gases from metal corrosion	6.4.3.3
Chemical effects of corrosion	6.4.3.3

**Table 6-6. Undisturbed Performance (UP) FEPs (Continued)**

Undisturbed Performance Features, Events, and Processes (FEPs)	Chapter Section
Chemical speciation	
Speciation	6.4.3.4
	6.4.3.5
Precipitation and dissolution	
Dissolution of waste	6.4.3.5
Sorption	
Actinide sorption	6.4.3.6
	6.4.6.2.1
Kinetics of sorption	6.4.6.2.1
Changes in sorptive surfaces	6.4.6.2.1
Reduction-oxidation chemistry	
Effect of metal corrosion	6.4.3.5
Reduction-oxidation kinetics	6.4.3.5
Organic complexation	
Humic and fulvic acids	6.4.3.6
	6.4.6.2.2
Chemical effects on material properties	
Chemical degradation of seals	6.4.4
Microbial growth on concrete	6.4.4
Contaminant transport mode	
Solute transport	
Solute transport	6.4.5.4
	6.4.6.2.1
Colloid transport	
Colloid transport	6.4.6.2.2
Colloid formation and stability	6.4.3.6
Colloid filtration	6.4.6.2.2
Colloid sorption	6.4.6.2.2
Microbial transport	
Microbial transport	6.4.6.2.2
Contaminant transport processes	
Advection	
Advection	6.4.5.4
	6.4.6.2
Diffusion	
Diffusion	6.4.5.4
	6.4.6.2
Matrix diffusion	6.4.6.2
HUMAN-INITIATED EPs	
Geological	
Excavation activities	
Potash mining outside controlled area	6.4.6.2.3
	6.4.12.8
	6.4.13.8

**Table 6-6. Undisturbed Performance (UP) FEPs (Continued)**

Undisturbed Performance Features, Events, and Processes (FEPs)	Chapter Section
Subsurface hydrological and geochemical	
Borehole fluid flow	
Drilling-induced flow	
Drilling induced geochemical changes	6.4.6.2
Fluid injection	
Fluid injection-induced geochemical changes	6.4.6.2
Flow through abandoned boreholes	
Borehole-induced geochemical changes	6.4.6.2
Excavation-induced flow	
Changes in groundwater flow due to mining	6.4.6.2.3
	6.4.12.8
	6.4.13.8

- The MgO backfill emplaced in the disposal rooms will react with carbon dioxide and maintain mildly alkaline conditions. Corrosion of metals in the waste and waste containers will maintain reducing conditions. These effects will control radionuclide solubility.

Radionuclides can become mobile as a result of waste dissolution and colloid generation following brine flow into the disposal rooms. Colloids may be generated from the waste (humics, mineral fragments, and actinide intrinsic colloids) or from other sources (humics, mineral fragments, and microbes).

Conceptually, there are several pathways for radionuclide transport within the undisturbed disposal system that may result in releases to the accessible environment (Figure 6-8). Contaminated brine may migrate away from the waste-disposal panels if pressure within the panels is elevated by the generation of gas from corrosion or microbial degradation. Radionuclide transport may occur laterally, through the anhydrite interbeds toward the subsurface boundary of the accessible environment in the Salado, or through access drifts or anhydrite interbeds (primarily MB139) to the base of the shafts. In the latter case, if the pressure gradient between the panels and overlying strata is sufficient, then contaminated brine may migrate up the shafts. As a result, radionuclides may be transported directly to the ground surface, or they may be transported laterally away from the shafts, through permeable strata such as the Culebra, toward the subsurface boundary of the accessible environment. These conceptual pathways are shown in Figure 6-8.

The modeling system described in Section 6.4 includes potential radionuclide transport along other pathways, such as migration through Salado halite. However, the natural properties of the undisturbed system make radionuclide transport to the accessible environment via these other pathways unlikely.

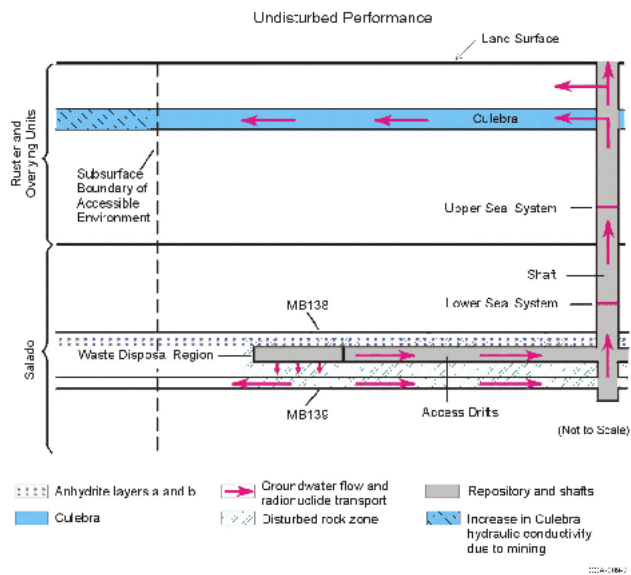


Figure 6-8. Conceptual Release Pathways for the Undisturbed Performance Scenario

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1 **6.3.2 Disturbed Performance**

2  
3 Assessments for compliance with 40 CFR § 191.13 need to consider the potential effects of  
4 future disruptive natural and human-initiated EPs on the performance of the disposal system.  
5 As discussed in Section 6.2.3, no potentially disruptive natural EPs are considered to be  
6 sufficiently likely to require inclusion in analyses of either undisturbed or disturbed  
7 performance. The only future human-initiated EPs retained after FEP screening are those  
8 associated with mining and deep drilling (but not the subsequent use of a borehole) within the  
9 controlled area at a time when institutional controls cannot be assumed to eliminate the  
10 possibility of such activities (Sections 6.2.5.2 and 6.4.12.1). In total, 21 disturbed  
11 performance FEPs associated with future mining and deep drilling have been identified.  
12 These FEPs have been assigned a screening designator DP in tables in Section 6.2 and  
13 Appendix SCR and are listed separately in Table 6-7. Table 6-7 also contains references to  
14 text in Section 6.4 that describes the conceptual models which account for the disturbed  
15 performance FEPs.

16  
17 For evaluation of the consequences of disturbed performance the DOE has defined the mining  
18 scenario, M, the deep drilling scenario, E, and a mining and drilling scenario, ME. These  
19 scenarios are described in the following sections.

20  
21 **6.3.2.1 The Disturbed Performance Mining Scenario (M)**

22  
23 The disturbed performance mining scenario, M, involves future mining within the controlled  
24 area.

25  
26 Consistent with the criteria stated by the EPA in 40 CFR § 194.32 (b), for performance  
27 assessment calculations, the effects of potential future mining within the controlled area are  
28 limited to changes in hydraulic conductivity of the Culebra that result from subsidence (as  
29 described in Section 6.4.6.2.3).

30  
31 Radionuclide transport may be affected in the M scenario if a head gradient between the  
32 waste-disposal panels and the Culebra causes brine contaminated with radionuclides to move  
33 from the waste-disposal panels to the base of the shafts and up the shafts to the Culebra. The  
34 changes in the Culebra transmissivity field may affect the rate and direction of radionuclide  
35 transport within the Culebra. Features of the M scenario are illustrated in Figure 6-9.  
36 The three disturbed performance FEPs labeled M in Table 6-7 relate to the occurrence and  
37 effects of future mining. The modeling system used for the M scenario is similar to that  
38 developed for the undisturbed performance scenario, but with a modified Culebra  
39 transmissivity field within the controlled area to account for the effects of mining.

**Table 6-7. Disturbed Performance (DP) FEPs**

Disturbed Performance Features, Events, and Processes (FEPs)	Scenario	Chapter Section
ALL UNDISTURBED PERFORMANCE (UP) FEPS		
NATURAL FEPs		
Geological		
Stratigraphy		
Brine reservoirs	E1	6.4.8 6.4.12.6
WASTE- AND REPOSITORY-INDUCED FEPs		
Waste and repository characteristics		
Waste characteristics		
Heterogeneity of waste forms	E1, E2	6.4.12.4
Contaminant transport mode		
Particulate transport		
Suspensions of particles	E1, E2	6.4.7.1
Cuttings	E1, E2	6.4.7.1
Cavings	E1, E2	6.4.7.1
Spallings	E1, E2	6.4.7.1 6.4.13.7
HUMAN-INITIATED EPs		
Geological		
Drilling		
Oil and gas exploration	E1, E2	6.4.7 6.4.12.2
Potash exploration	E1, E2	6.4.7 6.4.12.2
Oil and gas exploitation	E1, E2	6.4.7 6.4.12.2
Other resources	E1, E2	6.4.7 6.4.12.2
Enhanced oil and gas recovery	E1, E2	6.4.7 6.4.12.2
Excavation activities		
Potash mining	M	6.4.6.2.3 6.4.12.8 6.4.13.8
Subsurface hydrological and geochemical		
Borehole fluid flow		
Drilling-induced flow		
Drilling fluid flow	E1, E2	6.4.7.1
Drilling fluid loss	E2	6.4.7.1.1
Blowouts	E1, E2	6.4.7.1.1
Drilling-induced geochemical changes	E1, E2	6.4.6.2
Flow through abandoned boreholes		

**Table 6-7. Disturbed Performance (DP) FEPs (Continued)**



**Title 40 CFR Part 191 Compliance Certification Application**

<b>Disturbed Performance Features, Events, and Processes (FEPs)</b>	<b>Scenario</b>	<b>Chapter Section</b>
Natural borehole fluid flow	E1, E2	6.4.7.2 6.4.12.7 6.4.13
Waste-induced borehole flow	E1, E2	6.4.7.2 6.4.12.7 6.4.13
Borehole-induced geochemical changes	E1, E2	6.4.6.2
Excavation-induced flow		
Changes to groundwater flow due to mining	M	6.4.6.2.3 6.4.12.8 6.4.13.8
Ecological		
Social and technological developments		
Loss of records	M, E1, E2	6.4.7 6.4.12.1

**Legend:**

- M Mining within the controlled area.
- E1 Deep drilling that intersects the waste disposal region and a brine reservoir in the Castile.
- E2 Deep drilling that intersects a waste disposal panel.

**6.3.2.2 The Disturbed Performance Deep Drilling Scenario (E)**

The disturbed performance deep drilling scenario, E, involves at least one deep drilling event that intersects the waste disposal region. The EPA provides criteria concerning analysis of the consequences of future drilling events in performance assessments in 40 CFR § 194.33(c):

Performance assessments shall document that in analyzing the consequences of drilling events, the Department assumed that:

- (1) Future drilling practices and technology will remain consistent with practices in the Delaware Basin at the time a compliance application is prepared. Such future drilling practices shall include, but shall not be limited to: the types and amounts of drilling fluids; borehole depths, diameters, and seals; and the fraction of such boreholes that are sealed by humans; and
- (2) Natural processes will degrade or otherwise affect the capability of boreholes to transmit fluids over the regulatory time frame.

Consistent with these criteria, there are several pathways for radionuclides to reach the accessible environment in the E scenario. During the period before any deep drilling intersects the waste, potential release pathways are identical to those in the undisturbed performance scenario.

If a borehole intersects the waste in the disposal rooms, releases to the accessible environment may occur as material entrained in the circulating drilling fluid is brought to the surface, as discussed further in Section 6.4.7.1. Particulate waste brought to the surface may include cuttings, cavings, and spallings. Cuttings are the materials cut by the drill bit as it passes through waste. Cavings are the materials eroded by the drilling fluid in the annulus around the

1 drill bit. Spallings are the materials that may be forced into the circulating drilling fluid if  
2 there is sufficient pressure in the waste disposal panels. During drilling, contaminated brine  
3 may flow up the borehole and reach the surface, depending on fluid pressure within the waste  
4 disposal panels.

5  
6 When abandoned, the borehole is assumed to be plugged in a manner consistent with current  
7 practice in the Delaware Basin (see Section 6.4.7.2; Appendix DEL, Sections DEL.5 and  
8 DEL.6; and Appendix MASS, Section MASS.16.3 and MASS Attachment 16-1). An  
9 abandoned intrusion borehole with degraded casing and/or plugs may provide a pathway for  
10 fluid flow and contaminant transport from the intersected waste panel to the ground surface if  
11 the fluid pressure within the panel is sufficiently greater than hydrostatic. Additionally, if  
12 brine flows through the borehole to overlying units, such as the Culebra, it may carry  
13 dissolved and colloidal actinides that can be transported laterally to the accessible  
14 environment by natural groundwater flow in the overlying units.

15  
16 Alternatively, the units intersected by an intrusion borehole may provide sources for brine  
17 flow to a waste panel during or after drilling. For example, in the northern Delaware Basin,  
18 the Castile, which underlies the Salado, contains isolated volumes of brine at fluid pressures  
19 greater than hydrostatic (as discussed in Section 2.2.1.2.2). The WIPP-12 penetration of one  
20 of these reservoirs provided data on one brine reservoir within the controlled area. The  
21 location and properties of brine reservoirs cannot be reliably predicted; thus, the possibility of  
22 a deep borehole penetrating both a waste panel and a brine reservoir is accounted for in  
23 consequence analysis of the WIPP, as discussed in Section 6.4.8. Such a borehole could  
24 provide a connection for brine flow from the Castile to the waste panel, thus increasing fluid  
25 pressure and brine volume in the waste panel.

26  
27 Also, a borehole that is drilled through a disposal room pillar, but does not intersect waste,  
28 could penetrate the brine reservoir underlying the waste disposal region. Such an event  
29 would, to some extent, depressurize the brine reservoir, and thus would affect the  
30 consequences of any subsequent intersections of the reservoir. The possibility for boreholes  
31 that do not penetrate the waste to depressurize a brine reservoir underlying the waste disposal  
32 region is accounted for in the consequence analysis of the WIPP.

33  
34 The DOE has distinguished two types of deep drilling events by whether or not the borehole  
35 intersects a Castile brine reservoir. A borehole that intersects a waste disposal panel and  
36 penetrates a Castile brine reservoir has been designated an E1 event. The 18 disturbed  
37 performance FEPs labeled E1 in Table 6-7 relate to the occurrence and effects of an E1  
38 drilling event. A borehole that intersects a waste panel but does not penetrate a Castile brine  
39 reservoir has been designated an E2 event. The 18 disturbed performance FEPs labeled E2 in  
40 Table 6-7 relate to the occurrence and effects of an E2 drilling event.

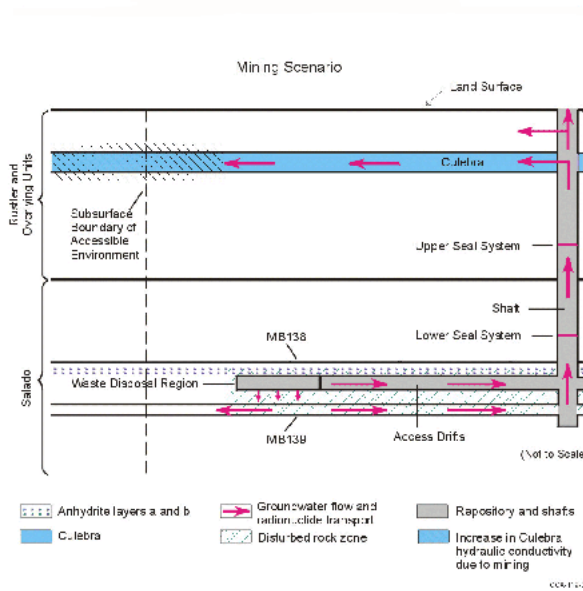


Figure 6-9. Conceptual Release Pathways for the Disturbed Performance Mining Scenario

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1 In order to evaluate the consequences of future deep drilling, the DOE has divided the E  
2 scenario into three drilling subscenarios, E1, E2 and E1E2, distinguished by the number of E1  
3 and E2 drilling events that are probabilistically assumed to occur in the regulatory time frame.  
4 These subscenarios are described in order of increasing complexity in the following sections.  
5

#### 6 *6.3.2.2.1 The E2 Scenario*

7

8 The E2 scenario is the simplest scenario for inadvertent human intrusion into a waste disposal  
9 panel. In this scenario, a panel is penetrated by a drill bit; cuttings, cavings, spillings, and  
10 brine flow releases may occur; and brine flow may occur in the borehole after it is plugged  
11 and abandoned. Sources for brine that may contribute to long-term flow up the abandoned  
12 borehole are the Salado or, under certain conditions, the units above the Salado. An E2  
13 scenario may involve more than one E2 drilling event. Features of the E2 scenario are  
14 illustrated in Figure 6-10. A modeling system has been developed to evaluate the  
15 consequences of an E2 scenario during which single or multiple E2 events occur.  
16

#### 17 *6.3.2.2.2 The E1 Scenario*

18

19 Any scenario with one inadvertent penetration of a waste panel that also penetrates a Castile  
20 brine reservoir is called E1. Features of this scenario are illustrated in Figure 6-11.  
21

22 Sources of brine in the E1 scenario are the brine reservoir, the Salado and, under certain  
23 conditions, the units above the Salado. However, the brine reservoir is conceptually the  
24 dominant source of brine in this scenario. The model configuration developed for the E1  
25 scenario is used to evaluate the consequences of futures that have only one E1 event. A  
26 future during which more than one E1 event occurs is described as an E1E2 scenario.  
27

#### 28 *6.3.2.2.3 The E1E2 Scenario*

29

30 The E1E2 scenario is defined as all futures that have multiple penetrations of a waste panel of  
31 which at least one intrusion is an E1 type. One case of this scenario, with a single E1 event  
32 and a single E2 event penetrating the same panel, is illustrated in Figure 6-12. However, the  
33 E1E2 scenario can include many possible combinations of intrusion times, locations, and  
34 types of event (E1 or E2). The sources of brine in this scenario are those listed for the E1  
35 scenario, and multiple E1-type sources may be present. The E1E2 scenario potentially has a  
36 flow path not present in the E1 or E2 scenarios: flow from an E1 borehole through the waste  
37 to another borehole. This flow path has the potential to (1) bring large quantities of brine in  
38 direct contact with waste and (2) provide a less restrictive path for this brine to flow to the  
39 units above the Salado (via multiple boreholes) compared to either the E1 or E2 individual  
40 scenarios. It is both the presence of brine reservoirs and the potential for flow through the  
41 waste to other boreholes that make this scenario different in terms of potential consequences  
42 from combinations of E2 boreholes. The extent to which flow occurs between boreholes, as  
43 estimated by modeling, determines whether combinations of E1 and E2 boreholes at specific  
44 locations in the repository should be treated as E1E2 scenarios or as independent E1 and E2  
45 scenarios in the consequence analysis. Because of the number of possible combinations of

1 drilling events, the modeling configuration for the E1E2 scenario differs in significant ways  
2 from the model configuration used for evaluating E1 and E2 scenarios. This configuration is  
3 described in Section 6.4.13.5.

### 4 5 6.3.2.3 The Disturbed Performance Mining and Deep Drilling Scenario (ME)

6  
7 Mining in the WIPP site (the M scenario) and deep drilling (the E scenario) may both occur in  
8 the future. The DOE calls a future in which both of these events occur the ME scenario. The  
9 occurrence of both mining and deep drilling do not create processes in addition to those  
10 already described separately for the M and E scenarios. For example, the occurrence of  
11 mining does not influence any of the interactions between deep boreholes and the repository  
12 or brine reservoirs. As well, the occurrence of drilling does not impact the effects of mining  
13 on Culebra hydrogeology. The difference between the M and E scenarios considered  
14 separately and the ME scenario is that the combination of borehole transport to the Culebra  
15 (E) and a transmissivity field impacted by mining (M) may result in more rapid transport of  
16 actinides to the accessible environment. For example, because the M scenario does not  
17 include drilling the only pathway for actinides to reach the Culebra is up the sealed shafts.  
18 For clarity in describing computational results, the ME scenario has been subdivided  
19 according to the types of deep drilling subscenarios into the ME1 scenario (M and E1), the  
20 ME2 scenario (M and E2), and the ME1E2 scenario (M and E1E2).

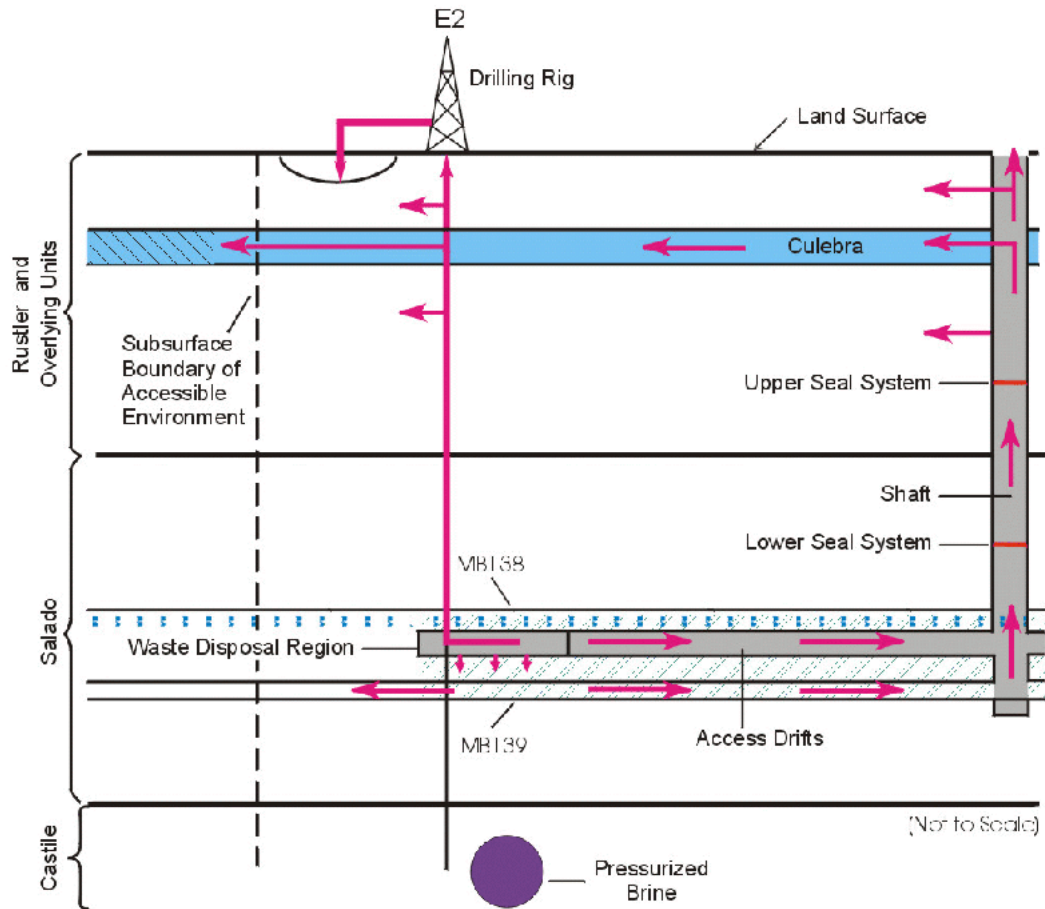
21  
22 The system used for modeling flow and transport in the Culebra for the ME scenario is similar  
23 to that used for the E scenario. However, in the ME scenario the Culebra transmissivity field  
24 is modified to account for the effects of mining within the controlled area.

### 25 26 **6.3.3 Scenarios Retained for Consequence Analysis**

27  
28 These scenarios described in Sections 6.3.1 and 6.3.2 have been retained for consequence  
29 analysis to determine compliance with the Containment Requirements in 40 CFR § 191.13.  
30 The modeling systems used to evaluate the consequences of these undisturbed and disturbed  
31 performance scenarios are discussed in Section 6.4. For consequence analysis, the scenarios  
32 and subscenarios described in this section are further subdivided into scenarios,  $S_i$ . The  $S_i$   
33 scenarios are distinguished by, for example, the time of occurrence of disruptive events. The  
34  $S_i$  scenarios are generated, and their probabilities determined, by probabilistic sampling of  
35 selected processes and events (see Sections 6.1.5.2 and 6.4.12).

### 36 37 **6.4 Calculation of Scenario Consequences**

38  
39 Scenario consequence,  $cS_i$ , is the third element of the ordered triples shown in Equation 2 in  
40 Section 6.1.1. Estimation of  $cS_i$  requires quantitative modeling; performance assessment uses  
41 a linked system of individual computer codes. This section discusses the conceptual and  
42 computational models and some parameter values used to estimate the consequence of the



Note: Borehole penetrates waste and does not penetrate pressurized brine in the underlying Castile Formation. Arrows indicate hypothetical direction of groundwater flow and radionuclide transport.

- |                          |   |  |
|--------------------------|---|--|
| Anhydrite layers a and b | Groundwater flow and radionuclide transport | Repository and shafts                                    |
| Culebra                  | Disturbed rock zone                         | Increase in Culebra hydraulic conductivity due to mining |

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**Figure 6-10. Conceptual Release Pathways for the Disturbed Performance Deep Drilling E2 Scenario**

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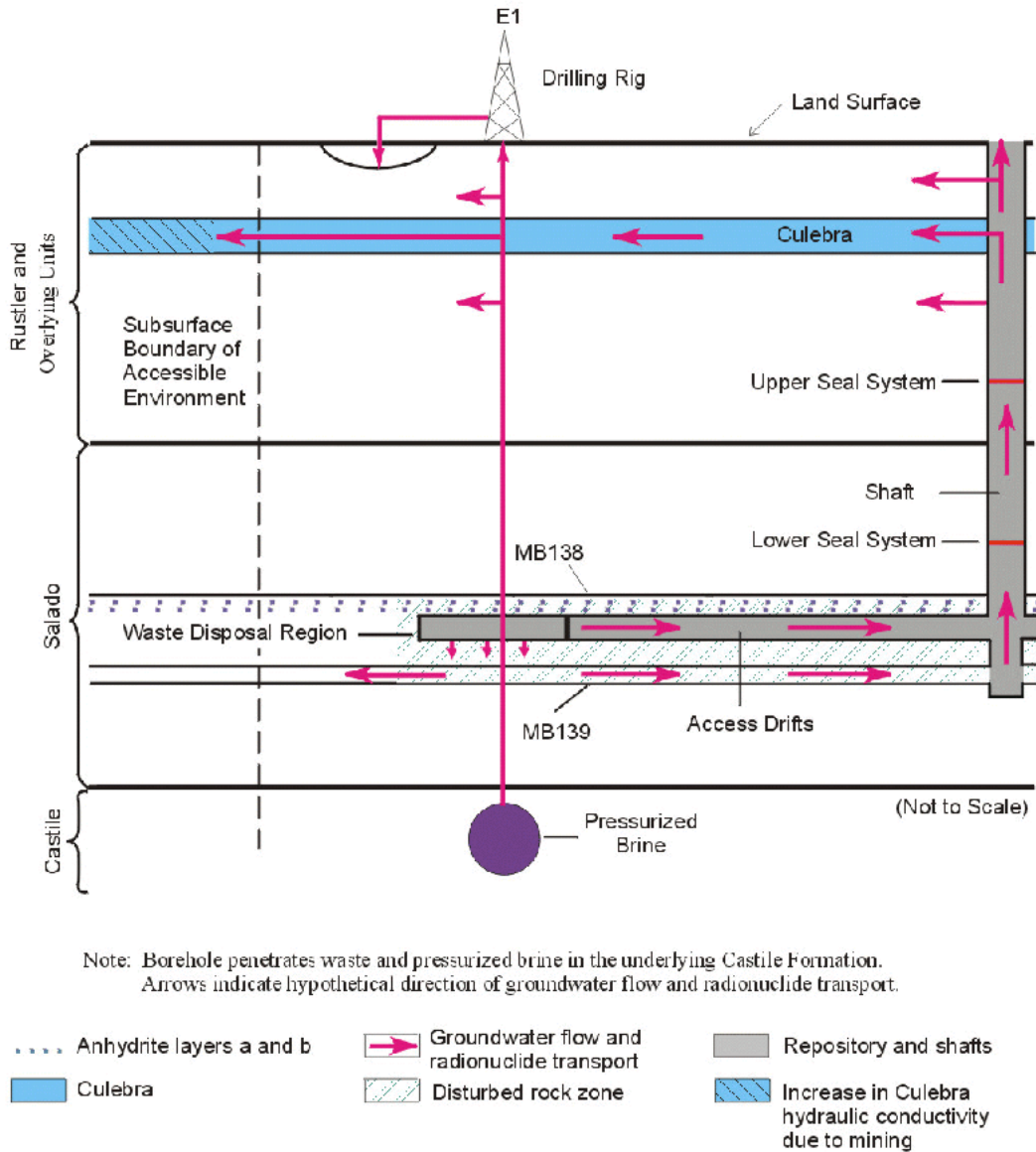
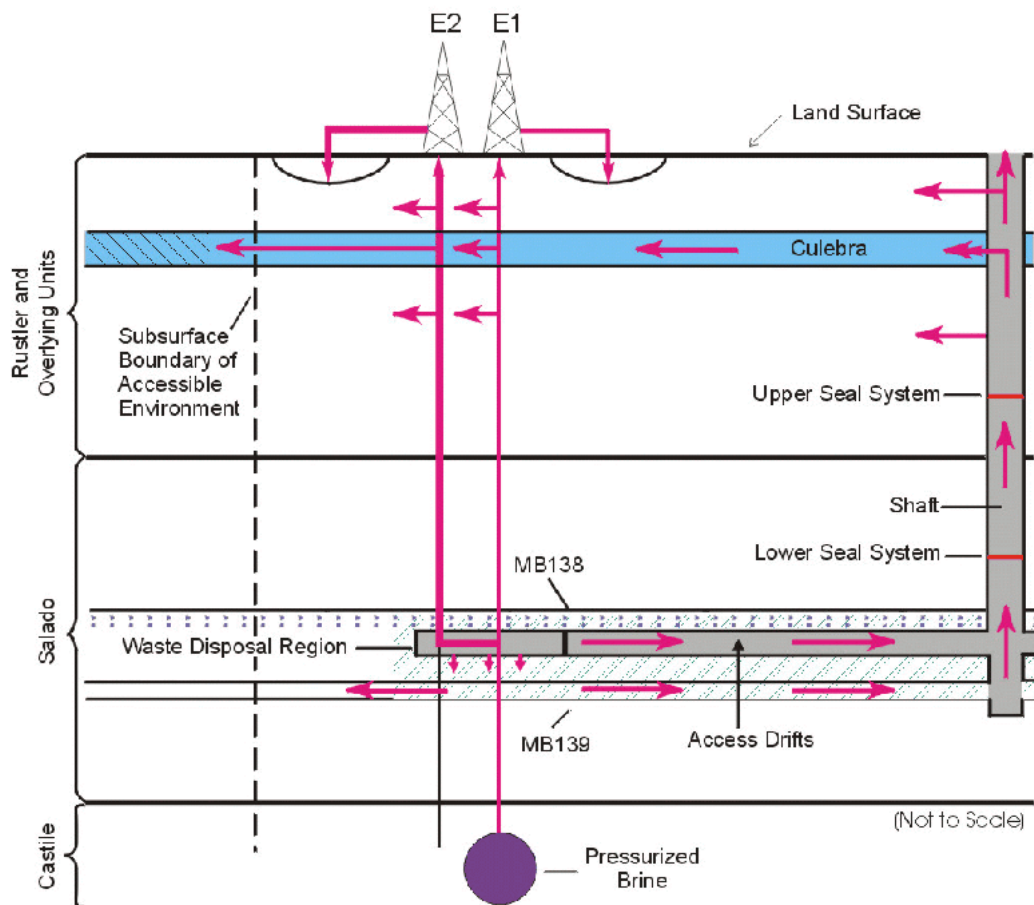


Figure 6-11. Conceptual Release Pathways for the Disturbed Performance Deep Drilling Scenario E1

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Note: Example shown includes only two boreholes, both of which penetrate waste and one of which penetrates pressurized brine in the underlying Castile Formation. Pathways are similar for examples containing multiple boreholes. Arrows indicate hypothetical direction of groundwater flow and radionuclide transport.

- .... Anhydrite layers a and b
- Groundwater flow and radionuclide transport
- █ Repository and shafts
- █ Culebra
- ▨ Disturbed rock zone
- █ Increase in Culebra hydraulic conductivity due to mining

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**Figure 6-12. Conceptual Release Pathways for the Disturbed Performance Deep Drilling Scenario E1E2**

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1 scenarios described in Section 6.3. Additional discussion of conceptual models and modeling  
2 assumptions is provided in Appendix MASS. Additional descriptions of sampled parameter  
3 values are included in Appendix PAR (Parameters 1 to 57).

#### 4 5 **6.4.1 Types of Models**

6  
7 A single modeling system was used to represent the disposal system and calculate the CCDFs  
8 presented in Section 6.5. The modeling system, however, can be conveniently described in  
9 terms of various submodels with each describing a part of the overall system. This section is  
10 organized to provide, for each submodel defined, an integrated, summary description of the  
11 conceptual model, mathematical model, numerical model, computational model, experimental  
12 data, and model parameters used. These terms are described below.

13  
14 The models used in the WIPP performance assessment, as in other complex analyses, exist at  
15 four different levels:

- 16
- 17 (1) **Conceptual models** are a set of qualitative assumptions used to describe a system or  
18 subsystem for a given purpose. At a minimum, these assumptions concern the  
19 geometry and dimensionality of the system, initial and boundary conditions, time  
20 dependence, and the nature of the relevant physical and chemical processes. The  
21 assumptions should be consistent with one another and with existing information within  
22 the context of the given purpose.
  - 23  
24 (2) **Mathematical models** are developed to represent the processes at the site. The  
25 conceptual models provide the context within which these mathematical models must  
26 operate and define the processes they must characterize. The mathematical models are  
27 predictive in the sense that, once provided with the known or assumed properties of the  
28 system and possible perturbations to the system, they predict the response of the  
29 system. The processes represented by these mathematical models include fluid flow,  
30 mechanical deformation, radionuclide transport in groundwater, and removal of waste  
31 through intruding boreholes.
  - 32  
33 (3) **Numerical models** are developed to provide approximations of mathematical model  
34 solutions because most mathematical models do not have closed-form solutions.
  - 35  
36 (4) The complexity of the system requires the use of computer codes to solve the numerical  
37 models. The implementation of the numerical model in the computer code with specific  
38 initial and boundary conditions and parameter values is generally referred to as the  
39 **computational model**.

40  
41 Data are descriptors of the physical system being considered, normally obtained by  
42 experiment or observation. Parameters are values necessary in mathematical, numerical, or  
43 computational models. The distinction between data and parameters can be subtle.  
44 Parameters are distinct from data, however, for three reasons. First, data may be evaluated,  
45 statistically or otherwise, to generate parameters for a model to account for uncertainty in

1 data. Second, some parameters have no relation to the physical system, such as the  
2 parameters in a numerical model specified to determine when an iterative solution scheme has  
3 converged. Third, many model parameters are applied at a different scale than one that can  
4 be directly observed or measured in the physical system. The distinction between data and  
5 parameter values is described further in Appendix PAR, where the derivations of distributions  
6 for specific parameters are given. The interpretation and the scaling of experimental and field  
7 data are discussed in Appendix PAR for individual and sampled parameters, as appropriate.  
8

## 9 **6.4.2 Model Geometries**

10  
11 Although the specific geometries used in performance assessment models are developed after  
12 the conceptual and mathematical models are defined, they are introduced here because they  
13 provide a useful framework for presenting the full discussion of the modeling system.  
14 Performance assessment represents the three-dimensional geometry of the disposal system  
15 (repository, shafts, and controlled area) using two primary two-dimensional simplifications. In  
16 the first two-dimensional geometry, processes that act on the entire disposal system occur  
17 within the repository and are simulated in the BRAGFLO (BRine And Gas FLOW) computer  
18 code using a geometry that approximates a north-south vertical cross section through the  
19 disposal system and some surrounding rock. This geometry is used to simulate processes in  
20 the disposal system, such as two-phase flow and movement of actinides, as well as processes  
21 acting only within the repository, such as creep closure of disposal rooms and gas generation.  
22 In the second two-dimensional geometry, groundwater flow and actinide transport in the  
23 Culebra, which provides a potential pathway for lateral transport of actinides to the accessible  
24 environment, are simulated in the SECOFL2D and SECOTP2D computer codes using a two-  
25 dimensional horizontal geometry that treats the Culebra as a single layer. These two  
26 geometries are discussed in the following sections. Additional geometries used to simulate  
27 system behavior during drilling intrusions are discussed in Sections 6.4.7 and 6.4.13.  
28 Performance assessment codes and the flow of numerical information through the  
29 performance assessment are described in Section 6.4.11 and referenced appendices.  
30

### 31 **6.4.2.1 Disposal System Geometry**

32  
33 A single disposal system geometry is used in the BRAGFLO computational model (see  
34 Appendix BRAGFLO) with four different maps of material properties: one for undisturbed  
35 conditions; one for the E1 intrusion event, in which a borehole penetrates the panel and a  
36 Castile brine reservoir; one for the E2 intrusion event, in which a borehole penetrates the  
37 repository but not a Castile brine reservoir; and one for the E1E2 intrusion event, in which at  
38 least one E1 borehole and one other borehole penetrate a disposal panel (see Section  
39 6.4.13.5). The geometry and material maps used in BRAGFLO are similar; each is a model  
40 for fluid flow calculations that represents the three-dimensional physical system in a two-  
41 dimensional plane that cuts vertically through the repository and surrounding strata. Side  
42 views of the vertical cross section and two of the material maps are presented in Figures 6-13  
43 and 6-14. In these figures, the boundaries of grid blocks discretized in the model (see

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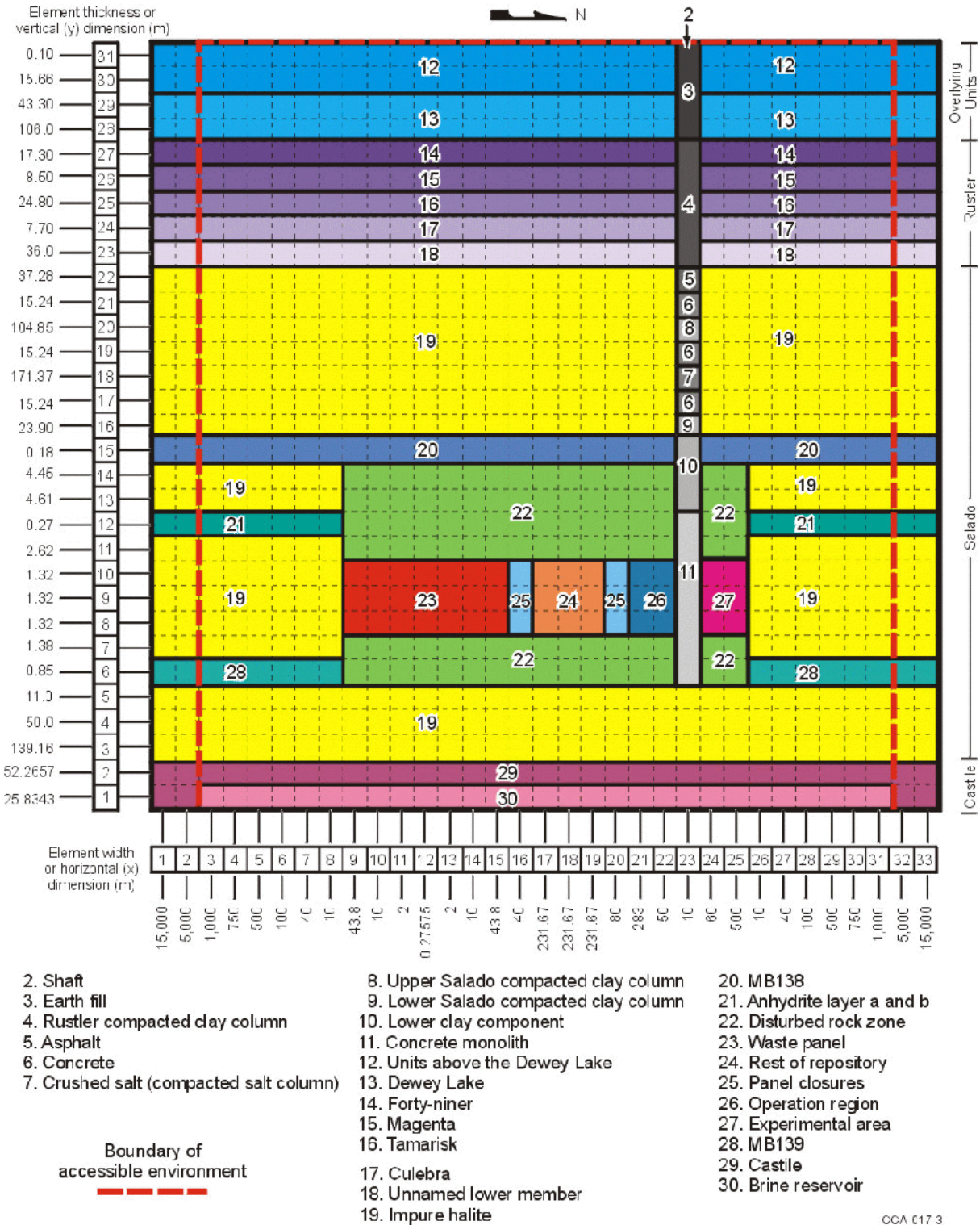


Figure 6-13. A Side View of the BRAGFLO Elements and Material Regions Used for Simulation of Undisturbed Performance

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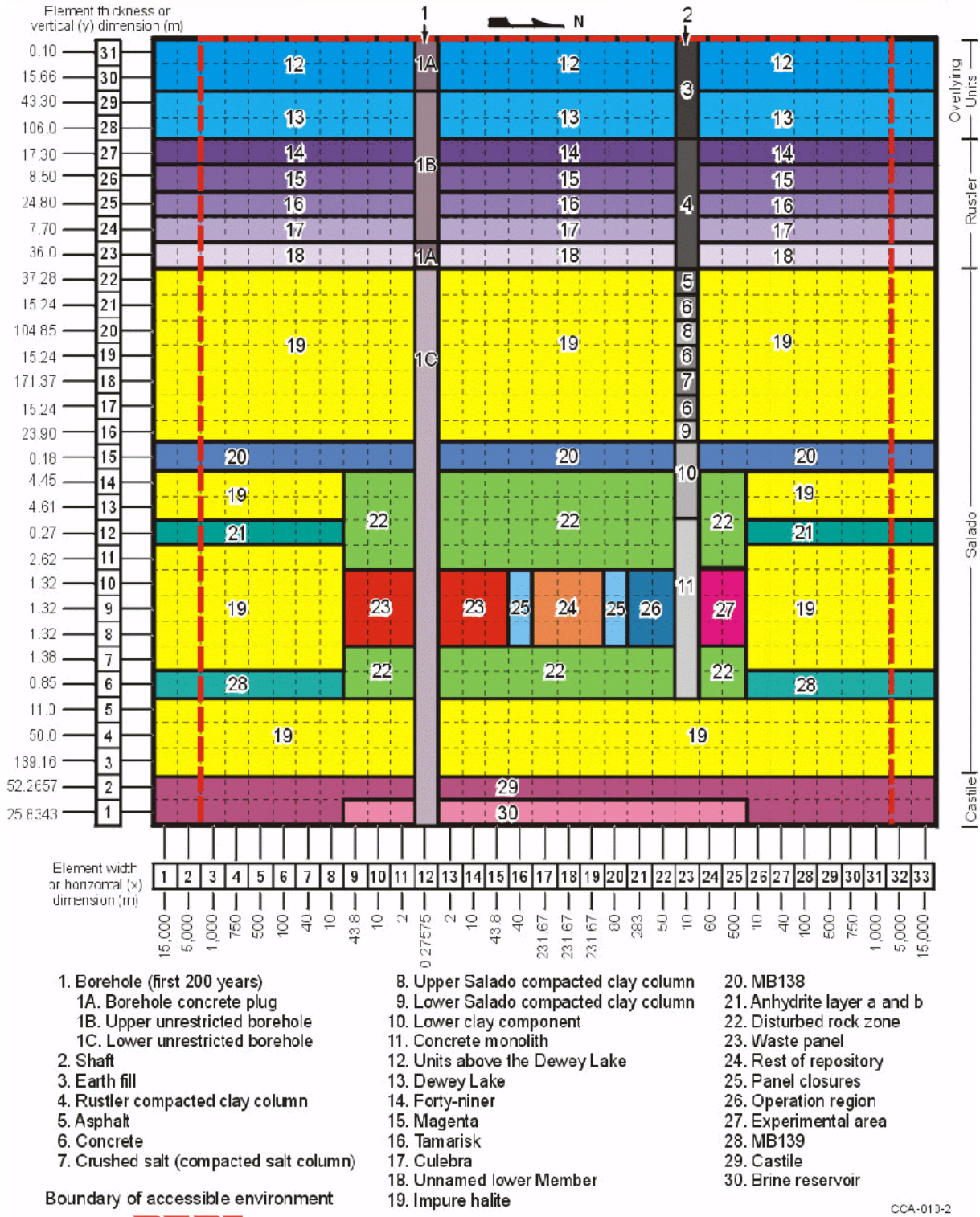


Figure 6-14. A Side View of the BRAGFLO Elements and Material Regions Used to Simulate the E1 Event (For E2 Event, the Borehole Extends Only Between the Surface and the Base of the Repository)

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1 Appendix BRAGFLO, Section 4.5, for details of the finite-difference method) are shown with  
2 dashed lines; each grid block is associated with material properties representing an important  
3 feature of the disposal system. These associations between grid blocks and material properties  
4 are shown by color and number in the figures. The two figures differ in that the material  
5 property map used for E1 intrusion events (Figure 6-14) includes a material region  
6 representing the borehole (Region 1) that is not present in the undisturbed case. The borehole  
7 region vertically transects other material regions and connects the single panel (Region 23)  
8 with the Castile brine reservoir (Region 30), marker beds, overlying units, and the surface.  
9 The E2 intrusion event material regions are similar to those of E1, except that the modeled  
10 borehole region does not extend below the repository and therefore does not contact a brine  
11 reservoir. Additionally, the extent of the Castile brine reservoir is different from undisturbed  
12 to disturbed performance. This difference has no impact on results because no natural FEPs  
13 are retained that can create a pathway from the Castile to the repository.

14  
15 Figures 6-13 and 6-14 show the relationship among material regions in the model and how  
16 connections are made within the finite-difference scheme. However, by illustrating  
17 equidimensional grid blocks, the volumetric relationship between grid blocks is greatly  
18 distorted. To show the volumetric relationship among nodal blocks and between the  
19 repository and host formations, a scaled side view of the vertical cross section used in  
20 BRAGFLO is shown in Figure 6-15. An undistorted 1:1 vertical:horizontal scale side view is  
21 in the upper left corner of Figure 6-15; at this scale, important model features are not  
22 resolvable. Therefore, two other views are provided in which the vertical scale has been  
23 exaggerated 50:1 to show model features. Notice that the modeling system extends more than  
24 15 miles (25 kilometers) to the north and 14 miles (22.5 kilometers) to the south from the  
25 borehole, which intersects the approximate center of the waste disposal region and includes  
26 the uppermost 2,990 feet (911 meters) of rock at the WIPP site. Colors in Figure 6-15 are  
27 consistent with colors for material regions in Figures 6-13 and 6-14.

28  
29 Effects of flow in the third (out-of-plane) dimension are approximated with a two-dimensional  
30 element configuration that simulates convergent or divergent flow to the north and south,  
31 centered on the repository, in intact rocks laterally away from the repository. A top-down  
32 (plan) view of the model is shown in Figure 6-16 and illustrates the discretization adopted to  
33 simulate convergent or divergent flow. Colors in Figure 6-16 are consistent with colors for  
34 material regions in Figures 6-13 through 6-15 at the repository depth (node rows 8, 9, and 10).  
35 In this text, the term width corresponds to the x (lateral) dimension of nodes, thickness refers  
36 to the y (vertical) dimension, and depth refers to the z (out-of-plane) dimension. The effects  
37 of the grid assumptions on fluid flow processes in the Salado are discussed in Appendix MASS  
38 (Section MASS.4 and MASS Attachment 4-1).

