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

Appendix PORSURF-2014 Porosity Surface



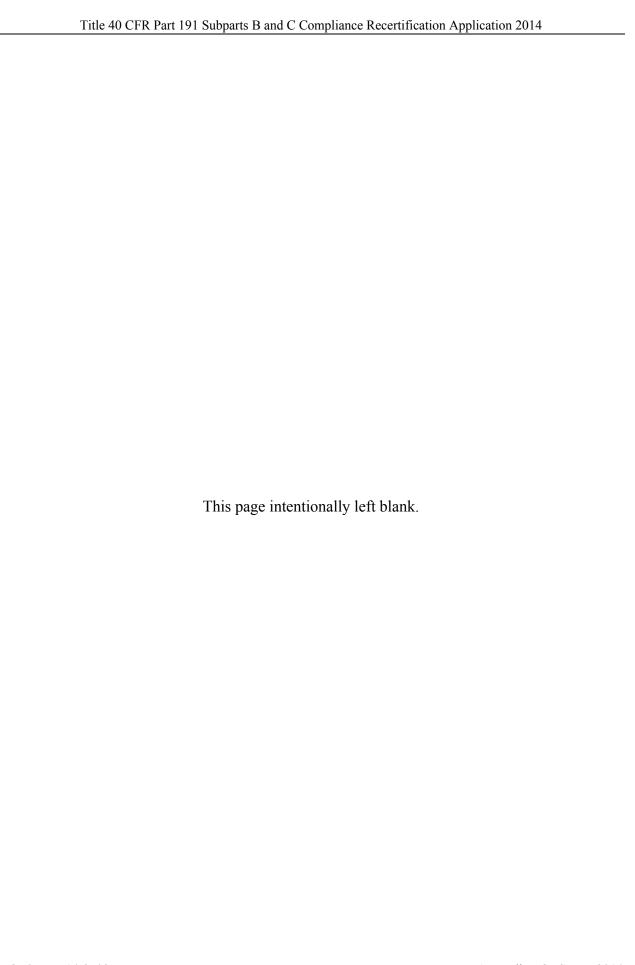
United States Department of Energy Waste Isolation Pilot Plant

