



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
FEB 14 2012

Mr. Alan Perrin
U.S. Environmental Protection Agency
Office of Air and Radiation
401 M Street, S.W.
Washington, DC 20460

Subject: Planned Change Notice for Placement of Magnesium Oxide Supersacks

Dear Mr. Perrin:

Consistent with your approval letter of February 11, 2008, the Waste Isolation Pilot Plant (WIPP) is maintaining a minimum of 1.2 excess factor in each disposal room and a 94 percent or greater reactivity of magnesium oxide (MgO), verified annually. Our experience has shown, when placing an MgO supersack on each waste column, the excess factor has ranged from 1.22 to 2.85.


Based on historical data, the Department of Energy is placing an amount of MgO in the repository that exceeds the requirements established in your February 11, 2008 letter. We are informing you that we are instituting a process that allows us to emplace the MgO on every other waste row and to adjust the frequency to accommodate high cellulose, plastic and rubber (CPR) waste streams. Enclosed is the distribution analysis supporting the change. We believe this change will allow us to manage the placement of MgO more efficiently.

Our new process will:

- Continue to calculate the excess factor at the end of each shift when waste emplacement data are uploaded to the WIPP Waste Data System.
- Continue to allow personnel designated by procedure to direct additional MgO be emplaced during the next shift of waste disposal activities.
- Result in a more efficient distribution of MgO based upon the CPR content of the waste containers being emplaced.

If you have any questions, please contact Mr. Russell Patterson at (575) 234-7457.

Sincerely,


Jose R. Franco, Manager
Carlsbad Field Office

Enclosure

Mr. Alan Perrin

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cc: w/enclosure

T. Peake, EPA	* ED
K. Economy, EPA	ED
J. Walsh, EPA	ED
S. Ghose, EPA	ED
R. Lee, EPA	ED
F. Marcinowski, DOE-EM	ED
C. Gelles, DOE-EM	ED
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cc: w/o enclosure

E. Ziemianski, CBFO	* ED
R. Nelson, CBFO	ED
G. Basabilvazo, CBFO	ED
S. McCauslin, CBFO	ED
F. Sharif, WTS	ED
A. Chavez, RES	ED

*ED denotes electronic distribution