39  
40 Based on observations in the existing excavations, the DOE approximates the regionally  
41 variable dip in the Salado by incorporating a 1-degree dip to the south in the BRAGFLO  
42 computational mesh. This dip is not indicated in Figures 6-13, 6-14, and 6-15.

43  
44 The BRAGFLO definition of hydrostratigraphic units follows formation and member  
45 divisions. Inside the Salado, however, further subdivision of hydrostratigraphy has been made

1 based on the observed differences in permeability between anhydrite-rich interbeds and  
2 halite-rich intervals. This further subdivision has been made only at elevations near the  
3 repository horizon because only in this region are such distinctions important. The models and  
4 assumptions used to represent the various regions of material properties shown in Figures 6-13  
5 and 6-14 are discussed beginning in Section 6.4.3 and in Appendices MASS and PAR. The  
6 thickness of hydrostratigraphic units used in BRAGFLO are tabulated in Appendix PAR  
7 (Table PAR-57).  
8

#### 9 6.4.2.2 Culebra Geometry

10 Although the BRAGFLO model contains a discretization of the Culebra and calculates flow  
11 there, the DOE uses a more detailed representation of this unit to estimate potential  
12 radionuclide releases to the accessible environment resulting from lateral subsurface transport.  
13 The conceptual model for flow and transport in this geometry is discussed in Section 6.4.6.2.  
14 The boundary and initial conditions applied to this geometry are discussed in Section 6.4.10.2.  
15 SECOFL2D and SECOTP2D are the computer codes used to simulate groundwater flow and  
16 radionuclide transport in the Culebra. The manner in which this geometry is linked to the  
17 BRAGFLO geometry described in the preceding section is discussed in Sections 6.4.6.2,  
18 6.4.11, and Appendix CODELINK (Section CODELINK.6). The grids used for modeling the  
19 Culebra are discussed in Section 6.4.6.2.  
20  
21

### 22 6.4.3 The Repository

23 The repository, as shown in Figure 3-2 (see Chapter 3.0), is represented by Regions 23 to 27  
24 in Figures 6-13 and 6-14. These regions include a waste disposal panel (Region 23), panel  
25 closures (Region 25), the panels and access drifts in the rest of the waste disposal region  
26 (Region 24), the operations region (Region 26), and the experimental region at the north end  
27 of the repository (Region 27). The shaft (Region 2, which is further subdivided into Regions 3  
28 through 11) intersects the repository between the operations region and the experimental  
29 region. The shaft is discussed in detail in Section 6.4.4. For human-intrusion events, the  
30 borehole (Region 1) intersects the waste disposal region in the panel. In two-dimensional fluid  
31 flow codes, a grid block's length, volume, and cross-sectional area of faces connected to other  
32 grid blocks are important model features. For each region of the repository depicted, the  
33 BRAGFLO model geometry preserves the true excavated volume. Lateral dimensions have  
34 been determined to preserve volume and retain important cross-sectional areas and distances  
35 between defined regions, as discussed below. These simplifications are conservative with  
36 respect to fluid contact with waste, which is a critical factor in determining the quantity of  
37 actinides mobilized in the aqueous phase. The simplifications are conservative because (1) all  
38 pillars have been removed from the modeled panel, resulting in homogeneous waste regions  
39 through which fluid can flow directly; and (2) the panels in the rest of the repository have  
40 neither pillars nor closures, resulting in a large homogeneous region that is assigned an average  
41

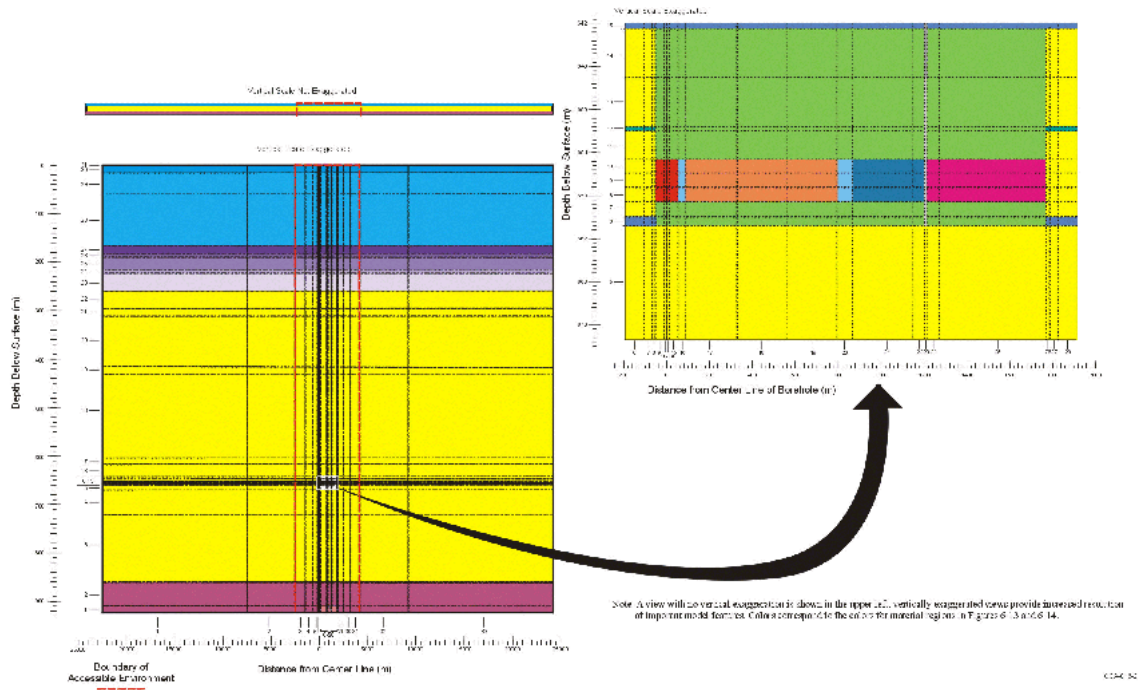
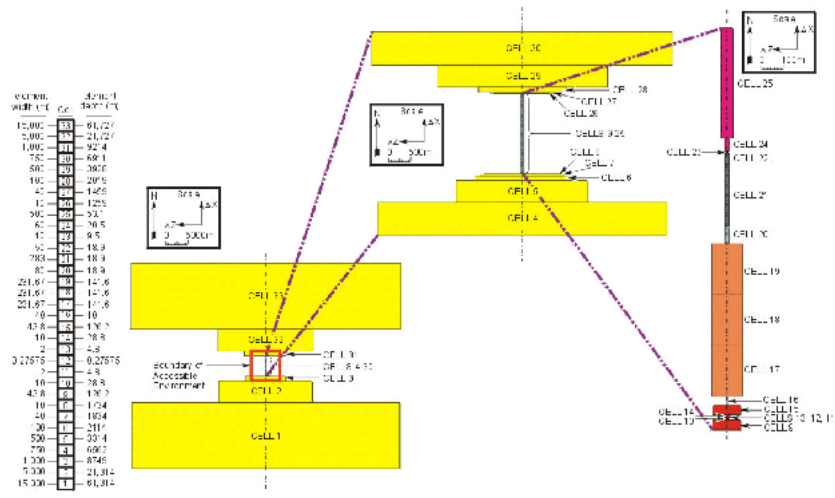


Figure 6-15. A Side View of the BIGAGFLO Geometry Drawn to Scale 1:1 and for this Performance Assessment

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Note: This view illustrates the variation in element depth present in the model for simulation of radially convergent flow.

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Figure 6-16. A Top-Down View of a Row of Elements in BRAGFLO Used for Undisturbed Performance

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1 permeability within the range of experimentally determined permeabilities (see Section 6.4.3.2  
2 and Appendix MASS, Section MASS.5).

3  
4 The single panel that is represented individually (Region 23) is discretized to simulate radial  
5 flow to and from the borehole that intersects it. The true distance from the south end of the  
6 waste disposal region to the waste handling shaft is preserved in the model as the distance  
7 from the south end of the modeled panel to the modeled single shaft. In BRAGFLO, the  
8 single panel region is the southernmost portion of the repository. It occupies this position  
9 because separate modeling activities indicate that slightly larger releases may result from a  
10 panel in this position than from alternative placements (see Vaughn et al. 1995).

11  
12 The panel closure between the panel and the rest of the repository has a cross-sectional area  
13 equal to the cross-sectional area of the drifts between panels. The length and total volume of  
14 modeled panel closures is consistent with their design. The panel closure between the rest of  
15 the repository and the operations region has a cross-sectional area equal to the cross-sectional  
16 area of the drifts between the north end of the waste disposal region and the operations  
17 region. Because there are two closures between the waste disposal region and the shafts in  
18 the operations region, the modeled panel closures between the rest of the repository and the  
19 operations region have a length and volume consistent with two panel closures.

20  
21 A number of submodels have been defined within the repository region and are described in  
22 this section. The submodels that have been defined for repository processes are Creep  
23 Closure (6.4.3.1), Repository Fluid Flow (6.4.3.2), Gas Generation (6.4.3.3), Chemical  
24 Conditions in the Repository (6.4.3.4), Dissolved Actinide Source Term (6.4.3.5), and Source  
25 Term for Colloidal Actinides (6.4.3.6).

#### 26 27 6.4.3.1 Creep Closure

28  
29 Salt creep occurs naturally in the Salado halite in response to deviatoric stress. Inward creep  
30 of rock and the repository response is a process generally referred to as creep closure. Creep  
31 closure of excavated regions begins immediately because of excavation-induced deviatoric  
32 stress. If the rooms were empty, closure would proceed to the point where the void volume  
33 created by the excavation would be eliminated as the surrounding formation returns to a  
34 uniform stress state. In the waste disposal region, waste consolidation will continue until  
35 loading in the surrounding rock is uniform, at which point salt creep ceases. The amount of  
36 waste consolidation that occurs and the time it takes to consolidate are governed by properties  
37 of the waste (waste strength, modulus, etc.), properties of the surrounding rock, the  
38 dimensions and location of the room, and the quantities of fluids present in the room.

39  
40 Fluids that could affect closure are brine that may enter the repository from the Salado or an  
41 intrusion borehole, air present in the repository when it is sealed, and gas produced by  
42 reactions occurring during waste degradation. Closure and consolidation can be slowed by  
43 fluid pressure in the repository. This can be quantified according to the principle of effective  
44 stress:

$$\sigma_T = \sigma_c + p, \quad (11)$$

where  $\sigma_T$  is the stress caused by the weight of the overburden (an essentially constant value),  $p$  is the pressure of the repository pore fluid, and  $\sigma_c$  is the stress that is applied to the waste matrix. In this formulation, the waste is considered a skeleton structure containing pore fluids. As the pore pressure increases, an increasing amount of overburden stress is supported by pore fluid pressure,  $P$ , and less overburden stress is supported by the strength of the waste matrix. Waste consolidation will cease when the sum of the stresses felt by the waste matrix and fluid pressure reaches lithostatic pressure. If gas and brine quantities in the repository stabilize, creep closure will act to establish a constant pressure and pore volume.

In summary, creep closure of waste disposal areas will cause their volume to decrease as the Salado deforms to consolidate and encapsulate the waste, changing waste porosity and permeability. Resistance to creep closure will be caused by waste strength and fluid pressure.

Three major material-response models are required for closure analyses. The first model describes how the halite creeps as a function of time and stress. The second model describes the state of consolidation of the waste as a function of applied stress. A third constitutive model is used to model inelastic behavior of anhydrite marker beds (see Appendix PORSURF, PORSURF Attachment 1).

Halite deformation is predicted using a multimechanism deformation steady-state creep model with work hardening and recovery transient response. For the conditions of the WIPP, creep mechanisms are governed by the temperature and shear stress at a given location in the surroundings at any time. Although WIPP conditions are expected to be nearly isothermal at the ambient natural underground temperature, several of the mechanisms can be active at the same time because of the large range of stress states that occur around underground rooms and shafts. The focus of the mechanistic part of the model is definition of steady-state creep strain, with transient creep strain described through a multiplier on the steady-state rate, thus accommodating both transient changes in stress loading and unloading.

The volumetric plasticity model is the mathematical model for room closure and waste consolidation. The experimental data used in this model are summarized and interpreted in Butcher et al. (1991, 65 – 76) and Luker et al. (1991).

The volumetric plasticity model, multimechanism deformation model, and the inelastic constitutive model for anhydrite were numerically implemented in the SANTOS computer code to calculate the closure of disposal rooms for performance assessment (Appendix PORSURF, PORSURF Attachment 1). SANTOS is described in Appendix PORSURF (Section PORSURF.3).

As a boundary condition, SANTOS requires estimates of the fluid pressure and hence the quantity of gas present in a disposal room. These estimates are obtained using the average stoichiometry model of gas generation (Section 6.4.3.3) with different rates of gas generation that reflect different assumptions about the quantity of brine that might be available in a waste

1 disposal room. The different rates of gas generation used in SANTOS bound the possible  
2 conditions for gas content in the repository. With the volumetric plasticity model and the  
3 fluid pressure boundary condition, SANTOS calculates the pore volume of the disposal room  
4 through time.

5  
6 In performance assessment, the time-dependent effects on volume of creep closure calculated  
7 by SANTOS are linked to the fluid-flow code BRAGFLO by a porosity surface, which is a  
8 look-up table relating porosity (void volume) to (1) time after sealing and (2) gas pressure. At  
9 the beginning of a time step, BRAGFLO evaluates the pressure of a cell in the waste disposal  
10 regions; the pressure is sensitive to brine and gas flow and the previous pore volume of the  
11 cell. The code then consults the porosity surface to find the void volume of the cell  
12 appropriate for a given time and pressure. The void volume in the cell is iteratively adjusted  
13 during a time step for consistency with gas generation, fluid movement, and repository  
14 pressure. Additional details about the porosity surface method are included in Appendix  
15 BRAGFLO (Section 4.11) and Appendix PORSURF (Sections PORSURF.1, PORSURF.2, and  
16 PORSURF Attachments 1 through 6). The porosity surface method of incorporating the  
17 dynamic effect of creep closure in performance assessment has been compared to more  
18 complex techniques that are computationally impractical in a performance assessment (Freeze  
19 et al. 1995). In these comparisons, the porosity surface method was found to be a reasonable  
20 representation of behavior observed in more complex models.

21  
22 The operations area and experimental area (Regions 26 and 27 in Figures 6-13 and 6-14,  
23 respectively) are modeled as unfilled after closure in this performance assessment. These  
24 regions are expected to close in less than 200 years and do not require a porosity surface, in  
25 contrast to the region containing waste (Vaughn et al. 1995).

#### 26 27 6.4.3.2 Repository Fluid Flow

28  
29 Fluid flow modeling within the repository is concerned with (1) fluid flow and distribution in  
30 the waste, (2) fluid flow to and from the Salado and shafts, and (3) fluid flow between the  
31 repository and intrusion boreholes. These are important in assessing gas generation rates  
32 (Section 6.4.3.3), repository pressure, and the mobility of radionuclides in the disposal system.  
33 Additional discussion of this topic is provided in Appendix MASS (Section MASS.7).

34  
35 Disposal region fluid flow is affected by the geometrical association of pillars, rooms, drifts,  
36 panel closures, possible borehole locations, the time-dependent properties of waste areas  
37 resulting from creep closure, flow interactions with other parts of the disposal system, and  
38 reactions that generate gas. As described in Section 6.4.3.1, creep closure changes disposal  
39 region porosity. Depending on material properties and conditions, brine may flow into the  
40 disposal region by moving down shafts and through the DRZ or operations region, or during  
41 disturbed conditions, through a borehole. Brine contained in the Salado may flow to the waste  
42 disposal region because of pressure gradients created by the excavation. Brine flow into the  
43 repository may be reduced as repository pressure increases, and brine may be expelled from  
44 the repository if pressure in the repository exceeds brine pressure in the immediately  
45 surrounding rock or borehole. Gas may be generated as waste decomposes, causing a

1 pressure increase. Gas may flow away from the waste into lower pressure areas, which may  
2 include disturbed areas surrounding the repository, the interbeds, the shafts, or an intrusion  
3 borehole. Gas flow into intact, halite-rich rock is not expected because of the expected high  
4 threshold pressure of halite (see Section 6.4.5.1).

5  
6 Fluid flow in the disposal system is conceptualized using principles of multiphase flow, except  
7 for Culebra flow and transport modeling. In multiphase flow, a residual brine saturation ( $S_{br}$ ),  
8 is defined, which is the minimum saturation at which the brine phase has a nonzero relative  
9 permeability; below this saturation brine is immobile. In accordance with two-phase flow  
10 theory, the residual gas saturation ( $S_{gr}$ ) in the disposal system corresponds to the gas saturation  
11 necessary to create an incipient gas-phase relative permeability; below this saturation waste-  
12 generated gas is immobile. The multiphase flow techniques adopted by the DOE are  
13 described in Appendix BRAGFLO (Section 4.8).

14  
15 The intrinsic permeability of waste at a given time can influence repository system  
16 performance by affecting the flow rate of gas or brine through the waste. Tests reported by  
17 Luker et al. (1991, 693 – 702) on simulated waste have shown material permeabilities from  
18 about  $10^{-12}$  to  $10^{-16}$  square meters on waste compacted under a lithostatic load. Performance  
19 assessment assigns a permeability of the waste as a constant at  $1.7 \times 10^{-13}$  square meters  
20 (Table 6-8). This permeability value is representative of the average value of compacted  
21 waste. Use of a constant value rather than a variable has been found acceptable (Vaughn et  
22 al. 1995).

23  
24 Because two-phase relationships have not been measured for waste, performance assessment  
25 determines a range of possible two-phase conditions for the repository by applying the LHS  
26 technique to parameters within the Brooks-Corey two-phase equations. These and other  
27 parameters in the disposal room and repository flow model are shown in Tables 6-8 and 6-9.  
28 Details about the two-phase equations and parameters used in performance assessment are  
29 included in Appendix BRAGFLO (Sections 4.8 and 4.9) and Appendix PAR (Parameters 6  
30 and 7).

31  
32 Material properties in the waste are assumed to be homogeneous and are distributed in the  
33 BRAGFLO model in cells whose volumes are much larger than an individual waste container.  
34 Two processes that may occur on scales smaller than the cell volumes in BRAGFLO are  
35 wicking (the retention of brine in a capillary fringe) and puddling (the capture of brine in  
36 isolated pockets of waste caused by waste heterogeneity). Wicking is accounted for in the gas  
37 generation model (Section 6.4.3.3). Vaughn et al. (1995) found that puddling can be  
38 neglected.

**Table 6-8. Repository<sup>a</sup> and Panel Closures Parameter Values**

Parameter (units)	Maximum	Minimum	Median or Constant
Permeability, k (square meters) - Waste Region	-	-	$1.70 \times 10^{-13}$
Permeability, k (square meters) - Operations and Experimental Regions	-	-	$10^{-11}$
Permeability (square meters) - Panel Closures	-	-	$10^{-15}$
Initial Effective Porosity (percent) - Waste Region	-	-	84.8
Effective Porosity (percent) - Operations and Experimental Regions	-	-	18.0
Effective Porosity (percent) - Panel Closures	-	-	7.5
Threshold Pressure, $P_t$ (pascals) - Repository <sup>a</sup>	-	-	0
Threshold Pressure, $P_t$ (pascals) - Panel Closures <sup>b</sup>	-	-	$8.67 \times 10^4$
Residual Brine Saturation, $S_{br}$ (unitless) - Repository	0.552	0	0.276
Residual Brine Saturation, $S_{br}$ (unitless) - Operations and Experimental Regions	-	-	0
Residual Brine Saturation, $S_{br}$ (unitless) - Panel Closures	-	-	0.20
Residual Gas Saturation, $S_{gr}$ (unitless) - Repository	0.15	0	0.075
Residual Gas Saturation, $S_{gr}$ (unitless) - Operations and Experimental Regions	-	-	0
Residual Gas Saturation, $S_{gr}$ (unitless) - Panel Closures	-	-	0.20
Pore Distribution Parameter, $\lambda$ (unitless) - Repository	-	-	2.89
Pore Distribution Parameter, $\lambda$ (unitless) - Operations and Experimental Regions	-	-	0.7
Pore Distribution Parameter, $\lambda$ (unitless) - Panel Closures	-	-	0.94
Maximum Capillary Pressure (pascals) - Repository and Panel Closures	-	-	$10^8$
Pore Compressibility (1/pascals) - Repository <sup>c</sup>	-	-	0
Pore Compressibility (1/pascals) - Panel Closures	-	-	$2.64 \times 10^{-9}$

<sup>a</sup> Unless specifically listed, Repository refers to operations, experimental, and waste regions.

<sup>b</sup> Threshold pressure ( $P_t$ ) determined from the relationship:  $P_t = PCT\_A \cdot k^{PCT\_EXP}$  where PCT\_A and PCT\_EXP are constants and k is the permeability.

<sup>c</sup> Accounted for in porosity surface.

**Table 6-9. BRAGFLO Fluid Properties**

Parameter (units)	Value
Reference Temperature (kelvin) <sup>a</sup>	300.15
Liquid Density (kilograms per cubic meter) <sup>a,b</sup> at	
• Atmospheric Pressure	1,220.0
• 8 megapascals	1,223.0
• 15 megapascals	1,225.7
Liquid Viscosity (pascals * seconds) <sup>b</sup>	$2.1 \times 10^{-3}$
Liquid Compressibility (1/pascals) <sup>b</sup>	$3.1 \times 10^{-10}$
Gas Density (kilograms per cubic meter) <sup>a,b</sup> at:	
• Atmospheric Pressure	0.0818
• 8 megapascals	6.17
• 15 megapascals	11.1
Gas Viscosity (pascals * seconds) <sup>b</sup>	$8.93 \times 10^{-6}$

<sup>a</sup> These values applied to fluids in all material regions in BRAGFLO.

<sup>b</sup> See Appendix BRAGFLO (Section 4.4) for equations of state.

The experimental and operations regions (Regions 26 and 27 in Figures 6-13 and 6-14) are represented in performance assessment with a porosity of 18.0 percent and a permeability of  $10^{-11}$  square meters as a conservative upper bound. For postoperational performance, the panel closures (Region 25 in Figures 6-13 and 6-14) are represented with a porosity of 7.5 percent and a permeability of  $10^{-15}$  square meters, as discussed in Appendix MASS (MASS Attachment 7-1).

#### 6.4.3.3 Gas Generation

Gas will be produced in the repository because of a variety of chemical reactions, primarily those occurring between brine, metals, microbes, cellulose and similar materials, plastics, and rubber materials, and via liberation of dissolved gases to the gas phase. The dominant processes are anoxic corrosion of metals in the waste containers and the waste and microbial degradation of cellulose, plastics, and rubbers in the waste. Anoxic corrosion reactions will occur between brine and steel, aluminum, and aluminum alloys, producing H<sub>2</sub>. Microbial degradation of cellulose may produce a variety of gases; however, for the waste inventory and expected conditions, CO<sub>2</sub> and CH<sub>4</sub> (methane) are expected to be the dominant gases for the process. Radiolysis has been demonstrated by laboratory experiment and model calculations to be insignificant (see Appendix MASS, Section MASS.8; Appendix SCR, Section SCR.2.5.1.3).

Gas generation will affect repository pressure, which is important in other submodels of the disposal system, such as those calculating creep closure (Section 6.4.3.1), interbed fracturing (Section 6.4.5.2), two-phase flow (Section 6.4.3.2), and the radionuclide release associated

1 with spillings during an inadvertent drilling intrusion (Section 6.4.7). Thus, gas generation  
2 must be estimated in performance assessment.

3  
4 Performance assessment uses the average stoichiometry model to estimate gas generation  
5 occurring in the waste disposal region. This model was developed for WIPP performance  
6 assessment based on gas generation experiments performed for the WIPP (see Appendix  
7 MASS, Section MASS.8 and MASS Attachment 8-2). The average stoichiometry model  
8 accounts for the formation of gas by anoxic corrosion of steels and microbial degradation of  
9 cellulose, including plastics and rubbers. For the purpose of calculating repository pressure  
10 and gas flow, the density and viscosity of the generated gas are assumed to be those of H<sub>2</sub>. In  
11 the average stoichiometry model, gas is assumed to be generated at a rate dependent on the  
12 availability of brine in the computational cell. Gas can be generated by anoxic corrosion in all  
13 realizations, and is assumed to be generated by microbial degradation in half of the  
14 realizations. The average stoichiometry model is based on experimental data on the rates of  
15 corrosion and microbial degradation under inundated and humid conditions. These data were  
16 used to develop ranges of possible gas-generation rates, as shown in Table 6-10. In  
17 BRAGFLO, a gas-generation rate is determined from the rates listed in Table 6-10 by a linear  
18 interpolation method that combines humid and inundated rates based on the effective liquid  
19 saturation (Appendix BRAGFLO, Section 4.13). The effective liquid saturation in a  
20 computational cell in BRAGFLO for the purpose of gas generation is the computed liquid  
21 saturation in that cell, plus an adjustment to account for uncertainty in the capillary rise  
22 (wicking) characteristics of the waste. Refer to Appendices PAR (Parameter 8) and  
23 BRAGFLO (Sections 4.13 and 7.2.9) for details on the treatment of wicking in the gas  
24 generation model.

25  
26 Anoxic corrosion is represented by a generic equation given in Appendix BRAGFLO (Section  
27 4.13). This equation accounts for corrosion only of the steel content in the repository by the  
28 reaction expected to dominate. Because the total quantity of aluminum and aluminum alloys  
29 is a small compared to the quantity of iron base metals, corrosion of aluminum is omitted for  
30 simplicity. The steel content of the repository is depleted separately in each computational  
31 cell (that is, a cell-by-cell basis), and gas generation can continue in cells, depending on  
32 parameter values, until all steel in a cell is consumed. Brine in cells is consumed as gas  
33 generation proceeds. If a cell has a brine saturation equal to zero, it cannot produce gas by  
34 anoxic corrosion.

35  
36 It is assumed that there is no passivation of anoxic corrosion of steel by CO<sub>2</sub> and H<sub>2</sub>S  
37 produced by microbial degradation because microbial gas generation is too slow and also  
38 because CO<sub>2</sub> will be removed from the gaseous phase by reaction with MgO backfill. Details  
39 of the equations and parameter values are given in Appendix BRAGFLO (Section 4.13),  
40 Appendix PAR (Parameter 1), and Appendix MASS (Section MASS.8).

41  
42 Microbial degradation occurs in only half of the realizations because of uncertainties in  
43 viability of the microbial colonies (Appendix MASS, Section MASS.8 and MASS Attachment  
44 8-2). Like anoxic corrosion, microbial degradation is represented by a generic

**Table 6-10. Average-Stoichiometry Gas Generation Model Parameter Values**

Parameter (units)	Maximum	Minimum	Median or Constant
Inundated Corrosion Rate for Steel without CO <sub>2</sub> Present (meters per second)	$1.59 \times 10^{-14}$	0	$7.94 \times 10^{-15}$
Humid Corrosion Rate for Steel	-	-	0
Probability of Microbial Degradation of Plastics and Rubbers in the Waste in the Event of Significant Microbial Gas Generation (see figure PAR-1) where 0 represents corrosion and no significant microbial gas generation, 1 represents cellulosic degradation only, and 2 represents cellulosic, plastic, and rubber degradation	2	0	2
Rate for Microbial Degradation Under Humid Conditions (mole per kilogram* second)	$1.27 \times 10^{-9}$	0	$6.34 \times 10^{-10}$
Rate for Microbial Degradation under Brine-Inundated Conditions (mole per kilogram* second)	$9.51 \times 10^{-9}$	$3.17 \times 10^{-10}$	$4.92 \times 10^{-9}$
Factor $\beta$ for Microbial Reaction Rates (unitless)	1.0	0	0.5
Anoxic Corrosion Stoichiometric Factor X (unitless)	-	-	1.0
Average Density of Cellulosics in CH Waste (kilograms per cubic meter)	-	-	54.0
Average Density of Cellulosics in RH Waste (kilograms per cubic meter)	-	-	17.0
Average Density of Iron-Based Materials in CH Waste (kilograms per cubic meter)	-	-	170.0
Average Density of Iron-Based Materials in RH Waste (kilograms per cubic meter)	-	-	100.0
Average Density of Plastics in CH Waste (kilograms per cubic meter)	-	-	34.0
Average Density of Plastics in RH Waste (kilograms per cubic meter)	-	-	15.0
Average Density of Rubber in CH Waste (kilograms per cubic meter)	-	-	10.0
Average Density of Rubber in RH Waste (kilograms per cubic meter)	-	-	3.3
Bulk Density of Iron Containers, CH Waste (kilograms per cubic meter)	-	-	139.0
Bulk Density of Iron Containers, RH Waste (kilograms per cubic meter)	-	-	$2.59 \times 10^3$

**Table 6-10. Average-Stoichiometry Gas Generation Model Parameter Values (Continued)**



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Parameter (units)	Maximum	Minimum	Median or Constant
Bulk Density of Plastic Liners, CH Waste (kilograms per cubic meter)	-	-	26.0
Bulk Density of Plastic Liners, RH Waste (kilograms per cubic meter)	-	-	3.1
BIR Total Volume of CH Waste (cubic meters)	-	-	$1.69 \times 10^5$
BIR Total Volume of RH Waste (cubic meters)	-	-	$7.08 \times 10^3$
Wicking Saturation (unitless)	1.0	0	0.5

equation, given along with other details in Appendix BRAGFLO (Section 4.13). The cellulose inventory is depleted on a cell-by-cell basis. Depending on parameter values, gas generation by microbial degradation can continue until all cellulose in the cell are degraded. Reaction with MgO added to the repository consumes CO<sub>2</sub> (see Section 6.4.3.4 and Appendix SOTERM, Section SOTERM.2.2.2). Thus, the net quantity of gas developed by microbial degradation is correlated with constituents of the waste disposal region. Details are provided in Appendix BRAGFLO (Section 4.13). It is assumed that the microbial degradation process neither produces nor consumes water, but its rate is dependent on the amount of liquid present in a computational cell.

Microbial degradation may consume plastic and rubber materials in the repository. The DOE assumes that in half of those simulations in which microbial degradation of cellulose occurs, microbial degradation also acts on plastic and rubber materials in the waste disposal region. As with cellulose, these materials are depleted on a cell-by-cell basis. Parameter values for the average stoichiometry model are summarized in Table 6-10 and detailed in Appendix PAR (Parameters 1 through 5).

**6.4.3.4 Chemical Conditions in the Repository**

The chemical conditions in the repository determine actinide solubility, a property demonstrated in past analyses as important to disposal system performance. In scenarios that have the potential to result in releases to the accessible environment, the DOE has determined that chemical conditions in the repository can be modeled as constant in performance assessment. This use of constant conditions is based on an assumption of equilibrium for most processes between the brine in the repository (determined by the scenario being considered), waste, MgO backfill, and abundant minerals. Some exceptions to the equilibrium assumption are present in some performance assessment models and are discussed where appropriate. In addition to the following discussion, information supporting this position is presented in Appendix SOTERM.

Brine and waste within the WIPP repository are modeled as a uniform mixture of dissolved and solid-state species. Thermodynamic equilibrium is assumed for dissolved actinide

1 concentrations, but oxidation-reduction reactions between the actinides and other waste  
2 components are not assumed to proceed to equilibrium. Although materials in the waste will  
3 actually dissolve at different rates, the presumption of homogeneity and solubility equilibrium,  
4 along with assumed disequilibrium reduction-oxidation conditions, yields the largest  
5 reasonable concentration of aqueous actinides in the repository. No chemical  
6 microenvironments that influence the overall chemical environment are expected to persist,  
7 nor is supersaturation expected during the 10,000-year regulatory period. The average  
8 temperature of the WIPP is expected to increase by less than 6°C as a result of radioactive  
9 decay and exothermic reactions, such as MgO hydration and carbonization, and the effect of  
10 this small increase is assumed negligible (see Appendix WCA, Section WCA.5.3, and  
11 Appendix SCR, Sections SCR.2.2.2 and SCR.2.5.7).

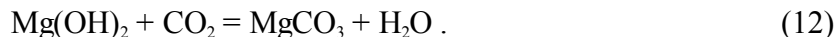
12  
13 Brine composition in the repository can vary depending on the sequence of future human  
14 events. Calculating mixing of brine from different sources is not amenable to performance  
15 assessment. The DOE has made the reasonable simplification that in the undisturbed  
16 performance and E2 scenarios, which do not include penetration of a Castile brine reservoir,  
17 all brine in the repository will have the composition of Salado brine (see Appendix SOTERM,  
18 Section SOTERM.2.2.1). In these scenarios, there is no process that could introduce Castile  
19 brine into the repository. For the E1 and E1E2 scenarios, which include penetration of a brine  
20 reservoir in the Castile, brine in the repository is assumed to have the composition of Castile  
21 brine at all times. Even though some Salado brine may enter the repository in these scenarios,  
22 it is reasonable to assume that Castile brine is the dominant portion of brine because the  
23 quantity of brine that can flow from a reservoir through a borehole and into the repository is  
24 substantial compared to the quantity of brine entering from the Salado.

25  
26 The chemical environment in the repository after closure is expected to be reducing (that is,  
27 lowered oxidation states are expected to be favored). Any gaseous or dissolved oxygen  
28 present in the repository will be consumed quickly either by aerobic microbes or by oxic  
29 corrosion after repository closure. Moreover, the repository will contain large amounts of  
30 iron, and anoxic corrosion has been shown to produce considerable quantities of hydrogen gas  
31 and Fe<sup>2+</sup> under expected repository conditions (see Appendix MASS, MASS Attachment 8-3).  
32 Despite the overall reducing conditions, however, a condition of reduction-oxidation  
33 disequilibrium is assumed in that reduction-oxidation reactions between dissolved actinides in  
34 possible oxidation states are assumed to not occur.

35  
36 Based on experimental data reported in Appendix SOTERM (Sections SOTERM.2.2.2,  
37 SOTERM.3.4, and SOTERM.3.6), the DOE has determined that alkaline conditions in the  
38 repository favor lower actinide solubility. As discussed in Section 3.3.3 and Appendix BACK,  
39 MgO will be emplaced in the repository with the waste, in order to ensure alkaline conditions  
40 in the repository. MgO emplaced with the waste will react with the CO<sub>2</sub> that forms, creating  
41 magnesium carbonate minerals such as MgCO<sub>3</sub>. The fugacity of CO<sub>2</sub> will be low and  
42 controlled by equilibrium considerations, rather than controlled by its rate of production by  
43 microbial degradation, because the DOE will emplace enough MgO with sufficient surface  
44 area to ensure CO<sub>2</sub> uptake will exceed the CO<sub>2</sub> production rate. Thus, by adding MgO to the  
45 repository, the DOE not only maintains alkaline conditions but also minimizes a property of

1 the repository, its CO<sub>2</sub> fugacity, that would be expected to vary with time and potentially  
2 complicate the estimation of actinide solubilities in performance assessment.

3  
4 MgO reacts with brine to form Mg(OH)<sub>2</sub>. Mg(OH)<sub>2</sub> will react with CO<sub>2</sub> produced by the  
5 microbial degradation of cellulose by reactions such as



7  
8  
9 There is a small amount of other alkaline components in the waste, such as Ca(OH)<sub>2</sub>,  
10 contained in the cementitious waste. Their effect will be minimal because they will be  
11 consumed by reactions with MgCl<sub>2</sub> in the Salado brine and microbially generated CO<sub>2</sub>. Details  
12 of those buffering reactions are described in Appendix SOTERM (Section SOTERM.2.2.2).

13  
14 Because the processes that might cause time-dependent changes in important chemical  
15 conditions in the repository have been eliminated by the addition of MgO and by the  
16 assumptions made regarding brine composition, performance assessment uses constant  
17 chemical conditions. The chemical conditions in the repository, including the pmH (the  $-\log_{10}$   
18 of the molality of the hydrogen ion), are assumed to be controlled by equilibrium between  
19 minerals (that is, MgO, Salado halite, and anhydrite present in interbeds), brine present, and  
20 waste. In Salado brine, the pmH in this system will be about 9.4. In Castile brine, the pmH in  
21 this system will be about 9.9. In both systems, the carbon dioxide fugacity will be low and  
22 will be determined by the equilibrium system (see Appendix SOTERM, Section  
23 SOTERM.2.2.2, for a detailed discussion).

24  
25 The waste contains chemical compounds, known as organic ligands, that can enhance the  
26 concentration of actinide ions by forming soluble complexes of these ions. The ligands of  
27 concern in the repository are acetate, citrate, oxalate, and ethylenediaminetetraacetate  
28 (EDTA) because they are soluble in brine and are known to be present in the waste (see WCA  
29 Section 8.11). However, these organic ligands also bond strongly to other metal species  
30 known to be in the repository system. The DOE assumes that because of this competition  
31 effect, the organic ligands will have no significant impact on the repository performance (see  
32 Appendix SOTERM, Section SOTERM.5, and Appendix SCR, Section SCR.2.5.6, for  
33 discussion).

#### 34 35 6.4.3.5 Dissolved Actinide Source Term

36  
37 Analysis reported in Appendix WCA (Section WCA.3) has demonstrated that the mobility in  
38 brine of the following actinides may be significant in the performance assessment of the  
39 WIPP: Th, U, Np, Pu, Cm, and Am. Although commonly referred to as actinides in the waste  
40 inventory, these substances are almost always present in the waste as solid actinide oxides or  
41 solid actinide salts, and if they dissolve in the WIPP brines, they will dissolve as complex ions.  
42 Additional discussion of actinide solubility modeling and the oxidation state distribution of the  
43 actinides is presented in Appendix SOTERM (Sections SOTERM.3 and SOTERM.4,  
44 respectively).

1 Actinides may be mobilized either by dissolution in brine as aqueous species, by  
2 bioaccumulation or sorption onto colloidal particles, or by condensation into colloidal forms as  
3 actinide-intrinsic colloids that could be carried by brine (see Section 6.4.3.6 for a discussion of  
4 colloidal actinides). The dissolved actinide source term model calculates the dissolved  
5 concentration of each actinide in solution by applying the modeled solubility for the particular  
6 oxidation state, as determined by the oxidation state distribution for that actinide, at the  
7 repository conditions presented in Section 6.4.3.4. Several oxidation states are not stable in  
8 the chemically reducing conditions described in Section 6.4.3.4. The unstable oxidation states  
9 are Np(VI), Pu(V), Pu(VI), and Am(V), as described in Appendix SOTERM (Section  
10 SOTERM.4).

11  
12 Thorium will exist only in the IV oxidation state (see Appendix SOTERM, Section  
13 SOTERM.4.1). Am and Cm will exist in only the III oxidation state (see Appendix SOTERM,  
14 Sections SOTERM.4.4 and SOTERM.4.5). For the remaining actinides, Pu, U, and Np, it is  
15 uncertain whether repository conditions will favor the lower or higher of the remaining  
16 oxidation states (see Appendix SOTERM, Sections SOTERM.4.2, SOTERM.4.3, and  
17 SOTERM.4.6). The DOE has captured the range of possible behavior by assuming that in half  
18 the realizations, conditions within the repository are extremely reducing and the solubility of  
19 all three of these actinides will be adequately represented by the solubility of their lower  
20 oxidation states. In the other half of the realizations, the solubilities of these actinides are well  
21 represented by the solubilities of the higher of the possible oxidation states. The factors  
22 controlling the aqueous actinide concentration in a possible oxidation state are equilibrium  
23 with anhydrite, halite, MgO, and brine.

24  
25 The solubility of the actinides as a function of equilibrium between anhydrite, halite, MgO,  
26 and brine is calculated outside of the performance assessment using FMT, a computer code  
27 for calculating actinide concentration limits based on thermodynamic parameters. The  
28 parameters for FMT are derived both from experimental investigations specifically designed  
29 to provide parameter values for this model and from the published literature. FMT and its  
30 application are described in Appendix SOTERM (Section SOTERM.3.5). Table 6-11 presents  
31 a summary of solubility parameter values for each actinide oxidation state consistent with the  
32 assumptions regarding chemical conditions stated in this section and Section 6.4.3.4. These  
33 values are documented in Table 6-11 and in Appendix PAR (Parameters 36 through 45 and  
34 Table PAR-39). Details of the generation of Table 6-11 are given in Appendix SOTERM  
35 (Section SOTERM.3).

36  
37 Actinide concentration may not be equal to the values sampled in LHS. This condition could  
38 arise when there are not sufficient actinides in the solid phase in a particular cell, when  
39 combined with the dissolved actinides that may have been transported into that cell from an

**Table 6-11. Summary of Dissolved Actinide Solubilities (moles per liter) in Castile and Salado Brines<sup>a</sup>**

Actinides	Brine	Maximum	Minimum	Median <sup>b</sup> or Constant
Am(III), Pu(III), Cm(III)	Salado	$1.46 \times 10^{-5}$	$5.82 \times 10^{-9}$	$4.73 \times 10^{-7}$
Pu(IV), Th(IV), U(IV)	Salado	$1.11 \times 10^{-4}$	$4.40 \times 10^{-8}$	$3.58 \times 10^{-6}$
Np(IV)	Salado	-	-	$4.40 \times 10^{-6}$
Np(V)	Salado	-	-	$2.30 \times 10^{-6}$
U(VI)	Salado	$2.19 \times 10^{-4}$	$8.70 \times 10^{-8}$	$7.07 \times 10^{-6}$
Am(III), Pu(III), Cm(III)	Castile	$1.64 \times 10^{-6}$	$6.52 \times 10^{-10}$	$5.30 \times 10^{-8}$
Pu(IV)	Castile	$1.51 \times 10^{-7}$	$6.00 \times 10^{-11}$	$4.88 \times 10^{-9}$
Th(IV)	Castile	-	-	$6.00 \times 10^{-9}$
U(IV)	Castile	-	-	$6.00 \times 10^{-9}$
Np(IV)	Castile	-	-	$6.00 \times 10^{-9}$
Np(V)	Castile	-	-	$2.20 \times 10^{-6}$
U(VI)	Castile	$2.21 \times 10^{-4}$	$8.80 \times 10^{-8}$	$7.15 \times 10^{-6}$

<sup>a</sup> Inorganic chemistry controlled by the Mg(OH)<sub>2</sub> - MgCO<sub>3</sub> pair.

<sup>b</sup> Appendix SOTERM (Sections SOTERM.3.6 and SOTERM.7.2) discusses the relationship of this distribution to the modeled solubility.

adjacent cell, to achieve the concentration value as determined by LHS sampling. This situation is referred to as inventory limited.

The actinide inventory is depleted on a cell-by-cell basis by the computer code NUTS (NUclide Transport Systems) for the undisturbed, E1, and E2 scenarios. The treatment of the E1E2 scenario is described in Section 6.4.13.5. In a computational cell, the processes affecting actinide dissolved concentration are dissolution of solid actinide compounds, advection of dissolved actinides by brine flow from neighboring cells and interaction with colloidal particles (see Section 6.4.3.6). NUTS dissolves each actinide until the maximum concentration determined by the actinide source term algorithms is obtained or an inventory limit is reached. In the repository, the transfer of actinides between solid phase and solution is tracked to preserve mass balance of the actinide inventory. Outside the repository, the model does not precipitate actinides into the solid phase, thereby giving a conservative measure of mobile actinide quantities (see Appendix SCR, Section SCR.2.5.3.2).

#### 6.4.3.6 Source Term for Colloidal Actinides

Colloidal actinides are discussed in greater detail in Appendix SOTERM (Section SOTERM.6). Colloidal particles form in the repository by a variety of processes, including waste degradation, microbial activity, rock decomposition, and chemical condensation. These particles may also be carried into the repository by liquids moving from the Salado or through boreholes. Because of the presence of soils, nutrients, and cellulosic substrates for microbial

1 action in WIPP waste (see Appendix BIR), humic substances and microbes will be present in  
2 disposal room brines, or may form in situ. Actinide-intrinsic colloids may form in the disposal  
3 rooms from condensation of dissolved actinides. Mineral fragments, as well as humic  
4 substances and microbes, may provide surfaces on which dissolved actinides may sorb.  
5

6 Four types of colloidal particles are believed to cover the range of possible behavior of all  
7 colloid types (see Appendix SOTERM, Section SOTERM.6.1.2). The four particle types  
8 considered in performance assessment are microbes, humic and fulvic acids (humic  
9 substances), actinide-intrinsic (intrinsic), and mineral fragments. The concentration of  
10 actinides carried by each colloidal particle type depends on many of the same chemical  
11 conditions that govern the concentration of dissolved actinides.  
12

13 Actinide concentrations associated with humic substances and microbes are linked to  
14 dissolved actinide concentrations through proportionality constants based on experimental  
15 results. For humic substances, actinide complexation constants from WIPP-specific  
16 experiments or from published literature are coupled with experimentally determined site-  
17 binding densities and solubilities of different types of humic substances in WIPP brines. For  
18 microbes, actinide uptake was experimentally determined through experiments with WIPP-  
19 relevant bacteria cultures. Actinide concentrations associated with mineral fragment-type  
20 colloidal particles are estimated based on results from experiments designed to determine  
21 mobile concentrations in brines, coupled with site-binding densities of mineral substrates. For  
22 the Pu(IV)-polymer, actinide concentrations are determined through solubility experiments  
23 conducted from over- and undersaturation over a range of pmH values. Intrinsic colloids of  
24 other actinides were determined to be of negligible importance and are eliminated from  
25 performance assessment calculations. For more discussion on this topic refer to Appendix  
26 SOTERM (Section SOTERM.6.3.2.2).  
27

28 Actinides associated with microbes and humics are related to the concentration of dissolved  
29 actinides in the repository through proportionality constants determined from interpretation of  
30 WIPP-relevant experiments and the literature (Appendix SOTERM, Sections SOTERM.6.3.3  
31 and SOTERM.6.3.4). The proportionality-constant relationship is not based rigorously on  
32 thermodynamic equilibrium but is simply an empirical relationship. The concentration of  
33 actinides associated with the Pu(IV)-polymer is a constant value determined from  
34 experimental results at the pmH conditions dictated by the presence of MgO backfill.  
35 Likewise, the concentration of actinides associated with mineral colloids is also a constant  
36 value, not linked to the concentration of dissolved actinides. Actinides associated with  
37 humics and microbes represent most of the colloidal actinide source term. Consequently, the  
38 colloidal actinide source term is closely related to the dissolved actinide source term. As  
39 discussed in Section 6.4.6.2, however, the source terms are considered separately for transport  
40 in the Culebra.  
41

42 For performance assessment, the concentration of each actinide element on each colloidal  
43 particle type during a realization is a fixed value. The concentration parameters are  
44 summarized in Table 6-12. Actual values of actinide concentration on colloidal particles are  
45 constrained by inventory limits.

Table 6-12. Colloid Concentration Factors

	Concentration on Mineral Fragments <sup>a</sup>	Concentration as Intrinsic Colloid <sup>a</sup>	Proportion Sorbed on Microbes <sup>b</sup>	Maximum Sorbed on Microbes <sup>c</sup>	Proportion Sorbed on Humics <sup>b</sup>		Maximum Sorbed on Humics <sup>a</sup>
					Salado	Castile	
Th(IV)	$2.6 \times 10^{-8}$	0.0	3.1	0.0019	6.3	6.3	$1.1 \times 10^{-5}$
U(IV)	$2.6 \times 10^{-8}$	0.0	0.0021	0.0021	6.3	6.3	$1.1 \times 10^{-5}$
U(VI)	$2.6 \times 10^{-8}$	0.0	0.0021	0.0023	0.12	0.51	$1.1 \times 10^{-5}$
Np(IV)	$2.6 \times 10^{-8}$	0.0	12.0	0.0027	6.3	6.3	$1.1 \times 10^{-5}$
Np(V)	$2.6 \times 10^{-8}$	0.0	12.0	0.0027	$9.1 \times 10^{-4}$	$7.4 \times 10^{-3}$	$1.1 \times 10^{-5}$
Pu(III)	$2.6 \times 10^{-8}$	0.0	0.3	$6.8 \times 10^{-5}$	0.19	1.37 <sup>d</sup>	$1.1 \times 10^{-5}$
Pu(IV)	$2.6 \times 10^{-8}$	$1.0 \times 10^{-9}$	0.3	$6.8 \times 10^{-5}$	6.3	6.3	$1.1 \times 10^{-5}$
Am(III)	$2.6 \times 10^{-8}$	0.0	3.6	NA	0.19	1.37 <sup>d</sup>	$1.1 \times 10^{-5}$

<sup>a</sup> In units of moles colloidal actinide per liter

<sup>b</sup> In units of moles colloidal actinide per mole dissolved actinide

<sup>c</sup> In units of moles total mobile actinide per liter

<sup>d</sup> A cumulative distribution from 0.065 to 1.60 with a mean value of 1.1 was used.

