Class 1 Permit Modification Notification

Revise Panel Figures To Include Panel 5 Revise Firewater Distribution System Figures

> Waste Isolation Pilot Plant Carlsbad, New Mexico

WIPP Permit Number NM4890139088-TSDF

January 2009

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Acronyms and Abbreviations

CBFO CFR	Carlsbad Field Office Code of Federal Regulations
DOE	Department of Energy
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
Permit	Hazardous Waste Facility Permit
PIV	Post Indicator Valve
PMN	Permit Modification Notification
RCRA	Resource Conservation and Recovery Act
RH	Remote-Handled
TSDF	Treatment, Storage and Disposal Facility
WIPP	Waste Isolation Pilot Plant
WTS	Washington TRU Solutions LLC

Overview of the Permit Modification Notification

This document contains a Class 1 Permit Modification Notification (**PMN**) to the Permit at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF hereinafter referred to as the Permit.

This PMN is being submitted by the U.S. Department of Energy (**DOE**) and Washington TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with Permit, Condition I.B.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (40 **CFR**) §270.42(a)). The PMN in this document is necessary to notify the New Mexico Environment Department (**NMED**) of some changes that impact the WIPP. These changes do not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the WIPP Permit and any related supporting documents are provided in this PMN. The modifications to the text of the WIPP Permit has been identified using red text and <u>double underline</u>, and a strikeout font for deleted information. All direct quotations are indicated by italicized text.

Attachment A

Description of the Class 1 Permit Modification Notification

Affected Permit Section	Change Description	Category	Attachment A Page #
1. Figures F-3, F-5, F-9, I-1, I-6, I2-1, M2-1, N-1 and O3-2	Revise figures to indicate that panel 5 has been certified and is approved for use.	A.1	A-3
2. Figures F-6, F-10, F-10a, F-11, F-11a	Revise figures to indicate that a new post indicator valve (PIV) has been installed in the firewater line serving the Remote-Handled (RH) Bay of the Waste Handling Building (WHB).	A.1	A-4

Item 1

Description:

Revise figures in the Permit to indicate that Panel 5 has been approved by the NMED. The designation on the figures is being changed from "planned" to "existing" hazardous waste disposal unit (HWDU).

Basis:

The change is classified as "Administrative and informational change" and is therefore a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, A.1).

Discussion:

On December 17, 2008, the Permittees were notified by the NMED that Panel 5 had been constructed in compliance with the requirements in the Permit. Panel 5 has been certified in accordance with the Permit Condition I.E.II and is now available for waste emplacement. Figures F-3, F-5, F-9, I-1, I-6, I2-1, M2-1, N-1 and O3-2 have been revised to show that Panel 5 is now approved for waste emplacement. The change removes the "dashed" lines and replaces them with "solid" lines in order to change the designation from "planned" HWDU to "existing" HWDU.

Revised Permit Text:

a.1. Figures F-3, F-5, F-9, I-1, I-6, I2-1, M2-1, N-1 and O3-2 are included in Attachment B.

Item 2

Description:

Revise figures in the Permit to include a new PIV that has been added to the fire water distribution system that serves the RH Bay in the WHB.

Basis:

The change is classified as "Administrative and informational change" and is therefore a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, A.1).

Discussion:

On November 20, 2008, the Permittees submitted a Notification of Planned Change to the Permitted Facility. In this Notification it was determined that a Class 1 Permit Notification would be required to revise Figures F-6, F-10, F-10a, F-11 and F-11a when the construction activities and certification were completed. The upgrade of the new fire water distribution system and the certification by a registered Professional Engineer is now complete. This modification updates all five figures to reflect the addition of the new PIV per the Notification of Planned Change.

Included with Figure F-6 are two figures. One is an expanded view of the affected area of the figure with a "cloud" around the new PIV for ease in determining where the change has been made. The other is a "clean" figure for insertion in the revised Permit. A "clouded" figure is not necessary for the remainder of the figures.

Revised Permit Text:

a.1. Attachment F, Figure F-6, F-10, F-10a, F-11 and F-11a are included in Attachment B.