Carlsbad Field Office Carlsbad, New Mexico

Compliance Recertification Application 2014 Appendix PORSURF-2014

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Acronyms and Abbreviations

CCA Compliance Certification Application

CFR Code of Federal Regulations

CRA Compliance Recertification Application

DOE U.S. Department of Energy

EPA U.S. Environmental Protection Agency

f scaling factor for the gas generation rate

K Kelvin

m meter

mol mole

MPa megapascal

N number of moles

 N_{drums} number of waste drums in a room

p pressure

PA Performance Assessment

Pa pascal

 ϕ porosity

R universal gas constant

r gas generation rate

s second

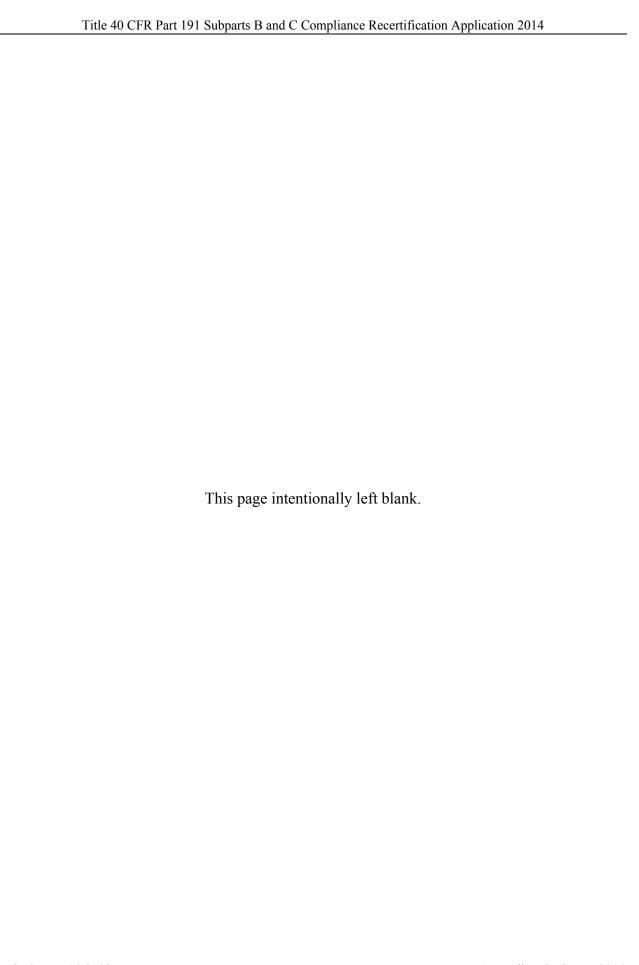
T absolute temperature

t time

V volume

WIPP Waste Isolation Pilot Plant

yr year



PORSURF-1.0 Introduction

- 2 Both creep closure of the salt and the presence of either brine or gas in the U.S. Department of
- 3 Energy (DOE) Waste Isolation Pilot Plant (WIPP) waste disposal region influence time-
- 4 dependent changes in void volume in the waste disposal area. As a consequence, these processes
- 5 influence two-phase fluid flow of brine and gases through the disposal area and its capacity for
- 6 storing fluids. For performance assessment (PA), a porosity surface method is used to indirectly
- 7 couple mechanical closure with two-phase fluid flow calculations implemented in the
- 8 BRAGFLO code (see Appendix PA-2014, Section PA-4.2). The porosity surface approach is
- 9 used because current codes are not capable of fully coupling creep closure, waste consolidation,
- brine availability, and gas production and migration. The porosity surface method incorporates
- the results of closure calculations obtained from the SANTOS code, a quasistatic, large
- deformation, finite element structural analysis code (Stone 1997a). The adequacy of the method
- is documented in Freeze (Freeze 1996), who concludes that the approximation is valid so long as
- 14 the rate of room pressurization in final calculations is bounded by the room pressurization history
- used to develop the porosity surface.
- 16 The porosity surface used in the Compliance Recertification Application (CRA) of 2014 (CRA-
- 17 2014) PA is the same surface used for the Compliance Certification Application (CCA) (U.S.
- 18 DOE 1996), the CRA of 2004 (CRA-2004) (U.S. DOE 2004), and the CRA of 2009 (CRA-2009)
- 19 (U.S. DOE 2009). Consequently, the models and parameters used to calculate this surface are
- 20 unchanged from the CCA PA. For information on the porosity surface used in the CCA PA, see
- 21 the CCA, Appendix PORSURF (U.S. DOE 1996).
- A separate analysis considered the potential effects on repository performance of uncertainty in
- 23 the porosity surface (U.S. DOE 2009, Appendix MASS-2009, Section MASS-21.0). Uncertainty
- in the porosity surface can arise from heterogeneity in the rigidity of waste packages and from
- 25 uncertain spatial arrangements of waste in the repository. The analysis considered four porosity
- surfaces, including the surface from the CCA, which represented various bounding combinations
- of waste package rigidity and waste initial porosity. The analysis concluded that uncertainty in
- 28 the porosity surface did not have significant effects on repository performance, and
- recommended the continued use of the CCA porosity surface in PA.

1 PORSURF-2.0 Creep Closure Method

- 2 Creep closure is accounted for in BRAGFLO by changing the porosity of the waste disposal area
- according to a table of porosity values, termed the porosity surface. The porosity surface is
- 4 generated using SANTOS, a nonlinear finite element code. Disposal room porosity is calculated
- 5 over time, for different rates of gas generation and gas production potential, to construct a three-
- 6 dimensional porosity surface representing changes in porosity as a function of pressure and time
- 7 over the 10,000-year simulation period.
- 8 The completed porosity surface is compiled in tabular form and is used in the solution of the gas
- 9 and brine mass balance equations presented in Appendix PA-2014, Section PA-4.2.1. Porosity is
- interpolated from the porosity surface corresponding to the calculated gas pressure at time step
- 11 t_n . This is done iteratively, as decreases in the porosity will increase the pressure. The closure
- data provided by SANTOS can be viewed as a series of surfaces, with any gas generation history
- computed by BRAGFLO constrained to fall on this surface. Various techniques described in
- 14 Freeze, Larson, and Davies (Freeze, Larson, and Davies 1995) were used to check the validity of
- 15 this approach, and it was found to be a reasonable representation of the behavior observed in the
- 16 complex models.
- In SANTOS, the gas pressure in the disposal room at time t_n is computed from the ideal gas law
- by the following relationship:

$$p_g = \frac{NRT}{V}$$

- where N is the number of moles of gas at time t_n , R is the universal gas constant (8.31)
- 21 $\text{m}^3 \cdot \text{Pa/mol} \cdot \text{K}$), T is the absolute temperature in kelvins (K) (constant at 300 K), and V is the free
- volume of the room at time t_n . The number of moles of gas is computed as

$$N_t = N_{t-1} + N_{drums} \times f \times r(t) \times (t_n - t_{n-1})$$

- 24 where r(t) is the gas generation rate (mol/drum/yr) at time t for the scaling factor f and N_{drums} is
- 25 the number of drums of waste in the room (6804 drums/room). The base gas generation rate in
- 26 SANTOS is

$$r(t) = \begin{cases} 2 \mod / \operatorname{drum} / yr, & 0 \le t \le 550 \ yr \\ 1 \mod / \operatorname{drum} / yr, & 550 \ yr < t \le 1050 \ yr \end{cases}$$

- The base gas generation rate r(t) is representative of relatively high gas production rates from
- both microbial degradation of cellulosic, plastic, and rubber materials and from anoxic corrosion
- of iron-based metals (Appendix PA-2014, Section PA-4.2.5; Butcher 1997a; Roselle 2013). To
- 31 provide a range of SANTOS results that spans the possible range of pressure computed by
- 32 BRAGFLO, the gas generation rate is varied by the scaling factor f. Thirteen values of f are used
- 33 to construct the porosity surface: f = 0.0, 0.025, 0.05, 0.1, 0.2, 0.4, 0.5, 0.6, 0.8, 1.0, 1.2, 1.6, and
- 34 2.0. The condition f = 0 represents the state of the repository when no gas is produced; f = 2
- represents twice the base gas generation rate.

- 1 In SANTOS, gas generation is included to introduce a range of values for gas pressure during
- 2 room closure, thereby capturing its effects. The use of the scaling factor f ensures that SANTOS
- 3 results span a wide range of possible gas generation rates and potentials.

1 PORSURF-3.0 Conceptual Model for Porosity Surface

- 2 The ability of salt to deform with time, eliminate voids, and create an impermeable barrier
- around the waste was one of the principal reasons for locating the WIPP repository in a bedded
- 4 salt formation (National Academy of Sciences National Research Council 1957, pp. 4,5). The
- 5 creep closure process is a complex and interdependent series of events starting after a region
- 6 within the repository is excavated. Immediately upon excavation, the equilibrium state of the
- 7 rock surrounding the repository is disturbed, and the rock begins to deform and return to
- 8 equilibrium. At equilibrium, deformation eventually ceases as the waste region has undergone as
- 9 much compaction as is possible under the prevailing lithostatic stress field and the differential
- stresses in the salt approach zero.
- 11 Creep closure of a room begins immediately upon excavation and causes the volume of the
- cavity to decrease. If the room were empty, rather than partially filled with waste, closure would
- proceed until the void volume created by the excavation is eliminated; the surrounding halite
- would then return to its undisturbed, uniform stress state. In a waste-filled room, the rock will
- 15 contact the waste and the rate of closure will decrease as the waste compacts and stiffens.
- 16 Closure will eventually cease when the waste can take the full overburden load without further
- deformation. Initially, unconsolidated waste can support only small loads, but as the room
- continues to close after contact with the waste, the waste will consolidate and support a greater
- 19 portion of the overburden load.
- 20 The presence of gas in the room will retard the closure process due to pressure buildup. As the
- 21 waste consolidates, pore volume is reduced and pore pressure increases (using the ideal gas law).
- In this process, the waste can be considered to be a skeleton structure immersed in a pore fluid
- 23 (the gas). As the pore pressure increases, less overburden weight is carried by the skeleton, and
- 24 more support is provided by the gas. If the gas pressure increases to lithostatic pressure, the pore
- 25 pressure alone is sufficient to support the overburden.