NOTE: The colloidal source term is added to the dissolved source term to arrive at a total source term. Mineral fragments were provided with distributions, but the maximum was used as described in Appendix SOTERM (Section SOTERM.7.1.3). Humic proportionality constants for III, IV, and V were provided with distributions, but only the Castile Am(III) and Pu(III) were sampled.

The concentrations of colloidal actinides indicated in this section are assumed to be concentrations of actinides mobilized on colloidal particles. The indicated concentrations will be entrained in moving brine. For conservatism, it is assumed that no actinides sorb onto colloidal particles that are not mobile in the repository. Thus all actinides in the repository will be present in the solid phase, dissolved in the aqueous phase, or as colloidal actinides suspended in the aqueous phase.

When actinide inventory in a model cell is sufficient, the concentration of colloidal actinides will be at the values indicated in Table 6-12. The total concentration of an actinide in solution and suspension is limited by the amount of solid available to dissolve from the inventory. This condition is called inventory-limited when it occurs.

Colloid concentrations are calculated by the source term procedure described in Appendix SOTERM (Sections SOTERM.7.1.4 and SOTERM.7.2). Processes affecting the transport of colloids in the Culebra are addressed in Section 6.4.6.2.2.

#### 6.4.4 Shafts and Shaft Seals

The four shafts connecting the repository to the surface are represented in performance assessment with a single shaft, represented by Regions 2 through 11 on Figures 6-13 and 6-14. This single shaft has a cross section and volume equal to the total cross section and volume of the four real shafts it represents and is separated from the waste disposal regions in the model by the true north-south distance from the waste to the nearest shaft (the Waste Shaft). Upon closure of the repository, the shafts will be sealed as described in Section 3.3.1. The seal system is represented in performance assessment by discretizing 11 model regions in the shaft. These regions are as follows: an earthen fill region above the Rustler; a compacted clay column in the Rustler; an asphalt region at the top of the Salado; three concrete sections within the Salado; an upper Salado compacted clay column; a thick section of compacted crushed salt; a lower Salado compacted clay column separated into upper and lower segments; and a concrete monolith at the repository horizon (see Appendix SEAL, Section 4 and Appendix A). The concrete components in the Salado represent the concrete asphalt waterstops in the seal system design. Seal material parameter values used in the performance assessment are provided in Table 6-13.

Conceptually, the shafts are assumed to be surrounded by a DRZ in the Salado. Within the bedded halite, the DRZ begins to form immediately after excavation and develops progressively as a function of unloading as the formation creeps toward the excavated area. From a sealing perspective, the most important characteristic of the DRZ is the higher permeability that results from dilatant deformation and the increased pore volume.

The properties of the DRZ are known to vary with the type of adjacent material, time, and depth. When the shaft seals are emplaced, back pressures will progressively develop over time as the surrounding salt creeps inward. The back pressure applied by the seal material will progressively reduce the magnitude of the stress differential, which is the source for the DRZ microfracturing mechanism. The back pressure also results in a higher mean stress, which induces healing of the DRZ. The shaft DRZ permeability will, over time, approach that of the intact halite. Also, since the creep rate of the salt surrounding the shafts depends on depth, the back pressures supplied by the seal materials will result in DRZ healing at rates that increase with depth. The relative stiffness of the seal material is a factor, as well.

In the performance assessment model, the radial extent of the DRZ around the shaft seal materials is an input parameter obtained by numerical model calculations and is corroborated by field data (see Appendix SEAL, Section 8 and SEAL Appendix C). The permeability of the DRZ around the shaft versus distance is assumed to follow a log linear relationship. Permeability of the DRZ at the shaft wall is based on experimental data collected in the air intake shaft (Dale and Hurtado 1996) and Room M (Van Pelt 1995). More information on how the DRZ is incorporated into the shaft parameters is contained in Appendix PAR (Parameter 12).



Table 6-13. Shaft Materials Parameter Values

Parameter (units)	Maximum	Minimum	Median or Constant
<b>ALL SHAFT MATERIALS</b>			
Residual Brine Saturation, $S_{br}$ (unitless)	0.6	0	0.2
Residual Gas Saturation, $S_{gr}$ (unitless)	0.4	0	0.2
Pore Distribution, $\lambda$ (unitless)	8.10	0.11	0.94
Maximum Capillary Pressure (pascals) <sup>a</sup>	-	-	$10^8$
Threshold Pressure, $P_t$ (pascals)	-	-	0
<b>CLAY SHAFT MATERIALS</b>			
Permeability (square meters) - Rustler Compacted Clay <sup>b</sup>	$5 \times 10^{-18}$	$1.0 \times 10^{-21}$	$5 \times 10^{-19}$
Permeability (square meters) - Upper Salado Compacted Clay <sup>b</sup>	$5 \times 10^{-18}$	$1.0 \times 10^{-21}$	$5 \times 10^{-19}$
Permeability (square meters) - Lower Salado Compacted Clay <sup>b</sup>	$5 \times 10^{-18}$	$1.0 \times 10^{-21}$	$5 \times 10^{-19}$
Permeability (square meters) - Bottom Clay <sup>b</sup>	$5 \times 10^{-18}$	$1.0 \times 10^{-21}$	$5 \times 10^{-19}$
Thickness (meters) - Rustler Compacted Clay	-	-	94.3
Thickness (meters) - Upper Salado Compacted Clay	-	-	104.85
Thickness (meters) - Lower Salado Compacted Clay	-	-	23.9
Thickness (meters) - Bottom Clay	-	-	9.24
Effective Porosity (percent) - All Clays	-	-	24.0
Pore-Volume Compressibility (1/pascals) - Rustler Compacted Clay	-	-	$1.96 \times 10^{-9}$
Pore-Volume Compressibility (1/pascals) - Upper Salado Compacted Clay	-	-	$1.81 \times 10^{-9}$
Pore-Volume Compressibility (1/pascals) - Lower Salado Compacted Clay and Bottom Clay	-	-	$1.59 \times 10^{-9}$
<b>SALT SHAFT MATERIAL</b>			
Permeability (square meters) - Salt <sup>b</sup>	$2 \times 10^{-18}$	$1 \times 10^{-23}$	$5.4 \times 10^{-21}$
Thickness (meters) - Salt	-	-	171.37
Effective Porosity (percent) - Salt	-	-	5.0
Pore-Volume Compressibility (1/pascals) - Salt	-	-	$1.60 \times 10^{-9}$
<b>CONCRETE SHAFT MATERIALS</b>			
Permeability (square meters) - Concrete ( $T < 400$ years)	$1 \times 10^{-17}$	$1 \times 10^{-23}$	$1.78 \times 10^{-19}$
Permeability (square meters) - Concrete ( $T > 400$ years) and Concrete Monolith	-	-	$1 \times 10^{-14}$
Thickness (meters) - Concrete	-	-	45.72
Thickness (meters) - Concrete Monolith	-	-	9.08
Effective Porosity (percent)	-	-	5.00
Threshold Pressure $P_t$ (pascals) - All Concrete <sup>a</sup>	-	-	0
Pore-Volume Compressibility (1/pascals) - All Concrete	-	-	$2.64 \times 10^{-9}$

**Table 6-13. Shaft Materials Parameter Values (Continued)**

Parameter (units)	Maximum	Minimum	Median or Constant
<b>ASPHALT SHAFT MATERIAL</b>			
Permeability (square meters) - (T = 0 - 10,000 years)	$10^{-18}$	$10^{-21}$	$10^{-20}$
Thickness (meters)	-	-	37.28
Effective Porosity (percent)	-	-	1.00
Pore-Volume Compressibility (1/pascals)	-	-	$2.97 \times 10^{-8}$
<b>EARTHEN FILL MATERIAL ABOVE RUSTLER</b>			
Permeability (square meters) (T = 0 - 10,000 years)	-	-	$1 \times 10^{-14}$
Thickness (meters)	-	-	165.06
Effective Porosity (percent)	-	-	32.0
Pore-Volume Compressibility (1/pascals)	-	-	$3.1 \times 10^{-8}$

<sup>a</sup> Capillary pressure for all shaft materials is set to 0.

<sup>b</sup> These values represent the permeabilities of the seal material without the surrounding DRZ incorporated. See Appendix IRES, Section IRES.2, for time-dependent values.

The DRZ surrounding the shaft is not represented explicitly in the BRAGFLO mesh (Figures 6-13 to 6-15). Rather, the mesh has been simplified to represent only the cross-sectional area of the four WIPP shafts, and the permeability values for the various seal components at different times have been adjusted to account for the presence of the shaft DRZ. This adjustment, which yields effective permeabilities, can be done because in Darcy flow the flux through a porous medium is a linear function of the product of the permeability of the medium and the cross-sectional area across which flow occurs. Thus, the flux that would occur through a shaft and its surrounding DRZ can be modeled equivalently using the shaft cross-sectional area with a higher seal component permeability. Equations for the derivation of the effective permeabilities are given in Appendix PAR (Parameter 12) and Appendix IRES (Section IRES.2). The permeabilities of shaft components are calculated in the SCMS (see Section 6.4.1.1) from LHS parameter values according to these equations. Appendix IRES (Section IRES.2) shows calculated shaft component effective permeabilities.

#### 6.4.5 The Salado

The Salado is the principal natural barrier to fluid flow between the waste disposal panels and the accessible environment. Fluid flow in natural conditions in the Salado is discussed in Section 2.2.1.3. Excavation of the repository has altered natural pressure gradients in the Salado, creating the potential for fluid flow into the excavation. Fluid flow, gas generation, and volume changes from creep closure cause changes in pressure gradients through time. Salt creep, as well as possible fracturing from high repository pressure, alters the permeability and other flow properties of the rock near the repository. Depending on pressure gradients

1 developed and altered material properties, gas and brine flow may be enhanced in affected  
2 portions of the Salado.

3  
4 For performance assessment, the DOE conceptualizes the Salado as a porous medium  
5 composed of several rock types arranged in layers, through which flow occurs according to  
6 Darcy's law. Two rock types, impure halite and anhydrite, are used to represent the intact  
7 Salado. Once sampled, model parameters for all layers are uniform and constant, with two  
8 exceptions, porosity and permeability. Conceptually, this assumption of constant properties is  
9 based on observations of compositional and structural regularity in layers exposed by the  
10 repository and on the inference that there is little variation in large-scale averages of rock or  
11 flow properties across the disposal system. For several meters above and below the  
12 repository, a DRZ has increased permeability compared to intact rock and offers little  
13 resistance to flow between anhydrite interbeds and the repository. In all rock units, porosity  
14 can vary from initial values due to compressibility, depending on pressure changes in a  
15 computational grid block. As discussed in Section 6.4.5.2, a model has been implemented in  
16 interbeds to simulate the effects of fracturing caused by high repository pressure as pore  
17 pressure approaches or exceeds lithostatic.

18  
19 Specific information about the three submodels used to represent impure halite, Salado  
20 interbeds, and the DRZ is presented in the following sections.

#### 21 22 6.4.5.1 Impure Halite

23  
24 The DOE uses a single porous medium with spatially constant rock and hydrologic properties  
25 (Region 19 in Figures 6-13 and 6-14) in performance assessment to represent intact, halite-  
26 rich layers in the Salado and minor interbeds contained within those layers that are not  
27 explicitly represented. A comparison has been made between the simplified stratigraphy used  
28 in the performance assessment model and a model with a more detailed stratigraphy in the  
29 vicinity of the repository; this comparison supports use of the stratigraphic representation used  
30 for performance assessment. This model comparison is described in Christian-Frear and  
31 Webb (1996).

32  
33 Gas may not be able to flow through intact, halite-rich strata of the Salado under realistic  
34 conditions for the repository. Gas flow in liquid-saturated rock depends on the gas pressure  
35 required to overcome capillary resistance to initial gas penetration and development of  
36 interconnected gas pathways that allow gas flow (threshold pressure). While the permeability  
37 of halite is known to be low, its threshold pressure has never been measured. An empirical  
38 relationship between threshold pressure and permeability in non-WIPP rocks (Davies 1991,  
39 17 – 19) suggests that threshold pressure will be sufficiently high that gas will not be able to  
40 flow through the halite-rich strata of the Salado under any conditions foreseeable for the  
41 WIPP (see Appendix MASS, Section MASS.13.1). Values used by the DOE for halite  
42 threshold pressure are consistent for generic material of low permeability and prevent the flow  
43 of gas into the impure halite regions (Table 6-14). This is a conservative assumption because  
44 gas flow in halite would decrease the pressure in the repository and the driving force available  
45 for flow elsewhere. Table 6-14 shows various parameter values used in modeling the Salado

1 impure halite. Additional information on parameter values is contained in Appendix PAR  
 2 (Parameters 17 through 19 and Table PAR-32).

3  
 4 **Table 6-14. Salado Impure Halite Parameter Values**

5

6 <b>Parameter (units)<sup>a</sup></b>	<b>Maximum</b>	<b>Minimum</b>	<b>Median or Constant</b>
7 Permeability (square meters)	$10^{-21}$	$10^{-24}$	$3.16 \times 10^{-23}$
8 Effective Porosity (percent)	3.0	0.10	1.0
9 Threshold Pressure, $P_t$ (pascals) <sup>b</sup>	$1.13 \times 10^8$	$1.03 \times 10^7$	$3.41 \times 10^7$
10 Residual Brine Saturation, $S_{br}$ (unitless)	-	-	0.3
11 Residual Gas Saturation, $S_{gr}$ (unitless)	-	-	0.2
12 Pore Distribution Parameter, $\lambda$ (unitless)	-	-	0.7
13 Maximum Capillary Pressure (pascals)	-	-	$10^8$
14 Rock Compressibility (1/pascals) <sup>c</sup>	$1.92 \times 10^{-10}$	$2.94 \times 10^{-12}$	$9.75 \times 10^{-11}$

15 <sup>a</sup> See Table 6-9 for fluid properties.

16 <sup>b</sup> Threshold pressure ( $P_t$ ) determined from the relationship:  $P_t = PCT\_A \cdot k^{PCT\_EXP}$  where PCT\_A and PCT\_EXP  
 17 are constants and k is the permeability.

18 <sup>c</sup> Pore compressibility = Rock compressibility/effective porosity.

19  
 20  
 21 **6.4.5.2 Salado Interbeds**

22  
 23 Three distinct anhydrite interbeds are modeled in BRAGFLO, representing MB138  
 24 (Region 20 in Figures 6-13 and 6-14), anhydrite layers a and b (Region 21), and MB139  
 25 (Region 28). The three intact interbeds have the same set of model parameters, and the  
 26 parameters are initially spatially constant. Porosity and permeability can vary spatially during  
 27 a simulation depending on the extent of interbed fracturing. The interbeds differ only in  
 28 position and thickness.

29  
 30 The three interbeds explicitly represented in the BRAGFLO model are included because they  
 31 exist in the disturbed region around the repository within which fluid is expected to be able to  
 32 flow with relative ease compared to the surrounding formation. MB139 and anhydrite layers  
 33 a and b are present within the DRZ that forms around excavations. MB138 is included along  
 34 with a thick DRZ because of uncertainty in the extent and properties of the DRZ and the  
 35 associated long-term isolation of MB138 from the repository.

36  
 37 In BRAGFLO, brine flows between the Salado and the repository in response to fluid  
 38 potential gradients that may form over time. Because of the low permeability of the impure  
 39 halite and relatively small surface area involved, direct brine flow between the impure halite  
 40 and the repository is relatively small. The interbeds included in the BRAGFLO model of the  
 41 Salado (Regions 20, 21, and 28), however, can serve as conduits for brine flow between the  
 42 impure halite and the repository. Conceptually, brine flows laterally along higher permeability  
 43 interbeds towards or away from the repository and vertically between the interbeds and the

1 lower permeability halite. Because the interbeds have a very large contact area with adjacent  
2 halite-rich rock, even a very small flux from the halite into the interbeds (for brine inflow) or  
3 to the halite from the interbeds (for brine outflow) can accumulate into a significant quantity  
4 of brine. In this manner, halite serves as a source or sink for brine in the repository. It is  
5 expected that, because of density differences between gas and brine and their stratification  
6 within the repository, brine outflow will be dominantly in MB139, and gas outflow will occur  
7 in anhydrite a and b or MB138. However, the model does not preclude other flow patterns.

8  
9 Interbeds contain natural fractures that may be partially healed. If high pressure is developed  
10 in an interbed, its preexisting fractures may dilate or new fractures may form, altering its  
11 porosity and permeability. Pressure-dependent changes in permeability are supported by  
12 experiments conducted in the WIPP underground and in the laboratory (Beauheim et al.  
13 1993). Accordingly, the DOE has implemented in BRAGFLO a porous-media model of  
14 interbed dilation and fracturing that causes the porosity and permeability of a computational  
15 cell in an interbed to increase as its pore pressure rises above a threshold value. Model details  
16 are presented in Appendix BRAGFLO (Section 4.10) and Appendix MASS (Section  
17 MASS.13.3). To the extent that it occurs, dilation or fracturing of interbeds is expected to  
18 increase the transmissivity of interbed intervals. The threshold pressure of dilated or fractured  
19 interbeds is expected to be low because apertures of the fractures increase; thus, fluid is  
20 expected to be able to flow outward readily if adequate pressure is available to dilate the  
21 interbeds.

22  
23 The model used to simulate the effects of interbed dilation or fracturing is explained in detail  
24 in Appendix BRAGFLO (Section 4.10). In summary, it assigns a fracture initiation pressure  
25 above the initial pressure at which local fracturing takes place, and changes in permeability  
26 and porosity occur above this pressure. Below this fracture initiation pressure, an interbed has  
27 the permeability and compressibility assigned by LHS and representative of intact rock.  
28 Below the fracture initiation pressure, the initial sampled porosity is modified slightly with  
29 pressure caused by compressibility. Above the fracture initiation pressure, the local  
30 compressibility of the interbed is assumed to increase linearly with pressure. This greatly  
31 increases the rate at which porosity increases with increasing pore pressure. Additionally,  
32 permeability increases by a power function of the ratio of altered porosity to initial porosity.  
33 For numerical reasons (that is, to prevent unbounded changes in parameter values that would  
34 create numerical instabilities in codes), a pressure is specified above which porosity and  
35 permeability change no further.

36  
37 Parameters associated with the interbeds are shown in Table 6-15. Table 6-16 lists parameters  
38 used in the model of interbed dilation and fracture. Additional information about interbed  
39 parameters is included in Appendix PAR (Table PAR-36 and Parameters 20 through 25).

40

**Table 6-15. Parameter Values for Salado Anhydrite Interbeds a and b, and MB138 and MB139**

Parameter (units) <sup>a</sup>	Maximum	Minimum	Median or Constant
Permeability (square meters)	$7.94 \times 10^{-18}$	$10^{-21}$	$1.29 \times 10^{-19}$
Effective Porosity (percent)	-	-	1.1
Threshold Pressure, $P_t$ (pascals) <sup>b</sup>	$5.28 \times 10^6$	$2.32 \times 10^5$	$9.74 \times 10^5$
Residual Brine Saturation, $S_{br}$ (unitless)	0.174	0.007846	0.084
Residual Gas Saturation, $S_{gr}$ (unitless)	0.197	0.014	0.077
Pore Distribution Parameter, $\lambda$ (unitless)	0.842	0.491	0.644
Maximum Capillary Pressure (pascals)	-	-	$10^8$
Rock Compressibility (1/pascals) <sup>c</sup>	$2.75 \times 10^{-10}$	$1.09 \times 10^{-11}$	$8.26 \times 10^{-11}$
Brine Far-Field Pore Pressure at elevation of MB139 and shaft intersection (pascals)	$13.9 \times 10^6$	$11.0 \times 10^6$	$12.5 \times 10^6$

<sup>a</sup> See Table 6-9 for fluid properties.

<sup>b</sup> Threshold pressure ( $P_t$ ) determined from the relationship:  $P_t = PCT\_A \cdot k^{PCT\_EXP}$  where PCT\_A and PCT\_EXP are constants and k is the permeability.

<sup>c</sup> Pore compressibility = Rock compressibility/effective porosity.

**Table 6-16. Fracture Parameter Values for Salado Anhydrite Interbeds a and b, and MB138 and MB139**

Parameter (units)	Constant
Fracture Initiation Pressure at MB139, base of shaft (pascals)	$12.7 \times 10^6$
Increment to give Full Fracture Porosity (percent), MB139 and MB138 <sup>a</sup>	3.9
Increment to give Full Fracture Porosity (percent), Anhydrite a and b <sup>a</sup>	23.9
Full Fracture Permeability (square meters)	$10^{-9}$
Increment above Fracture Initiation Pressure to Obtain Full Fracture Pressure (pascals) <sup>a</sup>	$3.8 \times 10^6$

<sup>a</sup> A fitting parameter to yield desired dilation over a variation in pressure.

### 6.4.5.3 DRZ

In the DRZ (Region 22 in Figures 6-13 and 6-14) near the repository, permeability and porosity are expected to generally increase in both halite and interbeds. These increases are due to a variety of processes. Creep closure and stress-field alterations as the result of the excavation are the dominant causes, similar to the processes discussed for the formation of the DRZ around the shaft (see Section 6.4.4). The increases in permeability and porosity in interbeds are not expected to be completely reversible with creep closure of the disposal rooms. The increase in DRZ permeability increases the ability of fluid to flow from interbeds to the waste disposal region. The increase in DRZ porosity provides a volume in which some

fluid could be retained so that it does not contact waste, or slows actinide movement. Performance assessment approximates the effects of the DRZ conservatively with respect to brine flow to the repository (see Appendix MASS, Section MASS.13.4). In the model, the permeability of this region is increased relative to intact Salado rock for the duration of a realization. The porosity of the modeled DRZ is increased by a fixed value of 0.0029 (0.29 percent) above the sampled intact Salado impure halite. The modeled DRZ extends above and below the repository from the base of MB138 to MB139. The performance assessment treatment of the DRZ creates a permanent high-permeability region that does not significantly impede flow between the repository and affected interbeds. Table 6-17 shows parameter values used in the performance assessment representation of the DRZ.

**Table 6-17. DRZ Parameter Values**

Parameter (units) <sup>a</sup>	Maximum	Minimum	Median or Constant
Permeability (square meters)	-	-	$10^{-15}$
Effective Porosity (percent) <sup>b</sup>	-	-	1.29
Threshold Pressure, $P_t$ (pascals)	-	-	0
Residual Brine Saturation, $S_{br}$ (unitless)	-	-	0
Residual Gas Saturation, $S_{gr}$ (unitless)	-	-	0
Pore Distribution Parameter, $\lambda$ (unitless)	-	-	0.7
Maximum Capillary Pressure (pascals)	-	-	$10^8$
Rock Compressibility (1/pascals) <sup>c</sup>	-	-	$7.41 \times 10^{-10}$

<sup>a</sup> See Table 6-9 for fluid properties.

<sup>b</sup> The DRZ effective porosity value for each realization is equivalent to the sampled value for the Salado halite plus 0.0029 (0.0029 is the difference between the medians for the DRZ and the halite).

<sup>c</sup> Pore compressibility = rock compressibility/effective porosity.

#### 6.4.5.4 Actinide Transport in the Salado

Actinide transport in the Salado is considered by the DOE to be a possible mechanism for release to the accessible environment. As in other areas of the disposal system, actinides in the Salado may be transported as dissolved species or as colloidal particles. Actinide transport is affected by a variety of processes that may occur along the flow path.

The DOE uses the NUTS code (see Appendix NUTS) to model the migration of radionuclides in the repository and surrounding formations. NUTS models radionuclide transport within all regions for which BRAGFLO computes brine and gas flow, and uses as input for each realization the corresponding BRAGFLO velocity field, pressures, porosities, saturations, and other model parameters including, for example, the geometrical grid, residual saturation, material map, and compressibility.

1 NUTS is used in two ways in the performance assessment. First, the code is used in a  
2 computationally fast tracer mode to identify those BRAGFLO realizations for which it is not  
3 necessary to do full transport calculations because contaminated brine never reaches the top  
4 of the salt or the accessible environment within the Salado. Such realizations have no  
5 potential to contribute to the total integrated release of radionuclides from the disposal  
6 system. If the tracer calculation indicates a possibility of consequential release, a  
7 computationally slow calculation of the full transport of each radionuclide is performed.  
8

#### 9 6.4.5.4.1 NUTS Tracer Calculations

10  
11 All BRAGFLO realizations are evaluated using NUTS in a tracer mode to identify those  
12 realizations for which there is no possibility of radionuclides reaching the accessible  
13 environment. The tracer simulations consider an infinitely soluble, nondecaying,  
14 nondispersive, and nonsorbing species as a tracer element. The tracer is given a unit  
15 concentration in all waste disposal areas of 1 kilogram per cubic meter. If this tracer does not  
16 reach the selected boundaries (the top of the Salado and the land withdrawal boundary within  
17 the Salado) in a cumulative mass greater than or equal to  $10^{-7}$  kilograms within 10,000 years,  
18 then it is assumed that there is no consequential release to these boundaries. If a cumulative  
19 mass greater than or equal to  $10^{-7}$  kilograms does reach the selected boundaries within 10,000  
20 years, a complete transport analysis is conducted. The value of  $10^{-7}$  kilograms is selected  
21 because, regardless of the isotopic composition of the release, it corresponds to a normalized  
22 release less than  $10^{-6}$  EPA units, which is the smallest release displayed in CCDF  
23 construction. The largest normalized release corresponding to  $10^{-7}$  kilograms would occur if  
24 the release were entirely  $^{241}\text{Am}$  and would be  $9.98 \times 10^{-7}$  EPA units.  
25

#### 26 6.4.5.4.2 NUTS Transport Calculations

27  
28 For those BRAGFLO realizations with greater than  $10^{-7}$  kilograms reaching the boundaries in  
29 the tracer calculations, NUTS models the transport of five different species of radionuclides  
30 ( $^{241}\text{Am}$ ,  $^{239}\text{Pu}$ ,  $^{238}\text{Pu}$ ,  $^{234}\text{U}$ , and  $^{230}\text{Th}$ ). These radionuclides represent a lumping of a larger  
31 number of radionuclides, as discussed in Appendix WCA (Sections WCA.3 and WCA.8.3).  
32 For decay purposes, radionuclides have been lumped together based on similarities to simplify  
33 the calculations, as discussed in Appendix WCA. For transport purposes, solubilities are  
34 lumped to represent both dissolved and colloidal forms. These lumpings simplify and expedite  
35 calculations.  
36

37 NUTS models radionuclide transport by advection (see Appendix MASS, Section MASS.13.5).  
38 NUTS disregards sorptive and other retarding effects throughout the entire flow region.  
39 Physically, some degree of retardation must occur at some locations within the repository and  
40 the geologic media, and the disregard of retardation processes is therefore conservative.  
41 NUTS also disregards reaction-rate aspects of dissolution and colloid formation processes, and  
42 mobilization is assumed to occur instantaneously. Neither molecular nor mechanical  
43 dispersion is modeled in NUTS. These processes are assumed to be insignificant in  
44 comparison to advection, as discussed further in Appendix MASS (Section MASS.13.5).  
45



1 Colloidal actinides are subject to retardation by chemical interaction between colloids and  
2 solid surfaces and by clogging of small pore throats (that is, sieving). It is expected that there  
3 will be some interaction of colloids with solid surfaces in the anhydrite interbeds. As well,  
4 because of the low permeability of intact interbeds, it is expected that pore apertures are small  
5 and some sieving will occur. However, colloidal particles, if not retarded, are transported  
6 slightly more rapidly than the average velocity of the bulk liquid flow. Because the effects on  
7 transport of slightly increased average pore velocity and retarding interactions with solid  
8 surfaces and sieving are offsetting, the DOE assumes residual effects of these opposing  
9 processes will be either small or beneficial and does not incorporate them in modeling of the  
10 transport of actinides in the Salado interbeds.

11  
12 If brine that has been in the repository moves into interbeds, it is likely that mineral  
13 precipitation reactions will occur. Precipitated minerals may contain actinides as trace  
14 constituents. The beneficial effects of the possible mineral co-precipitation process are  
15 neglected in performance assessment. Furthermore, colloidal-sized precipitates will behave  
16 like mineral-fragment colloids, which are destabilized by brines, quickly agglomerate and  
17 settle by gravity. The beneficial consequence of colloid precipitation is disregarded in  
18 performance assessment also.

19  
20 Additional processes that may impact transport in Salado interbeds are related to fractures,  
21 channeling, and viscous fingering. Interbeds contain natural fractures. Because of the low  
22 permeability of unfractured anhydrite, it is expected that most fluid flow occurring in  
23 interbeds will occur in fractures. Even though some properties of naturally fractured  
24 interbeds are characterized by in-situ tests (see Section 2.2.1.3), other uncertainty exists in the  
25 characteristics of the fracture network that may be created if gas pressure in the repository  
26 becomes high. The performance assessment modeling system accounts for the possible  
27 effects on porosity and permeability of fracturing through the implementation of a fracturing  
28 model (see Section 6.4.5.2). It is considered that the processes and effects associated with  
29 fracture dilation or fracture propagation that are not already captured by the performance  
30 assessment fracture model will be negligible (see Appendix MASS, Section MASS.13.3 and  
31 MASS Attachment 13.2). Of those processes not already incorporated, channeling is  
32 considered to have the greatest potential effect.

33  
34 Channeling is the movement of fluid through the larger aperture portions of a fracture network  
35 (that is, areas of local high permeability). It could locally enhance actinide transport.  
36 However, it is assumed that the effects of channeled flow in existing or altered fractures will  
37 be negligible on the scale of the disposal system. The DOE believes this assumption to be  
38 reasonable because processes that act to limit the effectiveness of channels or disperse  
39 actinides in them are likely to occur. First, if gas is present in the fracture network, it will be  
40 present as the nonwetting phase and will occupy the portions of the fracture network with  
41 relatively large apertures, where the highest permeabilities will exist locally. The presence of  
42 gas thus removes the most rapid transport pathways from the contaminated brine and  
43 decreases the impact of channeling. Second, brine penetrating the Salado from the repository  
44 is likely to be completely miscible with in-situ brine. Because of miscibility, diffusion or other

1 local mixing processes will probably broaden fingers (reduce concentration gradients) until the  
2 propagating fingers are indistinguishable from the advancing front.

3  
4 It is expected that gas will penetrate the liquid-saturated interbeds as a fingered front rather  
5 than as a uniform front. Fingers form because of the difference in viscosity between the  
6 invading fluid (gas) and the resident fluid (liquid brine), and because of channeling effects.  
7 This process does not affect actinide transport, however, because actinides of interest are  
8 transported only in the liquid phase, and the liquid phase will not displace gas in the relatively  
9 high-permeability regions because of capillary effects.

#### 10 **6.4.6 Units Above the Salado**

11  
12  
13 The geology and hydrology of units above the Salado are discussed in Sections 2.1.3 and  
14 2.2.1.4, respectively. In this section, the assumptions, simplifications, and models used in  
15 performance assessment modeling of these units are described. Because it is unlikely that  
16 these units will be impacted by undisturbed performance, modeling of these units is performed  
17 mainly because regulations require consideration of the effects of inadvertent human  
18 intrusions. See Appendix MASS (Section MASS.14) for additional discussion on the units  
19 above the Salado.

20  
21 The principal purpose of BRAGFLO calculations for units above the Salado is to determine  
22 the quantity of brine entering each unit from an intrusion borehole or the shaft. It is  
23 unrealistic to assume that all flow up an intrusion borehole enters the Culebra. Accordingly,  
24 BRAGFLO parameters are specified such that brine flow from the intrusion borehole is  
25 possible not only into the Culebra but also into the Magenta, Dewey Lake, and overlying units  
26 (as well as to the ground surface), depending on whether liquid rises above the Culebra in the  
27 intrusion borehole. Some of the assumptions regarding the properties of the units above the  
28 Salado are made specifically because they allow model simplification and are conservative  
29 with respect to actinide transport in the Culebra (that is, tend to cause overestimates of  
30 release).

31  
32 Consistent with accepted stratigraphic conventions for the area, discussed in Section 2.1.3, the  
33 units above the Salado are subdivided into seven layers in performance assessment; these are,  
34 in order of lower-to-higher, the unnamed lower member, the Culebra, the Tamarisk, the  
35 Magenta, the Forty-niner, the Dewey Lake, and the units above the Dewey Lake. The  
36 conceptual model for each of these layers is described sequentially in the following sections.

37  
38 A fundamental assumption in the conceptual model used in performance assessment for  
39 modeling actinide transport to the accessible environment in units above the Salado is that  
40 lateral actinide transport through rock formations is possible within the next 10,000 years only  
41 in the Culebra. This assumption is appropriate for several reasons relating to the properties of  
42 the other rock units and the groundwater basin conceptual model, which are discussed in  
43 following sections.

1 Section 2.2.1.4 describes the hydrology of the units above the Salado in terms of the  
2 groundwater basin conceptual model. Insight into the processes occurring in the groundwater  
3 basin obtained by modeling and other lines of evidence indicates that significant simplification  
4 of the hydrologic models in the units above the Salado is possible to obtain reasonable  
5 estimates of actinide transport (see Corbet and Knupp 1996; Appendix MASS, Section  
6 MASS.14.2). Therefore, the DOE calculates actinide transport in the units above the Salado  
7 with a two-dimensional conceptual and mathematical model. The models used for actinide  
8 transport in the units above the Salado are a simplified implementation of the groundwater  
9 basin conceptual model. The mathematical model is implemented in the computer codes  
10 SECOFL2D and SECOTP2D.

#### 11 12 6.4.6.1 Unnamed Lower Member

13  
14 The unnamed lower member of the Rustler (Region 18 in Figures 6-13 and 6-14) rests above  
15 the Salado. Its transmissivity has been measured (see Section 2.2.1.4.1.1) and was found to be  
16 low, which is consistent with expectations based on its anhydrite, gypsum, halite, clay, and  
17 siltstone composition (see Section 2.1.3.5.1). In performance assessment, this member is  
18 treated as impermeable, which prevents liquid flow and actinides from entering this unit. The  
19 DOE assumes that because of the low permeability of the unnamed lower member, any brine  
20 entering it adjacent to an intrusion borehole would be contained well within the site boundary  
21 for more than 10,000 years. Therefore, this treatment is conservative, regarding estimated  
22 releases into the Culebra, because allowing flow from a borehole or shaft into the unnamed  
23 lower member would, if anything, decrease flow into the Culebra. This would have a  
24 tendency to reduce the release of actinides from the Culebra to the accessible environment.  
25 In performance assessment, the thickness of the unnamed lower member is 118 feet (36  
26 meters), and its permeability is zero.

#### 27 28 6.4.6.2 The Culebra

29  
30 The Culebra is represented in BRAGFLO as Region 17 in Figures 6-13 and 6-14. The model  
31 geometries for Culebra flow calculations and transport calculations are discussed in this  
32 section. Boundary and initial conditions for this geometry are discussed in Section 6.4.10.2.  
33 Supplementing the discussion in this section are additional details about the Culebra modeling  
34 provided in Section 6.4.13 and Appendices SECOFL2D, SECOTP2D, MASS (Section  
35 MASS.15), and TFIELD (Sections TFIELD.2.2 and TFIELD.4).

36  
37 Conceptually, radionuclides might be introduced into the Culebra through brine flow up the  
38 sealed shafts. However, the chief source of actinides in the Culebra is modeled as long-term  
39 releases from a borehole that intersects the repository. If radionuclides are introduced into the  
40 Culebra, they may be transported from the point of introduction by groundwater flowing  
41 naturally through the Culebra.  
42

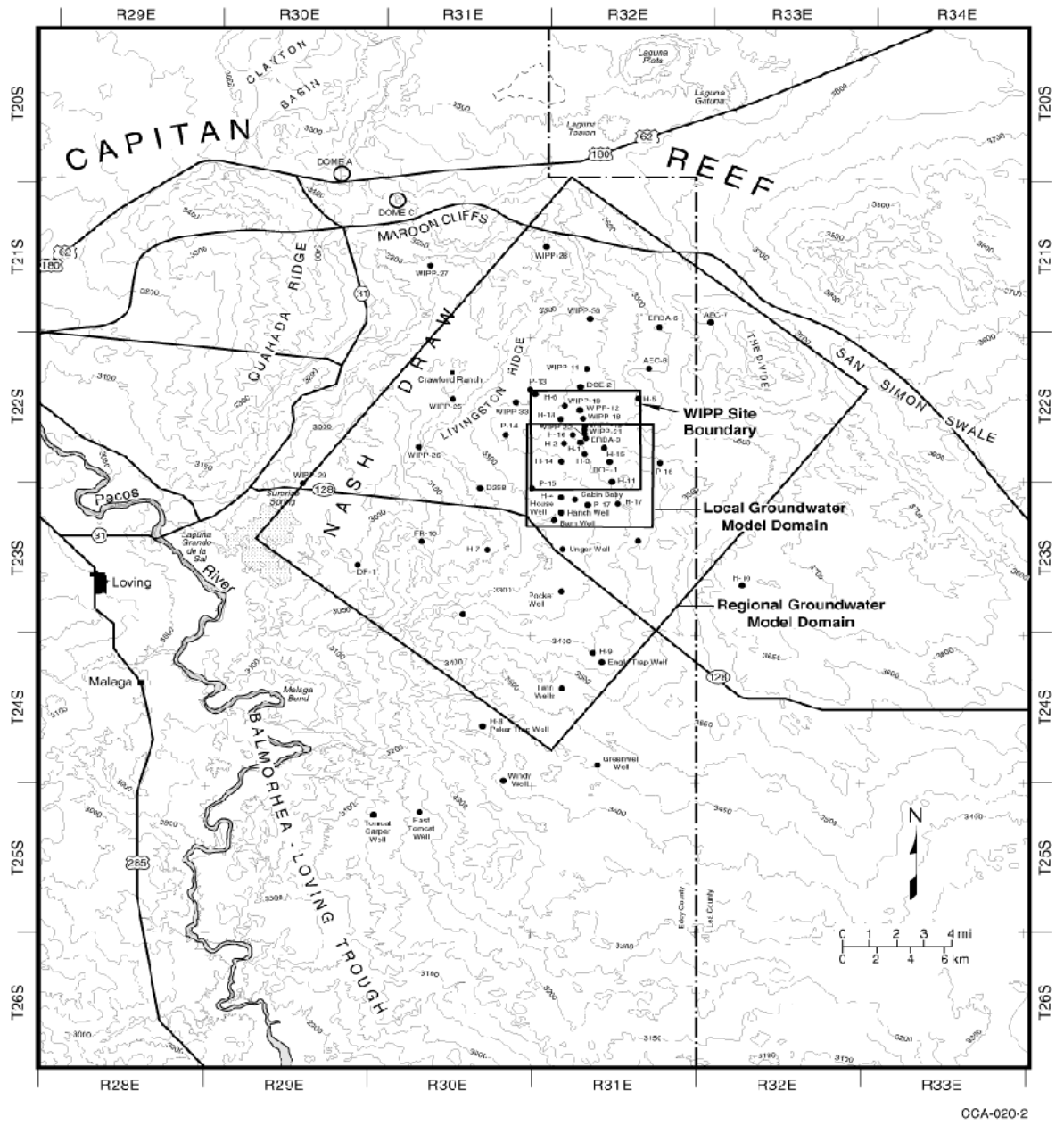
1 The Culebra is conceptualized as a horizontal, confined aquifer. For fluid flow, it is  
2 conceptualized as a heterogeneous porous medium which is represented by variations in  
3 transmissivity. A heterogeneous velocity field is used for transport calculations, but all other  
4 rock properties are conceptualized as constant (homogeneous) across the model area. The  
5 Culebra is conceptualized as having two types of porosity; a portion of the porosity is  
6 associated with high-permeability features where transport occurs by advection, and the rest  
7 of the porosity is associated with low-permeability features where flow does not occur and  
8 retardation occurs by physical processes (diffusion) and chemical processes (sorption). This  
9 type of conceptual model is commonly referred to as double-porosity. In this conceptual  
10 model, transport and retardation of colloidal particles is also considered. In this section, the  
11 principal topic will be fluid flow in the Culebra. The transport and retardation of dissolved  
12 actinides will be discussed principally in Section 6.4.6.2.1. The transport and retardation of  
13 colloidal particles will be discussed principally in Section 6.4.6.2.2.

14  
15 In the Culebra conceptual model used in performance assessment, the spatial distribution of  
16 transmissivity in the Culebra is important. Other potentially important processes acting on  
17 Culebra flow and transport are climate change (Section 6.4.9 and Appendix MASS, Section  
18 MASS.17) and the effects of subsidence caused by potash mining in the McNutt (Section  
19 6.4.6.2.3 and Appendix MASS, Section MASS.15.4).

20  
21 The SECOFL2D code uses two-dimensional horizontal grids to simulate groundwater flow. A  
22 regional grid approximately 14 miles by 19 miles (22 kilometers by 30 kilometers) with  
23 spatially varying transmissivity (Figure 6-17) is used to determine the flow fields in the WIPP  
24 region resulting from hydraulic head distributions that are controlled by distant topographic  
25 and hydrologic features (that is, boundary conditions). Because this grid is used to define the  
26 boundary conditions for the flow and transport calculations, it is discussed in detail in Section  
27 6.4.10.2, together with the specification of initial and boundary conditions. For transport in  
28 the region of interest within the disposal system, a local grid 4 miles by 4 miles (7 kilometers  
29 by 7 kilometers) with finer discretization is used in both SECOFL2D and SECOTP2D  
30 (Figure 6-18). Boundary heads and fluxes for the local grid are obtained by interpolation from  
31 the regional flow field. The grid for the local domain contains 75 columns and 65 rows,  
32 resulting in 4,875 grid blocks.

33  
34 Boundaries of the local domain were chosen to capture important flow paths and facilitate the  
35 computation of integrated release to the accessible environment. Because past analyses have  
36 indicated that transport in the Culebra will occur within a region that lies from southeast of the  
37 repository to west of the repository, the local domain extends slightly beyond the southern and  
38 western boundaries of the controlled area. Because it is not needed, a strip in the northern  
39 portion of the controlled area has been omitted from the local domain to ease the  
40 computational burden.

Title 40 CFR Part 191 Compliance Certification Application

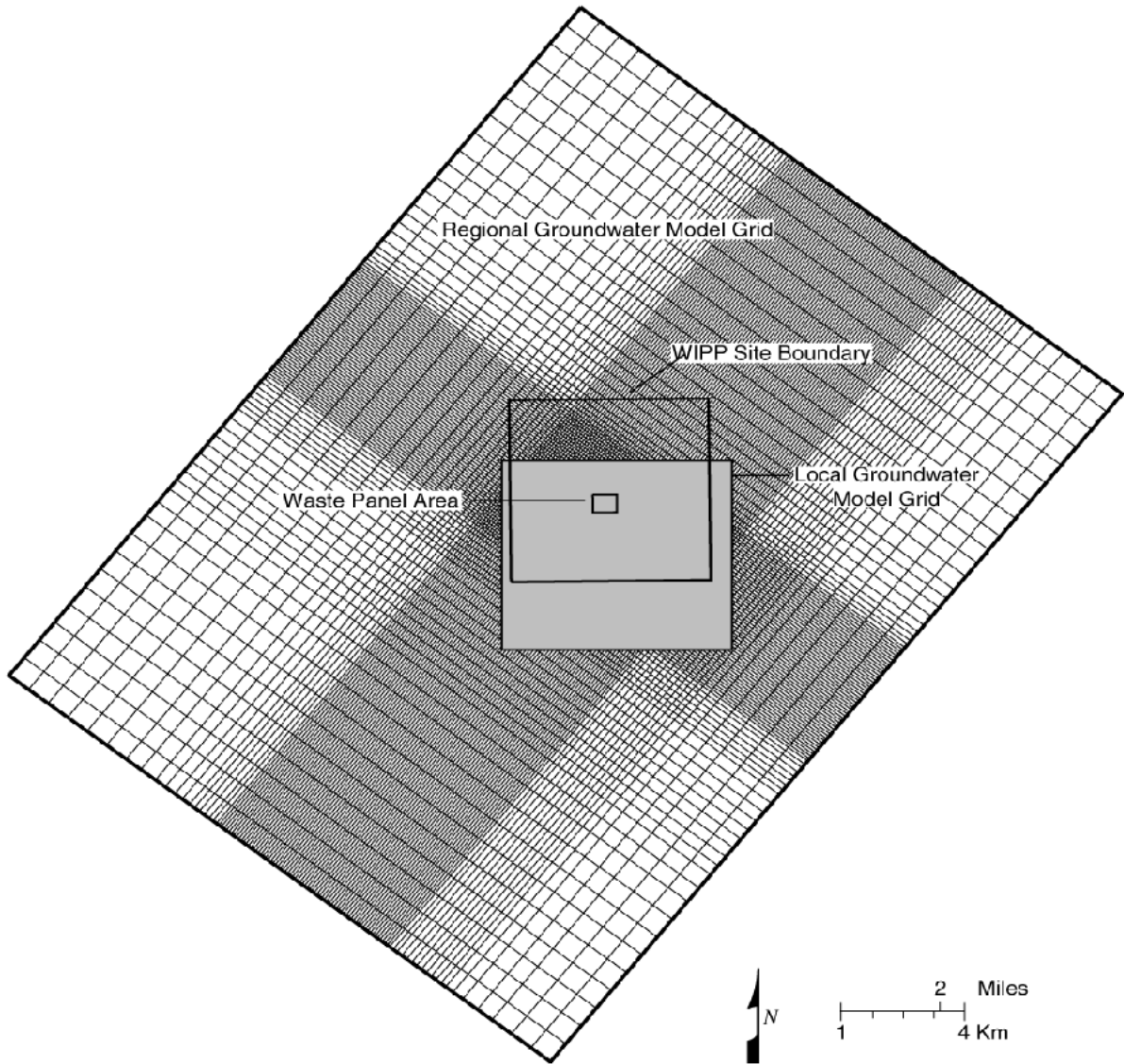


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1  
2

**Figure 6-17.** The Regional and Local Domains Used in the Horizontal Groundwater Model of the Culebra

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2

**Figure 6-18.** The Discretization Used in Modeling Groundwater Flow in the Culebra  
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1 Flow directions and transmissivities in the Culebra vary significantly from location to location  
2 to a considerable distance from the site boundary. Consequently, the effects of flow in the  
3 region around the WIPP site are considered important in the conceptual model. The  
4 boundaries to the flow model are discussed in Section 6.4.10.2; the grid itself is shown in  
5 Figure 6-18.

6  
7 The conceptual model for the Culebra assumes that fluid fluxes and directions in the future  
8 will be the same as they are projected to be at repository closure, unless future mining within  
9 the site occurs, in which case changes to fluid flow are calculated. A steady-state flow field is  
10 used to represent this assumption. Conditions assumed at site closure are the subsidence  
11 effects of mining in the near future outside the site boundary, climate change, and a  
12 reasonable estimate of the hydraulic conditions that existed prior to disturbances to the  
13 Culebra caused by site characterization activities (see Appendix MASS, Sections MASS.15.4  
14 and MASS.14.2, and Appendix TFIELD, Section TFIELD.2.2).

15  
16 The factors controlling fluid flow in the Culebra are conceptualized to be the hydraulic  
17 gradient, transmissivity distribution, and porosity. The hydraulic gradient and transmissivities  
18 used in performance assessment are coupled because they are calibrated to observed  
19 conditions by a process described in Appendix TFIELD (Section TFIELD.3). Flow fields are  
20 calculated with the code SECOFL2D using an assumption of homogeneous porosity in the  
21 Culebra. This single value is the total porosity for the Culebra, including both advective and  
22 diffusive porosity, as discussed below. Use of a single porosity for the flow calculation does  
23 not introduce inconsistency with transport calculations because (1) steady-state flow fields are  
24 used so flux through the system is not dependent on porosity, and (2) the velocity of liquid for  
25 transport is calculated based on a double-porosity model implemented in the code  
26 SECOTP2D. Thus, the important factors for flow calculations are the hydraulic gradient and  
27 transmissivity variation.