Attachment B

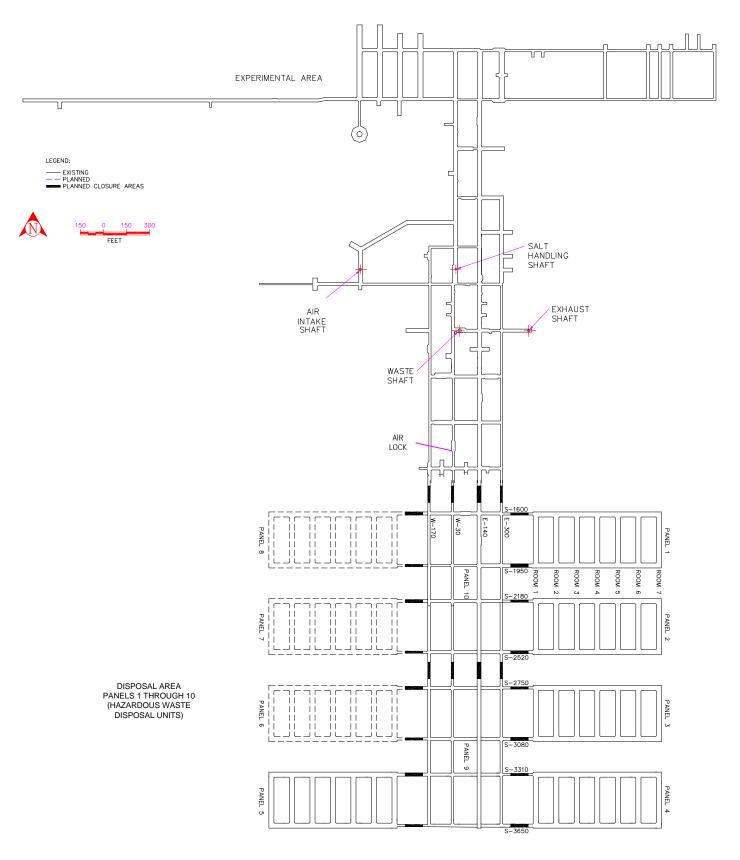


Figure F-3 WIPP Underground Facilities

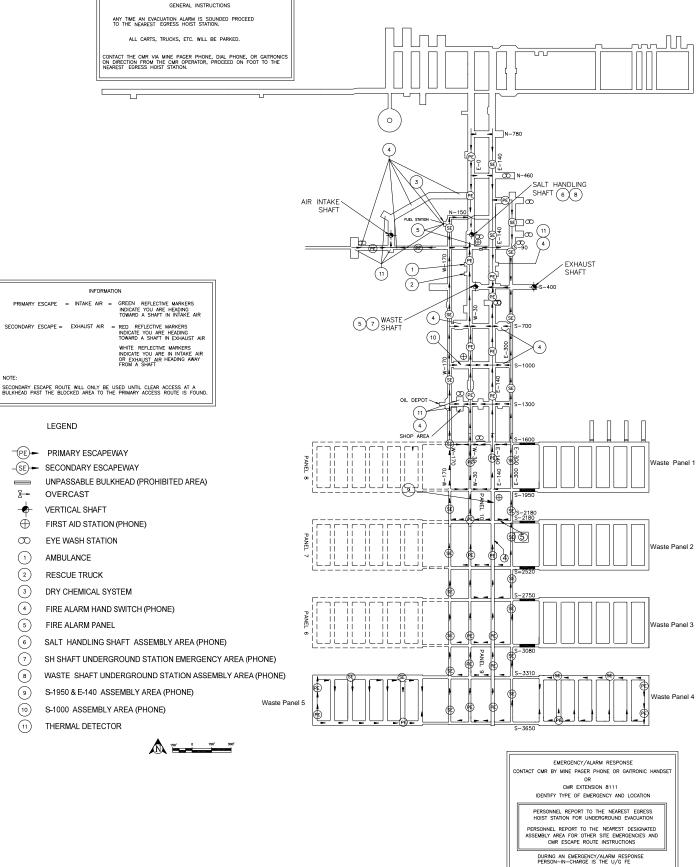


Figure F-5 Underground Emergency Equipment Locations and Underground Evacuation Routes