1 PORSURF-4.0 SANTOS Numerical Analyses

- 2 Computing repository creep closure is a particularly challenging structural engineering problem
- 3 because the rock surrounding the repository continually deforms with time until equilibrium is
- 4 reached. Not only is the deformation of the salt inelastic, but it also involves large deformations
- 5 that are not customarily addressed with conventional structural deformation codes. In addition,
- 6 the formation surrounding the repository is heterogeneous in composition, containing various
- 7 parting planes and interbeds with different properties than the salt.
- 8 Waste deformation is also nonlinear, with large strains, and the response of a waste-filled room
- 9 is complicated by the presence of gas. These complex characteristics of the materials making up
- the repository and its surroundings require the use of highly specialized constitutive models.
- Appropriate models have been built into the SANTOS code over a number of years. Principal
- components of these models include the following:
- 1. Disposal Room Configuration and Idealized Stratigraphy. Disposal room dimensions,
- computational configuration, and idealized stratigraphy are defined in the CCA, Appendix
- PORSURF, Attachment 1. The idealized stratigraphy is reproduced in Figure PORSURF-1.
- 16 2. Discretized Finite Element Model. A two-dimensional plane strain model, shown in Figure
- 17 PORSURF-2, is used for the SANTOS analyses. The discretized model represents the room
- as one of an infinite number of rooms located at the repository horizon. The model contains
- 19 1,680 quadrilateral uniform-strain elements and 1,805 nodal points. Contact surfaces
- between the emplaced waste and the surfaces of the room are addressed. The justification for
- 21 this model and additional detail on initial and boundary conditions are provided in the CCA,
- Appendix PORSURF, Attachment 1.
- 23 3. Geomechanical Models. Mechanical material response models and their corresponding
- property values are assigned to each region of the configuration. These models include:
- A. A combined transient-secondary creep constitutive model for clean and argillaceous
- 26 halite
- B. An inelastic constitutive model for anhydrite
- 28 C. A volumetric plasticity model for the emplaced waste
- D. Material properties are provided in the CCA, Appendix PORSURF, Attachment 1.
- 30 Continual testing and reviews of computer codes by the DOE and the U.S. Environmental
- 31 Protection Agency (EPA) from before the CCA have shown that the use of SANTOS and its
- models are adequate for WIPP porosity surface calculations (e.g., Argüello and Holland 1996;
- 33 WIPP PA 2003; U.S. EPA 2005).
- 34 The results of the SANTOS calculations are illustrated in Figure PORSURF-3 and Figure
- 35 PORSURF-4. Figure PORSURF-3 shows disposal room porosity as a function of time for
- various values of the gas generation scaling factor f. Figure PORSURF-4 shows disposal room
- 37 pressure as a function of time for various values of f. When f = 0, no gas is present in the

1	disposal room; thus, disposal room pressure is zero for all times. This pressure curve is omitted
2	from Figure PORSURF-4.