28  
29 Because BRAGFLO models a vertical section of the disposal system, the spatial distribution  
30 of transmissivity cannot be represented in the BRAGFLO grid. The source term of actinides  
31 in the Culebra is calculated in part from BRAGFLO flow fields, so parameters for the Culebra  
32 are required in BRAGFLO. Specifically, a single value of Culebra permeability representative  
33 for the Culebra in the area immediately over the waste-emplacement panels is input to  
34 partition fluid flow among the stratigraphic units along the human-intrusion borehole.

35  
36 BRAGFLO calculates gas flow and brine flow that may occur up a borehole (see Section  
37 6.4.7). The SECO codes model flow of the liquid phase only. The possible effects of gas on  
38 Culebra flow are not modeled in the SECO codes. This simplification is reasonable because  
39 after gas pressure is relieved by flow to the surface during drilling, little gas will remain in the  
40 repository. This gas will move up the borehole at low rates and tend to move directly to the  
41 top of the liquid-saturated section of the borehole, bypassing the Culebra. Any gas that does  
42 enter the Culebra will tend to displace brine from fractures and reduce the potential for  
43 actinide transport. Based on previous modeling (Lappin et al. 1989, Appendix E.1.5.1), the  
44 effect of the mass of brine being injected into the Culebra on the natural flow in the Culebra is  
45 negligible. Parameter values used in BRAGFLO to describe the Culebra are shown in



1 Table 6-18. Parameter values used in SECOFL2D are shown in Table 6-19. See Appendix  
 2 PAR (Table PAR-30) and relevant Culebra parameter sheets, for additional information.

3  
 4 **Table 6-18. Culebra Parameter Values for the BRAGFLO Model**

5

6 Parameter (units) <sup>a</sup>	Value
7 Permeability (square meters)	$2.1 \times 10^{-14}$
8 Effective Porosity (percent)	15.1
9 Rock Compressibility (1/pascals) <sup>b</sup>	$10^{-10}$
10 Threshold Pressure, $P_t$ (pascals) <sup>c</sup>	$1.5 \times 10^4$
11 Residual Brine Saturation, $S_{br}$ (unitless)	0.084
12 Residual Gas Saturation, $S_{gr}$ (unitless)	0.077
13 Pore Distribution Parameter, $\lambda$ (unitless)	0.644
14 Maximum Capillary Pressure (pascals)	$10^8$
15 Thickness (meters)	7.70
16 Initial Pressure (pascals)	$8.22 \times 10^5$

17 <sup>a</sup> See Table 6-9 for fluid properties in BRAGFLO.

18 <sup>b</sup> Pore compressibility = rock compressibility/effective porosity.

19 <sup>c</sup> Threshold pressure ( $p_t$ ) determined from relationship:  $P_t = PCT\_A \cdot k^{PCT\_EXP}$ , where PCT\_A and PCT\_EXP  
 20 are constants and k is the permeability.

21  
 22  
 23 **Table 6-19. SECO Fluid Properties**

24

25 Parameter (units)	Value
26 Liquid Density (kilograms per cubic meter)	1,000
27 Liquid Compressibility (1/pascals)	$4.4 \times 10^{-10}$

28  
 29  
 30 Three different thicknesses of the Culebra have been assumed in performance assessment  
 31 modeling. BRAGFLO uses a thickness of 25.3 feet (7.7 meters), representative of the  
 32 Culebra over the waste disposal panels. For calibrating transmissivity fields (see Appendix  
 33 TFIELD, Section 4.4.1) and calculating flow in the Culebra with SECOFL2D, a thickness of  
 34 25.4 feet (7.75 meters) is assumed, consistent with an average thickness over the area  
 35 modeled. For transport calculations using the code SECOTP2D, a thickness of 13 feet (4  
 36 meters) is assumed, consistent with observations of the thickness of the Culebra active in  
 37 transport, which are discussed in Section 6.4.6.2.1. Use of different thicknesses does not  
 38 introduce inconsistencies in the modeling, however, because the transmissivities used in these  
 39 codes are consistent, and it is this parameter that governs the total flux of fluid through the  
 40 Culebra. Furthermore, the fluid flux used in the SECOTP2D model is the same as that  
 41 calculated by SECOFL2D, ensuring consistency.

1 The spatial variation in transmissivity observed in the Culebra is incorporated by assigning  
2 different transmissivity values to every computational cell in the model. Because there is  
3 uncertainty in the estimated value of Culebra transmissivity in areas where measurements  
4 have not been made, a large set of transmissivity fields is developed. Each transmissivity field  
5 is a statistical representation of the natural variation in transmissivity that honors measured  
6 data according to certain criteria. For a set of transmissivity fields generated with identical  
7 constraints, each field is equally likely to represent actual conditions. Monte Carlo  
8 simulations using a large number of equally-likely transmissivity fields is a statistically sound  
9 method of characterizing the uncertainty associated with transmissivity in the Culebra. For  
10 details of the generation and use of transmissivity fields, refer to Appendix TFIELD (Section  
11 TFIELD.4.1).

12  
13 Regional flow directions and fluxes are calculated with the regional domain, as described  
14 earlier and shown in Figures 6-17 and 6-18. For increased resolution of transport processes in  
15 the region where transport is important, a finer grid is used. Consistency between the flow  
16 calculated in the regional domain and flow in the local domain is important, and is assured by  
17 interpolation of the boundary conditions and transmissivity field properties of the regional  
18 domain onto the local domain. This process of calculating two flow fields with domains of  
19 different extent and different resolution is implemented for practical reasons only. It is a  
20 method of incorporating regional effects in finely discretized local flow fields that has  
21 relatively low computational burden, compared to other possible methods. Additional  
22 discussion of this process is provided in Section 6.4.10.2.

23  
24 In summary, flow in the Culebra is calculated with the code SECOFL2D, using a conceptual  
25 model of a horizontal confined aquifer, regional flow effects, uniform porous media, steady  
26 state, and transmissivity variation. In addition, the effects of subsidence caused by potash  
27 mining in the McNutt are incorporated during the flow calculation, as discussed in Section  
28 6.4.6.2.3.

#### 29 30 *6.4.6.2.1 Transport of Dissolved Actinides in the Culebra*

31  
32 Actinides may be introduced into the Culebra by brine flowing up a borehole or by brine  
33 flowing up the shaft. Three principal processes have been demonstrated to occur naturally  
34 that affect the transport and retardation of dissolved actinides. Dissolved actinides will be  
35 carried by advection in the natural flow of Culebra groundwater. Dissolved actinides will  
36 diffuse into the matrix. Dissolved actinides will sorb to varying extents onto the different  
37 minerals lining pore walls or fractures. It is possible that dissolved actinides may participate  
38 as trace constituents in reactions between water and rock and be bound up in newly formed  
39 minerals, but this phenomenon is not included in the conceptual model. These processes are  
40 complicated to characterize because of known stratigraphic variation in the Culebra and  
41 expected heterogeneity in solution chemistry along the possible flow paths from the injection  
42 point to the accessible environment.

43  
44 The basic stratigraphy of the Culebra is continuous across the WIPP site (Appendix FAC,  
45 Section FAC.4.1.2), and it contains layers with significantly different properties (Holt and

1 Powers 1984, 1986, 1990, and Appendix FAC, Section FAC.5.2). Hydraulically, there  
2 appear to be two distinct layers in the Culebra. Mercer and Orr (1979) report the result of a  
3 tracer and temperature survey that suggests there is not significant flow in the upper 14 feet  
4 (4.3 meters) of the Culebra. Culebra hydraulic testing at well H-14 indicates generally low  
5 permeabilities but a slightly higher permeability in the upper portion (Beauheim 1987). In  
6 descriptions from the air intake shaft, Holt and Powers (1990) noted that most of the fluid  
7 produced came out of the lower portion of the Culebra. Hydraulic tests at the H-19 hydropad  
8 indicate that the permeability of the upper portion of the Culebra is significantly lower than  
9 the permeability of the lower portion. Consistent with hydraulic indicators, tracer tests  
10 conducted at H-19 confirmed that the upper portion of the Culebra makes no significant  
11 contribution to the transport of dissolved species, although it may act to retard solute transport  
12 by diffusion into it. The Culebra at the WIPP site is conceptualized as having very low  
13 permeability in the upper approximately 9.8 feet (3 meters), and variable permeability in the  
14 lower portion, which can be lower than the upper portion in regions where the Culebra as a  
15 whole is relatively impermeable. Thus, the bulk of the data indicates that the majority of the  
16 flow and transport takes place in the lower portions of the Culebra. Accordingly, for flow and  
17 transport calculations, an effective thickness of the Culebra of 13.1 feet (4 meters) is  
18 assumed.

19  
20 There is considerable variability in the structure and size of porous features in the Culebra,  
21 including fractures (of a variety of dimensions and interconnectedness), vugs, interparticle and  
22 intercrystalline porosity. The principal flow occurs within those features with the high  
23 permeability, and slower flow and diffusion are primary processes in the lower permeability  
24 features. Tracer test interpretations indicate that at some locations flow occurs predominantly  
25 through fractures (advective porosity is low) and at other locations slower transport indicates  
26 that flow is occurring in other permeable features such as vugs connected by microfractures,  
27 and possibly interparticle porosity (higher advective porosity). Tracer test interpretations also  
28 indicate that matrix diffusion is an important process in high-permeability regions of the  
29 Culebra. In other words at least two scales of porosity are needed to reasonably represent the  
30 transport processes in the Culebra (that is, a double-porosity model). At some locations of  
31 low permeability, fractures may be absent or filled with gypsum. An alternative conceptual  
32 model for transport at these locations is uniform single porosity with a high porosity. To  
33 simplify calculations, the uniform single porosity model was not implemented; the double  
34 porosity model implemented results in faster transport.

35  
36 In SECOTP2D, advective porosity represents the porous features in which flow occurs.  
37 Advective porosity values are low, which is representative of flow in fractures. Diffusive  
38 porosity represents those porous features in which no flow is assumed to occur and diffusion  
39 and sorption occur. Diffusive porosities are large relative to advective porosity,  
40 representative of the vugs, interparticle, and intercrystalline porosity of the bulk rock.

41  
42 The processes that occur in the advective porosity portion of the Culebra are advection  
43 (flow), dispersion (spreading caused by heterogeneity), diffusion within the advective  
44 porosity, and diffusion into the diffusive porosity. Important factors in this conceptual model  
45 are the velocities of fluid in the advective porosity, free-water diffusion coefficients, and

1 dispersion coefficients. The most important factor is the fluid velocity. Free-water tracer  
2 diffusion coefficients are specified for actinides. Dispersive spreading at the scale of disposal-  
3 system modeling is dominated by the effects of heterogeneities explicitly incorporated in the  
4 transmissivity fields input to SECOFL2D. This eliminates the need to account for larger-scale  
5 features by specifying a dispersion coefficient for SECO modeling larger than those observed  
6 at the hydropad-test scale.

7  
8 Fluid velocity in SECOTP2D is coupled to the results of the fluid flow modeling conducted  
9 with SECOFL2D on the local domain (see the preceding section). Fluid flow directions and  
10 volumetric fluxes in SECOTP2D are calculated in SECOFL2D. The flow velocities in the  
11 transport calculation are determined using the fluxes from the fluid flow calculation, the  
12 Culebra thickness specified for the transport calculation, and the advective porosity specified  
13 for the transport calculation. Because a different transmissivity field is used and the values of  
14 several important parameters are sampled, each realization uses a different velocity field.  
15 Retardation is conceptualized to be a function of physical effects of diffusion into diffusive  
16 porosity, and sorption. Diffusion is parameterized by the diffusive porosity (which can  
17 essentially be thought of as a reservoir for diffusion) tortuosity, matrix block length and free-  
18 water diffusion coefficient. Tortuosity represents the tortuous structure of the porosity within  
19 the matrix; it acts to slow the diffusion process. The matrix block length is a conceptual  
20 construct representing the ratio of the surface area between advective and diffusive porosity  
21 to the volume of diffusive porosity features; physical retardation increases as the matrix block  
22 length decreases. Physical retardation also increases if tortuosity or the free-water diffusion  
23 coefficient of diffusive porosity are larger. See Appendix MASS (Section MASS.15.2 and  
24 MASS Attachment 15-6) and Appendix SECOTP2D (Section 2, Governing Equations) for  
25 more details.

26  
27 Chemical retardation of dissolved actinides is conceptualized to occur by sorption onto  
28 dolomite grains exposed in diffusive porosity because of the large amount of dolomite present  
29 in the Culebra. Chemical retardation increases if diffusive porosity is smaller because there is  
30 a larger volume of rock for sorption. Although clay minerals are present and would sorb  
31 actinides in the Culebra, their effects are not included in the conceptual model or parameter  
32 values specified. Effective properties for the rock matrix, which is assumed to be  
33 homogeneous, and solution chemistry are assumed and are incorporated directly in  
34 specification of the parameters for the retardation model (see Appendix MASS, Section  
35 MASS.15.2, and Appendix PAR, Parameters 49 through 57).

36  
37 The DOE uses a linear isotherm model to represent the retardation that occurs as dissolved  
38 actinides are sorbed onto dolomite. This model uses a single parameter  $K_d$  to express a linear  
39 relationship between sorbed concentration and liquid concentration. The  $K_d$ s used in  
40 performance assessment have been determined from experimental data and are conservatively  
41 chosen such that the model predictions of sorption are less than or equal to actual sorption  
42 expected along the possible flow paths in the Culebra should a release occur (Appendix  
43 MASS, Section MASS.15.2 and MASS Attachment 15-1). Other important parameters in the  
44 linear isotherm model are the diffusive porosity and the grain density of the Culebra because  
45 these determine the mass of dolomite available on which sorption can occur. Consistent with

1 the assumption of homogeneous rock properties in the conceptual model,  $K_{ds}$  and grain  
2 densities are selected and then applied to the entire transport domain and are held constant for  
3 an entire realization. See Appendices SECOTP2D (Section 7, User Interactions, Input and  
4 Output Files) and PAR (Parameters 49 through 57) for details of parameter definitions and  
5 values.

6  
7 Selection of the parameter values required by the SECOTP2D model for physical retardation  
8 and chemical retardation is performed in LHS according to the CDFs described in  
9 Appendix PAR. Important parameter values are summarized in Tables 6-20 and 6-21.

10  
11 In summary, the conceptual model for dissolved actinide transport includes the following:  
12 transport in advective porosity, physical retardation (diffusion) into diffusive porosity,  
13 chemical retardation (sorption) in diffusive porosity, homogeneous rock properties, and a  
14 linear isotherm to describe the sorption process. Some of the more important parameters are  
15 advective porosity, diffusive porosity, tortuosity, matrix block length, molecular diffusion  
16 coefficients,  $K_d$ , and the grain density of dolomite in the Culebra.

#### 17 18 6.4.6.2.2 Transport of Colloidal Actinides in the Culebra

19  
20 Colloidal particles are subject to many of the same processes that affect dissolved actinides,  
21 but because of their size several additional processes affect them. There are three process  
22 differences. Colloidal particles in general are preferentially carried in the center of pore  
23 throats by faster-moving fluid, which could cause slightly increased rates of transport  
24 compared to dissolved species. Colloidal particles can be filtered from flowing groundwater  
25 when they encounter small-aperture features in the pore network. Finally, colloidal particles  
26 may undergo different sorption processes than dissolved species.

27  
28 The primary distinction in the transport behavior of the different colloidal particles is whether  
29 particles diffuse into the matrix from fractures. This is controlled by the difference between  
30 the size of colloidal particles and the mean pore-throat diameters in the diffusive porosity of  
31 the Culebra. Colloidal particles that are smaller than the pore throats can diffuse into the  
32 diffusive porosity. Actinide intrinsic colloids and humic materials are small enough for this to  
33 occur. The conceptual model for these particles includes the processes of advection,  
34 diffusion, and dispersion in the advective porosity, diffusion into diffusive porosity, and  
35 sorption of actinides in diffusive porosity. This model is analogous to the model specified for  
36 dissolved actinides, although the parameter values are different. The conceptual model  
37 assumes that other retardation processes (for example, filtration) will not occur for actinide-  
38 intrinsic colloids and humic materials.

39  
40 In contrast, colloidal particles that are larger than pore throats will be excluded from the  
41 matrix and will remain in advective porosity. Microbes and mineral fragments are

**Table 6-20. Matrix Distribution Coefficients ( $K_d$ s) and Molecular Diffusion Coefficients for Dissolved Actinides in the Culebra**

Actinide	$K_d$ (cubic meters per kilogram)			Molecular Diffusion Coefficients (square meters per second) <sup>a</sup> Constant
	Maximum	Minimum	Median	
U(IV)	20.0	0.90	10.0	$1.53 \times 10^{-10}$
U(VI)	0.030	$3.0 \times 10^{-5}$	0.015	$4.26 \times 10^{-10}$
Th(IV)	20.0	0.90	10.0	$1.53 \times 10^{-10}$
Pu(III)	0.50	0.02	0.26	$3.00 \times 10^{-10}$
Pu(IV)	20.0	0.90	10.0	$1.53 \times 10^{-10}$
Am(III)	0.50	0.02	0.26	$3.00 \times 10^{-10}$

<sup>a</sup> See Appendix MASS, MASS Attachment 15-3

**Table 6-21. Culebra Actinides Flow and Transport Parameters Required for SECO Codes**

Parameter (units)	Maximum	Minimum	Median or Constant
Advective Porosity (percent)	1.0	0.01	0.10
Diffusive Porosity (percent)	25.0	10.0	16.0
Half Matrix Block Length (meters)	0.50	0.05	0.275
Longitudinal Dispersivity, $\alpha_L$ (meters)	-	-	0
Transverse Dispersivity, $\alpha_T$ (meters)	-	-	0
Grain Density (cubic kilograms per cubic meter)	-	-	2.82
Effective Thickness (meters)	-	-	4.0
Fracture Tortuosity (unitless)	-	-	1.0
Diffusive Tortuosity (unitless)	-	-	0.11

conceptualized as being larger than the mean pore-throat diameter in Culebra diffusive porosity. The conceptual model for these particles includes the processes of advection in advective porosity and filtration by small-aperture features that occur within the advective porosity. See Appendix MASS (Section MASS.15.3 and MASS Attachment 15-9) for additional discussion.

Experiments have demonstrated that mineral fragments and microbes are attenuated so effectively by the advective porosity in the Culebra that it was deemed unnecessary to include those colloids in performance assessment calculations. Under the neutral to slightly basic geochemical conditions expected in the Culebra, humic substances were found to not influence the sorption behavior of dissolved actinides. Therefore, actinides associated with

1 humic substances were treated as dissolved species in the performance assessment  
2 calculations. The only actinide-intrinsic colloid found to exist in significant concentrations  
3 was the Pu(IV)-polymer. At the WIPP, the total amount of Pu(IV)-polymer introduced to the  
4 Culebra was found to be insignificant with respect to the EPA normalized release limit and so  
5 was not included in transport calculations. See Appendix SOTERM (Section SOTERM.6) and  
6 Appendix MASS (Section MASS.15.3.1) for details. See Appendix MASS (Section  
7 MASS.15.3.3) for alternative modeling approaches considered.

8  
9 Indigenous microbes, humics, and mineral fragment colloids in the Culebra may react with  
10 actinides introduced to the Culebra in dissolved form to create new colloidal actinides. Newly  
11 formed actinide-bearing microbial and mineral colloids, however, will be attenuated similarly  
12 to colloidal actinides introduced from the repository. Therefore, disregarding the impact of  
13 newly formed microbial and mineral fragment colloidal actinides is conservative.  
14 Experimental results indicate that humics do not interact with dissolved actinides under  
15 Culebra geochemical conditions. Consequently, the quantity of newly formed humic actinides  
16 will be insignificant.

#### 17 18 6.4.6.2.3 Subsidence Due to Potash Mining

19  
20 Subsidence effects caused by potash mining are included in this performance assessment  
21 because of specific criteria in the EPA's 40 CFR Part 194. For incorporating the effects of  
22 subsidence caused by mining, the DOE uses the conceptual model provided by the EPA in  
23 40 CFR Part 194 and supporting documents.

24  
25 The EPA's conceptual model for mining is introduced in 40 CFR § 194.32 (b) and (c) and  
26 clarified in the Preamble and Background Information. 40 CFR § 194.32 (b) and (c) state

27  
28 (b) Assessments of mining effects may be limited to changes in the hydraulic conductivity of the  
29 hydrogeologic units of the disposal system from excavation mining for natural resources.  
30 Mining shall be assumed to occur with a one in 100 probability in each century of the regulatory  
31 time frame. Performance assessments shall assume that the mineral deposits of those resources,  
32 similar in quality and type to those resources currently extracted from the Delaware Basin, will  
33 be completely removed from the controlled area during the century in which such mining is  
34 randomly calculated to occur. Complete removal of such minerals resources shall be assumed  
35 to occur only once during the regulatory time frame.

36  
37 (c) Performance assessments shall include an analysis of the effects on the disposal system of  
38 any activities that occur in the vicinity of the disposal system prior to disposal and are  
39 reasonably expected to occur in the vicinity of the disposal system soon after disposal. Such  
40 activities shall include, but shall not be limited to, existing boreholes and the development of  
41 any existing leases that can be reasonably expected to be developed in the near future, including  
42 boreholes and leases that may be used for fluid injection activities.

43  
44 40 CFR § 194.32 (b) and (c) state what gets mined, when it gets mined, and the effects of  
45 mining on the disposal system—a conceptual model. Within the disposal system, mineral  
46 resources similar in quality and type to those currently being mined outside the disposal  
47 system may be mined at an uncertain time in the future. Outside the disposal system, mineral

1 resources reasonably expected to be mined in the near future should be assumed to be mined.  
2 These effects are included in analyses of both disturbed and undisturbed performance. Inside  
3 the disposal system, whether and when a mining event occurs after the active institutional  
4 control period is determined by a probabilistic model. Outside the disposal system, what is  
5 reasonably expected to be mined is assumed to be mined by the end of WIPP disposal  
6 operations. With respect to consequence analysis, mining affects only the hydraulic  
7 conductivity of the units of the disposal system.  
8

9 The DOE has identified areas that are assumed to be mined in a manner consistent with the  
10 conceptual model and other guidance presented by the EPA in 40 CFR Part 194. The only  
11 natural resource being mined currently near WIPP is potash in the McNutt, and it is the only  
12 mineral considered for future mining. Appendix MASS (Sections MASS.15.4 and MASS  
13 Attachment 15-4) provides a description of the method used to determine the extent of mining  
14 in the McNutt both inside and outside the disposal system. This description also presents  
15 additional relevant discussion by the EPA on the extent of mining. The extent of mining  
16 outside the disposal system used in this performance assessment is shown in Figure 6-19. It is  
17 based on the map of existing leases presented in Chapter 2.0 (Figure 2-37), setbacks from  
18 existing boreholes, and the presence of ore in the lease (see Appendix MASS, Section  
19 MASS.15.4 and MASS Attachment 15-5). Inside the disposal system, a region that could be  
20 mined in the future is specified based exclusively on the quality and type of ore present. This  
21 region was presented in Figure 2-38 (see Chapter 2.0) and is reproduced here for convenience  
22 as Figure 6-20.  
23

24 The EPA clarifies its conceptual model on the effects of mining on hydraulic conductivity of  
25 the units of the disposal system in the Preamble to 40 CFR Part 194 (EPA 1996a, 61 FR  
26 5229). The EPA states

27  
28 Some natural resources in the vicinity of WIPP can be extracted by mining. These natural  
29 resources lie within the geologic formations found at shallower depths than the tunnels and  
30 shafts of the repository and do not lie vertically above the repository. Were mining of these  
31 resources to occur, this could alter the hydrologic properties of overlying formations—including  
32 the most transmissive layer in the disposal system, the Culebra dolomite—so as to either  
33 increase or decrease groundwater travel times to the accessible environment. For the purposes  
34 of modeling these hydrologic properties, this change can be well represented by making  
35 corresponding changes in the values for the hydraulic conductivity. The Agency has conducted a  
36 review of the data and scientific literature discussing the effects mining can induce in the  
37 hydrologic properties of a formation. Based on its review of available information, the Agency  
38 expects that mining can, in some instances, increase the hydraulic conductivity of overlying  
39 formations by as much as a factor of 1,000, although smaller and even negligible changes can  
40 also be expected to occur. Thus, the final rule requires DOE to consider the effects of mining in  
41 performance assessments. In order to consider the effects of mining in performance  
42 assessments, the DOE may use the location-specific values of hydraulic conductivity,  
43 established for the different spatial locations within the Culebra dolomite, and treat them as  
44 sampled parameters varying between unchanged and increased 1,000-fold relative to the value  
45 that would exist in the absence of mining.  
46

47 This section adds four important clarifying concepts. First, the EPA has concluded that there  
48 are no minerals vertically above the repository similar in quality and type to those currently



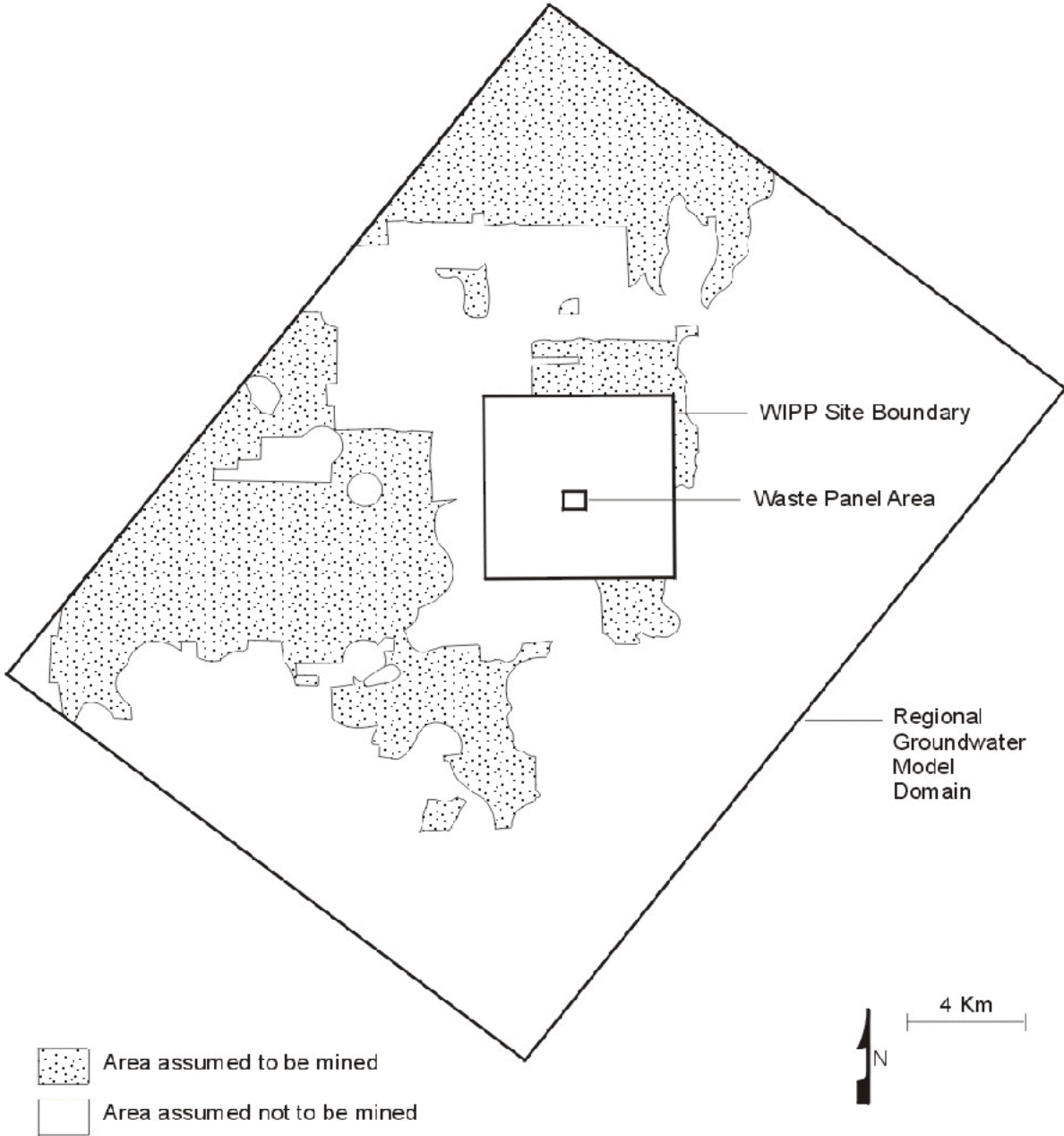
1 being extracted elsewhere in the Delaware Basin. Second, the EPA does not draw  
2 conclusions about whether mining will increase or decrease groundwater travel times to the  
3 accessible environment. Third, it may be assumed that the important effects of change in  
4 hydraulic conductivity occur only in the Culebra. Fourth, the spatially variant hydraulic  
5 conductivities established in the Culebra by the DOE may be multiplied, where they are  
6 impacted by mining, by a factor from 1 to 1,000. The DOE has applied the EPA's guidance  
7 regarding hydraulic conductivity to the transmissivity at locations in the Culebra.

8  
9 In using the EPA's conceptual model for mining, the DOE makes assumptions with respect to  
10 two topics in order to formulate the mathematical model. The angle of draw is a parameter  
11 necessary to translate the area mined in the McNutt to the area affected in the Culebra. In its  
12 Background Information Document for 40 CFR Part 194, the EPA discusses the possible  
13 range in the value of angle of draw (EPA 1996b, 9-36). The DOE has examined the  
14 Background Information for 40 CFR Part 194 (see EPA 1996b, 9-47) and concluded that an  
15 angle of draw of 45° is the value most consistent with the EPA's discussions and calculations.  
16 Second, the Agency does not specify a distribution to the multiplicative factor. As discussed  
17 in Appendix PAR (Parameter 34), the DOE has assigned a uniform distribution to this  
18 variable. As discussed in the introduction to Appendix PAR, a uniform distribution is  
19 appropriate when only lower and upper bounds of the range are known.

20  
21 Applying the angle of draw to the mined areas presented in Figures 6-19 and 6-20 makes the  
22 area impacted in the Culebra larger than the area actually mined in the McNutt. The area in  
23 the Culebra impacted by mining is shown in Figure 6-21, for outside the controlled area, and  
24 in Figure 6-22, for inside and outside the controlled area. These figures are plotted on the  
25 regional domain of the SECOFL2D model, which is used to calculate the effects of subsidence  
26 caused by mining on flow directions and rates in performance assessment.

27  
28 The effects of mining outside the disposal system are included in the undisturbed performance  
29 scenario, and, therefore, the effects of this mining are included in all scenarios. In other  
30 words, all calculations of transport in the Culebra include the effects of mining outside the  
31 controlled area. This is the undisturbed mining case because mining within the controlled area  
32 has not occurred.

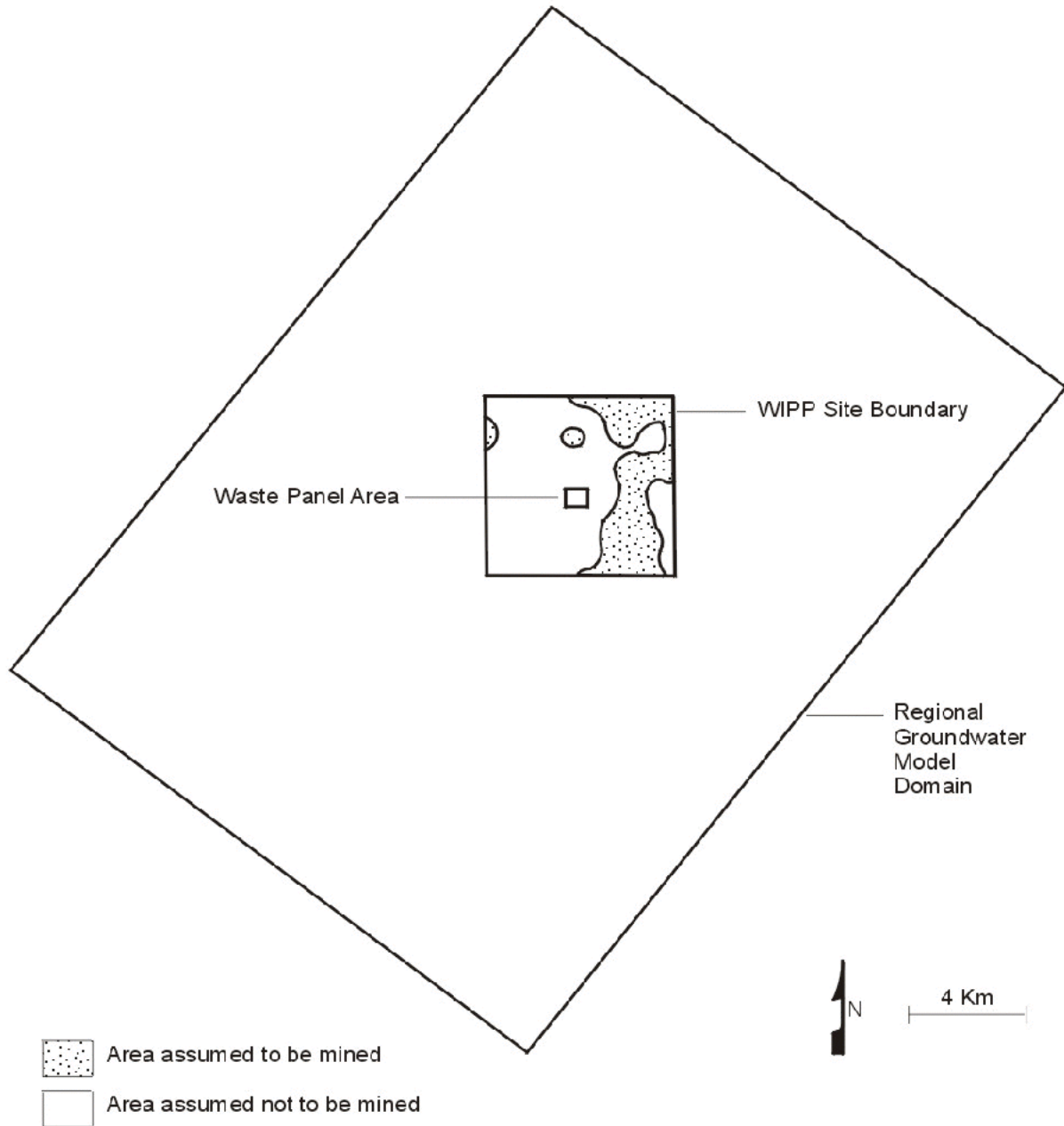
33  
34 These effects are incorporated by multiplying location-specific values in the transmissivity  
35 field in the area labeled "Impacted by Mining" in Figure 6-21 by a factor (mining multiplier)  
36 between 1 and 1,000 that is randomly sampled in LHS. The same factor is applied to all  
37 affected nodal blocks. In every vector of the LHS, the steady-state flow fields used in the  
38 10,000-year transport simulation incorporate this change to the transmissivity field. These  
39 simulations, followed by a transport simulation as discussed in preceding sections, develop  
40 reference conditions for the transport of actinides in the Culebra in the undisturbed mining  
41 case.



CCA-122-2

**Figure 6-19. Extent of Mining in the McNutt in Undisturbed Performance within SECOFL2D Regional Model Domain**

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**Figure 6-20. Extent of Future Mining in the McNutt within the Controlled Area Considered in Disturbed Performance**

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1 **Figure 6-21. Extent of Impacted Area in the Culebra from Mining in the McNutt**  
2 **Outside the Controlled Area for Undisturbed Performance**

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1 **Figure 6-22. Extent of Impacted Area in the Culebra for Disturbed Performance if**  
2 **Mining In the McNutt Occurs in the Future Within the Controlled Area**



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1 If mining occurs within the controlled area, an area of the Culebra inside and outside the  
2 disposal system is affected. This is the disturbed mining case. To evaluate the impact of  
3 disturbed mining, a second simulation of Culebra flow directions and rates is executed on the  
4 regional and local domains. In this second simulation, the affected location-specific values in  
5 the transmissivity field within the controlled area are multiplied by the same mining multiplier  
6 used for the undisturbed mining case outside the controlled area. These simulations, followed  
7 by a transport simulation as discussed in preceding sections, develop reference conditions (see  
8 Section 6.4.11) for the transport of actinides following mining inside the controlled area.  
9

10 The implementation of the EPA's probability model for future mining is presented in  
11 Section 6.4.12.8. A discussion of how the reference simulations for the undisturbed and  
12 disturbed mining cases are used in CCDF construction is presented in Section 6.4.13.  
13

#### 14 6.4.6.3 The Tamarisk

15  
16 The Tamarisk (Region 16 in Figures 6-13 and 6-14) rests between the more transmissive  
17 Culebra and Magenta. An in-situ hydraulic test determined that the transmissivity of the  
18 Tamarisk is lower than the transmissivity of the unnamed lower member (see Section  
19 2.2.1.4.1.3). This low transmissivity is consistent with expectations because of its anhydrite,  
20 gypsum, and clay composition (see Section 2.1.3.5.3). In performance assessment, this  
21 member is treated as impermeable. This may cause an increase in flow through the adjacent  
22 Culebra and Magenta. This treatment is considered conservative in that allowing flow from  
23 the intrusion borehole or shaft into the Tamarisk would, if anything, decrease flow into the  
24 Culebra, which would tend to reduce the consequence of radionuclide release to the Rustler.  
25 In performance assessment, the thickness of the Tamarisk is assumed to be 81.4 feet (24.8  
26 meters) and its permeability is effectively zero (Appendix PAR, Table PAR-29).  
27

#### 28 6.4.6.4 The Magenta

29  
30 The Magenta is described in Sections 2.1.3.5.4 and 2.2.1.4.1.4 and is shown as Region 15 in  
31 Figures 6-13 and 6-14. Transport of actinides through the Magenta to the accessible  
32 environment is not modeled. The assumption that no releases will occur from the Magenta is  
33 based on the hydraulic test results from wells on the WIPP site (Beauheim 1987, 110 – 118)  
34 that indicate that the Magenta is a porous medium with no hydraulically significant fractures  
35 (in contrast to the Culebra) and that its conductivity is lower than that of the Culebra. Early  
36 numerical simulations of flow and transport in the Magenta suggested much slower transport  
37 than in the Culebra (Barr et al. 1983, 26 – 27). Therefore, no radionuclides entering the  
38 Magenta will reach the accessible environment boundary within the 10,000-year time frame.  
39 Accordingly, the BRAGFLO model geometry reasonably approximates the effects of Magenta  
40 flow. The Magenta permeability is chosen conservatively as the lowest of measured values  
41 near the center of the WIPP site, in order to yield a lower reasonable amount of brine (and  
42 radionuclide) storage within the Magenta, while continuing to yield an upper bounding flow  
43 into the Culebra. The volumes of brine and radionuclides calculated to be stored in the  
44 Magenta are tracked and documented, however. Magenta parameter values are summarized in  
45 Table 6-22 and are described in more detail in Appendix PAR (Table PAR-28).

**Table 6-22. Model Parameter Values for the Magenta**

Parameter (units)	Value
Permeability (square meters)	$6.31 \times 10^{-16}$
Effective Porosity (percent)	13.8
Rock Compressibility (1/pascals) <sup>a</sup>	$2.64 \times 10^{-10}$
Threshold Pressure, $P_t$ (pascals) <sup>b</sup>	$5.06 \times 10^5$
Residual Brine Saturation, $S_{br}$ (unitless)	0.084
Residual Gas Saturation, $S_{gr}$ (unitless)	0.077
Pore Distribution Parameter, $\lambda$ (unitless)	0.644
Maximum Capillary Pressure	$10^8$
Thickness (meters)	8.5
Initial Pressure (pascals)	$9.17 \times 10^5$

<sup>a</sup> Pore compressibility = rock compressibility/effective porosity.

<sup>b</sup> Threshold Pressure ( $P_t$ ) determined from the relationship:  $PCT\_A \cdot k^{PCT\_EXP}$ , where PCT\_A and PCT\_EXP are constants and k is the permeability.

6.4.6.5 The Forty-niner

In evaluations of radionuclide transport, flow in the Forty-niner is considered insignificant because of its low transmissivity (see Section 2.2.1.4.1.5). As with the Tamarisk and unnamed lower members, the Forty-niner is assigned a permeability of effectively zero in performance assessment (Appendix PAR, Table PAR-27). This treatment is considered conservative in that allowing flow from the intrusion borehole or shaft into the Forty-niner would, if anything, decrease flow into the Culebra, which would tend to reduce the consequence of radionuclide release to the Rustler. Its modeled thickness is 56.8 feet (17.3 meters). It is shown as Region 14 in Figures 6-13 and 6-14.

6.4.6.6 Dewey Lake

Release of actinides to the accessible environment from transport in the Dewey Lake is assumed not to occur even if contaminated brine reaches the unit because the sorptive capacity of this unit appears large. This assumption is based on an analysis (Wallace et al. 1995) that demonstrated that the potential sorption capacity of the Dewey Lake is sufficient to prevent releases for 10,000 years. This analysis consisted of (1) a literature review of sorptive capacity of redbeds and (2) an estimate of the minimum sorption required to prevent release of actinides that enter the Dewey Lake to the accessible environment in 10,000 years. Comparison of the sorption values for the Dewey Lake analogues established by literature review with the minimum sorption required to prevent release indicates that the likely sorptive capacity of the Dewey Lake is orders of magnitude greater than would likely be required to prevent release. Therefore, the DOE assumes that chemical retardation occurring in the Dewey Lake will prevent release within 10,000 years of any actinides that might enter it. Geological and hydrological information on the Dewey Lake is presented in Sections 2.1.3.6

1 and 2.2.1.4.2, respectively. Dewey Lake parameter values are summarized in Table 6-23 (see  
 2 also Appendix PAR, Table PAR-26). The Dewey Lake is shown as Region 13 in Figures 6-13  
 3 and 6-14.

4  
 5 **Table 6-23. Dewey Lake Parameters for the BRAGFLO Model**

Parameter (units)	Value
Permeability (square meters)	$5.01 \times 10^{-17}$
Effective Porosity (percent)	14.3
Rock Compressibility (1/pascals) <sup>a</sup>	$10^{-8}$
Threshold Pressure, $P_t$ (pascals) <sup>b</sup>	0
Residual Brine Saturation, $S_{br}$ (unitless)	0.084
Residual Gas Saturation, $S_{gr}$ (unitless)	0.077
Pore Distribution Parameter, $\lambda$ (unitless)	0.644
Maximum Capillary Pressure (pascals)	$10^8$
Thickness (meters)	149.3
Initial Pressure (below water table at 980 meters, 43.3 meters below top of formation) (pascals)	hydrostatic
Initial Pressure, 20 percent liquid saturation above water table (atmospheres)	1

21 <sup>a</sup> Pore compressibility = rock compressibility/effective porosity.

22 <sup>b</sup> Threshold Pressure ( $P_t$ ) determined from the relationship:  $PCT\_A \cdot k^{PCT\_EXP}$ , where PCT\_A and  
 23 PCT\_EXP are constants and k is the permeability.

24  
 25  
 26 **6.4.6.7 Supra-Dewey Lake Units**

27  
 28 The units overlying the Dewey Lake are discussed in Sections 2.1.3.7 through 2.1.3.10 and are  
 29 shown as Region 12 in Figures 6-13 and 6-14. Because these units are thin and predominantly  
 30 unsaturated at the WIPP site, brine that might enter from the borehole (assuming brine can  
 31 reach this elevation) is assumed to flow downward to the Dewey Lake, where any actinides  
 32 will be sorbed. These units are included in BRAGFLO, however, and the possibility of  
 33 actinide transport into them from a borehole is considered in the performance assessment.  
 34 Actinide transport within the Supra-Dewey Lake units is not modeled, and it is assumed that  
 35 there can be no actinide release to the accessible environment through these units. For  
 36 performance assessment, the units overlying the Dewey Lake are represented as a single  
 37 hydrostratigraphic unit whose parameters are shown in Table 6-24.

**Table 6-24. Supra-Dewey Lake Unit Parameters for the BRAGFLO Model**

Parameter (units)	Value
Permeability (square meters)	$10^{-10}$
Effective Porosity (percent)	17.5
Rock Compressibility (1/pascals) <sup>a</sup>	$5.71 \times 10^{-8}$
Threshold Pressure, $P_t$ (pascals) <sup>b</sup>	0
Residual Brine Saturation, $S_{br}$ (unitless)	0.084
Residual Gas Saturation, $S_{gr}$ (unitless)	0.077
Pore Distribution Parameter, $\lambda$ (unitless)	0.644
Maximum Capillary Pressure (pascals)	$10^8$
Thickness (meters)	15.76
Initial Pressure, 8.36 percent liquid saturation (atmospheres)	1

<sup>a</sup> Pore compressibility = rock compressibility/effective porosity.

<sup>b</sup> Threshold Pressure ( $P_t$ ) determined from the relationship:  $PCT\_A \cdot k^{PCT\_EXP}$ , where PCT\_A and PCT\_EXP are constants and k is the permeability.

#### 6.4.7 The Intrusion Borehole

In accordance with the requirements of 40 CFR § 194.33(b)(1), the DOE models consequences of inadvertent and intermittent intrusion into the repository during drilling for natural resources as the most severe human intrusion scenario that may affect long-term performance of the disposal system. This section discusses the conceptual models used for drilling (particulate release during drilling, direct brine release during drilling, and long-term brine flow) and provides references to appropriate discussions of numerical modeling codes.

This section does not address the likelihood that inadvertent human intrusion will occur. As discussed in Chapter 7.3.4, the DOE believes passive institutional controls will be effective in reducing the likelihood of intrusion (see Appendix EPIC); however, regulatory guidance requires consideration of a nonzero probability of intrusion (40 CFR § 194.43[c]). The DOE's treatment of the probability of inadvertent human intrusion is discussed in Section 6.4.12.

Human intrusion scenarios require simulating penetration of an intrusion borehole into the waste disposal region. There are two effects associated with drilling: releases from the drilling itself and possible releases because of the long-term effects on fluid flow in the disposal system after the borehole casing and plugs have degraded. Both types of releases are estimated for two different types of intrusions: those that intersect pressurized brine in the Castile (E1 events, see Section 6.3.2.2.2), and those that do not (E2 events, see Section 6.3.2.2.1).

1 6.4.7.1 Releases During Drilling

2  
3 Consistent with the criterion of 40 CFR § 194.33(c)(1), releases that may occur during and  
4 immediately following the drilling event are modeled under the assumption that future drilling  
5 practices will be the same as those of the present (see Appendix DEL, Sections DEL.5 and  
6 DEL.6, for a complete description of present drilling practices). Figure 6-23 shows a  
7 schematic representation of a standard rotary drilling operation inadvertently penetrating the  
8 repository. A drill bit is attached to the bottom of a string of steel pipe, the lowest segments of  
9 which are reinforced collars. The drill bit, collars, and pipe are collectively referred to as the  
10 drill string. As the drill string rotates, liquid, referred to as drilling mud, is pumped down the  
11 interior of the pipe and out through the bit. The drilling fluid cools and lubricates the bit and  
12 then returns to the surface outside the pipe in the annulus between the pipe and the borehole  
13 wall. During its return flow, the mud carries the cuttings to the surface where they settle out  
14 in a mud pit. The mud is typically a water-based brine that is weighted with additives to  
15 maintain a hydrostatic pressure in the borehole equal to or greater than the normally  
16 anticipated fluid pressures in the formations being drilled. Salt-saturated brines are generally  
17 used in evaporites to prevent dissolution of the formation. Steel casing is installed in  
18 boreholes before entering the salt section to protect the near-surface units from contamination  
19 with fluids from deeper units and, after drilling through the salt section, to prevent hole  
20 closure on the drill string and subsequent in-hole hardware.