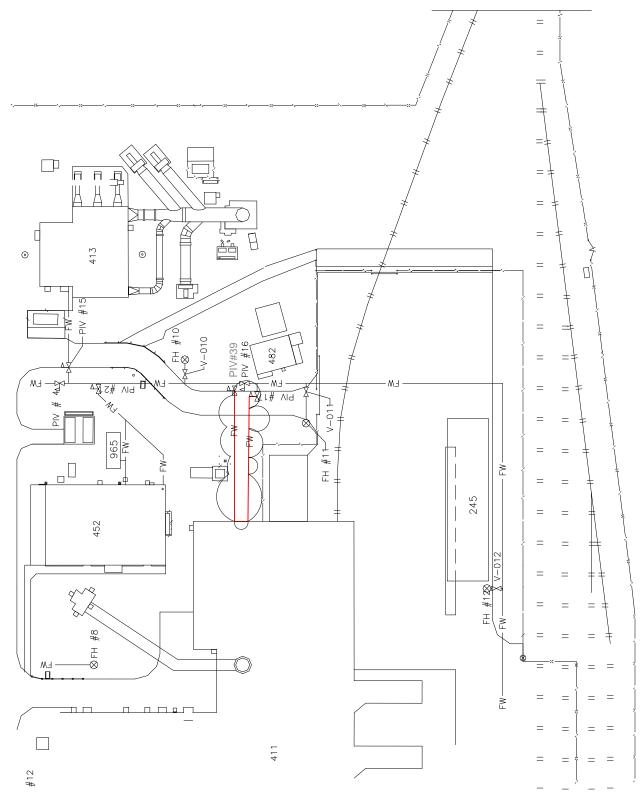


Figure F-6 Fire Water Distribution (cut away/clouded view) (For Informational Purposes Only)