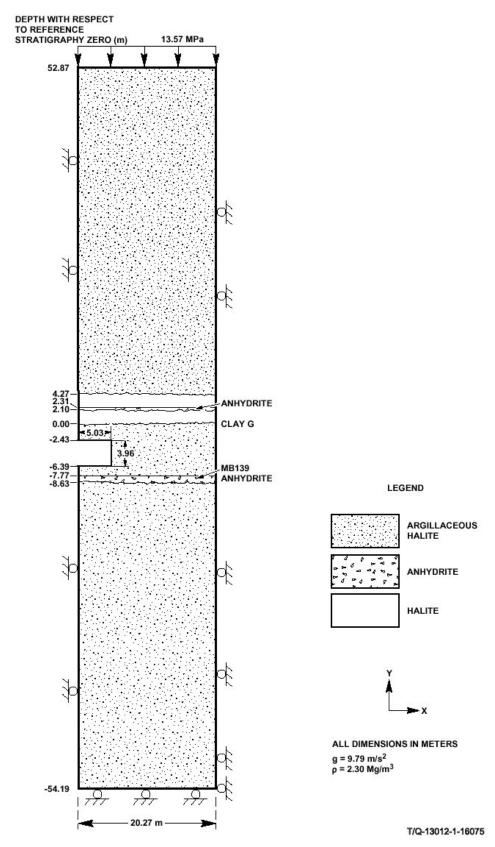


Figure PORSURF-1. Stratigraphy Used for the Porosity Surface Calculations

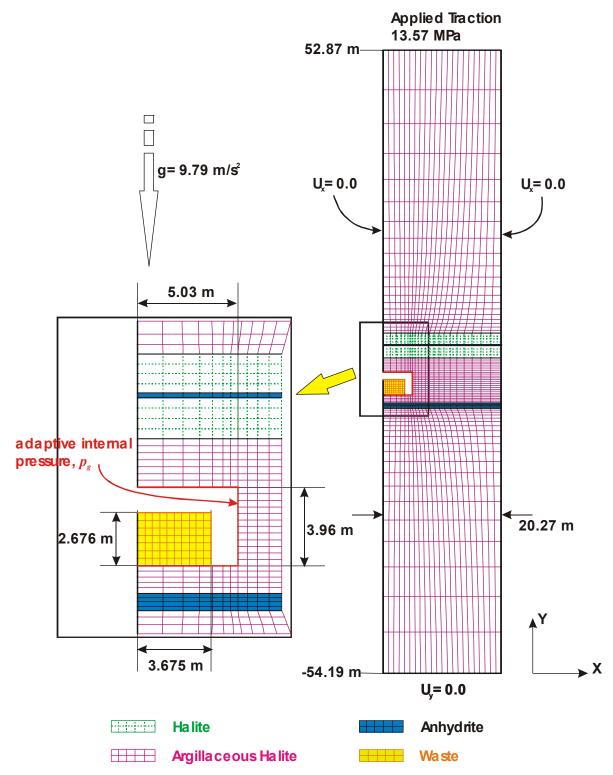
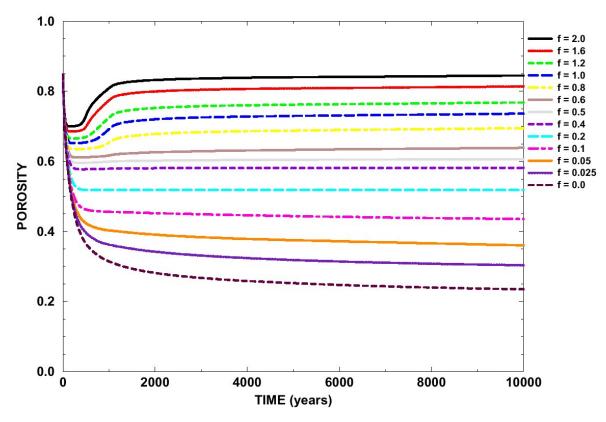


Figure PORSURF-2. Mesh Discretization and Boundary Conditions Used for the Porosity Surface Calculations

3

DOE/WIPP 14-3503 PORSURF-8 Appendix PORSURF-2014



2 Figure PORSURF-3. Disposal Room Porosity for Various Values of the Scaling Factor f

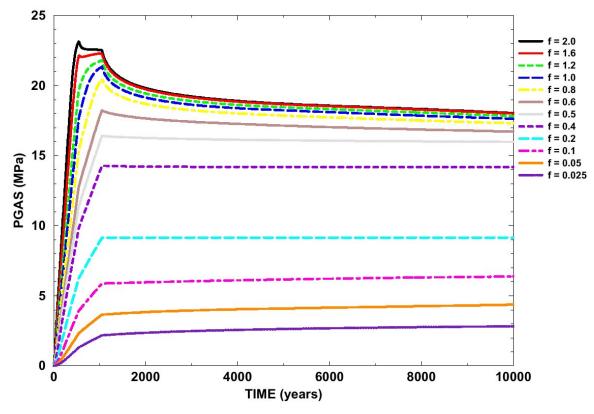


Figure PORSURF-4. Disposal Room Pressure for Various Values of the Scaling Factor f

1 PORSURF-5.0 Implementation of Porosity Surface in BRAGFLO

- 2 As outlined above, the SANTOS program is used to calculate time-dependent porosities and
- 3 pressures in the repository for a range of gas generation rates determined by the scaling factor f.
- 4 Calculation with each value of f results in the porosity and pressure curves in Figure PORSURF-
- 5 3 and Figure PORSURF-4.
- 6 The porosity calculated by SANTOS is the intrinsic, or true, porosity, which is defined as the
- 7 ratio of the void volume to the current volume of a (deformable) element of waste. In contrast,
- 8 porosity in BRAGFLO is defined as the ratio of void volume to the original volume of an
- 9 element of waste. Mathematically, the BRAGFLO porosity, ϕ_B , and the intrinsic porosity in
- 10 SANTOS, ϕ , are defined as

