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

Appendix TRU WASTE**



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

**Carlsbad Field Office
Carlsbad, New Mexico**

Appendix TRU WASTE

Table of Contents

1

2 TRU WASTE-1.0 INTRODUCTION1

3 TRU WASTE-1.1 Purpose.....2

4 TRU WASTE-1.2 Scope.....3

5 TRU WASTE-2.0 WASTE CHARACTERIZATION ANALYSIS4

6 TRU WASTE-2.1 Introduction.....4

7 TRU WASTE-2.1.1 Scope.....4

8 TRU WASTE-2.1.2 Updated Estimate of TRU Waste Inventory4

9 TRU WASTE-2.2 Summary of Waste Components and Characteristics10

10 TRU WASTE-2.2.1 Waste Characterization Analysis10

11 TRU WASTE-2.2.2 Relationship Between Inventory Data and

12 Performance Assessment13

13 TRU WASTE-2.3 Components That Affect Performance: Curie Content.....14

14 TRU WASTE-2.3.1 Radioactivity Included in the Waste Unit Factor.....16

15 TRU WASTE-2.3.2 Radioactivity Included in the Source Term for

16 Performance Assessment18

17 TRU WASTE-2.3.2.1 Radionuclides Included in Direct Releases

18 by Cuttings, Cavings, and Spalling.....22

19 TRU WASTE-2.3.2.2 Radionuclides Included in Direct Releases

20 of Brine to the Surface22

21 TRU WASTE-2.3.2.3 Radionuclides Included in Releases to the

22 Culebra Aquifer23

23 TRU WASTE-2.3.2.4 Radionuclides Included in Releases Through

24 the Salado.....24

25 TRU WASTE-2.3.2.5 Radionuclides Excluded From Source

26 Terms24

27 TRU WASTE-2.4 Radionuclide Characteristics: Solubility and Colloid Formation24

28 TRU WASTE-2.4.1 Components and Characteristics Influencing

29 Solubility.....28

30 TRU WASTE-2.4.1.1 Components Influencing Redox

31 Environment29

32 TRU WASTE-2.4.1.2 Components Influencing pH and CO₂

33 Fugacity30

34 TRU WASTE-2.4.1.3 Waste Components That Directly Enhance

35 Solubility.....31

36 TRU WASTE-2.4.2 Components and Characteristics Influencing

37 Colloidal Actinide Mobility32

38 TRU WASTE-2.5 Nonradioactive Waste Components and Characteristics34

39 TRU WASTE-2.5.1 Gas Generation.....34

40 TRU WASTE-2.5.2 Components and Characteristics Influencing Physical

41 Properties36

42 TRU WASTE-2.5.2.1 Compressibility36

43 TRU WASTE-2.5.2.2 Strength.....37

44 TRU WASTE-2.5.2.3 Permeability.....38

1 TRU WASTE-2.5.3 Components and Characteristics Affecting Heat
 2 Generation.....39
 3 TRU WASTE-2.5.3.1 Exothermal Reactions.....39
 4 TRU WASTE-2.5.3.2 RH-TRU Thermal Heat Load40
 5 TRU WASTE-2.6 Summary.....40

6 TRU WASTE-3.0 WASTE COMPONENTS LIMITS43
 7 TRU WASTE-3.1 Radionuclide Components.....43
 8 TRU WASTE-3.2 Ferrous and Ferrous Alloy Components.....45
 9 TRU WASTE-3.3 CPR Materials, Nitrate, and Sulfate Components46
 10 TRU WASTE-3.4 Solid Components.....46
 11 TRU WASTE-3.5 Water Components.....47
 12 TRU WASTE-3.6 Humic Substances Components.....47
 13 TRU WASTE-3.7 Nonferrous Metal Components.....48
 14 TRU WASTE-3.8 Organic Ligands Components.....48

15 TRU WASTE-4.0 WASTE CHARACTERIZATION49
 16 TRU WASTE-4.1 Acceptable Knowledge50
 17 TRU WASTE-4.2 Radioassay50
 18 TRU WASTE-4.3 Radiography.....50
 19 TRU WASTE-4.4 Visual Examination.....50

20 TRU WASTE-5.0 WIPP WASTE INFORMATION SYSTEM52

21 References.....53

22 **List of Figures**

23 Figure TRU WASTE-1. Waste Characterization Cycle..... 2
 24 Figure TRU WASTE-2. Waste Components, the Associated Waste Characteristics,
 25 and a Performance Assessment Code Related to Each
 26 Characteristic 12
 27 Figure TRU WASTE-3. Flow Chart for Inventory Input into Performance Assessment
 28 Waste Components, the Associated Waste Characteristics,
 29 and a Performance Assessment Code Related to Each
 30 Characteristic 15
 31 Figure TRU WASTE-4. Flow Diagram for Including Radionuclides in the Waste Unit
 32 Factor 19
 33 Figure TRU WASTE-5. Flow Diagram for Selecting Radionuclides for the Release
 34 Pathways Conceptualized by Performance Assessment (The
 35 top part of the diagram describes the criteria for selecting
 36 radionuclides in Table TRU WASTE-9) 20

List of Tables

1

2 Table TRU WASTE-1. Summary of Densities of Waste Materials 5

3 Table TRU WASTE-2. Summary of Activities for Radionuclides in the Disposal

4 Inventory (Decayed through 12/31/01)..... 5

5 Table TRU WASTE-3. Summary of Masses for Other Important Components 9

6 Table TRU WASTE-4. Waste Characteristics and Components Used in Performance

7 Assessment: Characteristics Expected to Have a Significant

8 Effect on Disposal System Performance..... 10

9 Table TRU WASTE-5. Waste Characteristics and Components Used in Performance

10 Assessment: Characteristics Expected to Have a Negligible

11 Effect on Disposal System Performance..... 11

12 Table TRU WASTE-6. Waste Characteristics and Components Not Used in

13 Performance Assessment 13

14 Table TRU WASTE-7. EPA Release Limits and Normalized Release Limits for

15 Radionuclides..... 16

16 Table TRU WASTE-8. Radionuclides That Contribute to the Waste Unit Factor 17

17 Table TRU WASTE-9. Radionuclides Included in the Performance Assessment

18 Source Term..... 21

19 Table TRU WASTE-10. Radionuclides Excluded From All Source Terms 25

20 Table TRU WASTE-11. Complexation Constants for Selected Metals 32

21 Table TRU WASTE-12. Colloid Concentration Factors 34

22 Table TRU WASTE-13. Maximum Temperature Increases..... 40

23 Table TRU WASTE-14. Waste Characteristics and Components Expected to be Most

24 Significant to Performance 41

25 Table TRU WASTE-15. Waste Characteristics and Components Expected to be Not

26 Significant 42

27 Table TRU WASTE-16. Emplacement Limits for Waste Components 44

1 **ACRONYMS AND ABBREVIATIONS**

2	AK	acceptable knowledge
3	BRAGFLO	BRine And Gas FLOW code
4	CBFO	Carlsbad Field Office
5	CCA	Compliance Certification Application
6	CCDF	complementary cumulative distribution function
7	CFR	Code of Federal Regulations
8	CH-TRU	contact-handled transuranic (waste)
9	CRA	Compliance Recertification Application
10	DOE, USDOE	United States Department of Energy
11	EDTA	ethylene diamine tetra-acetate
12	EPA, USEPA	United States Environmental Protection Agency
13	FEP	feature, event, and process
14	FR	Federal Register
15	K_d	equilibrium constant for distribution between solution and solid
16	LANL	Los Alamos National Laboratory
17	LWA	Land Withdrawal Act
18	NDA	nondestructive assay
19	NUTS	NUclide Transport System code
20	PA	performance assessment
21	PAPDB	Performance Assessment Parameter DataBase
22	PAVT	Performance Assessment Verification Test
23	RH-TRU	remote-handled transuranic (waste)
24	SNL	Sandia National Laboratories
25	TRU	transuranic
26	TWBIR	TRU Baseline Inventory Report
27	TWBID	TRU Waste Baseline Inventory Data Base
28	WAC	Waste Acceptance Criteria
29	WAP	Waste Analysis Plan
30	WIPP	Waste Isolation Pilot Plant
31	WSPF	Waste Stream Profile Form
32	WUF	waste unit factor
33	WWIS	WIPP Waste Information System

1 **TRU WASTE-1.0 INTRODUCTION**

2 The transuranic (TRU) waste inventory is expected to be updated for each recertification
3 application. The updated inventory will be evaluated to determine the effect of the waste and
4 waste characteristics on the long-term performance of the repository. The proper
5 implementation of the following five steps will ensure compliance with Title 40 Code of Federal
6 Regulations (CFR) Section 194.24:

- 7 (1) Collect/scale inventory data. As shown in Figure TRU WASTE-1, the update cycle begins
8 with the compilation of waste inventory data. This includes the waste that has been
9 emplaced in the repository and the waste that is anticipated for emplacement over the
10 operational life of the Waste Isolation Pilot Plant (WIPP). The anticipated waste inventory
11 data consist of waste that has been stored at TRU waste sites and projected estimates of
12 waste to be generated. For the purposes of performance assessment (PA), the projected
13 waste is then scaled to the allowable capacity that remains in the repository after
14 accounting for the stored and emplaced waste. The combined data (emplaced plus stored
15 plus scaled projected) account for the total WIPP waste inventory. The results of
16 conducting Step 1 of this process for CRA-2004 are reported in Appendix DATA,
17 Attachment F.
- 18 (2) Perform waste characterization analysis. The inventory is analyzed for new waste
19 components and/or changes to existing waste components that might affect the repository
20 system. This is a screening step using sensitivity analyses. If a component is determined
21 to impact repository performance it is placed on the list of “significant” waste components.
22 Some waste components indirectly influence repository performance and are placed on the
23 list of “negligible” waste components. All other components are screened out and are not
24 included in the PA calculations. The results of conducting Step 2 of this process for the
25 CRA-2004 are reported in Section TRU WASTE-2.0.
- 26 (3) Establish repository waste component limits. Waste components identified as “significant”
27 are examined to determine if changes in the previously established limits are needed. If the
28 inventory update shows substantial changes to the “significant” waste components, the
29 change may necessitate a new or different limit. A new or different waste component limit
30 will be established based upon the impact to the repository. The results of conducting Step
31 3 of this process for the CRA-2004 are reported in Section TRU WASTE-3.0.
- 32 (4) Characterize Waste. Waste characterization methods are developed or refined to quantify
33 the significant waste components. Waste characterization programs implement other
34 regulatory requirements, but for purposes of CRA-2004, this appendix will only address
35 those elements relevant to long-term compliance. The results of conducting Step 4 of this
36 process for the CRA-2004 are reported in Section TRU WASTE-4.0.

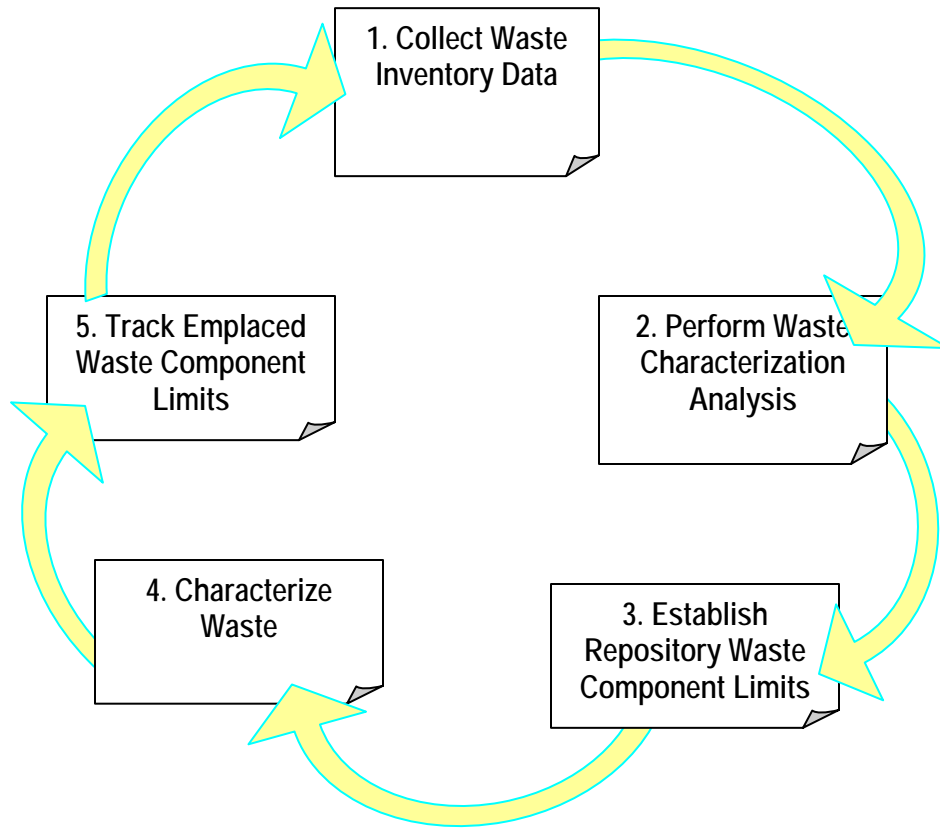


Figure TRU WASTE-1. Waste Characterization Cycle

- (5) Track emplaced waste component limits. Waste component data are tracked and reported. The WIPP Waste Information System (WWIS) is used to capture the waste component data for waste emplaced in the repository. The WWIS is a tool used by the personnel at the TRU waste sites and at WIPP to control and track the waste emplaced in the repository. Once a year, the Department of Energy (DOE) provides the Environmental Protection Agency (EPA) with a report containing the values for each of the significant waste components. The emplaced waste data is compiled every five years (or as necessary) for updating the waste inventory, and the cycle repeats itself. The description of Step 5 of this process is reported in Section TRU WASTE-5.0.

TRU WASTE-1.1 Purpose

This appendix provides information in accordance with 40 CFR § 194.24 for the waste characteristics and components important to the containment of waste in the disposal system over the regulatory performance period of 10,000 years. The characteristics and components of the waste are based on the current TRU waste descriptions and inventory presented in Appendix DATA, Attachment F. This appendix describes the assessment of the waste characteristics associated with the chemical, radiological, and physical composition of existing and projected TRU waste destined for disposal at the WIPP. It also identifies those waste components that

1 significantly influence waste characteristics, and establishes reasonable upper and lower waste
2 component disposal limits. Based on the component limits and their associated uncertainties, a
3 set of characterization techniques are established. Waste components are controlled, tracked,
4 and inventoried upon emplacement in the repository. The cycle represented in Figure TRU
5 WASTE-1 repeats as this characterization information provides key input data for future PAs to
6 determine the impacts on the long-term containment of the disposal system.

7 Section TRU WASTE-2.0 addresses the requirements specified in 40 CFR § 194.24(b) to
8 identify those waste components and their characteristics that can influence the containment of
9 waste and that are included as inputs to the computer models used in PAs. This section identifies
10 and assesses these parameters based on the DOE's current understanding of the disposal system
11 behavior and the updated waste descriptions and inventory totals since submittal of the
12 Compliance Certification Application (CCA). Section TRU WASTE2.3 also discusses the
13 rationale for exclusion of specific waste characteristics or components expected not to influence
14 releases from the disposal system.

15 Section TRU WASTE-3.0 shows the total limits for each identified significant component. This
16 section addresses the requirement of 40 CFR § 194.24(c)(1) to establish limiting values for each
17 component identified in Section TRU WASTE-2.0 as important to the performance of the
18 repository system. The rationale for these limits is also discussed.

19 Section TRU WASTE-4.0 identifies and describes the methods used to quantify the limits for the
20 waste components identified as potentially significant to the long-term performance of the
21 disposal system. This section addresses the requirements of 40 CFR § 194.24(c)(2) and (3).

22 Section TRU WASTE-5.0 describes a system of controls (WWIS) that address the requirements
23 of 40 CFR § 194.24(c)(4) and (5).

24 **TRU WASTE-1.2 Scope**

25 This appendix supercedes the information previously presented in the following appendices of
26 the CCA:

- 27 • Appendix WCA, Waste Characterization Analysis. The modeled long-term performance
28 of the disposal system is evaluated based on current inventory information contained in
29 Appendix DATA, Attachment F and on current disposal system behavior assumptions.
- 30 • Appendix WCL, Waste Component Limits. The limits for waste components determined
31 important to the disposal system are established based on results of the CRA-2004 PA
32 and the outcome of the current waste characterization analysis.
- 33 • Appendix WAP, Waste Analysis Plan. The characterization methods used to quantify the
34 waste components determined important to the performance of the disposal system are
35 established. Existing documentation that details the current characterization methods is
36 referenced.

1 **TRU WASTE-2.0 WASTE CHARACTERIZATION ANALYSIS**

2 Section TRU WASTE-2 summarizes relevant information on the emplaced and anticipated TRU
3 waste inventories (detailed in Appendix DATA, Attachment F), identifies changes to PA and
4 compliance assessment, and provides conclusions pertaining to whether the waste characteristics
5 and waste components previously identified as significant to performance remain significant.

6 **TRU WASTE-2.1 Introduction**

7 ***TRU WASTE-2.1.1 Scope***

8 Waste components are the elements that make up the waste (e.g., radionuclides, paper and other
9 cellulosic materials, steel drums that contain the waste, solidified organic and inorganic sludges,
10 etc.). These components have characteristics with the potential to impact disposal system
11 performance. For example, paper is a component of the waste and a substrate for microbes in the
12 repository. The ability of the paper to act as a substrate for microbial gas production is a
13 characteristic of the paper. Microbes metabolizing paper can produce carbon dioxide, methane,
14 and other gaseous metabolic products, which can increase the pressure in a waste panel and
15 potentially impact the performance of the repository.

16 Sensitivity analysis is used to determine limiting values and associated uncertainties in the waste
17 characteristics and components as required in 40 CFR § 194.24 (c). Sensitivity analyses and
18 calculations related to features, events, and processes (FEPs) associated with the CCA,
19 Performance Assessment Verification Test (PAVT) (DOE 1997), and Appendix PA have
20 identified those waste characteristics and components that are included or excluded in the PA.
21 Sections TRU WASTE-2.2 through 2.5 identify those waste components and waste
22 characteristics and components that influence the containment of waste and thus are included as
23 inputs to the computer codes used in PA.

24 ***TRU WASTE-2.1.2 Updated Estimate of TRU Waste Inventory***

25 In the certification of WIPP, the EPA concluded that the estimates provided in Appendix BIR of
26 the CCA represented the best information available at that time (Federal Register [FR] 63 27354,
27 May 18, 1998). The EPA recognized that the WIPP waste inventory may change as the DOE
28 characterizes the contents of containers of TRU waste prior to shipment to WIPP and as new
29 wastes are generated in the future. The EPA also concluded that the WIPP waste inventory
30 estimates provided in Appendix BIR of the CCA were sufficient for purposes of PA.

31 The inventory volume defined for WIPP emplacement to be used for PA calculations is the
32 “disposal inventory.” The WIPP Land Withdrawal Act (LWA), Pub. L. No. 104-201, 110 Stat.
33 2422 defines the total amount of TRU waste allowed in the WIPP as 175,564 m³ (6,200,000 ft³).
34 The “Agreement for Consultation and Cooperation” limits the remote-handled (RH)-TRU waste
35 inventory to 7,079 m³ (250,000 ft³) (State of New Mexico vs. DOE 1981). By difference, the
36 contact-handled (CH)-TRU waste inventory is limited to 168,485 m³ (5,950,000 ft³).

