
**Title 40 CFR Part 191
Subparts B and C
Compliance Recertification Application 2014
for the
Waste Isolation Pilot Plant**

**Appendix MASS-2014
Performance Assessment
Modeling Assumptions**



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

**Carlsbad Field Office
Carlsbad, New Mexico**

Compliance Recertification Application 2014
Appendix MASS

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Acronyms and Abbreviations

An	actinide
CCA	Compliance Certification Application
CCDF	complementary cumulative distribution function
CFR	Code of Federal Regulations
CH-TRU	contact-handled transuranic
cm	centimeters
CPR	cellulosic, plastic, and rubber
CRA	Compliance Recertification Application
DBR	direct brine release
DOE	U.S. Department of Energy
DRZ	disturbed rock zone
EPA	U.S. Environmental Protection Agency
FEP	feature, event, and process
ft	foot
in.	inch
K_d	Culebra matrix partition coefficient
km	kilometer
lb	pound
LHS	Latin hypercube sample
m	meter
MB	marker bed
MPa	megapascals
NIST	National Institute of Standards and Technology
OS	operating system
PA	performance assessment
PABC	Performance Assessment Baseline Calculation
PAIR	Performance Assessment Inventory Report
PAVT	Performance Assessment Verification Test
PC	personal computer
PCS	panel closure system
pH	measure of the acidity or alkalinity of a solution

PR	productivity ratio
QA	quality assurance
RH-TRU	remote-handled transuranic
ROM	run-of-mine
ROMPCS	Run-of-Mine Panel Closure System
RoR	rest of repository
SMC	Salado Mass Concrete
T field	transmissivity field
TRU	transuranic
WIPP	Waste Isolation Pilot Plant

Elements and Chemical Compounds

Am	americium
CaCO ₃	calcite
CH ₄	methane
Cm	curium
CO ₂	carbon dioxide
H ₂	hydrogen
H ₂ S	hydrogen sulfide
Mg(OH) ₂	brucite, magnesium hydroxide
Mg ₅ (CO ₃) ₄ (OH) ₂ ·4H ₂ O	hydromagnesite
MgO	magnesium oxide
Np	neptunium
Pu	plutonium
Th	thorium
U	uranium

1 **MASS-1.0 Introduction**

2 This appendix presents supplementary information regarding the assumptions, simplifications,
3 and approximations used in models that underlay the 2014 Compliance Recertification
4 Application (CRA-2014) performance assessment (PA) of the Waste Isolation Pilot Plant
5 (WIPP). The PA executed in support of the third WIPP recertification is denoted as the CRA-
6 2014 PA. Within this appendix, relevant issues in the formulation or development of the various
7 types of models (for example, conceptual, mathematical, numerical, or computer code) used for
8 the topic under consideration in each section are discussed, and references to relevant historical
9 information are included where appropriate. This appendix references the Compliance
10 Certification Application (CCA) (U.S. DOE 1996), the 2004 Compliance Recertification
11 Application (CRA-2004) (U.S. DOE 2004), and the 2009 Compliance Recertification
12 Application (CRA-2009) (U.S. DOE 2009) when the information discussed has not changed
13 from past demonstrations of compliance with the U.S. Environmental Protection Agency's
14 (EPA's) disposal standards. Historical development of the WIPP conceptual models that led to
15 the PA used in the CCA is documented in the CCA, Appendix MASS, Section MASS-2.0.
16 Historical development of the modeling assumptions for the CRA-2004 PA is documented in
17 Appendix PA-2004, Attachment MASS. Finally, historical development of modeling
18 assumptions used in the CRA-2009 PA is documented in Appendix MASS-2009.

19 The technical baseline for the first WIPP recertification included modifications required by the
20 EPA during its review of the CRA-2004 PA (Cotsworth 2005). These modifications resulted in a
21 PA called the Performance Assessment Baseline Calculation (PABC), which was denoted as the
22 CRA-2004 PABC. The PA executed in support of the second recertification, the CRA-2009 PA,
23 included a number of technical changes and corrections, as well as updates to parameters and
24 improvements to the PA computer codes (Clayton et al. 2008). To incorporate additional
25 information received after the CRA-2009 PA was completed but before the submittal of the
26 CRA-2009, the EPA requested an additional PA be undertaken, referred to as the CRA-2009
27 PABC (Clayton et al. 2010), which included updated information (Cotsworth 2009).

28 Several changes are incorporated in the CRA-2014 PA relative to the CRA-2009. The
29 modifications included in the CRA-2014 PA include repository planned changes, parameter
30 updates, and refinements to PA implementation. Section MASS-2.0 contains a summary of
31 changes in PA since the CRA-2009. Section MASS-3.0 includes a discussion of general
32 modeling assumptions applicable to the disposal system as a whole, including a table of
33 assumptions made in PA models, with cross-references. The remainder of this appendix
34 discusses assumptions specific to the conceptual models used in the CRA-2014 PA.

35

1 **MASS-2.0 Summary of Changes in Performance Assessment**

2 Since the CCA, there have been changes to a number of the conceptual models and processes
3 important in assessing the performance of the WIPP. Changes for the second recertification
4 were primarily discussed in Appendix PA-2009 and Appendix MASS-2009. Other
5 recertification-related, EPA-mandated changes were documented in the CRA-2009 PABC
6 (Clayton et al. 2010). The CRA-2009 PABC is the current technical baseline used to
7 demonstrate compliance with regulatory disposal standards. Since the CRA-2009 PABC,
8 ongoing confirmatory experiments, monitoring results, and operational practices have generated
9 information relevant to the features, events, and processes (FEPs), modeling assumptions, and
10 conceptual models for PA, and provided additional support to the conceptual basis of PA.
11 Appendix MASS-2014 includes the PA implications of these ongoing investigations and results,
12 which are incorporated in the CRA-2014 PA. Changes in this PA include the following:

- 13 1. Reassessment of FEPs
- 14 2. Results of compliance monitoring
- 15 3. Results of experimental activities
- 16 4. Assessment of model and systems changes and updates
- 17 5. Incorporation of changes included in the CRA-2009 PABC, such as
18 Changes to matrix partition coefficient parameters
19 Updated Culebra transmissivity fields (T fields)
- 20 6. Incorporation of CRA-2014 changes, including
 - 21 A. Replacement of the "Option D" WIPP panel closure system (PCS) with a newly
22 designed Run-of-Mine Panel Closure System (ROMPCS)
 - 23 B. Inclusion of additional mined volume in the repository north end
 - 24 C. An update to the probability that a drilling intrusion into a repository excavated region
25 will result in a pressurized brine encounter
 - 26 D. Refinement to the inundated corrosion rate of steel in the absence of carbon dioxide
27 (CO₂)
 - 28 E. Refinement to the effective shear strength of WIPP waste
 - 29 F. Inventory updates
 - 30 G. Updated drilling rate
 - 31 H. Implementation of a more detailed repository water balance that includes magnesium
32 oxide (MgO) hydration
 - 33 I. Calculation of radionuclide concentration in brine as a function of the brine volume
34 present in the waste panel
 - 35 J. Updates to radionuclide solubilities and their associated uncertainties
 - 36 K. Updated colloid enhancement parameters
- 37 7. Operational considerations

38 A summary of each change is presented in this section. References to appropriate sections of
39 this appendix are provided for those changes that impact modeling assumptions. In addition,
40 references are provided to other sections of the CRA-2014 where implementation of the changes
41 is discussed.

1 **MASS-2.1 FEPs Assessment**

2 In the WIPP PA methodology (see Appendix PA-2014, Section PA-2.3), FEPs are elements used
3 to develop the conceptual models and modeling assumptions represented in PA. The process
4 used to develop and screen FEPs is outlined in Appendix SCR-2014, Section SCR-2.0. For the
5 CRA-2014, a reassessment of the CRA-2009 baseline FEPs was conducted to determine whether
6 changes in WIPP activities and conditions affected the current FEP descriptions, bases, or
7 screening decisions. This assessment also determined whether additional or new FEPs should be
8 included in the CRA baseline. The reassessment results are documented in Appendix SCR-2014,
9 Section SCR-3.0 and Section 32 (Scope of Performance Assessment) of this application.
10 Changes to the baseline FEPs include updating screening arguments with new information that
11 has become available since the CRA-2009. No changes to PA implementation or modeling
12 assumptions were made as a result of the FEPs reassessment. No FEPs that were previously
13 screened out of PA calculations have been screened in for the CRA-2014 PA, and no FEPs that
14 were previously screened in have been screened out.

15 **MASS-2.2 Monitoring**

16 Monitoring activities have continued since the certification of the WIPP. These activities are
17 used to validate assumptions and PA parameters, and to detect substantial and detrimental
18 deviation from expected repository performance. Monitoring, as discussed here, applies to the
19 assurance requirement of 40 CFR § 191.14(b) (U.S. EPA 1993) and the monitoring criteria at 40
20 CFR § 194.42 (U.S. EPA 1996). Appendix MON-2014 details the monitoring program that
21 meets these requirements. The monitoring program was assessed to determine if the results
22 indicate that changes should be made to the monitoring program. The results did not indicate
23 that changes were required in the context of WIPP PA (Wagner 2011). The monitoring program
24 did, however, lead to a change in one monitored parameter used in PA: because of increased
25 drilling in the Delaware Basin, the drilling rate parameter value used in the CRA-2014 PA has
26 increased to comply with the requirements of 40 CFR § 194.33 (U.S. EPA 1996), as described in
27 Section 33 of this application. No changes to modeling assumptions are necessary to account for
28 this parameter change.

29 **MASS-2.3 Experimental Activities**

30 The EPA requires the recertification documentation to include an update of “additional analyses
31 and results of laboratory experiments conducted by the Department or its contractors as part of
32 the WIPP program” (40 CFR § 194.15(a)(3); see also 40 CFR § 194.15, U.S. EPA 1996). The
33 following sections discuss analyses and experiments conducted to support compliance
34 determinations. Only analyses with conclusions relevant to this recertification are discussed
35 here.

36 **MASS-2.3.1 Steel Corrosion Investigations**

37 A series of steel and lead corrosion experiments has been conducted under Test Plan TP 06-02,
38 *Iron and Lead Corrosion in WIPP-Relevant Conditions* (Wall and Enos 2006). The object of
39 these experiments has been to determine steel and lead corrosion rates under WIPP-relevant
40 conditions. A description of the experiments and the use of their results to determine a CRA-

1 2014 PA update to the inundated corrosion rate of steel in the absence of CO₂ are presented in
2 Roselle (Roselle 2013a).

3 **MASS-2.3.2 Waste Shear Strength Investigations**

4 WIPP PA includes scenarios in which human intrusion results in a borehole intersecting the
5 repository. During the intrusion, drilling mud flowing up the borehole will apply a
6 hydrodynamic shear stress on the borehole wall. Erosion of the wall material can occur if this
7 stress is high enough, resulting in a release of radionuclides being carried up the borehole with
8 the drilling mud. Experiments have been conducted to determine the erosive impact on surrogate
9 waste materials that were developed to represent WIPP waste that is 50%, 75%, and 100%
10 degraded by weight. A description of the experimental apparatus, the experiments conducted in
11 it, and conclusions to be drawn from those experiments are discussed in Herrick et al. (Herrick et
12 al. 2012). The use of the experimental results to determine an updated waste shear strength
13 parameter in the CRA-2014 PA is discussed in Herrick (Herrick 2013).

14 **MASS-2.3.3 Magnesium Oxide Investigations**

15 Experiments have been performed to support the implementation of MgO as an engineered
16 barrier. These experiments have characterized MgO and investigated the hydration and
17 carbonation of MgO to confirm its ability to sequester CO₂, buffer brine pH (the measure of the
18 acidity or alkalinity of a solution), and subsequently help establish low actinide solubilities in the
19 repository. These activities are described in detail in Appendix MgO-2014. The CRA-2014 PA
20 includes a more detailed repository water balance implementation that includes MgO hydration
21 (Appendix PA-2014, Section PA-4.2.5).

22 **MASS-2.3.4 Actinide Investigations**

23 The U.S. Department of Energy (DOE) has continued to investigate actinide (An) speciation and
24 solubilities since the certification of the WIPP. Since the CRA-2009, experiments to establish
25 the microbial ecology, evaluate biodegradation of chelating agents, establish the solubility of
26 thorium in WIPP brine, determine the effect of carbonate on uranium solubility, and assess the
27 intrinsic, mineral, and microbial colloid enhancement parameters were completed. The current
28 actinide experimental activities are described in Appendix SOTERM-2014, Section SOTERM-
29 3.0. The CRA-2014 PA uses the same actinide assumptions as the CRA-2009 PABC.

30 **MASS-2.4 Performance Assessment Models and Systems**

31 The DOE has maintained the computational platforms used to execute the WIPP PA modeling
32 codes. A small number of modeling tasks that feed into compliance calculations are performed
33 on desktop personal computer (PC) workstations running the Microsoft Windows 7[®] operating
34 system (OS), as well as PC-based workstations and clusters running the Red Hat Linux[®] OS.
35 The WIPP PA parameter database is hosted on a Sun Microsystems Solaris[®] server running
36 MySQL[®]. The vast majority of the WIPP PA modeling codes used directly in compliance
37 calculations are run on the WIPP PA Alpha Cluster composed of Hewlett-Packard (formerly
38 Compaq) AlphaServer[™] systems. AlphaServers[™] are built around the Alpha processor and run

1 the OpenVMST™ OS. The current hardware and software versions used in the CRA-2014 PA
 2 calculations are shown in Table MASS-1 and Table MASS-2.

3 Changes have been made to the systems used to perform WIPP PA in the CRA-2014. The PA
 4 parameter database has been updated since the CRA-2009 PABC. This change was necessary to
 5 reduce dependence on aging hardware and to increase PA capabilities. Several of the codes used
 6 in WIPP PA have been updated in order to add new capabilities. Codes PREBRAG Version 8.00
 7 and BRAGFLO Version 6.02 have been developed to incorporate the updated repository water
 8 balance implementation in the CRA-2014 PA that includes MgO hydration. Codes
 9 PRECCDFGF Version 2.0 and CCDFGF Version 6.0 have been developed to utilize
 10 radionuclide solubilities calculated over a range of brine volumes. All changes to systems used
 11 in WIPP PA are performed under the Carlsbad Field Office Quality Assurance (QA) Program
 12 implemented through the Quality Assurance Program Document (U.S. DOE 2010), and include
 13 testing, validation, and verification to ensure that there is no impact on PA implementation.

14 Outputs from previous certification PAs are again used in the CRA-2014 PA for those codes
 15 with unchanged input parameters. These outputs are identified in Long (Long 2013) and include
 16 the outputs of DRSPALL, MODFLOW, and SECOTP2D.

Table MASS-1. CRA-2014 PA Codes

Code	Version	Executable	Build Date
ALGEBRACDB	2.35	ALGEBRACDB_PA96.EXE	31-01-96
BRAGFLO	6.0	BRAGFLO_QB0600.EXE	12-02-07
BRAGFLO	6.02	BRAGFLO_QB0602.EXE	11-29-12
CCDFGF	6.0	CCDFGF_QC0600.EXE	02-23-10
CUTTINGS S	6.02	CUTTINGS_S_QA0602.EXE	09-06-05
EPAUNI	1.15A	EPAUNI_QA0115A.EXE	07-03-03
GENMESH	6.08	GM_PA96.EXE	31-01-96
ICSET	2.22	ICSET_PA96.EXE	01-02-96
LHS	2.42	LHS_QA0242.EXE	18-01-05
MATSET	9.20	MATSET_QA0920.EXE	04-01-12
NUTS	2.05C	NUTS_QA0205C.EXE	05-24-06
PANEL	4.03	PANEL_QA0403.EXE	04-25-05
PCCSRC	2.21	PCCSRC_PA96.EXE	05-23-96
POSTBRAG	4.00A	POSTBRAG_QA0400A.EXE	28-03-07
POSTLHS	4.07A	POSTLHS_QA0407A.EXE	25-04-05
PREBRAG	8.00	PREBRAG_QA0800.EXE	08-03-07
PREBRAG	8.02	PREBRAG_QA0802.EXE	11-29-12
PRECCDFGF	2.0	PRECCDFGF_QA0200.EXE	04-06-10
PRELHS	2.40	PRELHS_QA0240.EXE	04-01-12
RELATE	1.43	RELATE_PA96.EXE	06-03-96
STEPWISE	2.21	STEPWISE_PA96_2.EXE	02-12-96
SUMMARIZE	3.01	SUMMARIZE_QB0301.EXE	21-12-05

18

19

1

Table MASS-2. CRA-2014 PA Hardware

Node	Hardware Type	CPU	Operating System
CCR	HP AlphaServer™ ES45	Alpha EV68	Open VMS 8.2
TDN	HP AlphaServer™ ES45	Alpha EV68	Open VMS 8.2
BTO	HP AlphaServer™ ES45	Alpha EV68	Open VMS 8.2
CSN	HP AlphaServer™ ES45	Alpha EV68	Open VMS 8.2
GNR	HP AlphaServer™ ES47	Alpha EV7	Open VMS 8.2
MC5	HP AlphaServer™ ES47	Alpha EV7	Open VMS 8.2
TRS	HP AlphaServer™ ES47	Alpha EV7	Open VMS 8.2
TBB	HP AlphaServer™ ES47	Alpha EV7	Open VMS 8.2

2

3 MASS-2.5 CRA-2009 PABC Changes

4 As part of its review of the CRA-2009, the EPA requested changes to the CRA-2009 PA
5 (Cotsworth 2009). These changes included updates to the repository waste inventory, actinide
6 solubilities, Culebra transmissivity fields, drilling parameters, and matrix partition coefficients.
7 These changes were incorporated into the CRA-2009 PABC (Clayton et al. 2010). Repository
8 performance with these requested changes was subsequently assessed by the EPA, and the WIPP
9 was recertified in 2010 (U.S. EPA 2010a). The 2010 EPA recertification decision established
10 the CRA-2009 PABC as the certified WIPP technical baseline. Changes included in the CRA-
11 2009 PABC are shown in Table MASS-3.

12

Table MASS-3. Changes Incorporated in the CRA-2009 PABC

Changes Included in the 2009 Performance Assessment Baseline Calculation		
EPA-Mandated Change	Description of Change	Reference
Inventory	Updated inventory parameters	CRA-2009 PABC Summary (Clayton et al. 2010, Section 2.1) CRA-2009 PABC Inventory Screening Analysis (Fox, Clayton, and Kirchner 2009)
Solubility Parameters	Updated baseline solubility limits for inventory actinides	CRA-2009 PABC Summary (Clayton et al. 2010, Section 2.2)
Solubility Uncertainty Ranges	Updated uncertainty ranges for actinide solubility limits	CRA-2009 PABC Summary (Clayton et al. 2010, Section 2.2)
Culebra Transmissivity Fields	Updated to include additional Culebra transmissivity data sets	CRA-2009 PABC Summary (Clayton et al. 2010, Section 2.3) Appendix HYDRO-2014, Attachment TFIELD
Drilling Parameters	Updated to include additional Delaware Basin drilling data	CRA-2009 PABC Analysis Plan (Clayton 2009a, Section 2.1.4)
Matrix Partition Coefficients	Updated to account for higher organic ligand concentrations in the CRA-2009 PABC inventory	Justification of Updated K_d values (Clayton 2009b)

13

1 **MASS-2.6 CRA-2014 PA Changes**

2 A subset of the CRA-2009 PABC changes summarized in Table MASS-3 is also included in the
3 CRA-2014 PA. The CRA-2014 PA uses the same Culebra transmissivity fields and matrix
4 partition coefficients as were used in the CRA-2009 PABC. A number of additional changes are
5 implemented in the CRA-2014 PA relative to the CRA-2009 PABC. These changes are
6 discussed below and summarized in Table MASS-4.

7 **MASS-2.6.1 Conceptual Model Changes**

8 The CRA-2014 PA uses the same conceptual models as were used in the CRA-2009 PABC. No
9 changes were made to the conceptual models used in the CRA-2009 PABC.

10 **MASS-2.6.2 Replacement of Option D with the ROMPCS**

11 The WIPP waste panel closures comprise a feature of the repository that has been represented in
12 WIPP PA regulatory compliance demonstration since the CCA (U.S. DOE 1996). The 1998
13 rulemaking that certified the WIPP to receive transuranic (TRU) waste required the DOE to
14 implement the Option D PCS at the WIPP. The DOE has submitted a planned change request to
15 the EPA requesting that the EPA modify Condition 1 of the Final Certification Rulemaking for
16 40 CFR Part 194 (U.S. EPA 1998a) for the WIPP, and that a revised panel closure design be
17 approved for use in all panels (U.S. DOE 2011a). The revised panel closure design, denoted as
18 the ROMPCS, is comprised of 100 feet (ft) of run-of-mine (ROM) salt with barriers at each end.
19 A PA was executed to quantify WIPP repository performance impacts associated with the
20 replacement of the approved Option D PCS design with the ROMPCS (Camphouse et al. 2012).
21 It was found that long-term WIPP performance with the ROMPCS design is similar to that seen
22 with Option D. The ROMPCS design is implemented in the CRA-2014 PA.

23 **MASS-2.6.3 Additional Mined Volume in the Repository North End**

24 Following the recertification of the WIPP in November of 2010, the DOE submitted a planned
25 change notice to the EPA that justified additional excavation to the WIPP experimental area
26 (U.S. DOE 2011b). A performance assessment was undertaken to determine the impact of the
27 additional excavation on the long-term performance of the facility (Camphouse et al. 2011).
28 After reviewing the DOE proposal and written responses to questions related to the effects of
29 increasing the mining area, the EPA found that the mining activities will not adversely impact
30 WIPP waste handling activities, air monitoring, disposal operations, or long-term repository
31 performance (U.S. EPA 2011). Additional excavation in the WIPP experimental area is included
32 in the CRA-2014 PA.

33 **MASS-2.6.4 Refinement to the Probability of Encountering Pressurized Brine**

34 Penetration into a region of pressurized brine during a hypothetical WIPP drilling intrusion can
35 have significant consequences with respect to releases. The WIPP PA parameter
36 GLOBAL:PBRINE (hereafter called PBRINE) is used to specify the probability that a drilling
37 intrusion into the excavated region of the repository encounters a region of pressurized brine
38 below the repository. A framework that provides a quantitative argument for refinement of

1 parameter PBRINE has been developed since the CRA-2009 PABC (Kirchner, Zeitler, and
2 Kirkes 2012). The distribution for PBRINE that results from this framework is used in the CRA-
3 2014 PA.

4 **MASS-2.6.5 Refinement to the Corrosion Rate of Steel**

5 The interaction of steel in the WIPP with repository brines results in the formation of hydrogen
6 (H₂) gas due to anoxic corrosion of the metal. The rate of H₂ gas generation depends on the
7 corrosion rate and the type of corrosion products formed. Experiments have been undertaken
8 with the aim of determining steel and lead corrosion rates under WIPP-relevant conditions (see
9 MASS-2.3.1). A description of the new experiments and the use of their results to determine an
10 updated anoxic corrosion rate for brine-inundated steel in the absence of CO₂ are presented in
11 Roselle (Roselle 2013a). This updated rate is used in the CRA-2014 PA.

12 **MASS-2.6.6 Refinement to the Effective Shear Strength of WIPP Waste**

13 WIPP PA includes scenarios in which a hypothetical human intrusion results in a borehole
14 intersecting the repository. New experiments have been conducted to determine the erosive
15 impact on surrogate waste materials that were developed to represent WIPP waste that is 50%,
16 75%, and 100% degraded by weight (see MASS-2.3.2). A description of the experimental
17 configuration and conclusions made from the experimental results are given in Herrick et al.
18 (Herrick et al. 2012). Based on the experimental results and analysis of existing data, Herrick
19 (Herrick 2013) recommends a refinement to the waste shear strength parameter used in WIPP
20 PA. The recommended refinement to this parameter is used in the CRA-2014 PA.

21 **MASS-2.6.7 Waste Inventory Update**

22 The waste information used in the CRA-2014 PA is updated from that used in the CRA-2009
23 PABC calculations. The Performance Assessment Inventory Report (PAIR) – 2012 (Van Soest
24 2012) was released on November 29, 2012. The PAIR – 2012 contains updated estimates to the
25 radionuclide content and waste material parameters, scaled to a full repository, based on
26 inventory information collected through December 31, 2011. The WIPP PA inventory
27 parameters are updated in the CRA-2014 PA to account for this new information. Waste
28 information in the CRA-2014 PA is discussed further in Kicker and Zeitler (Kicker and Zeitler
29 2013).

30 **MASS-2.6.8 Updated Drilling Rate**

31 The WIPP regulations require that current drilling practices be assumed when modeling
32 hypothetical future drilling intrusions in WIPP PA. The DOE continues to survey drilling
33 activity in the Delaware Basin in accordance with the criteria established in 40 CFR 194.33.
34 Results for the year 2012 are documented in the 2012 Delaware Basin Monitoring Annual Report
35 (U.S. DOE 2012). Drilling parameters are updated in the CRA-2014 PA to include information
36 assembled through 2012 (see MASS-2.2).

1 **MASS-2.6.9 Refinement to Repository Water Balance**

2 The saturation and pressure history of the repository are used throughout PA. Along with flow
3 in and out of the repository, the saturation and pressure are influenced by the reaction of
4 materials placed in the repository with the surrounding environment. As part of the review of the
5 CRA-2009, the EPA noted several issues for possible additional investigation, including the
6 potential implementation of a more detailed repository water balance (U.S. EPA 2010b). The
7 repository water balance implementation is refined in the CRA-2014 PA in order to include the
8 major gas and brine producing and consuming reactions in the existing conceptual model and is
9 discussed in Appendix PA-2014, Section PA-4.2.5.