$$\phi_{B} = \frac{V_{void}}{V_{0}}$$

$$\phi = \frac{V_{void}}{V}$$

- where V_{void} is the current void volume, V_0 is the original (total) volume, and V is the current
- 13 (total) volume of a waste element.
- 14 The porosities shown in Figure PORSURF-3 are the porosities calculated by SANTOS to be
- used in BRAGFLO. The BRAGFLO porosities are related to the porosities calculated by
- 16 SANTOS by correcting for deformation of the waste during repository closure. The relationship
- between ϕ_B and ϕ is given by

$$\phi_B = \frac{1 - \phi_0}{1 - \phi} \phi$$

- where ϕ_0 is the initial porosity of the waste. Note that the values of ϕ_B and ϕ are equal at the
- 20 initial porosity before the waste starts to compact.
- Brine pressures $p_b(t)$ obtained in the waste disposal regions are used in conjunction with the
- results in Figure PORSURF-3 and Figure PORSURF-4 to estimate porosity in the waste-filled
- 23 regions for the BRAGFLO calculations. In the CRA-2014 PA, brine pressure and gas pressure
- are set as equal in the waste-filled regions, i.e., capillary pressure is not included (see Appendix
- 25 PA-2014, Section PA-4.2). This is unchanged from the CCA and previous two CRA PAs.
- Given a value for p(t), BRAGFLO looks at the porosity surface to find indices for times in the
- porosity table so that

$$28 t_1 \le t \le t_2$$

- Next, BRAGFLO determines whether the current pressure is above the pressure curve in the
- interpolation table corresponding to the maximum f value or corresponding to the minimum f

- value in the table. If p lies above the curve formed by the points $(t_1, p(t_1, f_{\text{max}}))$ and 1
- $(t_2, p(t_2, f_{\text{max}}))$, the porosity is calculated by interpolation using the following formula: 2

3
$$\phi = \phi(t_1, f_{\text{max}}) + \frac{\phi(t_2, f_{\text{max}}) - \phi(t_1, f_{\text{max}})}{t_2 - t_1} (t - t_1)$$

- Similarly, if p lies below the curve formed by the points $(t_1, p(t_1, f_{\min}))$ and $(t_2, p(t_2, f_{\min}))$, 4
- 5 the porosity is calculated by interpolation using the following formula:

$$\phi = \phi(t_1, f_{\min}) + \frac{\phi(t_2, f_{\min}) - \phi(t_1, f_{\min})}{t_2 - t_1} (t - t_1)$$

- 7 For values of p that do not lie above or below the maximum and minimum p(t, f) curves in the
- interpolation table, BRAGFLO finds f values f_1 and f_2 so that the point (t, p) lies between two 8
- curves $(t, p(t, f_1))$ and $(t, p(t, f_2))$. This is illustrated in Figure PORSURF-5. 9

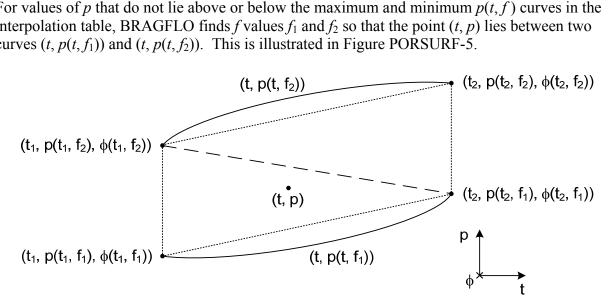


Figure PORSURF-5. Location of Points in Porosity Table around Point (t, p)

- 12 Interpolation is performed on the triangle formed by the set of points that encloses the point (t, t)
- 13 p). For example, in Figure PORSURF-5, the points constituting the lower triangle would be used
- for interpolation. Interpolation on the triangle is calculated from the areas of the three triangles 14
- in the plane of t and p that can be formed from the point (t, p) and the vertices of the enclosing 15
- triangle, as illustrated in Figure PORSURF-6. The porosity is then calculated from 16

17
$$\phi(t,p) = \frac{A_1}{A}\phi(t_1,f_2) + \frac{A_2}{A}\phi(t_1,f_1) + \frac{A_3}{A}\phi(t_2,f_1)$$

18 where A is the total area of the triangles $(A_1 + A_2 + A_3)$ in Figure PORSURF-6.