37 Since submittal of the CCA, DOE has updated its estimates of the TRU waste inventory destined
38 for disposal in the WIPP. A complete description of that process and its results are presented in
39 Appendix DATA, Attachment F. The following tables summarize information from Appendix

1 DATA, Attachment F that pertains to waste characterization analysis. Table TRU WASTE-1
 2 summarizes the current densities for the waste materials in the disposal inventory. Table TRU
 3 WASTE-2 summarizes the current activities for the radionuclides in the disposal inventory.
 4 Table TRU WASTE-3 summarizes the current mass of other important components in the
 5 disposal inventory.

6 **Table TRU WASTE-1. Summary of Densities of Waste Materials**

Waste Material	Average Mass Density in CH-TRU Waste (kg/m ³)	Average Mass Density in RH-TRU Waste (kg/m ³)
Fe-base Metal/Alloys	1.1×10^2	1.1×10^2
Al-base Metal/Alloys	1.4×10^1	2.5×10^0
Other Metal/Alloys	3.0×10^1	3.2×10^1
Other Inorganic Materials	4.2×10^1	3.5×10^1
Cellulosic Materials	5.8×10^1	4.5×10^0
Rubber Materials	1.4×10^1	3.1×10^0
Plastic Materials	4.2×10^1	4.9×10^0
Solidified Inorganic Material	7.7×10^1	3.9×10^1
Cement (Solidified)	2.9×10^1	8.7×10^{-1}
Vitrified Material	6.2×10^0	5.7×10^{-2}
Solidified Organic Material	1.6×10^1	4.0×10^0
Soils	1.9×10^1	2.6×10^1
Packaging Material, Steel	1.7×10^2	4.8×10^2
Packaging Material, Plastic	1.6×10^1	1.4×10^0
Packaging Material, Lead	1.4×10^{-2}	4.4×10^2

Source: Appendix DATA, Attachment F. Data reported in Appendix DATA, Attachment F includes information known by the TRU waste sites as of September 30, 2002.

7 **Table TRU WASTE-2. Summary of Activities for Radionuclides in the Disposal Inventory**
 8 **(Decayed through 12/31/01)**

Radionuclide	CH-TRU Waste Concentration (Ci/m ³)	RH-TRU Waste Concentration (Ci/m ³)	CH-TRU Waste (Ci)	RH-TRU Waste (Ci)
²²⁵ Ac	9.21×10^{-6}	5.20×10^{-6}	1.55×10^0	3.68×10^{-2}
²²⁷ Ac	3.00×10^{-6}	5.65×10^{-10}	5.06×10^{-1}	4.00×10^{-6}
²²⁸ Ac	2.84×10^{-5}	2.02×10^{-5}	4.79×10^0	1.43×10^{-1}
^{109m} Ag	7.49×10^{-10}	NR	1.26×10^{-4}	NR
¹¹⁰ Ag	2.61×10^{-16}	2.71×10^{-15}	4.40×10^{-11}	1.92×10^{-11}
^{110m} Ag	1.98×10^{-14}	2.06×10^{-13}	3.34×10^{-9}	1.46×10^{-9}

1

Table TRU WASTE-2. Summary of Activities for Radionuclides in the Disposal Inventory (Decayed through 12/31/01) — Continued

Radionuclide	CH-TRU Waste Concentration (Ci/m ³)	RH-TRU Waste Concentration (Ci/m ³)	CH-TRU Waste (Ci)	RH-TRU Waste (Ci)
²⁴¹ Am	2.38×10^0	1.93×10^0	4.01×10^5	1.36×10^4
²⁴² Am	2.79×10^{-7}	1.20×10^{-7}	4.70×10^{-2}	8.52×10^{-4}
^{242m} Am	2.83×10^{-7}	2.77×10^{-5}	4.78×10^{-2}	1.96×10^{-1}
²⁴³ Am	1.25×10^{-4}	1.01×10^{-4}	2.10×10^1	7.15×10^{-1}
²⁴⁵ Am	7.79×10^{-16}	NR	1.31×10^{-10}	NR
²¹⁷ At	9.22×10^{-6}	5.21×10^{-6}	1.55×10^0	3.69×10^{-2}
^{137m} Ba	5.38×10^{-2}	4.74×10^1	9.06×10^3	3.36×10^5
²¹⁰ Bi	1.53×10^{-5}	2.98×10^{-11}	2.58×10^0	2.11×10^{-7}
²¹¹ Bi	2.97×10^{-6}	5.58×10^{-10}	5.00×10^{-1}	3.95×10^{-6}
²¹² Bi	3.47×10^{-5}	3.82×10^{-4}	5.84×10^0	2.70×10^0
²¹³ Bi	9.20×10^{-6}	5.20×10^{-6}	1.55×10^0	3.68×10^{-2}
²¹⁴ Bi	3.73×10^{-5}	1.92×10^{-10}	6.29×10^0	1.36×10^{-6}
²⁴⁹ Bk	5.39×10^{-11}	NR	9.07×10^{-6}	NR
²⁵⁰ Bk	2.17×10^{-17}	NR	3.65×10^{-12}	NR
¹⁴ C	7.19×10^{-6}	2.90×10^{-4}	1.21×10^0	2.05×10^0
¹⁰⁹ Cd	7.58×10^{-10}	NR	1.28×10^{-4}	NR
^{113m} Cd	NR	2.31×10^{-5}	NR	1.64×10^{-1}
¹⁴¹ Ce	NR	5.33×10^{-23}	NR	3.77×10^{-19}
¹⁴⁴ Ce	2.11×10^{-9}	2.56×10^{-4}	3.56×10^{-4}	1.82×10^0
²⁴⁹ Cf	4.53×10^{-7}	1.18×10^{-7}	7.64×10^{-2}	8.37×10^{-4}
²⁵⁰ Cf	1.09×10^{-6}	2.11×10^{-6}	1.83×10^{-1}	1.50×10^{-2}
²⁵¹ Cf	2.16×10^{-9}	2.25×10^{-8}	3.64×10^{-4}	1.59×10^{-4}
²⁵² Cf	1.23×10^{-6}	2.50×10^{-6}	2.08×10^{-1}	1.77×10^{-2}
²⁴² Cm	2.34×10^{-7}	1.01×10^{-7}	3.94×10^{-2}	7.15×10^{-4}
²⁴³ Cm	2.36×10^{-6}	6.92×10^{-5}	3.97×10^{-1}	4.90×10^{-1}
²⁴⁴ Cm	6.86×10^{-2}	3.82×10^{-2}	1.16×10^4	2.70×10^2
²⁴⁵ Cm	5.00×10^{-8}	1.50×10^{-6}	8.42×10^{-3}	1.06×10^{-2}
²⁴⁶ Cm	9.21×10^{-6}	9.53×10^{-5}	1.55×10^0	6.74×10^{-1}
²⁴⁷ Cm	1.65×10^{-15}	1.33×10^{-3}	2.77×10^{-10}	9.44×10^0
²⁴⁸ Cm	5.43×10^{-7}	2.58×10^{-7}	9.14×10^{-2}	1.83×10^{-3}
²⁵⁰ Cm	3.94×10^{-16}	NR	6.64×10^{-11}	NR
⁶⁰ Co	5.85×10^{-6}	2.38×10^{-1}	9.85×10^{-1}	1.68×10^3
¹³⁴ Cs	1.22×10^{-7}	4.75×10^{-3}	2.05×10^{-2}	3.36×10^1
¹³⁵ Cs	NR	9.75×10^{-9}	NR	6.90×10^{-5}
¹³⁷ Cs	5.73×10^{-2}	5.15×10^1	9.65×10^3	3.65×10^5
¹⁵² Eu	1.16×10^{-5}	9.82×10^{-2}	1.95×10^0	6.95×10^2
¹⁵⁴ Eu	9.82×10^{-6}	5.98×10^{-2}	1.65×10^0	4.23×10^2
¹⁵⁵ Eu	3.99×10^{-7}	2.61×10^{-3}	6.73×10^{-2}	1.85×10^1

Table TRU WASTE-2. Summary of Activities for Radionuclides in the Disposal Inventory (Decayed through 12/31/01) — Continued

Radionuclide	CH-TRU Waste Concentration (Ci/m ³)	RH-TRU Waste Concentration (Ci/m ³)	CH-TRU Waste (Ci)	RH-TRU Waste (Ci)
⁵⁵ Fe	NR	5.93×10^{-6}	NR	4.20×10^{-2}
²²¹ Fr	9.20×10^{-6}	5.20×10^{-6}	1.55×10^0	3.68×10^{-2}
²²³ Fr	4.10×10^{-8}	7.71×10^{-12}	6.91×10^{-3}	5.45×10^{-8}
¹⁵² Gd	2.61×10^{-19}	2.76×10^{-15}	4.40×10^{-14}	1.95×10^{-11}
³ H	1.29×10^{-3}	1.62×10^{-4}	2.17×10^2	1.15×10^0
¹²⁹ I	3.04×10^{-9}	1.16×10^{-5}	5.12×10^{-4}	8.20×10^{-2}
⁸⁵ Kr	2.74×10^{-6}	1.59×10^{-5}	4.62×10^{-1}	1.13×10^{-1}
⁵⁴ Mn	NR	2.58×10^{-4}	NR	1.82×10^0
²² Na	2.32×10^{-12}	4.17×10^{-5}	3.91×10^{-7}	2.95×10^{-1}
^{93m} Nb	NR	3.88×10^{-8}	NR	2.75×10^{-4}
⁹⁵ Nb	NR	1.06×10^{-17}	NR	7.53×10^{-14}
^{95m} Nb	NR	3.56×10^{-20}	NR	2.52×10^{-16}
⁵⁹ Ni	4.54×10^{-7}	3.25×10^{-3}	7.64×10^{-2}	2.30×10^1
⁶³ Ni	2.21×10^{-5}	1.58×10^{-1}	3.72×10^0	1.12×10^3
²³⁷ Np	2.85×10^{-5}	9.41×10^{-5}	4.80×10^0	6.66×10^{-1}
²³⁸ Np	1.40×10^{-9}	6.05×10^{-10}	2.36×10^{-4}	4.28×10^{-6}
²³⁹ Np	1.23×10^{-4}	8.87×10^{-6}	2.08×10^1	6.28×10^{-2}
^{240m} Np	7.75×10^{-12}	1.57×10^{-7}	1.31×10^{-6}	1.11×10^{-3}
²³¹ Pa	7.19×10^{-6}	2.53×10^{-9}	1.21×10^0	1.79×10^{-5}
²³³ Pa	2.82×10^{-5}	3.26×10^{-7}	4.75×10^0	2.31×10^{-3}
²³⁴ Pa	5.49×10^{-8}	3.99×10^{-7}	9.25×10^{-3}	2.82×10^{-3}
²³⁴ Pa ^m	4.22×10^{-5}	3.07×10^{-4}	7.11×10^0	2.17×10^0
²⁰⁹ Pb	9.21×10^{-6}	5.20×10^{-6}	1.55×10^0	3.68×10^{-2}
²¹⁰ Pb	1.55×10^{-5}	3.02×10^{-11}	2.61×10^0	2.13×10^{-7}
²¹¹ Pb	2.97×10^{-6}	5.59×10^{-10}	5.01×10^{-1}	3.95×10^{-6}
²¹² Pb	3.46×10^{-5}	3.80×10^{-4}	5.82×10^0	2.69×10^0
²¹⁴ Pb	3.74×10^{-5}	1.92×10^{-10}	6.30×10^0	1.36×10^{-6}
¹⁰⁷ Pd	NR	4.07×10^{-10}	NR	2.88×10^{-6}
¹⁴⁷ Pm	1.08×10^{-5}	4.96×10^{-2}	1.82×10^0	3.51×10^2
²¹⁰ Po	1.55×10^{-5}	3.01×10^{-11}	2.60×10^0	2.13×10^{-7}
²¹¹ Po	9.05×10^{-9}	1.70×10^{-12}	1.53×10^{-3}	1.20×10^{-8}
²¹² Po	2.21×10^{-5}	2.43×10^{-4}	3.72×10^0	1.72×10^0
²¹³ Po	9.01×10^{-6}	5.09×10^{-6}	1.52×10^0	3.60×10^{-2}
²¹⁴ Po	3.74×10^{-5}	1.92×10^{-10}	6.30×10^0	1.36×10^{-6}
²¹⁵ Po	2.97×10^{-6}	5.59×10^{-10}	5.00×10^{-1}	3.95×10^{-6}
²¹⁶ Po	3.45×10^{-5}	3.80×10^{-4}	5.82×10^0	2.69×10^0
²¹⁸ Po	3.68×10^{-5}	1.89×10^{-10}	6.19×10^0	1.34×10^{-6}
¹⁴⁴ Pr	2.07×10^{-9}	2.51×10^{-4}	3.49×10^{-4}	1.78×10^0
²³⁶ Pu	2.60×10^{-9}	NR	4.38×10^{-4}	NR

Table TRU WASTE-2. Summary of Activities for Radionuclides in the Disposal Inventory (Decayed through 12/31/01) — Continued

Radionuclide	CH-TRU Waste Concentration (Ci/m ³)	RH-TRU Waste Concentration (Ci/m ³)	CH-TRU Waste (Ci)	RH-TRU Waste (Ci)
²³⁸ Pu	9.55×10^0	5.10×10^{-1}	1.61×10^6	3.61×10^3
²³⁹ Pu	3.92×10^0	7.59×10^{-1}	6.60×10^5	5.38×10^3
²⁴⁰ Pu	6.35×10^{-1}	2.37×10^{-1}	1.07×10^5	1.68×10^3
²⁴¹ Pu	1.43×10^1	1.58×10^1	2.40×10^6	1.12×10^5
²⁴² Pu	1.58×10^{-4}	6.69×10^{-5}	2.67×10^1	4.74×10^{-1}
²⁴³ Pu	1.63×10^{-15}	1.32×10^{-3}	2.74×10^{-10}	9.33×10^0
²⁴⁴ Pu	7.68×10^{-12}	1.56×10^{-7}	1.29×10^{-6}	1.10×10^{-3}
²²³ Ra	3.00×10^{-6}	5.64×10^{-10}	5.06×10^{-1}	3.99×10^{-6}
²²⁴ Ra	3.45×10^{-5}	3.80×10^{-4}	5.81×10^0	2.69×10^0
²²⁵ Ra	9.22×10^{-6}	5.21×10^{-6}	1.55×10^0	3.69×10^{-2}
²²⁶ Ra	3.78×10^{-5}	1.95×10^{-10}	6.37×10^0	1.38×10^{-6}
²²⁸ Ra	3.36×10^{-5}	2.38×10^{-5}	5.66×10^0	1.69×10^{-1}
¹⁰⁶ Rh	9.36×10^{-10}	9.59×10^{-6}	1.58×10^{-4}	6.79×10^{-2}
²¹⁹ Rn	2.97×10^{-6}	5.58×10^{-10}	5.00×10^{-1}	3.95×10^{-6}
²²⁰ Rn	3.45×10^{-5}	3.80×10^{-4}	5.82×10^0	2.69×10^0
²²² Rn	3.74×10^{-5}	1.93×10^{-10}	6.31×10^0	1.36×10^{-6}
¹⁰⁶ Ru	9.46×10^{-10}	9.60×10^{-6}	1.59×10^{-4}	6.79×10^{-2}
¹²⁵ Sb	2.99×10^{-8}	6.18×10^{-4}	5.04×10^{-3}	4.38×10^0
¹²⁶ Sb	NR	5.89×10^{-9}	NR	4.17×10^{-5}
^{126m} Sb	NR	4.21×10^{-8}	NR	2.98×10^{-4}
⁷⁹ Se	7.84×10^{-10}	6.29×10^{-6}	1.32×10^{-4}	4.46×10^{-2}
¹⁴⁷ Sm	2.83×10^{-15}	9.69×10^{-13}	4.78×10^{-10}	6.86×10^{-9}
¹⁵¹ Sm	3.37×10^{-4}	8.20×10^{-2}	5.68×10^1	5.80×10^2
^{121m} Sn	NR	7.28×10^{-8}	NR	5.15×10^{-4}
¹²⁶ Sn	NR	4.21×10^{-8}	NR	2.98×10^{-4}
⁹⁰ Sr	3.41×10^{-1}	3.48×10^1	5.75×10^4	2.46×10^5
⁹⁹ Tc	9.93×10^{-4}	2.25×10^{-2}	1.67×10^2	1.59×10^2
¹²³ Te	4.02×10^{-10}	NR	6.78×10^{-5}	NR
^{123m} Te	2.96×10^{-24}	NR	4.98×10^{-19}	NR
^{125m} Te	7.24×10^{-9}	1.50×10^{-4}	1.22×10^{-3}	1.06×10^0
²²⁷ Th	2.92×10^{-6}	5.50×10^{-10}	4.93×10^{-1}	3.89×10^{-6}
²²⁸ Th	3.49×10^{-5}	3.85×10^{-4}	5.89×10^0	2.72×10^0
²²⁹ Th	9.23×10^{-6}	5.21×10^{-6}	1.55×10^0	3.69×10^{-2}
²³⁰ Th	6.02×10^{-7}	5.31×10^{-8}	1.01×10^{-1}	3.76×10^{-4}
²³¹ Th	2.10×10^{-6}	7.38×10^{-6}	3.53×10^{-1}	5.23×10^{-2}
²³² Th	3.92×10^{-5}	3.08×10^{-5}	6.61×10^0	2.18×10^{-1}
²³⁴ Th	4.23×10^{-5}	3.07×10^{-4}	7.12×10^0	2.17×10^0
²⁰⁷ Tl	2.95×10^{-6}	5.55×10^{-10}	4.98×10^{-1}	3.93×10^{-6}
²⁰⁸ Tl	1.24×10^{-5}	1.37×10^{-4}	2.09×10^0	9.71×10^{-1}

Table TRU WASTE-2. Summary of Activities for Radionuclides in the Disposal Inventory (Decayed through 12/31/01) — Continued

Radionuclide	CH-TRU Waste Concentration (Ci/m ³)	RH-TRU Waste Concentration (Ci/m ³)	CH-TRU Waste (Ci)	RH-TRU Waste (Ci)
²⁰⁹ Tl	2.03×10^{-7}	1.14×10^{-7}	3.41×10^{-2}	8.10×10^{-4}
²³² U	9.76×10^{-6}	3.57×10^{-4}	1.64×10^0	2.53×10^0
²³³ U	7.34×10^{-3}	4.82×10^{-3}	1.24×10^3	3.41×10^1
²³⁴ U	9.95×10^{-4}	3.07×10^{-3}	1.68×10^2	2.17×10^1
²³⁵ U	7.84×10^{-6}	1.33×10^{-4}	1.32×10^0	9.42×10^{-1}
²³⁶ U	7.70×10^{-7}	2.01×10^{-4}	1.30×10^{-1}	1.42×10^0
²³⁷ U	1.28×10^{-4}	2.48×10^{-6}	2.15×10^1	1.75×10^{-2}
²³⁸ U	1.45×10^{-4}	1.83×10^{-2}	2.44×10^1	1.30×10^2
²⁴⁰ U	7.60×10^{-12}	1.54×10^{-7}	1.28×10^{-6}	1.09×10^{-3}
⁹⁰ Y	3.41×10^{-1}	3.43×10^1	5.74×10^4	2.43×10^5
⁹¹ Y	NR	1.15×10^{-16}	NR	8.11×10^{-13}
⁶⁵ Zn	1.38×10^{-15}	NR	2.32×10^{-10}	NR
⁹³ Zr	6.68×10^{-9}	4.79×10^{-5}	1.13×10^{-3}	3.39×10^{-1}
⁹⁵ Zr	NR	4.84×10^{-18}	NR	3.43×10^{-14}
Total:	3.16×10^1	1.88×10^2	5.33×10^6	1.33×10^6

Note: NR = Not Reportable

Source: Appendix DATA, Attachment F. Data reported in Appendix DATA, Attachment F includes information known by the TRU waste sites as of September 30, 2002.

