



Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221
May 18, 2000

MAY 2000
RECEIVED

Mr. John Kieling, Program Manager
Hazardous Waste Permitting
Hazardous and Radioactive Materials Bureau
2044 A Galisteo St.
Santa Fe, NM 87502

Dear Mr. Kieling:

Subject: Waste Isolation Pilot Plant (WIPP), Orange Marker Bed (OMB),
Operational Change

The purpose of this letter is to inform the New Mexico Environment Department (NMED) of an operational change in the WIPP due to a need to address safety and operational issues associated with excavation specifically associated with the Orange Marker Bed (OMB) in the disposal horizon. Note 10 of Drawing 51-W-214-W located in Attachment M3 of the WIPP Hazardous Waste Facility Permit states "Excavation shall follow the orange marker bed unless otherwise indicated." Due to fluctuations that naturally occur in the elevations of the OMB, i.e., approximately 12 inches, it is not possible to maintain a level excavation for the floor when maintaining a constant 6 feet distance from this bed. When a constant 6 foot distance is maintained, the floor of each drift and room undulates with the elevation changes of the OMB. The uneven floor in each drift and room results in unstable transport of the waste containers when they are moved to the disposal panels and the possibility of containers tipping during emplacement and storage in the panels.

The WIPP plans to enhance the safety and operational standards of the repository by allowing an even floor to be mined instead of following the OMB as identified in the WIPP Hazardous Waste Facility Permit, Attachment M3. In Attachment M3, Drawing 51-W-214-W, Note 4 it is stated: "Disposal horizon may be selected within the envelope based on geomechanical, operational, and safety considerations." Maintaining a level floor is a primary safety and operational concern insuring the stability of drums during transport within the underground and emplacement. Operationally, it is easier to maintain a constant floor elevation than it is to follow the vertical variations. The resulting excavation will remain within the disposal envelope as specified on the drawing.



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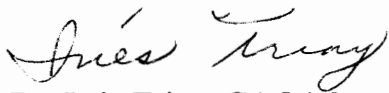
Mr. John Kieling

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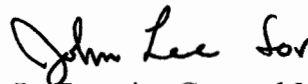
We are advising NMED of this operational change as a courtesy and to keep you informed of our ever-increasing knowledge of the geomechanical conditions present at WIPP. DOE and WID do not consider this change in operations a modification of permit conditions.

Should you have any questions, please contact Jody Plum at (505) 234-7462.

Sincerely,



Dr. Inés Triay, CAO Manager
U. S. Department of Energy



J. L. Epstein, General Manager
Westinghouse Waste Isolation Division

cc:

James P Bearzi, NMED
John E. Kieling, NMED

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