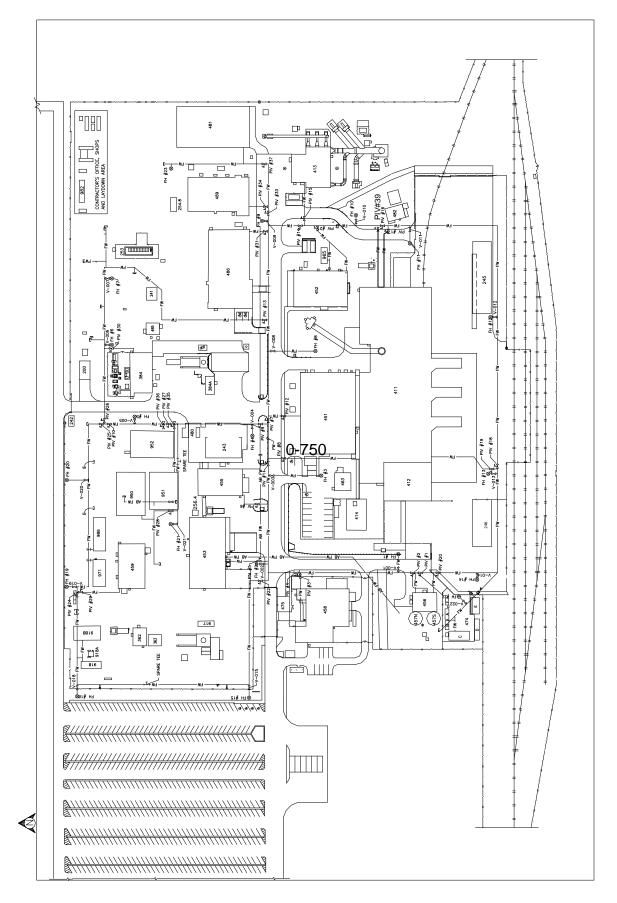


Figure F-6 Fire-Water Distribution System

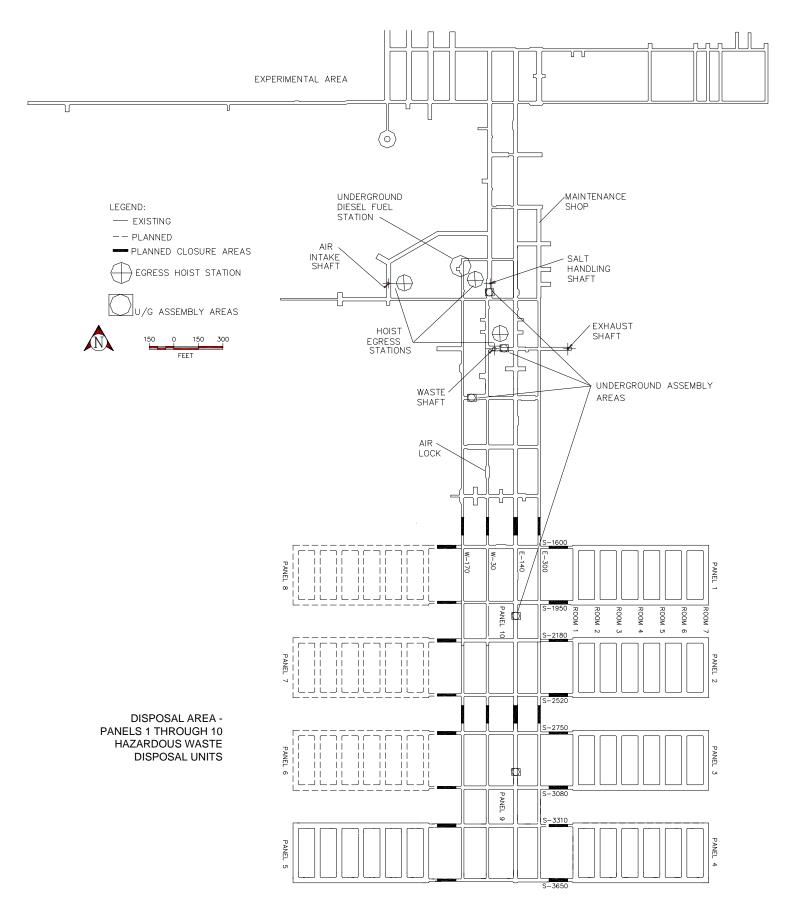


Figure F-9 Designated Underground Assembly Areas

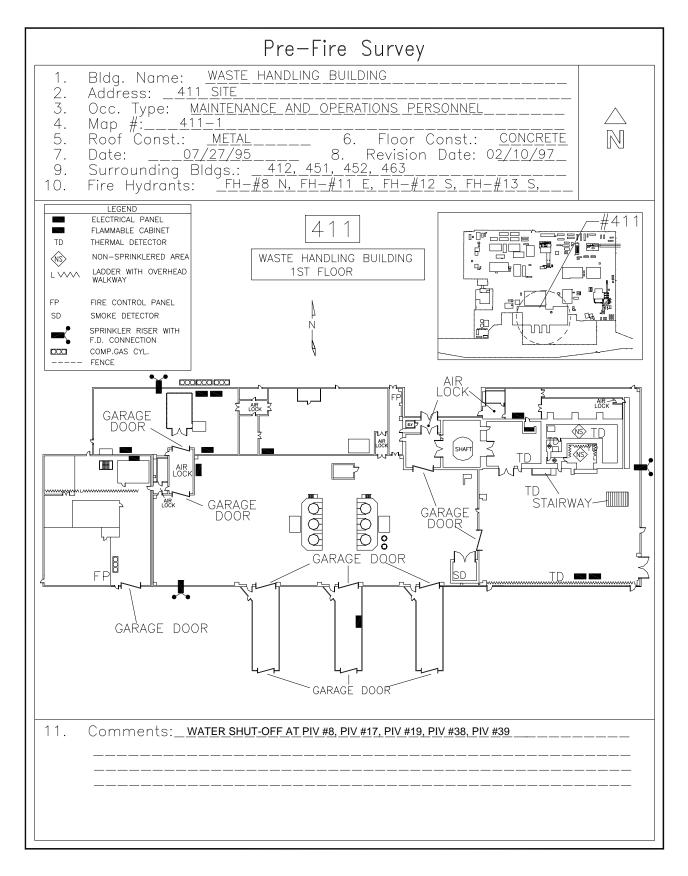


Figure F-10 Waste Handling Building Pre-Fire Survey (First Floor)