21  
22 If a rotary drill bit penetrates the waste, radionuclides may be brought to the surface by four  
23 means. First, some quantity of cuttings, which contain material intersected by the drill bit, will  
24 be brought to the surface. Second, cavings, which contain material eroded from the borehole  
25 wall by the circulating drill fluid, may also be brought to the surface by the circulating drilling  
26 mud. Third, releases of radionuclides may occur if the repository contains fluids at pressures  
27 higher than the pressure exerted by the drilling fluid. Spalling of waste material into the  
28 borehole may occur if high-pressure gas flows into the borehole. Brine as well as gas may  
29 enter the borehole from the repository if the driller is unable to control the pressure within the  
30 well or if the driller chooses not to control the pressure. The brine may flow to the surface,  
31 and if it has been in contact with waste, it may contain dissolved or suspended radionuclides.

32  
33 Releases of particulate waste material (that is, cuttings, cavings, and spillings) are modeled  
34 using the CUTTINGS\_S code as described in Section 6.4.11 and Appendix CUTTINGS.  
35 Appendix MASS (Section MASS.16.1) discusses the conceptual basis for the model. As  
36 discussed in Section 6.4.12.4, cuttings and cavings are calculated separately for CH-TRU and  
37 RH-TRU waste, with distinct waste streams considered. Spallings are calculated as  
38 homogeneous waste obtained by averaging over all CH-TRU waste. For all releases during  
39 drilling, appropriate corrections are made for radioactive decay. Releases of dissolved or  
40 suspended radionuclides contained in brine are modeled using the BRAGFLO and PANEL  
41 codes as described in the next section. Casing is assumed to be intact through the Rustler and  
42 overlying units during drilling, and there is assumed to be no communication between the  
43 borehole and those units. For all direct releases, actinides that enter the borehole are  
44 conservatively assumed to reach the surface.

1 *6.4.7.1.1 Direct Brine Release During Drilling*

2  
3 Direct brine release refers to the possibility that brine containing actinides may flow from the  
4 waste panels up a borehole to the surface during drilling (Appendix MASS, Section  
5 MASS.16.2). It is conceptualized that direct brine release to the surface will not occur every  
6 time a borehole penetrates the waste panels but rather that it can occur only when two  
7 conditions are met. The first condition is the presence of mobile brine in the waste panels.  
8 Because of brine consumption by corrosion and low initial saturation, it is possible for liquid  
9 saturations below the residual saturation to exist in the repository, in which case direct brine  
10 release cannot occur. The second condition is the pressure in the waste panels must be  
11 greater than the pressure at the base of the column of drilling mud. Drillers in the Delaware  
12 Basin use a salt-saturated mud with a specific gravity of about 1.23 while drilling through the  
13 Salado. This corresponds to a pressure of approximately 8 megapascals at the repository  
14 horizon (see Appendix MASS, Section MASS.16.2, and MASS Attachment 16-2). If fluid in  
15 the waste panels is below this pressure, no direct brine release during drilling can occur  
16 because liquid flow in the repository will be away from the borehole.

17  
18 In the conceptual model, resolution of the details of flow near the borehole is considered  
19 important, as the changing physical conditions over the short duration of this flow can  
20 significantly impact estimates of the total volume released. It is not assumed that a direct  
21 brine release would be noticed by the driller (EPA 1996a, 61 FR 5230). Also important to the  
22 conceptual model is how long direct brine release occurs. There are several ways in which  
23 the direct brine release could be stopped. A driller might detect higher flow rate to the mud  
24 pit and take action to mitigate consequences. Alternatively, direct brine release will stop  
25 when the driller cases the hole after reaching the base of the salt section. As discussed in  
26 Appendix MASS (MASS Attachment 16-2) and Appendix DEL (Section 7.5), the DOE  
27 assumes that for low volumes of fluid flow, the borehole will be controlled and cased within  
28 72 hours after the penetration of the repository. In all cases, all fluid flow to the surface  
29 during drilling is assumed to cease within 11 days after penetration of the repository.

30  
31 In the conceptual model for direct brine release, several other assumptions are made that  
32 relate to other conceptual models. The processes of direct solids release from cuttings,  
33 cavings, spall, and direct brine release are treated separately, although the direct brine release  
34 model does account for the effects of solids removal (spall) on fluid flow near the well bore.  
35 Direct brine release will affect the pressure and saturation in the repository. However, it is  
36 assumed that these effects are negligible over the long-term because of their transient and  
37 local nature, and they are not accounted for in long-term (10,000-year) BRAGFLO disposal  
38 system calculations. This assumption simplifies modeling because it allows detailed  
39 consideration of direct brine release over a short time period, without having to couple the  
40 results of these calculations back into the disposal system simulations.

1

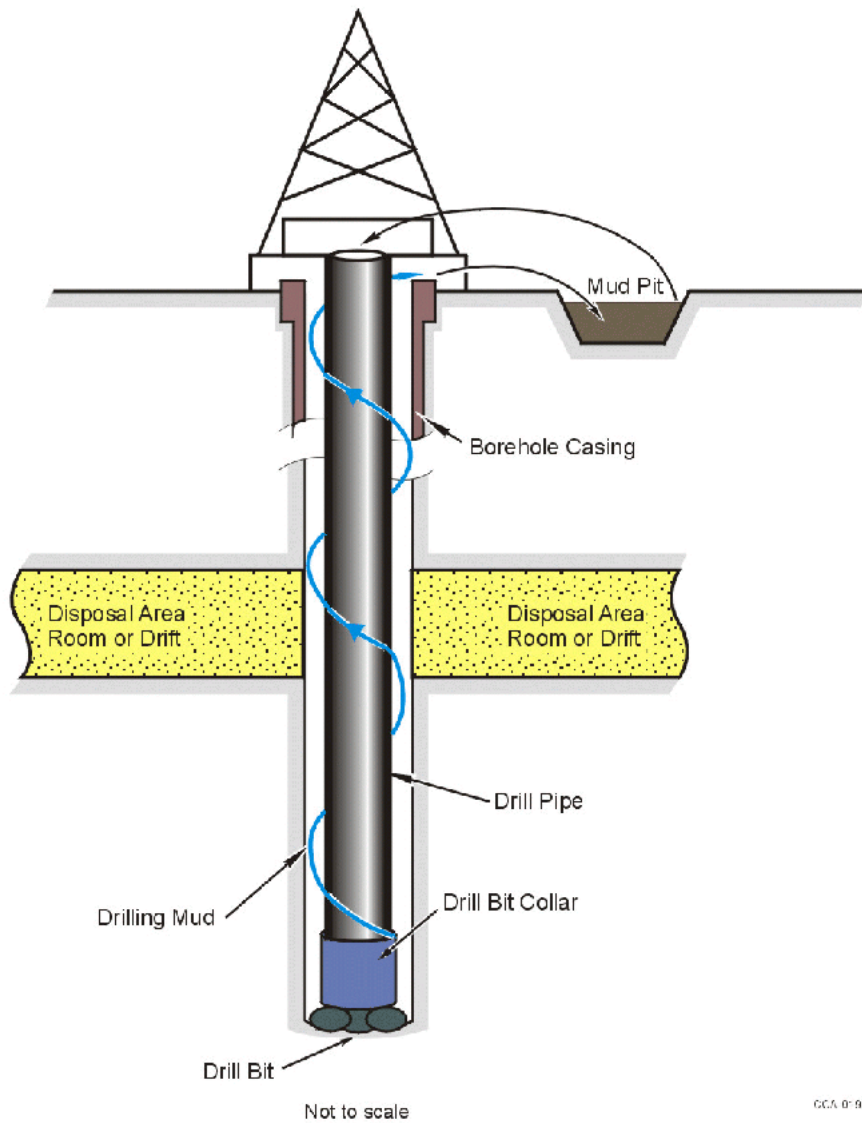


Figure 6-23. Schematic Representation of a Rotary Drilling Operation Penetrating the Repository



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1 The area over which fluid flow can occur during direct brine release is assumed to be the  
2 rooms and drifts of waste panels, the DRZ, room pillars, and panel closures. Because local-  
3 scale, short-duration flow is important, the geometry of the waste panels is considered  
4 important and is represented in the model. It is assumed that the flow interactions with the  
5 Salado other than the DRZ are not important during direct brine release. For this model,  
6 pillars are arbitrarily assumed to have the properties of the DRZ rather than intact halite,  
7 although in reality their properties are probably like a DRZ at their edge and like intact halite  
8 in their core. Since the DRZ permeability is greater than the permeability of intact halite, this  
9 assumption is conservative. A two-dimensional geometry is used parallel to the repository  
10 horizon, with a 1° dip from north to south. The geometry of the grid used is shown in  
11 Figure 6-24.  
12

13 The BRAGFLO code is used to calculate direct brine release, and the mathematical and  
14 computational model is called the BRAGFLO direct brine release (BRAGFLO\_DBR) model  
15 (Appendix MASS, Section MASS.16.2 and MASS Attachment 16-2). The initial and  
16 boundary conditions for this model are derived from the corresponding BRAGFLO disposal  
17 system simulation through several codes, including CUTTINGS\_S. Some of the parameters  
18 derived from the BRAGFLO disposal system model are permeabilities, porosities, two-phase  
19 flow properties, and the height of the waste region. Initial saturations and pressures in the  
20 BRAGFLO direct brine release model are mapped from the BRAGFLO disposal system  
21 model. Other parameters used in the BRAGFLO direct brine release models are consistent  
22 with those used in the BRAGFLO disposal system model (Appendix MASS, Section  
23 MASS.16.2 and MASS Attachment 16-2, 3 – 5).  
24

25 It is possible that a direct brine release could occur from a panel that is connected by a  
26 previously-drilled, abandoned borehole to a brine reservoir in the Castile. If this were to  
27 happen, flow directly between the two boreholes, analogous to the E1E2 scenario for long-  
28 term performance, may affect the estimate of the total brine released. The direct brine release  
29 for this possibility is calculated by BRAGFLO\_DBR by placing a constant-pressure, flowing  
30 injection well as a boundary condition in the model. The locations used for these boreholes  
31 are shown in Figure 6-24. It is assumed that a direct brine release from a panel that has a  
32 previously-drilled, abandoned borehole of the E2 type is not affected by the presence of the  
33 other borehole. Thus, reference direct brine release conditions are calculated for previously  
34 unintruded and E2-intruded panels, and for previously-intruded E1 panels. Details about the  
35 properties assigned to the flowing-well boundary condition are discussed in Appendix MASS  
36 (Section MASS.16.2 and MASS Attachment 16-2, Appendix A). Details about how the  
37 consequences of direct brine releases from other possible combinations of boreholes are  
38 accounted for in the CCDF are discussed in Section 6.4.13.  
39

40 A borehole could penetrate the repository anywhere. For simplification, the BRAGFLO  
41 direct brine release model assumes that calculation of direct brine release from several  
42 defined locations provides meaningful reference results for the possible variation in release  
43 because of location. The locations of boreholes from which representative results are  
44 calculated are indicated in Figure 6-24. In construction of a CCDF (see Section 6.4.13), the  
45 direct brine release associated with a borehole whose position is randomly selected is

1 correlated with the reference release most consistent with the geometry near the location of  
2 the random borehole.

3  
4 Accurate representation of the flow into the borehole is considered important in the  
5 BRAGFLO direct brine release model. Accordingly, a number of mathematical methods that  
6 are not used to calculate long-term releases are applied to the conditions in the borehole for  
7 calculation of direct brine releases. The methods used appear in Appendix MASS (Section  
8 MASS.16.2 and MASS Attachment 16-2).

#### 9 10 6.4.7.2 Long-Term Releases Following Drilling

11  
12 Long-term releases to the ground surface or into groundwater in the Rustler or overlying units  
13 may occur after the hole has been plugged and abandoned (Appendix MASS, Section  
14 MASS.16.3). As required by regulation, the plugging and abandonment of future boreholes  
15 are assumed to be “consistent with practices in the Delaware Basin at the time a compliance  
16 application is prepared” [40 CFR § 194.33(c)(1)]. Detailed examination of current practice in  
17 the Delaware Basin indicates that all boreholes abandoned recently are plugged to meet state  
18 and federal regulatory requirements protecting groundwater and natural resources (see  
19 Appendix DEL, Sections DEL.5.5 and DEL.6; Appendix MASS, Section MASS.16.3 and  
20 MASS Attachment 16-3). These plugs will be effective in preventing flow in abandoned  
21 boreholes for some period of time after emplacement. However, some plugs may fail and  
22 radionuclides may be transported in brine flowing up the borehole.

23  
24 Borehole plug configurations used today in the Delaware Basin vary based on the local  
25 stratigraphy encountered in the hole, its total depth, and the types of fluids present. All holes  
26 are plugged with some combination of solid concrete plugs isolating different fluid-bearing  
27 horizons from each other and from the ground surface. As discussed in detail in Appendix  
28 MASS (Section MASS.16.3 and MASS Attachment 16-1) and Appendix DEL (DEL  
29 Attachment 7), six different plug configurations are identified that are potentially relevant to  
30 future borehole abandonment practice at the WIPP. As discussed in Appendix MASS  
31 (Section MASS.16.3.3 and MASS Attachment 16-3, Section 2.0), these six plug configurations  
32 can be approximated for performance assessment by three conceptual plugging patterns. The  
33 three plugging configurations addressed in the performance assessment are described in the  
34 following section. Probabilities of occurrence for each of these three plugging configurations  
35 are discussed in Section 6.4.12.7. Parameters used to describe the borehole and its plugs are  
36 summarized in Table 6-25.

##### 37 38 6.4.7.2.1 Continuous Concrete Plug through the Salado and Castile

39  
40 In this configuration, a continuous concrete plug is assumed to exist throughout the Salado  
41 and Castile (Appendix MASS, Section MASS.16.3 and MASS Attachment 16-3, Figure 1).  
42 Such a plug could be installed in keeping with current regulatory requirements of the New  
43 Mexico Oil Conservation Division Order R-111-P (State of New Mexico 1988, 10), which is  
44 applicable within the potash leasing area that includes the WIPP site. The purpose of the

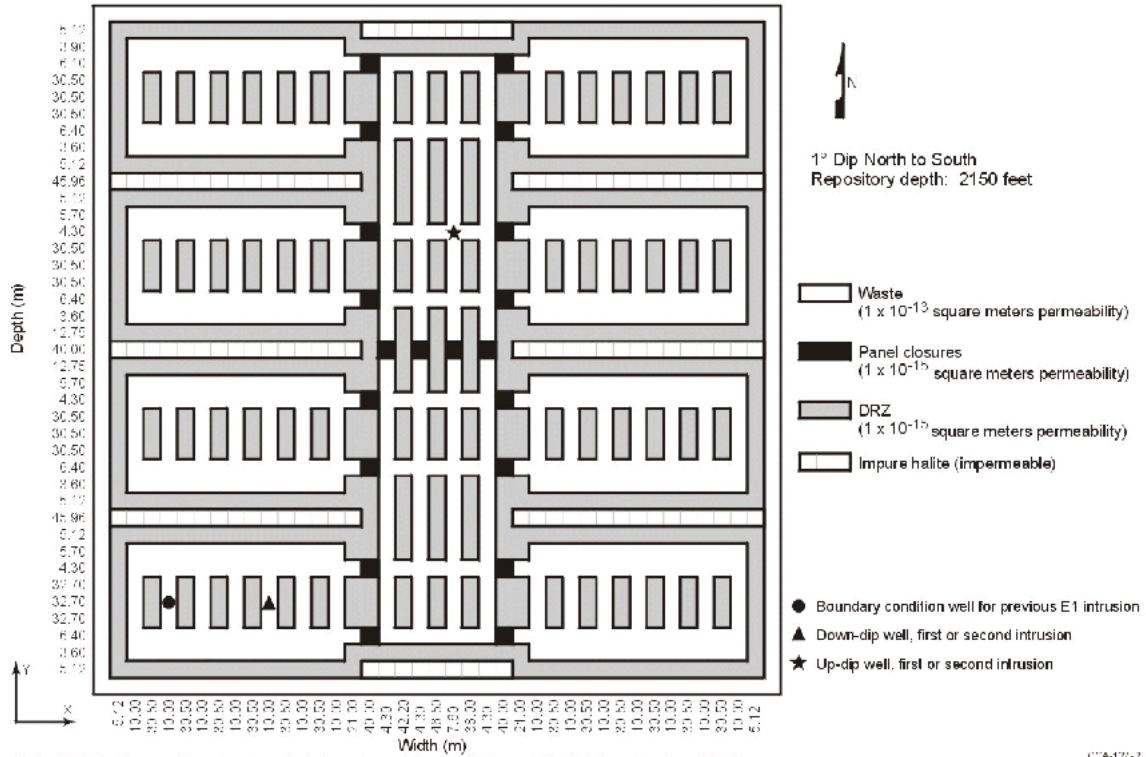


Figure 6-24. Repository-Scale Horizontal BRAGFLO Mesh Used for Direct Brine Release Calculations

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**Table 6-25. Intrusion Borehole Properties for the BRAGFLO and CUTTINGS\_S Models**

Parameter (units)	Maximum	Minimum	Median or Constant <sup>a</sup>
Permeability of open hole (0 to 200 years) (square meters)	—	—	$10^{-9}$
Permeability of concrete plugs (0 to 200 years in Rustler and at surface) (square meters) <sup>b</sup>	—	—	$5 \times 10^{-17}$
Permeability of borehole fill material (>200 years) (square meters) <sup>b</sup>	$1 \times 10^{-11}$	$1 \times 10^{-14}$	$3.16 \times 10^{-13}$
Permeability of lower borehole fill material (>1,200 years) (square meters) <sup>b</sup>	$1 \times 10^{-12}$	$1 \times 10^{-15}$	$3.16 \times 10^{-14}$
Effective Porosity (percent)	—	—	0.32
Pore Compressibility (1/pascals)	—	—	0
Diameter (meters)	—	—	0.311
Threshold Pressure, $P_t$ (pascals)	—	—	0
Pore Distribution Parameter, $\lambda$ (unitless)	—	—	0.94
Residual Brine Saturation, $S_{br}$ (unitless)	—	—	0
Residual Gas Saturation, $S_{gr}$ (unitless)	—	—	0
Effective Shear Resistance to Erosion (pascals)	0.05	10.0	5.03
Waste Particle Diameter (meters)	$4 \times 10^{-5}$	0.20	$2.83 \times 10^{-3}$

<sup>a</sup> Parameters with no maximum and minimum values are treated as constants in the performance assessment.

<sup>b</sup> Borehole permeabilities are for the two-plug case. Continuous three-plug case is treated as undisturbed performance.

continuous plug is to protect potash mining operations from possible hydrocarbon contamination. A continuous concrete plug is also used to approximate flow in boreholes in which numerous concrete plugs are found throughout the salt section. Examples of such plugging configurations currently used in the Delaware Basin are described in Appendix MASS (Section MASS.16.3, and MASS Attachments 16-1 and 16-3).

Because concrete within a continuous plug will be physically confined and will have very little brine flow through it, degradation will be minimal and limited to the upper and lower ends of the plug (see Appendix MASS, Section MASS.16.3.3 and MASS Attachment 16-3, Appendix C). For performance assessment, the permeability of the continuous concrete plug is  $5 \times 10^{-17}$  square meters. Because of the small cross-sectional area and low permeability of the potential pathway, long-term releases through a continuous concrete plug are not calculated explicitly for the performance assessment, and are assumed to be zero.

**6.4.7.2.2 The Two-Plug Configuration**

1 In the two-plug configuration, two concrete plugs are assumed to have a significant effect on  
2 long-term flow in the borehole (Appendix MASS, Section MASS.16.3 and MASS Attachment  
3 16-3, Figure 2). The lower plug of interest is assumed to be located somewhere between the  
4 hypothetical Castile brine reservoir and underlying formations. A second plug is located  
5 within the lower portion of the Rustler, immediately above the Salado. Additional plugs that  
6 have little effect on long-term flow are also assumed to be present deeper in the hole and at  
7 the land surface.

8  
9 In E1-type intrusions with two plugs, the brine reservoir and the repository are assumed to be  
10 in direct communication through an open cased hole immediately following drilling. The plugs  
11 are located in the borehole Region 1A of the BRAGFLO mesh in Figure 6-14 in Rows 30 and  
12 31 (the surface plug) and Row 23 (the lower unnamed member). The plugs located below the  
13 brine reservoir are not modeled explicitly. Plugs are assigned initial permeabilities of  $5 \times 10^{-17}$   
14 square meters, consistent with the expected properties of intact concrete (see Appendix  
15 MASS, Section MASS.16.3.2 and MASS Attachment 16-3, Appendix C.3.1.2 [C-4]). The  
16 open segments of borehole between the plugs are assigned an initial permeability of  $10^{-9}$   
17 square meters. Steel casing above the Salado is assumed to begin to degrade within decades  
18 after abandonment and is assumed to have failed completely after 200 years. The concrete  
19 plugs above the Salado are also assumed to fail after 200 years, as a result of chemical  
20 degradation where they are in contact with brine. The plug below the Castile brine reservoir  
21 is in a less aggressive chemical environment, and its properties remain constant in  
22 performance assessment.

23  
24 After the upper plugs and casing have failed, the borehole is assumed to be filled by a silty-  
25 sand-like material containing degraded concrete, corrosion products, and material that sloughs  
26 into the hole from the walls. Thus, beginning 200 years after the time of intrusion, the entire  
27 borehole region in the BRAGFLO model, including the sections previously modeled as  
28 concrete plugs, is assigned a permeability corresponding to silty sand. This permeability is  
29 sampled from a log-uniform distribution from  $10^{-11}$  square meters to  $10^{-14}$  square meters.

30  
31 One thousand years after the plug at the base of the Rustler has failed, or 1,200 years after the  
32 time of intrusion, permeability of the borehole region below the waste-disposal panel in the  
33 BRAGFLO model used for E1-type intrusions is decreased from its sampled value by one  
34 order of magnitude. For the remainder of the 10,000-year period, the borehole is modeled  
35 with its sampled permeability value above the repository and the adjusted value below.  
36 Conceptually, the decrease in permeability below the panel corresponds to compaction of the  
37 silty-sand-like material by partial creep closure of the lower portion of the borehole. As  
38 discussed in Appendix MASS (Section MASS.16 and MASS Attachment 16-3, Appendix D),  
39 creep closure of boreholes is not expected to be significant above the repository horizon but  
40 will be effective at greater depths because of the greater lithostatic stress. Nowhere in the  
41 borehole is creep closure assumed to close the hole completely in the regulatory time frame,  
42 but closure will be sufficient at depths below the repository to reduce the permeability of the  
43 material filling the hole.

#### 44 45 *6.4.7.2.3 The Three-Plug Configuration*

1 In the three-plug configuration, three concrete plugs are assumed to have an effect on long-  
2 term flow in the borehole (Appendix MASS, Section MASS.16.3 and MASS Attachment 16-3,  
3 Figure 3). Two of the plugs are identical to those modeled in the two-plug configuration. The  
4 third plug is located within the Castile above the brine reservoir and below the waste-disposal  
5 panel. This plug is assumed to behave in the same manner as the lower plug in the two-plug  
6 configuration: that is, its properties remain unchanged in performance assessment. Otherwise,  
7 all portions of the borehole in the three-plug configuration are assumed to have the same  
8 material properties as the corresponding regions in the two-plug configuration, with  
9 adjustments to borehole-fill permeability occurring 1,000 years after failure of the overlying  
10 plug (Appendix MASS, Section MASS.16.3 and MASS Attachment 16-3, Section 5.3).

11  
12 Because the three-plug configuration isolates the repository from the brine reservoir for the  
13 time period during which the middle plug remains effective and because the portion of the  
14 borehole above the middle plug will already be filled with silty-sand-like material before  
15 failure of the middle plug occurs, the DOE has chosen not to model this configuration  
16 explicitly in the BRAGFLO calculations. Boreholes in which the three-plug configuration is  
17 emplaced are assumed to result in long-term releases comparable to those calculated for E2  
18 intrusions, regardless of whether they penetrate a Castile brine reservoir. Consequences of  
19 E1-type intrusions with the three-plug configuration are assumed for the purposes of CCDF  
20 construction to be identical to the consequences of E2 intrusions occurring at the same time.

#### 21 22 **6.4.8 Castile Brine Reservoir**

23  
24 As discussed in Section 2.2.1.2.2, high-pressure Castile brine has been encountered in several  
25 WIPP-area boreholes, including the WIPP-12 borehole within the controlled area and the U.S.  
26 Energy Research and Development Administration (ERDA)-6 borehole northeast of the site.

27  
28 The E1 and E1E2 scenarios include penetration by a borehole of the repository and a brine  
29 reservoir in the Castile. The properties of the borehole are discussed in Section 6.4.7.

30  
31 For performance assessment, the Castile is conceptualized as unimportant because of its  
32 expected low permeability (based on similarities to the Salado), unless a borehole penetrates  
33 both the repository and a brine reservoir in the Castile. Two regions are specified in the  
34 Castile horizon in the disposal system geometry: the Castile (Region 29 in Figure 6-13) and a  
35 reservoir (Region 30 in Figure 6-13). The Castile region is assigned an extremely low  
36 permeability, which prevents it from participating in fluid flow processes, consistent with the  
37 concept that it is unimportant.

38  
39 It is not known whether a brine reservoir actually exists below the repository. Because of this  
40 fact, the conceptual model for the brine reservoirs is somewhat different from those for  
41 known major properties of the natural barrier system, such as stratigraphy. The principal  
42 difference is that a reasonable treatment of the uncertainty of the occurrence of brine  
43 reservoirs requires that assumptions be made about their spatial distribution and probability of  
44 intersection (Appendix MASS, Section MASS.18.1 and MASS Attachment 18-6). These  
45 properties are treated as stochastic uncertainty in performance assessment modeling (that is,



1 they are related to whether a brine reservoir exists and whether a brine reservoir intersection  
2 occurs; see Section 6.1.2). These assumptions are discussed in Section 6.4.12.

3  
4 In addition to the stochastic uncertainty in the location and probability of intersecting  
5 reservoirs, there is also uncertainty in the properties of reservoirs if they are intersected  
6 (Appendix MASS, Section MASS.18 and MASS Attachments 18-2 and 18-3). This is treated  
7 as subjective uncertainty (that is, it is related to the question, If a brine reservoir is assumed to  
8 be penetrated, how does it behave?; see Section 6.1.2) and is incorporated in the BRAGFLO  
9 calculations of disposal system performance. The conceptual model for the behavior of the  
10 hypothetical brine reservoir is discussed here.

11  
12 Where they exist, Castile brine reservoirs in the northern Delaware Basin are believed to be  
13 fractured systems, with high-angle fractures spaced widely enough that a borehole can  
14 penetrate through a volume of rock containing a brine reservoir without intersecting any  
15 fractures and therefore not produce brine. They occur in the upper portion of the Castile  
16 (Popielak et al. 1983, G-2). Appreciable volumes of brine have been produced from several  
17 reservoirs in the Delaware Basin, but there is little direct information on the areal extent of the  
18 reservoirs or the interconnection between them. The WIPP-12 data indicate that fractures in  
19 the network have a variety of apertures and permeabilities, and they deplete at different rates.  
20 Brine occurrences in the Castile behave as reservoirs—that is, they are bounded  
21 systems—rather than as aquifers such as groundwater in the Culebra and Magenta. The  
22 properties that need to be specified for brine reservoirs are pressure, permeability,  
23 compressibility, total brine volume, and porosity.

24  
25 Brine reservoir pressure in this performance assessment is based on measured pressure in  
26 anhydrites in the Castile and Salado. The values used in this performance assessment are  
27 shown in Table 6-26. These values are determined by analysis of pressures observed in brine  
28 produced from anhydrites in the Salado and Castile, corrected for the difference in depth  
29 between the observation location and WIPP-12. The analysis is documented in Appendix  
30 MASS (Section MASS.18 and MASS Attachments 18-1 and 18-2) and Appendix PAR  
31 (Parameter 27).

32  
33 The permeability of brine reservoirs is based on analysis of brine reservoirs tested by the DOE  
34 in drillholes ERDA-6 and WIPP-12 (Popielak et al. 1983, Sections H-3.4.3 and H-3.4.4).  
35 Values used in this performance assessment are shown in Table 6-26. The derivation of these  
36 values from the referenced study is documented in Appendix PAR (Parameter 28).

Table 6-26. Parameter Values Used for Brine Reservoirs in the BRAGFLO Calculations

Parameter (units)	Maximum	Minimum	Median or Constant <sup>a</sup>
Permeability (square meters)	$1.58 \times 10^{-10}$	$2.0 \times 10^{-15}$	$1.58 \times 10^{-12}$
Effective Porosity (percent)	-	-	0.87
Rock Compressibility (1/pascals) <sup>b</sup>	$10^{-8}$	$5.0 \times 10^{-12}$	$10^{-10}$
Initial Pressure (pascals)	$1.70 \times 10^7$	$1.11 \times 10^7$	$1.27 \times 10^7$
Threshold Pressure, $P_t$ (pascals) <sup>c</sup>	$4.59 \times 10^{-6}$	$2.28 \times 10^{-4}$	$4.6 \times 10^{-5}$
Pore Distribution Parameter, $\lambda$	-	-	0.70
Residual Brine Saturation, $S_{br}$ (unitless)	-	-	0.20
Residual Gas Saturation, $S_{gr}$ (unitless)	-	-	0.20
Maximum Capillary Pressure (pascals)	-	-	$10^8$
Brine Volume (cubic meters)	160,000	32,000	80,000 <sup>d</sup>

<sup>a</sup> Parameters with no maximum and minimum values are treated as constants in the performance assessment.

<sup>b</sup> Pore compressibility = rock compressibility/effective porosity.

<sup>c</sup> Threshold Pressure ( $P_t$ ) determined from the relationship:  $PCT\_A \cdot k^{PCT\_EXP}$ , where  $PCT\_A$  and  $PCT\_EXP$  are constants and  $k$  is the permeability.

<sup>d</sup> There is equal probability of a brine volume less than 80,000 or greater than 80,000 cubic meters. However, 80,000 cubic meters is not a brine reservoir volume allowed in the model. See Appendix PAR.

The compressibility of brine reservoirs is based on analysis (Appendix MASS and MASS Attachment 18-2) of data collected from the WIPP-12 brine reservoir (Popielak et al. 1983, G-33). Values used in this performance assessment are shown in Table 6-26. The derivation of these values is documented in Appendix PAR (Parameter 29). The range for Castile brine reservoir compressibility used in BRAGFLO is broad. This range was selected in an attempt to ensure that all possible values are encompassed. Because the volume of brine that could be produced from a reservoir depends heavily upon the compressibility assumed, the brine volumes generated by the model reasonably bound those that would be produced from a Castile brine reservoir that could exist directly below the waste panels.

The brine reservoir volume is based on WIPP-12 observations and consideration of the effects of drilling 46.8 boreholes per square kilometer in the next 10,000 years in the vicinity of the site. The interconnectivity, or extent, of a fractured reservoir is uncertain. Analysis of WIPP-12 data has led to estimates of the effective radius of reservoirs from several hundred meters to several kilometers (Appendix MASS, Section MASS.18.1 and MASS Attachment 18-3), where the effective radius is the area over which the fractured network of a single reservoir extends. Reservoirs interpreted as smaller have effective radii on the order of several hundred meters—in other words, dimensions somewhat smaller than the waste panel. This interpretation is generally supported by geophysical survey data (see Section 6.4.12.6 and Appendix MASS, Section MASS.18.1 and MASS Attachment 18-5). Reservoirs interpreted as large have effective radii much larger than the waste panel dimensions, or even the site dimensions. The DOE assumes that reservoirs that may exist under the waste panels have

1 limited extent and interconnectivity, with brine volumes consistent with the lower values  
2 estimated from the WIPP-12 encounter. The basis for this assumption is discussed in the  
3 following paragraphs.

4  
5 Consistent with regulatory criteria in 40 CFR § 194.33(b)(3) regarding the rate of drilling used  
6 in performance assessment, the DOE assumes that 46.8 deep boreholes may be drilled per  
7 square kilometer in the next 10,000 years. This drilling rate implies nearly 40-acre spacing of  
8 boreholes in the vicinity of the WIPP in 1,000 years, and nearly 5-acre spacing of boreholes at  
9 the end of 10,000 years. Even with limited probability of intersecting a brine reservoir  
10 (Section 6.4.12.6), there should be approximately one intersection per 480 acres in 1,000  
11 years, and approximately one intersection per 48 acres in 10,000 years. Every time a  
12 reservoir of abnormally pressurized brine is penetrated, its pressure is partially depleted.  
13 Abnormally pressurized brine is defined as exhibiting pressure that exceeds the anticipated  
14 hydrostatic pressure for that depth. If reservoirs are well interconnected, they will be  
15 penetrated and partially depleted many times during 10,000 years until penetrating a reservoir  
16 no longer produces flow. If reservoirs are poorly interconnected, regions of pristine reservoirs  
17 could persist, although these would have lower producible brine volumes because of their  
18 limited extent.

19  
20 There is an area in which potential brine reservoirs cannot be penetrated and depleted for  
21 some time—under the waste panels while passive institutional controls are effective. The  
22 passive institutional controls shield a region of the Castile from exploratory drilling. If brine  
23 reservoirs are well interconnected, the sheltered region could be depleted by the effects of  
24 multiple penetrations occurring in unprotected areas. If brine reservoirs are poorly  
25 interconnected, they could persevere under pristine conditions under the panels. The DOE  
26 considers that there are two reasonable conceptual models consistent with the drilling rate for  
27 the future condition of brine reservoirs in the WIPP region: (1) they are interconnected over  
28 large areas and penetrated and partially depleted many times; and (2) they are interconnected  
29 over small areas and not affected by the penetrations that occur outside but near the waste-  
30 area footprint. The DOE assumes that brine reservoirs potentially under the waste panels are  
31 poorly interconnected hydraulically (with extents similar to the lower estimates from  
32 WIPP-12), not much affected by penetrations occurring outside but near the waste-area  
33 footprint, and can persevere with pristine conditions until penetrated by a borehole drilled  
34 within the panel area. The DOE considers a pristine-condition, smaller reservoir to have  
35 potentially greater consequences than a depleted large reservoir.

36  
37 The distribution of brine volumes assumed in performance assessment for determining the  
38 consequence of first penetration of a brine reservoir has five values: 32,000, 64,000, 96,000,  
39 128,000, and 160,000 cubic meters (see Appendix MASS, Section MASS.18 and MASS  
40 Attachment 18-3). The smallest volume, 32,000 cubic meters, is the minimum volume from  
41 an analysis of WIPP-12 data (see Appendix MASS, MASS Attachment 18-3). Because this  
42 WIPP-12 reservoir volume represents an estimated effective area of about one-third of the  
43 waste panel area and because a reservoir larger than the minimum WIPP-12 volume could  
44 reasonably exist under the waste panels, the DOE also considers larger reservoir volumes in  
45 performance assessment. In BRAGFLO, the brine volume is placed in a region of rock of

1 constant dimensions. The porosity of the constant rock volume is set such that it contains  
2 pore volume equal to the reservoir brine volume. The porosity used for the largest reservoir is  
3 shown in Table 6-26. Porosities for smaller reservoirs are adjusted to yield the appropriate  
4 volume.

5  
6 The BRAGFLO calculations develop reference system behavior for possible future events.  
7 BRAGFLO calculations of the E1 scenario are executed for every vector. In the calculations,  
8 it is assumed that a brine reservoir exists beneath the waste panels, and it is assigned  
9 properties from LHS. Because there is a probability associated with the occurrence of a brine  
10 reservoir, there may be no penetration of a brine reservoir in a randomly determined sequence  
11 of future events. In this case, the BRAGFLO reference-condition results for a brine reservoir  
12 penetration are not used. The probability assigned to penetrating a brine reservoir is discussed  
13 in Section 6.4.12.6 and Appendix MASS (Section MASS.18 and MASS Attachment 18-6).

#### 14 15 **6.4.9 Climate Change**

16  
17 The present climate at the WIPP and the geologic record of past climate change in  
18 southeastern New Mexico are discussed in Section 2.5 and Appendix CLI. Although  
19 meaningful quantitative predictions of future climate for the next 10,000 years are not feasible  
20 for the WIPP (or any location), effects of reasonably possible climate changes on disposal  
21 system performance must be considered. For the WIPP, uncertainty about these effects is  
22 incorporated in the performance assessment by considering the effects of various possible  
23 future climates on groundwater flow and potential radionuclide transport in groundwater.  
24 Direct effects of climate change that do not involve groundwater flow do not affect the long-  
25 term performance of the WIPP because of its depth below the land surface. Examples of  
26 such direct effects are changes in wind patterns, thermal effects related to changes in surface  
27 temperature, and near-future impacts on surface facilities. Long-term effects of climate  
28 change on the near-surface portions of the shaft seal system (see Section 6.4.4) are not  
29 incorporated in the analysis because BRAGFLO modeling conducted for this performance  
30 assessment indicates that system performance is unaffected by the behavior of the upper  
31 portion of the shaft seal system. Additional aspects of climate change screened out from the  
32 performance assessment, including glaciation at the site and possible future anthropogenic  
33 changes, are discussed in Appendix SCR (Sections SCR.1.6.2 and SCR.3.6.1).

34  
35 The effects of postulated climate change on groundwater flow have been evaluated outside of  
36 the performance assessment calculations using a regional three-dimensional groundwater  
37 basin model based on the concept of basin hydrology introduced in Section 2.2.1.1. For the  
38 purposes of the regional analysis, climate-related factors that might affect groundwater flow,  
39 such as precipitation, temperature, and evapotranspiration, are treated through a single model  
40 parameter, potential recharge, which controls the rate at which water is added to the model at  
41 the water table. As described in Appendix MASS (Section MASS.17 and MASS Attachment  
42 17-1), changes in this parameter allow simulation of regional groundwater flow under a range  
43 of different future states in which the climate may be wetter, the water table may be higher,  
44 and groundwater velocity in all units may increase. These and other simulations discussed in  
45 Appendix MASS (Section MASS.15 and MASS Attachment 15-7), show that the regional,

1 three-dimensional effects of climate change can be reasonably approximated in performance  
 2 assessment through direct scaling of specific discharge in the two-dimensional, steady-state  
 3 groundwater velocity field for the Culebra. The velocity field is calculated using SECOFL2D,  
 4 as described in Section 6.4.6.2 and Appendix CODELINK (Section CODELINK.6.4).  
 5 Radionuclide transport in the Culebra is then calculated by SECOTP2D using the scaled  
 6 velocity fields.

7  
 8 Scaling of the two-dimensional velocity field is done using the Climate Index (Table 6-27),  
 9 which is a dimensionless factor by which the specific discharge in each grid block of the  
 10 SECOFL2D domain is multiplied. As summarized in Appendix PAR (Parameter 48), the  
 11 Climate Index is a sampled parameter in the performance assessment, with a bimodal  
 12 distribution ranging from 1.00 to 1.25 and from 1.50 to 2.25. A single value of the Climate  
 13 Index is chosen in LHS for each sample element and held constant throughout the 10,000-  
 14 year SECOFL2D simulation. Each realization of disposal system performance thus represents  
 15 a different approximation of future climate. Those realizations in which the sampled value is  
 16 close to its maximum of 2.25 represent the most extreme changes in groundwater flow that  
 17 may result from climatic change.

**Table 6-27. Climate Change Properties for the SECOFL2D Model**

Parameter (units)	Maximum	Minimum	Median
Climate Index (dimensionless)	2.25	1.00	1.17

23  
 24  
 25 Sampled values close to the minimum of 1.00 represent climatic changes that have little effect  
 26 on groundwater-flow velocities. Because all sampled values of the Climate Index are greater  
 27 than 1.00, climate change as implemented in the performance assessment can only increase  
 28 the rate of groundwater flow.

29  
 30 The distribution assigned to the Climate Index parameter is based on the results of three-  
 31 dimensional basin modeling that considers future changes in the temporal pattern of potential  
 32 recharge (see Appendix MASS, Section MASS.17 and MASS Attachment 17-1, Section F).  
 33 Potential recharge is defined for the purposes of the regional modeling to be the maximum  
 34 rate at which water can be added at the water table. Recharge itself is a model result and  
 35 ranges from zero to the potential recharge. For those areas where the water table is at the  
 36 ground surface and modeling indicates that water is discharging to the land surface through a  
 37 seepage face, the potential recharge does not enter the model and has no effect on  
 38 groundwater flow. In areas where the water table is below the land surface, potential  
 39 recharge becomes actual recharge and tends to cause the elevation of the water table to rise.  
 40 If potential recharge is zero, the water table in an idealized basin will tend to fall until it is a  
 41 horizontal plane with an elevation equal to the lowest topographic point in the basin.  
 42 Sufficiently large values of potential recharge will cause the water table to rise to the land  
 43 surface everywhere. Smaller nonzero values result in solutions with water tables that are at  
 44 the land surface at topographic low points (discharge areas) and at some distance below the

1 land surface at topographic highs (recharge areas). Changes in potential recharge cause the  
2 elevation of the water table to rise or fall. In the three-dimensional modeling of the WIPP  
3 region, potential recharge was assumed to be spatially invariant across the regional model  
4 domain and is assumed to change through time in response to changes in climate.  
5

6 Both steady-state and transient three-dimensional regional analyses have been executed with  
7 values of potential recharge varied such that the elevation of the water table ranged from  
8 approximately its present position to at or near the land surface. The latter condition provides  
9 an upper bound for regional groundwater-flow velocities during future wetter climates. For all  
10 simulations examining the effects of climate change, recharge is assumed to be greater at  
11 some time in the future than it is at present. Present recharge is assumed to be the same as its  
12 minimum value during the Holocene. The dominant effects on climate change during the next  
13 10,000 years are assumed to be natural rather than anthropogenic. This assumption is  
14 consistent with regulatory guidance provided by the EPA indicating that consideration of the  
15 effects of climate change should be limited to natural processes (EPA 1996a, 61 FR 5227).  
16

17 Because of uncertainty about recharge rates during future wet periods and the timing of these  
18 periods, transient analyses use two fundamentally different patterns for the change in potential  
19 recharge. The first pattern for future potential recharge used in the analysis corresponds to a  
20 continuation of the inferred climate patterns of the Holocene (see Section 2.5.1 and Appendix  
21 CLI, Section 3), with wetter peaks occurring 500, 2,000, 4,000, 6,000, 8,000, and 10,000  
22 years in the future. Potential recharge is assumed to increase and decrease linearly during the  
23 wet periods 500 years before and after the peaks, and the wet periods are each separated by  
24 1,000 years of a drier climate like that of the present. Several different values were examined  
25 for the maximum potential recharge imposed at the wet peaks, with the largest value chosen  
26 to provide a steady-state solution with the water at, or close to, the land surface throughout  
27 the model domain. As discussed in Appendix MASS (Section MASS.17 and MASS  
28 Attachment 17-1, Section F), a continuation of the Holocene climatic variability is considered  
29 likely during the next 10,000 years, and this function is assigned a relatively high probability  
30 of occurrence (0.75). This recharge function and its probability of occurrence are reflected in  
31 the lower portion of the bimodal distribution assigned to the Climate Index parameter.  
32

33 The second recharge pattern considered in the analysis assumes that potential recharge will  
34 increase from its present value to a specified larger value 500 years in the future and that  
35 potential recharge will then remain constant throughout the rest of the 10,000-year simulation.  
36 As with the Holocene pattern, several different values were examined, with the largest being  
37 sufficient to result in a steady-state solution with the water table at, or close to, the land  
38 surface throughout the model domain. Conceptually, this pattern corresponds to a future in  
39 which the climate either becomes continuously wetter or the frequency of wetter periods  
40 becomes sufficiently large that the hydrologic response is indistinguishable from that of a  
41 continuously wetter climate. Step-increase recharge functions were used to simulate the  
42 effects of major disruptions of the Holocene climate, analogous to those that might occur  
43 during the next 10,000 years in a transition from the present warm interglacial climate to the  
44 early stages of a future glacial climate. As discussed in Appendix MASS (Section MASS.17),  
45 such disruptions to the Holocene climate are considered unlikely, and the step function is

1 assigned a relatively low probability of occurrence (0.25). This recharge pattern and its  
2 probability of occurrence are represented by the upper portion of the bimodal distribution  
3 assigned to the Climate Index parameter.  
4

5 As reported in Appendix MASS (Section MASS.17 and MASS Attachment 17-1, Section E),  
6 17 transient and 54 steady-state, regional three-dimensional groundwater-flow simulations  
7 were run to examine effects of climate change. Simulations considered both potential  
8 recharge functions with varying peak recharge rates and different sets of assumptions about  
9 regional rock properties. Total specific discharge into and out of the Culebra within a model  
10 region approximately corresponding to the controlled area was calculated for each simulation.  
11 Values for the Climate Index parameter were determined by comparing the total lateral  
12 specific discharge calculated for each simulation. The largest observed increase in flow for  
13 those simulations using realistic values of rock properties was a factor of 2.1. Although some  
14 simulations produced a slight reduction in flow, Climate Index parameter values less than 1.0  
15 are not considered in the performance assessment. Changes in flow direction in the Culebra  
16 were also noted in some three-dimensional simulations, with a shift in flow toward the west  
17 corresponding to a regional increase in the elevation of the water table. These potential  
18 changes in flow direction are not incorporated in the two-dimensional flow and transport  
19 modeling to simplify the computational process. This treatment is conservative with respect  
20 to radionuclide transport because the most rapid transport possible under any climate  
21 conditions will be through the most conductive portion of the Culebra south and east of the  
22 repository. Any shift of the flow direction away from this high conductivity zone would result  
23 in slower transport through less permeable rock. Restricting the effects of climate change to a  
24 uniform linear scaling of specific discharge in the SECOFL2D model is, therefore, a  
25 conservative assumption.  
26

#### 27 **6.4.10 Initial and Boundary Conditions for Disposal System Modeling**

28  
29 The solution of many mathematical models used in performance assessment requires  
30 specification of a starting point, called initial conditions, and specification of how the region  
31 modeled (that is, volume) interacts with the regions not modeled, called boundary conditions.  
32 Initial values are required for all of the parameters appearing in a computer code. In practice,  
33 however, the term initial conditions refers to the values assigned to the primary variables used  
34 to describe the system, examples of which may be pressure, composition, and saturation. The  
35 term boundary conditions refers to the specification of primary variables that control the  
36 interaction of the modeled region with the regions excluded from the model. In many studies,  
37 applied boundary conditions are static in time, although computer codes that implement time-  
38 dependent boundary conditions are not uncommon. A common practice in modeling  
39 groundwater flow is to place boundaries of the modeled system somewhat distant from the  
40 region in which model results are of interest. This is done to help ensure that uncertainty in  
41 the natural boundaries of the system does not unduly influence model results in the region of  
42 interest. The DOE adopts this practice in its application of BRAGFLO and SECOFL2D to the  
43 WIPP.  
44

1 The following sections describe the initial and boundary conditions specified for the major  
2 codes used in this performance assessment. Initial values of parameters not discussed in the  
3 following sections are set equal to the values assigned from the performance assessment  
4 database or LHS sampling that are discussed elsewhere in Section 6.4.

5  
6 6.4.10.1 Disposal System Flow and Transport Modeling (BRAGFLO and NUTS)

7  
8 In BRAGFLO, initial conditions for the simulation of the regulatory period are consistent with  
9 the following: (1) there are no gradients for flow in the far-field Salado; (2) Salado far-field  
10 pore pressures are elevated above hydrostatic from the surface but below lithostatic; and  
11 (3) near the repository, excavation and waste emplacement results in partial drainage of the  
12 DRZ and subsequent evaporation of drained brine into mine air, and then removal from the  
13 modeled system by air exchanged to the surface. The term far-field used above refers to the  
14 region that is not influenced by the drainage of the DRZ mentioned in (3). For units above the  
15 Salado, initial pressures are set to be consistent with observed pore pressures or normal  
16 hydrostatic gradients.

17  
18 Estimating the effects of drainage of the DRZ that occurs during the operational period,  
19 (3) above, is not simple. For each vector sampled in LHS, the DOE estimates this by using  
20 BRAGFLO to simulate a period of time representing disposal operations. This calculation is  
21 called the start-up simulation and covers five years from  $t = -5$  years to  $t = 0$  years,  
22 corresponding to the amount of time a typical panel is expected to be open during disposal  
23 operations. Most of the initial parameters used during the regulatory period simulation ( $t = 0$   
24 to  $t = 10,000$  years) are also assigned for the start-up simulations, with some exceptions that  
25 are described below.