10 **MASS-2.6.10 Variable Brine Volume Implementation**

11 To date, the minimum brine volume necessary for a direct brine release (DBR) has been used as
12 an input to the radionuclide solubility calculation. The entire organic ligand inventory was
13 assumed to be dissolved in the minimum necessary DBR brine volume, and the resulting organic
14 ligand concentrations were then used in the calculation of baseline radionuclide solubilities. The
15 trend toward increasing organic ligand content in the WIPP waste inventory has resulted in mass-
16 balance issues when determining radionuclide solubilities from only the minimum brine volume
17 necessary for a DBR. As a result, the calculation of baseline radionuclide solubilities is extended
18 in the CRA-2014 so that they are dependent on the concentration of organic ligands which vary
19 with the actual volume of brine present in the repository. Brine volumes of 1x, 2x, 3x, 4x, and
20 5x the minimum necessary DBR volume are used in the calculation of baseline radionuclide
21 solubilities in the CRA-2014. The organic ligand waste inventory is assumed to be dissolved in
22 each of these multiples of the minimum necessary brine volume. The resulting organic ligand
23 concentrations, now dependent on a range of brine volumes, are then used to calculate baseline
24 radionuclide solubilities corresponding to each brine volume. This approach keeps radionuclide
25 mass constant over realized brine volumes, rather than keeping radionuclide concentration
26 constant over realized brine volumes. Further discussion of this approach is given in Camphouse
27 (Camphouse 2013).

28 **MASS-2.6.11 Updated Radionuclide Solubilities and Uncertainty**

29 The solubilities of actinide elements are influenced by the chemical components of the waste.
30 With the release of the PAIR – 2012 (Van Soest 2012), updated information on the amount of
31 various chemical components in the waste is available. To incorporate this updated information,
32 parameters used to represent actinide solubilities are updated in the CRA-2014 PA. Solubilities
33 are calculated in the CRA-2014 PA using multiples of the minimum brine volume necessary for
34 a DBR to occur. Additional experimental results have been published in the literature since the
35 CRA-2009 PABC, and this new information is used in the CRA-2014 PA to enhance the
36 uncertainty ranges and probability distributions for actinide solubilities. More discussion of
37 radionuclide solubilities and their associated uncertainties is given in Brush and Domski (Brush
38 and Domski 2013a and Brush and Domski 2013b) and Appendix SOTERM 2014, Section
39 SOTERM-5.0.

1 **MASS-2.6.12 Updated Colloid Parameters**

2 Colloid parameters are updated in the CRA-2014 PA to incorporate recently available data given
 3 in Reed et al. (Reed et al. 2013). Actinide colloid enhancement parameters were re-assessed and
 4 updated, as appropriate, to reflect recent literature and more extensive WIPP-specific data. The
 5 CRA-2014 PA contains no changes to the WIPP colloid model developed for the CCA.

6 **MASS-2.6.13 Summary of CRA-2014 Changes**

7 The CRA-2014 PA is updated based on new information since the CRA-2009 PABC.
 8 Information on the implementation of these changes is contained in Camphouse (Camphouse
 9 2013), Section 2.1, and is summarized in Table MASS-4.

10 **Table MASS-4. Changes Incorporated in the CRA-2014**

WIPP Project Change	Summary of Change and Cross-Reference
Panel Closure Design	The Option D PCS design is replaced with the ROMPCS design (Camphouse et al. 2012; Camphouse 2013).
Added Volume in the Repository Experimental Region	A volume of 60,335 cubic meters (m ³) is added to the volume of the WIPP experimental region (Camphouse et al. 2011).
Probability of Encountering Pressurized Brine during a Drilling Intrusion	A revised distribution is used for WIPP PA parameter GLOBAL:PBRINE (Kirchner, Zeitler, and Kirkes 2012).
Refinement to Steel Corrosion Rate	A revised distribution is used for WIPP PA parameter STEEL:CORRMCO2 (Roselle 2013a).
Updated Waste Shear Strength	A revised distribution is used for WIPP PA parameter BOREHOLE:TAUFAIL (Herrick 2013).
Updated Waste Inventory Information	Inventory parameters in the CRA-2014 PA are updated to reflect information collected through December 31, 2011 (Van Soest 2012; Kicker and Zeitler 2013).
Drilling Rate	The drilling rate increased from 59.8 to 67.3 boreholes per square kilometer (km ²) over 10,000 years (Camphouse 2013).
Refined Water Balance Implementation	The repository water balance implementation is refined to include the major gas and brine producing and consuming reactions in the existing conceptual model (Camphouse 2013; Clayton 2013).
Variable Brine Volume	Radionuclide concentrations in brine are dependent on the volume of brine in the repository, rather than only the minimum brine volume of 17,400 m ³ necessary for a DBR (see MASS-2.6.10).
Radionuclide Solubilities and their Uncertainty	Radionuclide baseline solubilities are updated to reflect the organic ligand content in the CRA-2014 PA waste inventory, and are calculated using brine volumes that are multiples of 17,400 m ³ . Solubility uncertainties are updated based on recently available results in published literature (Brush and Domski 2013a and Brush and Domski 2013b) and WIPP-specific data is included (SOTERM-2014, Sections SOTERM-3.0 and SOTERM-5.0).
Updated Colloid Parameters	Colloid parameters in the CRA-2014 are updated to reflect data presented in Reed et al. (Reed et al. 2013).

1 **MASS-2.7 Operational Considerations**

2 No operational changes that would impact modeling assumptions have been made at the WIPP
3 since the second recertification decision. Operational changes for the emplacement of MgO in
4 3,000-pound (lb) or 4,200-lb supersacks on every other stack of waste were made since the
5 CRA-2009. However, this change does not impact PA as enough MgO is always present to meet
6 the required excess factor of 1.2. As a result, no changes were made to modeling assumptions
7 for the CRA-2014 PA because of operational considerations.

1 **MASS-3.0 General Assumptions in PA Models**

2 A number of assumptions are applied generally to the disposal system through the conceptual
3 and mathematical models implemented in the CRA-2014 PA.

4 Table MASS-5, which lists modeling assumptions used in the PA, is a guide to general modeling
5 assumptions. Because many of the assumptions in that table have not changed since the CRA-
6 2004, material submitted with the first recertification application is listed for reference.
7 References to documents included in the CRA-2014 are also included where appropriate. Table
8 MASS-5 provides guidance for integrating the assumptions with (1) the chapters, sections, or
9 appendices in which they are discussed, and (2) the codes that implement them.

10 The FEPs discussed in Appendix SCR-2014 that are relevant to these assumptions are also
11 indicated. The final column in the table indicates whether the DOE considers each assumption to
12 be reasonable or conservative. The DOE has not attempted to bias the overall results of PA
13 toward a conservative outcome. However, the DOE has chosen to use conservative assumptions
14 where data or models are impractical to obtain, or where effects on performance are not expected
15 to be significant enough to justify development of a more complicated model. In all other cases,
16 best unbiased conceptual models and parameter values have been selected. The designator R
17 (reasonable) in the final column indicates that the DOE considers the assumption to be
18 reasonable based on WIPP-specific data or information, data or information considered
19 analogous to the WIPP disposal system, expert judgment, or other reasoning. The designator C
20 (conservative) indicates that the DOE considers the assumption may overestimate a process or
21 effect that may contribute to releases to the accessible environment. The regulatory designator
22 (Reg) indicates that the assumption is based on regulations in 40 CFR Part 191, criteria in 40
23 CFR Part 194, or other regulatory guidance.

1

Table MASS-5. General Modeling Assumptions

Chapter or Section	Assumption Number	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2014: MASS-3.0 General Assumptions in PA Models CRA-2014: MASS-3.1 Darcy's Law Applied for Fluid Flow calculated by BRAGFLO, MODFLOW-2000, and DRSPALL	1	BRAGFLO MODFLOW-2000	Flow is governed by mass conservation and Darcy's Law in porous media. Flow is laminar and fluids are Newtonian.	Saturated Groundwater Flow (N23) Unsaturated Groundwater Flow (N24) Brine Inflow (W40)	R
	2	BRAGFLO	Two-phase flow in the porous media is by simultaneous immiscible displacement.	Fluid Flow Due to Gas Production (W42)	R
	3	BRAGFLO	The Brooks-Corey or Van Genuchten/Parker equations represent interactions between brine and gas.	Fluid Flow Due to Gas Production (W42)	R
	4	BRAGFLO	The Klinkenberg effect is included for flow of gases at low pressures.	Fluid Flow Due to Gas Production (W42)	R
	5	BRAGFLO	Threshold displacement pressure for flow of gas into brine is constant.	Fluid Flow Due to Gas Production (W42)	R
	6	BRAGFLO MODFLOW-2000 SECOTP2D	Fluid composition and compressibility are constant.	Saturated Groundwater Flow (N23) Fluid Flow Due to Gas Production (W42)	R
CRA-2014: MASS-3.2 Hydrogen Gas as Surrogate for Waste-Generated Gas Physical Properties in BRAGFLO and DRSPALL	7	BRAGFLO DRSPALL	The gas phase is assigned the density and viscosity properties of hydrogen.	Fluid Flow Due to Gas Production (W42)	R
CRA-2014: MASS-3.3 Salado Brine as Surrogate for Liquid Phase Physical Properties in BRAGFLO	8	BRAGFLO	All liquid physical properties are assigned the properties of Salado brine.	Saturated Groundwater Flow (N23)	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

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Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.2 Model Geometries	BRAGFLO	The disposal system is represented by a two-dimensional, north-south, vertical cross section.	Stratigraphy (N1) Physiography (N39)	R
CRA-2004: 6.4.2.1 Disposal System Geometry	BRAGFLO	Flow in the disposal system is radially convergent or divergent centered on the repository, shaft, and borehole for disturbed performance.	Saturated Groundwater Flow (N23) Unsaturated Groundwater Flow (N24)	R
CRA-2014: MASS-4.0 Model Geometries	BRAGFLO	Variable dip in the Salado is approximated by a 1 degree dip to the south.	Stratigraphy (N1)	R
CRA-2014: MASS-4.1 Disposal System Geometry as Modeled in BRAGFLO	BRAGFLO	Stratigraphic layers are parallel.	Stratigraphy (N1)	R
	BRAGFLO	The stratigraphy consists of units above the Dewey Lake, the Forty-niner, the Magenta, the Tamarisk, the Culebra, the Los Medaños, and the Salado Formations (comprising impure halite, MB 138, anhydrites A and B [lumped together], and MB 139). The dimensions of these units are constant. A Castile brine reservoir is included in the BRAGFLO grid in all scenarios.	Stratigraphy (N1)	R
CRA-2004: 6.4.2.2 Culebra Geometry	MODFLOW-2000 SECOTP2D	The Culebra is represented by a two-dimensional, horizontal geometry for groundwater flow and radionuclide transport simulation.	Stratigraphy (N1)	R
	MODFLOW 2000 PEST	Transmissivity varies spatially. There is no vertical flow to or from the Culebra.	Groundwater Recharge (N54) Groundwater Discharge (N53)	R
	SECOTP2D	The regional flow field provides boundary conditions for local transport calculations (see CRA-2004, Chapter 6.0, Section 6.4.10.2).	Advection (W90)	R

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Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.3 The Repository CRA-2014: MASS-4.1 BRAGFLO Geometry of the Repository	BRAGFLO	The repository comprises five regions separated by panel closures: the waste panel, a north rest of repository (NRoR), a south RoR (SRoR) and the access drifts (separated by panel closures), the operations region, and the experimental region. A single shaft region is also modeled, and a borehole region is included for a borehole that intersects the separate waste panel. The dimensions of these regions are constant.	Disposal Geometry (W1)	R-C
	BRAGFLO	Long-term flow up plugged and abandoned boreholes modeled as if all intrusions occur into a downdip (southern) panel.	Disposal Geometry (W1)	C
	BRAGFLO	For each repository region, the model geometry preserves design volume.	Disposal Geometry (W1)	R
	BRAGFLO	Pillars, individual drifts, and rooms are not modeled for long-term performance, and containers provide no barrier to fluid flow.	Disposal Geometry (W1)	C
	BRAGFLO	Long-term flow is radial to and from the borehole that intersects the waste disposal panel during disturbed performance.	Waste-Induced Borehole Flow (H32)	R
	BRAGFLO	Disturbed rock zone (DRZ) provides a pathway to MBs.	—	R
	BRAGFLO	Grid and material properties are consistent with the ROMPCS panel closure design.	—	R

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Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.3.1 Creep Closure CRA-2014: MASS-5.0 Creep Closure	SANTOS	Creep closure is modeled using a two-dimensional model of a single room. Room interactions are insignificant.	Salt Creep (W20) Changes in the Stress Field (W21) Excavation-Induced Changes in Stress (W19)	R
CRA-2014: PORSURF	SANTOS	The amount of creep closure is a function of time, gas pressure, and waste-matrix strength.	Salt Creep (W20) Changes in the Stress Field (W21) Consolidation of Waste (W32) Pressurization (W26)	R
	BRAGFLO	Porosity of operations and experimental areas is fixed at a value representative of consolidated material.	Salt Creep (W20)	R
CRA-2004: 6.4.3.2 Repository Fluid Flow	BRAGFLO	General assumptions 1 to 8.	—	See above
CRA-2014: MASS-6.0 Repository Fluid Flow	BRAGFLO	The waste disposal region is assigned a constant permeability representative of average consolidated waste without backfill.	Saturated Groundwater Flow (N23) Unsaturated Groundwater Flow (N24)	R
CRA-2014: MASS-6.1 Flow Interactions with the Creep Closure Model	BRAGFLO	The experimental and operations regions are assigned a constant permeability representative of unconsolidated material and a constant porosity representative of consolidated material.	Saturated Groundwater Flow (N23) Unsaturated Groundwater Flow (N24) Salt Creep (N20)	C
CRA-2014: MASS-6.2 Flow Interactions with the Gas Generation Model	BRAGFLO	For gas generation calculations, the effects of wicking are accounted for by assuming that brine in the repository contacts waste to an extent greater than that calculated by the Darcy Flow model used.	Wicking (W41)	R

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Reg. - Based on regulatory guidance

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Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.3.3 Gas Generation Appendix TRU WASTE-2004 CRA-2014: MASS-7.0 Gas Generation	BRAGFLO	Gas generation occurs by anoxic corrosion of steel containers and Fe and Fe-base alloys in the waste, giving H ₂ , and by microbial consumption of cellulose and, possibly, plastics and rubbers, giving mainly CO ₂ and hydrogen sulfide (H ₂ S). Radiolysis, oxidic reactions, and other gas generation mechanisms are insignificant. Gas generation is calculated using the average-stoichiometry model, and is dependent on brine availability.	Container Material Inventory (W5) Waste Inventory (W2) Degradation of Organic Material (W44) Gases from Metal Corrosion (W49)	R
	BRAGFLO	The anoxic corrosion rate is dependent on liquid saturation. Anoxic corrosion of steel continues until all the steel is consumed. Steel corrosion will not be passivated by microbially generated gases (CO ₂ or H ₂ S). The water in brine is consumed by the corrosion reaction.	Brine Inflow (W40) Gases from Metal Corrosion (W49) Degradation of Organic Material (W44)	R
	BRAGFLO	Laboratory-scale experimental measurements of gas generation rates at expected room temperatures are used to account for the effects of biofilms and chemical reactions.	Effects of Biofilms on Microbial Gas Generation (W48) Effects of Temperature on Microbial Gas Generation (W45) Chemical Effects of Corrosion (W51)	R

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Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	BRAGFLO	The rate of microbial gas production is dependent on the amount of liquid present. Significant microbial activity occurs in all the simulations. In 75% of the simulations, microbes may consume all of the cellulosics but none of the plastics and rubbers. In the remaining 25% of the simulations, microbes may consume all of the cellulosics and all of the plastics and rubbers. Microbial production will continue until all biodegradable cellulosic, plastic, and rubber (CPR) materials are consumed if brine is present. The MgO backfill will react with all of the CO ₂ and remove it from the gaseous phase.	Brine Inflow (W40) Degradation of Organic Material (W44) Waste Inventory (W2)	R
	BRAGFLO	Gas dissolution in brine is of negligible consequence.	Fluid Flow Due to Gas Production (W42)	R
	BRAGFLO	The gaseous phase is assigned the properties of hydrogen (General Assumption 7).	Fluid Flow Due to Gas Production (W42)	See above
CRA-2004: 6.4.3.4 Chemical Conditions in the Repository CRA-2014: SOTERM-2.0 Conceptual Framework of Chemical Conditions	NUTS PANEL	Chemical conditions in the repository will be constant. Chemical equilibrium is assumed for all reactions that occur between brine in the repository, waste, and abundant minerals, with the exceptions of gas generation and actinide redox reactions.	Speciation (W56) Reduction-Oxidation Kinetics (W66)	R
	NUTS PANEL	Brine and waste in the repository will contain a uniform mixture of dissolved and colloidal species. All actinides have instant access to all repository brine.	Heterogeneity of Waste Forms (W3) Speciation (W56)	C

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Reg. - Based on regulatory guidance

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Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	NUTS PANEL	No microenvironments that influence the overall chemical environment will persist.	Speciation (W56)	R
	NUTS PANEL	For the undisturbed performance and E2 scenarios, brine in the waste panels has the composition of Salado brine. For E1 and E1E2 (Appendix PA-2014, Section PA-2.3.2.2) scenarios, all brine in the waste panel intersected by the borehole has the composition of Castile brine.	Speciation (W56)	R
	NUTS PANEL	Chemical conditions in the waste panels will be reducing. However, a condition of redox disequilibrium will exist between the possible oxidation states of the An elements.	Reduction-Oxidation Kinetics (W66) Speciation (W56) Effects of Metal Corrosion (W64)	R
	NUTS PANEL	The pH and CO ₂ fugacity in the waste panels will be controlled by the equilibrium between Mg(OH) ₂ and Mg ₅ (CO ₃) ₄ (OH) ₂ ·4H ₂ O. (A result of this assumption is low CO ₂ fugacity and mildly basic conditions.)	Speciation (W56) Backfill Chemical Composition (W10)	R
CRA-2004: 6.4.3.5 Dissolved Actinide Source Term CRA-2014: SOTERM-3.3 The Fracture Matrix Transport Computer Code	NUTS PANEL	Radionuclide dissolution to solubility limits is instantaneous.	Dissolution of Waste (W58)	C
	NUTS PANEL	Six actinides (thorium (Th), uranium (U), neptunium (Np), plutonium (Pu), americium (Am), and curium (Cm)) are used in PANEL for calculations of radionuclide transport of brine (up a borehole). Four actinides (Th, U, Pu, and Am) are explicitly considered in NUTS for calculations of radionuclide transport in brine (porous materials) (Kicker and Zeitler 2013).	Waste Inventory (W2)	R

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C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	NUTS PANEL	The reducing conditions in the repository will eliminate significant concentrations of Np(VI), Pu(V), Pu(VI), and Am(V) species. Am and Cm will exist predominantly in the III oxidation state; while Th will exist in the IV oxidation state. It is assumed that the solubilities and K_d values of U, Np, and Pu will be dominated by one of the remaining oxidation states: U(IV) or U(VI), Np(IV) or Np(V), and Pu(III) or Pu(IV) (See Appendix SOTERM-2014, Table SOTERM-15).	Speciation (W56) Reduction-Oxidation Kinetics (W66)	R
	NUTS PANEL	For a given oxidation state, the different actinides have similar solubilities.	Speciation (W56)	R
	NUTS PANEL	For undisturbed performance and for all aspects of disturbed performance, except for cuttings and cavings releases, radionuclides in the waste are distributed evenly throughout the disposal panel.	Waste Inventory (W2) Heterogeneity of Waste Forms (W3)	R
	NUTS PANEL	Mobilization of actinides in the gas phase is negligible.	Dissolution of Waste (W58)	R
	NUTS PANEL	An concentrations in the repository will be inventory limited when the mass of an An becomes depleted such that the predicted concentrations cannot be achieved.	Dissolution of Waste (W58)	R
CRA-2004: 6.4.3.6 Source Term for Colloidal Actinides	NUTS PANEL	Four types of colloids constitute the source term for colloidal actinides: intrinsic, mineral fragment, microbial, and humic.	Colloid Formation and Stability (W79) Humic and Fulvic Acids (W70)	R
	NUTS PANEL	Intrinsic colloids for all actinides are experimentally defined.	Colloid Formation and Stability (W79)	R

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C = Conservative

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See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	NUTS PANEL	Concentrations of intrinsic colloids and mineral-fragment colloids are modeled as constants based on experimental observations. Humic and microbial colloidal An concentrations are modeled as proportional to dissolved An concentrations.	Colloid Formation and Stability (W79)	R
	NUTS PANEL	The maximum concentration of each An associated with each colloid type is constant.	Actinide Sorption (W61)	R
CRA-2004: 6.4.4 Shafts and Shaft Seals	BRAGFLO	General Assumptions 1 to 8.	—	See above
CRA-2014: MASS-11.0 Shafts and Shaft Seals	BRAGFLO	The four shafts connecting the repository to the surface are represented by a single shaft with a cross-section and volume equal to the total volume of the four real shafts and separated from the waste by less than the distance of the nearest real shaft.	Disposal Geometry (W1)	R
	BRAGFLO	The shaft seal system is represented by an upper and lower shaft region representing a composite of the actual materials in those regions.	Shaft Seal Geometry (W6) Shaft Seal Physical Properties (W7)	R
	BRAGFLO	The shaft is surrounded by a DRZ which heals with time. The DRZ is represented through the composite permeabilities of the shaft system itself, rather than as a discrete zone. The effective permeabilities of shaft materials are adjusted at 200 years after closure to reflect consolidation and possible degradation. Permeabilities are constant for the shaft seal materials through the Rustler formation.	Salt Creep (W20) Consolidation of Shaft Seals (W36) DRZ (W18) Microbial Growth on Concrete (W76) Chemical Degradation of Shaft Seals (W74) Mechanical Degradation of Shaft Seals (W37)	R

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C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	NUTS	Radionuclides are not retarded by the seals.	Actinide Sorption (W61) Speciation (W56)	C
CRA-2004: 6.4.5 The Salado CRA-2014: MASS-12.0 Salado	BRAGFLO	General Assumptions 1 to 8.	—	See above
CRA-2004: 6.4.5.1 Impure Halite CRA-2014: MASS-12.1 High Threshold Pressure for Halite-Rich Salado Rock Units	BRAGFLO	Intact rock and hydrologic properties are constant.	Stratigraphy (N1)	R
CRA-2004: 6.4.5.2 Salado Interbeds CRA-2014: MASS-12.3 The Fracture Model	BRAGFLO	Interbeds have a fracture-initiation pressure above which local fracturing and changes in porosity and permeability occur in response to changes in pore pressure. A power function relates the permeability increase to the porosity increase. A pressure is specified above which porosity and permeability do not change.	Disruption Due to Gas Effects (W25)	R
	BRAGFLO	Interbeds have identical physical properties; they differ only in position, thickness, and some fracture parameters.	Saturated Groundwater Flow (N23)	R
CRA-2004: 6.4.5.3 Disturbed Rock Zone CRA-2014: MASS-12.4 Flow in the DRZ	BRAGFLO	The permeability of the DRZ is sampled with the low value similar to intact halite and the high value representing a fractured material. The DRZ porosity is equal to the porosity of Salado halite to plus 0.29%.	Disturbed Rock Zone (DRZ) (W18) Roof Falls (W22) Gas Explosions (W27) Seismic Activity (N12) Underground Boreholes (W39)	C-R
CRA-2004: 6.4.5.4 Actinide Transport in the Salado CRA-2014: MASS-12.5 Actinide Transport in the Salado	NUTS	Dissolved actinides and colloidal actinides are transported by advection in the Salado. Diffusion and dispersion are assumed negligible.	Advection (W90) Diffusion (W91) Matrix Diffusion (W92)	R