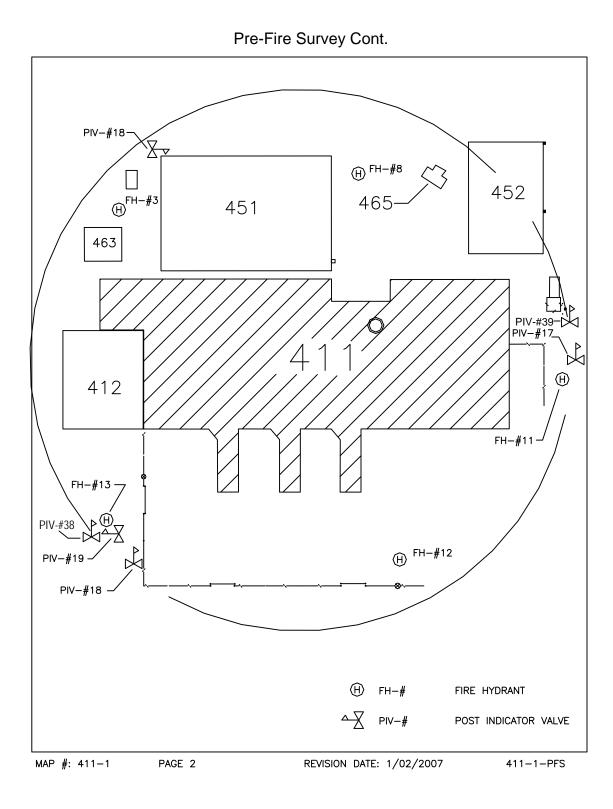


Figure F-10a Waste Handling Building Pre-Fire Survey (First Floor)

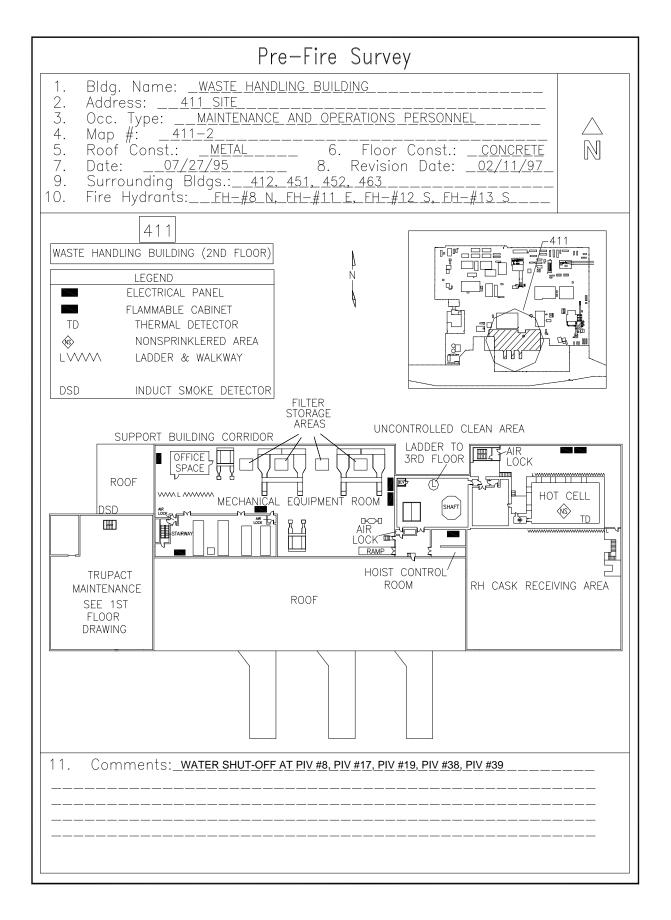


Figure F-11 Waste Handling Building Pre-Fire Survey (Second Floor)

Pre-Fire Survey Cont.

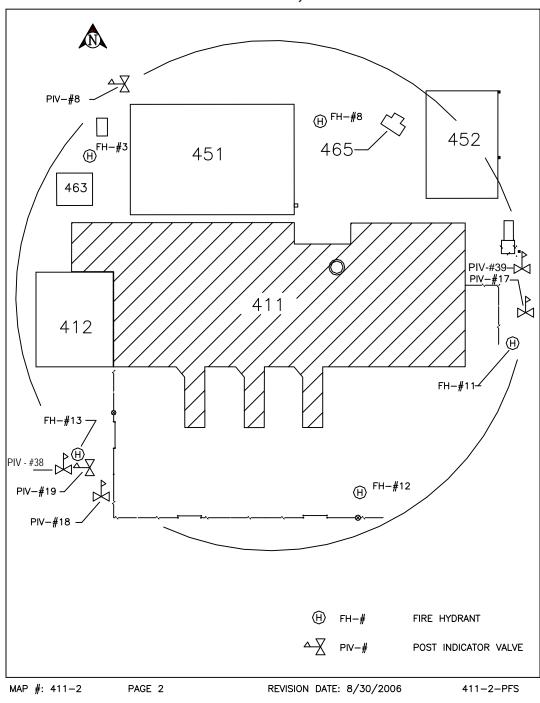


Figure F-11a Waste Handling Building Pre-Fire Survey (Second Floor)