26  
27 The initial pressures in the Salado for the start-up simulation are calculated based on a  
28 sampled pressure at the elevation of MB139 at the shaft and adjusted throughout the Salado  
29 and the DRZ to account for changes in hydraulic head due to elevation change. This  
30 parameter is discussed in Appendix PAR (Parameter 26). This adjustment assumes  
31 hydrostatic equilibrium. The DRZ permeability is set at  $10^{-17}$  square meters for the start-up  
32 simulation. Based on observed changes in the DRZ, the DRZ porosity is adjusted upwards  
33 0.0029 (0.29 percent) from the sampled value for intact impure halite. Initial pressure for the  
34 start-up simulation in the excavated regions is set to atmospheric. The shaft exists and is  
35 modeled as unfilled with the same physical properties as the excavation.

36  
37 For the start-up simulation, an initial water-table surface is specified within the Dewey Lake  
38 at an elevation of 3,215 feet (980 meters) above mean sea level. This elevation is consistent  
39 with observations discussed in Section 2.2.1.4.2.1. Above the water table, pressure is  
40 maintained at one atmosphere, 0.101 megapascals; liquid saturations in these computational  
41 cells are held constant at residual liquid saturation (Section 6.4.6.6, Table 6-23). Below the  
42 water table initial liquid saturations in all regions except the repository and shaft are 100  
43 percent. Pressures are set consistent with a hydrostatic gradient below the water table within  
44 the Dewey Lake, as well as in the Rustler except for the Magenta and Culebra. An initial  
45 pressure for the Culebra is set at 0.822 megapascals, based on fluid level and fluid density



1 data collected at H-1, H-2B, H-3, H-4B, H-5B, H-6B, P-14, P-15, and P-17. An initial  
2 pressure of 0.917 megapascals is specified for the Magenta, calculated from fluid level and  
3 fluid density data from H-1, H-2A, H-3, H-4A, H-5A, and H-6A (Dotson 1996). Even though  
4 the natural properties of the units above the Salado vary considerably over the domain  
5 modeled by BRAGFLO, the BRAGFLO initial condition of constant pressure and constant  
6 properties for each layer is considered reasonable because the purpose of the BRAGFLO  
7 calculation with respect to these units is to calculate the long-term flux of brine from the  
8 borehole or shaft to each unit, or to the surface. For this purpose, the pressure and properties  
9 at the borehole or shaft are important, but details of regional hydraulic head and unit  
10 properties are not.

11  
12 For the start-up simulation, permeabilities of all units above the Salado are set to zero so that  
13 flow cannot occur from these units into the shaft. This modeling assumption is adopted as a  
14 simple method of accounting for the existence of effective liners in the shafts during disposal  
15 operations.

16  
17 For the start-up simulation, no-flow boundary conditions are assigned in the BRAGFLO  
18 model of the disposal system along all of the exterior boundaries of the computational mesh  
19 except at the far field boundaries of the Culebra and Magenta and the top of the model (that  
20 is, the surface of the ground). These boundaries are 20 kilometers from the edge of the land  
21 withdrawal area boundary, as discussed in Section 6.4.2.1. The ground surface is maintained  
22 at atmospheric pressure. The boundaries of the Culebra and Magenta are maintained at  
23 pressures of 0.822 megapascals and 0.917 megapascals, respectively, corresponding to the  
24 initial pressure conditions used in the Culebra and Magenta. The pressure in the Castile brine  
25 reservoir is set at its sampled value for the start-up simulation.

26  
27 During the start-up simulation, fluid flow calculated by BRAGFLO from the Salado and the  
28 DRZ into the excavated region simulates the effect of drainage into the repository during the  
29 operational period. Following the completion of the start-up simulations, specification of  
30 initial conditions occurs for the regulatory period simulation. Boundary conditions for the  
31 regulatory period simulation are the same as those for the start-up simulation.

32  
33 The regulatory period simulation begins with conditions specified consistent with the sealing  
34 of the repository by construction of shaft seals. Certain properties assigned for the start-up  
35 simulation are changed to make model conditions consistent with the emplacement of waste  
36 and completion of sealing. The liquid saturation in the waste-disposal region of the repository  
37 is set at 0.015, which is a conservative value (Butcher 1996), and other areas of the  
38 excavation are assigned zero liquid saturation (100 percent gas saturation), regardless of the  
39 quantity of brine that may have flowed into the excavation during the start-up simulations.  
40 This is consistent with the observed ability of circulating mine air to remove any inflowing  
41 brine by evaporation. The entire repository is assigned an initial pressure of one atmosphere.  
42 Pressures and saturations in model regions representing rock remain as they were calculated  
43 to be at the end of the start-up simulation. Permeabilities of the units above the Salado are  
44 reset to the values specified for them as discussed in Section 6.4.6. The shaft is assigned  
45 properties for shaft seal materials discussed in Section 6.4.4. The pressure in the shaft is set to

1 one atmosphere, and the liquid saturation of shaft materials is set to 1.0 except in asphalt,  
2 where liquid saturation is 0 percent. Waste is emplaced in the waste-disposal regions at a  
3 density of  $1.63 \times 10^2$  kilograms per cubic meters for ferrous metals and  $6.52 \times 10^1$  kilograms  
4 per cubic meters for biodegradable materials, and other waste properties are assigned as  
5 discussed in Section 6.4.3.2. Panel closure properties discussed in Section 6.4.3.2 are assigned  
6 to the panel closure regions. Permeability in the DRZ is raised to  $10^{-15}$  square meters; this  
7 value remains constant for the regulatory period simulation. Corrosion and biodegradation  
8 reactions that produce gas are modeled to begin at the start of the regulatory period  
9 simulation, and their rates depend on the sampled parameter values for the gas generation  
10 model (see Section 6.4.3.3) and the availability of brine. Modeling of creep consolidation  
11 through the use of the porosity surface also begins at this time (see Section 6.4.3.1).  
12

#### 13 6.4.10.2 Culebra Flow and Transport Modeling (SECOFL2D, SECOTP2D)

14  
15 Groundwater flow in the Culebra is computed at both a regional and local scale. Regional-  
16 scale simulations are performed over a large domain using a computational grid that is coarser  
17 than the grid used for the local scale. The regional domain covers only a portion of the natural  
18 hydrologic system. A correct flow field can be calculated for any arbitrary part of a more  
19 extensive system if the transmissivity distribution and the values of hydraulic head assigned at  
20 the boundaries are representative of observed conditions. There is therefore considerable  
21 flexibility in choosing the locations of boundaries for the regional SECOFL2D model. Several  
22 factors were considered in selecting these boundaries. One side of the rectangular domain  
23 was aligned along a natural hydrologic feature, the axis of Nash Draw. The size of the model  
24 domain was selected such that the domain does not extend a great distance beyond the region  
25 of concentrated transmissivity and hydraulic-head data but was large enough that the imposed  
26 boundary conditions would not have a large influence on the solution in the region of interest.  
27 The results of the regional-scale simulations are used to interpolate boundary conditions at the  
28 local scale. This modeling approach allows the use of high resolution computational grids in  
29 the region of interest for computing radionuclide transport and the incorporation of a flow  
30 field representing a larger area.  
31

32 The regional domain is approximately 13.67 miles by 18.64 miles (22 kilometers by  
33 30 kilometers) and is aligned with the axis of Nash Draw along a portion of the western  
34 boundary (see Figure 6-17 in Section 6.4.6.2). Nash Draw is a highly conductive region that  
35 behaves hydraulically as a groundwater divide (see Section 2.2.1.1). Therefore, that portion  
36 of the western boundary oriented along Nash Draw is represented by a no-flow boundary.  
37 The remaining regional boundary conditions are positioned to align with topographic highs or  
38 other geologic features such as the San Simon Swale on the southeast boundary. Because of  
39 uncertainty in boundary heads, the boundaries are positioned a large distance from the local  
40 problem domain (see Figure 6-18 in Section 6.4.6.2). This is done to reduce the influence of  
41 these boundary conditions on the solution in the region of interest. Because boundary head  
42 values can be easily estimated numerically during the calibration of transmissivity fields from  
43 existing well data, Dirichlet (constant head) boundary conditions are used on these boundaries  
44 (see also the discussion in Section 6.4.6.2).  
45

1 Boundary conditions of the local domain are Dirichlet (constant-head) and derived by  
2 interpolating the solution of the regional domain. Because these boundary conditions are set  
3 by interpolation and because the simulations are steady state, Dirichlet and Neuman (specified  
4 flux) boundary conditions will provide essentially identical results, and specification of the  
5 type of boundary condition is not important.

6  
7 An initial estimate of the undisturbed head distribution is required to analyze transient well  
8 data needed to generate the transmissivity fields (see Section 6.4.6.2 and Appendix TFIELD,  
9 Section TFIELD.2.2.4). These data were obtained from hydrographs of the WIPP boreholes  
10 measured prior to the excavation of the first shaft. The hydrographs depict hydraulic heads  
11 for up to 5 years preceding shaft excavations. The transmissivity-field calibration process  
12 develops a set of boundary heads for the regional domain that are consistent with hydrograph  
13 observations and the transmissivity field generated.

14  
15 Initial conditions are not required for the Culebra flow calculations because these are steady  
16 state. Initial actinide concentrations in the transport simulations are assumed to be zero.

#### 17 18 6.4.10.3 Initial and Boundary Conditions for Other Computational Models

19  
20 In addition to BRAGFLO, SECOFL2D, and SECOTP2D, several other codes are used in  
21 performance assessment that require initial and boundary conditions. In general, these codes  
22 are strongly coupled to BRAGFLO, analogous to the manner in which SECOTP2D is coupled  
23 to SECOFL2D. These additional codes are NUTS, PANEL, the BRAGFLO direct brine  
24 release model (BRAGFLO\_DBR), and CUTTINGS\_S.

25  
26 NUTS transports radionuclides through the BRAGFLO domain based on fluid flow  
27 characteristics as calculated by BRAGFLO and, therefore, does not need explicit definition of  
28 flow boundary conditions. As actinide transport is not of concern until the repository contains  
29 waste and is sealed, a start-up simulation is not executed with NUTS. Boundary conditions  
30 for advective transport are consistent with the boundary conditions assumed for fluid flow.  
31 Molecular transport boundary conditions for NUTS simulations consist of no diffusion or  
32 dispersion in the normal direction across far-field boundaries. Initial actinide concentrations  
33 are zero in all regions except the waste. Actinide concentrations in brine in the waste regions  
34 are assigned as discussed in Section 6.4.3.5 (Table 6-11).

35  
36 PANEL is used to estimate the transport of radionuclides from the repository to the Culebra  
37 for the E1E2 scenario. PANEL assumes homogeneous mixing within a panel of the waste  
38 disposal region for determination of a source term for radionuclides. PANEL is strongly  
39 coupled to BRAGFLO, in that the flux of liquid up the borehole out of the separate panel in  
40 BRAGFLO is provided as the flux of liquid leaving the mixing volume in PANEL. Liquid  
41 leaving the mixing cell in PANEL is assumed to arrive at the Culebra, thereby maximizing the  
42 source of actinides to the Culebra.

43  
44 Models for direct release to the surface are also strongly coupled to BRAGFLO.  
45 CUTTINGS\_S (cuttings, cavings, and spall) and BRAGFLO\_DBR acquire fluid pressure, fluid

1 saturation, and other necessary quantities from the appropriate BRAGFLO disposal system  
 2 model simulation. It is assumed in the direct release models that radionuclides, once entrained  
 3 in drilling fluid, remain in the drillhole until they reach the surface. In other words, there is no  
 4 interaction between drilling fluid and the formations between the repository and the surface.  
 5 Boundary conditions in the direct brine release model are no-flow except for the sources and  
 6 sinks of brine through borehole nodes and at the surface.

7  
 8 **6.4.11 Numerical Codes Used in Performance Assessment**

9  
 10 To evaluate scenario consequences for both undisturbed and disturbed performance, the DOE  
 11 uses many computer codes to simulate relevant features of the disposal system. The flow of  
 12 information and primary roles of the codes used are discussed in this section; detailed  
 13 discussion of the individual codes is reserved for appendices, which are referenced as  
 14 appropriate. Parameter values and disposal system conditions must be passed between codes  
 15 several times in an assessment.

16  
 17 The codes are executed under the requirements of the SCMS, which creates and maintains a  
 18 complete record of the input data and results of each calculation, together with the exact  
 19 codes used to create those results. For this application, performance assessment codes used in  
 20 conjunction with LHS or random sampling were executed under the SCMS.

21  
 22 The major computer codes and the flow of information among them are illustrated in  
 23 Figure 6-25. As discussed in Section 6.1.4 and indicated in Figure 6-25, some of these codes  
 24 are used to calculate reference conditions for deterministic futures associated with the  
 25 parameters in  $\mathbf{x}_{su}$  (Equation 4b [Section 6.1.2]) and their associated uncertainty characterized  
 26 by distributions  $D_{su}$  (Equation 6b [Section 6.1.2]). The results of these codes are then used in  
 27 the construction of the consequences of probabilistic futures. There are three major steps in  
 28 evaluating scenario consequences for deterministic futures: (1) preparation of input from  
 29 submodels executed independent of LHS (for example, SANTOS, GRASP-INV), (2) LHS of  
 30 the variables  $\mathbf{x}_{su}$  in the performance assessment parameter database, and (3) execution of the  
 31 sampling-dependent performance assessment codes (those within the deterministic futures box  
 32 indicated by dashed lines in Figure 6-25).

33  
 34 Some performance assessment codes are used to calculate probabilistic futures, that is, future  
 35 events that occur randomly in time and space, and uncertainty in associated parameters in  $\mathbf{x}_{st}$   
 36 (Equation 4a [Section 6.1.2]) and their uncertainty characterized by distributions in  $D_{su}$   
 37 (Equation 6a [Section 6.1.2]). There are two major steps in evaluating scenario consequences  
 38 for probabilistic futures: (1) random sampling of the parameter database, and (2) execution of  
 39 the codes.

40  
 41 Figure 6-25 indicates only those codes that perform the bulk of the computational effort  
 42 related to simulating the significant physical processes occurring within the disposal system.  
 43 In addition to these codes, a variety of additional codes are used in this performance  
 44 assessment. These additional codes are used for the transfer of data between codes,

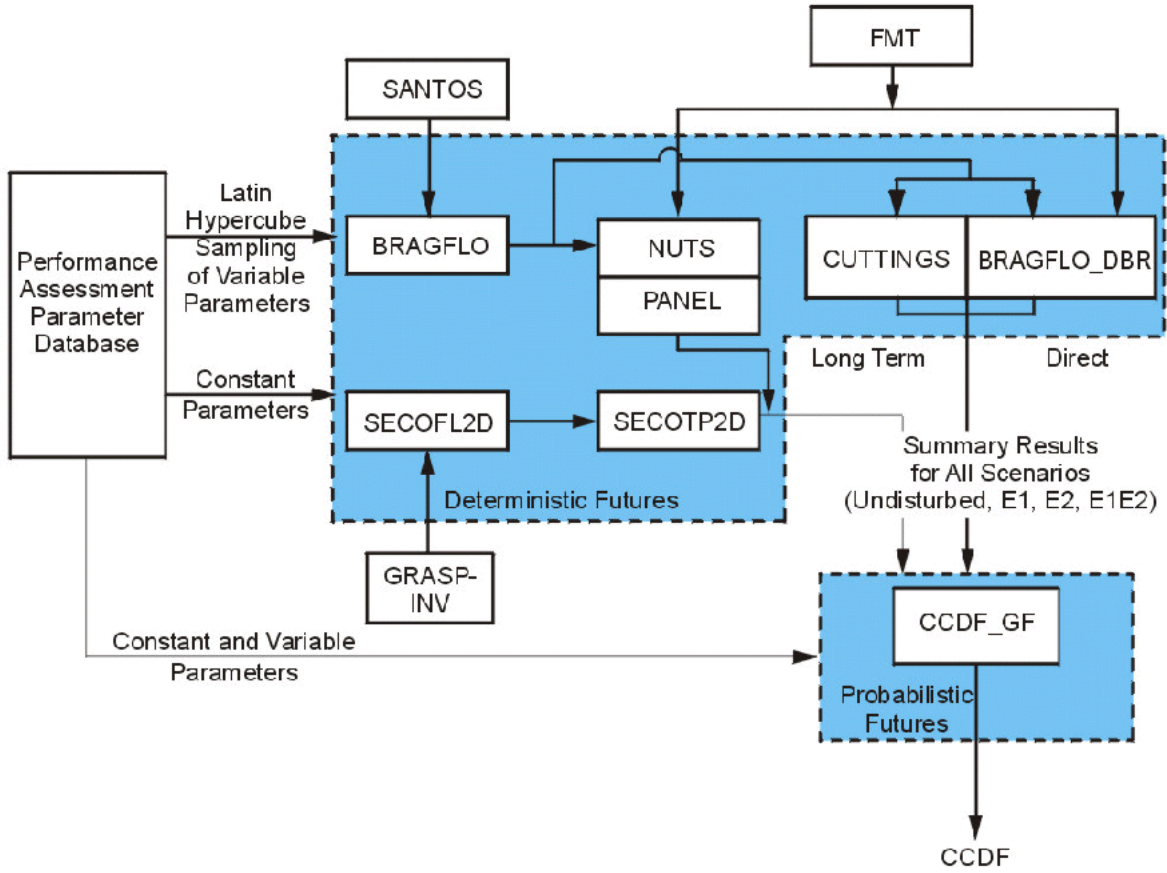
1 preparation of input files, model output processing, and similar tasks. These codes are also  
2 executed within the SCMS.

3  
4 Because these additional codes are not expressly used for simulation of physical processes,  
5 they have been omitted for clarity from discussion here and on Figure 6-25. A comprehensive  
6 description of the coupling of codes used in this performance assessment is provided in  
7 Appendix CODELINK (see Table CODELINK-1).

8  
9 Figure 6-26 shows an alternative method of visualizing how the various performance  
10 assessment codes relate to each other and to the estimation of scenario consequences. This  
11 figure represents a vertical cross section of the disposal system, associating the major codes  
12 with the particular components of the system each code simulates. As shown in the figure,  
13 BRAGFLO, SANTOS, NUTS, and PANEL address the Salado. GRASP-INV, SECOFL2D,  
14 and SECOTP2D address the Culebra. CUTTINGS\_S, BRAGFLO\_DBR, and PANEL address  
15 the immediate consequences of inadvertent human intrusion through one or more exploratory  
16 boreholes. Combined, Figures 6-25 and 6-26 illustrate the flow of information through major  
17 performance assessment codes and the relationship between the codes and the physical  
18 system being simulated.

19  
20 The parameter database is the initial element in the performance assessment process. The  
21 database includes the parameters used in performance assessment codes that pertain to the  
22 technical aspects of disposal system performance. Parameters pertaining only to the  
23 execution of the codes (for example, convergence criteria for Newton-Raphson numerical  
24 solvers) are generally not included in the database but are recorded in input files and are  
25 traceable through the SCMS. The parameters in the database fall into two categories: those  
26 that are assigned fixed values, and those that are uncertain and are therefore assigned a range  
27 of values according to a CDF.

28  
29 Vectors (sets) of parameter values are created from the uncertain variables in the database by  
30 LHS of each variable for the set of simulations comprising a performance assessment of the  
31 system. In this performance assessment, 57 parameters are sampled using LHS, and 100  
32 vectors are assembled in each replicate (see Section 6.5). The values assigned to each  
33 sampled parameter in each of the vectors in this performance assessment are included in  
34 Appendix IRES (Section IRES.1). Each of the fixed parameter values from the database and  
35 a vector of sampled parameter values are combined to form a realization (a set of input  
36 parameters). Each realization is then propagated through the performance assessment codes  
37 within the dashed lines in Figure 6-25.



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**Figure 6-25. Major Codes, Code Linkages, and Flow of Numerical Information in WIPP Performance Assessment**

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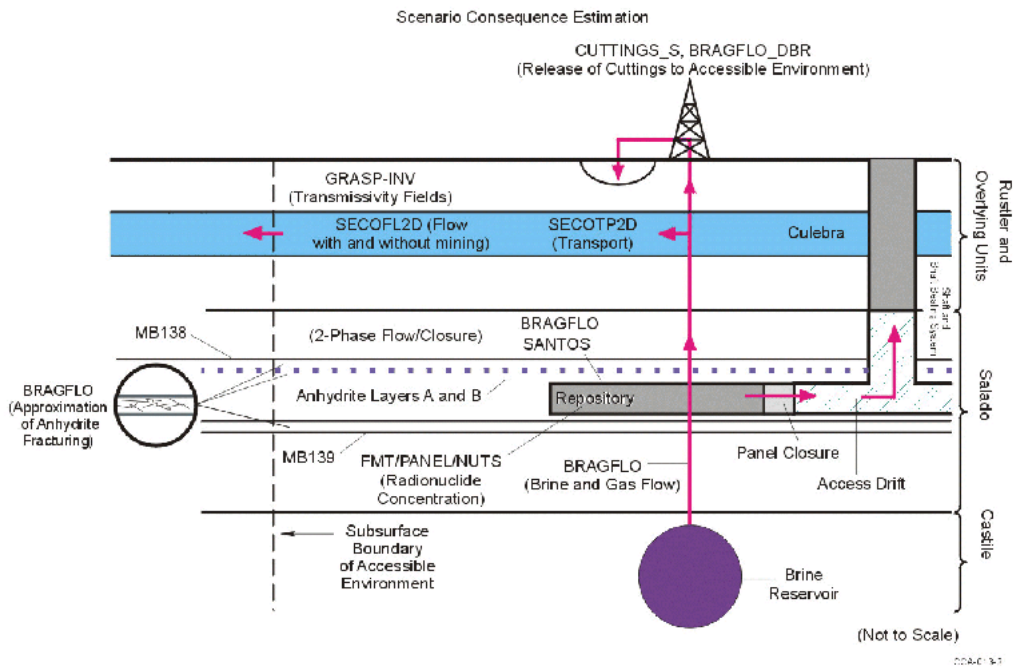


Figure 6-26. Schematic Side View of the Disposal System Associating Performance Assessment Codes with the Components of the Disposal System Each Code Simulates



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1 The assessment of each realization requires that the codes shown in Figure 6-25 for  
2 deterministic futures be executed under four code sequence configurations, one each for the  
3 undisturbed performance scenario, the E1 scenario, the E2 scenario, and the E1E2 scenario.

4  
5 Each intrusion scenario may occur with or without mining. The techniques used for each  
6 scenario are described in Section 6.4.13.

7  
8 As shown in Figure 6-25, information for some of the major codes comes from the following  
9 additional sources: the SANTOS, GRASP-INV, and FMT codes. The SANTOS code develops  
10 the porosity surface describing porosity as a function of time and pressure; this information is  
11 used in the BRAGFLO code (see Appendices BRAGFLO, Section 4.11, and PORSURF,  
12 Section PORSURF.1). GRASP-INV calculates numerous possible and equally likely Culebra  
13 transmissivity fields; these transmissivity fields are used in the SECOFL2D code (see  
14 Appendix TFIELD, Section TFIELD.4, and Appendix CODELINK, Section  
15 CODELINK.6.4). FMT is used to calculate solubility parameters that were entered into the  
16 parameter database. These parameters, as well as sampled solubility distribution parameters,  
17 were used to calculate solubilities for the performance assessment. Actinide solubility in the  
18 repository is used by the codes NUTS and PANEL.

19  
20 The performance assessment codes are executed sequentially. Following LHS, BRAGFLO is  
21 the first major code executed. Notice that the code BRAGFLO is listed twice in this  
22 sequence. BRAGFLO is used in two applications for performance assessment. In the first  
23 application, BRAGFLO calculates the overall movement of gas and brine in the repository  
24 and from the Castile to the surface; this movement forms the basis for estimating radionuclide  
25 releases to the accessible environment (Appendix BRAGFLO, Sections 4.1 through 4.9).  
26 BRAGFLO also contains subsystem models for estimating gas generation in the repository,  
27 disposal room closure and consolidation, and interbed fracturing (Appendix BRAGFLO,  
28 Sections 4.10 through 4.13). BRAGFLO does not calculate the movement of radionuclides.  
29 The second application of BRAGFLO is discussed below.

30  
31 NUTS calculates the overall movement and decay of radionuclides in the repository and  
32 disposal system. NUTS uses the same geometry as BRAGFLO, the brine and gas flow fields  
33 calculated by BRAGFLO, and the radionuclide source concentrations (solubilities) in the  
34 repository defined by the actinide source term models. In simulations of the E1 scenario,  
35 NUTS also tracks brine originating in the Castile brine reservoir, including the fraction of  
36 Castile brine that has flowed out from the borehole and into the waste in the repository. See  
37 Appendix NUTS (Section 4) for additional information on the use of NUTS in performance  
38 assessment. PANEL calculates actinide source term to the Culebra for the E1E2 scenario, as  
39 discussed in Section 6.4.13.5. PANEL is described in detail in Appendix PANEL.

40  
41 In all scenarios, the quantity of brine flowing up the shafts or a degraded exploratory borehole  
42 to the Culebra is calculated by BRAGFLO, and the concentration of radionuclides in that  
43 brine, calculated by NUTS or PANEL, is used to determine the quantity of radionuclides  
44 released to the Culebra.  
45

1 CUTTINGS\_S and BRAGFLO\_DBR are used to evaluate the immediate consequences of  
2 inadvertent human intrusion through exploratory drilling. Solid material and brine may be  
3 transported to the surface in the drilling fluid. After pressure in the repository is relieved  
4 through the first borehole, subsequent boreholes may release less material to the surface.  
5 CUTTINGS\_S calculates the quantity of solid material transported to the accessible  
6 environment at the surface during the drilling activities. This material includes material  
7 removed directly from the borehole (cuttings), together with cavings and spillings. The code  
8 is discussed in Appendix CUTTINGS. BRAGFLO\_DBR is used to calculate the quantity of  
9 brine transported up the borehole to the surface.

10  
11 SECOFL2D and SECOTP2D together calculate the detailed movement of radionuclides in the  
12 Culebra that occurs if radionuclides are introduced by flow up the shafts or through a  
13 degraded exploratory borehole. SECOFL2D calculates regional Culebra flow fields using an  
14 assumption that flow occurs in a single-porosity medium. SECOFL2D uses the transmissivity  
15 fields calculated by GRASP-INV (one field in each simulation). SECOTP2D calculates  
16 radionuclide transport in a double-porosity medium, accounting for advection in fractures,  
17 matrix diffusion, retardation, and decay, as described in Section 6.4.6.2. SECOFL2D is  
18 discussed in Appendix SECOFL2D; SECOTP2D is discussed in Appendix SECOTP2D. The  
19 NUTS and PANEL codes calculate the actinide source term to the Culebra.

20  
21 The computer code CCDFGF is used to (1) determine random sequences of future events that  
22 may occur over the next 10,000 years at the WIPP site; (2) estimate the radionuclide releases  
23 resulting for these random sequences of future events, using the results of the calculations  
24 described thus far in Section 6.4; and (3) construct a CCDF for each realization. The manner  
25 in which CCDFGF determines random sequences of future events is the subject of Section  
26 6.4.12. The estimation of consequences and construction of a CCDF for these sequences of  
27 future events is the subject of Section 6.4.13.

#### 28 29 **6.4.12 Sequences of Future Events**

30  
31 For this application, sequences of future events that may occur are determined using a random  
32 sampling procedure described in Appendix CCDFGF (Section 3.2). A general description of  
33 the technique is presented in this section.

34  
35 The incorporation of stochastic uncertainty in the performance assessment is based on  
36 repeatedly generating independent sequences of events that may occur at the WIPP over the  
37 next 10,000 years. Each 10,000-year sequence is generated by randomly sampling six  
38 parameters that characterize stochastic uncertainty about future events repeatedly. These  
39 parameters include (1) the interval of time between drilling intrusions (which yields both the  
40 number and time of intrusions), (2) the location of each drilling intrusion, (3) the activity of  
41 the waste penetrated by each drilling intrusion, (4) the plug configuration in the intrusion  
42 borehole, (5) the penetration of a Castile brine reservoir, and (6) the occurrence of mining.  
43 Probability distribution functions are assigned to each of these six parameters and are  
44 discussed in the following sections. Random sampling from these distributions is used to  
45 generate 10,000 equally likely, independent futures for the WIPP for each realization

1 executed and CCDF constructed. The computer code CCDFGF (Appendix CCDFGF, Section  
2 3.2) is used to randomly sample sequences of future events, construct consequences of these  
3 sequences, and assemble CCDFs. As described in Section 6.4.13, normalized integrated  
4 radionuclide releases to the accessible environment are estimated for each history using the  
5 consequence modeling system.

6  
7 The probability assigned to the occurrence of certain events in the future at the WIPP site is  
8 affected by regulatory guidance and by actions taken by the DOE to deter activities  
9 detrimental to WIPP performance. Active and passive institutional controls are discussed  
10 extensively in Chapter 7.0. A summary of their use in performance assessment begins the  
11 discussion in this section.

#### 12 13 6.4.12.1 Active and Passive Institutional Controls in Performance Assessment

14  
15 Active institutional controls and passive institutional controls will be implemented at the  
16 WIPP site to deter human activity that may be detrimental to the performance of the  
17 repository. Active institutional controls and passive institutional controls are described in  
18 detail in Chapter 7.0 and in appendices referenced in Chapter 7.0. In this section, the impact  
19 of active institutional controls and passive institutional controls to performance assessment is  
20 described.

21  
22 Active institutional controls will be implemented at the WIPP after final facility closure to  
23 control access to the site and to ensure that activities detrimental to the performance of the  
24 disposal system do not occur within the controlled area. The active institutional controls will  
25 preclude human intrusion in the disposal system. A limitation for considering the  
26 effectiveness of active institutional controls in performance assessment is established in  
27 40 CFR Part 191. That limitation is 100 years. Because of the nature of the system of active  
28 institutional controls to be implemented and regulatory restrictions, it is assumed in  
29 performance assessment that there can be no inadvertent human intrusions or mining in the  
30 controlled area for 100 years following repository closure.

31  
32 Passive institutional controls have a function in deterring inadvertent human intrusion into the  
33 disposal system in performance assessment. While only minimal assumptions were made  
34 about future society for the purposes of designing the passive institutional controls to comply  
35 with the Assurance Requirements, more detailed assumptions are made in order to quantify  
36 the effectiveness of passive institutional controls for performance assessment. The preamble  
37 to 40 CFR Part 194 limits any credit for passive institutional controls in deterring human  
38 intrusion to 700 years after disposal (EPA 1996a, 61 FR 5231). This suggested time limit is  
39 important in quantifying the effectiveness of passive institutional controls for performance  
40 assessment purposes. Because active institutional controls are effective for the first 100  
41 years, passive institutional controls are effective for the period of time from 100 to 700 years,  
42 or a duration of 600 years.

43  
44 The effectiveness of passive institutional controls is implemented in performance assessment  
45 by reducing the rate of human intrusion and mining by a factor that estimates the

effectiveness of passive institutional controls. As discussed in Appendix EPIC, passive institutional controls are assumed to be 0.99 effective, meaning that the rate of deep drilling and mining for the 600-year duration of passive institutional controls is a factor of 0.01 times the respective rates for the uncontrolled period following 700 years. Because passive institutional controls are designed to protect the controlled area, this reduction factor is applied to the entire controlled area.

#### 6.4.12.2 Number and Time of Drilling Intrusions

The number of drilling intrusions associated with each 10,000-year history is based on 40 CFR § 194.33(b)(2) and § 194.33(b)(3):

In performance assessments, drilling shall be assumed to occur in the Delaware Basin at random intervals in time and space during the regulatory time frame. [40 CFR 194.33(b)(2)]

The frequency of deep drilling shall be calculated in the following manner:

- (i) Identify deep drilling that has occurred for each resource in the Delaware Basin over the past 100 years prior to the time at which a compliance application is prepared.
- (ii) The total rate of deep drilling shall be the sum of the rates of deep drilling for each resource. [40 CFR 194.33(b)(3)]

The DOE's implementation of these criteria is described in this and the following sections.

Mathematically, events that are random in time can be described as following a Poisson process that can be written in a simple form as

$$(13)$$

where  $p[E_n(\Delta t)]$  is the probability ( $p$ ) that some number ( $n$ , an integer) of events ( $E$ ) will occur in a time interval ( $\Delta t$ ) given a rate constant  $\lambda$  with units of events per time.

Inadvertent human intrusions may occur at any time between 100 years and 10,000 years after the decommissioning of the facility. Both the number and time of intrusions are determined sequentially by sampling from a CDF derived from the Poisson model that probabilistically describes the time period that elapses between an intrusion at a fixed time and the next intrusion. The time interval to the next intrusion following an intrusion may vary from 0 years to greater than 9,900 years, with a probability determined by the rate constant  $\lambda$ . The rate constant is derived from the drilling rate established for the Delaware Basin and the area of the waste disposal region, 0.049 square miles (0.126 square kilometers). The drilling rate used in this analysis was 46.8 boreholes per square kilometer per 10,000 years. As discussed in Appendix DEL (Section DEL.7.4), this rate is based on a review of past and present drilling activity in the Delaware Basin. The rate constant  $\lambda$  is assigned different values for three time periods. While active institutional controls are effective, it is equal to zero, and while passive institutional controls are effective, it is two orders of magnitude lower than during the uncontrolled period (700 to 10,000 years).

1 The CDF for intrusion times while passive institutional controls are effective is called the  
2 passive institutional controls CDF. The CDF for intrusion times after passive institutional  
3 controls may no longer be considered effective is called the post-passive institutional controls  
4 CDF. Sequences of future deep drilling events are constructed as follows. The passive  
5 institutional controls CDF is sampled to determine whether an intrusion occurs while passive  
6 institutional controls are effective. If the sampled time is greater than 600 years, zero  
7 intrusions occur before 700 years. If the time is less than 600 years, the passive institutional  
8 controls CDF is sampled again to determine whether a second intrusion occurs in the interval  
9 between the time of the first intrusion and 700 years. This procedure continues until a time of  
10 intrusion greater than 700 years is determined.

11  
12 Intrusions times after 700 years are determined by sampling the post-passive institutional  
13 controls CDF. If the sampled time is greater than 9300 years ( $700 + 9,300 = 10,000$ ), no  
14 intrusions occur between 700 and 10,000 years. If the sampled time is less than 9,300 years,  
15 an intrusion occurs at 700 years plus the sampled time. The post-passive institutional controls  
16 CDF is sampled iteratively to determine whether intrusions occur in the time interval between  
17 the last intrusion and 10,000 years, until an intrusion is determined to occur after 10,000  
18 years.

19  
20 Evaluation of the Poisson process for a specified rate constant and time interval yields the  
21 probability of occurrence of specified numbers of intrusions. Using a different rate constant  
22 for 100 years of active institutional controls, 600 years of passive institutional controls, and  
23 9300 years of uncontrolled activity, the most likely number of intrusions into the waste  
24 disposal region during 10,000 years is five, occurring with a probability of 0.1715. Zero  
25 intrusions occur with a probability of 0.0041. The largest number of intrusions that occur with  
26 a probability greater than  $10^{-3}$  per 10,000 years (and which therefore can contribute to  
27 releases for comparison with the quantitative release limits) is 14, occurring with a probability  
28 of 0.0011. Probabilities for other numbers of intrusions within 10,000 years are given in  
29 Table 6-28. These probabilities are shown as a histogram in Figure 6-27.

### 30 31 6.4.12.3 Location of Intrusion Boreholes

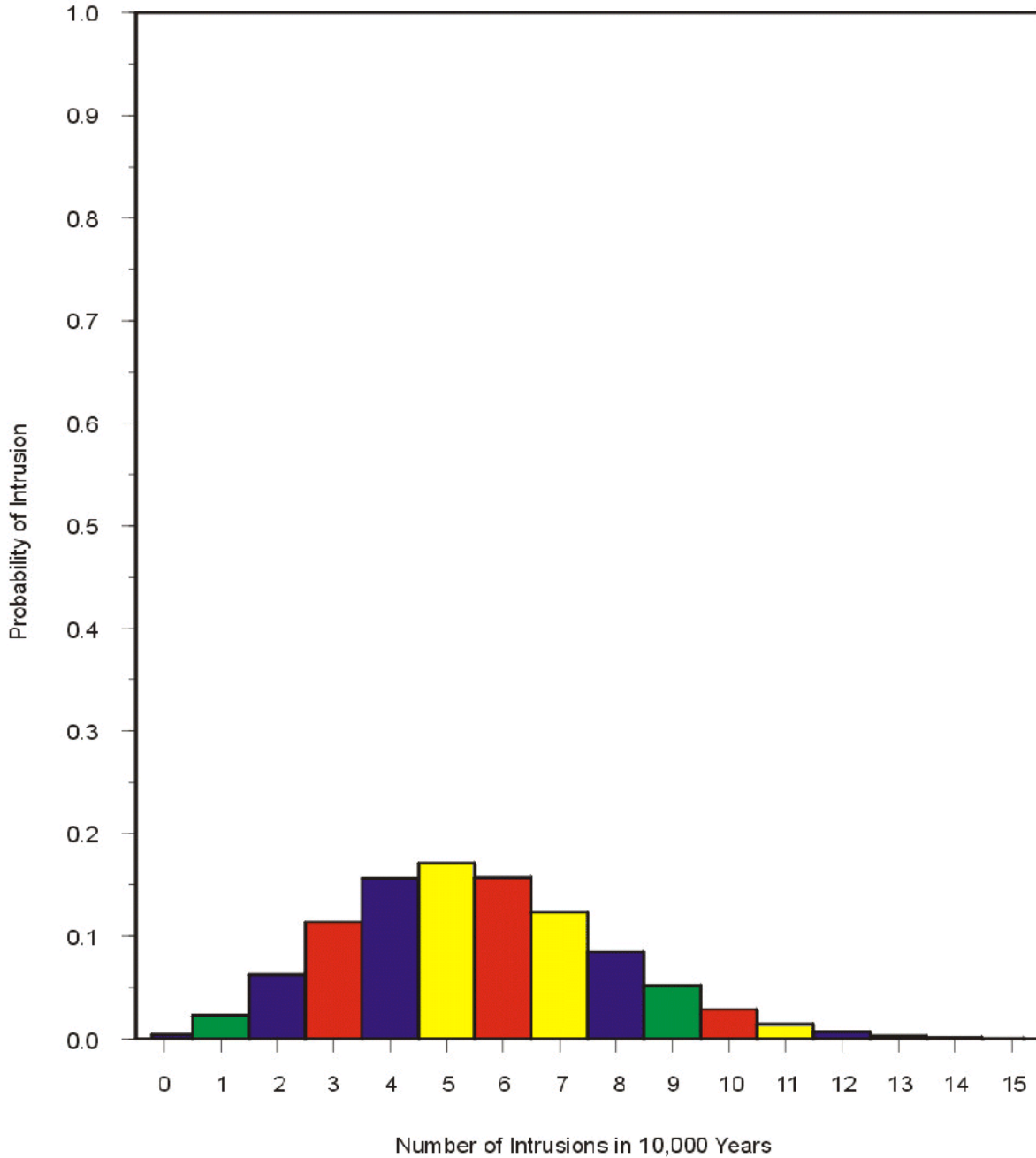
32  
33 Drilling events are assumed to be random in time and space, and the location of each intrusion  
34 borehole within the waste disposal region is sampled randomly. This is done in the analysis by  
35 discretizing a plan view of the area within the passive institutional control berms (see  
36 Appendix PIC, Section VIII) into 144 separate regions, and requiring each intruding borehole  
37 to penetrate one, and only one, region (Figure 6-28). The probability of intersecting each  
38 location is equal to  $1/144$  (about 0.00694), and slight variations in the size of regions are  
39 disregarded as unimportant.

**Table 6-28. Probabilities of Different Numbers of Intrusions into the Waste Disposal Region (for 100 years of active institutional control, 600 years of passive institutional control, and 9,300 years of uncontrolled activity)**

Number of Intrusions	Probability of Occurrence
0	0.0041
1	0.0227
2	0.0622
3	0.1138
4	0.1562
5	0.1715
6	0.1570
7	0.1231
8	0.0845
9	0.0516
10	0.0283
11	0.0141
12	0.0065
13	0.0027
14	0.0011
15	0.0004

Each of the 144 regions contains both excavated and unexcavated areas at the repository horizon. A borehole penetration of a region has an approximately 20 percent chance of intruding excavations and approximately 80 percent chance of passing through unexcavated Salado. The berm area and the proportion of excavated to unexcavated regions at the repository horizon are important in the Castile brine reservoir model, as discussed in 6.4.12.6.

Boreholes that penetrate excavations may penetrate CH-TRU waste, RH-TRU waste, or panel closures that contain no waste. For long-term releases and direct brine releases, all penetrations into excavations are treated as if CH-TRU waste is penetrated, and the RH-TRU waste inventory is averaged into the CH-TRU waste inventory for source-term determination. For cuttings and cavings direct releases, there is an approximately 12 percent chance that RH-TRU waste canisters are penetrated and an 88 percent chance that CH-TRU waste is penetrated, corresponding to the relative plan-view areas of each waste type. For cuttings and cavings direct releases, the small area of the panel closures is treated as CH-TRU waste and is included in the CH-TRU waste probability. Because of the low permeability of the region surrounding each RH-TRU waste canister, intrusions into RH-TRU waste are assumed to not produce spillings releases. Intrusions resulting in spillings releases are treated as CH-TRU waste for the source term determination.



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**Figure 6-27. Probability of Intrusions in 10,000 Years with Active Institutional Control for 100 Years Followed by 600 Years of Passive Institutional Control**



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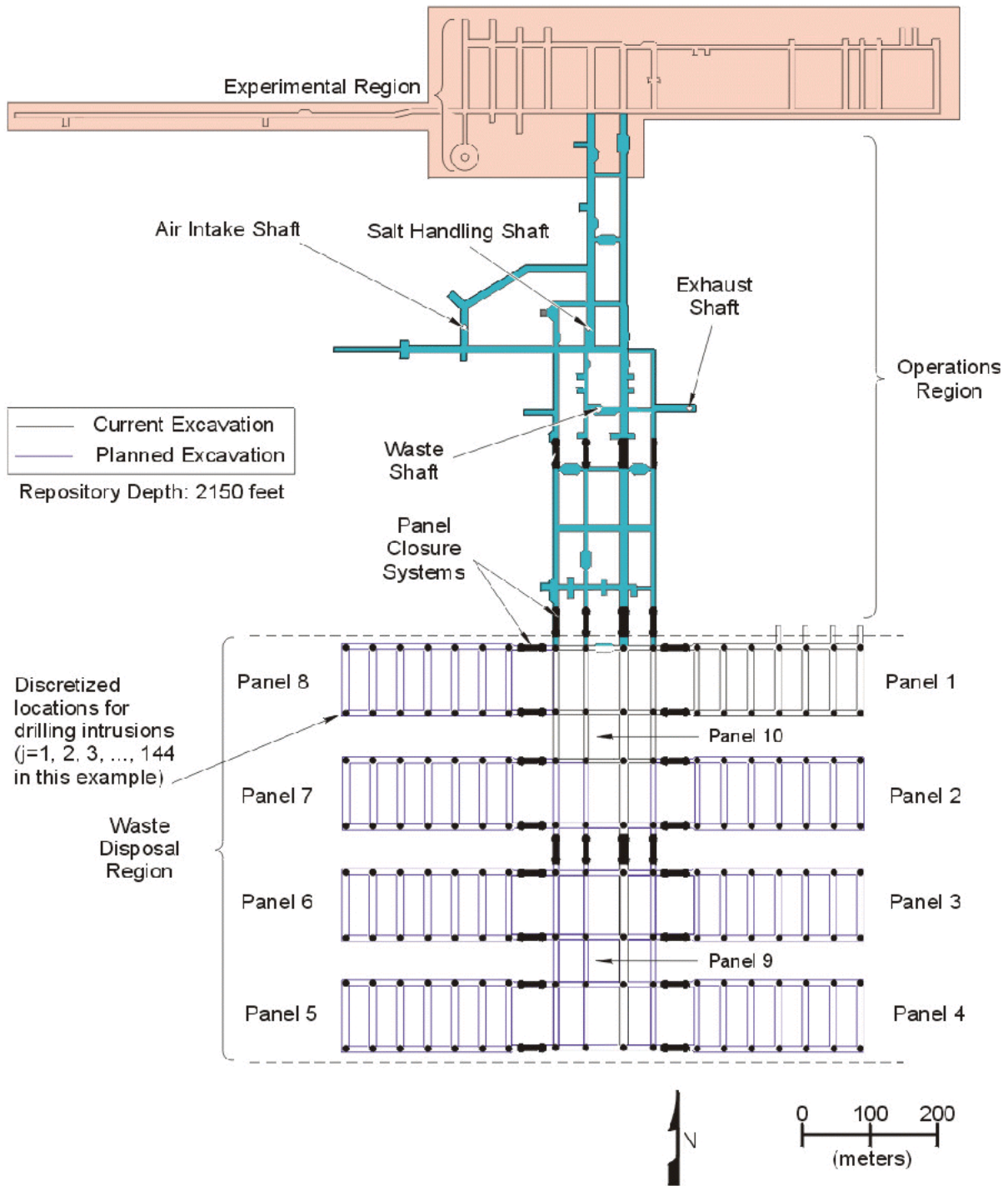


Figure 6-28. Discretized Locations for Random Intrusion by an Exploratory Borehole

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1 6.4.12.4 Activity of the Intersected Waste

2  
3 Containers of waste shipped to the WIPP will contain quantities of radionuclides that will  
4 vary from container to container. Radioactivity may vary by several orders of magnitude  
5 from those waste containers with the largest quantities of radionuclides to those with the  
6 smallest.

7  
8 Information about waste radioactivity has been compiled at several different levels  
9 (Figure 6-29). The waste-stream level includes information about waste activities from  
10 different processes at the generator sites that create TRU waste. At this level, a separate  
11 waste stream characteristic is maintained for RH-TRU. In total, there are approximately 970  
12 CH- and RH-TRU waste streams, of which 569 are CH-TRU. Because the RH-TRU is  
13 approximately 1 percent (actually 1.5 percent) of the total EPA units (not activity) of CH-  
14 TRU waste, all the RH-TRU waste was grouped (binned) together into one equivalent or  
15 average (WIPP-scale) RH-TRU waste stream. It is assumed that variability in this small  
16 fraction is negligible. The waste-generator site level includes information integrated over the  
17 scale of a generator site. There are 21 generator sites identified for the WIPP. The WIPP-  
18 scale level includes integrated information about all waste destined for the WIPP, including  
19 CH- and RH-TRU. Data are present for existing waste and estimates have been made for  
20 future (to-be-generated) waste. The integration of waste data with the performance  
21 assessment is illustrated in Figure 6-30. This information is compiled for the WIPP from the  
22 Transuranic Waste Baseline Inventory Database (TWBID), an electronic version of  
23 information present in the Transuranic Waste Baseline Inventory Report (TWBIR), Rev. 3.  
24 (see Appendix BIR).

25  
26 For calculation of radionuclide releases from groundwater transport (including direct brine  
27 release) and from spallings, spatial variability in the activity in the waste is assumed to have  
28 no significant impact. Concentrations of radionuclides mobilized in repository brine and  
29 quantities transported to the ground surface in spallings are assumed to be derived from a  
30 sufficiently large volume of waste that container-scale variability can be neglected. For long-  
31 term releases and direct brine releases, releases are calculated using WIPP-scale data  
32 assuming homogeneous accessibility of RH- and CH-TRU waste activities by liquid in the  
33 repository. As discussed previously, spallings releases are not calculated for RH-TRU waste;  
34 consequently, for spallings releases, activities are determined assuming homogeneous  
35 accessibility for only CH-TRU waste.

36  
37 Direct releases caused by the mechanisms of cuttings and cavings access discrete and  
38 relatively small portions of the waste, and estimates of the quantity of radioactivity released to  
39 the accessible environment from these mechanisms may be sensitive to variability in activity  
40 loading. The radioactivity of cuttings and cavings releases is calculated using data from the  
41 waste-stream level in the following manner.