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C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	NUTS	Sorption of actinides in the anhydrite interbeds, colloid retardation, colloid transport at higher than average velocities, coprecipitation of minerals containing actinides, channeled flow, and viscous fingering are not modeled.	Actinide Sorption (W61) Colloid Transport (W78) Colloid Filtration (W80) Colloid Sorption (W81) Fluid Flow Due to Gas Production (W42) Fracture Flow (N25)	R
	NUTS	Radionuclides having similar decay and transport properties have been grouped together for transport calculations as discussed in Kicker and Zeitler (Kicker and Zeitler 2013). See also assumptions for dissolved actinide source term.	Radionuclide Decay and Ingrowth (W12)	R
	NUTS	Sorption of actinides in the borehole is not modeled.	Actinide Sorption (W61)	C
CRA-2004: 6.4.6 Units Above the Salado CRA-2014: MASS-13.0 Geologic Units above the Salado	SECOTP2D	Above the Salado, lateral An transport to the accessible environment can occur only through the Culebra.	Saturated Groundwater Flow (N23) Unsaturated Groundwater Flow (N24) Solute Transport (W77)	R
CRA-2004: 6.4.6.1 Los Medaños	MODFLOW-2000 BRAGFLO	The Los Medaños member of the Rustler Formation, Tamarisk, and Forty-niner are assumed to be impermeable.	Saturated Groundwater Flow (N23)	C
CRA-2004: 6.4.6.2 The Culebra	MODFLOW-2000 SECOTP2D	General Assumptions 1, 6, and 8.	—	See above
CRA-2014: MASS-14.0 Flow through the Culebra CRA-2014: TFIELD	MODFLOW-2000	For fluid flow, the Culebra is modeled as a uniform (single-porosity) porous medium.	Saturated Groundwater flow (N23)	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	MODFLOW-2000	The Culebra flow field is determined from the observed hydraulic conditions and estimates of the effects of climate change and potash mining outside the controlled area, and does not change with time unless mining is predicted to occur in the disposal system in the future.	Saturated Groundwater Flow (N23) Climate Change (N61) Precipitation (e.g., Rainfall) (N59) Temperature (N60) Changes in Groundwater Flow Due to Mining (H37)	R
	BRAGFLO	The Culebra is assigned a single permeability to calculate brine flow into the unit from an intrusion borehole.	Natural Borehole Fluid Flow (H31) Waste-Induced Borehole Flow (H32)	R
	MODFLOW-2000	Gas flow in the Culebra is not modeled. Gas from the repository does not affect fluid flow in the Culebra.	Saturated Groundwater Flow (N23) Fluid Flow Due to Gas Production (W42)	R
	BRAGFLO MODFLOW-2000 SECOTP2D	Different thicknesses of the Culebra are assumed for BRAGFLO, MODFLOW-2000, and SECOTP2D calculations, although the transmissivities are consistent.	Effects of Preferential Pathways (N27)	R
	PEST	Uncertainty in the spatial variability of the Culebra transmissivity is accounted for by statistically generating 100 transmissivity fields for PA.	Saturated Groundwater Flow (N23) Fracture Flow (N25) Shallow Dissolution (N16)	R
	MODFLOW-2000 BRAGFLO	Potentiometric heads are set on the edges of the regional grid to represent flow in a portion of a much larger hydrologic system.	Groundwater Recharge (N54) Groundwater Discharge (N53) Changes in Groundwater Recharge and Discharge (N56) Infiltration (N55)	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.6.2.1 Transport of Dissolved Actinides in the Culebra	SECOTP2D	Dissolved actinides are transported by advection in high-permeability features and by diffusion in low-permeability features.	Solute Transport (W77) Advection (W90) Diffusion (W91) Matrix Diffusion (W92)	R
CRA-2014: MASS-14.2 Dissolved Actinide Transport and Retardation in the Culebra	SECOTP2D	Sorption occurs on dolomite in the matrix. Sorption on clays present in the Culebra is not modeled.	Actinide Sorption (W61) Changes in Sorptive Surfaces (W63)	C
	SECOTP2D	Sorption is represented using a linear isotherm model.	Actinide Sorption (W61) Kinetics of Sorption (W62)	R
	SECOTP2D	The possible effects on sorption of the injection of brines from the Castile and Salado into the Culebra are accounted for in the distribution of An K_d values.	Actinide Sorption (W61) Groundwater Geochemistry (N33) Changes in Groundwater Eh (N36) Changes in Groundwater pH (N37) Natural Borehole Fluid Flow (H31)	R
	SECOTP2D	Hydraulically significant fractures are assumed to be present everywhere in the Culebra.	Advection (W90)	C
CRA-2004: 6.4.6.2.2 Transport of Colloidal Actinides in the Culebra	SECOTP2D	An humic colloids are chemically retarded identically to dissolved actinides and are treated as dissolved actinides.	Advection (W90) Diffusion (W91) Colloid Transport (W78) Microbial Transport (W87)	R
CRA-2014: MASS-14.3 Colloidal Actinide Transport and Retardation in the Culebra	SECOTP2D	The concentration of intrinsic colloids is sufficiently low to justify elimination from PA transport calculations in the Culebra.	—	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	SECOTP2D	Microbial colloids and mineral fragments are too large to undergo matrix diffusion. Filtration of these colloids, which is modeled using an exponential decay approach, occurs in high-permeability features. Attenuation is so effective that associated actinides are assumed to be retained within the disposal system and are not transported in SECOTP2D.	Microbial Transport (W87) Colloid Sorption (W81)	R
CRA-2004: 6.4.6.2.3 Subsidence Due to Potash Mining CRA-2014: MASS-14.4 Subsidence Caused by Potash Mining in the Culebra	MODFLOW-2000	The effect of potash mining is to increase the hydraulic conductivity in the Culebra by a factor between 1 and 1,000.	Conventional Underground Potash Mining (H13) Changes in Groundwater Flow Due to Mining (H37)	Reg.
CRA-2004: 6.4.6.3 The Tamarisk	MODFLOW-2000 BRAGFLO	The Tamarisk is assumed to be impermeable.	Saturated Groundwater Flow (N23)	R
CRA-2004: 6.4.6.4 The Magenta	BRAGFLO	General Assumptions 1 to 8.	—	See above
	BRAGFLO	The Magenta permeability is set to the lowest value measured near the center of the WIPP site. This increases the flow into the Culebra.	Saturated Groundwater Flow (N23)	R
	NUTS	No radionuclides entering the Magenta will reach the accessible environment. However, the volumes of brine and actinides entering and stored in the Magenta are modeled.	Solute Transport (W77)	R
CRA-2004: 6.4.6.5 The Forty-niner	BRAGFLO	The Forty-niner is assumed to be impermeable.	Saturated Groundwater Flow (N23)	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.6.6 Dewey Lake	BRAGFLO	General Assumptions 1 to 8.	—	See above
	NUTS	The sorptive capacity of the Dewey Lake is sufficiently large to prevent any release over 10,000 years.	Saturated Groundwater Flow (N23) Actinide Sorption (W61)	R
CRA-2004: 6.4.6.7 Supra-Dewey Lake Units	BRAGFLO	General Assumptions 1 to 8.	—	See above
	BRAGFLO	The units above the Dewey Lake are a single hydrostratigraphic unit.	Stratigraphy (N1)	R
	BRAGFLO	The units are thin and predominantly unsaturated.	Unsaturated Groundwater Flow (N24) Saturated Groundwater Flow (N23)	R
CRA-2004: 6.4.7 The Intrusion Borehole CRA-2004: 6.4.7.1 Releases during Drilling CRA-2014: MASS-15.0 Intrusion Borehole	CUTTINGS_S BRAGFLO DRSPALL	Any actinides that enter the borehole during drilling are assumed to reach the surface.	—	C
CRA-2014: MASS-15.1 Cuttings, Cavings, and Spall Releases during Drilling	BRAGFLO PANEL CUTTINGS_S DRSPALL	Future drilling practices will be the same as they are at present.	Oil and Gas Exploration (H1) Potash Exploration (H2) Oil and Gas Exploitation (H4) Other Resources (H8) Enhanced Oil and Gas Recovery (H9)	Reg.
	CUTTINGS_S DRSPALL	Releases of particulate waste material are modeled (cuttings, cavings, and spillings). Releases are corrected for radioactive decay until the time of intrusion.	Drilling Fluid Flow (H21) Suspension of Particles (W82) Cuttings (W84) Cavings (W85) Spallings (W86)	R
	CUTTINGS_S	Degraded waste properties are based on marine clays and surrogate materials.	Cavings (W85)	C

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

1 See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	DRSPALL	A hemispherical geometry with one-dimensional spherical symmetry defines the flow field and cavity in the waste.	Spallings (W86)	C
	DRSPALL	Tensile strength, based on completely degraded waste surrogates, is felt to represent extreme, low-end tensile strengths because it does not account for several strengthening mechanisms.	Spallings (W86)	C
	DRSPALL	Shape factor is 0.1, corresponding to particles that are easier to fluidize and entrain in the flow.	Spallings (W86)	C
CRA-2004: 6.4.7.1.1 Direct Brine Release During Drilling CRA-2014: MASS-15.2 Direct Brine Releases during Drilling	BRAGFLO PANEL	Brine containing actinides may flow to the surface during drilling. DBR will have negligible effect on the long-term pressure and saturation in the waste panel.	Blowouts (H23)	R
	BRAGFLO	A two-dimensional grid (one degree dip) on the scale of the waste disposal region is used for DBR calculations.	Blowouts (H23)	R
	BRAGFLO CCDFGF	Calculation of DBR from several different locations provides reference results for the variation in release associated with location.	Blowouts (H23)	R
CRA-2004: 6.4.7.2 Long-Term Releases Following Drilling CRA-2014: MASS-15.3 Long-Term Properties of the Abandoned Intrusion Borehole	BRAGFLO CCDFGF	Plugging and abandonment of future boreholes are assumed to be consistent with practices in the Delaware Basin.	Natural Borehole Fluid Flow (H31) Waste-Induced Borehole Flow (H32)	Reg.
	BRAGFLO CCDFGF	A continuous concrete plug is assumed to exist throughout the Salado and Castile. Long-term releases through a continuous plug are analogous to releases through a sealed shaft.	Natural Borehole Fluid Flow (H31) Waste-Induced Borehole Flow (H32)	Reg.-R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.7.2.2 The Two-Plug Configuration (Plug types I, III, and V in U.S. DOE 2012)	BRAGFLO	A lower plug is located between the Castile brine reservoir and underlying formations. A second plug is located immediately above the Salado. The brine reservoir and waste panel are in direct communication through an open cased hole.	Natural Borehole Fluid Flow (H31) Waste-Induced Borehole Flow (H32)	Reg.-R
	BRAGFLO	The casing and upper concrete plug are assumed to fail after 200 years, and the borehole is assumed to be filled with silty-sand-like material. At 1,200 years after abandonment, the permeability of the borehole below the waste panel is decreased by one order of magnitude as a result of salt creep.	Natural Borehole Fluid Flow (H31) Waste-Induced Borehole Flow (H32)	R
CRA-2004: 6.4.7.2.3 The Three-Plug Configuration (Plug types II and IV in U.S. DOE 2012)	BRAGFLO	In addition to the two-plug configuration, a third plug is placed within the Castile above the brine reservoir. The third plug is assumed not to fail over the regulatory time period.	Natural Borehole Fluid Flow (H31) Waste-Induced Borehole Flow (H32)	Reg.-R
CRA-2004: 6.4.8 Castile Brine Reservoir CRA-2014: MASS-17.0 Castile Brine Reservoir	BRAGFLO	The Castile region is assigned a low permeability, which inhibits fluid flow. Brine occurrences in the Castile are bounded systems. Brine reservoirs under the waste panels are assumed to have limited extent and interconnectivity, with effective radii on the order of several hundred meters (m).	Brine Reservoirs (N2)	R
CRA-2004: 6.4.9 Climate Change CRA-2014: MASS-16.0 Climate Change	SECOTP2D	Climate-related factors are treated through recharge. A parameter called the Climate Index is used to scale the Culebra flux field.	Climate Change (N61) Temperature (N60) Precipitation (e.g., Rainfall) (N59)	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.10 Initial and Boundary Conditions for Disposal System Modeling CRA-2004: 6.4.10.1 Disposal System Flow and Transport Modeling (BRAGFLO and NUTS)	BRAGFLO	There are no gradients for flow in the far-field of the Salado, and pressures are above hydrostatic but below lithostatic. Excavation and waste emplacement result in partial drainage of the DRZ.	Saturated Groundwater Flow (N23) Brine Inflow (W40)	R
	BRAGFLO	An initial water-table surface is set in the Dewey Lake at an elevation of 980 m (3,215 ft) above mean sea level. The initial pressures in the Salado are extrapolated from a sampled pressure in MB139 at the shaft and are in hydrostatic equilibrium. The excavated region is assigned an initial pressure of one atmosphere. The liquid saturation of the waste-disposal region is consistent with the liquid saturation of emplaced waste. Other excavated regions are assigned zero liquid saturation, except the shaft, which is fully saturated.	Saturated Groundwater Flow (N23)	R
	NUTS	Molecular transport boundary conditions are no diffusion or dispersion in the normal direction across far-field boundaries. Initial An concentrations are zero everywhere, except in the waste.	Radionuclide Decay and Ingrowth (W12) Solute Transport (W77)	R
CRA-2004: 6.4.10.2 Culebra Flow and Transport Modeling (MODFLOW-2000, SECOTP2D)	MODFLOW-2000	Constant head and no-flow boundary conditions are set on the far-field boundaries of the flow model.	Saturated Groundwater Flow (N23)	R
	MODFLOW-2000	Initial An concentrations in the Culebra are zero.	Solute Transport (W77)	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.10.3 Initial and Boundary Conditions for Other Computational Models	NUTS PANEL BRAGFLO (DBR) CUTTINGS_S	Initial and boundary conditions are interpolated from previously executed BRAGFLO calculations.	—	R
CRA-2004: 6.4.12 Sequences of Future Events	CCDFGF	Each 10,000-year future (random sequence of future events) is generated by randomly and repeatedly sampling (1) the time between drilling events, (2) the location of drilling events, (3) the activity level of the waste penetrated by each drilling intrusion, (4) the plug configuration of the borehole, and (5) the penetration of a Castile brine reservoir, and by randomly sampling the occurrence of mining in the disposal system.	Oil and Gas Exploration (H1) Potash Exploration (H2) Oil and Gas Exploitation (H4) Other Resources (H8) Enhanced Oil and Gas Recovery (H9) Natural Borehole Fluid Flow (N31) Waste-Induced Borehole Flow (H32)	Reg.-R
CRA-2004: 6.4.12.1 Active and Passive Institutional Controls in Performance Assessment	CCDFGF	Active institutional controls are effective for 100 years and completely eliminate the possibility of disruptive human activities (e.g., drilling and mining). No credit is taken for passive institutional controls.	—	Reg.-R
CRA-2004: 6.4.12.2 Number and Time of Drilling Intrusions	CCDFGF	Drilling may occur after 100 years according to a Poisson process.	Loss of Records (H57) Oil and Gas Exploration (H1) Potash Exploration (H2) Oil and Gas Exploitation (H4) Other Resources (H8)	Reg.-R
CRA-2004: 6.4.12.3 Location of Intrusion Boreholes	CCDFGF	The waste disposal region is discretized into 144 regions, each with an equal probability of being intersected. A borehole can penetrate only one region.	Disposal Geometry (W1)	R

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C = Conservative

Reg. - Based on regulatory guidance

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Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
CRA-2004: 6.4.12.4 Activity of the Intersected Waste Appendix TRU WASTE-2004	CCDFGF	Four-hundred fifty one waste streams are identified as contact-handled transuranic (CH-TRU). All 77 remote-handled transuranic (RH-TRU) waste streams were grouped (binned) together into one equivalent or average (WIPP-scale) RH-TRU waste stream.	Heterogeneity of Waste Forms (W3)	R
CRA-2004: 6.4.12.5 Diameter of the Intrusion Borehole	CUTTINGS_S	The diameter of the intrusion borehole is constant at 12.25 inches (in.) (31.12 centimeters [cm]).	—	Reg.-R
CRA-2004: 6.4.12.6 Probability of Intersecting a Brine Reservoir	CCDFGF	The probability that a deep borehole intersects the single brine reservoir below the waste panels is sampled from a normal distribution with a mean of 0.127 and a standard deviation equal to 0.0272 (see Kirchner, Zeitler, and Kirkes 2012).	Brine Reservoirs (N2)	R
CRA-2004: 6.4.12.7 Plug Configuration in the Abandoned Intrusion Borehole	CCDFGF	The two-plug configuration has a probability of 0.594. The three-plug configuration has a probability of 0.366. The continuous concrete plug has a probability of 0.04 (see Camphouse 2013).	—	Reg.-R
CRA-2004: 6.4.12.8 Probability of Mining Occurring in the Land Withdrawal Area	CCDFGF	Mining in the disposal system occurs a maximum of once in 10,000 years (a 10 ⁻⁴ probability per year).	—	Reg.-R
CRA-2004: 6.4.13 Construction of a Single Complementary Cumulative Distribution Function (CCDF)	CCDFGF	Deterministic calculations from BRAGFLO, NUTS, MODFLOW-2000, SECOTP2D, CUTTINGS_S, and PANEL are used to generate reference conditions that are used to estimate the consequences associated with random sequences of future events. These are, in turn, used to develop CCDFs.	—	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	CCDFGF	Ten thousand random sequences of future events are generated for each CCDF plotted.	—	R
CRA-2004: 6.4.13.1 Constructing Consequences of the Undisturbed Performance Scenario	CCDFGF	A BRAGFLO and NUTS calculation with undisturbed conditions is sufficient for estimating the consequences of the undisturbed performance scenario.	—	R
CRA-2004: 6.4.13.2 Scaling Methodology for Disturbed Performance Scenarios	CCDFGF	Consequences for random sequences of future events are constructed by scaling the consequences associated with deterministic calculations (reference conditions) to other times, generally by interpolation, but sometimes by assuming either similarity or no consequence.	—	R
CRA-2004: 6.4.13.3 Estimating Long-Term Releases from the E1 Scenario	CCDFGF NUTS	Reference conditions are calculated or estimated for intrusions at 100, 350, 1,000, 3,000, 5,000, 7,000, and 9,000 years.	Waste-Induced Borehole Flow (H32)	R
CRA-2004: 6.4.13.4 Estimating Long-Term Releases from the E2 Scenario	CCDFGF NUTS SECOTP2D	The methodology is similar to the methodology for the E1 scenario. For multiple E1 intrusions into the same panel, the additional source term to the Culebra for the second and subsequent intrusions is assumed to be negligible.	Waste-Induced Borehole Flow (H32) Waste Inventory (W2)	R
CRA-2004: 6.4.13.5 Estimating Long-Term Releases from the E1E2 Scenario	CCDFGF PANEL	The concentration of actinides in liquid moving up the borehole assumes homogeneous mixing within the panel.	Waste-Induced Borehole Flow (H32)	C
	PANEL	Any actinides that enter the borehole for long-term flow calculations reach the Culebra.	Waste-Induced Borehole Flow (H32)	C

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

Table MASS-5. General Modeling Assumptions (Continued)

Chapter or Section	Code	Modeling Assumption	Related FEP in Appendix SCR-2014	Assumption Considered ^a
	CCDFGF PANEL	Reference conditions are calculated or estimated for intrusion at 100, 300, 1,000, 2,000, 4,000, 6,000 and 9,000 years.	Oil and Gas Exploration (H1)	—
CRA-2004: 6.4.13.6 Multiple Scenario Occurrences	CCDFGF PANEL	The panels are assumed not to be interconnected for long-term brine flow.	Saturated Groundwater Flow (N23) Unsaturated Groundwater Flow (N24)	R
CRA-2004: 6.4.13.7 Estimating Releases During Drilling for All Scenarios	CCDFGF PANEL NUTS	Repository conditions will be dominated by Castile brine if any borehole connects to a brine reservoir.	Brine Reservoirs (N2) Natural Borehole Fluid Flow (H31)	R
	CUTTINGS_S PANEL CCDFGF	Depletion of actinides in parts of the repository penetrated by boreholes is not accounted for in calculating the releases from subsequent intrusions at such locations.	Waste-Induced Borehole Flow (H32) Waste Inventory (W2)	C
CRA-2004: 6.4.13.8 Estimating Releases in the Culebra and the Impact of the Mining Scenario	CCDFGF	Releases from intrusions at random times in the future are scaled from releases calculated at 100 years with a unit source of radionuclides in the Culebra.	—	R
	CCDFGF	Actinides in transit in the Culebra when mining occurs are transported in the flow field used for the undisturbed case. Actinides introduced subsequent to mining are transported in the flow field used for the disturbed case (i.e., the mined case).	—	R

^a R = Reasonable

C = Conservative

Reg. - Based on regulatory guidance

See above - Refers to assumptions 1 through 8 listed at the beginning of this table.

1

2

MASS-3.1 Darcy's Law Applied to Fluid Flow Calculated by BRAGFLO, MODFLOW-2000, and DRSPALL

A mathematical relationship expressing fluid flux as a function of hydraulic head gradients in a porous medium, commonly known as Darcy's Law, is applied to geologic media for all fluid-flow calculations. For details about the specific formulation of Darcy's Law used in these calculations, refer to Appendix PA-2014, Section PA-4.2 for the disposal system and Section PA-4.8 for the Culebra. Darcy's Law is not applied for flow up a borehole being drilled (see Section MASS-15.2; the CRA-2004, Chapter 6.0, Section 6.4.7.1.1; and Appendix PA-2014, Section PA-4.7 for more discussion of this topic).

Darcy's Law generally applies to flow models for which certain conditions are satisfied: (1) the flow occurs in a porous medium with interconnected porosity, (2) flow velocities are low enough that viscous forces dominate inertial forces, and (3) a threshold hydraulic gradient is exceeded. In the CCA, Appendix MASS, these conditions were shown to be valid for the WIPP PA.

Darcy's Law assumes laminar flow; that is, there is no motion of the fluid at the fluid/solid interface and velocity increases with distance from the fluid/solid interface. For liquids, it is reasonable to assume laminar flow under most conditions, including those found in and surrounding the WIPP repository. For gases at low pressure, however, gas molecules near the solid interface may not have intimate contact with the solid and may have finite velocity, not necessarily zero. This effect, which results in additional flux of gas above that predicted by application of Darcy's Law, is known as the slip phenomenon, or Klinkenberg effect (Bear 1972, p. 128). A correction to Darcy's Law for the Klinkenberg effect is incorporated into the BRAGFLO model (see Appendix PA-2014, Section PA-4.2).

Darcy flow for one and two phases implies that values for principal fluid and rock parameters must be specified. Fluid properties in the Darcy flow model used for the WIPP PA are density, viscosity, and compressibility, while rock properties are porosity, permeability, and compressibility (pore or bulk). In BRAGFLO, other parameters are required to describe the interactions or interference between the gas and brine phases present in the model because those phases can occupy the same pore space. In the WIPP application of Darcy flow models, compressibility of both the liquid and rock are related to porosity through a dependence on pressure. Fluid density, viscosity, and compressibility are functions of fluid composition, pressure, and temperature. It is assumed in BRAGFLO that fluid (both brine and gas) density and compressibility are pressure dependent, but fluid (both brine and gas) viscosity is constant. Fluid composition for the purposes of modeling flow and transport is assumed to be constant.

MASS-3.2 Hydrogen Gas as Surrogate for Waste-Generated Gas Physical Properties in BRAGFLO and DRSPALL

Hydrogen gas is produced as a result of the corrosion of steel in the repository by water or brine. As in the CCA, the gas phase in the BRAGFLO model is assigned the properties of hydrogen because hydrogen will, under most conditions reasonable for the WIPP, be the dominant component of the gas phase. The model for spallings, DRSPALL, also assigns the physical properties of hydrogen to the gas phase. As discussed in the following text, the effect of assuming flow of pure H₂ instead of a mixture of gases (including H₂, CO₂, H₂S, and methane

1 (CH₄), can be shown to be minor relative to the permeability variations in the surrounding
 2 formations.

3 Other gases may be produced by processes occurring in the repository. If microbial degradation
 4 occurs, a significant amount of CO₂ and possibly CH₄ will be generated by microbial
 5 degradation of cellulose and, possibly, plastics and rubbers in the waste. The CO₂ produced,
 6 however, will react with the magnesium-oxide (MgO) engineered barrier and cementitious
 7 materials to form brucite (Mg(OH)₂), hydromagnesite (Mg₅(CO₃)₄(OH)₂·4H₂O), and calcite
 8 (CaCO₃), thus resulting in very low CO₂ fugacity in the repository. Although other gases exist in
 9 the disposal system, BRAGFLO calculations assume these gases are insignificant and they are
 10 not included in the model.

11 With the average stoichiometry gas generation model, the total number of moles of gas generated
 12 will be the same whether the gas is considered to be pure H₂ or a mixture of several gases,
 13 because the generation of other gases is accounted for by specifying the stoichiometric factor for
 14 microbial degradation of cellulose (see Appendix PA-2014, Section PA-4.2.5). Therefore,
 15 considering only the moles of gas generated, the pressure buildup in the repository will be
 16 approximately the same because the expected gases behave similarly to an ideal gas, even up to
 17 lithostatic pressures.

18 The effect of assuming pure H₂ instead of a mixture of gases (including H₂, CO₂, H₂S and CH₄)
 19 on flow behavior, and its resulting impact on the WIPP repository pressure, is as follows:

20 Radial flow in a fully saturated rock with nonideal gas is described by Darcy's Law, which, for
 21 the given problem, has a solution of the form (Amyx, Bass, and Whiting 1960, p. 78, Equation
 22 2-33)

23
$$q_b = 1.988 \times 10^{-5} \left[\frac{T_b Z_b}{P_b} \frac{kh (P_e^2 - P_w^2)}{\mu_{avg} Z_{avg} \ln \left(\frac{r_e}{r_w} \right)} \right] \quad (\text{MASS.1})$$

24 which can be rewritten as

25
$$P_e^2 - P_w^2 = \frac{q_b P_b}{1.988 \times 10^{-5} T_b Z_b} \times \frac{\mu_{avg} Z_{avg}}{kh} \ln \left(\frac{r_e}{r_w} \right) \quad (\text{MASS.2})$$

26 where

27 q = gas flow rate (cubic ft per day at base (reference) conditions)

28 T = temperature (K)

29 P = pressure (pounds per square inch absolute)

30 k = permeability (millidarcys)

31 h = height (ft)

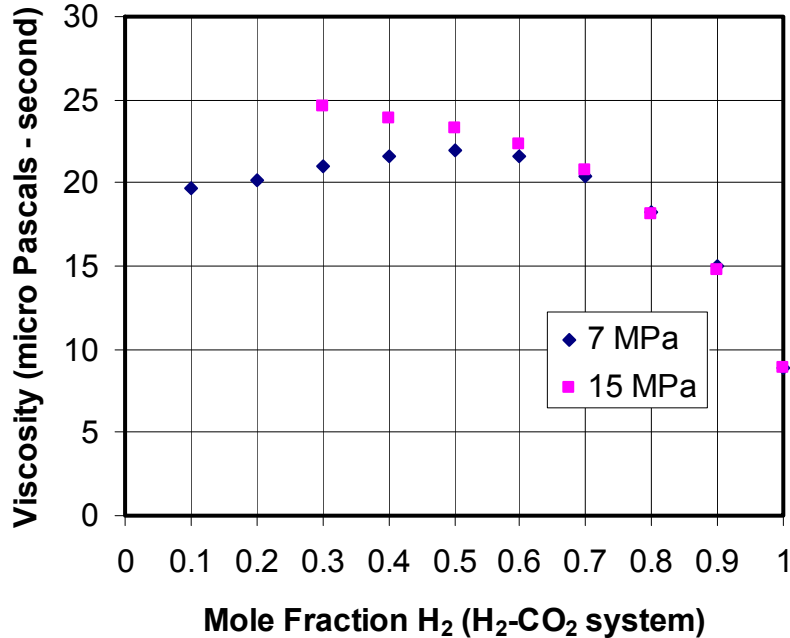
32 μ = viscosity (centipoises)

1 Z = gas compressibility factor (defined as the ratio of the actual molar volume of a gas to the
2 corresponding ideal gas volume RT/P at the same temperature and pressure)
3 r = radius (consistent units)
4 R = ideal gas constant
5 e = denotes external boundary (repository)
6 w = denotes internal boundary (wellbore)
7 b = denotes base or reference conditions for gas (temperature, pressure, compressibility
8 factor)
9 avg= denotes average properties between external and internal boundaries because u and z are
10 functions of pressure, which change with time

11 This expression is useful for examining the effects of gas properties, specifically the viscosity (μ)
12 and the compressibility (Z) and rock properties (namely k), on the flow rate (q) and the pressure
13 (P).