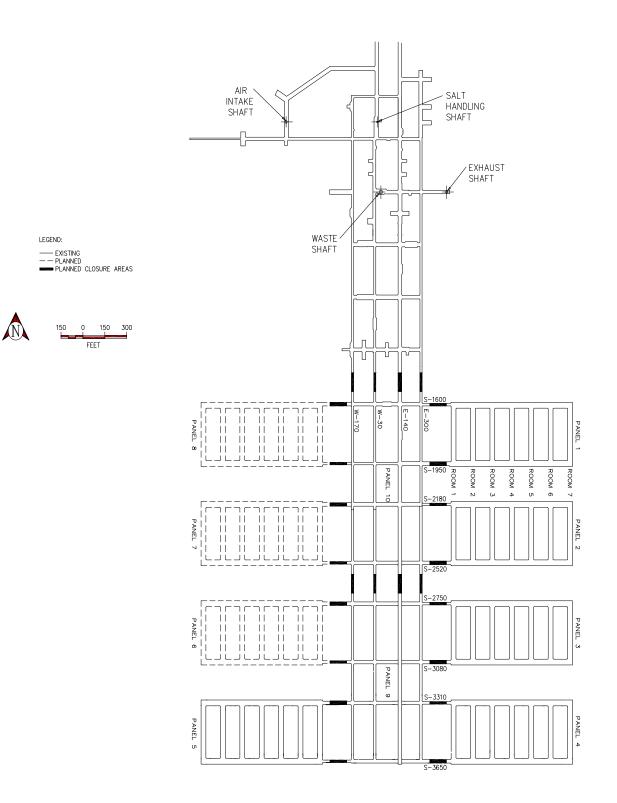


Figure I-1 Location of Underground HWDUs and Anticipated Closure Locations

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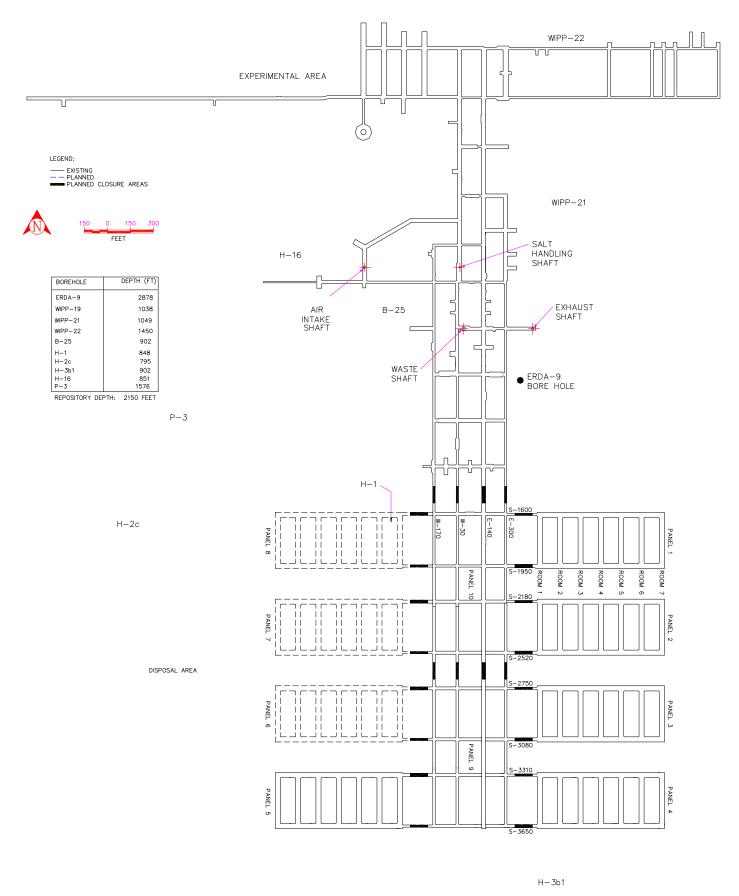