42  
43 Containers are assumed to be placed in the WIPP from the various waste streams in a random  
44 manner. Because waste containers are to be stacked three-high for disposal, a drill bit is  
45 assumed to penetrate three containers. The direct-release consequence resulting from a drill

1 bit hitting the edges of containers and generating releases from more than three containers is  
2 assumed to be similar to the consequence of penetrating three containers only. Each of the  
3 three containers penetrated by the drill bit can come from different waste streams and have  
4 different activities associated with them. The waste streams penetrated are randomly sampled  
5 according to the relative quantity of waste in each waste stream. Figure 6-31 shows the  
6 discretized activities, expressed as the EPA normalized release density, of the 569 CH-TRU  
7 waste streams as a CDF, and the decay of the waste stream activities through time. Waste  
8 stream activities are maintained in performance assessment at 100, 125, 175, 350, 1,000,  
9 3,000, 5,000, 7,500, and 10,000 years. Activities for cuttings and cavings releases at other  
10 times are interpolated from these values.

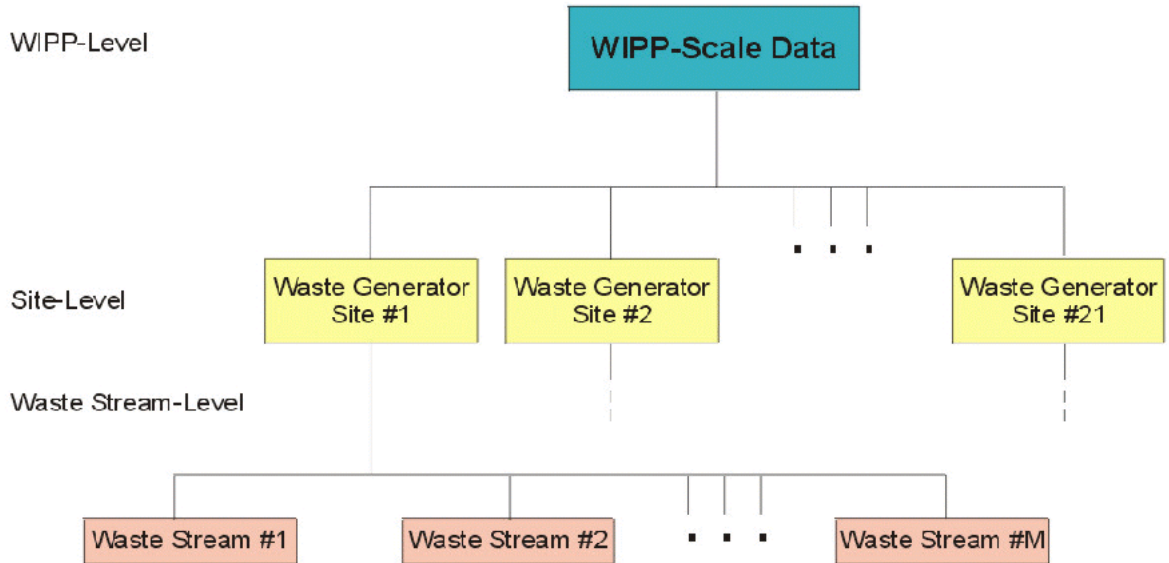
11  
12 The code CUTTINGS\_S calculates the volume of repository material brought to the surface  
13 by the mechanisms of cuttings and cavings. Of the volume of repository removed,  
14 approximately 40 percent is waste material, the rest is void space, backfill, and drum packing  
15 material. It is assumed that one-third of the waste material released comes from each of three  
16 containers assumed to be intersected. The activity of the release to the surface during drilling  
17 by cuttings and cavings is determined as the sum of the products of one-third the release  
18 volume times the three waste stream activities randomly sampled to be intersected. If random  
19 sampling determines that the borehole penetrates RH-TRU waste, 100 percent of the material  
20 removed is assumed to be waste and the activity of the release is equal to the volume  
21 calculated by CUTTINGS\_S times the activity of RH-TRU waste.

#### 22 23 6.4.12.5 Diameter of the Intrusion Borehole

24  
25 Historical Delaware Basin drilling records were reviewed to determine the diameter of a  
26 typical intrusion borehole. In performance assessment, the borehole diameter parameter value  
27 is held constant for all future drilling and is equal to 12.25 inches (0.311 meter). Appendix  
28 DEL (DEL Attachment 1) discusses typical drill stem and drill collar diameters used to drill oil  
29 and gas wells in the Delaware Basin. Appendix DEL (Section DEL.6.1.2.2) illustrates a  
30 generalized circular cross section of a well plugged according to current practice (see  
31 Appendix DEL, DEL Attachment 7).

#### 32 33 6.4.12.6 Probability of Intersecting a Brine Reservoir

34  
35 As mentioned in Section 6.4.8, there is uncertainty about the existence of brine reservoirs and  
36 uncertainty in the probability of intersecting a brine reservoir with a deep borehole. The DOE  
37 has examined available data and concluded that there is no reasonable basis to eliminate the  
38 possibility of a brine reservoir existing under the site. Therefore, the DOE assumes that a  
39 brine reservoir may exist under the waste panels. The DOE has determined that there is a  
40 reasonable basis for determining the probability of intersecting a brine reservoir and has  
41 pursued three types of investigation relevant to this issue: geophysical methods, geological  
42 structure analysis, and geostatistical correlation.



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Figure 6-29. Levels of Information Available in the TWBID

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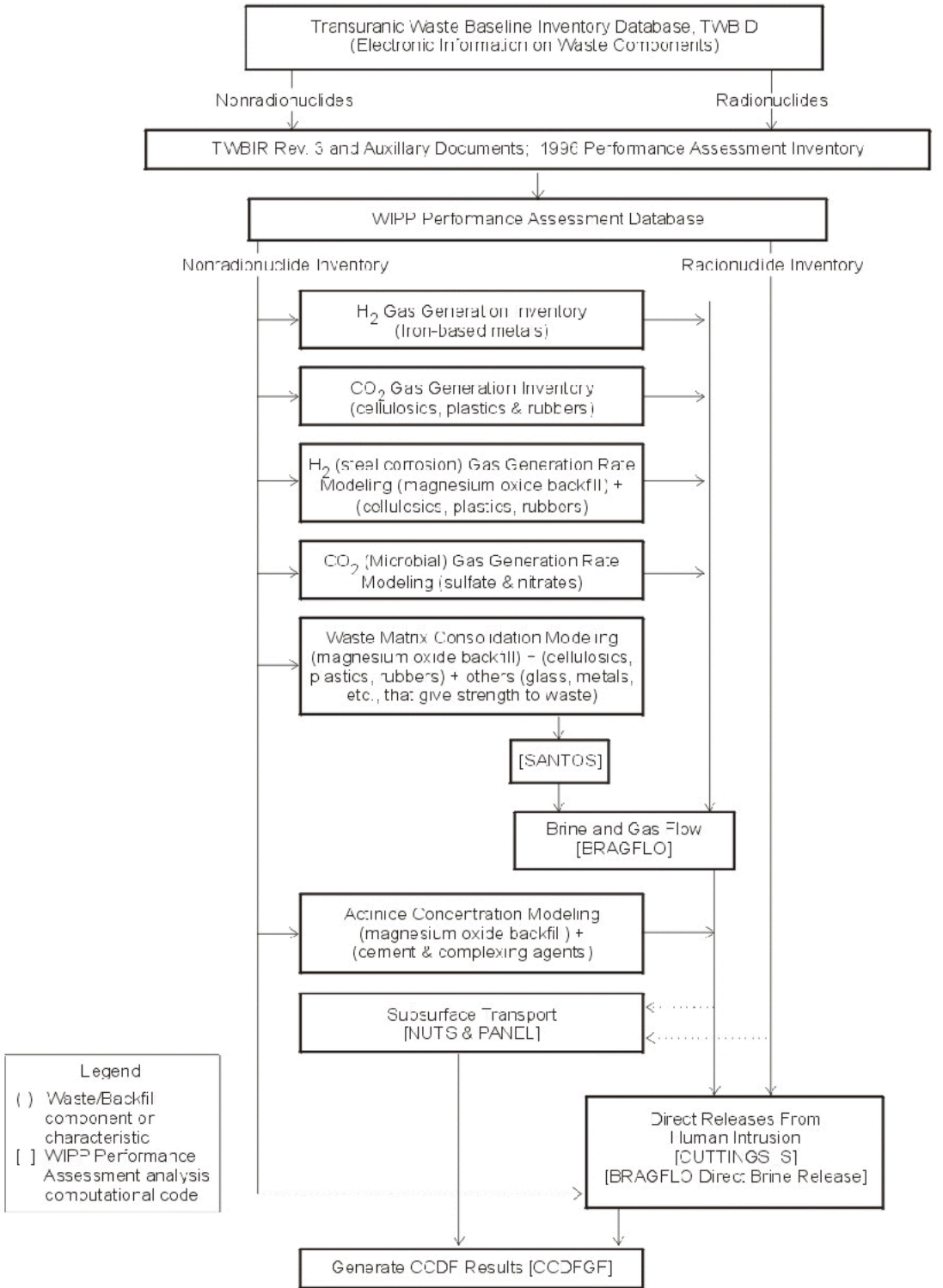


Figure 6-30. Flowchart Showing Integration of TWBID Data in Performance Assessment Calculations

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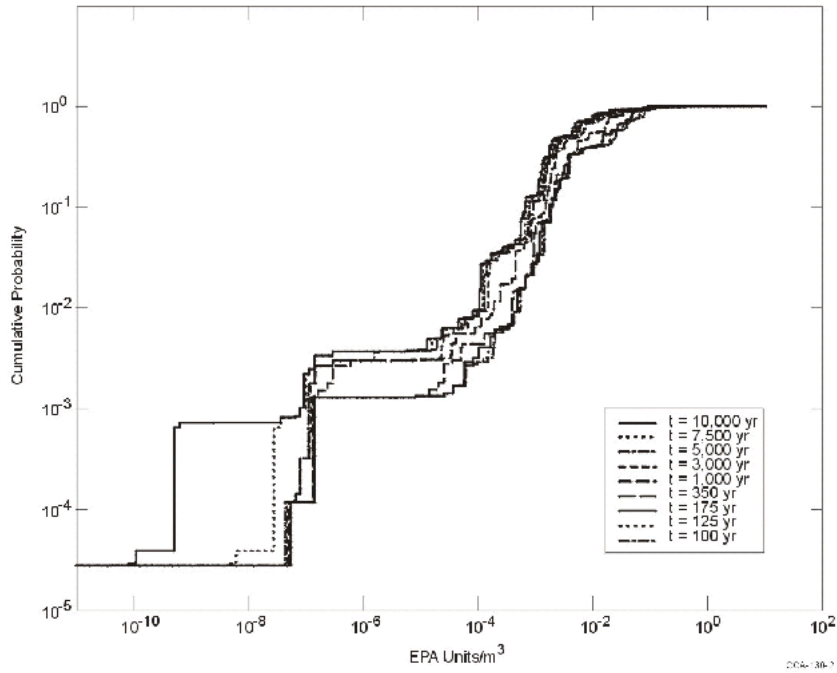


Figure 6-31. Cumulative Distribution Function for Waste Stream EPA Units/Volume

1 **Figure 6-31. Cumulative Distribution Function for Waste Stream EPA Units/Volume**

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1 In 1987, the DOE conducted a series of 38 time-domain electromagnetic (TDEM) soundings  
2 at the WIPP site (Earth Technology Corporation 1988; Appendix MASS, Section MASS.18.1  
3 and MASS Attachment 18-5). Thirty-six of these soundings were executed over a 1-by-2-  
4 kilometer area, with the north-central nine soundings located directly over the waste panels.  
5 The electromagnetic data collected by the measurements indicate differences in electrical  
6 resistivity, which can be interpreted as occurring in the Castile. Regions of relatively low  
7 resistivity in the Castile are presumed to be so because of a greater abundance of  
8 interconnected brine compared to higher-resistivity regions. A sounding executed near the  
9 brine reservoir penetrated at WIPP-12 provides an independent calibration on the  
10 interpretation of the data. The study indicates the presence of electrically conductive regions  
11 below the waste panels at the WIPP. However, because of the inherent coarse resolution of  
12 the method, the data do not support the development of a unique map of the extent of  
13 conductors in the Castile. A recent interpretation of the data included in Appendix MASS  
14 (Section MASS.18.1 and MASS Attachment 18-5) suggests that between 10 percent and  
15 55 percent of the waste panel area may be underlain by relatively conductive units,  
16 interpreted to be one or several brine reservoirs. The TDEM data do support a limited  
17 probability of intersecting brine. Because of the spatial resolution provided by TDEM data,  
18 however, the data do not support distinguishing boundaries between reservoir and  
19 nonreservoir areas. Thus, the DOE assumes that one reservoir exists below the waste panels.  
20

21 The geological structure of selected units within the Castile and Salado has been mapped  
22 recently to examine more closely the relationship between identified brine intercepts and  
23 evaporite deformation. This study is described in Appendix MASS (Section MASS.18.1 and  
24 MASS Attachment 18-6). After ERDA-6 encountered brine in steeply dipping beds, studies  
25 indicated that many of the other observed brine encounters in the Delaware Basin are  
26 associated with structural deformation in the Castile. The study of structure reaffirms the  
27 concept that much of the Castile underlying the present WIPP site is generally undeformed.  
28 The DOE does not use the results of the structural study in quantifying the existence or  
29 probability of intersecting a brine reservoir.  
30

31 The geostatistical study discussed in Appendix MASS (Section MASS.18 and included as  
32 MASS Attachment 18-6), was conducted using existing borehole data to estimate the  
33 probability of drilling into a fractured reservoir in areas overlain by WIPP underground  
34 workings. The database consists of boreholes in the general area of the WIPP where Castile  
35 brine has been encountered as well as a much larger number of boreholes in which brine is not  
36 reported to have been encountered. The study used geostatistical methods to estimate the  
37 probabilities that a randomly placed borehole would encounter pressurized brine in the  
38 Castile. These methods do not require assumptions about the distribution of brine reservoirs  
39 but are based on the empirical evidence available. Based on geostatistical analysis, the DOE  
40 uses a 0.08 probability that any deep borehole drilled within the waste panel penetrates the  
41 brine reservoir that is assumed to exist below the waste panels.  
42

43 The DOE assumes that there is one reservoir under the quadrilateral area enclosing the waste  
44 panels with a constant probability of any deep borehole penetrating it. The location of  
45 boreholes in this area is sampled. They may lie over repository excavations, or over rock in

1 pillar cores or between panels. The brine reservoir under the waste panels can be depleted  
2 during the 10,000-year regulatory period by boreholes drilled anywhere within this area.  
3 Boreholes that are randomly located over rock have the same probability of intersecting the  
4 brine reservoir as boreholes located over excavations. Boreholes located over the excavations  
5 are assumed to penetrate waste, and the consequences are modeled as described throughout  
6 Section 6.4. Boreholes located over the intact rock in this area are assumed to have no  
7 consequences on the disposal system other than that they can contribute to the depletion of  
8 reservoirs, as discussed below.

9  
10 Long-term depletion of pressure and the production of brine from a reservoir that may exist  
11 under the repository occurs only for the two-plug configuration boreholes. Long-term  
12 depletion does not occur during the 10,000-year regulatory period for the solid-concrete plug  
13 boreholes or three-plug configuration borehole.

14  
15 BRAGFLO calculates the long-term depletion of pressure and production of brine from the  
16 reservoir for only one two-plug configuration borehole. For estimating the consequences of  
17 possible sequences of future events, the DOE assumes how the reservoir responds to  
18 additional penetrations. Subsequent penetrations are assumed to behave identically to the first  
19 until the reservoir is assumed to be completely depleted and cannot produce more brine (see  
20 Appendix MASS, Section MASS.18 and MASS Attachment 18-3). The DOE assumes the  
21 32,000-cubic-meter reservoir is depleted after two penetrations; the 64,000-cubic-meter  
22 reservoir after four penetrations; the 96,000-cubic-meter reservoir after six penetrations; the  
23 128,000-cubic-meter reservoir after eight penetrations; and the 160,000-cubic-meter reservoir  
24 after 10 penetrations. Because it is assumed for modeling simplicity that penetrations before  
25 depletion behave identically to the first penetration, it is possible for a reservoir to  
26 cumulatively produce more brine with multiple intrusions than it is assumed to contain for the  
27 first intrusion.

#### 28 29 6.4.12.7 Plug Configuration in the Abandoned Intrusion Borehole

30  
31 As stated in Section 6.4.7, three different plug configurations can be used to represent possible  
32 future configurations of plugged and abandoned intrusion boreholes. Based on a survey of  
33 current practice (see Appendix MASS, Section MASS.16.3 and MASS Attachment 16-1), the  
34 two-plug configuration borehole is considered most likely and is assigned a probability of  
35 0.68. The three-plug configuration is considered less likely and is assigned a probability of  
36 0.30. The continuous concrete plug is considered least likely and is assigned a probability of  
37 0.02.

#### 38 39 6.4.12.8 Probability of Mining Occurring within the Land Withdrawal Area

40  
41 The EPA has specified the probability of mining in the future. In 40 CFR § 194.32 (b), the  
42 EPA states, "Mining shall be assumed to occur with a one in 100 probability in each century  
43 of the regulatory time frame."  
44

1 Also in 40 CFR § 194.32(b), the EPA limits the occurrence of mining to a maximum of once  
2 per 10,000 years. The DOE has interpreted this probability model as a Poisson model with a  
3 probability of mining of  $10^{-4}$  per year (Appendix CCDFGF, Section 3). During the period  
4 that passive institutional controls are effective, the probability of mining is  $10^{-6}$  per year. The  
5 occurrence of mining is sampled from a CDF of the time until mining in a manner similar to  
6 the procedure described for the time between drilling intrusions, except that multiple mining  
7 events cannot occur.

### 8 9 **6.4.13 Construction of a Single CCDF**

10  
11 Construction of a single CCDF requires combining the results of numerical simulations  
12 performed for a given set of values of subjective parameters (that is, those determined by  
13 LHS) with the probabilistic futures determined by random sampling of stochastic parameters  
14 (that is, those associated with intermittent drilling) (see Appendix CCDFGF, Section 2).  
15 Because of the variety of sequences of events represented in a single CCDF and the  
16 impossibility of modeling the details of each future separately, building a CCDF necessarily  
17 involves methods for the construction of consequences for any probabilistic future from a  
18 limited number of calculations for deterministic, idealized futures. Although this methodology  
19 is conceptually straightforward, the details of the process are highly dependent on model and  
20 system-specific considerations (see Appendix CCDFGF, Section 4). Accordingly, insight  
21 gained from previous, preliminary performance assessments as well as analysis of early results  
22 for this performance assessment are used to help configure the methodology used for CCDF  
23 construction.

24  
25 Depending on the scenario into which probabilistic futures are classified, different techniques  
26 are used for estimating their consequences. The deterministically determined undisturbed  
27 performance scenario consequences require no special techniques for application to  
28 probabilistic futures. For E1, E2, and E1E2 scenarios, the CCDF construction methodology is  
29 primarily based on the principle of scaling, with some simplifying assumptions made for the  
30 E2 scenario. Scaling is the estimation of consequences of probabilistic futures based on  
31 consequence estimates from deterministic futures. The use of scaling and the building of a  
32 CCDF with it is discussed in this section. Note that all of the discussions in Section 6.4.13 are  
33 for one vector of values for those parameters included in the subjective uncertainty analysis.  
34 In other words, this section addresses only stochastic variation resulting from uncertainty in  
35 the sequence of future events that may occur at the WIPP (see Section 6.1.2).

#### 36 37 **6.4.13.1 Constructing Consequences of the Undisturbed Performance Scenario**

38  
39 All probabilistic futures in which drilling intrusion and mining within the controlled area do  
40 not occur are included in the undisturbed performance scenario. Because there is no  
41 stochastic uncertainty for this scenario, all futures within a single LHS vector of undisturbed  
42 performance have the same releases to the accessible environment. The following major  
43 codes are used to estimate the consequences of undisturbed performance: BRAGFLO, NUTS,  
44 and, if actinides reach the Culebra, SECOFL2D and SECOTP2D. To illustrate the flow of  
45 information for the undisturbed performance scenario, these codes and the connections

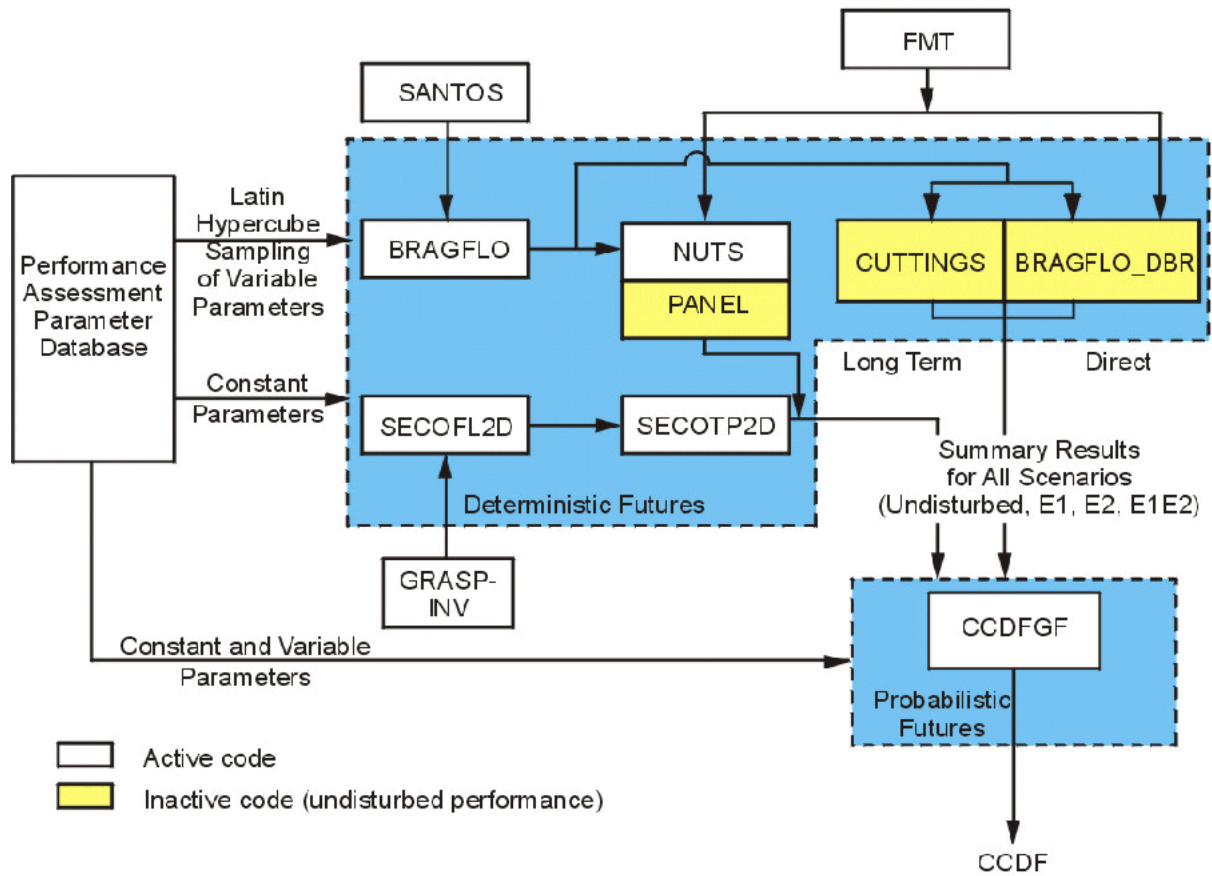
1 between them are highlighted on the diagram of performance assessment codes in Figure 6-32.  
2 For undisturbed performance, no special techniques are required to modify the results of the  
3 deterministic calculation to fit probabilistic futures. Therefore, for a single consequence for  
4 undisturbed performance, BRAGFLO is executed once and NUTS is executed once. These  
5 calculations determine the release to the accessible environment because of transport in the  
6 Salado or up the shaft to the surface. If any actinides reach the Culebra following these  
7 calculations, SECOFL2D and SECOTP2D are executed to determine whether actinides  
8 released to the Culebra reach the lateral accessible environment. This information is  
9 sufficient to construct consequences for all probabilistic futures that have no intrusion events.  
10 This information is also used as the basis for evaluations of compliance with 40 CFR § 191.15  
11 and 40 CFR § 191.24, described in Chapter 8.0.  
12

#### 13 6.4.13.2 Scaling Methodology for Disturbed Performance Scenarios

14  
15 Although 10,000 probabilistic futures are generated for the construction of a CCDF, the major  
16 codes used in performance assessment are executed many fewer times. The results of the  
17 fewer calculations are used in part to construct the consequences of all of the probabilistic  
18 futures comprising a CCDF in a process called scaling.  
19

20 The scaling methodology is simple in concept. First, several simulations are performed with a  
21 code to develop a reference behavior for a particular event or process. Each simulation has a  
22 defined event occurring at a different time. Then, a large set of futures is developed  
23 probabilistically by random sampling. The behavior of the particular event or process in each  
24 of the probabilistically sampled futures is estimated by scaling from the results of the limited  
25 number of deterministic calculations. This scaling is generally simple linear interpolation. For  
26 events or processes involving radionuclides, however, scaling becomes more complicated as it  
27 incorporates the effects of radioactive decay and ingrowth. Because scaling is generally less  
28 intensive computationally than is solving matrix equations of the type encountered in many  
29 performance assessment codes, scaling is an efficient way to develop multiple probabilistic  
30 consequence estimates from a limited number of deterministic calculations. Without scaling,  
31 fewer futures would be possible, and resolution in the CCDF would be reduced.  
32

33 For an example of the application of scaling, assume that the process of interest is release of  
34 actinides to the surface during drilling. It is impossible to explicitly model the infinite  
35 possibilities present in a probabilistic conceptualization of the future. Thus, scaling is used.  
36 To develop a reference behavior for scaling, the CUTTINGS\_S code is executed several times  
37 with different intrusion times. A probabilistic method is then used to develop a large number  
38 of possible, different future intrusion times. To estimate the release to the surface in  
39 probabilistic futures, scaling is used in which release at the times in the deterministic  
40 calculations closest to the probabilistic time of interest are used as reference points for scaling  
41 or interpolation.



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Figure 6-32. Code Configuration for the Undisturbed Performance Scenario



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1 Scaling is used for all futures with intrusion boreholes. The times when various codes are  
2 executed to develop reference behavior, and how this reference behavior is used by other  
3 codes, is the subject of the next two sections. In presenting complete descriptions of the  
4 process for each scenario, there will be some duplication of discussion.  
5

#### 6 6.4.13.3 Estimating Long-Term Releases from the E1 Scenario

7  
8 The E1 scenario is defined as a single penetration of a panel by a borehole that also intersects  
9 a brine reservoir. The code configuration with which the long-term consequences of E1  
10 scenarios are estimated is illustrated in Figure 6-33. For the E1 scenario, BRAGFLO is  
11 executed twice more for each CCDF (assuming the undisturbed performance run has already  
12 been executed), with the E1-type intrusion occurring at 350 years and 1,000 years. These  
13 three BRAGFLO calculations form the foundation for transport modeling that is used for  
14 scaling consequences to probabilistic futures.  
15

16 Consistent with the BRAGFLO intrusion times, NUTS is executed with intrusions occurring at  
17 350 and 1,000 years. These calculations form the basis for (1) estimating releases to the  
18 accessible environment via Salado interbeds or to the surface and (2) forming the actinide  
19 source term to the SECOTP2D code for Culebra transport. For computational efficiency, an  
20 intermediate scaling step is conducted prior to calculating the releases associated with  
21 probabilistic futures. In this intermediate step, NUTS reference conditions for Culebra  
22 releases by an intrusion at 100 years are calculated by using borehole flow from the 350-year  
23 intrusion, and NUTS reference conditions for intrusions at 3,000, 5,000, 7,000, and 9,000  
24 years are calculated by using borehole flow from the 1,000-year calculation. Thus, for the  
25 scaling of consequences of E1 intrusions in probabilistic futures, reference conditions  
26 calculated by NUTS are available for 100, 350, 1,000, 3,000, 5,000, 7,000, and 9,000 years  
27 postclosure.  
28

29 Consistent with the BRAGFLO intrusion times, reference behavior for actinide transport in  
30 the Culebra is calculated by SECOTP2D for the E1 intrusion occurring at 350 and 1,000  
31 years. Because the equations governing actinide transport and retardation in SECOTP2D are  
32 linear, scaling releases to probabilistic E1 penetrations occurring at other times is easily  
33 accomplished.  
34

#### 35 6.4.13.4 Estimating Long-Term Releases from the E2 Scenario

36  
37 The E2 scenario includes all futures with one or more exploratory borehole penetrations of a  
38 panel, none of which hits a brine reservoir. Estimation of long-term releases from the E2  
39 scenario is slightly more complex than the consequences of the E1 scenario because the E2  
40 scenario includes the possibility of multiple E2-type intrusions. The same codes used in the  
41 construction of the E1 scenario consequences are used for construction of the E2 scenario  
42 consequences. These are indicated in Figure 6-33.  
43

44 As is done for the E1 scenario, BRAGFLO is executed twice more for each CCDF (assuming  
45 the undisturbed performance run has already been executed), with the E2-type intrusion

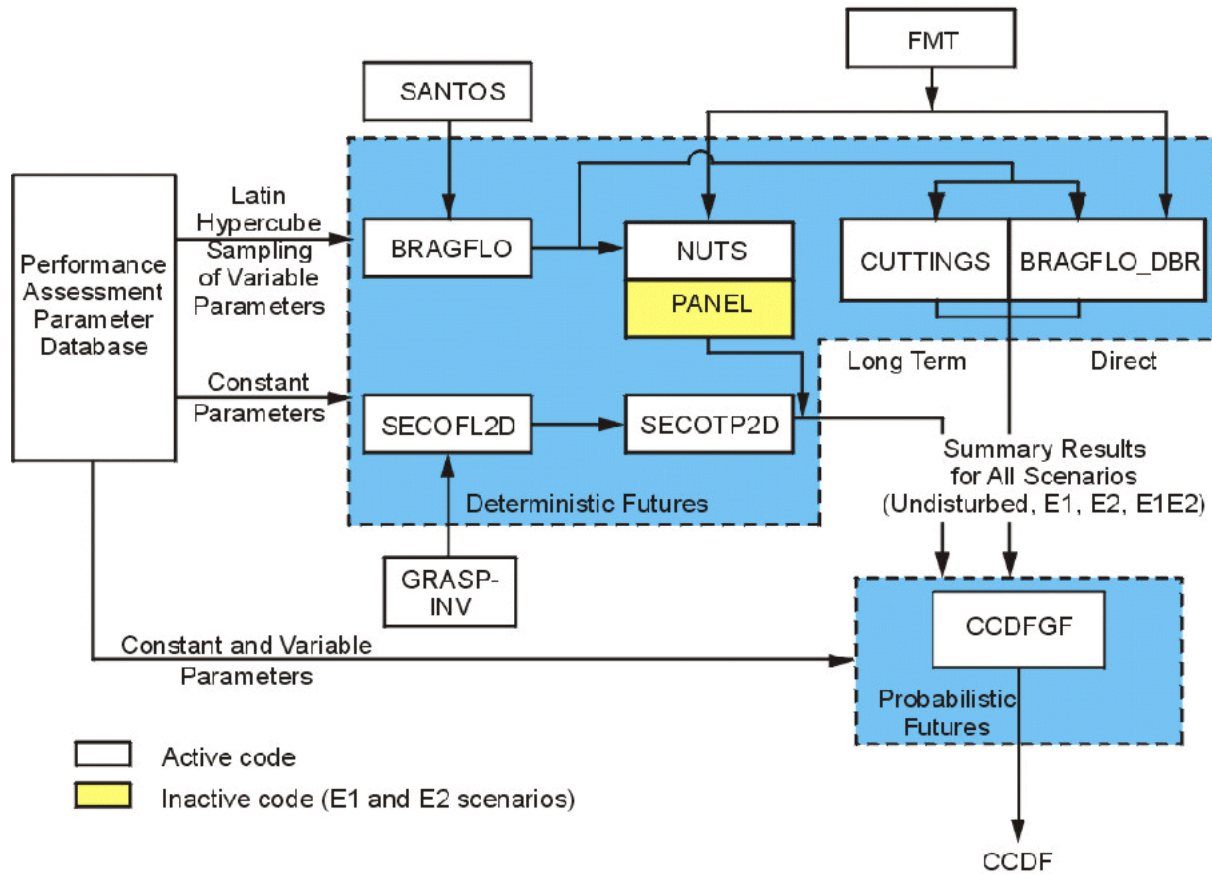
1 occurring at 350 years and 1,000 years. These three BRAGFLO calculations form the  
2 foundation for transport modeling that is used for scaling consequences to probabilistic  
3 futures.

4  
5 NUTS is executed with intrusions occurring at 350 and 1,000 years, consistent with the  
6 BRAGFLO times of intrusion. These calculations form the basis for (1) estimating releases to  
7 the accessible environment via Salado interbeds or to the surface and (2) forming the actinide  
8 source term to the SECOTP2D code for Culebra transport. For computational efficiency, an  
9 intermediate scaling step is conducted prior to calculating the releases associated with  
10 probabilistic futures. In this intermediate step, NUTS reference conditions for Culebra release  
11 by an intrusion at 100 years is estimated by scaling borehole flow from the 350-year intrusion,  
12 and NUTS reference conditions for intrusions at 3,000, 5,000, 7,000, and 9,000 years are  
13 estimated by scaling from the 1,000-year calculation. Thus, for the scaling of consequences  
14 of E2 intrusions in probabilistic futures, reference conditions from calculations by NUTS are  
15 available for 100, 350, 1,000, 3,000, 5,000, 7,000, and 9,000 years.

16  
17 Consistent with the BRAGFLO intrusion times, reference behavior for actinide transport in  
18 the Culebra is calculated by SECOTP2D for the E2 intrusion occurring at 350 and 1,000  
19 years. Because the equations governing actinide transport and retardation in SECOTP2D are  
20 linear, scaling releases to probabilistic E2 penetrations occurring at other times is easily  
21 accomplished. For futures with two or more E2-type intrusions (and no E1-type intrusions), a  
22 simplifying assumption is made. The additional increment to the source term to the Culebra  
23 for the second and subsequent intrusions is assumed to be zero. This is considered reasonable  
24 because in the E2 scenario the flux of brine to the Culebra is limited by the rate of flow from  
25 the Salado to the waste panels rather than by borehole properties. For second and subsequent  
26 E2 scenarios, only the direct releases to the surface are therefore considered in CCDF  
27 construction.

#### 28 29 6.4.13.5 Estimating Long-Term Releases from the E1E2 Scenario

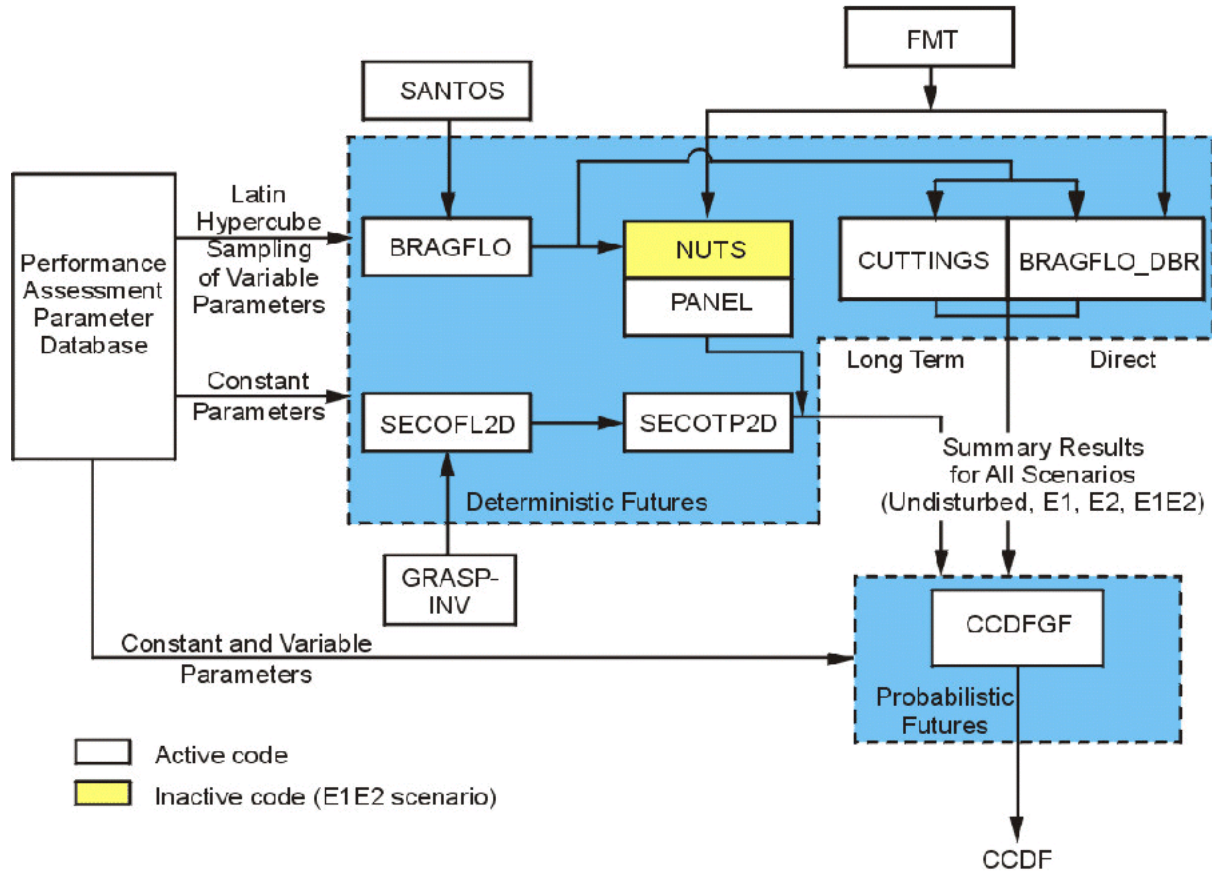
30  
31 The E1E2 scenario is defined as multiple boreholes intersecting a single waste panel, at least  
32 one of which is an E1 penetration of a brine reservoir (Section 6.3.2.2.3). The DOE uses both  
33 scaling and simplification to develop the consequences of this scenario. Similar to the E1 and  
34 E2 scenarios, BRAGFLO and related computer codes are executed with a deterministic  
35 sequence of future events to develop reference behavior for the E1E2 consequences (see  
36 Figure 6-34). Scaling is used to estimate the consequences for events occurring at different  
37 times than those used in the BRAGFLO calculations. Simplifying assumptions are used to  
38 develop the consequences of E1E2 occurrences in different waste panels or the consequences  
39 of a different sequence of future events leading to the E1E2 scenario than assumed in the  
40 deterministic BRAGFLO calculation.



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**Figure 6-33. Code Configuration for Disturbed Performance Scenarios E1 and E2**

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**Figure 6-34. Code Configuration for Disturbed Performance Scenario E1E2**

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Reference behavior for brine flow to the Culebra in the E1E2 scenario is predicted by the BRAGFLO disposal system model. This is the same model used to predict brine flow to the Culebra for the E1 and E2 scenarios. The geometry of the grid used is the same as that depicted in Figures 6-13 through 6-16; however, different assumptions are used about the borehole development through time. Even though the E1E2 scenario includes at least two boreholes intersecting the panel, the model used included only one borehole column. As will be described, the assumptions used about the manner in which brine mixes in the intruded panel are such that two boreholes are not needed to represent flow through the waste. The assumptions about the development of the borehole are related to the most likely (that is, most probable) sequence of events that gives rise to the E1E2 scenario.

Ninety-two percent of all deep boreholes are the E2 type (see Section 6.4.12.6). Therefore, it is most probable that the first borehole into any panel is an E2 borehole. In a BRAGFLO calculation after 1,000 years of undisturbed performance, the properties of the column of elements in BRAGFLO representing the borehole are changed. The changed properties represent the E2 borehole after the Rustler plug has degraded and silty sand fills the borehole. The period during which the plug is effective is not modeled to develop reference behavior for the E1E2 Culebra releases because relatively little happens in the disposal system during the time that the Rustler plug is effective. Reference conditions are developed with the E1 intrusion that follows the initial E2 intrusion occurring after the 200 years that it takes Rustler plugs to degrade because it is more probable that a subsequent E1 intrusion occurs after the Rustler plug has degraded. It is assumed that the E1 intrusion occurs 1,000 years after the E2 borehole becomes filled with silty sand, at a simulation time of 2,000 years. At 2,000 years, the properties of the section of the borehole below the repository horizon are changed to represent an open borehole (the E1 intrusion), allowing flow between the Castile brine reservoir and the repository. After another 200 years, the lower section is assumed to become filled with silty sand; after another 1,000 years, the permeability of the lower section is decreased one order of magnitude because of salt creep. These changes are documented in Table 6-29.

**Table 6-29. Changes in BRAGFLO Borehole Properties in Developing Reference Behavior for the E1E2 Scenario**

Time (years)	Borehole Portion	Properties
0-1,000	All	Undisturbed conditions
1,000-2,000	Above waste panel	Silty sand
	Below waste panel	Undisturbed conditions
2,000-2,200	Above waste panel	Silty sand
	Below waste panel	Open borehole between panel and Castile
2,200-3,200	Above waste panel	Silty sand
	Below waste panel	Silty sand
3,200-10,000	Above waste panel	Silty sand
	Below waste panel	Silty sand, permeability decreased 1 order of magnitude



1 Thus, above the waste panel, the E1E2 borehole evolves as an E2 borehole from 1,000 years  
2 to 10,000 years. Below the waste panel, the borehole evolves as an E1 borehole from 2,000  
3 to 10,000 years. At 2,200 years, there will be two boreholes above the waste panels with  
4 silty-sand properties. The assumption about upper borehole permeability most consistent with  
5 the assumption made for this scenario of complete mixing in the panel (discussed below) is  
6 that the upper portion of the E1 borehole is relatively impermeable and all flow that might  
7 occur through it is diverted to the E2 borehole. Therefore, the permeability of the upper  
8 borehole remains that of the E2 borehole at 2,200 years.

9  
10 The concentration of actinides in liquid moving up the borehole assumes homogeneous mixing  
11 within the panel and is calculated with the code PANEL. PANEL is a mixing-cell model that  
12 sums BRAGFLO fluxes into the waste panel from the boreholes and Salado as inputs to the  
13 cell and subtracts the flow up the borehole as a depletion from the model. Brine moving up  
14 the borehole is assumed to be at its greatest possible actinide concentration according to the  
15 dissolved and colloidal actinide source term models (Sections 6.4.3.5 and 6.4.3.6). In PANEL  
16 calculations, all actinides that enter the borehole are conservatively assumed to reach the  
17 Culebra.

18  
19 Random sampling of future events can produce different timing of borehole penetrations.  
20 From the time the E2 borehole penetrates until the E1 borehole penetrates, the consequences  
21 are determined as they are in the E2 scenario. When the E1 is drilled, completing the E1E2  
22 configuration, the consequences are assumed to be similar to the consequences modeled after  
23 the E1 penetration for the reference calculation, accounting for radionuclide decay and  
24 ingrowth.

25  
26 Random sampling of future events can also produce a different sequence of borehole types.  
27 In a randomly sampled future with many E2 intrusions into a waste panel prior to the E1, the  
28 consequences are determined as they are for the E2 scenario until the E1 occurs, at which  
29 time the E1E2 consequences are used. In a randomly sampled future with the sequence E1  
30 then E2, the consequences are assumed to be similar to an E1 event until the E2 is drilled,  
31 whereupon the consequences are assumed to be similar to the E1E2 event following the E1  
32 drilling. In a randomly sampled future with two E1 boreholes, the consequences are assumed  
33 to be similar to an E1 borehole until the second E1 is drilled, at which time the consequences  
34 are assumed to be similar to the E1E2 behavior.

35  
36 For computational simplicity, the E1E2 calculations are scaled to E1 intrusions following a  
37 prior E2 intrusion occurring at 100, 350, 3,000, 5,000, 7,000, and 9,000 years, similar to the  
38 treatment of the E1 and E2 reference conditions.

#### 39 40 6.4.13.6 Multiple Scenario Occurrences

41  
42 For long-term brine flow into the Culebra, scenario occurrences are effectively defined at the  
43 panel scale for this performance assessment. It was recognized in preliminary analysis of  
44 BRAGFLO results for this analysis that liquid flow between the separate panel and the rest of  
45 the repository is slow enough that the panel is effectively independent from the rest of the

1 repository. Gas flow does occur, and for this reason calculations of direct release to the  
2 surface are performed at the repository scale. For long-term brine flow to the Culebra, it is  
3 considered more reasonable, based on BRAGFLO results, to assume independent panel  
4 behavior in developing the CCDF rather than an interconnected repository.  
5

6 It is very important to distinguish between model results and model assumptions on this point.  
7 For disposal system performance, the DOE is not assuming that panel closures isolate panels  
8 from one another. Rather, the DOE has assigned reasonable properties to the panel closures  
9 as input to the BRAGFLO calculations and has found that the assignment of these reasonable  
10 properties results in limited liquid flow through them. Because simplification and scaling must  
11 be used to develop CCDFs, the DOE has to assume either that the repository is well  
12 interconnected or that the panels behave fairly independently. Based on model results for this  
13 analysis, the DOE has established that it is more reasonable in constructing a CCDF to assume  
14 that brine does not flow between panels. This is a simplification of results of the detailed  
15 modeling conducted in BRAGFLO, necessary for CCDF construction. It is not an assumption  
16 used in developing conceptual models of disposal system performance. This assumption does  
17 affect how scenario consequences are developed.  
18

19 There are 10 panels in the repository and the possibility of many intrusions. If panels behave  
20 independently as they are assumed to in developing consequences of long-term brine flow in  
21 the CCDF, it is possible for different configurations of boreholes (scenarios) to occur in  
22 different panels. For example, an E1E2 type situation might occur in one panel, an E2  
23 situation in a different panel, and an E1 situation in a third panel. In this example, there are  
24 essentially three scenario types occurring. For long-term release, the repository behaves as 10  
25 small modules (each comprising one panel), and a different borehole scenario can develop in  
26 each of those 10 modules. Long-term releases in CCDF construction are based on the  
27 premise that releases from each of these modules are independent and that the cumulative  
28 release from the repository is equal to the sum of the cumulative releases from the different  
29 modules.  
30

#### 31 6.4.13.7 Estimating Releases During Drilling for All Scenarios

32

33 The reference behavior for cuttings and cavings from the first intrusion into a pressurized  
34 repository, regardless of whether it is an E1 or E2 intrusion, is established by calculations  
35 performed in the CUTTINGS\_S code. Cavings releases are also dependent on the effective  
36 shear resistance to erosion (Appendix PAR, Parameter 33). The effects of radioactive decay  
37 are captured by calculating reference behavior for cuttings and cavings by the CUTTINGS\_S  
38 code at 100, 125, 175, 350, 1,000, 3,000, 5,000, 7,500, and 10,000 years.  
39

40 Spall and direct brine releases during drilling are also dependent on pressure conditions in the  
41 repository, and reference releases are calculated by CUTTINGS\_S for spall and by  
42 BRAGFLO\_DBR at 100, 350, 1,000, 3000, 5,000, and 10,000 years for intrusions into up-dip  
43 and down-dip (that is, northern and southern) panels. Spall releases are also dependent on the  
44 waste particle diameter (Appendix PAR, Parameter 32).  
45

1 Radionuclide releases from the processes in the CUTTINGS\_S code and direct brine release  
2 for intrusions occurring at intermediate times are scaled from the closest calculated releases,  
3 correcting for radioactive decay (see Section 6.4.12.3 and Figure 6-28). The cuttings and  
4 cavings portion of the CUTTINGS\_S releases are further adjusted to account for the  
5 distribution of CH- and RH-TRU waste streams (see Sections 6.4.12.3 and 6.4.12.4). The  
6 processes of spallings and direct brine release are assumed to involve a large enough volume  
7 of waste that it is reasonable to use homogeneous waste with average activity to estimate  
8 releases.