1

Table TRU WASTE-3. Summary of Masses for Other Important Components

Component	Mass Contained in the Disposal Inventory (kg)
Acetic Acid	1.42×10^2
Sodium Acetate	8.51×10^3
Citric Acid	1.19×10^3
Sodium Citrate	4.00×10^2
Oxalic Acid	1.38×10^4
Sodium Oxalate	3.39×10^4
Sodium EDTA	2.56×10^1
Nitrate	2.51×10^6
Sulfate	4.21×10^5
Phosphate	1.05×10^5
Cement	1.2×10^7

Source: Appendix DATA, Attachment F. Data reported in Appendix DATA, Attachment F includes information known by the TRU waste sites as of September 30, 2002. Masses reported here are based on the disposal volume as defined in Appendix TRU WASTE, Section 2.1.2.

TRU WASTE-2.2 Summary of Waste Components and Characteristics

TRU WASTE-2.2.1 Waste Characterization Analysis

Tables TRU WASTE-4, TRU WASTE-5, and TRU WASTE-6 summarize the waste characteristics and waste components considered in this section. These tables provide:

- a list of the waste characteristics and components expected to have significant effect on disposal system performance (included in PA),
- a list of the waste characteristics and components expected to have negligible effect on disposal system performance, and
- a list of waste characteristics and components that were considered and excluded.

Table TRU WASTE-4 lists the waste characteristics and components that are included in PA because they would be expected to have a significant impact on repository performance. The waste characteristics and components listed in Table TRU WASTE-4 are identical to those listed in Table WCA-2 of the CCA. None of the inventory changes described in Appendix DATA, Attachment F led to an alternate conclusion regarding the relative importance of individual waste characteristics and components for PA.

Table TRU WASTE-4. Waste Characteristics and Components Used in Performance Assessment: Characteristics Expected to Have a Significant Effect on Disposal System Performance

Characteristic	Component	Effect on Performance	Section of Appendix TRU WASTE
Radioactivity of Each Isotope	Radionuclides	Used in Calculating Normalized Releases	2.3.1, 2.3.2
TRU Radioactivity at Closure	α -Emitting TRU Radionuclides, half-life > 20 Years	Determines Waste Unit Factor (WUF)	2.3.1
Solubility	Radionuclides	Actinide Mobility	2.4.1
Colloid Formation	Radionuclides, Soils, Cellulosic, Plastic, and Rubber (CPR) Materials	Actinide Mobility	2.4.2
Redox State	Radionuclides	Actinide Mobility	2.4.1
Redox Potential	Ferrous Metals	Actinide Oxidation State; Actinide Mobility	2.4.1.1
Gas (H ₂) Generation	Ferrous Metals	Increase in H ₂ Pressure	2.4.1.2, 2.5.1
Microbial Substrate: CH ₄ Generation	Cellulosic Materials	Increase in Gas Pressure	2.4.1.2, 2.5.1
Microbial Substrate: CH ₄ Generation	Plastic, Rubber Materials	Increase in Gas Pressure	2.4.1.2, 2.5.1
Particle Diameter	Solid Waste Components	Spalling Release	2.5.2

Table TRU WASTE-4. Waste Characteristics and Components Used in Performance Assessment: Characteristics Expected to Have a Significant Effect on Disposal System Performance — Continued

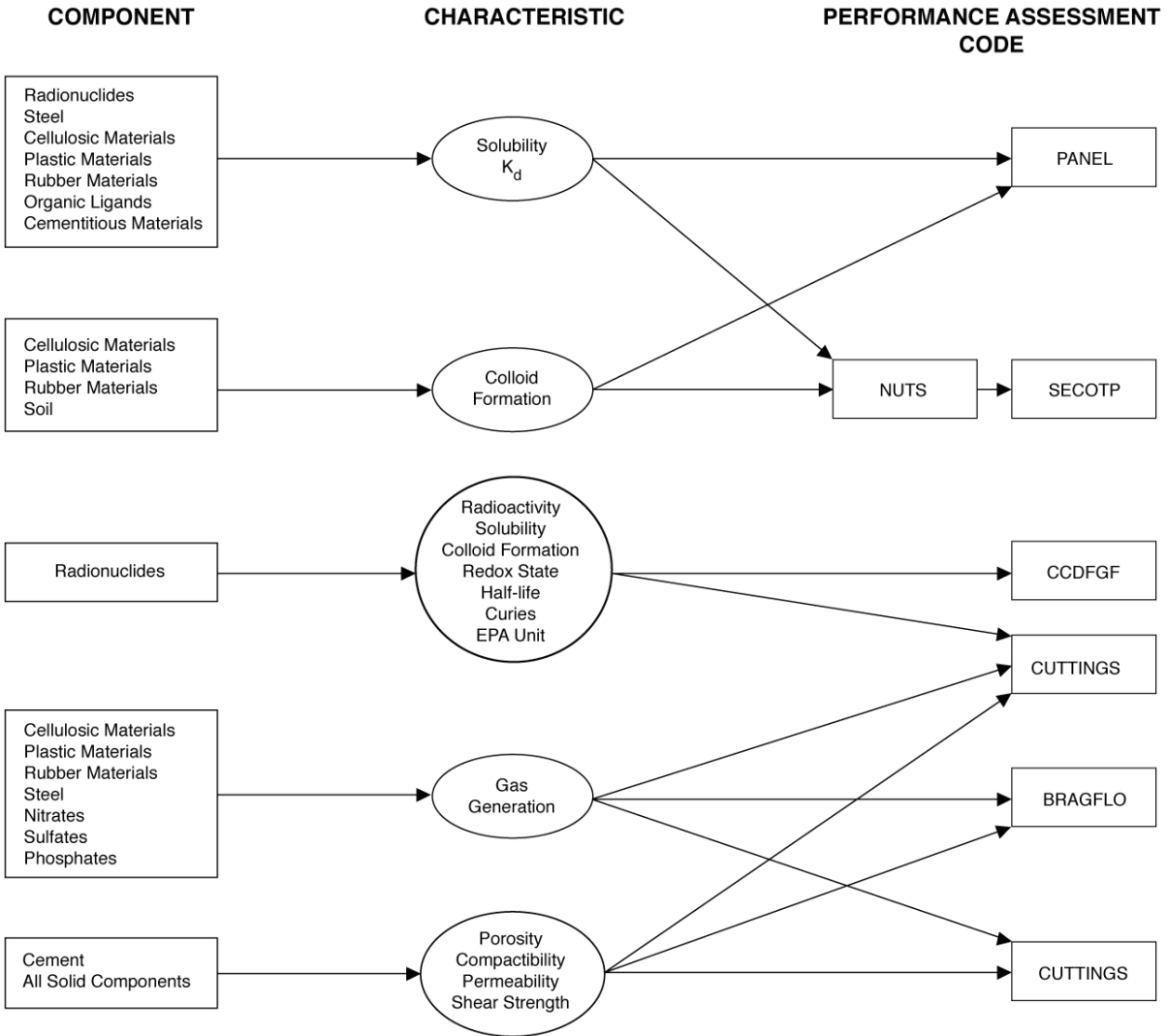
Characteristic	Component	Effect on Performance	Section of Appendix TRU WASTE
Microbial Nutrients: CH ₄ Generation	Sulfates	Increase in Gas Pressure	2.5.1
Microbial Nutrients: CH ₄ Generation	Nitrates	Increase in Gas Pressure	2.5.1
Compressibility and Shear Strength	Solid Waste Components	Effect on Creep Closure, Cuttings, Caving, Spallings	2.5.2

Table TRU WASTE-5 lists the waste characteristics and components that are included in PA, but would be expected to have a negligible impact on performance. For example, the impact of microbially generated CO₂ on performance is insignificant because the CO₂ will react with the MgO, forming Mg carbonate minerals that greatly reduce the impact of CO₂ on pH. The waste characteristics and components listed in Table TRU WASTE-5 are identical to those listed in Table WCA-3 of the CCA. None of the inventory changes described in Appendix DATA, Attachment F led to an alternate conclusion regarding the relative importance of individual waste characteristics and components for PA. Actual sensitivities of the analysis to waste characteristics and components are described in Appendix PA. The relationships between components, characteristics, and PA codes are illustrated in Figure TRU WASTE-2.

Table TRU WASTE-5. Waste Characteristics and Components Used in Performance Assessment: Characteristics Expected to Have a Negligible Effect on Disposal System Performance

Characteristic	Component	Effect on Performance	Section of Appendix TRU WASTE
Permeability	Solid Waste Components	Negligible Effect on Brine Movement, Gas Storage	2.5.2
Porosity	Solid Waste Components	Negligible Effect on Brine Movement	2.5.2
Microbial Nutrients, CO ₂ Generation	Sulfates ¹	Negligible: MgO Reacts with CO ₂	2.4.1.2
Microbial Nutrients, CO ₂ Generation	Nitrates ¹	Negligible: MgO Reacts with CO ₂	2.4.1.2, 2.5.1
Microbial Substrate: CO ₂ Generation	Cellulosic Materials	Negligible: MgO Reacts with CO ₂	2.4.1.2, 2.5.1
Microbial Substrate: CO ₂ Generation	Plastic Materials, Rubber Materials	Negligible: MgO Reacts with CO ₂	2.4.1.2, 2.5.1
Gas Generation	Water in the Waste	Enhances Initial Gas Generation	2.5.1

¹ These components are significant to gas generation and are therefore also listed in Table TRU WASTE-4.



1

2 **Figure TRU WASTE-2. Waste Components, the Associated Waste Characteristics, and a**
 3 **Performance Assessment Code Related to Each Characteristic**

4 Table TRU WASTE-6 lists the waste characteristics and components that are excluded from PA.
 5 Some of these excluded characteristics, however, can indirectly influence performance. For
 6 example, the ability of nonferrous metals to bind organic ligands prevents those ligands from
 7 increasing +IV actinide solubility, which is considered in PA analyses. The waste characteristics
 8 and components listed in Table TRU WASTE-6 are identical to those listed in Appendix WCA,
 9 Table WCA-4, in the CCA. None of the inventory changes described in Appendix DATA,
 10 Attachment F led to an alternate conclusion regarding the relative importance of individual waste
 11 characteristics and components for PA.

Table TRU WASTE-6. Waste Characteristics and Components Not Used in Performance Assessment

Characteristic	Component	Effect on Performance
Cellulosic Materials Radiolysis	Radionuclides	Negligible Effect On Total CO ₂
Explosivity	Other Organic Compounds	None
Brine Radiolysis	Radionuclides	Negligible Effect On Actinide Valence
Galvanic Action	Nonferrous Metals	Negligible
Complexation With Actinides ¹	Soil And Humic Material ¹	Actinide Mobility
Buffering Action ¹	Cement ¹	Negligible: Reacts With CO ₂ And MgCl ₂
Heat Of Solution	Cement	Negligible
Ca ²⁺ Binding To Organic Ligands	Cement	Negligible Compared To Other Metals
Binding To Organic Ligands ¹	Ferrous Metals ¹	Can Reduce Actinide Mobility
Buffering Action ¹	Ferrous Metals ¹	Actinide Mobility
Galvanic Action	Ferrous Metals	Negligible
Binding To Organic Ligands ¹	Ferrous Alloy Components ¹	Can Reduce Actinide Mobility
Redox Reactions	Nonferrous Metals	Negligible Compared To Iron
Binding To Organic Ligands ¹	Nonferrous Metals ¹	Can Reduce Actinide Mobility
Complexation With Actinides	Organic Ligands	Negligible
Gas Generation	Al And Other Nonferrous Metals	Negligible Relative To Steels
Microbial Nutrients, CO ₂ Generation	Phosphates	Negligible Because MgO Reacts With CO ₂
Microbial Nutrients: CH ₄ Generation	Phosphates ¹	Negligible
Heat Generation	RH-TRU	Negligible
Electrochemical Processes	Sulfate, Nitrate, Phosphate	Negligible

¹ Waste characteristics and components that influence performance indirectly by influencing components and characteristics listed in Table TRU WASTE-5.

Each waste characteristic shown in Tables TRU WASTE-4 and TRU WASTE-5 is reflected in one or more parameters that are used in PA. The PA parameters are compiled in the Performance Assessment Parameter Database (PAPDB) (presented in Appendix PA, Attachment PAR).

TRU WASTE-2.2.2 Relationship Between Inventory Data and Performance Assessment

Appendix DATA, Attachment F provides both WIPP-level data and waste stream-level data on the radionuclide inventory for the WIPP. Performance assessment models generally use the WIPP-level data, normalized to a base year (2001) and scaled up to the full WIPP capacity. The one exception to this approach is the cuttings/caving model, which uses scaled waste stream level data to capture potential variations in the CH-TRU waste.

1 The relationship between Appendix DATA, Attachment F data and PA is shown in Figure TRU
2 WASTE-3. As Figure TRU WASTE-3 shows, the waste stream level data are used only in
3 modeling direct release by cuttings and cavings (see Appendix PA for additional information).
4 This direct release scenario includes the probability of penetrating each of the 693 CH-TRU
5 waste streams or a single RH-TRU waste stream that represents all of the 86 RH-TRU waste
6 streams, as discussed in Section 6.4.12.4 and in Appendix PA.

7 This approach for cuttings and cavings releases represents the potential variations in the CH-
8 TRU waste. This approach is necessary because the size scale for cuttings and cavings is on the
9 order of the drill bit diameter, which is less than the diameter of a 55-gallon drum (8- to 12 in
10 versus 24 in). A cuttings and cavings intrusion would, therefore, extract waste from three
11 specific drums (assuming that drums are stacked three high in the disposal rooms), rather than
12 sampling from a larger volume of waste.

13 In contrast, scenarios in which radionuclides would be released in brine, either directly to the
14 surface or through the Culebra reservoir, assume that the mobility of radionuclides in brine
15 results in an essentially homogeneous mixture of radionuclides. Brine flow would contact a
16 much larger portion of the waste than the direct release of cuttings and cavings. For brine-
17 related release pathways, the total radionuclide inventory is more applicable than the inventory
18 of a particular waste stream. Performance assessment, therefore, uses the average (WIPP-level)
19 inventory from all TRU waste sites, as shown in Figure TRU WASTE-3. In a similar fashion,
20 spall releases use WIPP-level data because this mechanism is assumed to release waste from a
21 volume larger than several drums, averaging out variations in waste streams.

22 Decay of radionuclides in the TRU waste will produce some radioactive daughter products that
23 must be accounted for in the waste inventory. Therefore, to provide a current inventory estimate
24 for the CRA-2004, all radionuclide values reported in Appendix DATA, Attachment F are
25 decayed to the end of 2001. The PA calculations begin at the time of closure of the WIPP
26 facility. Therefore, PA calculations further decay the inventory to the end of year 2033.

27 **TRU WASTE-2.3 Components That Affect Performance: Curie Content**

28 The radioactivity of a particular radionuclide, often called the activity, is significant to two
29 different aspects of compliance: (1) inclusion in the waste unit factor, which is the normalization
30 factor for the release limits given in Table TRU WASTE-7, and (2) inclusion in the source term
31 for the compliance demonstration. The waste unit factor is based only on TRU wastes that are
32 alpha (α)-emitters with a half-life greater than 20 years, while the complementary cumulative
33 distribution function (CCDF) is based on the full inventory of all radionuclides in the repository.
34 This section, therefore, includes two subsections: TRU WASTE-2.3.1, components relevant to
35 inclusion in the waste unit factor; and TRU WASTE-2.3.2, components relevant to inclusion in
36 CCDFs for each applicable scenario.

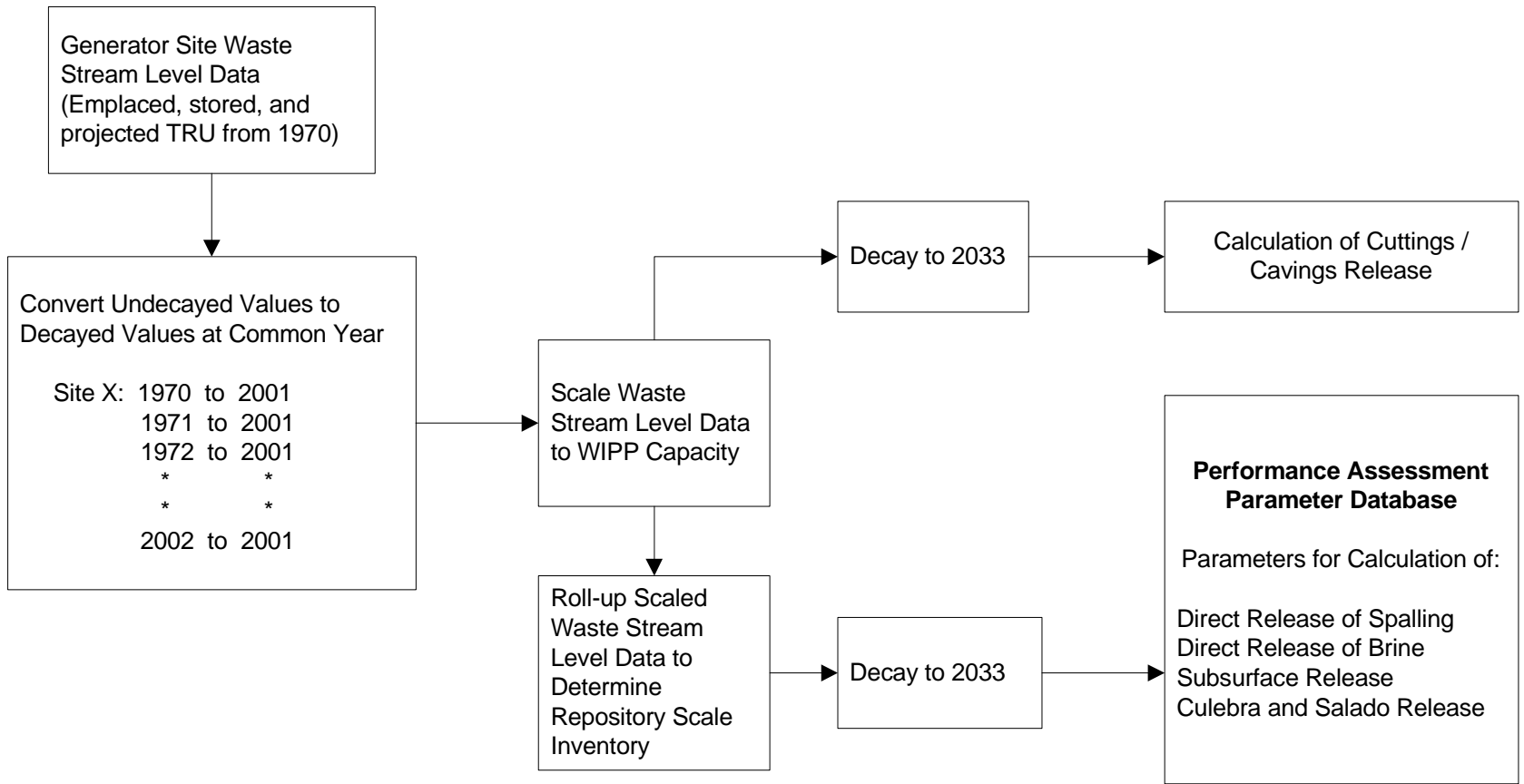


Figure TRU WASTE-3. Flow Chart for Inventory Input into Performance Assessment Waste Components, the Associated Waste Characteristics, and a Performance Assessment Code Related to Each Characteristic

Table TRU WASTE-7. EPA Release Limits and Normalized Release Limits for Radionuclides

Radionuclide	Release Limit per Million Ci of TRU Radionuclides ¹ (Ci)	Release Limit for the WIPP Normalized by Total from Table TRU WASTE-8 (Ci)
Americium: ²⁴¹ Am or ²⁴³ Am	100	248
Carbon: ¹⁴ C	100	248
Cesium: ¹³⁵ Cs, or ¹³⁷ Cm	1,000	2,480
Iodine: ¹²⁹ I	100	248
Neptunium: ²³⁷ Np	100	248
Plutonium: ²³⁸ Pu, ²³⁹ Pu, ²⁴⁰ Pu, ²⁴² Pu	100	248
Radium: ²²⁶ Ra	100	248
Strontium: ⁹⁰ Sr	1,000	2,480
Technetium: ⁹⁹ Tc	10,000	24,800
Thorium: ²³⁰ Th or ²³² Th	10	24.8
Tin: ¹²⁶ Sn	1,000	2,480
Uranium: ²³³ U, ²³⁴ U, ²³⁵ U, ²³⁶ U, or ²³⁸ U	100	248
Any other α -emitting radionuclide with a half-life greater than 20 years	100	248
Any other radionuclide with a half-life greater than 20 years that does not emit α particles	1,000	2,480

¹ In Appendix A of 40 CFR Part 191, this column is in terms of metric tons heavy metal, and the equivalence to Ci of TRU is presented in Footnote e to the table.