14 To evaluate the effect of gas composition on q and P, SUPERTRAPP, a computer program
15 developed by the National Institute of Standards and Technology (NIST), was used (National
16 Institute of Standards and Technology 1992). SUPERTRAPP calculates gas properties for 116
17 pure fluids and mixtures of up to 20 components for temperatures to 1,000 K (726 °C, 1340 °F)
18 and pressures to 300 megapascals (MPa). Because such small quantities of H₂S are anticipated
19 at the WIPP, its impact is negligible.

20 Figure MASS-1 shows the relationship between gas viscosity and composition of H₂-CO₂
21 mixtures for various mole fractions of H₂ at pressures of 7 MPa and 15 MPa, as determined from
22 SUPERTRAPP. The viscosity at 50% mole fraction H₂ is about 2.3 times greater than for 100%
23 mole fraction H₂. As shown in Equation (MASS.1), viscosity has an inverse relationship to flow
24 rate and, as shown in Equation (MASS.2), a direct relationship to the square of the repository
25 pressure. Hence, viscosity differences that would result if gas properties other than those of
26 hydrogen were incorporated would result in a decrease in flow rate and potentially higher
27 pressures.



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Figure MASS-1. Gas Viscosity as a Function of Mole Fraction H₂ at 7 MPa and 15 MPa Pressure

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As shown in Figure MASS-2, the gas compressibility at 50% mole fraction H₂ is about 0.9 times that of pure H₂. Like viscosity, the gas compressibility (actual volume/ideal volume) is inversely related to flow rate and directly related to the square of the repository pressure. Therefore, the impact of variation in gas compressibility caused by composition would be minor and it is not considered.

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The viscosity and compressibility calculations described above for H₂-CO₂ mixtures were repeated for H₂-CH₄ mixtures for various mole fractions of H₂ at pressures of 7 MPa and 15 MPa (Kanney 2003). The variability of viscosity with the composition for the H₂-CH₄ mixtures is smaller than that observed for the H₂-CO₂ mixtures. For example, at 15 Mpa, the gas viscosity of H₂-CH₄ at 50% mole fraction is only 1.6 times greater than the viscosity at 100% mole fraction. The H₂-CH₄ mixtures are only slightly less compressible than the H₂-CO₂ mixtures. For example, at 15 MPa, the gas compressibility of the H₂-CH₄ at 50% mole fraction is approximately 0.94 times the compressibility at 100% mole fraction. Changing composition from 100% to 50% H₂ would result in a slight increase in flow rate and a decrease in pressure.

18

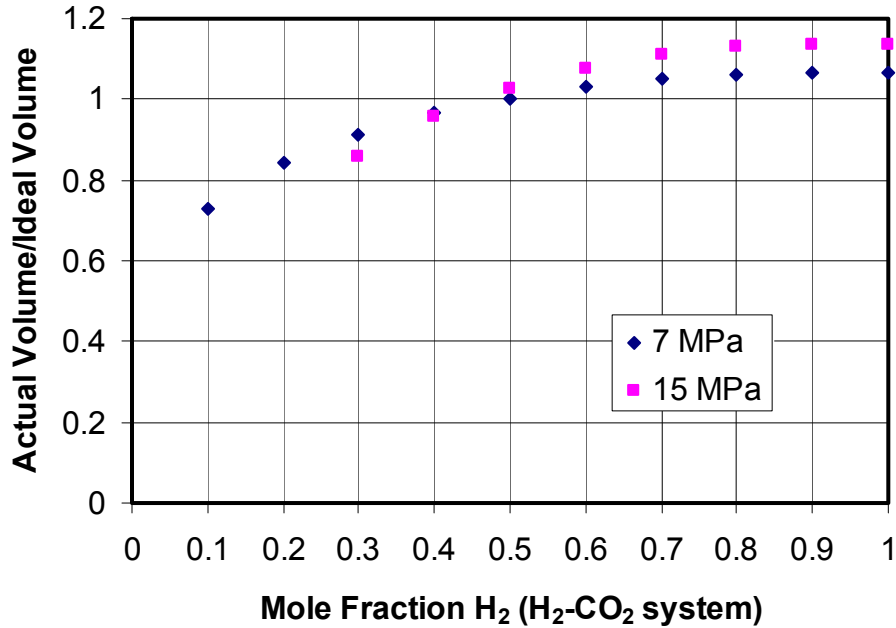
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The permeability of each component of the formation plays a significant role in determining both flow rate and pressure. Because marker bed (MB) permeabilities and Salado impure halite permeabilities vary over three to four orders of magnitude (see Kicker and Herrick 2013), the permeabilities of these flow pathways will have a greater influence on pressure and flow rate determinations than either uncertainty in viscosity or gas compressibility effects.



1
2 **Figure MASS-2. Gas Compressibility as a Function of Mole Fraction H₂**

3 Note that the BRAGFLO code includes a pressure-induced fracture model that will limit pressure
4 increases in the repository (Schreiber 1997). For example, at high repository pressures, the
5 factor of 1.5 pressure increase calculated here using the simplified Darcy’s Law model is
6 unlikely to be seen in the BRAGFLO results, since fracturing will lead to increased permeability,
7 effectively limiting pressure increases.

8 **MASS-3.3 Salado Brine as Surrogate for Liquid-Phase Physical Properties in**
9 **BRAGFLO**

10 BRAGFLO uses Salado Formation brine properties as the physical properties for all liquids.
11 However, liquid in the modeled region may consist of (1) brine originally in the Salado, (2)
12 liquid introduced in the excavation during construction, maintenance, and ventilation during the
13 operational phase, (3) a very small amount of liquid introduced as a component of the waste, (4)
14 liquid from overlying units, and (5) liquid from the Castile brine reservoir. However, for
15 BRAGFLO modeling, it is assumed that the properties of all of these liquids are similar enough
16 to Salado brine properties that the effect of any variation in properties resulting from liquids
17 mixing is negligible. The variations in chemical properties of brine are accounted for as
18 discussed in Appendix SOTERM-2014, Section SOTERM-2.0, Section SOTERM-2.3, and
19 Section SOTERM-5.0.

20

1 **MASS-4.0 Model Geometries**

2 This section presents supplementary information on the disposal system geometry, and includes
3 the representation of panel closures in that discussion. The principal process considered in
4 defining the repository geometry is fluid flow.

5 **MASS-4.1 Disposal System Geometry as Modeled in BRAGFLO**

6 The geometry used to represent long-term fluid flow processes in the Salado, flow between a
7 borehole and overlying units, and flow within the repository (where processes coupled to fluid
8 flow such as creep closure and gas generation occur), is a vertical cross section through the
9 repository on a north-south axis (see also Appendix PA-2014, Section PA-4.2.1). The dimension
10 of this geometry in the direction perpendicular to the plane of the cross section varies so that
11 spatial effects of repository processes can be represented. Using a two-dimensional geometry to
12 represent the three-dimensional Salado flow is based on the assumption that brine and gas flow
13 will converge upon and diverge from the repository horizon. Above and below the repository, it
14 is assumed that any flow between the borehole or shaft (see CRA-2004, Chapter 6.0, Section
15 6.4.3) and surrounding materials will converge or diverge. Grid flaring is used in the
16 BRAGFLO disposal system geometry, and flows are represented as divergent and convergent
17 from the flaring center (see Section MASS-4.1.1.4). The impact of this implementation in a two-
18 dimensional grid has been compared to a model that does not make the assumption of convergent
19 and divergent flow (see Appendix PA-2004, Attachment MASS, Attachment 4-1 for additional
20 information). The BRAGFLO representation of the Salado also includes the slight and variable
21 dip of beds in the vicinity of the repository. Below the repository, the possible presence of a
22 brine reservoir is considered to be important, so a hydrostratigraphic layer representing the
23 Castile and a possible brine reservoir in it is included (see the CCA, Appendix MASS, Section
24 MASS-4.2 for the disposal system geometry historical context prior to the CCA).

25 For modeling brine flow from the intruded panel to the borehole during drilling, the geometry
26 represented in BRAGFLO is a two-dimensional, horizontal representation of the repository waste
27 area as described in Section MASS-15.2.

28 Changes have been made to the disposal system geometry representation in BRAGFLO since
29 that implemented in the CCA. The evolution of these changes is discussed in the following
30 sections for the sake of completeness.

31 **MASS-4.1.1 CCA to CRA-2004 Baseline Grid Changes**

32 The baseline BRAGFLO grid used in the CCA PA and the CCA Performance Assessment
33 Verification Test (PAVT) had 33 cells in the x direction and 31 cells in the y direction, and is
34 shown in Figure MASS-3. Notably absent from the repository geometry are pillars, individual
35 drifts, and rooms. These were, and still are, excluded for simplicity, as well as the assumption
36 that they have either negligible impact on fluid-flow processes or, alternatively, that including
37 them would be beneficial to long-term repository performance.

CCA/PAVT Grid

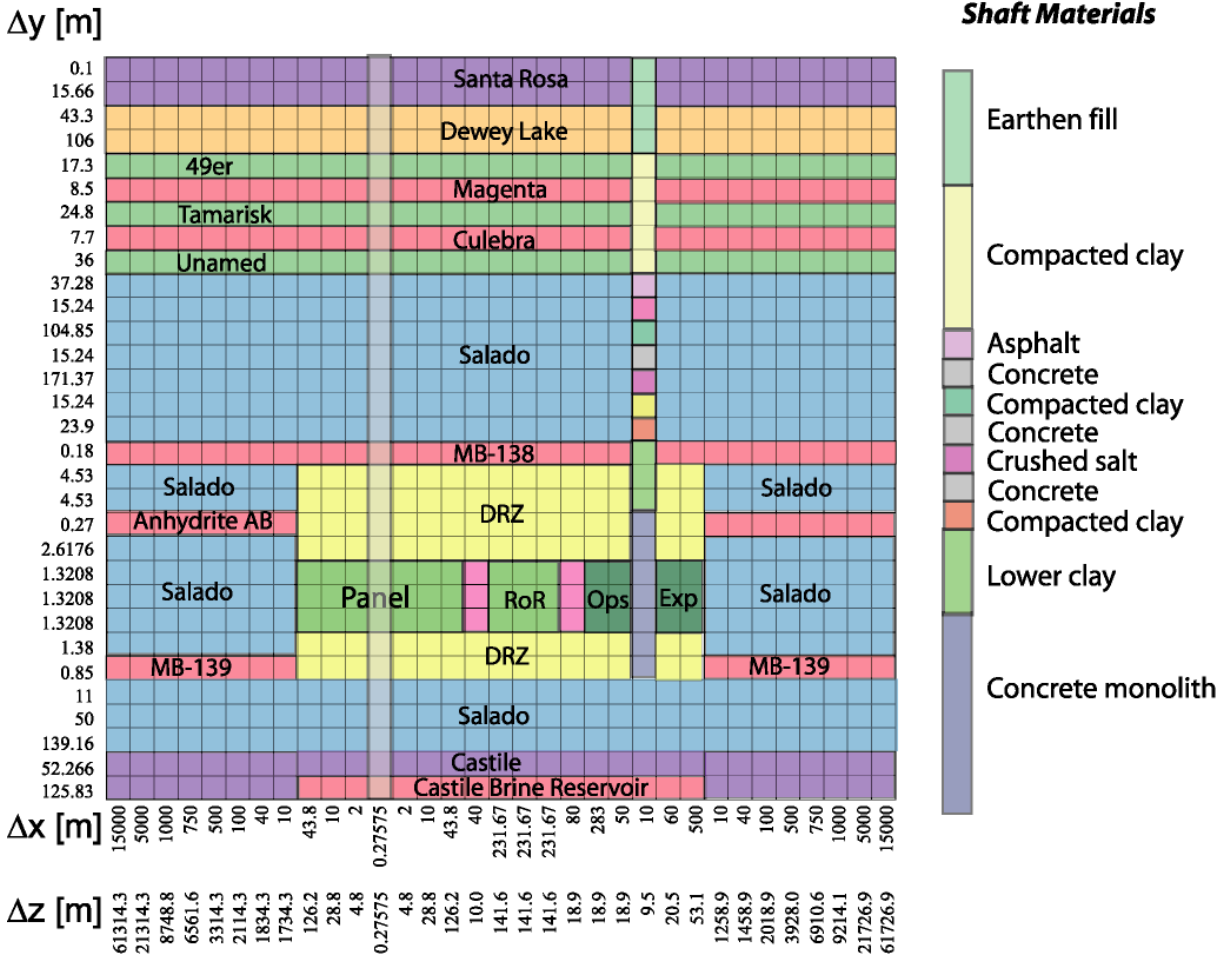


Figure MASS-3. Logical Grid Used for the CCA PA BRAGFLO Calculations

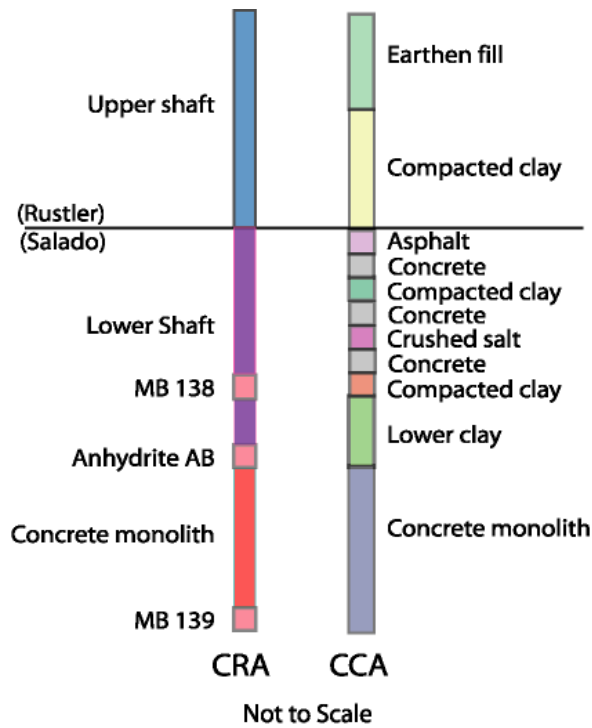
Several changes were made to the CCA numerical grid as part of the CRA-2004. These changes consisted of the following:

1. A simplified shaft seal model
2. Implementation of Option D-type panel closures
3. Increased segmentation of repository waste regions
4. Refinement to the grid-flaring method
5. Refinement to the x-spacing of the grid beyond the repository to the north and south
6. Refinements to the y-spacing of the grid as allowed by the revised shaft seal model

1 These changes were substantial enough so as to be designated as modifications to existing
 2 conceptual models used in the CRA and the CRA PAVT. All conceptual model changes were
 3 approved by the Salado Flow Peer Review Panel in February 2003 (Caporuscio, Gibbons, and
 4 Oswald 2003). These changes were made and approved by the EPA in the 2004 recertification
 5 decision (U.S. EPA 2006).

6 **MASS-4.1.1.1 CRA-2004 Simplified Shaft Seal Model**

7 A shaft seal model was included in the CRA-2004 grid, and was implemented in a simpler
 8 fashion than that used for the CRA PA and the CRA PAVT. A comparison of the shaft seal
 9 representations used in the CRA and the CRA-2004 is shown in Figure MASS-4. A detailed
 10 description of the parameters used to define the simplified model is discussed in AP-094 (James
 11 and Stein 2002) and the resulting analysis report (James and Stein 2003). The simplified shaft
 12 model was tested in the AP-106 calculations (Stein and Zelinski 2003a and Stein and Zelinski
 13 2003b). The results of this analysis demonstrated that brine flow through the simplified shaft
 14 model was comparable to brine flows through the detailed shaft model in the CRA PAVT
 15 calculations (see the CRA-2004, Chapter 9.0, Section 9.1.3.4), and that shaft seals are very
 16 effective barriers to flow throughout the 10,000-year regulatory period.



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Figure MASS-4. Comparison of the Simplified Shaft (CRA-2004) and the Detailed Shaft (CCA) Models

1 The shaft seal model used in the CRA-2004 PA is described by Stein and Zelinski (Stein and
 2 Zelinski 2003a and Stein and Zelinski 2003b), and was approved by the Salado Flow Peer
 3 Review Panel (Caporuscio, Gibbons, and Oswald 2003).

4 The CRA-2004 PA shaft representation was used in the CRA-2009 PA, and is also used in the
 5 CRA-2014 PA.

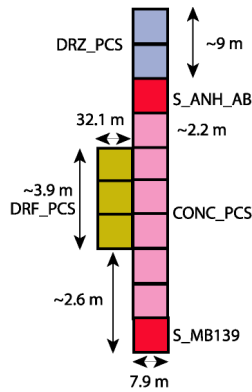
6 **MASS-4.1.1.2 CRA-2004 Implementation of Option D-Type Panel Closure**

7 The PA calculations that supported the CCA and the subsequent CCA PAVT calculations
 8 included generic panel closures in the BRAGFLO grid. The generic panel closures included in
 9 the CCA PA and the CCA PAVT calculations were relatively permeable and allowed gas to flow
 10 freely between panels. In the CCA PA and the CCA PAVT calculations, a drilling intrusion into
 11 a single panel generally caused pressures in the entire repository to decrease.

12 The DOE presented four panel closure design options (Options A through D) as part of the CCA.
 13 Upon reviewing the CCA, the EPA mandated the implementation of the Option D design. The
 14 Option D design consists of two components: a large monolith constructed of Salado Mass
 15 Concrete (SMC) that is keyed into the surrounding DRZ, and an explosion isolation wall
 16 constructed of concrete blocks, which is not keyed into the DRZ. For the CRA-2004, the true
 17 cross-sectional area of the Option D panel closure was represented in the flow model, and this
 18 implementation is described fully in Appendix PA-2004, Attachment MASS, Section MASS-
 19 4.2.4. Option D panel closures in the CRA-2004 were represented by the following four
 20 materials:

- 21 1. CONC_PCS: This material represents the concrete monolith, which has properties of SMC.
- 22 2. DRZ_PCS: This material represents the DRZ immediately above the concrete monolith that
 23 is expected to heal after the emplacement of the monolith.
- 24 3. DRF_PCS: This material represents the empty drift and explosion isolation wall portion of
 25 the panel closure. This material has the same properties as WAS_AREA (including creep
 26 closure).
- 27 4. MB materials S_ANH_AB and S_MB 139: These materials are the same as those used to
 28 represent the anhydrite MBs in other parts of the grid. MB materials were used because they
 29 have permeability ranges very close to the material CONC_PCS and in the case when
 30 pressures near the panel closures exceed the fracture initiation pressure of the MBs, fractures
 31 could extend around the concrete monolith out of the 2-D plane represented by the numerical
 32 grid. By using MB materials to represent the parts of the panel closures that intersect MBs,
 33 both the permeability of the closure and the potential fracture behavior of MB material near
 34 the closures are represented.

35 The logical grid representation of the Option D PCS implementation used in the CRA-2004 is
 36 shown in Figure MASS-5. The Option D PCS representation shown in that figure was also used
 37 in the CRA-2009 PA and CRA-2009 PABC. The Option D PCS is replaced by the ROMPCS in
 38 the CRA-2014 PA (see Section MASS-4.1.3).



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3 **Figure MASS-5. Logical Grid Representation of the Option D Panel Closures for the**
4 **CRA-2004**

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6 **MASS-4.1.1.3 Increased Segmentation of Waste Regions in Grid**

7 The CCA PA and the CCA PAVT grid divided the waste region into a single panel in the
8 southern end of the repository referred to as the Waste Panel, and a larger region containing the
9 other nine panels referred to as the rest of repository (RoR). The Waste Panel was intersected by
10 an intrusion borehole and was used to represent conditions in any panel intersected by a
11 borehole. Preliminary tests of the Option D panel closure representation (Hansen et al. 2002)
12 concluded that Option D panel closures were effective at impeding fluid flow between panels on
13 the order of thousands of years, but that, given enough time, pressures slowly equilibrated.
14 These results suggested that the effect of a single intrusion event on pressures in other panels
15 depends on the number of panel closures that lie between the intruded panel and the other panels.
16 Therefore, in the CRA-2004, the DOE divided the RoR region used in the CCA and PAVT into
17 northern and southern blocks separated by a set of panel closures. The south RoR block
18 represented conditions in a panel directly adjacent to an intruded panel. The north RoR block
19 represented conditions in a nonadjacent panel far from the intruded panel (i.e., at least two panel
20 closures are between it and the intruded panel). The panel closure between the north and south
21 RoR represented a set of four panel closures located between the northern and southern internal
22 extended panels. This representation assumed that the effects of drilling intrusions are damped
23 in non-intruded panels, and the degree of damping depends on the proximity of the drilling
24 intrusion and the number of panel closures separating the intruded panel from other regions of
25 the repository. The CRA-2009 PA and CRA-2009 PABC used the same segmentation of the
26 waste regions as in the CRA-2004 PA (see Appendix PA-2004, Attachment MASS, Section
27 MASS-4.2.4 for a description of waste-region segmentation). The CRA-2014 PA also uses the
28 waste region segmentation developed during the CRA-2004.

29 **MASS-4.1.1.4 CRA-2004 Refinement to the Grid Flaring Method**

30 Grid flaring is a method to represent three-dimensional volumes in a two-dimensional grid.
31 Flaring is used when flows can be represented as divergent and convergent from the center of
32 flaring. The CCA PA and CCA PAVT grids used flaring at two different scales: locally around

1 the borehole and shaft, and regionally to the north and south of the excavated regions (around a
2 point in the northern end of the RoR). For the CRA-2004 PA, the local flaring around the
3 borehole was the same as in the CCA PA/CCA PAVT grid. The local flaring around the shaft
4 was eliminated as it had been demonstrated to not be a release pathway. Likewise, the
5 calculation of regional flaring was simplified. The CRA-2009 PA used the same grid flaring as
6 in the CRA-2004 PA (see Appendix PA-2004, Attachment MASS, Section MASS-4.2.5 for a
7 description of grid flaring). The same grid flaring method is used in the CRA-2014.

8 **MASS-4.1.1.5 CRA-2004 Refinement of the X-Spacing Outside the Repository**

9 The grid blocks to the north and south of the excavated region were refined in the x-direction
10 during the CRA-2004. The x-dimension of grid cells immediately to the north and south of the
11 repository were set to 2 m. Cell x-lengths were then increased by a factor of 1.45 toward the
12 north and south.

13 Exceptions to this algorithm were made to ensure that the location of the Land Withdrawal
14 Boundary and the total extent of the grid matched that of the CCA PA and CCA PAVT grids.
15 This CRA-2004 PA refinement to the X-spacing of grid cells outside of the repository was
16 chosen to reduce numerical dispersion caused by rapid increases in cell dimensions (Anderson
17 and Woessner 1992; Wang and Anderson 1982). The CRA-2009 PA used this refinement, as
18 does the CRA-2014 PA.

19 **MASS-4.1.1.6 CRA-2004 Refinement of the Y-Spacing**

20 During the CRA-2004 PA, grid spacing in the y direction for layers representing the Salado were
21 changed from the CCA PA/CCA PAVT grid spacing. The Salado grid spacing used in the CCA
22 PA was dictated by the thickness of different shaft seal materials. The simplification of the shaft
23 seal representation used in the CRA-2004 allowed for uniform y-spacing in the Salado region of
24 the grid. In addition, two layers were added immediately above and below MB 139 to refine the
25 grid spacing and reduce numerical dispersion. These changes resulted in a total of 33 y divisions
26 for the grid, and increased the numerical accuracy of flow and transport calculations.

27 The x- and y-direction refinements used in the CRA-2004 PA grid were included in the CRA-
28 2009 PA, and are also included in the CRA-2014 PA.

29 **MASS-4.1.1.7 CRA-2004 BRAGFLO Material Map and Numerical Grid**

30 The combined changes to the BRAGFLO disposal system geometry developed during the CRA-
31 2004 resulted in the BRAGFLO material map and numerical grid shown in Figure MASS-6. The
32 grid shown in that figure has 68 grid cells in the x direction and 33 cells in the y direction.

