UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 10 2004

OFFICE OF
AIR AND RADIATION

R. Paul Detwiler, Acting Manager
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Dr. Detwiler:

The U.S. Environmental Protection Agency's (EPA) inspection reports for inspection numbers EPA-WIPP-6.04-28a (waste management and storage: Subpart A), EPA-WIPP-6.04-28b (waste emplacement), and EPA-WIPP-6.04-28c (certification monitoring parameters) of the Waste Isolation Pilot Plant (WIPP) are enclosed. We performed these inspections during the week of June 28, 2004, under authority of 40 CFR 194.21 and 40 CFR Part 191, Subpart A. We have determined that the activities related to emissions monitoring of waste management and storage that we inspected continue to comply with the requirements of 40 CFR Part 191, Subpart A. In addition, waste emplacement and monitoring activities examined during the inspection were found to be consistent with the Compliance Certification Application as approved by EPA in our certification decision of May 18, 1998. We identified one concern related to the waste emplacement inspection.

During the waste emplacement inspection, EPA examined the capabilities of the Department of Energy (DOE) to track the total amount of magnesium oxide (MgO) placed in the WIPP as waste is emplaced. Magnesium oxide is the only engineered barrier in the disposal system and the amount needed in the repository is proportional to the amount of cellulosics, plastics and rubber materials (CPR). While we did not find any evidence to suggest that there are errors in the MgO placement, we have a concern that the total amount of MgO co-located with WIPP waste cannot be verified because DOE does not appear to have a real-time system to track and calculate the actual MgO placed with WIPP waste at disposal. A mechanism to track MgO placement is important to verify that sufficient MgO is present to fulfill its function as an engineered barrier.

In the March 26, 2004 decision (A-98-49, II-B3-68) to allow super compacted waste from the Advanced Mixed Waste Treatment Facility, EPA required that DOE develop a plan to track MgO and to be able to verify that the appropriate MgO amounts are placed in the repository to

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maintain the barrier. EPA understands that DOE is working on an MgO emplacement plan in response to EPA's concerns and that the plan will discuss how DOE will track and verify the emplaced MgO. We will review the plan to ensure that DOE can track and verify emplaced MgO in the repository. As stated previously, the plan needs to be approved by EPA before compacted waste from the Advanced Mixed Waste Treatment Facility or other waste with high CPR can be shipped to WIPP.

If you have any questions regarding the enclosed reports, please call Betsy Forinash at (202) 564-9233.

Sincerely,

Bonnie C. Gitlin, Acting Director
Radiation Protection Division

Enclosures

cc: Russ Patterson, DOE/CBFO
Steve Casey, DOE/CBFO
Steve Zappe, NMED
EPA WIPP Team
Lynne Smith, DOE/EM

DOCKET NO: A-98-49
Item: II-B3-71

Monitoring Inspection Report

INSPECTION No. EPA-WIPP-6.04-28c
OF THE
WASTE ISOLATION PILOT PLANT
June 28 to July 1, 2004

U. S. ENVIRONMENTAL PROTECTION AGENCY
Office of Radiation and Indoor Air
Center for Federal Regulation
1200 Pennsylvania Avenue, NW
Washington, DC 20460

August 2004

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1.0 Executive Summary

The U.S. Environmental Protection Agency (EPA) conducted an inspection of the Department of Energy's (DOE) Waste Isolation Pilot Plant (WIPP) on June 28 to July 1, 2004, as part of our continuing WIPP oversight program. The purpose of this inspection was to verify that DOE is adequately monitoring the ten parameters listed in the Compliance Certification Application (CCA), Volume 1, Section 7.0, in particular Table 7-7 (See Table 1). Attachment A contains the checklist and the inspection plan used by the inspectors, and Attachment B lists documents reviewed by the inspectors.

The inspection examined the implementation of monitoring for geomechanical, hydrological, waste activity, drilling related, and subsidence parameters. The inspectors toured locations where measurements are taken, reviewed parameter databases, and reviewed documents and procedures directing these monitoring activities.

The inspectors found that DOE, through its contractor Washington TRU Solutions (WTS), effectively implemented the monitoring programs at WIPP for all areas. EPA did not have any findings or concerns. The inspection team also confirmed that the results of DOE monitoring programs are reported annually.

