



Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

NOV 15 2007

Mr. Juan Reyes
Ariel Rios Building, Mail Code: 6608J
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Subject: Transmittal of Planned Change Request for Shielded Containers

Dear Mr. Reyes:

This letter and its attachments provide the U.S. Department of Energy (DOE) request for U.S. Environmental Protection Agency (EPA) approval to emplace a portion of the Remote-Handled (RH) Transuranic (TRU) Waste in shielded containers in the Waste Isolation Pilot Plant (WIPP). RH TRU waste can be emplaced in a shielded container if the dose at the surface of the container is less than 200 mrem/hour. The containers will be transported to WIPP in the Nuclear Regulatory Commission-certified HalfPACT transportation containers. The shielded containers will be managed and emplaced on the floor of the repository in a fashion similar to what is used for CH TRU waste, although these containers will still be recorded as RH TRU waste in the WIPP Waste Information System, and the volume of the waste will be counted against the limit of 250,000 cubic feet (7,079 cubic meters) of RH TRU waste, as set by the Consultation and Cooperation Agreement between the DOE and the state of New Mexico. The proposed approach differs from the present practice of emplacing all RH TRU waste in canisters in the walls of the WIPP repository. This request is being submitted to increase the efficiency of utilization of the WIPP facility by easing the restrictions on waste handling needed during emplacement of RH waste canisters in the walls of the rooms.

The robustness of the shielded container design has been demonstrated by its passing the Department of Transportation (DOT) and the Nuclear Regulatory Commission (NRC) drop tests. A Performance Assessment (PA) was conducted to evaluate the effect of shielded containers on long-term repository performance. The PA showed that the emplacement of RH TRU waste in shielded containers has no discernable impact on the current WIPP baseline or on postulated releases. The attached documentation provides additional information and justification for this Planned Change Request (PCR), along with a Fact Sheet on the subject that can be used to inform the public of DOE's PCR submittal.

This change request was prepared in accordance with Title 40 CFR 194.4 and DOE believes that this is a non-significant change that does not require a rulemaking. If you have any questions regarding this request, please contact Russell Patterson at (505) 234-7457.

Sincerely,

A handwritten signature in black ink that reads "David C. Moody".

David C. Moody
Manager

Enclosure

Mr. Juan Reyes

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cc: w/enclosures

V. Daub, CBFO ED

R. Patterson, CBFO ED

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*ED denotes electronic distribution