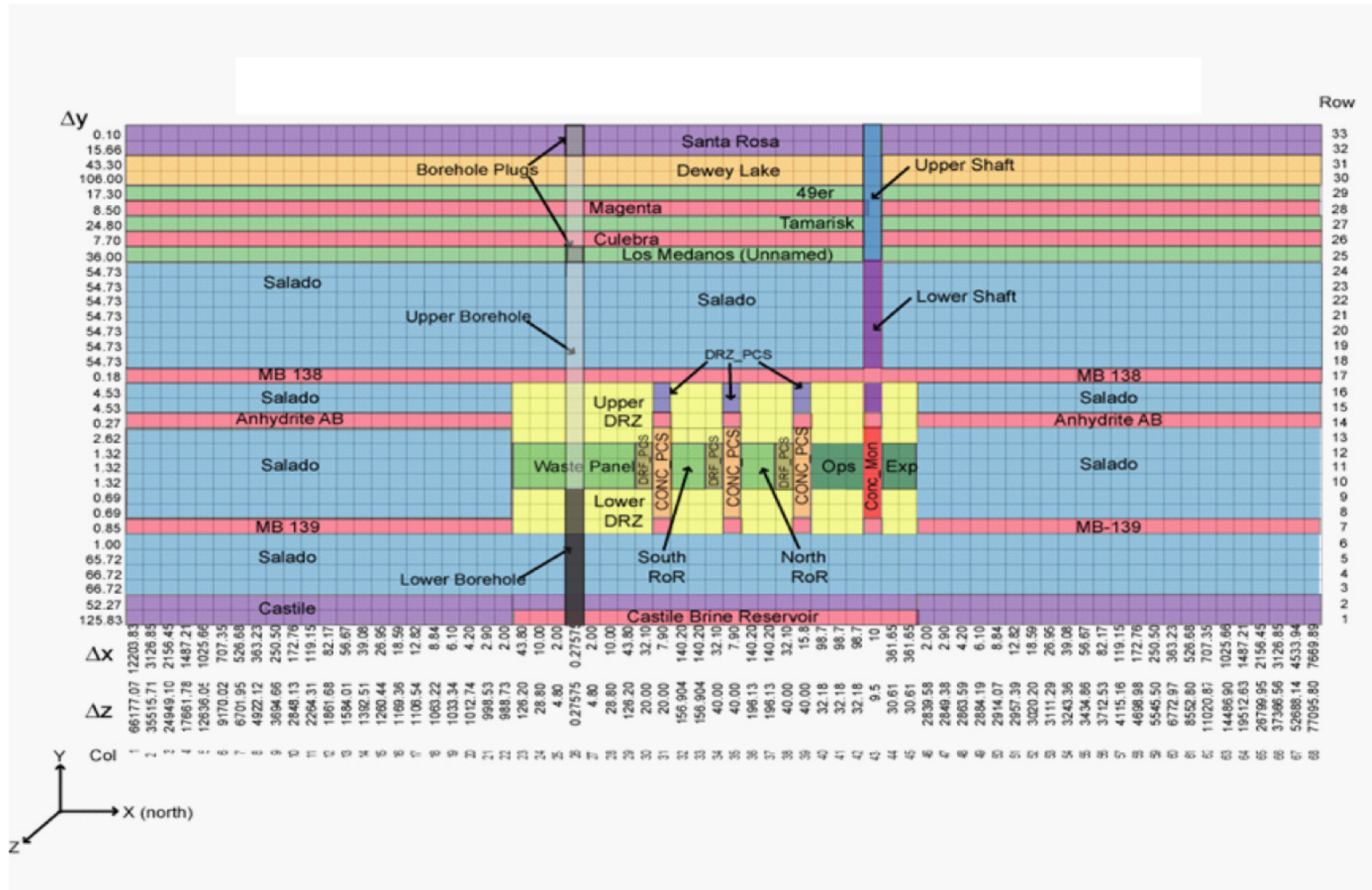


Figure MASS-6. CRA-2004 BRAGFLO Grid and Material Map (Δx , Δy , and Δz dimensions in meters)

1 **MASS-4.1.2 CRA-2004 to CRA-2009 Baseline Grid Changes**

2 No changes were made to the BRAGFLO repository geometry developed during the CRA-2004
3 as part of the CRA-2009. The CRA-2009 PA used the BRAGFLO material map and numerical
4 grid shown in Figure MASS-6.

5 **MASS-4.1.3 CRA-2009 to CRA-2014 Baseline Grid Changes**

6 The BRAGFLO material map and numerical grid used in the CRA-2014 PA is very similar to
7 that developed during the CRA-2009. The primary change incorporated in the CRA-2014
8 BRAGFLO repository representation is the replacement of the Option D PCS with the
9 ROMPCS. Added volume in the repository experimental area also slightly alters the BRAGFLO
10 grid used in the CRA-2014 PA.

11 The WIPP waste panel closures comprise a feature of the repository that has been represented in
12 WIPP PA regulatory compliance demonstration since the CCA. Following the selection of the
13 Option D panel closure design in 1998, the DOE has reassessed the engineering of the panel
14 closure and established a revised design which is simpler, easier to construct, and equally
15 effective at performing its operational-period isolating function. The revised design is the
16 ROMPCS, and is comprised of 100 ft of ROM salt with barriers at each end. The barriers consist
17 of ventilation bulkheads, and are similar to those used in the panels as room closures. The
18 ventilation bulkheads are designed to restrict air flows and prevent personnel access into waste-
19 filled areas during the operational phase of the repository. The ventilation bulkheads are
20 expected to have no significant impact on long-term performance of the panel closures and are
21 therefore not included in the representation of the ROMPCS. Option D explosion isolation walls
22 fabricated from concrete blocks have been emplaced in the entries of waste panels 1, 2, and 5,
23 and replace the bulkheads on the waste side of the closure. It is expected that these walls will not
24 be significant structures after the initial 100-year time period, due to the brittle, non-plastic
25 behavior of concrete. The already emplaced explosion isolation walls are therefore expected to
26 have no significant impact on long-term panel closure performance, and so are also not included
27 in the representation of the ROMPCS. Consequently, the ROMPCS is modeled as consisting of
28 100 ft of ROM salt in the CRA-2014 PA.

29 ROMPCS properties in the CRA-2014 PA are based on three time periods (see Camphouse et al.
30 2012). Consequently, the ROMPCS is represented by three materials, with each material
31 representing the ROMPCS for a portion of the 10,000-year regulatory period. Material PCS_T1
32 represents the ROMPCS for the first 100 years after facility closure. Material PCS_T2 models
33 the ROMPCS from 100 to 200 years. Finally, material PCS_T3 represents the ROMPCS from
34 years 200 to 10,000. For the first 200 years post-closure, the DRZ above and below the
35 ROMPCS maintains the same properties as specified to the DRZ surrounding the disposal rooms
36 (PA material DRZ_1). After 200 years, the DRZ above and below the ROMPCS is modeled as
37 having healed, and is represented by material DRZ_PCS. Materials DRZ_1 and DRZ_PCS have
38 the same properties in the CRA-2014 PA as were assigned to them in the CRA-2009 PA. As
39 previously discussed, segments of interbed material were included in the PA representation of
40 the Option D panel closure, and are also included in the CRA-2014 PA representation of the
41 ROMPCS.

1 The temporal evolution of the ROMPCS in BRAGFLO for the CRA-2014 PA is illustrated in
2 Figure MASS-7 to Figure MASS-9. As seen in Figure MASS-7 and Figure MASS-8, the only
3 change in the BRAGFLO grid and material map for time periods 0 to 100 years and 100 to 200
4 years is the material used to represent the panel closure. Material PCS_T1 is used to represent
5 the ROMPCS for years 0 to 100, while material PCS_T2 represents the panel closure for years
6 100 to 200. As discussed above, the ROMPCS is modeled as having no impact on the DRZ
7 above and below the closure for the first 200 years after emplacement. For the first 200 years,
8 the DRZ material above and below the closure in the BRAGFLO material map is the same as the
9 material above and below other repository regions. After 200 years, the material used to
10 represent the ROMPCS changes to PCS_T3, and the regions of healed DRZ above and below the
11 closure is modeled by material DRZ_PCS, as shown in Figure MASS-9. The repository
12 representation shown in Figure MASS-9 is used for times between 200 years and the time of
13 intrusion. The BRAGFLO grid and element maps corresponding to particular intrusion types are
14 shown in Figure MASS-10 and Figure MASS-11.

15 The inclusion of the ROMPCS and additional mined volume in the repository north end slightly
16 alters some of the element widths in the CRA-2014 BRAGFLO grid as compared to those used
17 in the CRA-2004 and CRA-2009. The Option D panel closure implemented in the CRA-2004
18 and CRA-2009 is 40 m long, while the ROMPCS implemented in the CRA-2014 PA is 30.48 m
19 (100 ft) long. Consequently, the panel closure length is reduced to a value of 30.48 m in the
20 CRA-2014 PA, with panel closures represented by two elements in the x direction, each 15.24 m
21 long. Similarly, elements corresponding to the repository experimental area are lengthened in
22 the z direction to account for additional mined volume in that region. Two element lengths of
23 30.61 m in the z direction were used to represent the repository experimental area in the CRA-
24 2009 PA. These two lengths are increased to 51.67 m and 51.68 m in the CRA-2014 PA to
25 account for the additional mined volume in the experimental area.

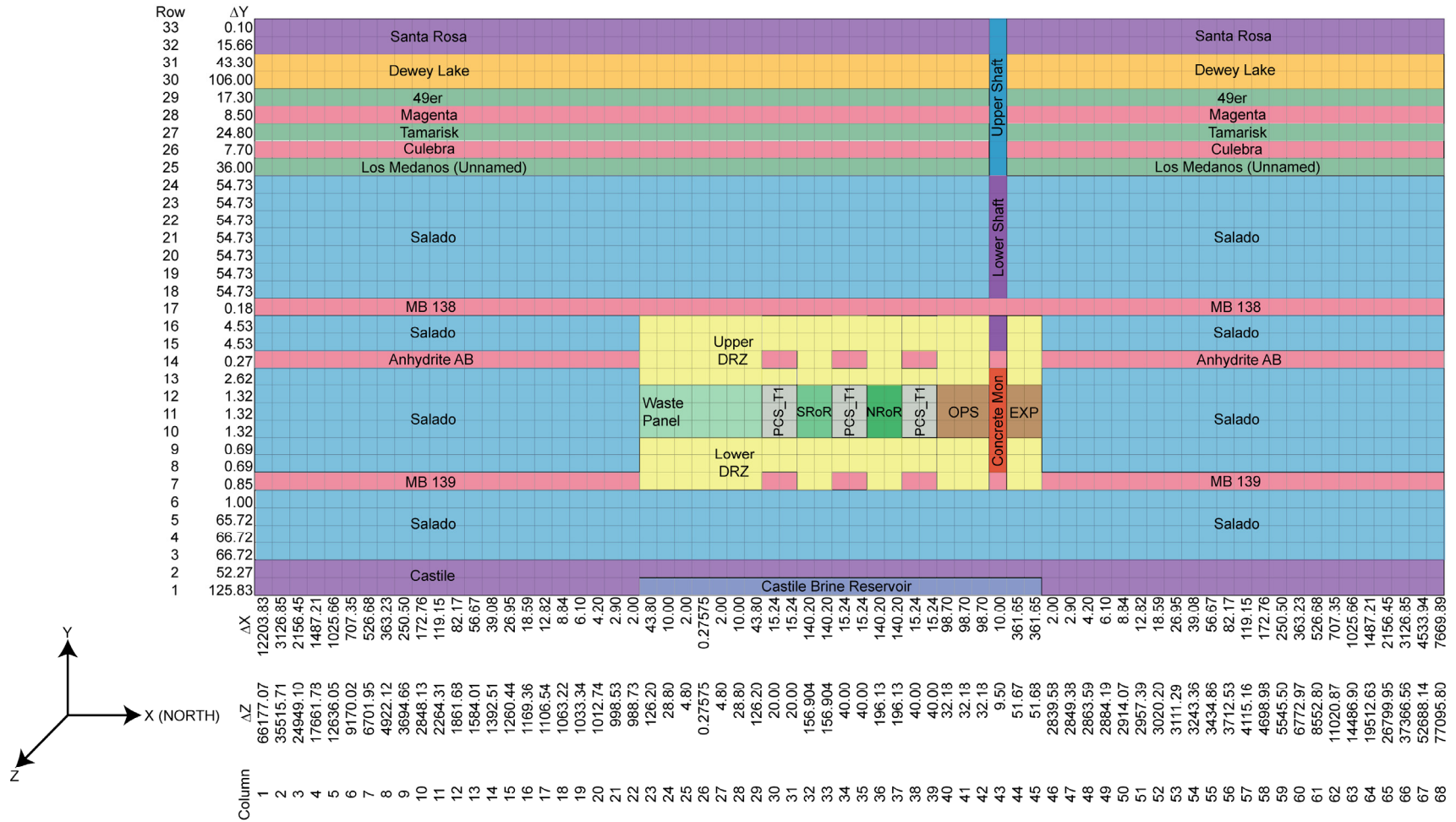


Figure MASS-7. CRA-2014 PA BRAGFLO Grid and Material Map, Years 0 to 100

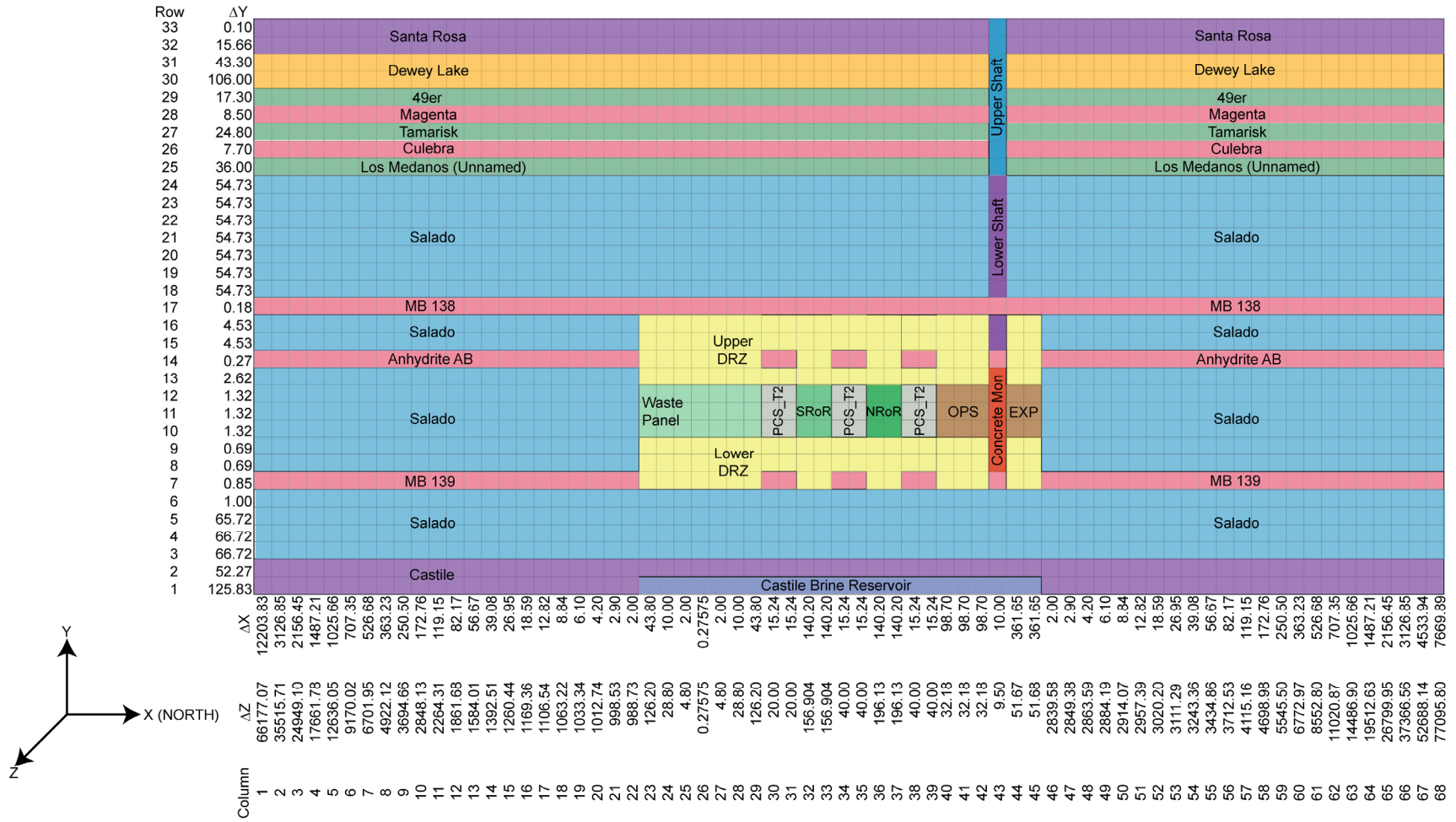
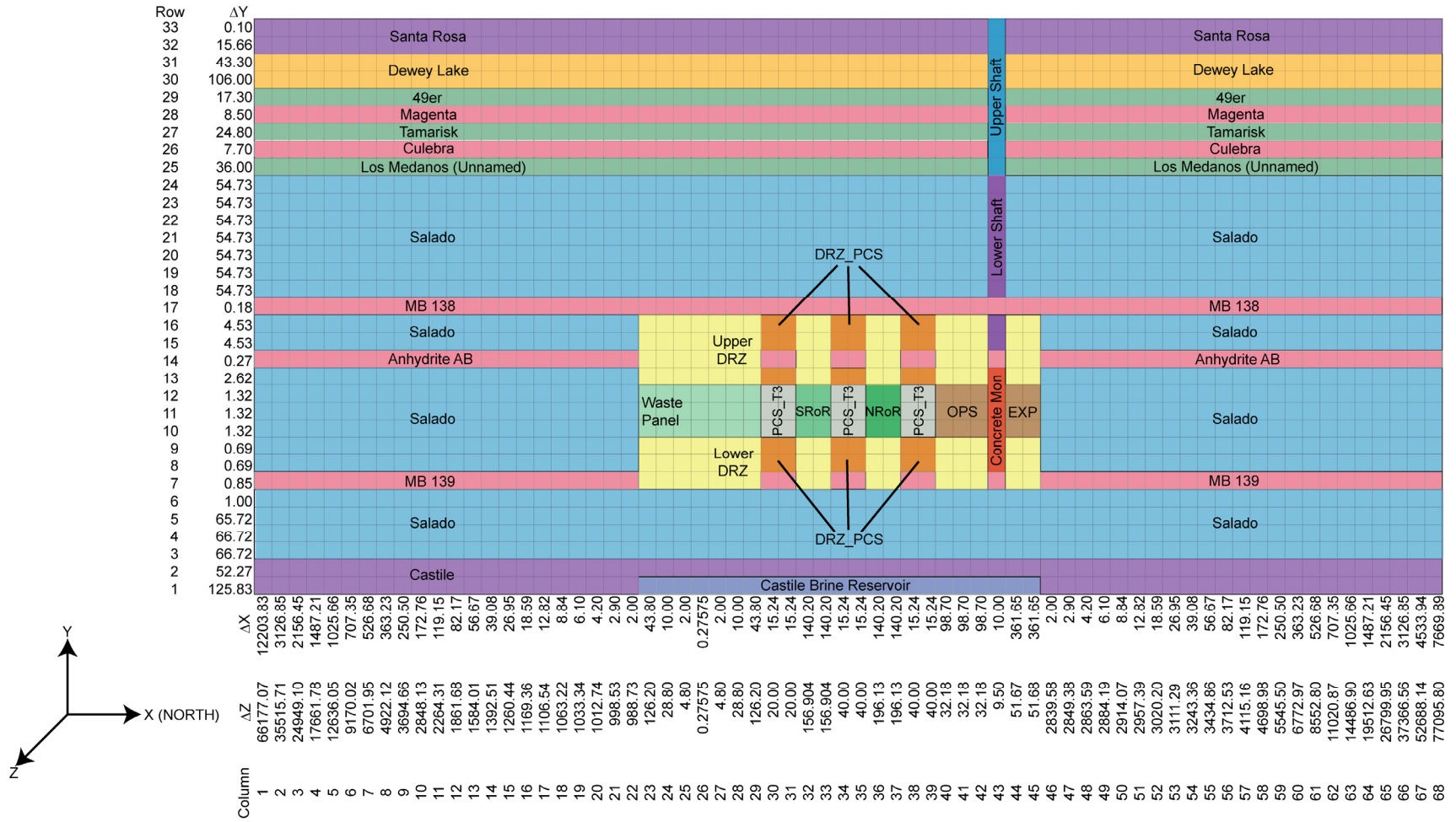
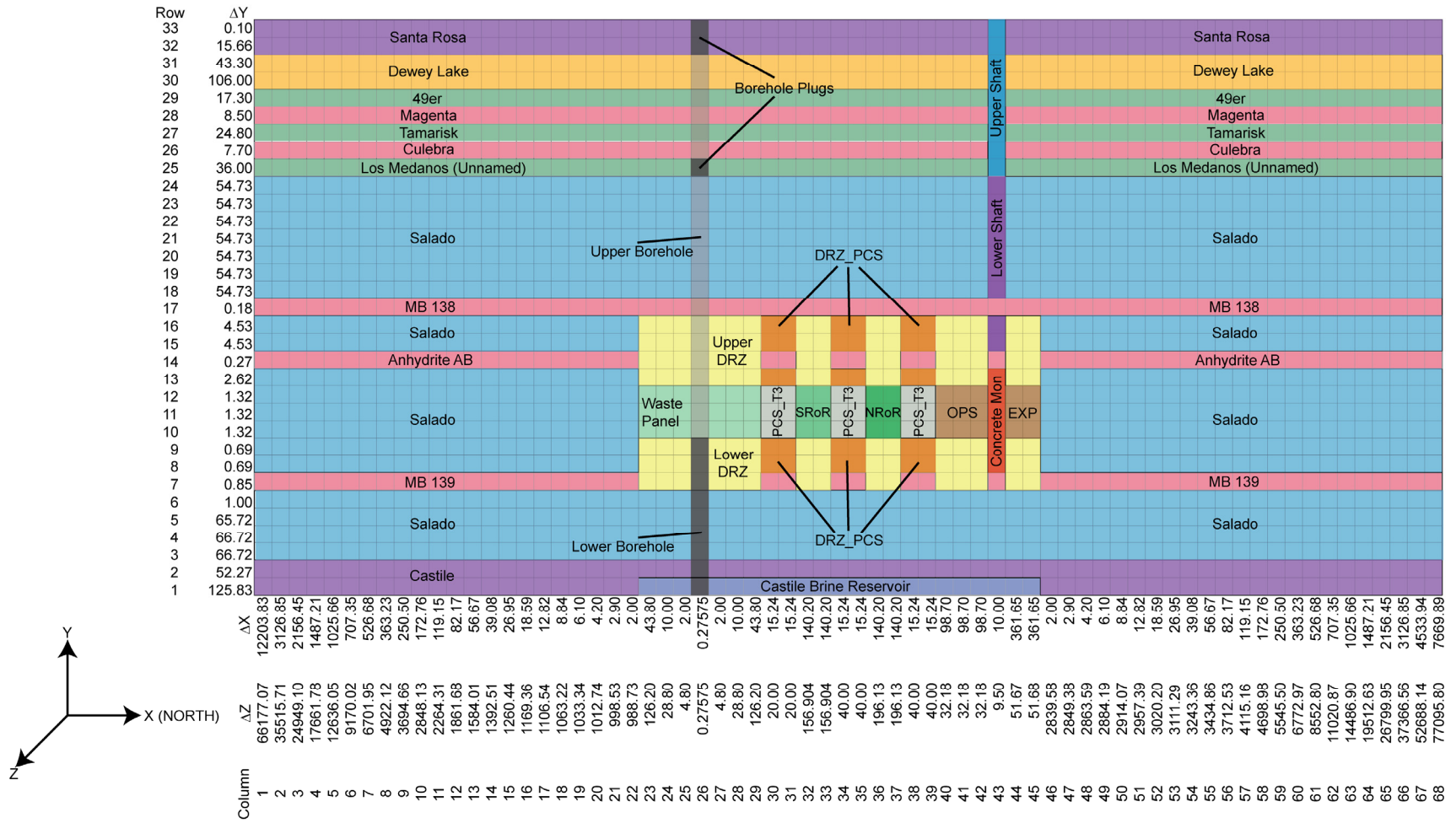


Figure MASS-8. CRA-2014 PA BRAGFLO Grid and Material Map, Years 100 to 200



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Figure MASS-9. CRA-2014 PA BRAGFLO Grid and Material Map, Years 200 to Time of Intrusion



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Figure MASS-10. CRA-2014 PA BRAGFLO Grid and Material Map for an E1 Intrusion

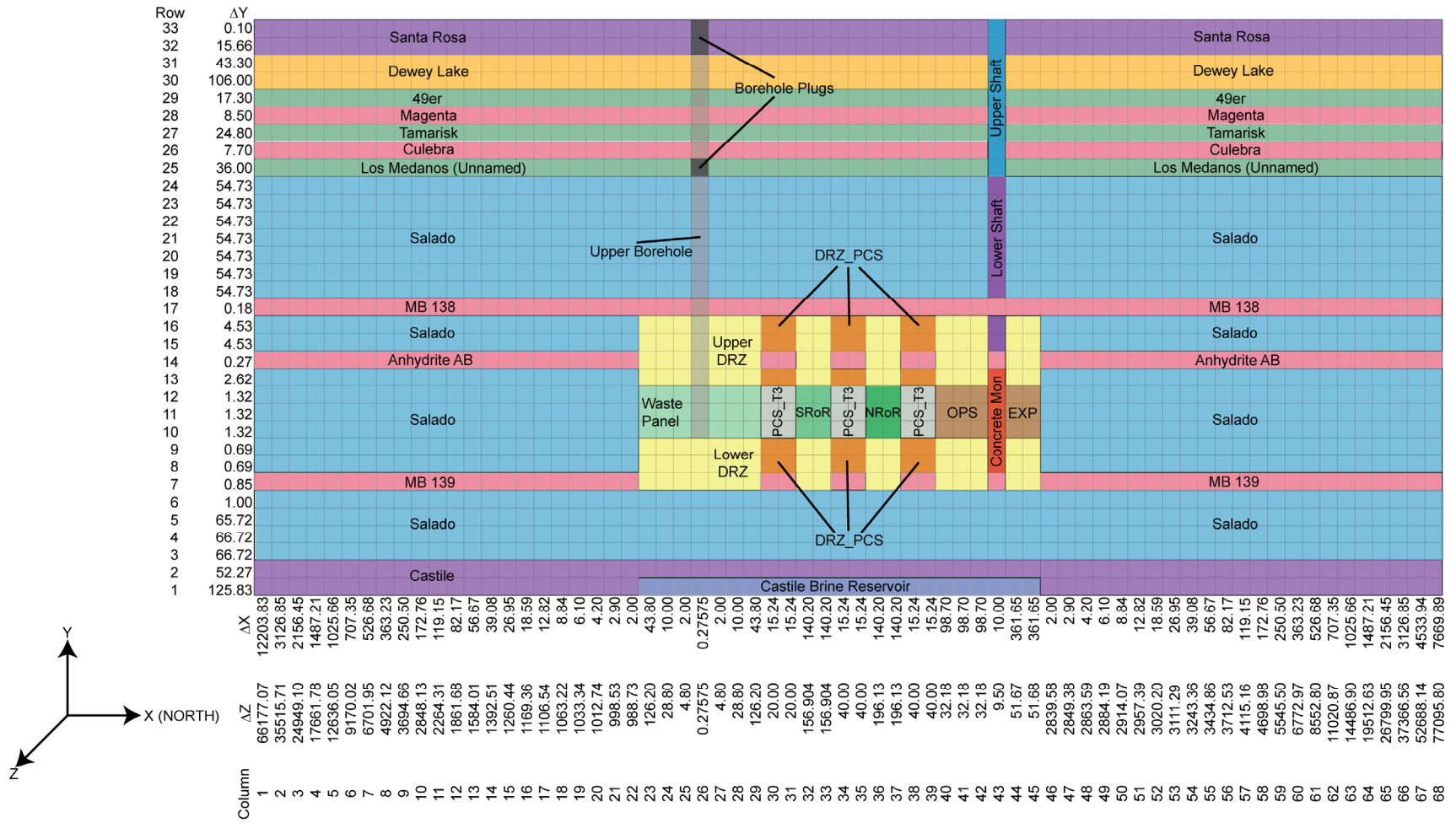


Figure MASS-11. CRA-2014 PA BRAGFLO Grid and Material Map for an E2 Intrusion

1 **MASS-5.0 Creep Closure**

2 The creep closure model used in the CRA-2014 is the same as that used in the CRA-2009 and the
3 CRA-2009 PABC. The model used for creep closure of the repository is discussed in Appendix
4 PORSURF-2014. Historical information on creep closure modeling is also contained in
5 Appendix PORSURF-2014.