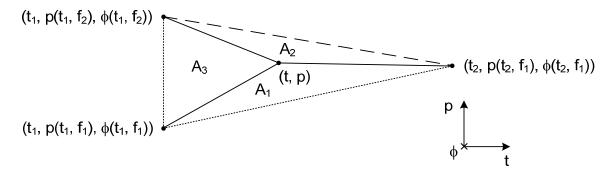


Figure PORSURF-6. Triangular Interpolation to Determine the Porosity at (t, p)

- 3 At t = 0 (i.e., immediately after the operational period; see Appendix PA-2014, Section PA-4.2),
- 4 interpolation is performed using the points $(t_1, p(t_1, f_1), \phi(t_1, f_1)), (t_2, p(t_2, f_1), \phi(t_2, f_1)),$ and
- 5 $(t_2, p(t_2, f_2), \phi(t_2, f_2))$. This is because at t = 0, the two points vertically separated in Figure
- 6 PORSURF-6 at t_1 are equal (the porosity is equal to the initial value at t = 0 for all values of f).

1 PORSURF-6.0 Dynamic Closure of the North End and Hallways

- 2 The porosity surface method is not used to model the north end of the repository occupied by the
- 3 experimental and operational regions. During development of the CCA PA, a supporting
- 4 analysis compared brine and gas flow results for two models for closure of the north end of the
- 5 repository: a dynamic closure model and a baseline model, in which the porosity and
- 6 permeability of these regions were held constant (Vaughn, Lord, and MacKinnon 1995). The
- 7 study examined the effect of these two approaches on brine releases to the accessible
- 8 environment for both disturbed and undisturbed conditions, as well as the effects on brine
- 9 pressures and brine saturations in the modeled regions. The study concluded that the baseline
- case (assuming constant low porosity and high permeability) consistently led to either similar or
- more conservative brine pressures and brine saturations, thereby overestimating potential
- releases relative to the dynamic consolidation case. Consequently, PA uses the simplifying case
- of constant porosity and permeability in the north end of the repository, rather than modeling
- 14 dynamic closure of these areas.

PORSURF-7.0 Additional Information

- 2 The following attachments were included in the CCA, Appendix PORSURF (U.S. DOE 1996) to
- 3 document additional details of the porosity surface method:
- 4 1. The CCA, Appendix PORSURF, Attachment 1, Proposed Model for the Final Porosity
- 5 Surface Calculations. This memo documents preliminary configuration and constitutive
- 6 property values for the final porosity surface calculations. Tables in the memo include
- 7 elastic and creep properties for clean halite and argillaceous halite, volumetric strain data and
- 8 material constants used in the volumetric-plasticity model for waste, and elastic and Drucker-
- 9 Prager constants assigned to anhydrite Marker Bed 139. This attachment was supplemented
- and updated subsequent to the CCA by Butcher (Butcher 1997a and Butcher 1997b).
- 11 2. The CCA, Appendix PORSURF, Attachment 2, Baseline Inventory Assumptions for the
- 12 Final Porosity Surface Calculations. This memo discusses the effect of changes in the
- 13 Transuranic Waste Baseline Inventory Report on the SANTOS analyses.
- 14 3. The CCA, Appendix PORSURF, Attachment 3, Corrosion and Microbial Gas Generation
- 15 *Potentials*. This memo discusses the rationale for the base gas production potentials of 1,050
- mol per drum for corrosion and 550 mol per drum for microbial decay in the SANTOS
- 17 analyses.

- 18 4. The CCA, Appendix PORSURF, Attachment 4, Resolution of Remaining Issues for the Final
- 19 Disposal Room Calculations. This memo provides additional detail on the disposal room
- 20 elevation, determination of plastic constants for transuranic waste, and determination of
- SANTOS input constants for clean halite, argillaceous halite, and anhydrite.
- 5. The CCA, Appendix PORSURF, Attachment 5, Sample SANTOS Input File for Disposal
- 23 Room Analysis. A representative sample input file is provided in this attachment. This
- listing does not include the adaptive pressure boundary condition subroutine used to calculate
- 25 the gas pressure in a disposal room (Stone 1997b).
- 26 6. The CCA, Appendix PORSURF, Attachment 6, Final Porosity Surface Data. This
- 27 attachment provides SANTOS results for selected gas generation scaling factors f = 0.5, 1.0,
- and 2.0. This attachment was updated and published as a formal SAND report (Stone 1997b)
- subsequent to submittal of the CCA.
- 7. The CCA, Appendix PORSURF, Attachment 7, SANTOS A Two-Dimensional Finite
- 31 Element Program for the Quasistatic, Large Deformation, Inelastic Response of Solids. This
- report documents the SANTOS code.