2.0 Scope

The WIPP Compliance Criteria (40 CFR Part 194.42(a)) require DOE to "conduct an analysis of the effects of disposal system parameters on the containment of waste in the disposal system." The results of these analyses were included in the 1998 CCA and were used to develop pre-closure and post-closure monitoring requirements.

Volume 1, Section 7.0, of the CCA documented DOE's analysis of monitoring. Table 7-7 of the CCA lists the ten parameters that DOE determined may affect the disposal system. These parameters are grouped into major categories and listed in Table 1.

Table 1 - Monitored Parameters

Geomechanical Parameters-	**Waste Activity Parameter-**
-Creep closure,	-Waste Activity
-Extent of deformation,	
-Initiation of brittle deformation, and	**Subsidence Parameter-**
-Displacement of deformation features.	-Subsidence measurements
Hydrological Parameters-	**Drilling Related Parameters-**
-Culebra groundwater composition and	-Drilling rate and
-Change in Culebra groundwater flow direction.	-The probability of encountering a Castile brine reservoir.

We accepted these ten monitoring parameters in the certification issued on May 18, 1998. This inspection was performed under authority of 40 CFR 194.21 to verify the continued effectiveness of the parameter monitoring program at WIPP. Inspection activities included an examination of monitoring and sampling equipment both on and off site, and in the underground. We also reviewed sampling procedures and measurement techniques and verified implementation of an effective quality assurance program.

3.0 Inspection Team, Observers, and Participants

The inspection team consisted of three EPA staff.

Inspection Team Member	Position	Affiliation
Chuck Byrum	Inspection Team Leader	EPA
Nick Stone	Inspector	EPA
Tom Peake	Inspector	EPA

Numerous DOE staff and contractors participated in the inspection; below is a partial list.

DOE/Contractor Participates	Affiliation/Organization
Stan Patchet	WTS
Joel Siegel	WTS
Rey Carrasco	WTS
Richard Farrell	DOE
Steve Casey	DOE
Dave Kump	WTS
Dave Speed	WTS
Dave Hughes	WTS

The inspection began on Monday, June 28, 2004, at 1100 with a review of the subsidence monitoring program, at 1300 with a review of the geomechanical monitoring program, and at 1400 with a meeting with presentations by DOE/CBFO and WTS that covered an overview of the status of elements of the monitoring program.

The inspection team reviewed various activities to verify effective implementation of the plans and procedures. Inspectors observed a demonstration of the WIPP Waste Information System (WWIS), which is used to track the waste shipped from TRU waste sites. Inspectors also

reviewed the Delaware Basin Drilling Surveillance Program, Groundwater Monitoring Program, and the Geomechanical Monitoring Program.

4.0 Performance of the Inspection

EPA inspectors reviewed three fundamental areas to verify continued implementation of the DOE monitoring program during the pre-closure phase: 1) written plans and procedures, 2) quality assurance procedures and records, and 3) results of the monitoring program in the form of raw data, intermediate reports, and final annual reports, if appropriate. The inspection checklist in Attachment A provides details of inspection activities.

4.1 Monitoring of Geomechanical Parameters

DOE committed to measure four geomechanical parameters in the CCA: creep closure, extent of deformation, initiation of brittle deformation, and displacement of deformation features. WIPP has four programs that supply information for these four parameters: the geomechanical monitoring program, the geosciences program, the ground control program, and the rock mechanics program. These programs are documented in the WIPP Geotechnical Engineering Program Plan, WP 07-01. The results of the Geotechnical Engineering Program are documented in the Geotechnical Analysis Report for July 2002 - June 2004, DOE/WIPP-00-3177, Volumes 1 and 2.

Inspectors toured and reviewed underground instrumentation, the computer database, and field data sheets used to record raw measurement data. They also examined output convergence, roof-to-floor measurements, checkprints to verify implement of the measurement plan.

4.2 Monitoring of Hydrological Parameters

DOE committed to measure two hydrological parameters in the CCA: Culebra groundwater composition and changes in the Culebra groundwater flow direction. Related parameters are measured and documented in the WIPP environmental monitoring program. These programs are documented in the WIPP Groundwater Monitoring Program Plan, WP 02-1. Results of this program are documented in the Waste Isolation Pilot Plant Site Environmental Report, Calender Year 2002, DOE/WIPP 03-2225. This document describes the groundwater monitoring program and presents results for the previous year.