TRU WASTE-2.3.1 Radioactivity Included in the Waste Unit Factor

The WUF is the number of millions of curies (Ci) of α -emitting TRU radionuclides with half-lives longer than 20 years (40 CFR Part 191, Appendix A), based on the TRU waste inventory to be disposed. In the WIPP, 2.48×10^6 Ci (see Table TRU WASTE-8) of TRU waste are estimated to be in the repository at closure, so the WUF is 2.48. In CCA Section 4.2.1, the DOE reported the activity of TRU isotopes that contribute to the WUF at closure to be¹ 3.44×10^6 Ci, with a WUF of 3.44. The current WUF (now 2.48 at closure) reflects the updated TRU waste inventory as described in Section TRU WASTE-2.1.2 (greater detail is available in Appendix DATA, Attachment F).

The number of EPA units of a radionuclide is the activity (in Ci) of the radionuclide divided by the release limit for that radionuclide. EPA units are important because the containment requirement for the repository is expressed in EPA units. Section TRU WASTE-2.3.1 discusses current EPA units in more detail.

¹ The value for the WUF in the CCA was inconsistently described; Chapter 4, Section 4.2.1 correctly listed the WUF that was used in the CCA PA as 3.44. CCA Appendix WCA Sections 1.4.2 and WCA Attachment WCA 8.1 incorrectly stated the 1995 decayed value of 4.07 was used in the CCA PA, however the preface to Attachment WCA.8.2 identified and corrected the error. During the EPA's review of the CCA, EPA required DOE to recalculate a new WUF of 3.59 that was ultimately included in the EPA's PAVT (EPA 1998). After the certification, the DOE incorporated the PAVT WUF value of 3.59 in the compliance baseline through an EPA approved change request (EPA 2002).

1 **Table TRU WASTE-8. Radionuclides That Contribute to the Waste Unit Factor**

Nuclide	Half-Life (years)	Inventory at Closure (Ci)	Percent of Waste Unit Factor
²⁴¹ Am	4.33×10^2	4.58×10^5	1.82×10^1
^{242m} Am	1.41×10^2	2.11×10^{-1}	8.48×10^{-6}
²⁴³ Am	7.37×10^3	2.17×10^1	8.63×10^{-4}
²⁴⁹ Cf	3.51×10^2	7.24×10^{-2}	2.88×10^{-6}
²⁵¹ Cf	9.00×10^2	5.10×10^{-4}	2.03×10^{-8}
²⁴³ Cm	2.91×10^1	4.07×10^{-1}	1.62×10^{-5}
²⁴⁵ Cm	8.50×10^3	1.92×10^{-2}	7.62×10^{-7}
²⁴⁶ Cm	4.76×10^3	2.22×10^0	8.80×10^{-5}
²⁴⁷ Cm	1.56×10^7	9.45×10^0	3.75×10^{-4}
²⁴⁸ Cm	3.48×10^5	9.32×10^{-2}	3.70×10^{-6}
²³⁷ Np	2.14×10^6	1.01×10^1	4.00×10^{-4}
²³⁸ Pu	8.77×10^1	1.25×10^6	4.98×10^1
²³⁹ Pu	2.41×10^4	6.65×10^5	2.64×10^1
²⁴⁰ Pu	6.56×10^3	1.08×10^5	4.30×10^0
²⁴² Pu	3.75×10^5	2.71×10^1	1.08×10^{-3}
²⁴⁴ Pu	8.00×10^7	1.10×10^{-3}	4.38×10^{-8}
TOTAL		2.48×10^6	-

Source: Leigh 2003a

2 As an example, using EPA units, the ²³⁹Pu inventory at closure would be 6.65×10^5 Ci (Table
 3 TRU WASTE-8), and the release limit for ²³⁹Pu would be 248 Ci, so the number of EPA units is
 4 calculated as:

5
$$\frac{6.65 \times 10^5 \text{ Ci}}{248 \text{ Ci}} = 2.68 \times 10^3 \text{ EPA units.} \tag{1}$$

6

7 The release limit for ²³⁹Pu is given by the waste unit factor (2.48) multiplied by the release limit
 8 per million Ci of TRU. The release limit per million Ci is given in Table TRU WASTE-7, which
 9 is a copy of Table 1 in Appendix A, 40 CFR Part 191. The value for ²³⁹Pu is 100 Ci, giving a
 10 release limit of 248 Ci. The calculation of WUF, EPA units, and release limits uses the method
 11 established for the CCA (described above).

12 With a mix of radionuclides, each radionuclide is normalized with respect to its release limit, and
 13 the sum of all releases must have

- 14
- less than one chance in 10 of exceeding the release limit, and
 - less than one chance in 1,000 of exceeding ten times the release limit.
- 15

1 The sum of releases in EPA units is expressed by

$$2 \quad R_j = \frac{1}{f_w} \left[\frac{Q_{1j}}{L_1} + \frac{Q_{2j}}{L_2} + \dots \right] = \sum_{i=1}^{nR} \frac{Q_{ij}}{f_w L_i} \leq \left\{ \begin{array}{l} \mathbf{1 \text{ with a probability of } 0.1} \\ \mathbf{10 \text{ with a probability of } 0.001} \end{array} \right\} \quad (2)$$

3 where

4 R_j is the total release in EPA units under scenario j ,

5 f_w is the WUF,

6 Q_{ij} is the cumulative release for radionuclide i under scenario j ,

7 L_i is the EPA release limit for radionuclide i , and

8 nR is the number of radionuclides contributing to the release.

9 The regulatory time period over which these releases are summed is 10,000 years. A brief
10 explanation of these release limits is given in Sanchez (1996), and a comprehensive discussion of
11 the background for these limits is provided in EPA (1985).

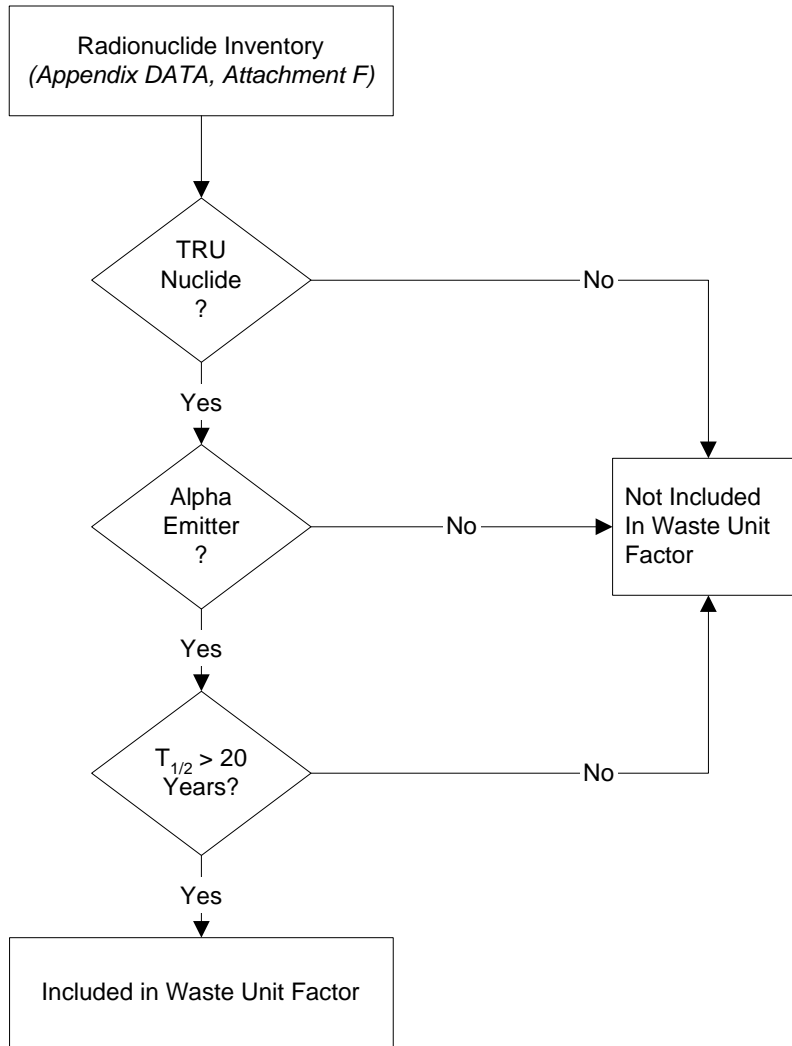
12 Figure TRU WASTE-4 is a flow diagram for the selection of those radionuclides in the inventory
13 that contribute to the WUF. As noted above, not all radionuclides are included in this factor.
14 For example, ^{90}Sr is excluded because it is not a TRU radionuclide, and is not an α -emitter.
15 Even uranium is excluded because it is not a TRU radionuclide, defined as elements with atomic
16 numbers greater than 92.

17 The radionuclides that are included in the WUF are listed in Table TRU WASTE-8. As noted in
18 the table, the relevant inventory at closure is 2.48×10^6 Ci, resulting in a WUF of 2.48. This
19 analysis was performed using data from Appendix DATA, Attachment F.

20 It is worthwhile to note that the inventory in Table TRU WASTE-8 is dominated by americium
21 and plutonium, the same elements that dominated the inventory for the CCA. More specifically,
22 the radionuclides ^{238}Pu , ^{239}Pu , ^{240}Pu , and ^{241}Am capture 99.9 percent of the WUF. The combined
23 activity at emplacement of ^{241}Am , ^{238}Pu , ^{239}Pu , and ^{240}Pu is orders of magnitude greater than the
24 combined activity of the remaining radionuclides.

25 ***TRU WASTE-2.3.2 Radioactivity Included in the Source Term for Performance Assessment***

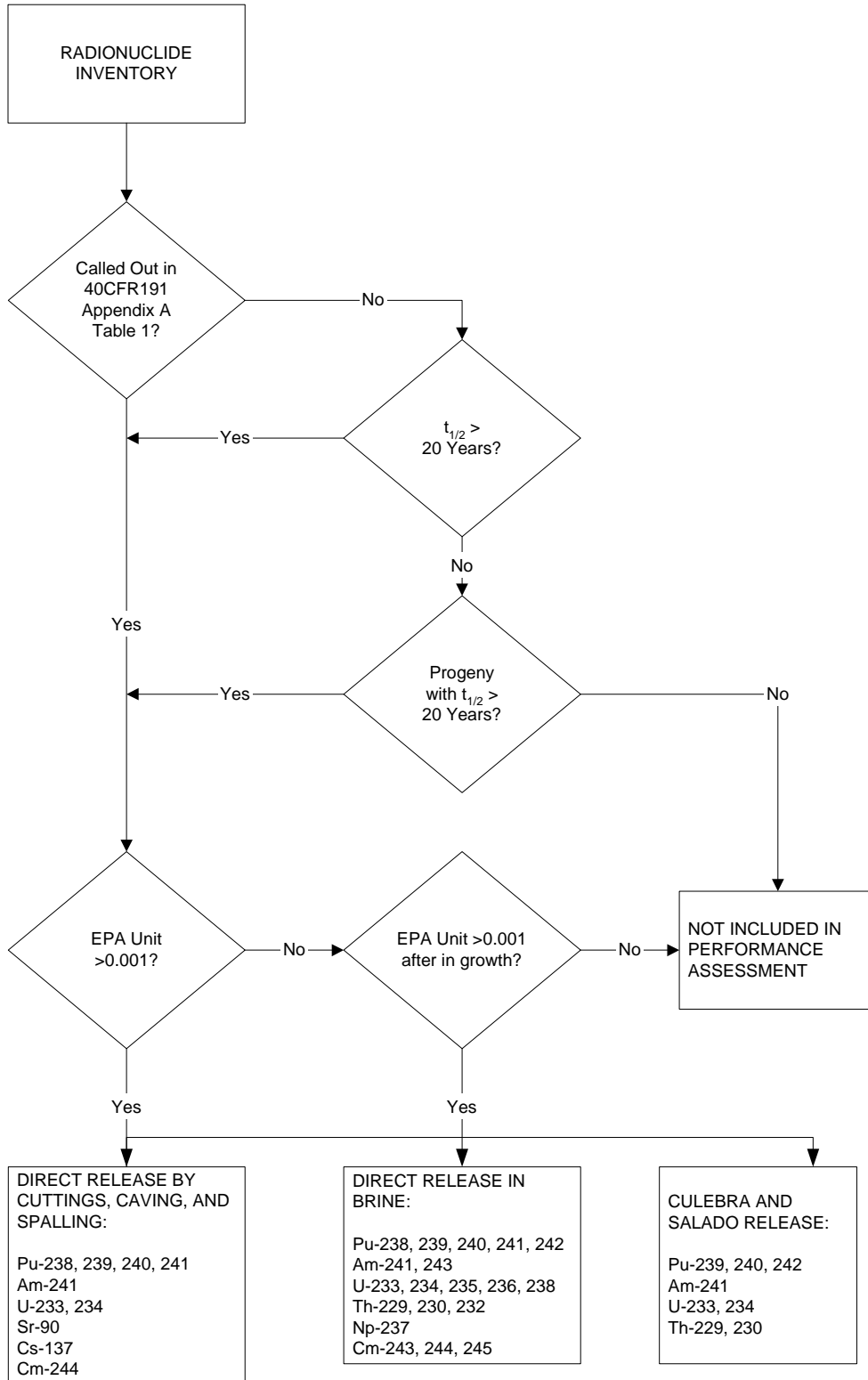
26 Unlike the WUF, all reported radionuclides are included in a demonstration of compliance and
27 must therefore be considered for inclusion in the source term for PA. A comprehensive list of
28 radionuclides in the waste is in Appendix DATA, Attachment F, which provides the inventory
29 basis for the CRA-2004. Many of these radionuclides are present in such small quantities that
30 their impact on long-term performance is negligible. That is, their total combined initial
31 inventory in EPA units is much less than one percent so they will have negligible impact on
32 compliance.



1
2 **Figure TRU WASTE-4. Flow Diagram for Including Radionuclides in the Waste Unit**
3 **Factor**

4 Two different release pathways are used in PA: (1) direct releases comprised of (a) material
5 brought to the surface by cuttings, cavings, spalling, and (b) brine under pressure that flows to
6 the surface during a drilling intrusion through the repository; and (2) releases to the accessible
7 environment in brine that moves through the subsurface, primarily the Culebra aquifer. Note that
8 the time scales for these two releases are quite different. The direct release during drilling events
9 (Item 1) occurs within a few days. The flow and transport of radionuclides through the Culebra
10 (Item 2) will require hundreds to thousands of years.

11 Different radionuclides are used for these pathways because of the time-scale differences and
12 different release media (solid particles containing radionuclides or brine containing
13 radionuclides) as well as the computational efficiency of each computer code used in the PA
14 calculations. Figure TRU WASTE-5 is a flow diagram for selecting radionuclides for different
15 release mechanisms according to the criteria of Table TRU WASTE-7. The result of applying
16 these criteria to the radionuclides in Appendix DATA, Attachment F is shown in



1
2
3
4

Figure TRU WASTE-5. Flow Diagram for Selecting Radionuclides for the Release Pathways Conceptualized by Performance Assessment (The top part of the diagram describes the criteria for selecting radionuclides in Table TRU WASTE-9)

1
2

Table TRU WASTE-9. Radionuclides Included in the Performance Assessment Source Term

Radionuclide	Current Inventory Values			Release Calculations (1)			
	Inventory at Closure (Ci)	EPA Units		Cuttings, Cavings, & Spall Release	Direct Brine Release	Salado Release	Culebra Release
		At Closure	At 10,000 years				
²³⁸ Pu	1.25 × 10 ⁶	5.04 × 10 ³	2.61 × 10 ⁻²³	×	×	(2)	(2)
²³⁹ Pu	6.65 × 10 ⁵	2.68 × 10 ³	2.01 × 10 ³	×	×	×	×
²⁴¹ Am	4.58 × 10 ⁵	1.84 × 10 ³	2.48 × 10 ⁻⁴	×	×	×	×
²⁴⁰ Pu	1.08 × 10 ⁵	4.36 × 10 ²	1.51 × 10 ²	×	×	c	c
¹³⁷ Cs	1.79 × 10 ⁵	7.19 × 10 ¹	0.00 × 10 ⁰	×	--	--	--
⁹⁰ Sr	1.42 × 10 ⁵	5.71 × 10 ¹	0.00 × 10 ⁰	×	--	--	--
²³³ U	1.27 × 10 ³	5.12 × 10 ⁰	4.91 × 10 ⁰	×	×	c	c
²²⁹ Th	5.39 × 10 ⁰	2.17 × 10 ⁻²	3.04 × 10 ⁰	--	×	c	c
²³⁴ U	3.19 × 10 ²	1.28 × 10 ⁰	3.03 × 10 ⁰	×	×	×	×
²³⁰ Th	1.76 × 10 ⁻¹	7.07 × 10 ⁻³	2.64 × 10 ⁰	--	×	×	×
²³⁸ U	1.54 × 10 ²	6.21 × 10 ⁻¹	6.21 × 10 ⁻¹	--	×	--	--
²³⁷ Np	1.01 × 10 ¹	4.06 × 10 ⁻²	4.27 × 10 ⁻¹	--	×	--	--
²³² Th	6.83 × 10 ⁰	2.75 × 10 ⁻¹	2.75 × 10 ⁻¹	--	×	--	--
²²⁶ Ra	6.28 × 10 ⁰	2.53 × 10 ⁻²	2.07 × 10 ⁻¹	--	--	--	--
²¹⁰ Pb	4.94 × 10 ⁰	1.99 × 10 ⁻²	2.07 × 10 ⁻¹	--	×	--	--
²⁴² Pu	2.71 × 10 ¹	1.09 × 10 ⁻¹	1.07 × 10 ⁻¹	--	×	c	c
²⁴³ Am	2.17 × 10 ¹	8.75 × 10 ⁻²	5.74 × 10 ⁻²	--	×	--	--
²³⁶ U	1.65 × 10 ⁰	6.66 × 10 ⁻³	8.62 × 10 ⁻²	--	×	--	--
²³⁵ U	2.28 × 10 ⁰	9.18 × 10 ⁻³	3.21 × 10 ⁻²	--	×	--	--
¹⁴ C	3.25 × 10 ⁰	1.31 × 10 ⁻²	3.90 × 10 ⁻³	--	--	--	--
²³² U	3.07 × 10 ⁰	1.23 × 10 ⁻²	0.00 × 10 ⁰	--	--	--	--
²²⁷ Ac	9.57 × 10 ⁻¹	3.85 × 10 ⁻³	8.06 × 10 ⁻³	--	--	--	--
²³¹ Pa	1.21 × 10 ⁰	4.88 × 10 ⁻³	8.06 × 10 ⁻³	--	--	--	--
²⁴³ Cm	4.07 × 10 ⁻¹	1.64 × 10 ⁻³	0.00 × 10 ⁰	--	×	--	--
²⁴⁸ Cm	9.32 × 10 ⁻²	3.75 × 10 ⁻⁴	3.68 × 10 ⁻⁴	--	×	--	--
²⁴⁵ Cm	1.92 × 10 ⁻²	7.72 × 10 ⁻⁵	3.97 × 10 ⁻⁵	--	×	--	--
²⁴⁴ Pu	1.10 × 10 ⁻³	4.44 × 10 ⁻⁶	4.47 × 10 ⁻⁶	--	×	--	--
²⁴⁴ Cm	2.51 × 10 ³	(3)	(3)	×	×	--	--
²⁴¹ Pu	5.38 × 10 ⁵	(3)	(3)	×	×	--	--
Percent of EPA Units at closure represented by nuclides in source term				99.98%	98.71%	48.95%	48.95%
Percent of EPA Units at 10,000 years represented by nuclides				99.65%	99.99%	99.92%	99.92%

Source: Leigh 2003b

- (1) See Section 6.3 for a discussion of scenarios analyzed by PA and the release pathways.
- (2) ²³⁸Pu was included in the Salado transport calculations but the release to the Culebra was too low to merit calculation of its transport within the Culebra. The EPA unit percent total at closure increases to 98.71% with ²³⁸Pu added; the percent at 10,000 years is unaffected.

