



Department of Energy

Carlsbad Field Office
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AUG 30 2011

Mr. Jonathan D. Edwards, Director
Office of Air and Radiation
Ariel Rios Building, Mail Code 6608J
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Subject: Transmittal of Planned Change Request for Repository Reconfiguration

Dear Mr. Edwards:

This letter and its enclosures provide the U.S. Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) repository reconfiguration planned change request to the U.S. Environmental Protection Agency (EPA). The proposed repository reconfiguration will relocate Panels 9 and 10 from the main north-south access drifts to south of the existing Panels 4 and 5.

The main access drifts in the underground of the WIPP repository have been open for 6 to 30 years and have experienced high convergence rates and local fracturing. Excavations in salt will close naturally because of the visco-elastic properties of salt. The openings were designed to be open for approximately five years to allow excavation, emplacement of waste and closure without compromising waste containers. Widening the access drifts for Remote Handled Transuranic waste disposal will cause an increase in convergence rates as has been observed in certain areas of the repository. Due to the age and mining of waste panels adjacent to the access drifts the higher convergence rates and local fracturing have required more intensive ground control and maintenance efforts and represents a concern for worker safety.

A performance assessment (PA), Panel Closure Redesign and Repository Reconfiguration (PC3R PA), has been performed to evaluate the effects of the proposed change. The results of the PA show that this change will have only a very minor effect on total normalized releases from the repository, and that the WIPP will remain in compliance with the containment requirements in 40 CFR Part 191.

In summary, relocating Panels 9 and 10 to south of the existing Panels 4 and 5 will enhance worker safety and reduce maintenance requirements by providing a more stable geotechnical environment for the two new waste emplacement panels in the repository.

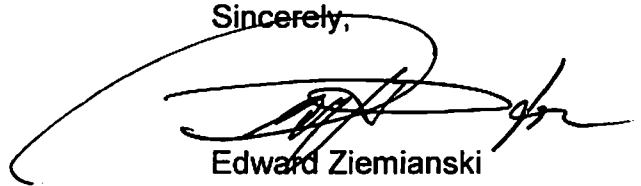
Mr. Jonathan Edwards

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Please contact George T. Basabilvazo at (575) 234-7488 if you have any questions regarding this request.

Sincerely,



Edward Ziemianski
Interim Manager

Enclosures (2)

cc: w/enclosures

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