During the 2004 inspection inspectors requested information about changes in the program since last year. Joel Siegel discussed the two wells reconfigured to monitor the Bell Canyon, wells reconfigured and drilled to monitor Culebra water levels, and a pump test done to evaluate the characteristics of the Culebra. He also described a test program to evaluate the effectiveness of collecting water levels by satellite. Mr. Siegel also led a tour of the newly drilled SNL monitor wells to verify completion and sampling techniques.

4.3 Monitoring of Waste Activity Parameters

DOE committed to monitor the activity of waste emplaced into the CCA. This parameter is part of the extensive database collected for each container shipped to WIPP and is stored in the WIPP Waste Information System (WWIS). The WWIS is a software system that screens waste container data and provides reports on the transuranic (TRU) waste sent to WIPP. The requirements for the WWIS are discussed in the WIPP Waste Information Program and System Data Management Plan, WP 08-NT.01.

Dave Speed demonstrated that the WWIS can receive data and that the WWIS can generate needed reports. CBFO has committed to annual waste activity reports. Dave Speed showed the inspection team how the WWIS records waste activity information provided by the generator sites and how the computer database produces waste activity reports. The inspection team obtained copies of the Nuclide Report.

4.4 Monitoring of Drilling Related Parameters

DOE committed to measure two drilling related parameters in the CCA: the drilling rate and the probability of encountering a Castile brine reservoir. These parameters are measured as part of the Delaware Basin Drilling Surveillance Plan, WP 02-PC.02. This surveillance program measures and records many parameters related to drilling activities around the WIPP site. The results of the surveillance program are documented annually in the Delaware Basin Annual Report, DOE/WIPP 99-2308.

Inspectors reviewed the drilling surveillance database, examined drilling rate changes, and permitted and active injection wells while interviewing Dave Hughes. Inspectors received a map of recent activity near WIPP.

4.5 Monitoring of Subsidence Parameters

DOE committed to measure subsidence at the WIPP site. This parameter is documented as part of the of the WIPP Underground and Surface Surveying Program, WP 09-ES.01. DOE performs subsidence surveys at the site annually during pre-closure operations. The results of this program are reported annually in the WIPP Subsidence Monument Leveling Survey - 2003, DOE/WIPP 04-2293.

This year Ben Zimmerly showed inspectors how DOE staff or contractors take raw field survey data and calculate final surface elevations.

5.0 Summary of finding, observation, concerns, and recommendations.

Based on program documents, interviews, and field demonstrations during the inspection, we concluded that the monitoring program covers the ten monitor parameters required in the

certification decision; that the monitoring, sample collection, and sample/data analysis procedures reviewed were complete and appropriate; that staff were adequately trained and implemented the procedures adequately; and that appropriate quality assurance measures are applied. For these reasons, we find that DOE has adequately maintained an adequate parameter monitoring during the past year and has the procedures and requirements in place to sustain thier program into the next year. We have no findings or concerns.

Attachment A: Inspection Plan and Checklist

Attachment B: Documents Reviewed

40 CFR 194.42 for year 2004 - DOE WIPP Monitoring Commitments Checklist

	Pre-closure Monitoring Commitments		
#	Question	Comment (Objective Evidence)	Result
	Geomechanical Parameters		
1	Does DOE demonstrate that they have implemented plans/programs/procedures to measure - a) Creep Closure; b) Extent of Deformation; c) Initiation of Brittle Deformation and d) Displacement of Deformation Features during the pre-closure phase of operations as specified in the CCA part of the geomechanical monitoring system? (CCA, Volume 1, Table 7-7; App MON, Table MON-1) 40 CFR 194.42 (c) and (e)	WIPP Geotechnical Engineering Program Plan, WP 07-01, documents the program planned to measure, document, report, and QA these four activities. Section 3.0 of WP 07-01 documents the Geomechanical Monitoring Program and records the activities associated with this program, the methods used, and reporting plans. Section 4.0 of WP 07-01 documents the quality assurance requirements of these activities. During this inspection Rey Carrasco demonstrated the adequacy of the program and that the program produces satisfactory results. He showed samples of convergence measurements, how Panel 2 was impacted by the mining of Panel 3. And how Panel 3 measurements indicated the present of anhydrite stringers near the roof. WTS has enhance roof control to mitigate the impact of these stringers. The inspector toured and reviewed the computer system and databases used to collect and process recorded data.	SAT
2	Does DOE demonstrate that they have implemented an effective quality assurance program for item 1 above? 40 CFR 194.22	During this inspection the EPA inspector evaluated the quality assurance program and found it to be adequate.	SAT
3	Does DOE demonstrate that the results of the geotechnical investigations are reported annually? (CCA, App. MON, Page MON-10)	WP 07-01, page 6, Section 3.2 requires that analysis be performed annually and results are published in the geotechnical analysis report.	SAT