Figure I-6 Approximate Location of Boreholes in Relation to the WIPP Underground

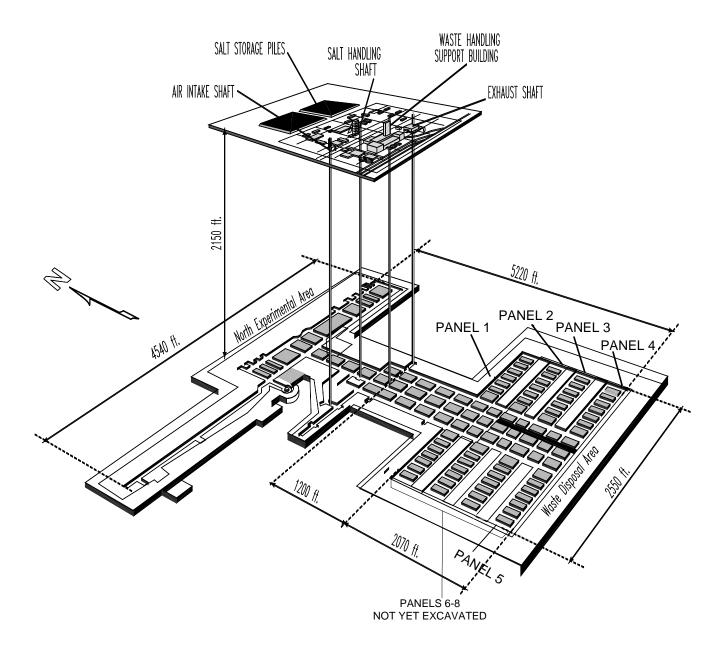


Figure I2-1 View of the WIPP Underground Facility