6 **MASS-6.0 Repository Fluid Flow**

7 Most repository fluid flow assumptions have not changed from those used in the CRA-2009
8 PABC. Those that did not change are discussed in Section MASS-6.1 and Section MASS-6.2,
9 while those that did change are discussed in Section MASS-6.3. The Repository Fluid Flow
10 conceptual model represents the long-term flow behavior of liquid and gas in the repository and
11 its interaction with other regions in which fluid flow may occur, such as the Salado, shafts, or an
12 intrusion borehole. This model is not used to represent the interaction of fluids in the repository
13 with a borehole during drilling. Historical information on alternative conceptual models for
14 brine inflow to the repository is contained in the CCA, Appendix MASS, Section MASS-7.0.

15 The first principle in the conceptual model for fluid flow in the repository is that gas and brine
16 can both be present and mobile (two-phase flow), governed by conservation of energy and mass
17 and by Darcy's Law for their fluxes (see Appendix PA-2014, Section PA-4.2). Consistent with
18 typical concepts of two-phase flow, the phases can affect each other by impeding flow caused by
19 partial saturation (relative permeability effects) and by affecting pressure caused by capillary
20 forces (capillary pressure effects).

21 The flow of brine and gas in the repository is assumed to behave as two-phase, immiscible,
22 Darcy flow (see Appendix PA-2014, Section PA-4.2). BRAGFLO is used to simulate brine and
23 gas flow in the repository and to incorporate the effects of disposal-room closure and gas
24 generation. Fluid flow in the repository is affected by the following factors:

- 25 • The geometric association of pillars, rooms, and drifts; waste panel consolidation due to salt
26 creep; and possible borehole locations
- 27 • The varied properties of the waste areas resulting from creep closure and heterogeneous
28 contents
- 29 • Flow interactions with other parts of the disposal system
- 30 • Reactions that generate gas

31 The geometry of the panel around the intrusion borehole is consistent with the assumption that
32 the fluid flow there will occur directly toward or directly away from the borehole. The geometry
33 represents a semicircular volume north of the borehole and a semicircular volume south of the
34 borehole (representing radial flow in a subregion of a two-dimensional representation of the
35 repository).

1 Approximating convergent and divergent flow around the intrusion borehole creates a narrow
2 neck in the otherwise fairly uniform numerical grid in the region representing the repository. In
3 the undisturbed performance scenario, and under certain conditions in other scenarios, flow in
4 the repository may pass laterally through this neck. In reality, this neck does not exist. Its
5 presence in the model is expected to have a negligible or conservative impact on model
6 predictions compared to predictions that would result from a more realistic model geometry.
7 The time scale involved and the permeability contrast between the repository and surrounding
8 rock are sufficient so that the lateral flow that may occur in the repository is restricted by the rate
9 at which liquid gets into or out of the repository, rather than by the rate at which it flows through
10 the repository.

11 Gas generation is affected by the quantity of liquid in contact with metal and CPR waste
12 materials. However, the distribution of fluid in the repository can only be approximated. For
13 example, capillary action can create wicking that would increase the overall region in which gas
14 generation occurs, but modeling this at the necessary resolution to simulate these processes
15 would greatly increase the time required to carry out the modeling (Appendix PA-2014, Section
16 PA-4.2.6, and CRA-2004, Section 6.4.3.3). Therefore, as a bounding measure for gas generation
17 purposes, brine in the repository is distributed to an extent greater than estimated by the Darcy
18 flow models or by the values of parameters chosen.

19 Modeling of flow within the repository is based on homogenizing the room contents into
20 relatively large computational volumes. The approach ignores heterogeneities in disposal room
21 contents that may influence gas and brine behavior by causing fluid flow among channels or
22 creating preferential paths in the waste, bypassing entire regions. Isolated regions could exist for
23 several reasons:

- 24 • They may be isolated by low-permeability regions of waste that serve as barriers.
- 25 • Connectivity with the interbeds may occur only at particular locations within the repository.
- 26 • The repository dip may promote preferential gas flow in the upper regions of the waste.

27 For the CCA, the adequacy of the repository homogeneity assumption was examined in
28 screening analyses DR-1 (Webb 1995) and DR-6 (Vaughn, Lord, and MacKinnon 1995a). These
29 analyses used an additional parameter in BRAGFLO to specify the minimum active (mobile)
30 brine flow saturation (pseudoresidual brine saturation). Above this saturation, the normal
31 descriptions of two-phase flow apply (i.e., either the Brooks and Corey or van Genuchten and
32 Parker relative permeability models). Below this minimum, brine is immobile, although it is
33 available for reaction and may still be consumed during gas-generation reactions. The
34 assumption of a minimum saturation limit was justified based on the presumed heterogeneity of
35 the waste and the slight dip in the repository. The minimum active brine saturation was treated
36 as an uncertain parameter and sampled uniformly between the values 0.1 and 0.8 during the
37 analysis. This saturation limit was applied uniformly throughout the disposal room to bound the
38 impact of heterogeneities on flow (Webb 1995; Vaughn, Lord, and MacKinnon 1995a). Results
39 of this analysis showed that releases to the accessible environment in the baseline case
40 (homogenization) are consistently higher.

1 The experimental and operations regions were represented in the CCA PA by a fixed porosity of
2 18.0% and a permeability of 10^{-11} m². The combination of low porosity and high permeability
3 conservatively overestimated fluid flow through these regions and limited the capacity of these
4 regions to store fluids, potentially overestimating releases to the environment. This conclusion
5 was based on a screening analysis (Vaughn, Lord, and MacKinnon 1995b) that examined the
6 importance of permeability varying with porosity in closure regions (waste disposal region,
7 experimental region, and operations region). To perform this analysis, a model for estimating
8 the change in permeability with porosity in the closure regions was implemented in BRAGFLO.
9 A series of BRAGFLO simulations was performed to determine whether permeability varying
10 with porosity in the closure regions could enhance contaminant migration to the accessible
11 environment. Two basic scenarios were considered in the screening analysis: undisturbed
12 performance and disturbed performance. To assess the sensitivity of system performance on
13 dynamic permeability in the closure regions, CCDFs of normalized contaminated brine releases
14 were constructed and compared with the corresponding baseline conditional CCDFs. The
15 baseline model treated permeabilities in the closure regions as fixed values. Results of this
16 analysis showed that the inclusion of dynamic closure of the waste disposal region, experimental
17 region, and operations region in BRAGFLO resulted in computed releases to the accessible
18 environment that are essentially equivalent to the baseline case.

19 A separate analysis (Park and Hansen 2003) examined the possible effects of heterogeneity in
20 waste container and waste material strength on room closure. The analysis of room closure
21 found that the room porosity may vary widely depending on the type of waste container and the
22 emplacement of waste in the repository. However, analysis of a separate PA (Hansen et al.
23 2003) found that PA results are relatively insensitive to the uncertainty in room closure and room
24 porosity. The conclusions of the separate PA are summarized in Section MASS-19.0 of this
25 appendix.

26 **MASS-6.1 Flow Interactions with the Creep Closure Model**

27 The dynamic effect of halite creep and room consolidation on room porosity is modeled only in
28 the waste disposal region. Other parts of the repository, such as the experimental region and the
29 operations region, are modeled assuming fixed (invariant with time) properties. In these regions,
30 the permeability is held at a fixed high value representative of unconsolidated material, while the
31 porosity is maintained at relatively low values associated with highly consolidated material. This
32 combination of low porosity and high permeability is assumed to conservatively overestimate
33 flow through these regions and minimize the capacity of this material to store fluids, thus
34 maximizing the release to the environment. To examine the acceptability of this assumption, a
35 screening analysis (Vaughn, Lord, and MacKinnon 1995c) evaluated the effect of including
36 closure of the experimental region and operations region. In this analysis, consolidation of the
37 experimental region and operations region was implemented in BRAGFLO by relating pressure
38 and time to porosity using a porosity-surface method. The porosity surface for the experimental
39 region and operations region differs from the surface used for consolidation of the disposal room
40 and is based on an empty excavation (see Appendix PORSURF-2014). The screening analysis
41 showed that disregarding dynamic closure of the experimental region is acceptable because it is
42 conservative: lower releases occur when closure of the experimental region and operations
43 region is computed compared to simulations with time-invariant high permeability and low
44 porosity.

1 **MASS-6.2 Flow Interactions with the Gas Generation Model**

2 Gas generation affects repository pressure, which in turn is an important parameter in other
3 processes such as two-phase flow, creep closure, and fracturing of the interbeds and DRZ. Gas-
4 generation processes considered in PA calculations include anoxic corrosion and microbial
5 degradation. Radiolysis is excluded from PA calculations on the basis of laboratory experiments
6 and a screening analysis (Vaughn et al. 1995) that concluded that radiolysis does not
7 significantly affect repository performance.

8 In modeling gas generation, the effective liquid in a computational cell is the computed liquid in
9 that cell plus an adjustment for the uncertainty associated with wicking by the waste (see
10 Appendix PA-2014, Section PA-4.2.6). Capillary action (wicking) is the ability of a material to
11 carry a fluid by capillary forces above the level it would normally seek in response to gravity.
12 Because the current gas-generation model computes substantially different gas-generation rates
13 depending on whether the waste is wet or merely surrounded by water vapor, the physical extent
14 of wetting could be important. A screening analysis (Vaughn, Lord, and MacKinnon 1995d)
15 examined wicking and concluded that it should be included in PA calculations.

16 The baseline gas-generation model in BRAGFLO accounts for corrosion of iron and microbial
17 degradation of cellulose and possibly plastics and rubber. The net reaction rate of these
18 processes depends directly on brine saturation: an increase in brine saturation will increase the
19 net reaction rate by weighting the inundated portion more heavily and the slower humid portion
20 less heavily. To simulate the effect of wicking on the net reaction rate, an effective brine
21 saturation, which includes a wicking saturation contribution, is used to calculate reaction rates
22 rather than the actual brine saturation (see Appendix PA-2014, Section PA-4.2.6).

23 **MASS-6.3 Changes to Flow Interactions with the Gas-Generation Model in** 24 **the CRA-2014**

25 The CRA-2014 includes a refinement to the repository water balance implementation as
26 compared to that used in the CRA-2009 PABC. The main objective of refining the repository
27 water balance is to include the major gas and brine producing and consuming reactions in the
28 existing conceptual model. As described in the Chemical Conditions Conceptual Model, the
29 major reactions in the repository include the reactions of CPR, iron, and MgO with brine (U.S.
30 DOE 2004, sections PEER-2004 1.1.3, PEER-2004 1.1.4 and PEER-2004 1.1.5). In the CRA-
31 2014, the same biodegradation pathways are included as were implemented in the CRA-2009
32 PABC, but the generation of water in these pathways is also considered. The reaction of iron
33 hydroxide with hydrogen sulfide, which consumes gas and produces water, is also included. It is
34 assumed that the hydrogen sulfide preferentially reacts with the iron hydroxide versus metallic
35 iron. MgO reactions are expanded in the CRA-2014 to include MgO hydration, which consumes
36 water and produces brucite, and the carbonation of brucite, which is assumed to form
37 hydromagnesite. It is assumed that the carbon dioxide preferentially reacts with the brucite
38 versus the dry MgO. Since hydromagnesite is not thermodynamically stable under repository
39 conditions, it is assumed to dehydrate to form magnesite. As a result, the reaction of
40 hydromagnesite to form magnesite, which produces water, is also included in the CRA-2014.
41 All chemical reactions and species are tracked on a cell-by-cell basis. There is a finite amount of
42 each chemical species in each cell. Once any of them are used up, that particular reaction ceases.

1 The WIPP PA codes PREBRAG v8.02 and BRAGFLO v6.02 have been developed and qualified
2 for this refinement to the repository water balance, and are used in the CRA-2014 PA. The
3 reactions that comprise the refinement to the repository water balance implementation are more
4 fully discussed in Appendix PA-2014, Section PA-4.2.5.

5 **MASS-7.0 Gas Generation**

6 The gas generation model represents the possible generation of gas in the repository by corrosion
7 of steel and microbial degradation of CPR materials. The CRA-2009 used the CRA-2004 PABC
8 gas generation modeling assumptions, as does the CRA-2014. Additional discussion of this
9 topic may be found in Appendix PA-2014, Section PA-4.2.5 and Appendix SCR-2014 (FEPs
10 W44 through W48, W53, and N71) and the CRA-2004, Chapter 6.0, Section 6.4.3.3.

11 **MASS-7.1 Historical Context of Gas Generation Modeling**

12 See the CCA, Appendix MASS, Section MASS-8.1 for historical information on the
13 development of the CCA gas-generation conceptual model.

14 **MASS-8.0 Chemical Conditions**

15 The modeling assumptions of chemical conditions used in the CRA-2014 are unchanged from
16 those used in the CRA-2009 PABC. The implementation now includes the refined water budget
17 discussed in MASS-6.3 and the variable brine volume discussed in MASS-2.6.10. The models
18 used for chemical conditions in the repository are discussed in Appendix MgO-2014, Appendix
19 SOTERM-2014, and Appendix PA-2014.

20 **MASS-9.0 Dissolved Actinide Source Term**

21 The dissolved actinide source term modeling assumptions used in the CRA-2009 were
22 unchanged from those used in the CRA-2004 PABC, and remain unchanged in the CRA-2014.
23 The models used for the dissolved actinide source term in the repository are discussed in
24 Appendix SOTERM-2014, Section SOTERM-4.0 and Section SOTERM-5.0.

25 **MASS-10.0 Colloidal Actinide Source Term**

26 The colloidal actinide source term modeling assumptions used in the CRA-2009 were unchanged
27 for the CRA-2014, but the model parameters are updated for the CRA-2014. The models used
28 for the colloidal actinide source, and actinide source term updates included in the CRA-2014, are
29 discussed in Appendix SOTERM-2014, Section SOTERM-5.0.

30 **MASS-11.0 Shafts and Shaft Seals**

31 The shafts and shaft seals modeling assumptions used in the CRA-2009 were unchanged from
32 those used in the CRA-2004 PABC, and remain unchanged in the CRA-2014. The models used
33 for shafts and shaft seals are discussed in Appendix PA-2004, Attachment MASS, Section
34 MASS-12.0.

1 **MASS-12.0 Salado**

2 The far-field Salado modeling assumptions used in the CRA-2009 were unchanged from those
3 used in the CRA-2004 PABC, and remain unchanged in the CRA-2014. The purpose of this
4 model is to reasonably represent the effects of fluid flow in the Salado on long-term performance
5 of the disposal system. The conceptual model is also discussed in the CRA-2004, Chapter 6.0,
6 Section 6.4.5.

7 Fluid flow in the Salado is considered in the conceptual model of long-term disposal system
8 performance for several reasons. First, some liquid could move from the Salado to the repository
9 because of the considerable gradients that can form for liquid flow inward to the repository. This
10 possibility is important because such fluid can affect creep closure, gas generation, actinide
11 solubility, and other processes occurring in the repository. Second, gas generated in the
12 repository is thought to be capable of fracturing the Salado interbeds under certain conditions,
13 creating increased permeability channels that could be pathways for lateral transport. The lateral
14 transport pathway in intact Salado is also modeled, but it is considered unlikely to result in any
15 significant radionuclide transport to the accessible environment boundary.

16 The fundamental principle in the conceptual model for fluid flow in the Salado is that it is a
17 porous medium within which gas and brine can both be present and mobile (two-phase flow),
18 governed by conservation of energy and mass and by Darcy's Law for their fluxes (see Appendix
19 PA-2014, Sections PA-4.2). Consistent with typical concepts of two-phase flow, each phase can
20 affect the other by impeding flow because of partial saturation (relative permeability effects) and
21 by affecting pressure by capillary forces (capillary pressure effects). It was originally assumed
22 that no waste-generated gas is present before repository closure. However, during the EPA
23 completeness review of the CRA-2004, the representation of the gas-generation rate was
24 changed for the CRA-2004 PABC (Cotsworth 2005). The repository was precharged after
25 closure to represent the short-term, but initially faster, microbial gas-generation rate (see Leigh et
26 al. 2005, Section 2.3). Future states are modeled as producing gas by corrosion and microbial
27 activities. Should high pressure develop over the regulatory period, it is allowed to access MBs
28 in the Salado.

29 Some variability in composition exists between different horizons of the Salado. The largest
30 differences occur between the anhydrite-rich layers called interbeds and those dominated by
31 halite. Within horizons dominated by halite, composition varies from nearly pure halite to halite
32 plus several percent other minerals, in some instances including clay (see the CCA, Chapter 2.0,
33 Section 2.1.3.4). The Salado is modeled as impure halite except for those interbeds that intersect
34 the DRZ near the repository. This conceptual model and an alternative model that explicitly
35 represented all stratigraphically distinct layers of the Salado near the repository (Christian-Frear
36 and Webb 1996) produced similar results.

37 From other modeling and theoretical considerations, flow between the Salado and the repository
38 is expected to occur primarily through interbeds that intersect the DRZ. Because of the large
39 surface areas between the interbeds and surrounding halite, the interbeds serve as conduits for
40 the flow of brine in two directions: from halite to interbeds to the repository or, for brine
41 flowing out of the repository, from the repository into interbeds and then into halite. Because the
42 repository is modeled as a relatively porous and permeable region, brine is considered most

1 likely (but not constrained) to leave the repository through MB 139 below the repository because
2 of the effect of gravity. If repository pressures become sufficiently high, gas is modeled to exit
3 the repository via the MBs.

4 The effect of gravity may also be important in the Salado because of the slight and variable
5 natural stratigraphic dip. For long-term performance modeling, the dip in the Salado within the
6 domain is taken to be constant and 1 degree from north to south.

7 Fluid flow in the Salado is conceptualized as occurring either convergently into the repository or
8 divergently from it, as discussed in detail in the CRA-2004, Chapter 6.0, Section 6.4.2.1.
9 Because the repository is not conceptualized as homogeneous, implementing a geometry for the
10 conceptual model of convergent or divergent flow in the Salado is somewhat complicated and is
11 discussed in the CRA-2004, Chapter 6.0, Section 6.4.2.1.

12 The conceptual model for Salado fluid flow has primary interactions with three other conceptual
13 models. The interbed fracture conceptual model allows porosity and permeability of the
14 interbeds to increase as a function of pressure. The repository fluid flow model is directly
15 coupled to the Salado fluid flow model by the governing equations of flow in BRAGFLO (in the
16 governing equations of the mathematical model, they cannot be distinguished), and it differs only
17 in the region modeled and the parameters assigned to materials. The Salado model for actinide
18 transport is directly coupled to the conceptual model for flow in the Salado through the process
19 of advection. Additional information on the treatment of the Salado in PA is found in Appendix
20 PA-2014, Section PA-4.2.

21 **MASS-12.1 High Threshold Pressure for Halite-Rich Salado Rock Units**

22 An important parameter used to describe the effects of two-phase flow is threshold pressure,
23 which helps to determine the ease with which gas can enter a liquid-saturated rock unit. For a
24 brine-saturated rock, the threshold pressure is defined as “equal to the capillary pressure at which
25 the relative permeability to the gas phase begins to rise from its zero value, corresponding to the
26 incipient development of interconnected gas flow paths through the pore network” (Davies 1991,
27 p. 9).

28 The threshold pressure, as well as other parameters used to describe two-phase characteristics,
29 has not been measured for halite-rich rocks of the Salado. The Salado, however, is thought to be
30 similar in pore structure to rocks for which threshold pressures have been measured (Davies
31 1991). Based on this observation, Davies (Davies 1991) postulated that the threshold pressure of
32 the halite-rich rocks in the Salado could be estimated if an empirical correlation exists between
33 rocks postulated to have similar pore structure.

34 Davies developed a correlation between threshold pressure and intrinsic permeability applicable
35 to the Salado halites. A similar correlation was developed for Salado anhydrites; subsequent
36 testing confirmed that the correlation predicted threshold pressures accurately. The correlation
37 developed by Davies predicts threshold pressures in intact Salado halites on the order of 20 MPa
38 or greater (Davies 1991). This threshold pressure predicted by correlation is much higher than
39 that expected to persist in the repository, so that for all practical and predictive purposes, no gas
40 will flow into intact Salado halites (see the CRA-2004, Chapter 6.0, Section 6.4.5.1).

1 Because threshold pressure helps control the flow of gas, and because the greatest volume of
2 rock in the Salado is rich in halite, a high threshold pressure effectively limits the volume of gas
3 that can be accommodated in the pore spaces of the intact host formation. Thus, high threshold
4 pressure is considered conservative, because if gas could flow into the pore spaces of intact
5 Salado halite, repository pressures could be reduced dramatically.

6 **MASS-12.2 Historical Context of the Salado Conceptual Model**

7 See the CCA, Appendix MASS, Section MASS-13.2 for the historical information relating to the
8 CCA Salado conceptual model. The Salado conceptual model is unchanged for the CRA-2014
9 PA.

10 **MASS-12.3 The Fracture Model**

11 The fracture model assumptions used in the CRA-2009 were unchanged from those used in the
12 CRA-2004 PABC, and remain unchanged in the CRA-2014. The purpose of this model is to
13 alter the porosity and permeability of the anhydrite interbeds and the DRZ if their pressure
14 approaches lithostatic, simulating some of the hydraulic effects of fractures with the intent that
15 unrealistically high pressures (in excess of lithostatic) do not occur in the repository or disposal
16 system. The conceptual model is also discussed in the CRA-2004, Chapter 6.0, Section 6.4.5.2.

17 In the 1992 preliminary PA, repository pressures were shown to greatly exceed lithostatic
18 pressure if a large quantity of gas was generated. Pressures within the waste repository and
19 surrounding regions were predicted to be roughly 20 to 25 MPa. It is expected that fracturing
20 within the anhydrite MBs would occur at pressures slightly above lithostatic pressure, and this
21 fracturing is implemented through a pressure-dependent compressibility.

22 Two parametric behaviors must be quantified in the conceptual model. First, the change of
23 porosity with pressure in the anhydrite MBs must be specified. This is done with a relatively
24 simple equation, described in Appendix PA-2014, Section PA-4.2.4, that relates porosity change
25 to pressure change using an assumption that the fracturing can be thought of as increasing the
26 compressibility of interbeds. Parameters in the model are treated as fitting parameters and have
27 little relation to physical behavior except that they affect the porosity change. The second
28 parametric behavior is the change of permeability with pressure, which is incorporated by a
29 functional dependence on the porosity change. It is assumed that a power function is appropriate
30 for relating the magnitude of permeability increase to the magnitude of porosity increase. The
31 parameter in this power function, an exponent, is also treated as a fitting parameter and can be
32 set so that the behavior of permeability increase with porosity increase fits the desired behavior.