40 CFR 194.42 for year 2004 - DOE WIPP Monitoring Commitments Checklist

	Pre-closure Monitoring Commitments		
#	Question	Comment (Objective Evidence)	Result
	Hydrological Parameters		
1	Does DOE demonstrate that they have implemented plans/programs/procedures to measure - a) Culebra Groundwater Composition; b) Change in Culebra Groundwater Flow Direction during the pre-closure phase of operations as specified in the CCA part of WIPP's groundwater monitoring plan? (CCA, Volume 1, Table 7-7; App MON, Table MON-1) 40 CFR 194.42 (c) and (e)	WIPP Groundwater Monitoring Program Plan, WP 02-1 documents the program planned to measure, document, report, and QA these two activities. WP 02-1 documents the Groundwater Surveillance Program Plan and records the activities associated with this program, methods used, and reporting plans. Section 11.0 of WP 02-1documents quality assurance requirements. Joel Siegel discussed changes to the program over the past year. He also lead a tour of new monitor wells drilled during the year.	SAT
2	Does DOE demonstrate that they have implemented an effective quality assurance program for item 1 above? (CCA, App MON, Page MON-22) 40 CFR 194.22	During this inspection the EPA inspector evaluated the quality assurance program and found it to be adequate.	SAT
3	Does DOE demonstrate that the results of the groundwater monitoring program are reported annually? (CCA, App. MON, Page MON-22)	WP 07-01, page 6, Section 3.2 requires that analysis be performed annually and results are published in the geotechnical analysis report.	SAT

40 CFR 194.42 for year 2004 - DOE WIPP Monitoring Commitments Checklist

	Pre-closure Monitoring Commitments		
#	Question	Comment (Objective Evidence)	Result
	Waste Activity Parameters		
1	Does DOE demonstrate that they have implemented plans/programs/procedures to measure - a) Waste Activity? (CCA, Volume 1, Table 7-7; App MON, Table MON-1) 40 CFR 194.42 (c) and (e)	WIPP Waste Information System Program and Data Management Plan, WP 08-NT.01 describes how the WWIS is used to measure and store waste activity among other things. Dave Speed demonstrated the use of the WWIS and generated numerous reports. Such as the Nuclide Report which summaries isotopes emplaced at WIPP.	SAT
2	Does DOE demonstrate that they have implemented an effective quality assurance program for item 1? (CCA, App WAP, page C-30) 40 CFR 194.22	During this inspection the EPA inspector evaluated the quality assurance program and found it to be adequate.	SAT
3	Does DOE demonstrate that the results of the waste activity parameters are reported annually? (CCA Volume, Section 7.2.4 Reporting)	WP 08-NT.01 Section 6, page 11 "Regulatory Reporting" documents that results are reported annually.	SAT