²⁴¹Pu and ²⁴⁴Cu are not regulated by 40 CFR Part 191, but are included because their daughters, ²⁴¹Am and ²⁴⁰Pu respectively, are significant to performance.

× indicates an isotope included in calculation

c indicates isotopes that are combined for transport with isotopes having similar characteristics

1
2 Table TRU WASTE-9. The inventory analysis that follows Figure TRU WASTE-5 is
3 documented in Leigh (2003b). Table TRU WASTE-9 also lists the radionuclides used for
4 specific release mechanisms. The EPA unit at 10,000 years (the end of the regulatory period) is
5 also shown in Table TRU WASTE-9, because some nuclides experience considerable ingrowth,
6 but not enough to affect the domination by the most prevalent radionuclides ^{239}Pu and ^{240}Pu . The
7 ^{241}Am component is also important for the first 3,000 years after closure.

8 TRU WASTE-2.3.2.1 Radionuclides Included in Direct Releases by Cuttings, Cavings, and
9 Spalling

10 The 10 isotopes listed in the column headed "Cuttings/Cavings/Spall Release" in Table TRU
11 WASTE-9 are used to model direct release by cuttings, cavings, or spalling. Release is assumed
12 to occur when containers of CH-TRU or RH-TRU waste are breached during a borehole
13 intrusion. The amount of radionuclides in the source term is estimated from the inventory per
14 drum of the waste stream penetrated, including decay and ingrowth. Details of the EPA unit
15 distribution in the waste streams are provided in Fox (2003). The direct release scenario is
16 discussed in greater detail in Section 6.4.12.4.

17 Eight of the listed isotopes comprise more than 99.9 percent of the EPA units for the entire
18 regulatory period and are identified in Leigh (2003b) as important radionuclides for direct
19 release. The other two are included because they are parent nuclides of significant daughters.
20 Inclusion of 99 percent or more of the EPA unit provides an accurate representation of the source
21 term, while maintaining efficiency in computation by limiting the total number of isotopes to 10.
22 The addition of the many radionuclides that make up the final 0.1 percent does not provide
23 additional benefit in understanding the long-term behavior of the repository (see Leigh 2003b).

24 TRU WASTE-2.3.2.2 Radionuclides Included in Direct Releases of Brine to the Surface

25 Direct release of brine to the surface can carry radionuclides that are dissolved in the brine or
26 sorbed on colloidal particles.

27 The radionuclides released in direct release of brine to the surface include several isotopes that
28 comprise negligible fractions of the total EPA unit, but must be included in the source term
29 because of their influence on the total quantity of dissolved radionuclides. This influence occurs
30 because the isotopes of a radionuclide will dissolve based on mass ratio, rather than the activity
31 ratio, in which they are present in the waste. That is, if 90 percent of the mass of uranium in the
32 waste is ^{238}U (for example), 90 percent of the dissolved uranium in moles/liter will be ^{238}U , even
33 though 90 percent of the radioactivity will not be from ^{238}U .

34 The EPA units of ^{90}Sr and ^{137}Cs at closure are large enough that an explanation is needed for not
35 including them in the source term for direct release of brine. Although the EPA units of ^{90}Sr and
36 ^{137}Cs are initially large (57 for ^{90}Sr and 72 for ^{137}Cs), rapid decay from a short half-life (about 30
37 years) results in negligible impact on the PA for these two isotopes. The lack of impact on
38 compliance is explained below.

39 The ^{90}Sr and ^{137}Cs components decay by about 90 percent during the first 100 years after closure,
40 when borehole intrusions are excluded due to the active institutional controls that will be

1 implemented following WIPP closure. During this time period, the EPA unit of ^{137}Cs decays
2 from 72 down to 7.1 for the whole repository, while ^{90}Sr decays from 57 to 5.3. At 200 years,
3 the EPA unit for both ^{137}Cs and ^{90}Sr is below 1.0, again for the whole repository.

4 In addition to the rapid decay, the results of the PA show that were an individual borehole
5 intrusion to occur at 100 years, it would release about six EPA units (5.5 units, see Appendix
6 PA), which is much less than the total inventory. Even at 350 years, when either isotope decays
7 down to 0.03 percent of the initial inventory, the maximum volume of brine release would be
8 only 0.01 m^3 . In summary, the rapid decay of ^{137}Cs and ^{90}Sr and the negligible volumes of brine
9 release at early times provide the basis for excluding these isotopes from the inventory.

10 The ^{14}C component is not included in this (or any) source term. Any ^{14}C transported out of the
11 repository will be diluted by the large excess of nonradioactive carbon. This was demonstrated
12 in Wang (1996a) in which there were 0.2 moles of ^{14}C out of 3×10^8 moles of carbon in the
13 cellulosic materials, or one part in 100 million. Although the ^{14}C inventory has been updated,
14 the ratio of ^{14}C to nonradioactive carbon remains the same.

15 TRU WASTE-2.3.2.3 Radionuclides Included in Releases to the Culebra Aquifer

16 Release of brine from the repository to the Culebra also potentially carries dissolved and
17 colloidal radionuclides. The nine radionuclides in the source term for Culebra release include
18 those that dominate the EPA unit for all but the earliest part of the regulatory period. Other less
19 prevalent radionuclides are excluded because they would comprise a negligible fraction of the
20 EPA unit or because transport through the Culebra is sufficiently slow that shorter-lived
21 radionuclides would decay to negligible amounts before reaching the accessible environment.
22 The selection of the nine radionuclides is discussed in Leigh (2003b).

23 Of the nine radionuclides, only ^{239}Pu , ^{241}Am , ^{234}U , and ^{230}Th are transported separately in PA.
24 Isotopes of the same element will be transported together, unless their half-lives differ greatly.
25 The movement of most of the radionuclides can be calculated indirectly. This concept was
26 presented in detail in Garner (1996):

- 27 • The ^{233}U component can be combined with ^{234}U for transport because their half-lives are
28 similar.
- 29 • Similarly, ^{229}Th can be combined with ^{230}Th , because they will be in a fixed ratio to each
30 other. The ^{232}Th component can be dropped because it is a constant small fraction of the
31 EPA unit throughout the regulatory period.
- 32 • The ^{240}Pu and ^{242}Pu components can be combined with ^{239}Pu ; their long half-lives also
33 indicate a fixed ratio between them.
- 34 • The ^{238}Pu component will have decayed to about 0.5 percent of its initial inventory after
35 700 years, and its contribution to the EPA unit will be negligible because travel time in
36 the Culebra is much greater than 700 years.

37 The ^{239}Pu and ^{240}Pu components dominate the EPA limit during the regulatory period, and ^{241}Am
38 is also a factor for the first 3,000 years. Toward the end of the regulatory period, ^{230}Th has

1 grown by about 2.5 orders of magnitude, ^{229}Th by about 1.5 orders of magnitude, and ^{234}U by a
2 factor of three, but all are still small fractions of the EPA unit. The ^{226}Ra component grows
3 during the regulatory period, but even at 10,000 years would comprise a very small fraction of
4 the EPA limit.

5 Calculation of radionuclide inventories for this transport mechanism is presented in Leigh
6 (2003c.)

7 TRU WASTE-2.3.2.4 Radionuclides Included in Releases Through the Salado

8 In the PA results (Appendix PA), there is one vector in which brine is released through the
9 Salado to the accessible environment. As a result, the radionuclides that could potentially
10 contribute to releases via this pathway are considered.

11 Release of brine from the repository through the Salado (either to the Culebra or to the accessible
12 boundary) can also potentially carry dissolved and colloidal radionuclides. The nine
13 radionuclides in the source term for Salado release include those that dominate the EPA unit for
14 all but the earliest part of the regulatory period. Other less prevalent radionuclides are excluded,
15 because they would comprise a negligible fraction of the EPA unit or because transport through
16 the Salado is sufficiently slow that shorter-lived radionuclides would decay to negligible
17 amounts before reaching the accessible environment. The selection of the nine radionuclides is
18 discussed in Leigh (2003b.)

19 TRU WASTE-2.3.2.5 Radionuclides Excluded From Source Terms

20 A large number of radionuclides were not included in any source term because they did not
21 survive the screening process outlined in Figure TRU WASTE-5. Table TRU WASTE-10 lists
22 those excluded radionuclides that have not already been discussed, and indicates (marked with an
23 “x” in Table TRU WASTE-10) the reason for their exclusion.

24 **TRU WASTE-2.4 Radionuclide Characteristics: Solubility and Colloid Formation**

25 The major characteristics of the radionuclides that are expected to affect disposal system
26 performance are (1) solubility and (2) the tendency to form or sorb to colloidal particles. Except
27 for direct release from drilling (cutting) and caving, in which particles containing radionuclides
28 will be released with circulation of drilling mud, radionuclides are mobilized for transport from
29 the repository either in brine or as colloidal particles transported by brine. Gas-phase transport is
30 not expected to occur (see Appendix PA, Attachment SCR).

31 All isotopes of a particular radioactive element exhibit essentially identical characteristics of
32 solubility, colloid formation, and sorption.

1

Table TRU WASTE-10. Radionuclides Excluded From All Source Terms

Radionuclide	Reason for Exclusion ³		
	Short Half-life and Progeny with Short Half-life ¹	Small EPA Unit	Negligible ² Ingrowth
²²⁵ Ac	×	NA	NA
²²⁷ Ac	×	NA	NA
²²⁸ Ac	×	NA	NA
^{109m} Ag	×	NA	NA
¹¹⁰ Ag	×	NA	NA
^{110m} Ag	×	NA	NA
²⁴² Am	×	NA	NA
^{242m} Am	NA	×	×
²⁴⁵ Am	×	NA	NA
²¹⁷ At	×	NA	NA
^{137m} Ba	×	NA	NA
²¹⁰ Bi	×	NA	NA
²¹¹ Bi	×	NA	NA
²¹² Bi	×	NA	NA
²¹³ Bi	×	NA	NA
²¹⁴ Bi	×	NA	NA
²⁴⁹ Bk	×	NA	NA
²⁵⁰ Bk	×	NA	NA
¹⁴ C	NA	×	NA
¹⁰⁹ Cd	×	NA	NA
^{113m} Cd	×	NA	NA
¹⁴¹ Ce	×	NA	NA
¹⁴⁴ Ce	×	NA	NA
²⁴⁹ Cf	NA	×	×
²⁵⁰ Cf	×	NA	NA
²⁵¹ Cf	NA	×	NA
²⁴² Cm	×	NA	NA
²⁴⁶ Cm	NA	×	×
²⁴⁷ Cm	NA	NA	×
²⁵⁰ Cm	NA	NA	×
⁶⁰ Co	NA	×	NA
¹³⁴ Cs	×	NA	NA

2

**Table TRU WASTE-10. Radionuclides Excluded From All Source Terms —
Continued**

Radionuclide	Reason for Exclusion ³		
	Short Half-life and Progeny with Short Half-life ¹	Small EPA Unit	Negligible ² Ingrowth
¹³⁵ Cs	NA	×	NA
¹⁵² Eu	×	NA	NA
¹⁵⁴ Eu	×	NA	NA
¹⁵⁵ Eu	×	NA	NA
⁵⁵ Fe	×	NA	NA
²²¹ Fr	×	NA	NA
²²³ Fr	×	NA	NA
¹⁵² Gd	NA	×	NA
³ H	×	×	NA
¹²⁹ I	NA	×	×
⁸⁵ Kr	×	NA	NA
⁵⁴ Mn	×	NA	NA
²² Na	×	NA	NA
^{93m} Nb	×	NA	NA
⁹⁵ Nb	×	NA	NA
^{95m} Nb	×	NA	NA
¹⁴⁴ Nd	NA	NA	×
⁵⁹ Ni	NA	×	×
⁶³ Ni	NA	NA	×
²³⁸ Np	×	NA	NA
²³⁹ Np	×	NA	NA
^{240m} Np	×	NA	NA
²³³ Pa	×	NA	NA
²³⁴ Pa	×	NA	NA
^{234m} Pa	×	NA	NA
²⁰⁹ Pb	×	NA	NA
²¹¹ Pb	×	NA	NA
²¹² Pb	×	NA	NA
²¹⁴ Pb	×	NA	NA
¹⁰⁷ Pd	NA	×	NA
²¹⁰ Po	×	NA	NA
²¹¹ Po	×	NA	NA
²¹² Po	×	NA	NA
²¹³ Po	×	NA	NA

**Table TRU WASTE-10. Radionuclides Excluded From All Source Terms —
Continued**

Radionuclide	Reason for Exclusion ³		
	Short Half-life and Progeny with Short Half-life ¹	Small EPA Unit	Negligible ² Ingrowth
²¹⁴ Po	×	NA	NA
²¹⁵ Po	×	NA	NA
²¹⁶ Po	×	NA	NA
²¹⁸ Po	×	NA	NA
¹⁴⁴ Pr	×	NA	NA
²³⁶ Pu	×	NA	NA
²⁴³ Pu	×	×	NA
²²³ Ra	×	NA	NA
²²⁴ Ra	×	NA	NA
²²⁵ Ra	×	NA	NA
¹⁰⁶ Rh	×	NA	NA
²¹⁹ Rn	×	NA	NA
²²⁰ Rn	×	NA	NA
²²² Rn	×	NA	NA
¹⁰⁶ Ru	×	NA	NA
¹²⁵ Sb	×	NA	NA
¹²⁶ Sb	×	NA	NA
^{126m} Sb	×	NA	NA
⁷⁹ Se	NA	×	×
¹⁴⁷ Sm	NA	×	NA
¹⁴⁸ Sm	NA	NA	×
¹⁵¹ Sm	NA	NA	×
^{121m} Sn	NA	×	NA
¹²⁶ Sn	NA	×	NA
⁹⁹ Tc	NA	×	×
¹²³ Te	NA	NA	×
^{123m} Te	×	NA	NA
^{125m} Te	×	NA	NA
²²⁷ Th	×	NA	NA
²²⁸ Th	×	NA	NA
²³¹ Th	×	NA	NA
²³⁴ Th	×	NA	NA
²⁰⁷ Tl	×	×	NA
²⁰⁸ Tl	×	×	NA

**Table TRU WASTE-10. Radionuclides Excluded From All Source Terms —
Continued**

Radionuclide	Reason for Exclusion ³		
	Short Half-life and Progeny with Short Half-life ¹	Small EPA Unit	Negligible ² Ingrowth
²⁰⁹ Tl	×	NA	NA
²³² U	NA	×	×
²³⁷ U	×	NA	NA
²⁴⁰ U	×	NA	NA
⁹⁰ Y	×	NA	NA
⁹¹ Y	×	NA	NA
⁶⁵ Zn	×	NA	NA
⁹³ Zr	NA	×	×
⁹⁵ Zr	×	NA	NA

¹ "Short" half-life means $t_{1/2} < 20$ years. Radionuclides with $t_{1/2} < 20$ years are not regulated by 40 CFR Part 191 Subparts (b) and (c).

² Negligible ingrowth includes ingrowth of the progeny that are radionuclides already predominant in the inventory.

³ NA indicates that the column heading does not apply to the particular isotope.

1 Solubility and colloid formation are discussed for thorium, uranium, neptunium, plutonium, and
2 americium. The experimental determination and modeling of solubility and colloid formation,
3 and the manner in which they are taken into account by PA, are discussed in detail in Appendix
4 PA. Cesium and strontium are assumed to be extremely soluble and their concentrations will be
5 limited by their inventories (see Appendix WCA, Section WCA.3.2.2, in the CCA). Thus, the
6 two elements are not considered in this section. Radium is excluded from the source term
7 because of its short half-life.

8 Actinide mobility depends on the particular chemical environment (brine pH, fugacity of CO₂,
9 redox potential, organic ligand concentration, etc). That environment will be controlled by the
10 MgO reacting with brine. Magnesium oxide is added to mitigate the effect of CO₂ generated by
11 microbial degradation of organic materials and to control the pH of any brines in the repository.
12 The mechanism of the control is discussed in Appendix BARRIERS and Appendix PA,
13 Attachment SOTERM.

14 Actinide mobility also depends on the formation of colloids. Actinides can either form intrinsic
15 colloids by condensation of hydrolyzed ions, or can be sorbed on to nonradioactive colloidal
16 particles.

17 **TRU WASTE-2.4.1 Components and Characteristics Influencing Solubility**

18 In the absence of MgO, the factors that would most directly affect solubility in the repository are
19 pH, CO₂ fugacity, redox conditions, the availability of complexing agents, and the source and
20 composition of the brine (clearly not a waste characteristic). The important waste components
21 that affect actinide solubility are steel, cellulosic, plastic, rubber, organic ligand, and
22 cementitious materials. Actinide solubility also depends on temperature. However, the

1 temperature in the repository will remain almost constant (about 300 K) and the thermal effect of
2 exothermal chemical reactions among brine, waste component, and MgO will be negligible (see
3 Appendix WCA, Section WCA-5.3.1 in the CCA and Wang 1996b). Repository pressure does
4 not influence solubility until it is at least an order of magnitude higher than lithostatic pressure
5 and this will not occur (Butcher et al. 1991). The following subsections discuss the influence of
6 waste characteristics and components on each of these factors, as well as those that have little or
7 no influence on solubility.