33 The 1-degree dip modeled in BRAGFLO may affect fracture propagation direction; however,
34 within the accuracy of the finite difference grid, a fracture will develop radially outward. This
35 would not account for fracture fingering or a preferential fracturing direction; however, no
36 existing evidence supports heterogeneous anhydrite properties that would contribute to
37 preferential fracture propagation. This evidence is discussed in the CCA, Appendix MASS,
38 Attachment 13-2.

1 The maximum enhanced fracture porosity controls the storativity within the fracture. The extent
2 of the migration of the gas front into the MB is sensitive to this storativity. The additional
3 storativity caused by porosity enhancement will mitigate gas migration within the MB. The
4 enhancement of permeability by MB fracturing will make the gas more mobile and will
5 contribute to longer gas-migration distances. Thus the effects of porosity enhancement at least
6 partially counteract the effects of permeability enhancement in affecting the gas-migration
7 distances.

8 Because intact anhydrite is partially fractured, the pressure at which porosity or permeability
9 changes are initiated is close to the initial pressure within the anhydrite. The fracture treatment
10 within the MBs will not contribute to early brine drainage from the MB because the pressures at
11 these times are below the fracture initiation pressure.

12 The input data to the interbed fracture model (see Kicker and Herrick 2013) were chosen
13 deterministically to produce the appropriate pressure and porosity response as predicted by a
14 linear elastic fracture mechanics model, as discussed in Mendenhall and Gerstle (Mendenhall
15 and Gerstle 1993).

16 **MASS-12.4 Flow in the DRZ**

17 The CRA-2009 modeling assumptions for flow in the salt DRZ were unchanged from those used
18 in the CRA-2004 PABC, and remain unchanged in the CRA-2014. The conceptual model for
19 the DRZ around the waste disposal, operations, and experimental regions has been chosen to
20 provide a reasonably conservative estimate of fluid flow between the repository and the intact
21 halite and anhydrite MBs. The conceptual model is also discussed in the CRA-2004, Chapter
22 6.0, Section 6.4.5.3.

23 The conceptual model implemented in the CCA PA used values for the permeability and porosity
24 of the salt DRZ that did not vary with time. A screening analysis examined an alternative
25 conceptual model for the DRZ in which permeability and porosity changed dynamically in
26 response to changes in pressure (Vaughn, Lord, and MacKinnon 1995e). This analysis
27 implemented a fracturing model in BRAGFLO for the salt DRZ. This fracturing model is used
28 in the existing anhydrite interbed model. In this model, formation permeability and porosity
29 depend on brine pressure, as described by Freeze, Larsen, and Davies (Freeze, Larsen, and
30 Davies 1995, pp. 2-16 through 2-19) and Appendix PA-2014, Section PA-4.2.4. This model
31 permits the representation of two important formation-alteration effects. First, pressure buildup
32 caused by gas generation and creep closure within the waste will slightly increase porosity within
33 the DRZ and offer additional fluid storage with lower pressures. Second, the accompanying
34 increase in formation permeability will enhance fluid flow away from the DRZ. An increase in
35 porosity tends to reduce outflow into the far field. As a result, parameter values for this analysis
36 were selected so that the DRZ alteration model greatly increases permeability while only
37 modestly increasing porosity.

38 Two basic scenarios were considered in the screening analysis by Vaughn, Lord, and
39 MacKinnon (Vaughn, Lord, and MacKinnon 1995e): undisturbed repository performance and
40 disturbed repository performance. Both scenarios included a 1-degree formation dip downward
41 to the south. Intrusion event E1 is considered in the disturbed scenario and consists of a borehole

1 that penetrates the repository and pressurized brine in the underlying Castile. Two variations of
2 intrusion event E1 were examined: E1 updip and E1 downdip. In the E1 updip event, the
3 intruded panel region was located on the north end of the waste disposal region, whereas in the
4 E1 downdip event, the intruded panel region was located on the south end of the disposal region.
5 These two different geometries permitted evaluation of the possibility of increased brine flow
6 into the panel region and the potential for subsequent impacts on contaminant migration. To
7 incorporate the effects of uncertainty in each case (E1 updip, E1 downdip, and undisturbed), a
8 Latin hypercube sample (LHS) size of 20 was used, for a total of 60 simulations. To assess the
9 sensitivity of system performance on formation alteration of the DRZ, conditional CCDFs of
10 normalized contaminated brine releases were constructed and compared with the corresponding
11 baseline model conditional CCDFs that were computed with constant DRZ permeability and
12 porosity values. Based on comparisons between conditional CCDFs, computed releases to the
13 accessible environment were determined to be essentially equivalent between the two treatments.
14 Since the two configurations were determined to have essentially equivalent impacts on releases,
15 the intrusion borehole was assumed to intrude in the down-dip or south side of the repository
16 where it is assumed brine would more readily accumulate (see Figure MASS-3).

17 Preliminary PAs considered alternative conceptual models that allowed for some lateral extent of
18 the DRZ into the halite surrounding the waste disposal region and for the development of a
19 transition zone between anhydrites A and B and MB 138 (WIPP Performance Assessment 1993,
20 Volume 4, Figure 4.1-2 and Figure 5.1-2; Davies, Webb, and Gorham 1992; Gorham et al.
21 1992). The transition zone was envisioned as a region that had experienced some hydraulic
22 depressurization and perhaps some elastic stress relief because of the excavation, but probably no
23 irreversible rock damage and no large permeability changes. Modeling results indicated that
24 including the lateral extent of the DRZ had no significant effect on fluid flow. Communication
25 vertically to MB 138 was thought to be a potentially important process, however, and the model
26 adopted for PA assumes that the DRZ extends upward to MB 138 and permeability is sampled
27 over the same range used in the CRA PAVT. This representation continues to be used in the
28 CRA-2014 PA.

29 **MASS-12.5 Actinide Transport in the Salado**

30 The actinide transport modeling assumptions used in the CRA-2009 were unchanged from those
31 used in the CRA-2004 PABC, and remain unchanged in the CRA-2014. The purpose of this
32 model, implemented in the code NUTS, is to represent the transport of actinides in the Salado.
33 This model is also discussed in the CRA-2004, Chapter 6.0, Section 6.4.5.4, and Appendix PA-
34 2014, Section PA-4.3.4.

35 Actinide transport in the Salado is conceptualized as occurring only by advection, or movement
36 of material through the bulk flow of a fluid, through the porous medium described in the Salado
37 hydrology conceptual model. Advection is a direct function of fluid flow, which is discussed in
38 the conceptual model for Salado fluid flow. Other processes that might disperse actinides, such
39 as diffusion, hydrodynamic dispersion, and channeling in discrete fractures, are not included in
40 the conceptual model. Since these processes will reduce actinide transport, it is conservative to
41 ignore these processes.

1 To model radionuclide transport in the Salado, NUTS takes as input BRAGFLO's velocity field,
2 pressures, porosities, saturations, and other model parameters (including geometrical grid,
3 residual saturation, material map, brine compressibility, and time step) averaged over a given
4 number of time steps (20 for the CRA-2014 PA calculations). NUTS then models the transport
5 of radionuclides within all the regions for which BRAGFLO computes brine and gas flow. The
6 brine must pass through some part of the repository at some point during the 10,000-year
7 regulatory period if it is to become contaminated. Radioactive constituents of the waste in the
8 repository are assumed to dissolve into the brine while the brine is in the repository; the
9 radionuclides are then transported by advection to other regions outside the repository.
10 Consequently, the results of NUTS are subject to all the uncertainties associated with
11 BRAGFLO's conceptual model and parameterization. Details of the source term, which
12 specifies the types and amounts of radionuclides that are assumed to come into contact with the
13 waste, are discussed in Appendix SOTERM-2014, Section SOTERM-3.0.

14 NUTS neglects molecular dispersion. For materials of interest in the WIPP repository system,
15 molecular diffusion coefficients are, at most, on the order of $4 \times 10^{-10} \text{ m}^2$ per second. Thus, the
16 simplest scaling argument using a time scale of 10,000 years leads to a molecular diffusion (that
17 is, mixing) length scale of approximately 10 m (33 ft), which is negligible compared to the
18 lateral advection length scale of roughly 2,400 m (7,874 ft) (the lateral distance from the
19 repository to the accessible environment).

20 NUTS also neglects mechanical dispersion (see the CRA-2004, Chapter 6.0, Section 6.4.5.4.2).
21 Dispersion is quantified by dispersivities, which are empirical tensor factors proportional to flow
22 velocity (to within geometrical factors related to flow direction). They account for both the
23 downstream and cross-stream spreading of local extreme values in concentration of dissolved
24 constituents. Physically, the spreading is caused by the fact that both the particle paths and
25 velocity histories of once-neighboring particles can be vastly different because of material
26 heterogeneities characterized by permeability variations. These variations arise from the
27 irregular cross-sectional areas and tortuous inhomogeneous, anisotropic connectivity between
28 pores. Because of its velocity dependence, the transverse component of mechanical dispersivity
29 tends to transport dissolved constituents from regions of relatively rapid flow (where mechanical
30 dispersion has a larger effect) to regions of slower flow (where mechanical dispersion has a
31 smaller effect). In the downstream direction, dispersivity merely spreads constituents in the flow
32 direction. Conceptually, ignoring lateral spreading assures that dissolved constituents will
33 remain in the rapid part of the flow field, which assures their transport toward the boundary.
34 Similarly, ignoring longitudinal dispersivity ignores the elongation of a feature in the flow
35 direction, which would delay the arrival of radionuclide constituents at the accessible
36 environment. However, because the EPA release limits are time-integrated measures, the exact
37 time of arrival is unimportant for constituents that arrive at the accessible environment, so long
38 as arrival occurs within the assessment period (10,000 years).

39 NUTS conservatively disregards sorptive and other retarding effects throughout the entire flow
40 region even though retardation must occur at some level within the repository, the MBs, and the
41 anhydrite interbeds, and especially in zones with clay layers or clay as accessory minerals.
42 Advection is, therefore, the only transport mechanism considered in NUTS. Because the Darcy
43 flows are given by BRAGFLO to NUTS as input, the maximum solubility limits for combined

1 dissolved and colloidal components are the most important NUTS parameters. These
2 components are described in Appendix SOTERM-2014, Section SOTERM-5.0.

3 **MASS-13.0 Geologic Units above the Salado**

4 The modeling assumptions of the geologic units above the Salado used in the CRA-2009 were
5 unchanged from those used in the CRA-2004 PABC, and remain unchanged in the CRA-2014.
6 The model for geologic units above the Salado was developed to provide a reasonable and
7 realistic basis for simulations of fluid flow within the disposal system and detailed simulations of
8 groundwater flow and radionuclide transport in the Culebra. The conceptual model for these
9 units is also discussed in the CRA-2004, Chapter 6.0, Section 6.4.6.

10 The conceptual model used in PA for the geologic units above the Salado is based on the overall
11 concept of a groundwater basin, as introduced in the CRA-2004, Chapter 2.0, Section 2.2.1.1,
12 and in the CCA, Appendix MASS, Section MASS-14.2. The computer code SECOFL3D was
13 originally used to evaluate the effect on regional-scale fluid flow by recharge and rock properties
14 in the groundwater basin above the Salado (see the CCA, Appendix MASS, Attachment 17-2).
15 However, simpler models for this region are implemented in codes used in PA. For example, in
16 the BRAGFLO model, layer thicknesses, important material properties including porosity and
17 permeability, and hydrologic properties such as pressure and initial fluid saturation are specified,
18 but the model geometry and boundary conditions are not suited to groundwater basin modeling
19 (nor is the BRAGFLO model used to make inferences about groundwater flow in the units above
20 the Salado). In PA, the Culebra is the only subsurface pathway modeled for radionuclide
21 transport above the Salado, although the groundwater basin conceptual model includes other
22 flow interactions. The Culebra model implemented in PA includes spatial variability in
23 hydraulic conductivity and uncertainty and variability in physical and chemical transport
24 processes. Thus, the geometries and properties of units in the different models applied to the
25 units above the Salado by the DOE are chosen to be consistent with the purpose of the model.

26 The MODFLOW-2000 and SECOTP2D codes are used directly in PA to model fluid flow and
27 transport in the Culebra. The assumptions made in these codes are discussed in the CRA-2004,
28 Chapter 6.0, Section 6.4.6.2, and Appendix PA-2004, Attachment MASS, Section MASS-15.0.

29 With respect to the units above the Salado, the BRAGFLO model is used only for determination
30 of fluid fluxes between the shaft or intrusion borehole and hydrostratigraphic units. For this
31 purpose, it does not need to resolve regional or local flow characteristics.

32 The basic stratigraphy and hydrology of the units above the Salado are described in the CRA-
33 2004, Chapter 2.0, Section 2.1.3.5, Section 2.1.3.6, Section 2.1.3.7, Section 2.1.3.8, Section
34 2.1.3.9, Section 2.1.3.10 and Section 2.2.1.4. Additional supporting information is contained in
35 the CCA, Appendices GCR, HYDRO, and SUM. Details of the conceptual model for each unit
36 are described in the CRA-2004, Chapter 6.0, Section 6.4.6.1, Section 6.4.6.2, Section 6.4.6.3,
37 Section 6.4.6.4, Section 6.4.6.5, Section 6.4.6.6, and Section 6.4.6.7, and additional information
38 on units above the Salado is found in Appendix HYDRO-2014.

39 The representation of units above the Salado in the CRA-2009 was unchanged from that used in
40 the CRA-2004 PABC, and remains unchanged in the CRA-2014 PA.

1 **MASS-13.1 Historical Context of the Units above the Salado Model**

2 See the CCA, Appendix MASS, Section MASS-14.1 for historical information relating to the
3 conceptual models for units above the Salado for the CCA. The conceptual models for the units
4 above the Salado are unchanged for CRA-2014 PA.

5 **MASS-13.2 Groundwater-Basin Conceptual Model**

6 The groundwater-basin conceptual model and associated modeling assumptions used in the
7 CRA-2009 were unchanged from those used in the CRA-2004 PABC, and remain unchanged in
8 the CRA-2014. For a discussion on the groundwater-basin conceptual model, see the CCA,
9 Appendix MASS, Section MASS-14.2.

10 **MASS-14.0 Flow through the Culebra**

11 The Culebra flow modeling assumptions used in the CRA-2009 were unchanged from those used
12 in the CRA-2004 PABC, and remain unchanged in the CRA-2014. The conceptual model for
13 groundwater flow in the Culebra (1) provides a reasonable and realistic basis for simulating
14 radionuclide transport in the Culebra, and (2) allows evaluation of the extent to which
15 uncertainty about groundwater flow in the Culebra may contribute to uncertainty in the estimate
16 of cumulative radionuclide releases from the disposal system. See the CRA-2004, Chapter 6.0,
17 Section 6.4.6.2 for additional references to other relevant discussions on this conceptual model.

18 The conceptual model used in PA for groundwater flow in the Culebra treats the Culebra as a
19 confined two-dimensional aquifer with constant thickness and spatially varying transmissivity
20 (see the CCA, Appendix MASS, Attachment 15-7). Flow is modeled as single-phase (liquid)
21 Darcy flow in a porous medium.

22 Basic stratigraphy and hydrology of the units above the Salado are described in the CRA-2004,
23 Chapter 2.0, Section 2.1 and Section 2.2. Additional supporting information is contained in the
24 CCA, Appendices GCR, HYDRO, and SUM.

25 The conceptual model for flow in the Culebra is discussed in the CRA-2004, Chapter 6.0,
26 Section 6.4.6.2. Details of the calibration of the T fields, based on available field data, are given
27 in Appendix TFIELD-2014. Initial and boundary conditions used in the model are given in the
28 CRA-2004, Chapter 6.0, Section 6.4.10.2. A discussion of the adequacy of the two-dimensional
29 assumption for PA calculations is included in the CCA, Appendix MASS, Attachment 15-7.

30 The principal parameter used in PA to characterize flow in the Culebra is an index parameter (the
31 transmissivity index) used to select a single T field for each LHS element from a set of calibrated
32 fields (see Kicker and Herrick 2013, Table 1), each of which is consistent with available data.

33 **MASS-14.1 Historical Context of the Culebra Model**

34 See Appendix PA-2004, Attachment MASS, Section MASS-15.1 for historical information
35 relating to the Culebra conceptual model. The conceptual model for this unit is unchanged for
36 the CRA-2014.

1 **MASS-14.2 Dissolved Actinide Transport and Retardation in the Culebra**

2 The purpose of this model is to represent the effects of advective transport and physical and
3 chemical retardation on the movement of actinides in the Culebra. This conceptual model is also
4 discussed in the CRA-2004, Chapter 6.0, Section 6.4.6.2.1. The same model is used in the CRA-
5 2004 PABC and the CRA-2014 PA. For a historical presentation of this model, see Appendix
6 PA-2004, Attachment MASS, Section MASS-15.2.

7 **MASS-14.3 Colloidal Actinide Transport and Retardation in the Culebra**

8 The purpose of this model is to represent the effects of colloidal actinide transport in the Culebra.
9 This model is also discussed in the CRA-2004, Chapter 6.0, Section 6.4.6.2.2 and Appendix PA-
10 2004, Attachment MASS, Attachments 15-2, 15-8, and 15-9. No changes have been made to this
11 model since the CRA-2004. Additional information and historical information on colloidal
12 actinide transport and retardation in the Culebra can be found in Appendix PA-2004, Attachment
13 MASS, Section MASS-15.3.

14 **MASS-14.4 Subsidence Caused by Potash Mining in the Culebra**

15 The mining-related modeling assumptions used in the CRA-2009 were unchanged from those
16 used in the CRA-2004 PABC, and remain unchanged in the CRA-2014. This model incorporates
17 the effects of potash mining in the McNutt Potash Zone on disposal system performance (see
18 Appendix SCR-2014, FEP H13, FEP H37, and FEP H38). Provisions in Part 194 provide a
19 conceptual model and elements of a mathematical model for these effects. The DOE has
20 implemented the EPA conceptual model (40 CFR § 194.32(b), U.S. EPA 1996) to be consistent
21 with EPA criteria and guidance; this model is described in the CRA-2004, Chapter 6.0, Section
22 6.4.6.2.3. Additional information on the implementation of the mining subsidence model is
23 available in Appendix TFIELD-2014; the CCA, Appendix MASS, Attachments 15-4 and 15-7;
24 and Wallace (Wallace 1996).

25 The principal parameter in this model is the range assigned to a factor by which hydraulic
26 conductivity in the Culebra is increased (see the CCA, Appendix MASS, Attachment 15-4). As
27 allowed in supplementary information to Part 194, it is the only parameter changed to account
28 for the effects of mining.

29 Mining has been included in scenario development for the WIPP since the earliest work on this
30 topic (U.S. DOE 1980 [pp. 9-145 through 9-148]; Hunter 1989; Marietta et al. 1989; Guzowski
31 1990; Tierney 1991; WIPP Performance Assessment 1991). These early scenario developments
32 considered both solution and room-and-pillar mining. The focus was generally on effects of
33 mining outside the disposal system. In the CCA FEPs screening, solution mining was screened
34 out during scenario development (see Appendix SCR-2014, FEP H58 and FEP H59). The two
35 primary effects of mining considered were (1) changes in the hydraulic conductivity of the
36 Culebra or other units, and (2) changes in recharge as a result of surface subsidence. These
37 mining effects were not formally incorporated into quantitative assessment of repository
38 performance in preliminary PAs.

1 The inclusion of mining in PA satisfies the requirements of section 194.32(b) to consider the
2 effects of this activity on the disposal system.

3 **MASS-15.0 Intrusion Borehole**

4 The intrusion borehole modeling assumptions used in the CRA-2009 were unchanged from those
5 used in the CRA-2004 PABC, and remain unchanged in the CRA-2014. The inclusion of
6 intrusion boreholes in PA adds to the number of release pathways for radionuclides from the
7 disposal system. Direct releases to the surface may occur during drilling as particulate material
8 from cuttings, cavings, and spallings are carried to the surface. Also, dissolved actinides may be
9 carried to the surface in brine during drilling. Once abandoned, the borehole presents a possible
10 long-term pathway for fluid flow, such as might occur between a hypothetical Castile brine
11 reservoir, the repository, and overlying units. This topic is also addressed in the CRA-2004,
12 Chapter 6.0, Section 6.4.7, and Appendix SCR-2014 (FEP H1 and FEP H21).

13 **MASS-15.1 Cuttings, Cavings, and Spallings Releases during Drilling**

14 The cuttings, cavings, and spallings models estimate the quantity of actinides released as solids
15 directly to the surface during drilling through the repository. The releases are caused by three
16 mechanisms: the drill bit boring through the waste (cuttings); the drilling fluid eroding the walls
17 of the borehole (cavings); and high repository gas pressure causing solid material failure and
18 entrainment into the drilling fluid in the wellbore (spallings). See the CRA-2004, Chapter 6.0,
19 Section 6.4.7.1, and references to other appendices cited in that section for additional
20 information. Stochastic uncertainty in parameters relevant to these release mechanisms is
21 addressed in the CRA-2004, Chapter 6.0, Section 6.4.12. The conceptual model for cuttings,
22 cavings, and spallings is discussed in three parts because of the different processes that produce
23 the three types of releases.

24 Cuttings are materials removed to the surface through drilling mud by the direct mechanical
25 action of the drill bit. The volume of waste removed to the surface is a function of the repository
26 height and the drill bit area. The principal parameter in the cuttings model is the diameter of the
27 drill bit (see Attachment PAR-2014).

28 Cavings are materials introduced into the drilling mud by the erosive action of circulating
29 drilling fluid on the waste in the walls of the borehole annulus. Erosion is driven solely by the
30 shearing action of the drilling fluid (or mud) as it moves up the borehole annulus. Shearing may
31 be caused by either laminar or turbulent flow. The principal parameters in the cavings model are
32 the properties of the drilling mud, drilling rates, the drill string angular velocity, and the shear
33 resistance of the waste (see MASS-15.1.2). (See Kicker and Herrick 2013 for details on the
34 sampled parameters used in the cavings model, the drill string angular velocity, and the effective
35 shear resistance to erosion.)

36 Spallings are solids introduced into the wellbore by the fluid pressure difference between the
37 repository and the bottom of the wellbore. If the repository pressure is sufficiently high (more
38 than about 12 MPa) relative to the well bottom hole pressure (about 8 MPa), the stress state in
39 the repository may cause repository solids to fail in the vicinity of the wellbore. In turn, these
40 solids may become entrained in the gas flowing toward the well, ultimately to be carried up to

1 the land surface and constituting a release. The principal parameters in the spallings model are
2 the gas pressure in the repository when it is penetrated and properties of the waste such as
3 permeability, tensile strength, and particle diameter. Because the release associated with spalling
4 is sensitive to gas pressure in the repository, it is strongly coupled to the BRAGFLO-calculated
5 conditions in the repository at the time of penetration.

6 **MASS-15.1.1 Historical Context of Cuttings, Cavings, and Spallings Models**

7 Cuttings and cavings releases are straightforward. The analytical equations governing erosion
8 (cavings) based on laminar and turbulent flow (Appendix PA-2014, Section PA-4.5) have been
9 implemented in the code CUTTINGS_S. Using selected input based on assumed physical
10 properties of the waste and other drilling parameters, this code calculates the final caved
11 diameter of the borehole that intersects the waste.

12 The various approaches used for spallings up to the CCA PA are documented in the CCA,
13 Appendix MASS, Section MASS-16.1.1. Since the CCA PA, the spallings model has been
14 extensively revised and has changed fundamentally from an end-state erosional model to a
15 mechanically based, coupled material failure and transport model (WIPP Performance
16 Assessment 2003a). This model is implemented in the code DRSPALL. A discussion tracing
17 the historical steps from the CCA erosional model to the current DRSPALL model can be found
18 in Appendix PA-2004, Attachment MASS, Section MASS-16.1.1.

19 **MASS-15.1.2 Waste Mechanistic Properties**

20 Waste mechanical properties used in the CRA-2014 are updated from those used in the CRA-
21 2009. For intrusion events considered in WIPP PA, drilling mud flowing up the borehole will
22 apply a hydrodynamic shear stress on the borehole wall. Erosion of the wall material can occur
23 if this stress is high enough, resulting in a release of radionuclides being carried up the borehole
24 with the drilling mud. In this intrusion event, the drill bit would penetrate repository waste, and
25 the drilling mud would flow up the borehole in a predominately vertical direction. In order to
26 experimentally simulate these conditions, a flume was designed and constructed. In the flume
27 experimental apparatus, eroding fluid enters a vertical channel from the bottom and flows past a
28 specimen of surrogate WIPP waste. Experiments were conducted to determine the erosive
29 impact on surrogate waste materials that were developed to represent WIPP waste that is 50%,
30 75%, and 100% degraded by weight. A description of the vertical flume, the experiments
31 conducted in it, and conclusions to be drawn from those experiments are discussed in Herrick et
32 al. (Herrick et al. 2012).

33 The WIPP PA uses the parameter BOREHOLE:TAUFAIL to represent the hydrodynamic shear
34 strength of the waste in the numerical code CUTTINGS_S (see Appendix PA-2014, Section
35 PA-4.5). It is officially called the “effective shear strength for erosion,” but it is more commonly
36 known as the “waste shear strength.” Based on experimental results that realistically simulate
37 the effect of a drilling intrusion on an accepted surrogate waste material, as well as analyses of
38 existing data (see Herrick 2013), parameter BOREHOLE:TAUFAIL is updated in the CRA-2014
39 PA. Values specified for parameter BOREHOLE:TAUFAIL in the CRA-2014 PA are obtained
40 by sampling a uniform distribution with a range of 2.22 Pa to 77 Pa.