40 CFR 194.42 for year 2004 - DOE WIPP Monitoring Commitments Checklist

	Pre-closure and Post Closure Monitoring Commitments		
#	**Question**	**Comment (Objective Evidence)**	**Result**
	Drilling Related Parameters		
1	Does DOE demonstrate that they have implemented plans/programs/procedures to measure - a) Drilling Rate; and b) Probability of Encountering a Castile Brine Reservoir? (CCA, Volume 1, Table 7-7; App MON, Table MON-1) 40 CFR 194.42 (c) and (e)	The Delaware Basin Drilling Surveillance Plan, WP 02-PC.02, documents the program planned to measure document, report, and QA these two activities. Section 6.0 of WP 02-PC.02 documents quality assurance requirements. Dave Hughes discussed changes during the past year. He reported on brine encounters, drilling rate calculations, and provided a map of drilling activities near WIPP.	SAT
2	Does DOE demonstrate that they have implemented an effective quality assurance program for item 1 above? (CCA, App DMP, page DMP-9) 40 CFR 194.22	During this inspection the EPA inspector evaluated the quality assurance program and found it to be adequate.	SAT
3	Does DOE demonstrate that the results of the drilling related parameters are reported annually? (CCA Volume, Section 7.2.4 Reporting; App DMP, page DMP-9)	WP 02-PC.02 documents that results are reported annually.	SAT

40 CFR 194.42 for year 2004 - DOE WIPP Monitoring Commitments Checklist

	Pre-closure and Post Closure Monitoring Commitments		
#	**Question**	**Comment (Objective Evidence)**	**Result**
	Subsidence Measurements		
1	Does DOE demonstrate that they have implemented plans/programs/procedures to measure - a) Subsidence measurements? (CCA, Volume 1, Table 7-7; App MON, Table MON-1) 40 CFR 194.42 (c) and (e)	WIPP Underground and Surface Surveying Program, WP 09-ES.01, documents the program used to measure, documents, report, and QA these activities. Ben Zimmerly showed raw field data and how annual results are calculated.	SAT
2	Does DOE demonstrate that they have implemented an effective quality assurance program for item 1? 40 CFR 194.22	During this inspection the EPA inspector evaluated the quality assurance program and found it to be adequate.	SAT
3	Does DOE demonstrate that the results of the subsidence measurements are reported annually? (CCA Volume, Section 7.2.4 Reporting)	WP 09-ES.01 documents that results are reported annually	SAT

#	Documents Reviewed and Copies Received Document Title	194.42 Monitoring Inspection June 2004 Subject Matter	DOE Documents Source
1	Table 7-7 from Chapter 7 of the CCA; Pre-closure and Post-closure Monitored Parameters.	Parameters committed by DOE to be measured. COB-M2004-1	DOE, CCA, Chapter 7, Table 7-7. Attachment D.6
2	CCA, Appendix MON and Attachment MONPAR. In particular Table MON-1, pages MON-10, MON-29	Both documents discuss the pre- and post-closure parameters selected to be monitored at the WIPP site. COB-M2004-2	DOE, CCA documentation.
3	Geotechnical Analysis Report for July 2002 - June 2004, DOE/WIPP-04-3177, Volumes One and Two, March 2004	This report is an example of the results of the geomechanical monitoring program. COB-M2004-A and A2	DOE/WTS
4	Subsidence Monitoring: WIPP Underground and Surface Surveying Program WP 09-ES.01 Revision 4, 07/16/03	Demonstrates DOE's implementation of subsidence monitoring. COB-M2004-B	DOE/WTS
5	Hydrological Monitoring: WIPP Groundwater Monitoring Program Plan WP 02-1 Revision 6, 3/6/03	Demonstrates DOE's implementation of hydrological monitoring. COB-M2004-C	DOE/WTS
6	Strategic Plan for Groundwater Monitoring at the Waste Isolation Pilot Plant DOE/WIPP-03-3230, February 2004	Describes the objectives and goals of the groundwater monitoring program. COB-M2004-Q	DOE/WTS
7	Geomechanical Monitoring: WIPP Geotechnical Engineering Program Plan WP 07-01, Revision 3, 12/17/02	Demonstrates DOE's implementation of geomechanical monitoring. COB-M2004-D	DOE/WTS
8	WIPP Subsidence Monument Leveling Survey - 2003 DOE/WIPP 04-2293, October 2003	This report is an example of the results of the subsidence monitoring program. COB-M2004-E	DOE/WTS
9	Delaware Basin Drilling Surveillance Plan WP 02-PC.02, Revision 0, 03/27/97	Documents DOE's drilling monitoring plan. COB-M2004-F	DOE/WTS
10	WIPP Waste Information System Program and Data Management Plan WP 08-NT.01, Revision 10, 12/12/03	Demonstrates DOE's implementation of waste activity monitoring. COB-M2004-G1	DOE/WTS
11	Delaware Basin Drilling Database Upgrade Process - Management Control Procedure WP 02-EC3002, Revision 1, 06/14/00	Documents how state and commercial well ata is entered. COB-M2004-R	DOE/WTS
12	Electric Submersible Pump Monitoring System Installation and Operation - Technical Procedure WP 02-EM1002, Revision 1, 09/30/99	Installation and operation instructions for submersible pump. COB-M2004-S	DOE/WTS
13	Final Sample and Serial Sample Collection - Technical Procedure WP 02-EM1006, Revision 4, 06/11/03	Describes water sample collection. COB-M2004-T	DOE/WTS