1 **PORSURF-8.0 References**

- 2 (*Indicates a reference that has not been previously submitted.)
- 3 Argüello, J.G. and J.F. Holland. 1996. SANTOS Verification and Qualification Document.
- 4 ERMS 235675. Albuquerque, NM: Sandia National Laboratories.
- 5 Butcher, B.M. 1997a. A Summary of the Sources of Input Parameter Values for the Waste
- 6 Isolation Pilot Plant Final Porosity Surface Calculations. SAND97-0796. Albuquerque, NM:
- 7 Sandia National Laboratories.
- 8 Butcher, B.M. 1997b. Waste Isolation Pilot Plant Disposal Room Model. SAND97-0794.
- 9 Albuquerque, NM: Sandia National Laboratories.
- 10 Freeze, G.A. 1996. Repository Closure–Reasoned Argument for FEP Issue DR12. ERMS
- 11 413328. Albuquerque, NM: Sandia National Laboratories.
- 12 Freeze, G.A., K.W. Larson, and P.B. Davies. 1995. Coupled Multiphase Flow and Closure
- 13 Analysis of Repository Response to Waste-Generated Gas at the Waste Isolation Pilot Plant
- 14 (WIPP). SAND93-1986. Albuquerque, NM: Sandia National Laboratories.
- 15 National Academy of Sciences-National Research Council (NAS-NRC). 1957. The Disposal of
- 16 Radioactive Waste on Land. Publication 519. Washington, DC: National Academy of Sciences.
- 17 Roselle, G.T. 2013. Determination of Corrosion Rates from Iron/Lead Corrosion Experiments
- 18 to be used for Gas Generation Calculations, Rev. 1. ERMS 559077. Carlsbad, NM: Sandia
- 19 National Laboratories.*
- 20 Stone, C.M. 1997a. SANTOS A Two-Dimensional Finite-Element Program for the
- 21 Quasistatic, Large Deformation, Inelastic Response of Solids. SAND90-0543. Albuquerque,
- 22 NM: Sandia National Laboratories.
- 23 Stone, C.M. 1997b. Final Disposal Room Structural Response Calculations. SAND97-0795.
- 24 Albuquerque, NM: Sandia National Laboratories.
- U.S. Department of Energy. (DOE) 1996. Title 40 CFR Part 191 Compliance Certification
- 26 Application for the Waste Isolation Pilot Plant. 21 vols. DOE/CAO 1996-2184. Carlsbad, NM:
- 27 Carlsbad Area Office.
- 28 U.S. Department of Energy. (DOE) 2004. Title 40 CFR Part 191 Compliance Recertification
- 29 Application for the Waste Isolation Pilot Plant. 10 vols. DOE/WIPP 2004-3231. Carlsbad, NM:
- 30 Carlsbad Field Office.
- 31 U.S. Department of Energy. (DOE) 2009. Title 40 CFR Part 191 Compliance Recertification
- 32 Application for the Waste Isolation Pilot Plant. DOE/WIPP 09-3424. Carlsbad, NM: Carlsbad
- Field Office.

- 1 U.S. Environmental Protection Agency. (EPA) 2005. Technical Support Document for Section
- 2 194.27: SANTOS Computer Code in WIPP Performance Assessment. Docket No.: A-98-49, II-
- 3 B1-17. Washington, DC: U.S. EPA Office of Radiation and Indoor Air.
- 4 Vaughn, P., M. Lord, and R. MacKinnon. 1995. DR-3: Dynamic Closure of the North-End and
- 5 Hallways. Summary Memorandum of Record to D.R. Anderson; Subject: FEP Screening Issue
- 6 DR-3; dated December 21, 1995. ERMS 230794. Albuquerque, NM: Sandia National
- 7 Laboratories.
- 8 WIPP PA. 2003. Verification and Validation Plan/Validation Document for SANTOS (Version
- 9 2.1.7). ERMS 530091. Carlsbad, NM: Sandia National Laboratories.