1 **MASS-15.1.3 Mechanistic Model for Spall**

2 The CRA-2014 PA uses the same spillings model that was used in the CRA-2009 PABC and the
3 CRA-2004 PABC. No changes were made to the model or implementation of the results in PA.

4 In the CRA-2004 PA, a new approach to modeling the WIPP spillings process was developed to
5 address peer review concerns during the original certification process (see the CCA, Chapter 9.0,
6 Section 9.3.1.2 and Appendix PEER-2004, Section PEER-2004 3.0). Instead of focusing on the
7 end state after penetration, as was done in the original CCA erosional model, the new model
8 sought to capture the system behavior from just before penetration through to the end state. In
9 doing so, many more phenomena were included in the model. Considered in this new conceptual
10 model was unsteady, convergent gas flow from the repository toward the wellbore that caused
11 mechanical stress and potential failure of solids near the face of the wellbore. Pressure in the
12 cavity at the point of penetration was balanced by the mud column in the wellbore and the
13 repository pressure.

14 The new spall model, DRSPALL (WIPP Performance Assessment 2003a), is based on a
15 predecessor code called GASOUT (Hansen et al. 1997, Appendix C). DRSPALL builds upon
16 GASOUT by:

- 17 1. Adding a wellbore flow model that transports mud, repository gas, and waste solids from
18 repository level to the land surface
- 19 2. Adding a fluidized bed model that evaluates the potential for failed particulate waste to
20 fluidize and become entrained in the wellbore flow

21 The wellbore flow model in DRSPALL utilizes one-dimensional geometry with a compressible,
22 viscous, isothermal, homogeneous mixture of mud, gas, and solids. Standard mass and
23 momentum balance, friction loss, and slurry viscosity equations are used. Wellbore flow model
24 results were successfully verified against those from an independent commercial code for several
25 test problems (WIPP Performance Assessment 2003b).

26 DRSPALL applies the fluidized bed theory to determine the mobilization of failed material to the
27 flow stream in the wellbore. If the escaping gas velocity exceeds the minimum fluidization
28 velocity, failed material is fluidized and entrained for transport at the land surface. If gas
29 velocity is too low to fluidize the bedded material, the cavity size is allowed to stabilize. The
30 spall volumes predicted by DRSPALL are based on the following conservative assumptions for
31 material properties and for the flow geometry within the repository:

- 32 • The particle size distribution for spillings is based on a detailed analysis (Wang 1997) of
33 data from an expert elicitation (Carlsbad Area Office Technical Assistance Contractor
34 [CTAC] 1997). This analysis considered several limiting cases in developing a conservative
35 distribution for mean particle size ranging from 1 millimeter to 10 cm (Hansen, Pfeifle, and
36 Lord 2003).
- 37 • The shape factor for fluidization of particles has a potential range from 0 to 1.0. Smaller
38 values of the shape factor denote particles that are less spherical, and therefore more easily

1 fluidized and transported in the flow. The shape factor is conservatively set to a value of 0.1
2 (Lord 2003).

- 3 • The tensile strength of the waste assigned for the spalling process is uncertain, ranging from
4 0.12 MPa to 0.17 MPa (Hansen, Pfeifle, and Lord 2003). Tensile strength data were
5 measured in laboratory experiments on surrogate materials chosen to conservatively
6 represent highly degraded residuals from typical wastes. The given range is felt to represent
7 extreme, low-end tensile strengths because it does not account for several strengthening
8 mechanisms, such as MgO hydration and halite precipitation/cementation (Hansen et al.
9 1997).
- 10 • DRSPALL uses a hemispherical geometry (one-dimensional spherical symmetry) for the
11 flow field and cavity in the waste. This conceptual model is appropriate when the drill bit
12 first penetrates the repository. But, as the drill bit passes completely through the compacted
13 waste, the flow field transitions toward a cylindrically symmetric geometry. This transition
14 is important because the largest spall release volumes are predicted to occur at late times,
15 well after the drill bit has penetrated through the waste, and because the spall volumes
16 predicted for a cylindrical geometry are less than for the hemispherical geometry (Lord,
17 Rudeen, and Hansen 2003).

18 In summary, the conservative assumptions for waste properties, the waste flow geometry, and the
19 driller's actions provide very conservative spalling release volumes (see also Appendix PA-2014,
20 Section PA-4.6 for a description of the spallings model, and Appendix PEER-2004, Section
21 PEER-2004 3.0 for the results of the spallings model peer review). As stated previously, the
22 DRSPALL calculations from the CRA-2004 PABC were also used in the CRA-2014 PA (see
23 Appendix PA-2014, Section PA-6.7.4 and Section PA-8.5.2).

24 **MASS-15.1.4 Calculation of Cuttings, Cavings, and Spall Releases**

25 The modeling assumptions relating to the calculations of cuttings, cavings and spallings releases
26 have not changed since the CRA-2004. As detailed in Appendix PA-2014, Section PA-6.7.5,
27 cuttings and cavings releases for intrusions into CH-TRU waste are computed by multiplying the
28 volume released (calculated by the code CUTTINGS_S) by the radioactivity in three
29 independently selected waste streams, consistent with the conceptual assumption that waste
30 streams are randomly emplaced in waste stacks that are three drums high. The effect of this
31 assumption on PA results was examined in a separate PA (Hansen et al. 2003) in which cuttings
32 and cavings releases were computed by assuming that each intrusion encounters only a single
33 waste stream. The differences in repository performance (determined by comparing the mean
34 CCDFs for releases) were determined to be minor. For more details on the analysis, see
35 Appendix PA-2004, Attachment MASS, Section MASS-21.0.

36 Because spallings may release a relatively large volume of material (exceeding 4 m^3), spalling
37 releases for intrusions into CH-TRU waste are computed by multiplying the volume of spalled
38 material with the average concentration of radioactivity in the waste at the time of the intrusion.
39 A separate PA (Hansen et al. 2003) compared spalling releases computed using the average
40 concentration of radioactivity in the waste to spalling releases computed using the radioactivity
41 of a single, randomly selected waste stream. The analysis determined that the assumption had

1 only a minor effect on the mean CCDF for releases. For more details on the analysis, see
2 Appendix PA-2004, Attachment MASS, Section MASS-21.0. During their completeness review
3 of the CRA-2004, the EPA requested additional DRSPALL vectors be used in the CRA-2004
4 PABC. Minor changes were made to the implementation of spillings results that did not change
5 the overall modeling assumptions. These implementation changes are outlined in Leigh et al.
6 (Leigh et al. 2005, Section 7.8).

7 **MASS-15.2 Direct Brine Releases during Drilling**

8 The DBR modeling assumptions used in the CRA-2009 were unchanged from those used in the
9 CRA-2004 PABC, and remain unchanged in the CRA-2014. This model provides a series of
10 calculations to estimate the quantity of brine released directly to the surface during drilling.
11 DBRs may occur when a driller penetrates the WIPP and unknowingly brings contaminated
12 brine to the surface during drilling (these releases are not accounted for in the cuttings, cavings,
13 and spillings calculations, which model only the solids removed during drilling). Appendix PA-
14 2014, Section PA-4.7, describes the DBR model used for the CRA-2014 PA. The CCA,
15 Appendix MASS, Attachment 16-2 describes the DBR model used for the CCA PA. The
16 conceptual model for DBRs is discussed in Appendix PA-2014, Section PA-4.7, and the CRA-
17 2004, Chapter 6.0, Section 6.4.7.1.1.

18 Uncertainty in the BRAGFLO DBR calculations is captured in the 10,000-year BRAGFLO
19 calculations from which the initial and boundary conditions are derived. The model parameters
20 that have the most influence on DBRs are repository pressure and brine saturation at the time of
21 intrusion. Brine saturation is influenced by many factors, including Salado and MB permeability
22 and gas-generation rates (for undisturbed scenario calculations). For E1 and E2 intrusion
23 scenarios, Castile brine-reservoir pressure and volume, and abandoned borehole permeabilities
24 influence conditions for the second and subsequent intrusions. The dip in the repository (hence
25 the location of intrusions), two-phase flow parameters (residual brine and gas saturation), time of
26 intrusion, and duration of flow have lesser impacts on brine releases.

27 The implementation of the DBR model is slightly adjusted in the CRA-2014 PA to incorporate
28 the ROMPCS. The Option D panel closure modeled in the CRA-2009 PABC is 40 m long
29 whereas the ROMPCS modeled in the CRA-2014 PA is 30.48 m (100 ft) long. As a result, grid
30 cell lengths corresponding to panel closures are reduced to 30.48 m in the CRA-2014 PA. In
31 addition, the ROMPCS, which is modeled as run-of-mine salt in the CRA-2014 PA, has no
32 concrete component that is “keyed in” to the surrounding DRZ. As a result, material elements
33 corresponding to equivalent DRZ/concrete in the CRA-2009 PABC are replaced by DRZ in the
34 CRA-2014 PA. Figure MASS-12 shows the DBR grid and material map used in the CRA-2014
35 PA. (Note that the color scheme in Figure MASS-12 is chosen to match the color scheme of the
36 CRA-2014 BRAGFLO grid and material maps shown in Figure MASS-7 to Figure MASS-11.)
37 Figure MASS-8 of Appendix MASS-2009 shows the DBR grid and material map used in the
38 CRA-2009 PA and PABC.

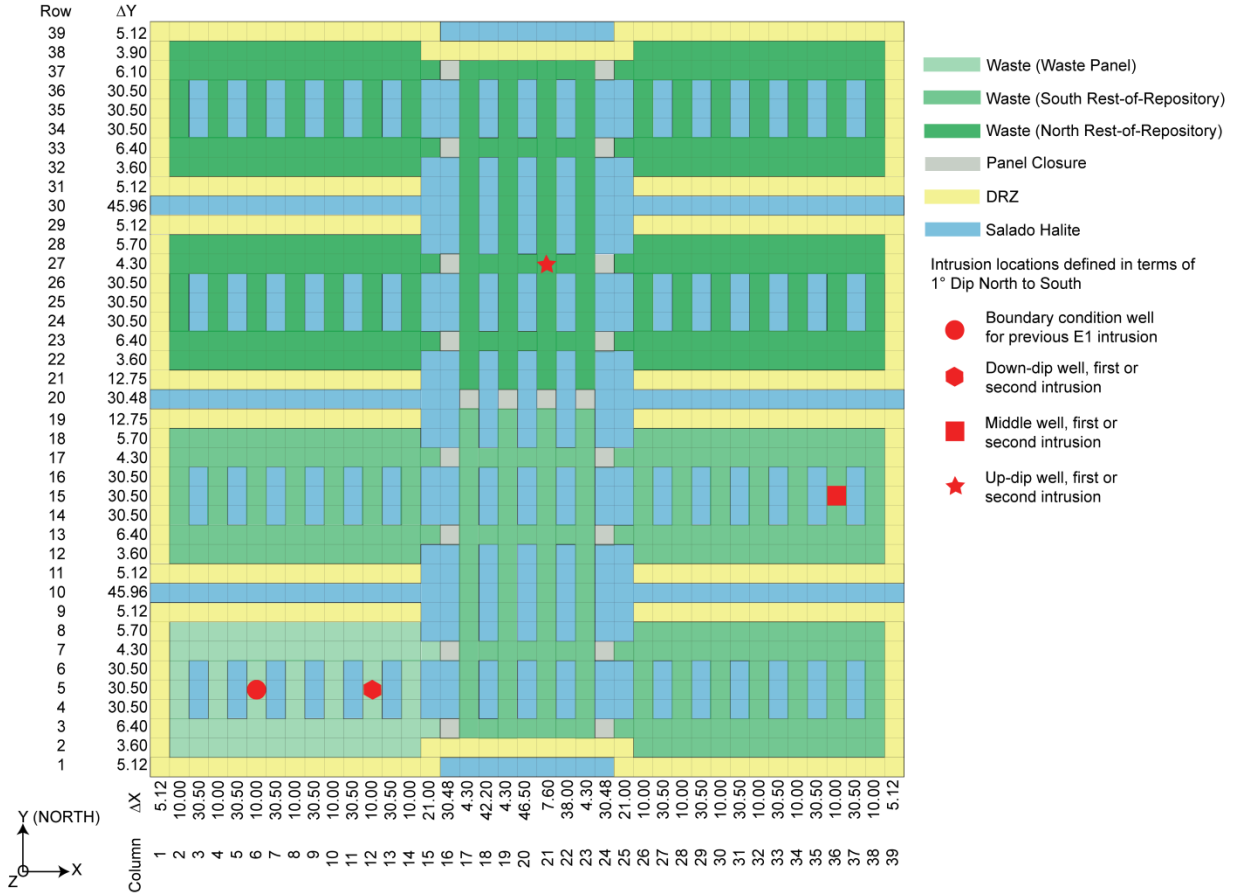


Figure MASS-12. Repository-Scale Horizontal BRAGFLO Mesh Used for DBR Calculations

The CRA-2009 PA used a DBR maximum duration of 4.5 days, based on current drilling practices (see Kirkes 2007 and Appendix PA-2014, Section PA-4.7.8). This value is also used in the CRA-2014 PA.

MASS-15.3 Long-Term Properties of the Abandoned Intrusion Borehole

The long-term treatment and assumptions used to represent boreholes in the CRA-2009 PA were unchanged from those used in the CRA-2004 PABC, and remain unchanged in the CRA-2014. See Appendix PA-2004, Attachment MASS, Section MASS-16.3, and CRA-2014, Section 33, for the borehole modeling assumptions used in the CRA-2014 PA.

1 **MASS-16.0 Climate Change**

2 The purpose of this model is to allow quantitative consideration of the extent to which
3 uncertainty about future climate may contribute to uncertainty in estimates of cumulative
4 radionuclide releases from the disposal system. This model has not changed since the CCA and
5 is used in the CRA-2014 PA. Consideration is limited to conditions that could result from
6 reasonably possible natural climatic changes. The model is not intended to provide a
7 quantitative prediction of future climate, nor is it intended to address uncertainty in system
8 properties other than estimated cumulative radionuclide releases that may be affected by climate
9 change. See Appendix PA-2004, Attachment MASS, Section MASS-17.0, and Section MASS-
10 17.1 for current and historical information on the climate change model. The implementation of
11 this model in PA is also discussed in the CRA-2004, Chapter 6.0, Section 6.4.9 and Appendix
12 PA-2004, Section PA-2.1.4.6. See also the CCA, Appendix CLI for information on expected
13 climate variability over the 10,000-year regulatory time period.

14 **MASS-17.0 Castile Brine Reservoir**

15 The conceptual model for the hypothetical brine reservoir is included in PA to estimate the
16 extent to which uncertainty about the existence of a brine reservoir under the waste disposal
17 region may contribute to uncertainty in the estimate of cumulative radionuclide releases from the
18 disposal system. The conceptual model is not intended to provide a realistic approximation of an
19 actual brine reservoir under the waste disposal region. Data are insufficient to determine
20 whether such a brine reservoir exists.

21 The representation of the Castile brine reservoir in BRAGFLO in the CRA-2014 PA has not
22 changed from the CRA-2004 PA. However, this model is not the same as the one used in the
23 original CCA PA. The following describes the changes to the model since the 1996 CCA PA.

24 The Castile Formation is treated as an impermeable unit in PA and plays no role in the analysis
25 except to separate the Salado from the modeled brine reservoir in the BRAGFLO grid. In
26 human-intrusion scenarios, the hypothetical brine reservoir can be penetrated by an intrusion
27 borehole connecting it to the repository. The amount of brine that can enter the repository from
28 the brine reservoir is important to PA because brine is required for gas-generation reactions and
29 can transport radionuclides in solution, contributing to potential releases.

30 The properties of the hypothetical brine reservoir defined for PA include permeability, porosity,
31 pore volume, initial pressure, and various two-phase flow parameters. Values assigned for these
32 properties were chosen to either be consistent with the available data from and analyses of
33 borehole penetrations of brine reservoirs in the region, or provide a reasonable response in the
34 BRAGFLO model.

35 The treatment of the brine reservoir for the CRA-2004 PA was different than that used in the
36 CCA PA. The major changes to the brine reservoir representation were made by the EPA in the
37 CCA PAVT (U.S. EPA 1998b). For the CCA PAVT, the EPA defined new parameter ranges for
38 bulk compressibility and total pore volume. The range of bulk compressibility was based on a
39 reevaluation of field test data from the WIPP-12 borehole following the CCA (Beauheim 1997).
40 Since the total volume of the grid cells used to represent the brine reservoir in BRAGFLO is

1 fixed, the range of total pore volume was set by defining a range of “effective” porosity (pore
2 volume = grid volume × effective porosity). This range of porosity values is not representative
3 of the actual host rock. It was chosen to produce a reasonable response in the BRAGFLO model
4 by providing a predefined range of total pore volumes based on the field tests at WIPP-12.

5 For the CRA-2004 PA, the DOE implemented this approach by assuming that the productivity
6 ratio (PR) remains constant ($2.0051 \times 10^{-3} \text{ m}^3/\text{Pa}$). The PR is defined as:

$$PR = V \frac{C_r}{\phi},$$

7
8 where V is the grid volume of the brine reservoir ($18,462,514 \text{ m}^3$), C_r is the bulk compressibility
9 (2×10^{-11} to $1 \times 10^{-10} \text{ Pa}^{-1}$), and ϕ is the effective porosity (0.1842 to 0.9208). To maintain a
10 constant pore volume in the brine reservoir, the porosity range used in the CRA-2004 PA is
11 slightly modified from that used in the CCA PAVT because the fixed-grid volume increased
12 slightly in the CRA-2004 BRAGFLO grid from the volume assumed in the CCA BRAGFLO
13 grid. In this approach, bulk compressibility and effective porosity are directly proportional
14 (Stein 2003). See Appendix PA-2014, Section PA-4.2.10 for the details on the implementation
15 in PA.

16 Basic geologic information about the Castile is given in the CRA-2004, Chapter 2.0, Section
17 2.1.3.3. The hydrology of the known brine reservoirs is discussed in the CRA-2004, Chapter 2.0,
18 Section 2.2.1.2.2. The treatment of the hypothetical brine reservoir in PA is discussed in the
19 CRA-2004, Chapter 6.0, Section 6.4.8.

20 **MASS-17.1 Historical Context of the Castile Brine Reservoir Model**

21 See the CCA, Appendix MASS, Attachment 18.1 for historical information on the Castile brine
22 reservoir model.

23 **MASS-18.0 Summary of Clay Seam G Modeling Assumptions**

24 One of the changes to the repository design since the CCA is the raising of the repository horizon
25 in the southern half of the waste panels. Specifically, Panels 3, 4, 5, and 6, have been excavated
26 at an elevation approximately 2.4 m above the level of Panels 1, 2, 7, and the operations and
27 experimental areas. This change in horizon has brought the roof of the raised rooms to the level
28 of the Clay Seam G. The change has improved roof conditions and enhanced operations and
29 mine safety. The DOE submitted a planned change request to the EPA describing the change
30 and argued that it would have minimal impact on long-term repository performance (Triay
31 2000). The EPA responded to the change request in a letter (Marcinowski 2000) in which it
32 agreed with the DOE that the effects on long-term performance would be minimal. The
33 modeling assumptions used to represent this change are described in Appendix PA-2004,
34 Attachment MASS, Section MASS-20.0. No changes were made to these assumptions since the
35 CRA-2004 PA. These assumptions have also been used in the CRA-2014 PA.

36

1 **MASS-19.0 Evaluation of Waste Structural Impacts, Emplacement** 2 **and Homogeneity**

3 During the development of the CCA PA, the DOE chose to assume random placement of TRU
4 waste in the WIPP, and developed conceptual and numerical models accordingly. The EPA
5 reviewed these models and their results and determined that the DOE had adequately modeled
6 random placement of waste in the disposal system. The CCA PA also assumed that all waste
7 could be modeled as if the waste was emplaced in 55-gallon drums. In accordance with the
8 requirements of 40 CFR § 194.24(d) (U.S. EPA 2004), all PAs have assumed that waste is
9 emplaced in a random or homogeneous manner. The PAs executed in support of compliance
10 applications have not specifically accounted for heterogeneity in waste materials or in waste
11 containers.

12 Additional information about the waste and its emplacement has emerged since the CCA. Waste
13 has been emplaced using several different types of waste containers, including standard waste
14 boxes and pipe overpacks. Waste types, such as supercompacted waste, have been emplaced that
15 were not considered in the CCA inventory (U.S. DOE 2002). At the Idaho National Laboratory,
16 for instance, debris waste is volume-reduced by supercompaction, resulting in a very dense waste
17 form containing a high concentration of CPR material. In addition, the plutonium residues from
18 the Rocky Flats Environmental Technology Site were packaged in pipe overpacks, which are
19 more rigid than the typical 55-gallon drum assumed in the CCA. Actual waste emplacement is
20 determined by the availability of waste at generator sites and the shipping schedules. Pipe
21 overpacks occupy about 43% of the containers emplaced in Panel 1, suggesting that actual
22 emplacement will not be statistically random. As a result of this information, the DOE
23 performed analyses (Hansen et al. 2003) to determine if the waste emplacement assumptions
24 used in PA adequately represent the waste. The analysis, reported in Hansen et al. (Hansen et al.
25 2003), focused on potential effects of supercompacted waste and waste in pipe overpacks on
26 repository performance. Both waste types are structurally stiffer than the generic waste model
27 used in the CCA PA, and the supercompacted waste in particular has high concentrations of CPR
28 materials. The analysis began with a systematic reevaluation of the baseline FEPs to identify
29 specific components of PA that could be affected by supercompacted waste. The reassessment
30 concluded that the FEPs “screened in” were adequate to represent the variety of waste types and
31 containers, and that none of the “screened out” FEPs should be reconsidered for implementation.
32 The FEP assessment concluded that the following could be affected by heterogeneities in the
33 waste materials and waste containers:

- 34 • creep closure of the repository
- 35 • chemical conditions of the waste
- 36 • gas generation models
- 37 • waste mechanical properties

38 Analysis of creep closure of waste-filled rooms, accounting for several types of waste materials
39 and packaging, indicated that a wider range of long-term porosities could occur than that
40 established in the CCA, given the uncertainties about the structural integrity of waste packages

1 and their spatial arrangement in the repository (Park and Hansen 2003). For this reason, the
2 analysis in Hansen et al. (Hansen et al. 2003) treated creep closure as an uncertain variable.
3 Sensitivity analysis showed that this additional uncertainty did not significantly affect the results
4 of PA.

5 Chemical conditions were also reexamined under a range of possible waste arrangements. The
6 assessment found that, regardless of actual waste emplacement, the MgO would still be sufficient
7 to maintain desired chemical conditions if distributed appropriately with the current excess
8 factor. Moreover, the constituents of supercompacted waste would not alter the reactions that
9 determine chemical equilibrium and, consequently, no changes to actinide solubilities or to the
10 gas-generation models were warranted to account for waste heterogeneity. This topic was also
11 addressed during the first recertification in response to comment G-12, in which the EPA
12 requested that the DOE address potential effects of heterogeneous waste loading based on the
13 assumption of homogeneous chemical conditions. The DOE's response indicated that the
14 chemical conditions assumptions adequately addressed nonrandom waste loading (Piper 2004).
15 This was again addressed during the evaluation of the MgO excess factor change from 1.67 to
16 1.20 (Reyes 2008). No changes were made to the chemical conditions model as a result of these
17 investigations.

18 Supercompacted waste contains elevated amounts of CPR materials relative to other waste
19 streams, and these materials generate gas when they come in contact with brine and undergo microbial
20 degradation. The future arrangement of supercompacted waste in the WIPP repository is
21 uncertain. Sensitivity analysis has demonstrated that uncertainty in the spatial distribution and
22 quantity of CPR materials has little effect on PA results. This was shown in an analysis
23 performed during the 2004 recertification while responding to an EPA request for additional
24 information (Response to Comment G-12, Dunagan, Hansen, and Zelinski 2004).

25 DBRs as a consequence of a drilling intrusion are calculated with the assumption of random
26 waste emplacement in the repository. In addition, releases by spallings, DBR, and long-term
27 radionuclide transport assume that radionuclides are homogeneously distributed throughout the
28 waste. A sensitivity analysis determined that PA results are not greatly affected by the
29 assumption of random waste emplacement or by the assumption that radionuclides are
30 homogeneously distributed (Hansen et al. 2003). The representation of the waste properties was
31 also considered; however, it was determined that no changes to permeability, shear strength, or
32 tensile strength were warranted.

33 Based on the analysis reported in Hansen et al. (Hansen et al. 2003), the DOE concluded that:

- 34 1. Explicit representation of the specific features of supercompacted waste and of waste in pipe
35 overpacks, such as structural rigidity, was not warranted in modeling, since PA results were
36 primarily insensitive to the effects of such features.
- 37 2. PA results were not affected significantly by the assumption of nonrandom waste
38 emplacement and the representation of these waste types as a homogeneous material.

39 Homogeneity issues were also addressed in response to another EPA comment during the CRA-
40 2004 completeness review. The EPA questioned in comment C-23-10 whether neglecting

1 container-scale variability was a valid assumption for spallings calculations (Cotsworth 2004).
2 In the CRA-2004 PA, spallings releases were calculated using the average radioactivity in all
3 CH-TRU waste streams. An analysis in Vugrin (Vugrin 2004) compared spallings results using
4 three randomly sampled waste streams against results using the average radioactivity over all
5 CH-TRU waste streams. The analysis concluded that the calculation of spallings releases is not
6 significantly affected by waste-scale variability.

7 The DOE continues to assume in PA that waste is randomly emplaced in the WIPP repository.
8 The CRA-2014 PA continues to use the same waste-related modeling approaches as were used in
9 the CRA-2009 and the CRA-2004 PABC.

10

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