8 TRU WASTE-2.4.1.1 Components Influencing Redox Environment

9 The components of the waste that greatly influence the redox environment in the inundated
10 WIPP repository are steels and biodegradable organic materials (CPR materials). The
11 radionuclides contributing to the brine release source terms are all actinides. Because of their
12 electronic structure, these elements can form a wide variety of inorganic compounds that
13 dissolve in aqueous solutions like brine in several different valence or oxidation states. In the
14 WIPP environment, the solubilities of these compounds can vary from about 10^{-9} Molar (M) to
15 about 10^{-5} M (see Appendix PA, Attachment SOTERM). In general, for both plutonium and the
16 other actinides, the higher oxidation states (V and VI) are more soluble than the lower oxidation
17 states (III and IV). The redox environment determines which of these oxidation states are likely
18 to be stable in solution under WIPP conditions—an important determinant of solubility because
19 of the differences among oxidation states. Although a detailed discussion of the experimental
20 determination of oxidation state distribution is found in Appendix PA, Attachment SOTERM, a
21 brief discussion is given here.

22 Anoxic conditions will be dominant during the whole time period of 10,000 years. At the time
23 of the CCA, it was believed that anoxic steel corrosion would produce both hydrogen and
24 $\text{Fe}(\text{OH})_2$ (see Wang and Brush 1996). A small amount of oxygen, trapped at emplacement, will
25 be used quickly by oxidic corrosion and microbial action. Based on recent experimental work
26 (described in Appendix PA, Attachment SOTERM), anoxic corrosion of steel could produce
27 hydrogen, and Fe(II) or Fe(II,III)-bearing corrosion products. It has been shown that both
28 metallic iron and Fe^{2+} ($\text{Fe}(\text{OH})_2$) in simulated WIPP brine, under anoxic conditions, will reduce
29 Pu(+VI) stoichiometrically to the much less soluble Pu(+IV). Plutonium (+V) is seen in this
30 chemical reaction as an unstable intermediate. It is expected, therefore, that Pu(+VI) and Pu(+V)
31 will not be stable in solution in WIPP brines. The iron in the drums and waste boxes is enough
32 to provide several thousand-fold excess over what is needed stoichiometrically, even if all the
33 emplaced plutonium existed in the +VI oxidation state. The other metals in the waste may also
34 be able to reduce the actinides, but their effect would be negligible compared to the effect of
35 iron, because they are present in smaller quantities.

36 The oxidation state distribution used in PA, based on experimental data as well as the published
37 literature, is (Katz et al. 1986; Hobart 1990; Clark et al. 1995; Felmy et al. 1996; Rai and
38 Strickert 1980; Rai et al. 1982; Kim et al. 1985; Pryke and Rees 1987; Nitsche and Edelstein
39 1985):

40 thorium: +IV
41 uranium: +IV and +VI
42 neptunium: +IV and +V

1 plutonium: +III and +IV
 2 americium: +III

3 Curium exhibits essentially the same chemical behavior and oxidation state as americium. In
 4 PA, half of the realizations will include the lower oxidation states of uranium, neptunium, and
 5 plutonium; the other half will include the higher oxidation states (CCA Appendix SOTERM,
 6 Section 4.7; Katz et al. 1986; Weiner 1996).

7 TRU WASTE-2.4.1.2 Components Influencing pH and CO₂ Fugacity

8 In the absence of MgO, actinide solubility would be highly dependent on pH and CO₂ fugacity of
 9 the brine. Lower pH and higher CO₂ fugacity could result in higher actinide solubility. Original
 10 Salado and Castile brines exhibit pH values of about 6 and 7, respectively (Brush 1990, Tables 2-
 11 2 and 2-3). The production of CO₂ by microbial degradation in the repository would acidify the
 12 brine and lower the brine pH to about 4.5, if no MgO were added (CCA Appendix SOTERM,
 13 SOTERM.2). Microbial CO₂ production can be described by the following sequential reactions
 14 (Wang and Brush 1996):



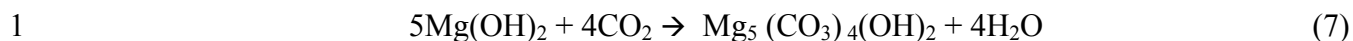
18 Nitrate and sulfate are used as electron acceptors in these reactions and determine CO₂ yield per
 19 mole of organic carbon. Based on the inventory estimates for nitrate and sulfate, over 94% (see
 20 Appendix BARRIERS) of organic materials (CPR materials) would be biodegraded via the third
 21 reaction, methanogenesis, in which one mole of organic carbon will produce one half of a mole
 22 each of CO₂ and CH₄.

23 Based on the inventory estimate for organic carbon (Appendix DATA, Attachment F) and the
 24 estimated CO₂ yield per mole of organic carbon, to mitigate the negative effect of microbially
 25 produced CO₂, 1.41×10^9 moles of MgO will be added to the repository (see Appendix
 26 BARRIERS). At the time of the CCA, it was estimated that 2×10^9 moles of MgO would be
 27 required. However, as discussed below, DOE's understanding of the chemical interaction of
 28 MgO and components of the waste has evolved.

29 In the CCA, the waste components of organic carbon, nitrate, and sulfate were used to determine
 30 the amount of MgO needed. It was stated that hydrated MgO would react with CO₂:



32 The above reaction would buffer the pH at approximately 9.4 in Salado brine and 9.9 in Castile
 33 brine and CO₂ fugacity at 10^{-7} atm for both brines. Actinide solubility calculated for the brine in
 34 equilibrium with Mg(OH)₂ and MgCO₃ is minimal (CCA Appendix SOTERM, SOTERM.3).
 35 Now, however, the quantities of CPR materials, nitrate, and sulfate are used to determine the
 36 amount of MgO needed, based on the understanding that hydrated MgO will react with CO₂:



2 under conditions in which microbial activity produces gas, and



4 under conditions in which microbial activity does not occur (see Appendix BARRIERS).²

5 The above reactions will buffer pH at approximately 9 in both Salado and Castile brines, and
6 CO_2 fugacity at $10^{-6.2}$ to $10^{-5.5}$ atm for both brines.

7 Cementitious waste (that contains calcium oxide and/or calcium hydroxide) could also be
8 expected to raise the pH, and the waste is currently estimated to contain a total of about 1.2×10^7
9 kg cementitious material (Appendix DATA, Attachment F). This amount of cementitious
10 material contains about 9×10^6 moles of $\text{Ca}(\text{OH})_2$. However, this amount of $\text{Ca}(\text{OH})_2$ would not
11 be enough to affect pH or brine composition significantly. It was shown that $\text{Ca}(\text{OH})_2$ could be
12 consumed by reaction with microbial generated CO_2 or with MgCl_2 in the Salado brine and thus
13 the repository chemistry would be dominantly controlled by the $\text{Mg}(\text{OH})_2 / \text{Mg CO}_3$ buffer,
14 rather than the $\text{Ca}(\text{OH})_2 / \text{CaCO}_3$ buffer (CCA, Wang 1996a and Wang 1996c). Because of the
15 additional MgO that will be added, other components of the waste are unlikely to affect the pH.

16 TRU WASTE-2.4.1.3 Waste Components That Directly Enhance Solubility

17 A number of organic compounds are capable of forming strong complexes with actinide ions,
18 thereby stabilizing the actinide in the solution. Of the about 60 organic compounds in the waste
19 (Drez and James-Lipponer 1989; Brush 1990; Drez 1996), 4 of these (acetate, citrate, oxalate,
20 and ethylene diamine tetra-acetate [EDTA]) have been identified to have an effect on actinide
21 mobility, because they are water-soluble and present in significant quantities (Appendix DATA,
22 Attachment F).

23 . Ligand concentrations in the repository were calculated by dividing the current mass of each
24 ligand in the inventory by the brine volume of 29,841 m³, “the smallest quantity of brine
25 required to be in the repository [for] transport away from the repository (Larson, 1996). The
26 effect of these organic ligands on the solubility of actinides in both Salado and Castile brines has
27 been studied, and is discussed in detail in Appendix PA, Attachment SOTERM.

28 To estimate the effectiveness of other metals in binding organic ligands and thereby reducing the
29 free ligand concentrations, some simple competition calculations were performed (for the CCA)
30 using parameters obtained in dilute solutions, because parameters for concentrated salt solutions
31 like the WIPP brines were not available. These metal species included iron (Fe), nickel (Ni),
32 chromium (Cr), vanadium (V), and manganese (Mn), because the steels used for the waste drums
33 contain on average at least 0.001 weight percent of Ni, Cr, V, and Mn as minor constituents.
34 Based on at least 1.9×10^9 moles of steels destined to be disposed of in the WIPP, there should

² The conceptual model for the repository maintains a probability of significant microbial degradation of CPR materials of 0.5. Thus, there is no microbial activity and concomitant gas generation in about half of the PA vectors (Brush and Xiong 2003a; 2003b).

1 be at least 1×10^4 moles of each of Ni, Cr, V, and Mn in the repository (CCA Appendix
 2 SOTERM). There are also expected to be more than 6×10^7 moles of lead (Pb). Additionally,
 3 several other metals that can sequester organic ligands will be present in small quantities.

4 Table TRU WASTE-11 presents complexation constants for several metals with EDTA. These
 5 values were measured in dilute solution. For comparison, for EDTA in 5 molal (moles of solute
 6 per kilogram of solvent) NaCl, the magnesium association constant is $\log K_{Mg} = 6.6$ (Martell and
 7 Smith 1982).

8 **Table TRU WASTE-11. Complexation Constants for Selected Metals¹**

Species	log K
Fe ²⁺	14.3
Cr ²⁺	13.6
Ni ²⁺	18.4
Mn ²⁺	13.9
V ²⁺	12.7
Cu ²⁺	18.9
Pb ²⁺	18

¹ From Martell and Smith (1982).

9 To assess the ability of these metals to sequester the organic ligands, the calculations for
 10 competition between these metals and actinides for organic ligands were performed by the DOE.
 11 The calculation results show that under expected WIPP conditions, 99.8% of the EDTA was
 12 complexed by Ni, effectively rendering it unavailable for complexation with the actinides (CCA,
 13 Appendix SOTERM).

14 ***TRU WASTE-2.4.2 Components and Characteristics Influencing Colloidal Actinide***
 15 ***Mobility***

16 The waste components that directly contribute to actinide colloid formation include mineral
 17 fragments, and humic substances (soil). CPR materials can contribute to the quantity of humic
 18 colloids. Actinides can form intrinsic colloids or can be sorbed on to nonradioactive colloidal
 19 particles. A complete discussion of colloid formation in the WIPP can be found in CCA
 20 Appendix SOTERM and Papenguth (1996a through 1996e). A summary of that discussion
 21 follows.

22 In principle, intrinsic colloids are formed by condensation (or polymerization) of hydrolyzed
 23 actinide ions. Examples of polymeric species of many of the actinides of importance to the
 24 WIPP have been found in the literature (see Papenguth and Behl (1996) for an extensive
 25 literature review). However, except for Pu, the intrinsic colloids of other actinides (Am, U, Th,
 26 and Np) do not develop to sizes large enough to affect transport behavior of these actinides
 27 relative to their dissolved form. Therefore, the intrinsic colloid concentrations for Am, U, Th,
 28 and Np are modeled as zero in the disposal room and only intrinsic plutonium colloids have any
 29 impact on performance. Plutonium(IV) readily forms an intrinsic colloid; evidence suggests that

1 the initial polymerization, or condensation, of hydrolyzed Pu(IV) produces a macromolecule that
2 becomes progressively more crystalline with time. As the Pu polyelectrolytes mature, they are
3 expected to be kinetically destabilized and immobilized by the high ionic strength of the WIPP
4 brines, then coagulate and settle out of solution.

5 Within the repository, mineral fragment colloids could form from corrosion of iron-bearing
6 waste, soils, and portland cement-based matrices. Because a wide range of mineralogies with
7 different sorptive behavior are present at the WIPP, a bounding approach is used to estimate the
8 maximum concentration of actinides bound to mineral fragment colloids. Mineral fragments are
9 expected to be kinetically destabilized in the high-ionic strength brines present in the disposal
10 room. Experimental information, combined with a conservative estimate of adsorption site
11 density, provided a most likely value of 2.6×10^{-9} mole of colloidal mineral-fragment-bound
12 actinides per liter of dispersion; the experimental results were increased by a factor of two to
13 account for the possibility that the indigenous mineral fragment colloids in the Culebra could
14 sorb dissolved actinides. This value is presumed to be the same for all five key actinides.
15 Although mineral fragments contribute to actinide mobility and are included in PA, their
16 contribution is negligible and they do not impact repository performance (see Appendix PA).

17 Humic colloids will be present in the repository, both (a) in soil and humic material that is part of
18 the emplaced waste and (b) in colloids that will be formed if the CPR materials in the waste are
19 microbially degraded. The contribution of humic colloids to repository performance is therefore
20 calculated by quantifying humic-actinide complexation coupled with solubilities of humic
21 substances in WIPP brines, and expressing the result as the ratio of moles of humic-bound
22 actinide to moles of dissolved actinide. The range of ratios is from about 4.3×10^{-4} to about 6.3
23 in Castile brine and from about 5.3×10^{-5} to about 6.3 in Salado brine.

24 To compute the concentration of actinides bound to humic substances, several parameters, such
25 as solubility of humic substances, site binding capacity, actinide complexation factors, and
26 stability constants, were measured or obtained from published literature (Papenguth 1996c).
27 The oxidation state analogy was also used to develop parameter values for actinides expected to
28 have multiple oxidation states in the WIPP disposal rooms. In addition, the theoretical maximum
29 concentration of actinides that can be bound to humic substances was also computed and found
30 to be 1.1×10^{-5} M.

31 The other major source of colloidal material in the repository is the microbes themselves, though
32 they are not necessarily waste components. Microbes are known to actively bioaccumulate
33 actinides intercellularly, as well as act as substrates for passive extracellular sorption. Naturally
34 occurring halophilic and halotolerant microbes have been observed in the Salado brines at the
35 WIPP site (Brush 1990 and Francis and Gillow 1994). The waste material in the disposal room
36 would serve as a nutrient and substrate for microbes, and consequently increase the microbe
37 population, making them potentially important to actinide mobility.

38 The uptake of actinides by microbes and humic substances is quantified through two parameters
39 for each actinide and substrate: proportionality constants (with PA parameter designations
40 PROPMIC, PHUMSIM, and PHUMCIM) that describe the amount of each actinide bound to
41 mobile microbes and humic colloids, respectively; and the maximum concentrations (CAPMIC
42 and CAPHUM) of each actinide associated with mobile microbes and humics, respectively. As

discussed above, the concentrations of mineral-fragment-bound actinides and intrinsic actinides are very small, and are presented as concentrations (CONCMIN and CONCINT) only. A series of bioaccumulation and toxicity experiments were performed to obtain the following values of PA parameters for each actinide shown in Table TRU WASTE-12.

Table TRU WASTE-12. Colloid Concentration Factors

	Concentration on Mineral Fragments ¹	Concentration as Intrinsic Colloid ¹	Proportion Sorbed on Microbes ²	Maximum Sorbed on Microbes ¹	Proportion Sorbed on Humics ²		Maximum Sorbed on Humics ¹
					Salado	Castile	
Th	2.6×10^{-8}	0.0	3.1	0.0019	6.3	6.3	1.1×10^{-5}
U(IV)	2.6×10^{-8}	0.0	0.0021	0.0023	6.3	6.3	1.1×10^{-5}
U(VI)	2.6×10^{-8}	0.0	0.0021	0.0023	0.12	0.51	1.1×10^{-5}
Np(IV)	2.6×10^{-8}	0.0	12.0	0.0027	6.3	6.3	1.1×10^{-5}
Np(V)	2.6×10^{-8}	0.0	12.0	0.0027	9.1×10^{-4}	7.1×10^{-3}	1.1×10^{-5}
Pu(III)	2.6×10^{-8}	0.0	0.3	6.8×10^{-5}	0.19	1.1	1.1×10^{-5}
Pu(IV)	2.6×10^{-8}	1.0×10^{-9}	0.3	6.8×10^{-5}	6.3	6.3	1.1×10^{-5}
Am	2.6×10^{-8}	0.0	3.6	NA	0.19	1.1	1.1×10^{-5}

¹ in units of moles total mobile actinide per liter

² in units of moles microbial actinide per moles dissolved actinide

As evident in Table TRU WASTE-12, microbial colloids can transport concentrations of actinides that are several multiples of the dissolved concentration, and thus increase the potential for actinide mobility considerably. Humic colloids are waste components, and microbial colloids increase in quantity as they metabolize waste components. Both types of colloids are incorporated in PA (details are discussed in Appendix PA) and are expected to affect disposal system performance.

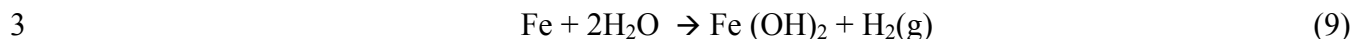
The treatment of colloids in CRA-2004 is like that of the CCA. The only difference between the CCA colloid assumptions and values and CRA-2004 colloid assumptions and values is in relation to the microbial colloids. In the CCA, microbial colloids were present in all calculations as described above. For CRA-2004, in the absence of microbes (PA assumes that microbes are present in only 50 percent of the calculations), microbial colloids are not included in the calculations.

TRU WASTE-2.5 Nonradioactive Waste Components and Characteristics

TRU WASTE-2.5.1 Gas Generation

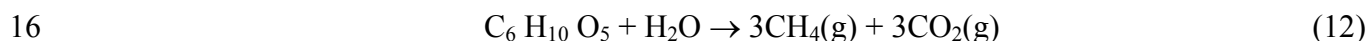
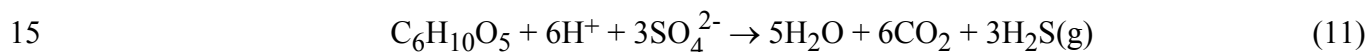
The waste components that contribute to gas generation are: (a) ferrous and nonferrous metal, (b) CPR materials, and (c) nitrate and sulfate. Water content of the waste also contributes to the generation of gas. The mechanisms and reactions for gas generation are discussed in Wang and Brush 1996.

1 Metal can contribute to gas generation through corrosion. The anoxic corrosion reaction of iron
2 is:



4 The hydrogen gas produced by this reaction contributes to total gas pressure, but does not affect
5 repository chemistry. In addition, steel corrosion is likely to consume water in the repository;
6 this effect is taken into account in the computer code BRAGFLO. Nonferrous metals such as
7 aluminum alloys can also corrode, producing H_2 , but their contribution to total gas pressure is
8 negligible, because they are present in much smaller quantities than iron (Appendix DATA,
9 Attachment F).

10 CPR materials and nitrate and sulfate control microbial gas generation. CPR materials can be
11 used as substrates by anaerobic microbes in the WIPP. Nitrate and sulfate can be used as
12 electron acceptors by microbes to oxidize the organic materials. Organic materials are likely to
13 be biodegraded through reactions:



17 The above reactions will proceed sequentially according to the energy yield per mole of carbon
18 in each reaction. Based on the inventory estimates for nitrate and sulfate, the third reaction is
19 expected to be dominant. Because the CO_2 produced by these reactions will be removed by
20 reaction with MgO , methane is the primary, microbially generated gas that will contribute to the
21 total gas in the repository.

22 Phosphate in the waste may enhance microbial activity in the repository. The rates of cellulosic
23 material biodegradation used in PA are derived from the incubation experiments amended with
24 nutrients including phosphate. Thus, the effect of phosphate on microbial reactions is captured
25 indirectly in the parameters submitted to PA (Francis and Gillow 1994).

26 Based on the inventories of steels and organic materials and the rates of gas generation
27 estimated, microbially produced gases may dominate early in the repository's history. Gas
28 pressure can affect repository performance. Pressure in the repository may approach lithostatic,
29 initiating or propagating fractures within the interbeds, and clay seams in the Salado. Gas
30 pressure will not exceed lithostatic (Butcher et al. 1991) because gas can leak out through the
31 interbeds.