9  
10 For multiple-intrusion scenarios, the pressure in the repository at the time of the second and  
11 subsequent intrusions may be quite different from the pressure at the time of the first  
12 intrusion. This is expected because of the assumptions of relatively permeable boreholes  
13 adopted in performance assessment. Therefore, estimates of drilling releases to the accessible  
14 environment need to be formed for penetrations of a previously intruded repository. The  
15 reference behavior for these releases for subsequent intrusions is calculated by the  
16 CUTTINGS\_S code from BRAGFLO histories with E1- and E2-type intrusions at 350 and  
17 1,000 years. Repository conditions from the calculations of the effects of a subsequent  
18 E1-type penetration are used in consequence analysis for both E1- and E2-type intrusions that  
19 follow an E1 intrusion. Conditions from the subsequent E2 calculations are used for  
20 intrusions that follow E2 intrusions only. E1 conditions are used for multiple combinations of  
21 boreholes that include at least one E1 intrusion, based on the assumption that repository  
22 conditions will be dominated by Castile brine if any borehole connects to a brine reservoir.  
23 For futures in which more than two E2-type intrusions occur (and no E1-type intrusions  
24 occur), third and subsequent spall and direct brine releases are assumed to be the same as for  
25 the second release.

26  
27 For both E1 and E2 conditions following a 350-year intrusion, spall and direct brine release  
28 calculations are performed at 550, 750, 2,000, 4,000, and 10,000 years. For the 1,000-year  
29 E1 and E2 intrusions, spall and direct brine release calculations are performed at 1,200, 1,400,  
30 3,000, 5,000, and 10,000 years. Because the subsequent intrusion may penetrate either a  
31 previously-intruded panel or an unintruded panel, these calculations are done twice, once with  
32 initial conditions drawn from the previously-intruded panel in BRAGFLO, and once with  
33 conditions drawn from the BRAGFLO subsequent intrusion of the waste-disposal region. As  
34 is done for the first intrusion into a previously undisturbed repository, radionuclide releases  
35 from spall and direct brine release for intrusions occurring at intermediate times are scaled  
36 from the closest calculated releases, correcting for radioactive decay.

37  
38 After flow through the repository has occurred for some time, such as may occur in an E1E2  
39 scenario, portions of the repository may be depleted of actinides. In the estimate of releases  
40 during drilling, however, the possibility is not accounted for that random drilling might  
41 penetrate portions of the repository that have been depleted of actinides as a consequence of  
42 processes initiated by previous drilling. This is conservative because it tends to overestimate  
43 releases during drilling.

1 6.4.13.8 Estimating Releases in the Culebra and the Impact of the Mining Scenario

2  
3 Ten thousand-year SECOFL2D and SECOTP2D calculations are performed with Culebra  
4 transmissivity fields reflecting undisturbed performance (no future mining within the land  
5 withdrawal area) and disturbed performance (see Section 6.4.6.2.3). These calculations are  
6 performed with a unit source term of one kilogram of the actinide species of interest at  
7 100 years. Because transport as modeled is a linear process, scaling is used to estimate the  
8 consequences of time-variable concentrations and different times of intrusion (see Appendix  
9 CCDFGF, Section 4.9). As well, mining may occur at random times in the future. The effect  
10 of mining on releases in the Culebra is determined in the following manner.

11  
12 Boreholes intersecting the repository may provide a source of actinides to the Culebra with  
13 concentrations that vary through time. Until mining occurs, the transport behavior of  
14 actinides from these borehole sources is estimated by scaling the results of the undisturbed  
15 performance Culebra transport calculations. All actinides introduced into the Culebra by the  
16 time of mining are transported exclusively in the undisturbed performance flow fields. In other  
17 words, actinides in transit in the Culebra when mining occurs are assumed to be not affected  
18 by it and continue to be transported in the undisturbed flow field. Once mining occurs (it is  
19 assumed to occur instantaneously), the transport behavior of all actinides subsequently  
20 introduced into the Culebra is estimated by scaling the results of the disturbed performance  
21 flow fields.

22  
23 6.4.13.9 Final Construction of a Single CCDF

24  
25 After consequences for all of the sampled probabilistic futures have been estimated by the  
26 methodologies presented in the preceding sections, the information necessary to plot the  
27 CCDF associated with the probabilistic futures and the particular LHS vector is available.

28  
29 The sequences of future events used in this performance assessment were generated by  
30 random sampling. Thus, each sampled future is assigned an equal weight of occurrence for  
31 the construction of a CCDF. Each sequence of future events is assigned a weight of 1/10,000  
32 of occurrence because 10,000 futures are used for each CCDF. Before plotting, an additional  
33 step is performed in which the weights of futures with similar consequences are summed. The  
34 first step in the plotting process is to order the grouped futures according to normalized  
35 release, as discussed in Section 6.1.1, from lowest normalized release to highest. Following  
36 this ordering, the CCDF can be plotted by summing, for a given value of EPA normalized  
37 release, the probabilities of all futures whose normalized release exceeds the given value,  
38 where the probabilities are assumed to be equal to the weights. Because the releases  $cS$  have  
39 been ordered so that  $cS_i \leq cS_{i+1}$  for  $i=1 \dots, nS-1$ , the probability that  $cS$  exceeds a specific  
40 consequence value  $x$  is determined by the summation routine (duplicated from Section 6.1.1)

41  
42  
(14)

1 where  $i$  is the smallest integer such that  $cS_i > x$ . This completes an analysis of stochastic  
2 uncertainty for a particular vector of variable values from the LHS sampling.

#### 3 4 **6.4.14 CCDF Family**

5  
6 The process of CCDF construction described in Section 6.4.13 is repeated once for each  
7 vector of values of subjectively uncertain variables created by LHS. This process yields a  
8 family of CCDFs such as those presented in Section 6.5. This family of CCDFs provides a  
9 complete display of both stochastic and subjective uncertainty, as discussed in Section 6.1.2.

### 10 11 **6.5 Performance Assessment Results**

12  
13 This section contains results of the performance assessment and demonstrates that the WIPP  
14 complies with the quantitative containment requirements in 40 CFR § 191.13(a). See Section  
15 6.1 for a discussion of the containment requirements. Criteria for presenting the results of  
16 performance assessments are provided by the EPA in 40 CFR § 194.34, and are discussed in  
17 Section 6.1.3. These criteria are also summarized here for clarity.

18  
19 Additional detail about the results of the performance assessment is contained in Appendix  
20 SA, which describes sensitivity analyses conducted as the final step in the Monte Carlo  
21 analysis. These sensitivity analyses indicate the relative importance of each of the sampled  
22 parameters in terms of their contribution to uncertainty in the estimate of disposal system  
23 performance. Analyses also examine the sensitivity of intermediate performance measures to  
24 the sampled parameters. Examples of such intermediate performance measures include the  
25 quantity of radionuclides released to the accessible environment by any one mechanism (for  
26 example, cuttings or direct brine releases), and other model results that describe conditions of  
27 interest such as disposal region pressure.

#### 28 29 **6.5.1 Demonstrating Convergence of the Mean CCDF**

30  
31 As discussed in Sections 6.4.13 and 6.4.14, individual CCDFs for the WIPP are constructed  
32 by estimating cumulative radionuclide releases to the accessible environment for 10,000  
33 different possible futures. Each CCDF is calculated for a single LHS vector of input  
34 parameters and is conditional on the occurrence of that particular combination of parameter  
35 values. Multiple realizations of the performance assessment calculations yield a family of  
36 CCDFs in which each individual CCDF is generated from a different LHS vector. Families of  
37 CCDFs calculated for the WIPP performance assessment are based on 100 LHS vectors  
38 drawn from distributions of values for 57 imprecisely known parameters. As discussed in  
39 Section 6.1.2, mean and percentile CCDFs are constructed from families and provide  
40 summary measures of disposal system performance.

41  
42 Criteria provided by the EPA in 40 CFR Part 194.34 address the statistical interpretation of  
43 CCDFs:  
44

1 The number of CCDFs generated shall be large enough such that, at cumulative releases of 1 and  
2 10, the maximum CCDF generated exceeds the 99th percentile of the population of CCDFs with  
3 at least a 0.95 probability. Values of cumulative release shall be calculated according to Note 6  
4 of Table 1, Appendix A of Part 191 of this chapter. (40 CFR § 194.34(d))  
5

6 Any compliance application shall provide information which demonstrates that there is at least a  
7 95 percent level of statistical confidence that the mean of the population of CCDFs meets the  
8 containment requirements of § 191.13 of this chapter. (40 CFR § 194.34(f))  
9

10 Information provided by the EPA in the Background Information Document for 40 CFR Part  
11 194 clarifies the intent of these criteria.  
12

13 In 40 CFR part 194, EPA decided that the statistical portion of the determination of compliance  
14 with 40 CFR part 191 will be based on the sample mean. The LHS sample sizes should be  
15 demonstrated operationally (approximately 300 when 50 variables are considered) to improve  
16 (reduce the size of) the confidence interval for the estimated mean. The underlying principle is  
17 to show convergence of the mean. (EPA 1996b, 8-41)  
18

19 The DOE has chosen to demonstrate convergence of the mean and to address the associated  
20 criteria of 40 CFR Part 194 using an operational approach of multiple replication as proposed  
21 by Iman (1982). The complete set of performance assessment calculations was repeated three  
22 times with all aspects of the analysis identical except for the random seed used to initiate the  
23 LHS procedure. Thus, performance assessment results are available for three replicates, each  
24 based on an independent set of 100 LHS vectors drawn from identical CCDFs for imprecisely  
25 known parameters and propagated through an identical modeling system. This technique of  
26 multiple replication allows evaluation of the adequacy of the sample size chosen in the Monte  
27 Carlo analysis and provides a suitable measure of confidence in the estimate of the mean  
28 CCDF used to demonstrate compliance with 40 CFR § 191.13(a).  
29

### 30 **6.5.2 Complementary Cumulative Distribution Functions for the WIPP**

31 Families of CCDFs for each of the three replicates are shown in Figures 6-35, 6-36, and 6-37.  
32 Each figure contains 100 CCDFs. These figures address the criterion stated in 40 CFR  
33 § 194.34(e):  
34

35 Any compliance application shall display the full range of CCDFs generated.  
36  
37

38 Figures 6-35 through 6-37 show that all 300 CCDFs lie below and to the left of the limits  
39 specified in 40 CFR § 191.13(a). They also show qualitatively that the three replicates yield  
40 very similar results. Quantitative verification of the similarity of the three replicates is  
41 demonstrated in Figure 6-38, which shows the mean CCDFs calculated for each of the three  
42 replicates, together with an overall mean CCDF that is the arithmetic mean of the three  
43 individual mean CCDFs. Figure 6-38 demonstrates two key points. First, the overall mean  
44 CCDF lies entirely below and to the left of the limits specified in 40 CFR § 191.13(a). Thus,  
45 the WIPP is in compliance with the containment requirements of 40 CFR Part 191. Second,  
46 the sample size of 100 in each replicate is sufficient to generate a stable distribution of  
47 outcomes. Within the region of regulatory interest (that is, at probabilities greater than

1  $10^{-3}/10^4$  yr), the mean CCDFs from each replicate are essentially indistinguishable from the  
2 overall mean at the resolution of the figure. Figure 6-39 provides quantitative confirmation of  
3 the sufficiency of the sample size, by displaying the overall mean together with the 0.95  
4 confidence interval of the Student's t-distribution estimated from the individual means of the  
5 three independent replicates (Iman 1982), as shown in Figure 3-38.

6  
7 Figure 6-40 provides additional summary information about the distributions of CCDFs  
8 resulting from the three replicates. This figure shows CCDFs representing the mean, median,  
9 and 10th and 90th percentile CCDFs from each replicate, together with the overall mean.  
10 Note that for each type of CCDF (for example, the 10th percentile), curves from each  
11 replicate overlie closely. This provides quantitative verification of the qualitative observation  
12 that distributions from each replicate appear similar. Note also that the mean CCDFs lie to  
13 the right of the 90th percentile CCDFs at probabilities less than approximately  $10^{-2}/10^4$  yr.  
14 This is a result of the strongly skewed distribution, with the location of the mean being  
15 dominated by the relatively small number of CCDFs associated with the largest normalized  
16 releases.

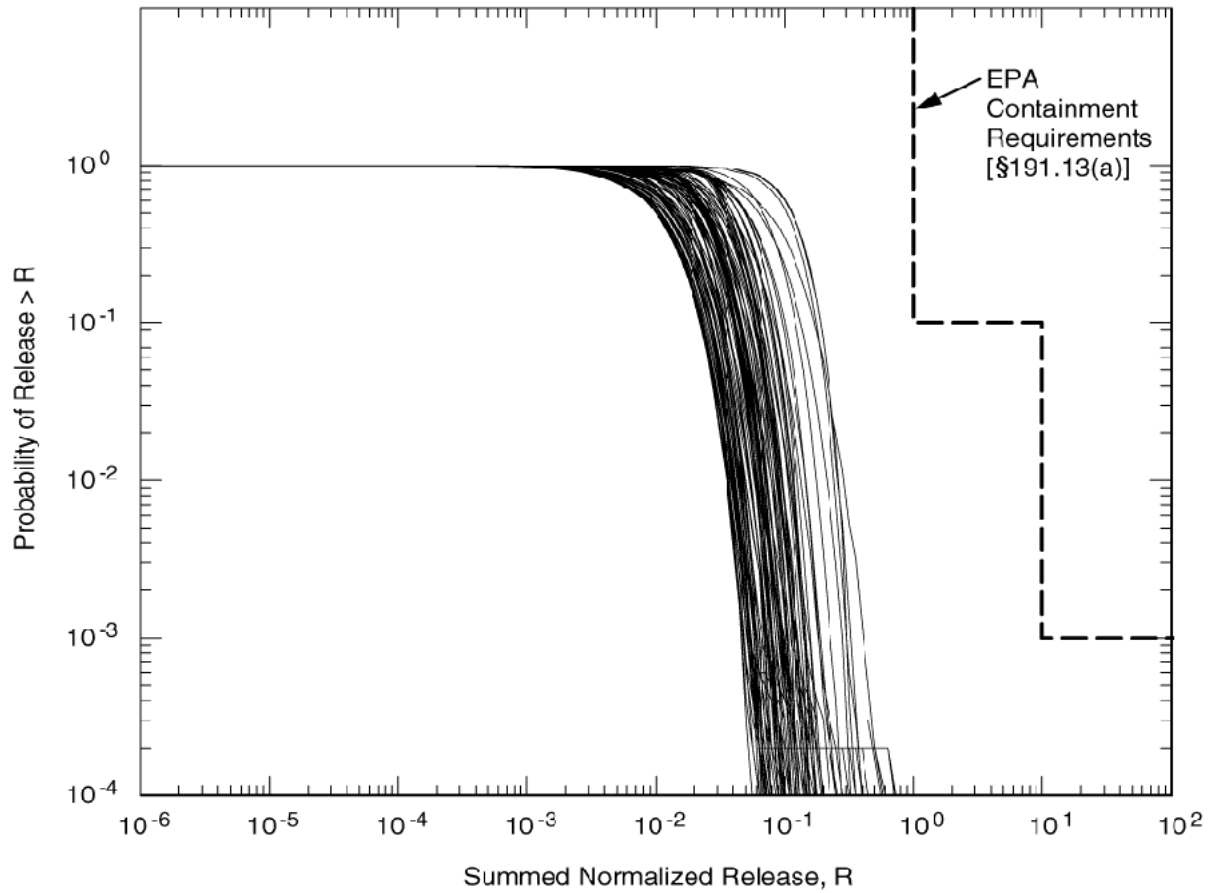
### 17 **6.5.3 Release Modes Contributing to the Total Radionuclide Release**

18 Radionuclide releases to the accessible environment can be grouped into four categories  
19 according to their mode of release:

- 20 (1) cuttings and cavings releases,
- 21 (2) spallings releases,
- 22 (3) releases resulting from the direct release of brine at the surface during drilling, and
- 23 (4) releases in the subsurface following transport in groundwater.

24  
25 Each of these four modes has the potential to contribute to the total quantity of radionuclides  
26 released from the repository, and therefore each has the potential to affect the position of the  
27 mean CCDF.

28  
29 Figure 6-41 provides a display of the relative contribution of each mode to the total release.  
30 Releases for each of the three replicates are similar, and results are shown for replicate 1 only  
31 for simplicity. Mean CCDFs are shown for the total normalized release (this curve is also  
32 shown in Figure 6-40 and is the mean of the family shown in Figure 6-35) and for the  
33 normalized releases resulting from cuttings and cavings, spallings, and direct brine release.  
34 The mean CCDF for subsurface releases resulting from groundwater transport is not shown  
35 because those releases were less than  $10^{-6}$  EPA units and the CCDF cannot be shown at the  
36 scale of this figure. Releases from cuttings and cavings are shown to be the most important  
37 contributors to the location of mean CCDF, with spallings also making a small contribution.  
38 Direct brine releases are less important, and have very little effect on the location of the mean  
39  
40  
41  
42  
43  
44



CCA-134-3

**Figure 6-35. Distribution of CCDFs for Normalized Radionuclide Releases to the Accessible Environment from the WIPP, Replicate 1**

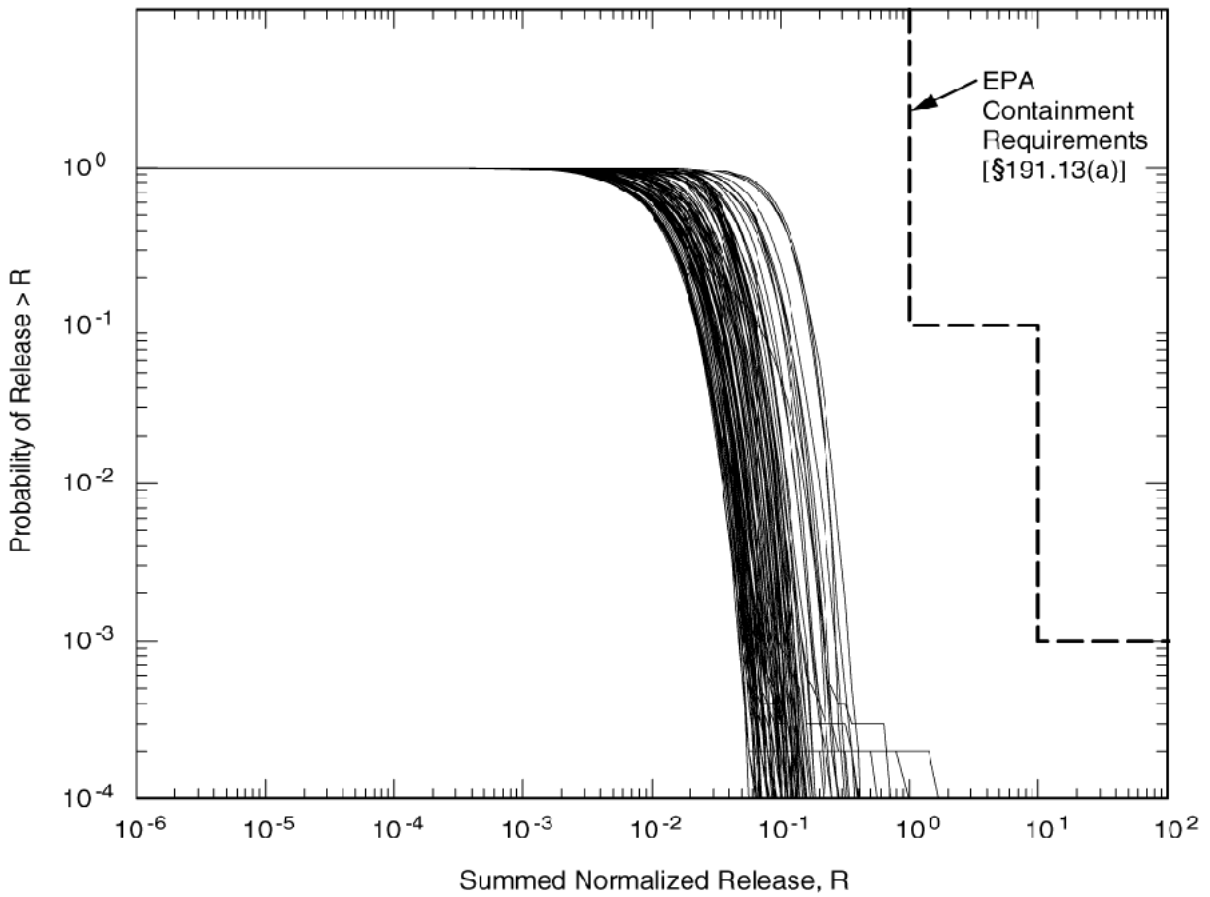


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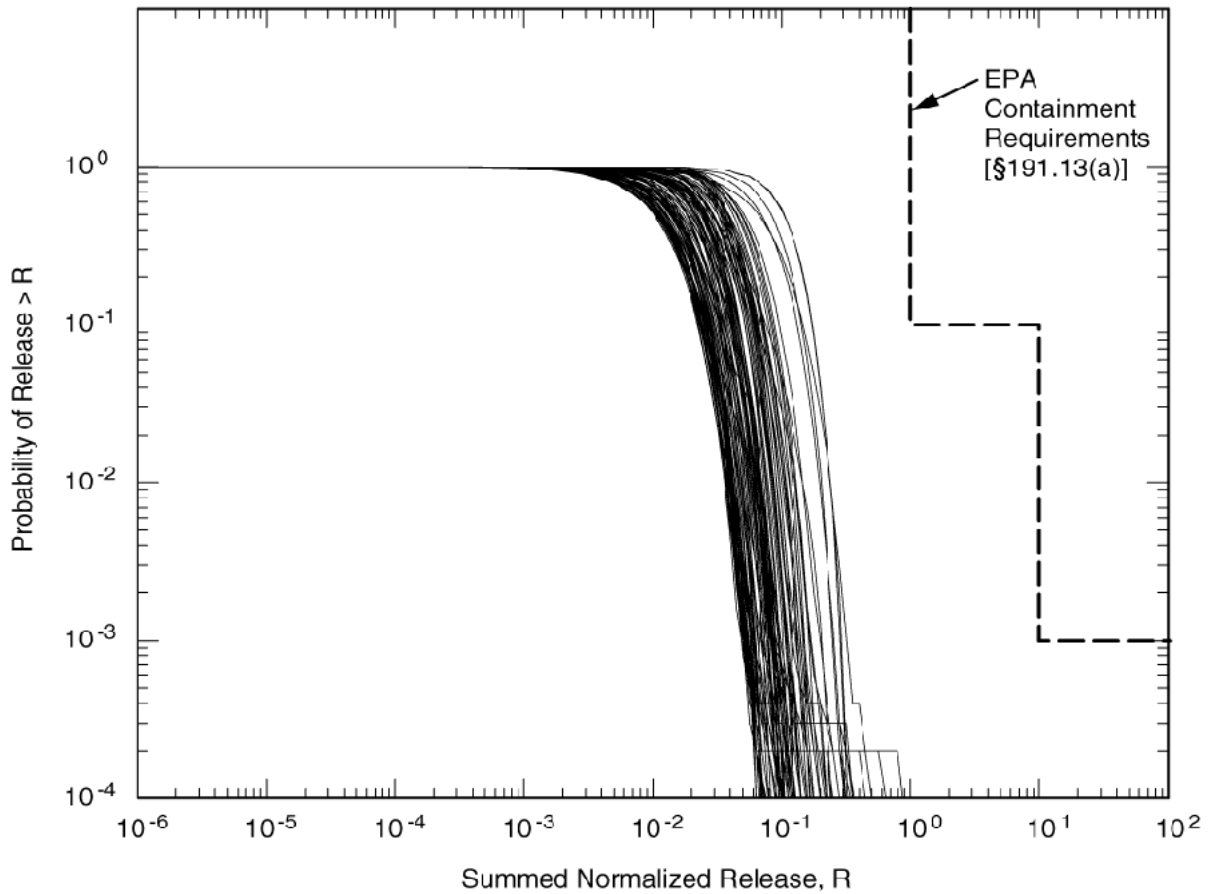
**Figure 6-36. Distribution of CCDFs for Normalized Radionuclide Releases to the Accessible Environment from the WIPP, Replicate 2**

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CCA-136-3

**Figure 6-37. Distribution of CCDFs for Normalized Radionuclide Releases to the Accessible Environment from the WIPP, Replicate 3**

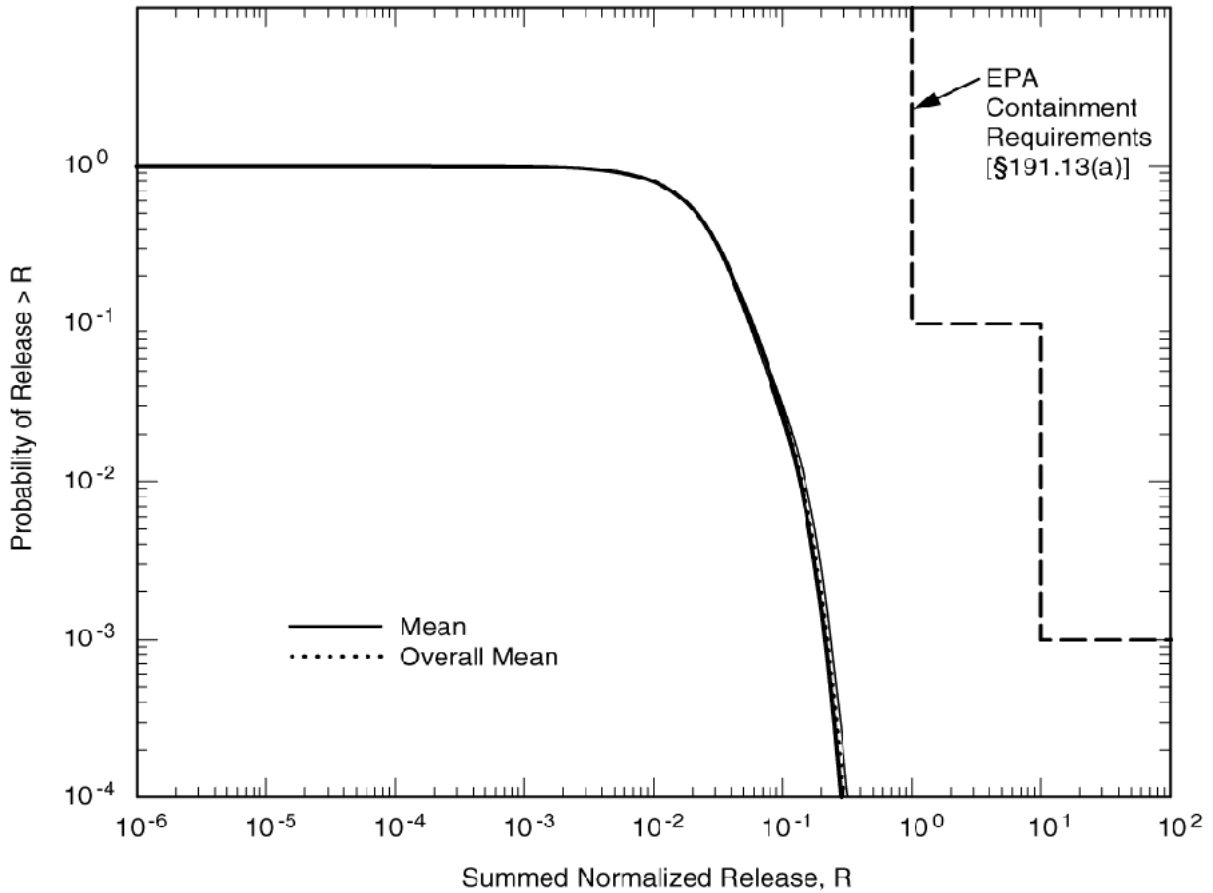
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CCA-137-3

Note: Four CCDFs are shown, including three individual mean CCDFs calculated for each of the three distributions of CCDFs calculated for the three replicates and shown in Figures 6-35, 6-36, 6-37, and an overall mean CCDF that is the arithmetic mean of the three individual mean CCDFs.

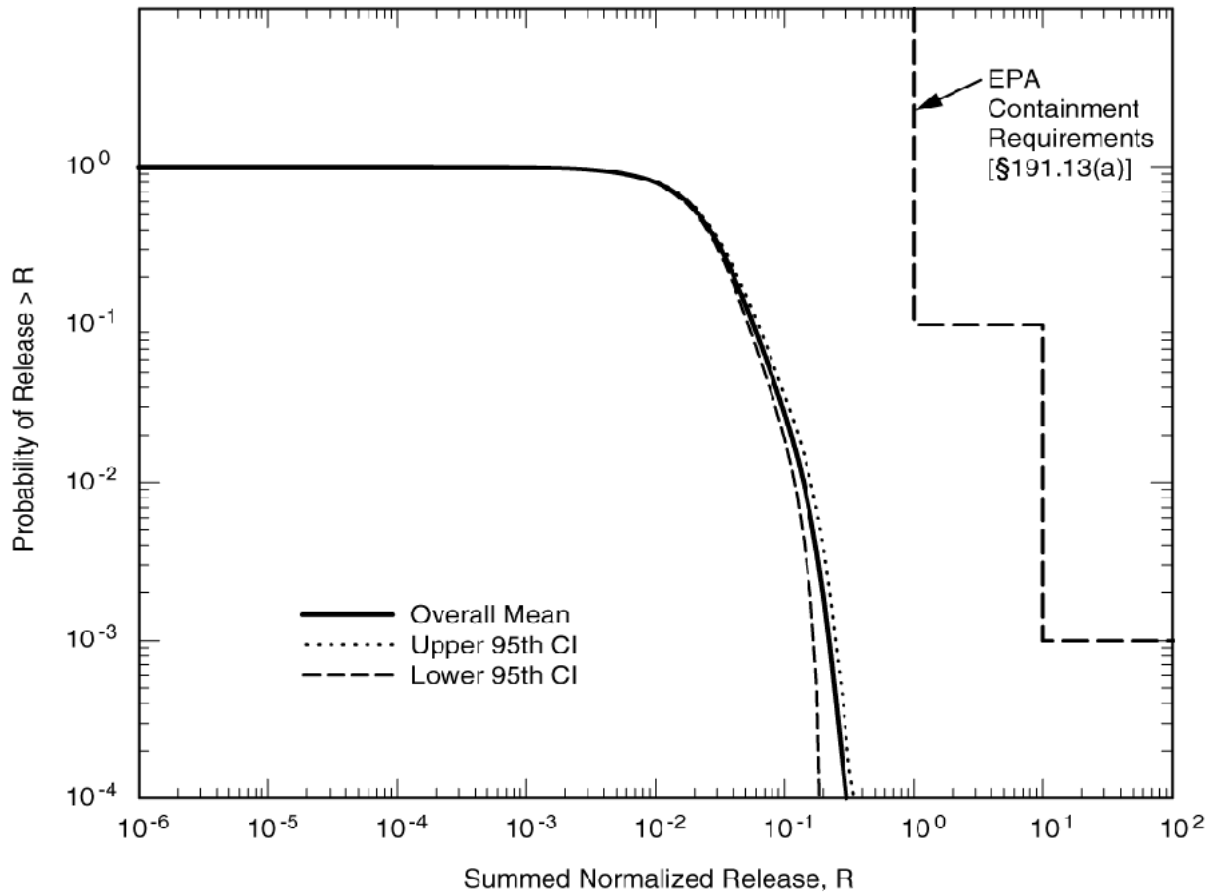
**Figure 6-38. Mean CCDFs for Normalized Radionuclide Releases to the Accessible Environment**

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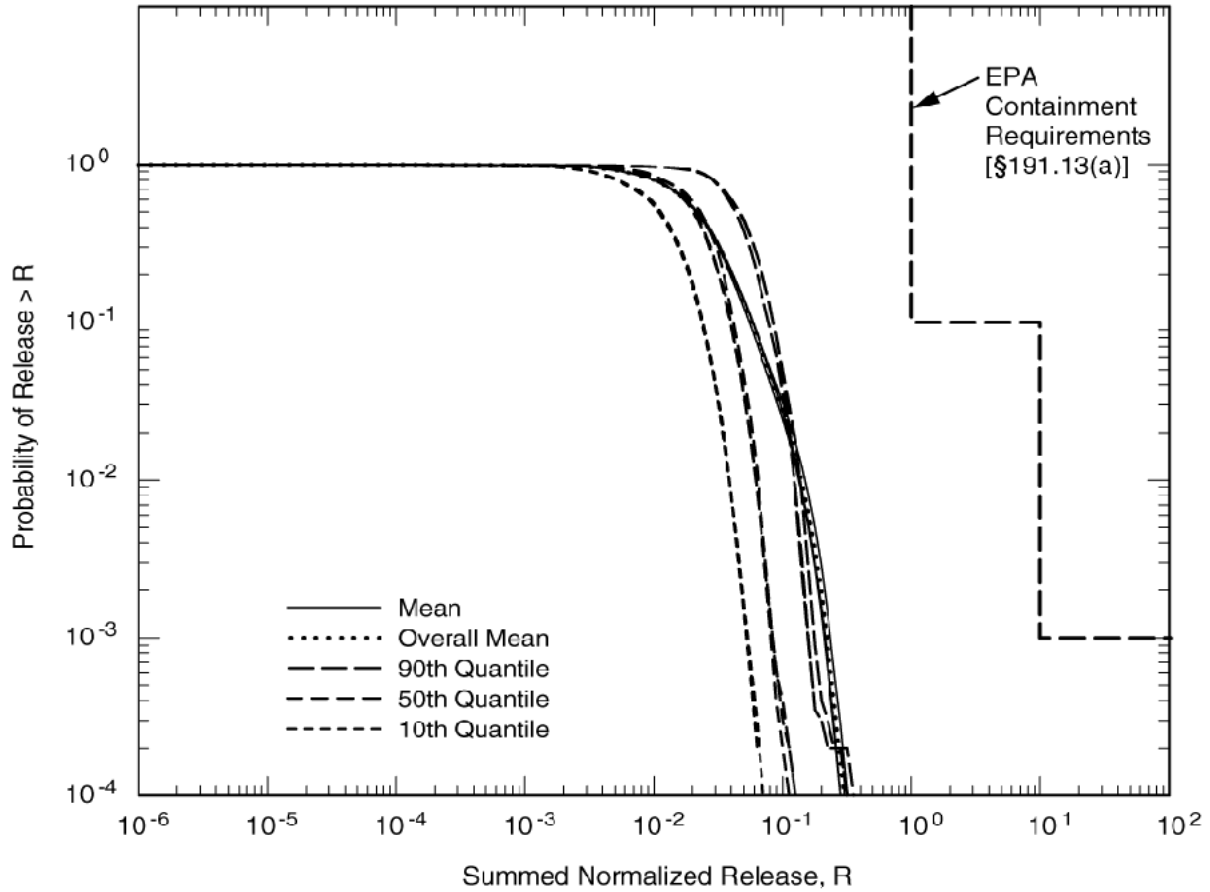


CCA-138-3

Note: The overall mean CCDF shown in Figure 6-38 is repeated together with the 0.95 confidence interval of the Student-t distribution estimated from the three individual mean CCDFs.

**Figure 6-39. Confidence Levels for the Mean CCDF**

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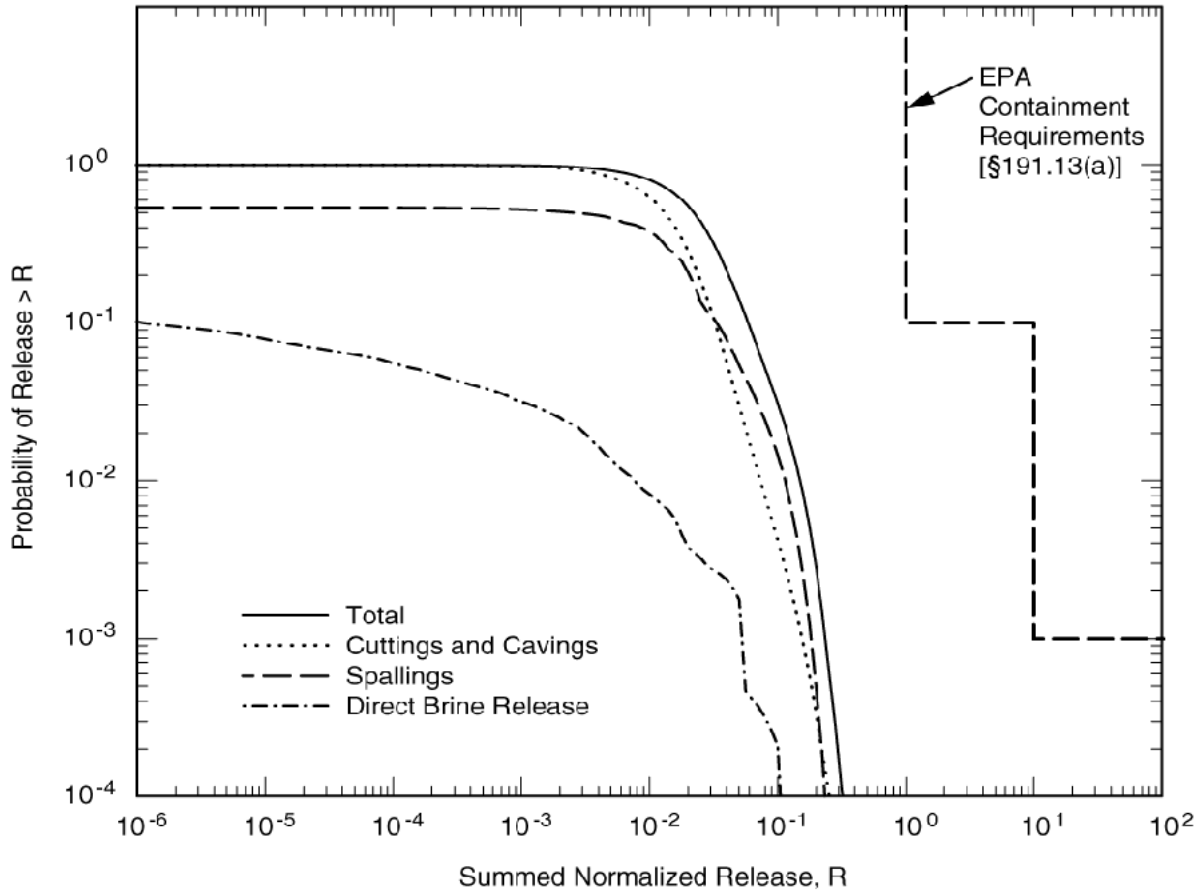


CCA-139-3

Note: Mean, median, and 10th and 90th percentile CCDFs are shown together with the overall mean. These CCDFs are based on the distributions of CCDFs shown in Figures 6-35, 6-36, and 6-37.

**Figure 6-40. Summary CCDFs for Replicates 1, 2, and 3**

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CCA-140-3

Note: Mean CCDFs are shown for the total normalized release (this curve is also shown in Figure 6-40 and is the mean of the family shown in Figure 6-35) and for the normalized releases resulting from cuttings and cavings, spallings, and direct brine release. The mean CCDF for subsurface releases resulting from groundwater transport is not shown because those releases were less than  $10^{-6}$  EPA units and the CCDF cannot be shown at the scale of this figure.

**Figure 6-41. Mean CCDFs for Specific Release Modes, Replicate 1**



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1 CCDF. Subsurface groundwater releases are not important, and have essentially no effect on  
2 the mean CCDF. See Appendix SA for additional discussion of the relative importance of the  
3 release modes.

#### 4 5 **6.5.4 Uncertainty and the Role of Conservatism in the Compliance Demonstration**

6  
7 As defined in 40 CFR § 191.12, performance assessments must “estimate the cumulative  
8 releases of radionuclides, considering the associated uncertainties, caused by all significant  
9 events and processes.”

10  
11 Site characterization, repository design, and waste characterization activities, as described in  
12 Chapters 2.0, 3.0, and 4.0, respectively, have removed much uncertainty from the analysis.  
13 Uncertainties remain, however, about how best to characterize some aspects of the disposal  
14 system and how best to model the complex interactions between the waste and its surrounding  
15 environment. These remaining uncertainties have been incorporated in the performance  
16 assessment to the extent practicable through the use of reasonable and realistic assumptions  
17 about models and parameter values.

18  
19 In general, the DOE has not attempted to bias the performance assessment toward a  
20 conservative outcome, and the mean CCDF represents a reasonable estimate of the expected  
21 and, in the case of future human activities including intrusion, prescribed, performance of the  
22 disposal system. However, where realistic approaches to incorporating uncertainty are  
23 unavailable or impractical and where the impact of the uncertainty on performance is small,  
24 the DOE has chosen to simplify the analysis by implementing reasonable and conservative  
25 assumptions. These conservative assumptions are reviewed here, not because they bias the  
26 location of the mean CCDF, but rather because an understanding of their effects contributes  
27 qualitatively to the “reasonable expectation, on the basis of the record before the  
28 implementing agency, that compliance with [§] 191.13(a) will be achieved,” as required by  
29 40 CFR § 191.13(b).

30  
31 As noted in Section 6.2 and Appendix SCR, in some cases processes have been omitted from  
32 the modeling system for simplicity because the only possible effects of including them would  
33 be beneficial to system performance. Examples include the decision to model radionuclide  
34 dissolution as an equilibrium process (assuming instantaneous leaching and dissolution), and  
35 the decision not to model sorption of radionuclides in the Salado or in the seal system.

36  
37 In other cases, the DOE has made conservative decisions during the design of the conceptual  
38 and computational models, as listed in Table 6-30. Some conservative assumptions listed in  
39 this table are mentioned below. For example, within the repository portion of the BRAGFLO  
40 model, fluid flow in a single panel is treated as if all rooms were a single void (that is, pillars  
41 are omitted). This treatment allows brine flow to and from an intrusion borehole to contact  
42 more waste than it would if it followed a more realistic flow path between rooms. The effect  
43 is conservative with respect to brine flow up a plugged and abandoned borehole. Similarly,

**Table 6-30. Conservative Model and Parameter Assumptions Used in Performance Assessment (from Appendix MASS, Table MASS-1)**

Conservative Assumption	Code	Cross-Reference
Long-term flow up plugged and abandoned boreholes is modeled as if all intrusions occur into a down-dip (southern) panel.	BRAGFLO	Section 6.4.3
Pillars and individual drifts in rooms, and panel closures in the nine lumped panels, are not modeled for long-term performance, and containers provide no barrier to fluid flow.	BRAGFLO	Section 6.4.3, Appendix MASS, Section MASS.5
Panel closures are modeled with the same permeability as the surrounding DRZ.	BRAGFLO	Sections 6.4.3.2 and 6.4.5.3 MASS Attachment 7-1
Brine in the repository will contain a uniform mixture of dissolved and solid-state species. No microenvironments that influence the overall chemical conditions will persist.	NUTS PANEL	Section 6.4.3.4 Appendix SOTERM, Section SOTERM.2.2
Radionuclide dissolution to solubility limits is instantaneous.	NUTS PANEL	Sections 6.4.3.5 and 6.4.3.4 (Appendix SOTERM, Section SOTERM.3.3, SCR.2.5.3.1)
Radionuclides are not retarded by shaft seals.	NUTS	Section 6.4.4 Section SCR.2.5.4.2
Shaft concrete components are modeled as if they degrade 400 years after emplacement.	BRAGFLO	Section 6.4.4 Appendix PAR, Table PAR-19
The permeability of the DRZ is constant and higher than intact Salado.	BRAGFLO	Section 6.4.5.3 Appendix MASS, Section MASS.13.4
The unnamed lower member, Tamarisk, and Forty-niner are assumed to be impermeable.	BRAGFLO SECOFL2D	Sections 6.4.6.1, 6.4.6.3, and 6.4.6.5 Appendix MASS, Section MASS.14
Sorption on clays present in the Culebra is not modeled.	SECOFL2D	Section 6.4.6.2.1 Appendix MASS, Section MASS.15.2
Particle waste shear based on properties of marine clays, considered a worst case.	CUTTINGS_S	Section 6.4.7.1 Appendix PAR, Parameter 33
The concentration of actinides in liquid moving up the borehole in the E1E2 scenario assumes homogeneous mixing within the panel.	CCDFGF PANEL	Section 6.4.13.5

**Table 6-30. Conservative Model and Parameter Assumptions Used in Performance Assessment (from Appendix MASS, Table MASS-1) (Continued)**

Conservative Assumption	Code	Cross-Reference
For all direct releases to the surface and the E1E2 source term to the Culebra, any actinides that enter the borehole are assumed to reach the surface or Culebra.	CUTTINGS_S BRAGFLO_DBR PANEL CCDFGF	Section 6.4.7.1 Section 6.4.13.5
Retardation is assumed to not occur in the Salado.	NUTS CCDFGF	Section 6.4.5.4.2
Depletion of actinides in parts of the repository that have been penetrated by boreholes is not accounted for in calculating the releases from subsequent intrusions at such locations.	CUTTINGS_S	Section 6.4.13.7
Hydraulically-significant fractures are assumed to be present everywhere in the Culebra.	SECOTP2D	Section 6.4.6.2.1

the DOE has chosen to model fluid flow through plugged and abandoned boreholes as if all intrusions occurred into a down-dip (that is, southern) panel. As modeled, downdip panels tend to have more brine in them than up-dip panels and this assumption therefore may result in overestimating the amount of brine present in intruded panels. Radionuclide dissolution to solubility limits is modeled as instantaneous. The DRZ around the panel closures is assumed not to heal and panel closures are assumed to be no more effective than the surrounding DRZ, tending to overestimate the amount of fluid flow between panels. For E1E2 scenarios, complete mixing is assumed within the intruded panel, and all brine that flows out of the panel and up the borehole is assumed to have been in contact with waste.

Within the shaft seal system, concrete components are modeled as if they degrade 400 years after emplacement, underestimating their potential to limit fluid flow over the long-term. For direct releases and E1E2 releases to the Culebra, processes of actinide transport and retardation are not modeled within the intrusion borehole and all actinides that enter the borehole are assumed to be transported to the surface or into an overlying transmissive unit. Within the Culebra (which modeling indicates will be the only transmissive unit that will receive long-term flow from the borehole), hydraulically significant fractures are assumed for modeling simplicity to be present everywhere, even though test data indicate that the portions of the Culebra above the waste disposal region behave as an unfractured, single porosity matrix.

These conservative assumptions have not significantly affected the location of the mean CCDF, which, as shown in Section 6.5.3, is dominated by cuttings and cavings releases that are, with one exception, independent of the conservative simplifications described here. As discussed in Appendix SA (Section SA.1), the parameter making the largest contribution to uncertainty in the location of the mean CCDF is the effective shear resistance of the waste,

1 which affects the quantity of waste eroded from the borehole wall and transported to the  
2 surface as cavings. In the absence of data describing the reasonable and realistic future  
3 properties of degraded waste and backfill, effective shear resistance of the waste is a  
4 parameter for which the DOE has selected a conservative distribution (see Appendix PAR,  
5 Parameter 33).  
6

### 7 **6.5.5 Summary of the Demonstration of Compliance with the Containment** 8 **Requirements**

9  
10 The WIPP is in compliance with the containment requirements of 40 CFR § 191.13(a), as  
11 shown by Figures 6-35 through 6-39. Figures 6-38 and 6-39 demonstrate that the sample size  
12 of 100 chosen for this analysis is sufficient to provide the level of statistical confidence  
13 specified in 40 CFR § 194.34.  
14

15 Additional confidence in the compliance determination comes from examination of  
16 Figure 6-41, which shows that the location of the mean CCDF depends almost entirely on the  
17 relatively simple processes that contribute to cuttings and cavings releases resulting from  
18 inadvertent human intrusion by drilling. Uncertainties related to the characterization of the  
19 natural system and the interaction of waste with the disposal system environment have little  
20 effect on long-term performance. The natural and engineered barrier systems, as described in  
21 Chapters 2.0 and 3.0, provide robust and effective containment of TRU waste even if the  
22 repository is penetrated by multiple borehole intrusions.  
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