

Summary of Proposed Changes

The following narrative provides a summary of the proposed changes in WIPP Hazardous Waste Facility Permit Renewal Application:

Global Changes

The Renewal Application contains corrections of typographical and grammatical errors, editorial changes, and corrections and updates to reference identification information. These types of changes appear in virtually every chapter and appendix in the Renewal Application and will not be identified in the specific summaries of Chapters, Appendices and Addenda noted below.

Chapter A, General Facility Description and Process Information

New and revised information is provided regarding the zip code change for the WIPP phone number and information to authorize the disposal of TRU waste in Panel 8.

Waste Analysis Plan Chapter B through B7

Revised the Waste Analysis Plan as indicated in redline/strikeout text.

Addendum B1

The addendum presents a discussion of using “totals” sampling methodology versus the toxicity characteristic leaching procedure (TCLP) sampling methodology.

Addendum B2

The addendum presents the analysis of compatibility of wastes, containers, and repository materials.

Chapter C, Security

No change

Chapter D, Inspection Schedule, Process, and Forms

No change

Appendix D1, Inspection Sheets, Logs, and Instruction Sheets for Systems/Equipment Requiring Inspection

No change

Chapter E, Preparedness and Prevention

No change

Chapter F, RCRA Contingency Plan

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No change

Chapter G, Traffic Patterns

No change

Chapter H, Personnel Training

No change

Appendix H1, RCRA Hazardous Waste Management Job Titles and Descriptions

Revised to correspond with some changes made in the Renewal Application Appendix B7, *Permittee Level TRU Waste Confirmation Process*.

Appendix H2, Training Course and Qualification Card Outlines

Revised to correspond with some changes made in the Renewal Application Appendix B7, *Permittee Level TRU Waste Confirmation Process*.

Chapter I, Closure Plan

Revised information is provided to reflect TRU waste disposal in Panel 8. The term “certified characterization program” is used to clarify the organization responsible for performing characterization activities in accordance with the WIPP Waste Analysis Plan. Chapter I also notes that the re-evaluation of the 300-year performance demonstration is provided as Addendum N1 of Chapter N in the Renewal Application. Table I-2, *Anticipated Overall Schedule for Closure Activities*, specifically identifies the Waste Handling Building and Parking Area Unit.

Appendix I2, Detailed Design Report for an Operation Phase Panel Closure System

No change

Appendix I1G, Technical Specifications, Panel Closure System, Waste Isolation Pilot Plant, Carlsbad, New Mexico

No change

Appendix I1H, Design Drawings, Panel Closure System, Waste Isolation Pilot Plant, Carlsbad, New Mexico

No change

Appendix I2, Waste Isolation Pilot Plant, Shaft Sealing System, Compliance Submittal Design Report

Deleted historical and superfluous information, such as the report abstract and acknowledgements. Information regarding the site geologic, hydrologic, and geochemical setting was consolidated and referenced. Updated the identification of the anthropogenic water lens at the Santa Rosa/Dewey Lake contact and referenced the Renewal Application Addendum L1-2a(3)(b)(ii) to find the full information.

Appendix I2B, Shaft Sealing Construction Procedures, Shaft Sealing System, Compliance Submittal Design Report

No change

Appendix I2E, Design Drawings, Shaft Sealing System, Compliance Submittal Design Report

No change

Appendix I3, Radiological Surveys to Indicate Potential Hazardous Waste Releases

No change

Chapter J, Post Closure Plan

No change

Appendix J1, Active Institutional Controls during Post-Closure

No change

Chapter K, Reserved

Chapter L, WIPP Groundwater Detection Monitoring Program Plan

Historical and descriptive text has been deleted. However, Addendum L1 (Site Characterization) to Chapter L has been added to present information regarding investigations made in site characterization since the original 1997 Part B submittal. These investigations have made a significant contribution to the understanding of the large variability observed for Culebra transmissivity.

Chapter M

No change

Appendix M1

Added Table M1-5, *Parking Area Unit Storage Capacities*. Clarified container accountability practices upon receipt.

Appendix M2

Revised verbiage regarding for including Panel 8 for disposal of TRU mixed waste. Accordingly, Panel 8 CH and RH TRU waste disposal capacities were added to the appropriate sections/tables. Made a statement that backfill may also be emplaced on racks which allow for orderly stacking. Included text regarding nominal dimensions for

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possible Panel 9 and 10 access/ventilation drifts. Called out that the WIPP Mine Ventilation Rate Monitoring Plan is Chapter Q in the Renewal Application.

Appendix M3

No Change

Chapter N

Revised verbiage regarding for including Panel 8 for disposal of TRU mixed waste. Added Tables identifying VOC Concentrations of Concern, VOC Room-Based Limits, Action Levels for Disposal Room Monitoring as previous text reference Permit conditions in the modules. The Renewal Application contains no modules as the regulators write the permit modules.

Appendix N1

No change.

Addendum N1

This addendum presents the 300-Year Performance Demonstration Re-Evaluation. This document reaffirms that non hazardous waste constituents migrate from the repository for a period of 300-years.

Chapter O

Reserved

Chapter P

Reformatted to use less space.

Chapter Q

Included the WIPP Mine Ventilation Monitoring Plan