32 Gas pressure is incorporated into PA through parameters in BRAGFLO calculations.

33 The initial water content of the waste also contributes to the generation of gas because it defines
34 how much brine is immediately available for the corrosion reaction. All of the liquid in the
35 waste is assumed to be aqueous with no volume correction. A mean value of 0.06 percent is
36 assumed in PA for the initial free unbound water saturation of the waste, based on waste

1 characterization data and transportation restrictions on the amount of free liquid that the waste
2 can contain (Appendix PAR, Table PAR-39 in the CCA).

3 Materials such as dry portland cement, vermiculite, and other sorbents have intentionally been
4 added to the waste to absorb any excess water that may be present. Sorbed water is much less
5 readily available than any brine available from the surrounding rock. Therefore, the effect of
6 initial water content on gas generation is negligible.

7 ***TRU WASTE-2.5.2 Components and Characteristics Influencing Physical Properties***

8 As noted in Tables TRU WASTE-4 and TRU WASTE-5, the following physical properties of
9 the solid waste components are used in PA:

10 Compressibility: This property is a measure of deformational stress-strain response of the waste
11 material. The response of the waste is modeled to represent the conventional 55-gallon drums,
12 pipe overpack configurations, and the supercompacted waste.

13 Strength: Strength of the waste is only of concern in the highly degraded state. Strength
14 properties enter directly into PA human intrusion scenarios, whereby a driller inadvertently
15 intersects a repository room. If high pressures exist in the disposal room, a pressure gradient
16 pulse could induce tensile failure and transport of waste particulate into the wellbore—the
17 spalling event. In addition, the drill bit and drilling fluid circulate in the advancing wellbore and
18 set up fluid shear stress in the degraded waste. The effects of waste strength on room closure are
19 included in the discussion of compressibility.

20 Porosity: Initial porosity of the waste room is modified by salt creep. The waste inventory
21 establishes the initial porosity as well as mechanical resistance to the impinging salt. Waste
22 porosity is directly incorporated into the PA via a porosity surface.

23 Permeability: Permeability controls movement of fluids in the waste rooms, and therefore is an
24 important parameter for the Salado fluid flow calculations. Permeability is also a key
25 consideration within the human intrusion conceptual model, as it enters into the calculations of
26 material transport to well bore.

27 ***TRU WASTE-2.5.2.1 Compressibility***

28 An important characteristic of the WIPP repository is the closure of the disposal rooms over time
29 due to the creep response of the surrounding salt in response to the presence of the mined
30 openings. This ability of salt to deform with time, eliminate voids, and create an impermeable
31 salt barrier around waste is one of the principal reasons for locating the WIPP repository in a
32 bedded salt formation, as suggested by the National Academy of Sciences (NAS-NRC 1957).
33 This closure process is rather complex, and the rate at which it occurs depends in large part on
34 the balance of forces tending to close the repository (the far-field lithostatic stresses) and those
35 resisting the closure. These resisting forces are the tendency of the waste to resist deformation,
36 measured in terms of its compressibility, and the effect of any gas pressure within the rooms.

37 At the time of the CCA, the compressibility of the waste was determined from laboratory
38 experiments on 55-gallon drums (Butcher et al. 1991). Waste containers other than the 55-gallon

1 drum package have been delivered to WIPP and other forms, such as supercompacted waste, are
2 anticipated to be sent. Therefore, the response model incorporated into the CRA-2004
3 calculations was enhanced to account for a range of structural responses. Updated coefficients
4 developed for the volumetric plasticity model were based on modeling analysis of other waste
5 forms (Weatherby et al. 1991; Park and Hansen 2003). The wastes were characterized by their
6 general structural form, which predominantly depends on the packaging. Appendix PA describes
7 the calculations that were used to evaluate the competing conditions of creep closure, waste
8 rigidity, and gas generation to yield porosity histories that are compiled into a porosity surface
9 for incorporation into PA calculations.

10 TRU WASTE-2.5.2.2 Strength

11 Shear and tensile strength are important parameters in the models for cavings and spallings
12 releases, respectively. It is likely that alternative waste forms, such as the pipe overpacks and the
13 supercompacted wastes, will be less likely to degrade and corrode than standard waste forms,
14 and as such their mechanical strengths may be expected to be equal to or higher than standard
15 waste.

16 Degraded material property estimates were recently summarized for the spallings model peer
17 review (Hansen et al. 2003). The authors assert that degraded waste properties determined for
18 the new spall model, DRSPALL, represent extreme bounds of the future possible states of the
19 waste because strengthening processes are not included in the minimal shear and tensile strength
20 properties determined for surrogate degraded waste. It is likely that the new waste forms, such as
21 the pipe overpacks, would render the waste less vulnerable to collapse and more resistant to
22 massive corrosion.

23 Shear Strength. The shear strength implemented in PA is used to calculate the volume of
24 cavings release, hence, it is a measure of erosional shear resistance. In the CCA, the waste shear
25 strength was sampled from a uniform distribution from 0.05 to 10 Pascal (Pa) Pa, which is
26 conservatively based on properties of marine clays (Appendix PA, Attachment MASS, Table
27 MASS-1). For the PAVT, the waste shear strength was estimated based on particle size
28 distribution determined by an expert elicitation panel. With this approach, the calculated critical
29 shear strength ranged from 0.64 to 77 Pa. The EPA then retained the original lowest value and
30 assigned a log-uniform distribution ranging from 0.05 to 77 Pa. Based on work by Jepsen et al.
31 (1998), the lower value of 0.05 Pa is considered to be extremely conservative. Using the 50
32 percent degraded waste surrogates that represent the extreme possibilities for degradation of the
33 WIPP waste (Hansen et al. 1997, Hansen et al. 2003), an average critical shear strength of 1.4 Pa
34 was determined. The minimal critical shear strength could approach this measured value only if
35 massive degradation of waste ensues and no cementation or compaction of degraded waste
36 occurs. The current minimum value sampled for the waste shear strength is thus at least 30 times
37 smaller than the minimum value supported by empirical data.

38 Tensile Strength. Tensile strength is used in the calculation of spall volumes following a drilling
39 intrusion. In the CCA, spall volumes were computed by a model of gas flow through fractures.
40 Tensile strength entered the calculation of spall volumes by defining an effective gravity
41 coefficient, which resisted particle mobilization in the flowing gas. The CCA calculations used a
42 constant tensile strength of 0.0069 megapascal (MPa) (1 psi) (Helton et al. 1998). In response to

1 EPA's review of the CCA, a new mechanistic model for spillings was developed in which gas
2 flow in the waste may induce tensile failure of the waste material, and thus lead to spillings. The
3 mechanistic model, called DRSPALL, served as the basis for a replacement for the CCA
4 spillings model. In support of DRSPALL, a separate analysis determined an appropriate
5 distribution for tensile strength would range from 0.12 MPa to 0.17 MPa (Hansen et al. 2003).

6 The range of tensile strength reported by Hansen et al. (2003) assumes that the waste is a weakly
7 consolidated particulate material, representing an extreme case of waste degradation. The
8 characteristics of the more robust waste forms (supercompacted and pipe overpack waste) would
9 tend to less degradation, so the tensile strength of these waste forms would certainly be greater
10 than the minimal values currently used in DRSPALL (Hansen et al. 2003). Therefore, the
11 current range of tensile strength proposed for the DRSPALL model and for the CRA-2004 is
12 conservative.

13 TRU WASTE-2.5.2.3 Permeability

14 The likely mechanical and physical form of the supercompacted and pipe overpack wastes over
15 time indicates that the permeability of these waste forms will be at least as great as that of
16 standard waste, and may be higher.

17 In the CCA, the waste permeability was assigned a value of $1.7 \times 10^{-13} \text{ m}^2$ (Butcher 1996) based
18 on the value used in the 1991 PA. The 1991 PA value was a composite value based on the
19 relative quantities of three different types of materials (combustible, metals/glass, and sludges)
20 each with an inherent range of permeabilities, which had previously been determined for
21 compressed surrogate wastes (Luker et al. 1990). In their review of the data used in the CCA,
22 the EPA recalculated this value as $2.4 \times 10^{-13} \text{ m}^2$, although they conceded that the difference was
23 small enough to be inconsequential (EPA 1997). This revised value is being used in the current
24 PA calculations.

25 A constant value for permeability is used in PA, even though it is expected that there will be
26 some variability in this parameter. The reason for this single value being acceptable is primarily
27 because this permeability value is much higher than the surrounding salt and the disturbed rock
28 zone, as discussed in 1991 PA. In addition, the coefficient of variation for the uncertainty in
29 measured permeabilities is too small to justify treating waste permeability as an uncertain
30 parameter (Rechard and Tierney 2003). Finally, Vaughn et al. (1995) discuss whether
31 permeability should be a function of porosity, since porosity is treated as a time-varying quantity
32 in BRAGFLO while permeability is a constant. Their analysis concluded that including a
33 dynamic model for permeability had an insignificant effect on waste room conditions (pressure
34 and saturation), and an insignificant effect on resulting releases.

35 Waste Permeability of the New Waste Forms. The underlying assumption with respect to the
36 new waste forms is that the pipe overpacks and supercompacted wastes will be more durable
37 than the original baseline package of the 55-gallon drum. The rigidity of the waste and its
38 packaging, such as the pipe overpack and supercompacted waste, tends to hold the room open
39 and preserve the structural integrity of the waste stack. The logical evolution involved with
40 disposal of a more rigid and armored waste package would be preservation of a large portion of
41 the waste in its original, intact form as it will deform only modestly as compared to the standard

1 waste form. Thus, the architecture of the waste comprises bulky, compressed steel containers
2 that envelope the waste, and the rigid structure would tend to maintain the open channels
3 between individual drums and packages, so that much of the original porosity inherent in the
4 three-dimensional disposal configuration would be preserved. Permeability of this future state of
5 the waste would tend to be high relative to the values implemented in the CCA and PAVT. This
6 conclusion is reinforced by the results of the porosity surface calculations, which show that in the
7 absence of gas generation the long-term porosity of the supercompacted and pipe overpack
8 wastes is considerably higher than for standard waste, while with high gas generation rates the
9 porosities are essentially the same (Park and Hansen 2003).

10 Waste Permeability in Process Models. Other conclusions can be drawn about the possible
11 effects of waste heterogeneity on brine and gas flow in the repository. Vaughn et al. (1995,
12 DR6) discuss how heterogeneity in the waste may cause flow to follow channels or preferential
13 paths, and result in spatially varying saturations referred to as “puddling.” Their analysis
14 demonstrated that inclusion of puddling in the BRAGFLO model had an insignificant effect on
15 waste room conditions (pressure and saturation), and an insignificant effect on resulting releases.

16 Waste Permeability in Direct Release Models. Waste permeability can affect the models for
17 spallings and for direct brine releases. A pertinent study of the effects of spatially variable waste
18 permeability was conducted as part of the spalling model investigations reported in Hansen et al.
19 1997. Calculations of gas flow through the porous waste regions were conducted to evaluate the
20 influence of model assumptions on the predicted two-phase pressure response of the disposal
21 rooms during a drilling intrusion. Results of the modeling indicated that the effect of waste
22 heterogeneity is to reduce the pore pressure gradient close to the intruded wellbore; because this
23 gradient is the major cause of tensile failure, any possible spall volumes are reduced.

24 ***TRU WASTE-2.5.3 Components and Characteristics Affecting Heat Generation***

25 Heat generation is a characteristic of some components of the waste, or of their interactions. The
26 WIPP includes two possibly significant sources of heat: the heat generated by RH-TRU waste
27 (DOE 1995), and the heat generated by MgO hydration and carbonation, aluminum corrosion,
28 cement hydration, and organic biodegradation.

29 ***TRU WASTE-2.5.3.1 Exothermic Reactions***

30 MgO hydration and carbonation, aluminum corrosion, cement hydration, and organic
31 biodegradation are all exothermic reactions. Evaluation of the ability of each of these reactions
32 to produce heat while conservatively accounting for the repository’s ability to dissipate the
33 resulting heat generated has provided the following maximum temperature increases (Wang
34 1996d and Appendix PA, Attachment SCR), as shown in Table TRU WASTE-13:

1 **Table TRU WASTE-13. Maximum Temperature Increases**

Reaction Number	Maximum Temperature Increase (K)
MgO hydration	4.7
MgO carbonation	0.7
Cement hydration	2.5
Microbial degradation	1.4
Aluminum corrosion	6.8

2 In the worst case, a temperature increase of 6.8 K could be experienced (Appendix PA,
 3 Attachment SCR). However, these temperature extremes will not persist, if they are ever
 4 reached at all. Because all but one reaction consume brine, possible reactions will be competing
 5 with each other for what brine may enter the repository and will therefore temper the heat
 6 increase that could be predicted based on the most exothermic reaction alone. To evaluate the
 7 worst case possible, for the maximum temperature increase to be realized from the corrosion of
 8 aluminum, all of the aluminum would have to be corroded within 2.5 years, after which the heat
 9 would be dissipated very rapidly. Therefore, if such a condition were to be created, it would be
 10 transitory on the repository time scale and its influence inconsequential.

11 The effect of small temperature increases arising from exothermal reactions was previously
 12 screened out of the PA on the basis of low consequence to factors such as creep closure, seal
 13 performance, transport, etc. (see Appendix PA, Attachment SCR). The effect of heat generated
 14 by radiolysis has been considered as part of the repository conditions (Brush 1990) and utilized
 15 in the specification of experimental parameters, thus yielding data consistent with the anticipated
 16 conditions. Additionally, the small temperature increases cited above for exothermic reactions
 17 are insignificant to the thermodynamic modeling of solubility. For example, a temperature
 18 increase of 7°K would result in an approximately three percent change in the free energy of
 19 formation of any species contained within the model. This value is well within the model
 20 parameter bounds.

21 TRU WASTE-2.5.3.2 RH-TRU Thermal Heat Load

22 The “worst case” heat load from RH-TRU emplaced in the WIPP is estimated to be between 47
 23 and 54 watts per cubic meter, which would result in a temperature rise near the canister of
 24 between 1.87°K and 2.09 K (2.85 – 3.19 K in the CCA). The expected WIPP average
 25 temperature increase from RH-TRU heat loading is between 0.23 K and 0.29 K (0.38 – 0.49 K in
 26 the CCA). The RH-TRU thermal heat load is small enough that there is no impact on repository
 27 performance. A more complete discussion and analysis is given in Djordjevic (2003) and
 28 Appendix PA, Attachment SCR.

29 **TRU WASTE-2.6 Summary**

30 The waste characteristics and components expected to be most significant to performance are the
 31 predominant radionuclides and those characteristics and components affecting actinide mobility.

1 The waste characteristics and components expected to be significant to performance are
 2 summarized in Table TRU WASTE-14.

3 It should be noted that these components and characteristics have both positive and negative
 4 effects on performance. Iron has a beneficial effect because it reduces actinides to lower, less
 5 soluble oxidation states. Nonferrous metals are beneficial because they compete with the
 6 actinides for the binding sites on organic ligands, thereby reducing the solubilities of the
 7 actinides. Mobility enhancers like colloidal substrates, on the other hand, have a detrimental
 8 effect. Gas buildup can both enhance and detract from repository performance. Although gas
 9 can open fractures, it can also keep brine from entering the repository, thereby reducing transport
 10 of soluble actinides (SNL 1991).

11 Table TRU WASTE-15 summarizes those characteristics and components with an insignificant
 12 impact on performance.

13 **Table TRU WASTE-14. Waste Characteristics and Components Expected to be Most**
 14 **Significant to Performance**

Component	Characteristic	Reason for Significance
²³⁹ Pu, ²⁴⁰ Pu, ²⁴¹ Am, ²³³ U, and ²³⁴ U	Activity	99 percent of EPA unit after 2,000 years
²³⁸ Pu	Activity	Dominates EPA Unit at early times
Pu and Am	Solubility	Large EPA Unit; mobility depends on solubility
²³⁸ U	Activity	Very low activity; dilutes Higher-Activity Uranium Isotopes For Brine-Based Releases
Iron	Corrosion	1. Maintains reducing environment; lower, less soluble oxidation states of actinides predominate 2. Corrosion produces hydrogen, increasing gas pressure
CPR Materials, Nitrate, Sulfate	Nutrient for microbes	Microbial nutrients are metabolized to methane and other gases, increasing gas pressure; formation of colloids
Humic Materials, Cellulosic Materials breakdown products	Colloid formation	Form humic colloids that sorb and transport actinides
Organic Complexation	Nonferrous metals	Reduce actinide solubilities by competing with the actinides for the binding sites on organic ligands.
Tensile and Shear strength	Waste strength	Important to spalling and cavings

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Table TRU WASTE-15. Waste Characteristics and Components Expected to be Not Significant

Characteristics/Component	Reason for insignificant impact
Radionuclides (other than those in Table TRU WASTE-14)	EPA Unit is negligible fraction of total, even with ingrowth
Substances that may affect pH ¹	pH is buffered by MgO
Substances that produce CO ₂ ¹	CO ₂ is removed by reaction with MgO
Intrinsic and mineral fragment colloids	Fraction of actinides mobilized by these colloids is insignificant
Organic ligands	Removed by binding with Mg and nonferrous metal
Heat generated by exothermic reactions	Temperature rise is negligible; heats of formation are very small paired with a large thermal mass of the repository
Fluid in the waste	Negligible compared to brine volume

¹ These components are significant for gas generation, but not for actinide solubility.

TRU WASTE-3.0 WASTE COMPONENTS LIMITS

The objective of this section is to satisfy the requirements specified in 40 CFR.194(c)(1) as stated in Section TRU WASTE-1.1.

This section updates Appendix WCL in the CCA by presenting the rationale for the upper and lower limits for waste components identified as potentially significant to disposal system performance (Table TRU WASTE-4). The sensitivity analysis in Appendix PA supports the conclusions that the disposal system performance is not sensitive to most properties of the emplaced waste and limits remain unnecessary for the components identified in Tables TRU WASTE-5 and TRU WASTE-6.

Table TRU WASTE-16 shows:

- Waste components listed as potentially significant in Table TRU WASTE-4,
- Waste characteristics these components influence,
- Constituents of the components for which assaying during emplacement is required, and
- Limits for emplacement of each component, if necessary.

This table illustrates that most components, associated characteristics, assay requirements, and emplacement limits have not changed since the CCA. The following discussion provides the rationale for the proposed assaying and emplacement limits for each component listed in Table TRU WASTE-16. All of the components listed in Tables TRU WASTE-5, TRU WASTE-6 and TRU WASTE-15 were found to be insignificant to disposal system performance, as was true for the CCA. Therefore, it is not necessary to establish emplacement limits for them other than limits based on the current TRU waste inventory or imposed on waste through limitations in the Contact Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (DOE 2002a).

The emplacement limits identified in Table TRU WASTE-16 provide an envelope of fixed inventory values on a repository scale, without an associated uncertainty. That is, the limiting values are imposed to ensure compliance, and in fact represent the upper “end” of an uncertain range. To ensure these waste component limits are not exceeded, inventory quantities and uncertainty in those quantities will be tracked during the operational phase of the repository. This tracking is accomplished using the WWIS. If inventory estimates change over the operational life of the WIPP, new inventory estimates will be used in PA and revised limits for waste components will be developed based on the PA results in a future recertification application.

TRU WASTE-3.1 Radionuclide Components

As discussed in Section TRU WASTE-2.3, the following radionuclides have activities greater than one EPA unit at closure: ^{241}Am , ^{238}Pu , ^{239}Pu , ^{240}Pu , ^{242}Pu , ^{233}U , ^{234}U , ^{90}Sr , and ^{137}Cs .

