

Attachment I		
Section	Change	Explanation of Change
I	Table of Contents	No changes have been made.
Introduction	This Permit Attachment ... contingency closure. Contingency closure defers the final closure of waste management facilities such as the Waste Handling Building Container Storage Unit (WHB Unit), <u>Staging Areas</u> , the conveyances, the shafts, and the haulage ways because these will be needed to continue operations with non-mixed Transuranic (TRU) waste. ...	This section has been revised to reflect that staging areas must also undergo closure.
I-1	This closure plan601). The WIPP surface facilities, including Waste Handling Building Container Storage Unit, <u>the Waste Handling Building Staging Areas</u> , <u>the TMF Staging Area</u> , <u>the Parking Area Staging Area</u> and the Parking Area Container Storage Unit, will be closed in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.178). For the purposes of this Closure Plan, final facility closure is defined as closure that will occur when all waste disposal areas are filled or when the WIPP achieves its capacity of 6.2 million cubic feet (ft ³) (175,600 cubic meters (m ³)) of TRU <u>mixed</u> waste. ...	This section has been revised to reflect that staging areas must also undergo closure.
I-1a	Closure of the permitted container storage units (the Waste Handling Building Unit and Parking Area Unit) <u>and Staging Areas</u> will be accomplished by removing all waste and waste residues. ... Once the container storage <u>and staging areas/</u> units are decontaminated and certified by the Permittees to be clean, no further maintenance is required. ...	This section has been revised to reflect that staging areas must also undergo closure.

Waste Isolation Pilot Plant
Class 3 Permit Modification Request
June 2005

Section	Change	Explanation of Change
I-1c	<p>The WIPP will ... decontamination operations. Maximum waste volumes in the disposal panels are calculated as follows: for <u>contact-handled (CH) TRU mixed waste, assuming</u> 100 percent 55-gallon drums--11,502 7-packs consisting of 80,514 drums and 591,800 ft³ (16,760 m³) of waste; for 100 percent standard waste boxes (SWB)--11,580 SWBs and 767,750 ft³ (21,740 m³) of waste; <u>and for remote-handled (RH) TRU mixed waste: 730 canisters containing 22,976 ft³ (650.6 m³) of waste for each panel except Panels 1 and 2, which contains no RH TRU mixed waste.</u> Since the <u>CH TRU mixed waste</u> can arrive in any combination of 7-packs, 4-packs, 3-packs, SWBs and TDOPs and SWBs, a fixed volume is not set for each panel. For <u>closure</u> planning purposes, a maximum achievable volume <u>is used: of This equates to 662,400 ft³ (18,750 m³) of contact handled (CH) TRU of mixed waste</u> per panel <u>is used.</u> 81,000 containers were assumed in design calculations since, for air dispersion modeling, it is important to maximize the number of container vents through which volatile organic compounds (VOC) may be released. In reality, using the 40 percent-60-percent mix, there would be only 51,000 containers in a panel, containing 56,000 vents (2 vents per SWB).</p> <p>...</p> <p>The maximum ... same time. Underground HWDUs in which disposal has been completed (i.e., in which CH <u>and RH</u> TRU mixed waste emplacement activities have ceased) will undergo panel closure.</p>	<p>This section has been revised to incorporate the volumes of RH TRU <u>mixed</u> waste which may be placed in the disposal panels.</p>
I-1d(1)	<p>The anticipated schedule ... the panel. The following assumptions are made in estimating the time that closure will be initiated at each underground HWDU: waste operations are assumed to begin in July 1998 for planning purposes; throughput for CH waste is 784 drums per week (7 pallets per day, 4 days per week, 28 drums per pallet); and the capacity of a panel is 81,000 drums; <u>RH TRU mixed waste emplacement does not impede CH TRU mixed waste throughput....</u></p>	<p>This section has been revised to indicate that the addition of RH TRU <u>mixed</u> waste will not impede the placement of CH TRU waste.</p>
I-1e(2)(b)	<p>The procedures ... WHB. TRU mixed waste is shipped to the WIPP facility in approved shipping containers (e.g. Contact- or <u>Remote</u>-Handled Packages) that are not opened until they are inside the WHB. ...</p>	<p>This section adds the term Remote Handled to the closure plan.</p>

Waste Isolation Pilot Plant
Class 3 Permit Modification Request
June 2005

Section	Change	Explanation of Change
Table I3-3	Added Table I3-3	This new table has been added to show the radiological surveys to be conducted for RH TRU mixed waste processing.