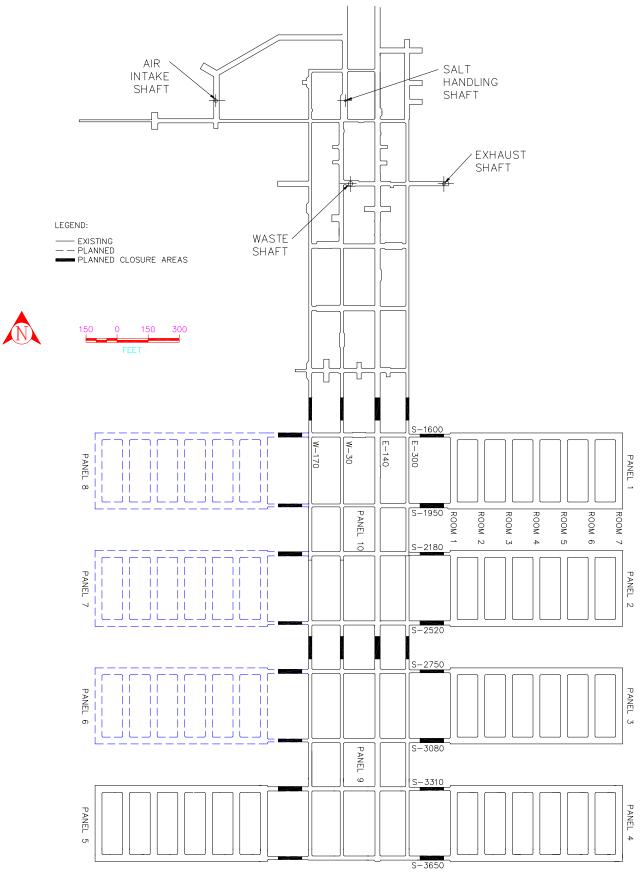


Figure M2-1 Repository Horizon

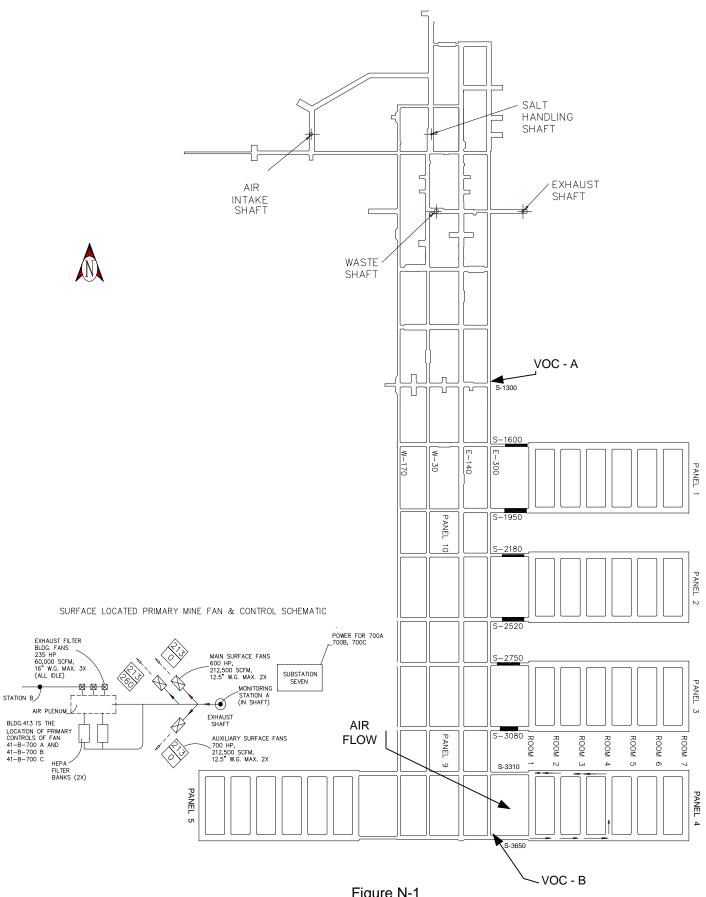


Figure N-1 Panel Flow Area

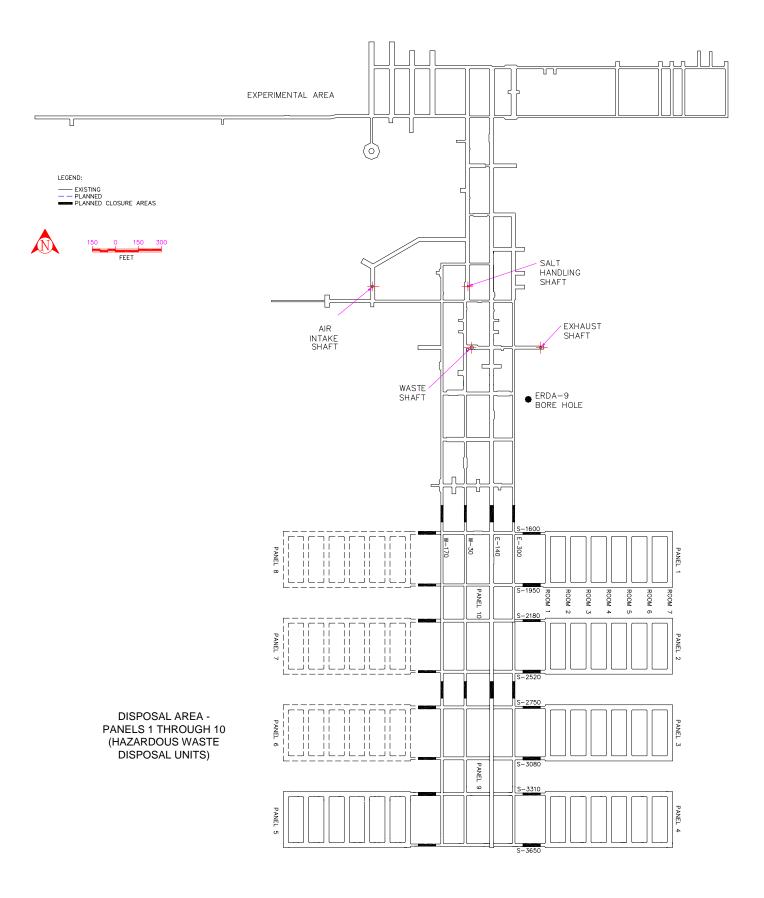


Figure 03-2 Repository Horizon