1 **Table TRU WASTE-16. Emplacement Limits for Waste Components**

Components	Associated Characteristics	Constituent Components Requiring Assaying	Emplacement Limits
Radionuclides	Radioactivity at closure Radioactivity after closure Solubility Colloid formation Redox state	²⁴¹ Am ²³⁸ Pu ²³⁹ Pu ²⁴⁰ Pu ²⁴² Pu ²³³ U ²³⁴ U ²³⁸ U ⁹⁰ Sr ¹³⁷ Cs	none ¹
Ferrous metals (iron)	Redox potential H ₂ gas generation complexing with organic ligands	None	Minimum = 2.0×10^7 kg (amount from containers) ²
CPR materials	Gas generation Humic colloids (see below)	Sum	Maximum = 2.2×10^7 kg ³
Sulfates	Gas generation	None	None ⁴
Nitrates	Gas generation	None	None ⁴
Solid components	Particle size Effective shear resistance to erosion Tensile strength	None	None
Free water emplaced with waste	Gas generation	None	Maximum = 1684 m ³ (limit of one percent total waste volume as set by the WAC) ⁵
Humic substances	Radionuclide-bearing humic colloids	None	None
Nonferrous metals (metals other than iron)	Reduce actinide solubilities by competing with the actinides for the binding sites on organic ligands.	None	Minimum = 2.0×10^3 kg ⁶
Organic ligands	Solubility	None	None ⁴

¹ Inventory curie content will be tracked.

² Minimum sets to ensure sufficient reactants for reducing radionuclides to lower and less soluble oxidation states.

³ Maximum set to ensure sufficient MgO is available to react with CO₂ produced.

⁴ For the current waste generation processes that are documented in Appendix DATA.

⁵ One percent of the design basis values for CH-TRU of 168,485 m³.

⁶ Minimum quantity for complexing with organic ligands (see Appendix PA, Attachment SOTERM).

2 The total activity of the waste at emplacement and during the entire 10,000-year performance
3 period is dominated by the activities of four emplaced radionuclides: ²⁴¹Am, ²³⁸Pu, ²³⁹Pu, and
4 ²⁴⁰Pu. The radionuclides, ²⁴²Pu, ²³³U and ²³⁴U, have significantly less total activity than the other
5 Am and Pu components, but since their activities exceed one EPA unit they are not excluded
6 from assaying requirements. The ²³⁸U component is to be assayed as well, because its large mass
7 fraction and low activity dilutes the overall activity of transported uranium species. The ⁹⁰Sr and
8 ¹³⁷Cs components can contribute to direct releases at the surface resulting from inadvertent
9 intrusion during the first several hundred years or so after closure.

1 Because of radioactive decay and ingrowth, the major contributors to the overall activity of the
2 repository among these radionuclides change during 10,000 years. For the first several hundred
3 years, ^{241}Am , ^{238}Pu , ^{239}Pu , and ^{240}Pu are important contributors to the total activity of the waste.
4 At the present and projected inventory level, ^{90}Sr and ^{137}Cs may be important for about 200
5 years. The ^{241}Am component continues to be important for about 3,000 years. At 10,000 years,
6 ^{239}Pu and ^{240}Pu remain as the only significant contributors to the total activity of the waste.
7 Because the activities of these radionuclides in existing and projected waste overwhelmingly
8 exceed the activities of all other radionuclides combined, they are the most important for
9 repository performance modeling.

10 The total activity of the waste is not important for compliance with the criteria at 40 CFR §
11 194.24(c) because the containment requirements are normalized to the initial inventory.
12 However, the PA is sensitive to relative changes in inventory curie content as a function of
13 radionuclide decay and ingrowth over time. The magnitude of change in the total curie content
14 depends on the initial ratios of the total activities of the assayed radionuclides at the time of
15 repository closure. Accordingly, the results of the PA are conditional on the initial ratios in the
16 inventory. The criteria in 40 CFR § 194.15(a)(5) state that:

17 In submitting documentation of continued compliance pursuant to section 8(f) of the WIPP
18 LWA,.... Updated documentation shall include:... A description of all waste emplaced in the
19 disposal system since the most recent compliance certification or recertification application.

20 The PA for this and future recertifications must therefore incorporate the adjusted inventory
21 curie content reflecting any significant changes relative to projected values for the important
22 radioisotopes (plus ^{238}U) that are being accumulated. At repository closure, the ratios of the
23 activities of the ten listed radionuclides (Table TRU WASTE-15) may or may not be similar to
24 those ratios used in this assessment, but compliance with the containment requirements of 40
25 CFR §191.13 will be maintained for the full capacity of emplaced waste at the WIPP.

26 **TRU WASTE-3.2 Ferrous and Ferrous Alloy Components**

27 Ferrous and ferrous-alloy metal components in the waste have two significant effects on the
28 repository. Ferrous and ferrous-alloy metal may corrode, thus creating gas, and they provide
29 reducing conditions in the repository (see Section TRU WASTE-2.4.1).

30 The results of the CRA-2004 PA demonstrate that total normalized release from the repository is
31 relatively insensitive to gas generation by corrosion. As shown in Figures PA-97 through PA-99
32 in Appendix PA, at probabilities greater than 0.01, total normalized release is dominated by
33 cuttings and cavings releases. The cuttings and cavings release mechanism is completely
34 independent of repository hydrologic conditions, such as gas pressure or brine saturation, at the
35 time of the intrusion. This independence from repository pressure leads to the conclusion that
36 total normalized release will be insensitive to gas generation. The other two direct release
37 mechanisms for the CRA-2004 PA, spallings and direct brine release, are dependent on the
38 quantity of gas generated. These two release mechanisms occur only if the pressure in the
39 repository exceeds 8 MPa (Appendix PA, Sections PA.4.6 and PA.4.7.1). This pressure (8 MPa)
40 corresponds to the hydrostatic pressure at the repository depth in a column of drilling mud.

1 The waste inventory contains sufficient ferrous and ferrous-alloy components that gas could be
2 generated sufficiently in excess of that required to reach 8 MPa in the repository. In fact, there is
3 always an excess of ferrous and ferrous-alloy metals, in the sense that the inventory of these
4 metals is never depleted in any of the 300 realizations for the CRA-2004 PA (Stein and Zelinski
5 2003b). In this situation, PA already uses an extreme value for the mass of ferrous and ferrous-
6 alloy metals, so that a maximum value for the mass of ferrous and ferrous-alloy metals would be
7 extraneous (have no impact) on PA.

8 In summary, the dominance of the cuttings/cavings mechanism for total normalized release, and
9 the excess mass of ferrous and ferrous-alloy metals in the initial inventory imply that it is
10 unnecessary to place restrictions on the quantity of ferrous and ferrous-alloy metals emplaced for
11 the purpose of controlling the quantity of gas generated.

12 On the other hand, ferrous and ferrous-alloy metals (and their corrosion products) provide the
13 reactants that reduce radionuclides to lower and less-soluble oxidation states. As discussed in
14 Section TRU WASTE-2.4.1.1, the anticipated quantity of these metals, principally from waste
15 containers, to be emplaced in the WIPP is orders of magnitude in excess of the quantity required
16 to assure reducing conditions. Therefore, no upper or lower limit need be established for the
17 quantity of ferrous and ferrous-alloy metals that may be emplaced, beyond the CCA projection
18 of the ferrous and ferrous-alloy metals in the waste containers.

19 **TRU WASTE-3.3 CPR Materials, Nitrate, and Sulfate Components**

20 The CPR materials, nitrate, and sulfate components of the waste influence the production of CH₄
21 gas in the repository by microbial action. Although the PA assigns a probability of 0.5 that
22 microbial degradation will produce significant quantities of gas, the lower limit for these
23 materials is effectively zero. As discussed in the preceding section, releases are dominated by
24 cuttings/cavings, which is independent of repository pressure at the time of the intrusion. In
25 addition, direct brine release and spallings are not sensitive to the quantity of gas generated, and
26 the inventory of ferrous and ferrous-alloy metals is in excess of that required to produce a
27 significant amount of gas (pressures of 8 MPa, or greater). Therefore, the additional components
28 influencing microbial degradation have negligible impact on performance, and it is unnecessary,
29 with respect to gas generation, to assign an upper limit on the amount of these materials that may
30 be emplaced in the repository.

31 However, an upper limit on the total amount of CPR materials is still necessary to ensure that the
32 amount of emplaced MgO is adequate. The current waste inventory indicates that there will be
33 2.19×10^7 kg of CPR materials disposed in WIPP. Since the amount of MgO currently projected
34 for the WIPP is greater than the amount needed to react with the CO₂, the upper limit for CPR
35 materials is set to 2.2×10^7 kg. Additional information on the safety factor for MgO relative to
36 the emplaced mass of CPR materials is provided in Appendix BARRIERS-2.5.

37 **TRU WASTE-3.4 Solid Components**

38 Solid components in the waste affect the waste characteristics of effective shear resistance to
39 erosion, particle size, and tensile strength. These properties affect releases from cavings and
40 spallings during a drilling intrusion. The basic conceptualization for the assignment of these

1 properties is that fully degraded waste will have the least favorable properties, and will
2 eventually be similar to granular materials whose properties can be measured today. The actual
3 properties of the waste over the 10,000-year regulatory period are unknown, since the physical
4 nature of the degraded waste is unknown. For these reasons, the parameter values assigned are
5 chosen to conservatively reflect measured properties of natural and constructed materials.

6 These properties are reasonable analogs for degraded waste. The effective shear resistance to
7 erosion used to calculate cavings is based on the erodibility of unconsolidated marine clays and
8 other easily eroded materials, and is considered to be near a physical limit for the minimum
9 value of this property (Parameter 58 in Attachment PAR to Appendix PA). The minimum
10 particle size used in the range for the spallings model is based on assuming an average pore
11 diameter consistent with an average waste permeability; this value is considered conservative
12 because waste will not have a uniform distribution of permeability. The larger particles will
13 define the more permeable pathways, along which most gas will flow during a spalling event,
14 and larger particles are less likely to spall than smaller particles. Last, the tensile strength of the
15 waste assigned for the spalling process is uncertain, ranging from 0.12 MPa to 0.17 MPa
16 (Hansen et al. 2003 - DRSPALL parameter report). Tensile strength was developed from
17 laboratory experiments on surrogate materials, which represented highly degraded residuals from
18 typical waste inventory. These values are felt to represent extreme, low-end tensile strengths
19 because they do not account for several strengthening mechanisms, such as MgO hydration and
20 halite precipitation/cementation (see Hansen et al. 1997).

21 The properties assumed for solid components in PA bound the least favorable behavior of these
22 components. Therefore, the PA analysis is not conditional on the quantities and kinds of solid
23 components that will be emplaced. Upper or lower limits are not necessary for solid waste
24 components because parameter values have been chosen conservatively.

25 **TRU WASTE-3.5 Water Components**

26 The amount of water emplaced with the waste can affect the rate at which gas is generated for a
27 short period soon after closure, but the small quantity of water acceptable in the waste is not a
28 concern for long-term performance. Consequently, there is no need to monitor water in the waste
29 for compliance with 40 CFR § 194.24(c). In fact, the quantity of water in the waste used for PA
30 calculations is greater than the Waste Acceptance Criteria allows, so the only limit on free water
31 content of the waste is set by the Waste Acceptance Criteria. The FEPs screening analysis
32 (Appendix PA, Attachment SCR) assumes no more than one percent volume of free liquid by
33 container.

34 **TRU WASTE-3.6 Humic Substances Components**

35 Humic substances are likely to be introduced into the repository as a component of wastes
36 containing soils or may form in situ from reactions involving microbial metabolites produced
37 during degradation of cellulosic materials. Humic substances will dissolve until a solubility limit
38 is reached. Dissolved humic substances are colloidal in nature and may complex radionuclides.
39 The radionuclide-bearing humic colloids may be transported in moving liquid and contribute to a
40 radionuclide release.

1 In PA, a steady-state concentration of humic colloids is assumed to exist in the repository during
2 the performance period. This concentration is not inventory limited; in other words, it is assumed
3 in PA that sufficient source materials exist that a constant concentration of humic colloids will be
4 present at all times. Because it is assumed that there is sufficient solid material present for a
5 steady-state concentration to exist at all times in the repository, PA results are not conditional on
6 the quantity of total humic substances present, and there is no need to provide a maximum or
7 minimum limit for the quantity of humic substances that may be emplaced in the repository.

8 **TRU WASTE-3.7 Nonferrous Metal Components**

9 The nonferrous metals present in the waste stream impact PA because they will dissolve and
10 bind to organic ligands, thereby reducing the impact of organic ligands on the solubility of
11 radionuclides (see Section TRU WASTE-2.4.1.3). No upper or lower limit need be established
12 for the quantity of non-ferrous metals beyond the present projection of the non-ferrous metals in
13 waste containers, and assay is not required for these metals.

14 **TRU WASTE-3.8 Organic Ligands Components**

15 The effects of organic ligands are directly considered in the CRA-2004 PA (Appendix PA,
16 Attachment SCR, Section SCR-6.5.6. Including acetate, citrate, EDTA, and oxalate in the FMT
17 speciation and solubility calculations had essentially no effect on An(IV) solubility, a modest
18 effect on An(III) solubility, and increase An(V) solubility significantly. However, base on the
19 effects of organics on the solubilities of the +III, +IV, and +V actinides, the overall effects on the
20 long-term performance of the repository are still negligible.. Therefore, no upper or lower limit
21 need be established for the quantity of organic ligands in the waste.

TRU WASTE-4.0 WASTE CHARACTERIZATION

The regulation 40 CFR § 194.24(c)(2) and (3) require that the DOE identify and describe the methods used to quantify the limits presented in Section TRU WASTE-3.0 for the waste components identified as potentially significant to the long-term performance of the disposal system. These waste components are radionuclides, free water, ferrous metals, nonferrous metals and CPR materials. The repository limits and the associated approved characterization methods for each of these components is summarized below:

- Although Section TRU WASTE-3.0 does not specify limiting values for the activities and masses of specific radionuclides, the cumulative total activities of the specified radionuclides (^{241}Am , ^{238}Pu , ^{239}Pu , ^{240}Pu , ^{242}Pu , ^{233}U , ^{234}U , ^{238}U , ^{90}Sr , and ^{137}Cs) must be reported and tracked to ensure that the total radionuclide inventory of the repository is consistent with the levels used for the current PA. The presence of these specific radionuclides, in terms of activities and masses, including associated total measurement uncertainties, is determined from acceptable knowledge (AK) and radioassay.
- The acceptance criterion specified in the CH-WAC states that there shall be no more than 2.5 cm (1 in) in the bottom of internal containers and the total residual liquid in any payload container shall not exceed 1% by volume of that payload container. The FEPs screening analysis (Appendix PA, Attachment SCR) assumes no more than one percent volume of free liquid by container. Therefore, the repository limit for free liquid is a maximum of $1,684 \text{ m}^3$ (1% by volume liquid per container \times the expected number of containers). The qualitative methodologies of AK, radiography, or visual examination, used either singly or in combination, verify adherence to the compliance limits.
- The repository limit for ferrous metals is a minimum of $2.0 \times 10^7 \text{ kg}$. This limit will be met in the total repository inventory by the quantity of ferrous metals that make up the payload containers alone; thus, the number and type of payload containers emplaced in the repository are tracked.
- The repository limit for nonferrous metals is a minimum of $2.0 \times 10^3 \text{ kg}$ (which was already met with the waste emplaced in the repository as of September 30, 2002). This limit will be met in the total repository inventory by the quantity of nonferrous metals that make up the payload containers alone; thus the number and type of payload containers emplaced in the repository are tracked.
- The repository limit for CPR materials is a maximum of $2.2 \times 10^7 \text{ kg}$. The TRU waste sites are required to determine the CPR material weights in the waste by AK supplemented by radiography and/or visual examination.

The methods used to quantify the above waste components are summarized below with more detailed descriptions in the following documents:

- Contact-Handled Transuranic Waste Acceptance Criteria (CH-WAC), Appendix A (DOE 2002a)

- WIPP Hazardous Waste Permit, Waste Facility Analysis Plan (WAP), Attachments B through B6 (DOE 2003a)

This section does not repeat the provisions of the WAP and the CH-WAC. References to the WAP and WAC will direct the reader to more detailed information on the CH-TRU waste characterization methods, where appropriate. The RH-TRU waste characterization methods are pending EPA approval and are not discussed here. Information on the proposed RH-TRU waste characterization program is contained in DOE (2002b).

TRU WASTE-4.1 Acceptable Knowledge

AK is the compilation of process knowledge and available existing information to characterize a TRU waste stream. AK includes information regarding the physical form of the waste, the base materials composing the waste, and the process that generates the waste. AK is discussed in the WAP and CH-WAC. AK discussions in the WAP delineate waste streams and characterize the chemical and physical properties of the waste, such as the amount of free liquid and waste material parameters. The CH-WAC discusses AK characterization requirements for the nuclear properties (i.e., as radionuclide activity and the distribution of the 10 WIPP-tracked isotopes) that each TRU waste site must obtain.

TRU WASTE-4.2 Radioassay

The EPA requires radiological characterization data to track the WIPP radionuclide inventory, by isotopic distribution and activity, of the ten WIPP-tracked radionuclides (^{241}Am , ^{238}Pu , ^{239}Pu , ^{240}Pu , ^{242}Pu , ^{233}U , ^{234}U , ^{238}U , ^{90}Sr , and ^{137}Cs). This requisite data is derived from AK, radioassay or both. DOE-approved radioassay techniques are discussed in Attachment A of the CH-WAC (DOE 2002a).

Nondestructive analysis is a noninvasive radioassay method allowing the radiological characteristics of a waste container to be determined without altering its physical or chemical form. A variety of nondestructive assay (NDA) methodologies are effective in meeting the requirements of the CH-WAC.

Radiochemical analysis, another approved radioassay method, is more time consuming and has an inherently higher risk of exposure to the personnel performing the assay. Exposure to radiation is minimized when NDA methods are employed in place of intrusive measurement methods, making NDA the preferred choice for waste assay.

TRU WASTE-4.3 Radiography

Radiography is a nondestructive technique that involves x-ray examination of waste containers to identify and verify waste container contents; specifically to verify the physical form of the waste to identify and assess the quantity of CPR materials.

TRU WASTE-4.4 Visual Examination

Visual examination consists of an evaluation of the waste container contents. It verifies and augments the description of waste container contents derived from AK or radiography by

1 opening the container and physically inspecting the contents. TRU waste sites may opt to
2 substitute visual examination in place of radiography as long as all waste containers are
3 inspected.

1 **TRU WASTE-5.0 WIPP WASTE INFORMATION SYSTEM**

2 All TRU waste sites planning to ship TRU waste to WIPP will supply the required
3 characterization data to the computerized data management system known as the WWIS. The
4 system continues to be used to gather, store, and process information pertaining to TRU waste
5 destined for or disposed at the WIPP and includes automatic certification-based compliance limit
6 and quality assurance checks. The WWIS is designed, maintained and operated in compliance
7 with nuclear quality assurance requirements for computer software for nuclear facility
8 applications.

9 To ensure compliance with the data requirements, CBFO reviews the data package for each
10 container of each shipment for completeness and adequacy before notifying the shipping site of
11 acceptance. Thus, the WWIS becomes an integral part of the waste information screening
12 process. DOE provides EPA with an annual report using information generated from the WWIS
13 on waste parameters as identified in Table TRU WASTE-16.

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