#	Documents Reviewed and Copies Received Document Title	194.42 Monitoring Inspection June 2004 Subject Matter	DOE Documents Source
14	Groundwater Serial Sample Analysis - Technical Procedure WP 02-EM1005, Revision 4, 06/11/03	Instruction for taking serial samples. COB-M2004-W	DOE/WTS
15	WID Quality Assurance Program Description WP 13-1 Revision 24, 08/08/03	Demonstrates DOE's implementation of quality assurance program. COB-M2004-M	DOE/WTS
16	Delaware Basin Monitoring Annual Report DOE/WIPP 99-2308 Revision 4, Sept 30, 2003	Demonstrates DOE's implementation of drilling surveillance program. COB-M2004-N	DOE/WTS
17	Waste Isolation Pilot Plant Site Environmental Report, Calender Year 2002, DOE/WIPP 03-2225, Rev. 1, Sept. 2004	Example of the results of the environmental monitoring program, in particular hydrological parameters. COB-M2004-O	DOE/WTS
18	Subsidence Survey Data Acquisition Report, Technical Procedure WP 09-ES4001, Revision 0 06/13/02	Procedure documents methods used for acquiring data, creating database, and generating report on subsidence monuments COB-M2004-P	DOE/WTS
19	Drilling Related Parameters: Presentation by Joel Siegel on the hydrology program	Update of activities during the past year. COB-M2004-S1	DOE/WTS
20	Waste Activity: Summary of Waste Emplacement Inventory form the 2002 Annual Change Report	Demonstrates the DOE tracks waste activity annually COB-M2004-S2	DOE/WTS
21	Waste Activity: WIPP Waste Information System Repository Report, RP0530, Version 1.2, 06/30/04, 13 pages	Documents the number of containers emplaced at WIPP from the WWIS. COB-M2004-S3	DOE/WTS
22	Waste Activity: WIPP WWIS Administration Status Display	Summary report documenting the total number of containers emplaced at WIPP. COB-M2004-S4	DOE/WTS
23	Waste Activity: WIPP WWIS Nuclide Report, RP0380, Version 1.4, 06/30/04, 10 pages	Detailed report of isotopes presently emplaced in WIPP COB-M2004-S5	DOE/WTS
24	Subsidence Monitoring: Sample of field data, .raw, and processed data, .lev. For northern loop L0224603 from 2003 survery. Includes results of final calculations.	Demonstrates results of subsidence measurements and calculation of results. COB-M2004-S6	DOE/WTS
25	Geomechanical Monitoring: Sample of convergence measurements at S2520 Drift-E920 intersection in panel two and E920 Drift -S2916 Room4 in Panel 3	Demonstrates example of results of geomechanical program. COB-M2004-S7	DOE/WTS
26	Drilling Related Parameters: Location maps that show locations of new monitor wells, SNL-1, SNL-3, SNL-5, SNL-2, SNL-9, SNL-12	COB-M2004-S8	DOE/WTS

#	Documents Reviewed and Copies Received Document Title	194.42 Monitoring Inspection June 2004 Subject Matter	DOE Documents Source
27	Drilling Related Parameters: Table of monitor water level measurements for June 2004	COB-M2004-S9	DOE/WTS
28	Completion and monitoring configuration of new monitor wells, SNL-1, SNL-2, SNL-3, SNL-9, SNL-12	Sample of implementation of drilling related monitoring requirements. COB-M2004-S10	DOE/WTS
29	Drilling Related Parameters: Map of Hydrocarbon Wells Within The Nine Township Area Surrounding The WIPP Site, DBM-46, June 2004	COB-M2004-S11	DOE/WTS

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