

*IMPORTANT NOTICE: The current official version of this document is available via the Sandia National Laboratories NWMP Online Documents web site. A printed copy of this document may not be the version currently in effect.*

## SANDIA NATIONAL LABORATORIES WASTE ISOLATION PILOT PLANT

### Analysis Plan for CRA MONPAR Investigation

**AP - 109**

**Task 1.3.5.2.1.3.**

**Effective Date: 09/03/03**

Authored by:	<u>Steve Wagner</u> Print Name	<u>Original signed by Steve Wagner</u> Signature	<u>9-2-03</u> Date
Reviewed by:	<u>Ross Kirkes</u> Print Name Technical Reviewer	<u>Original signed by Ross Kirkes</u> Signature	<u>9-02-03</u> Date
Reviewed by:	<u>Marty Mitchell</u> Print Name Quality Assurance Reviewer	<u>Original signed by Marty Mitchell</u> Signature	<u>3 Sept 03</u> Date
Approved by:	<u>David Kessel</u> Print Name Department Manager	<u>Original signed by David Kessel</u> Signature	<u>9/2/03</u> Date

## Table of Contents

<b>1 Introduction and Objectives .....</b>	<b>3</b>
1.1 Introduction .....	3
1.2 Objectives.....	3
<b>2 Approach .....</b>	<b>3</b>
2.1 Project Resources .....	4
2.2 Project Tasks and Milestones .....	4
<b>3 Software List .....</b>	<b>4</b>
<b>4 Tasks .....</b>	<b>4</b>
<b>5 Special Considerations .....</b>	<b>4</b>
<b>6 Applicable Procedures .....</b>	<b>4</b>

# **1 Introduction and Objectives**

## **1.1 Introduction**

This AP outlines the approach to reassess the monitoring parameter (MONPAR) analysis used in the Compliance Certification Application (CCA) to fulfill the regulatory requirement at 40 CFR 194.42. The MONPAR analysis was used to determine what monitoring parameters should be included in a monitoring program as required by the Environmental Protection Agency (EPA) requirements. Since the CCA, changes have occurred within the WIPP project that could potentially impact the conclusions in the original MONPAR analysis. This AP shall be used to assess the MONPAR conclusions to determine if the analysis continues to be adequate for the Compliance Recertification Application (CRA) or if it should be modified or reanalyzed.

## **1.2 Objectives**

The objective of this analysis plan is to determine the adequacy of the CCA MONPAR analysis for use in the CRA. If the assessment concludes that MONPAR is not adequate, the activities necessary to redefine meaningful monitoring parameters pursuant to 20 CFR 194.42 shall be performed under a separate analysis plan.

# **2 Approach**

The approach of this analysis plan is to determine which changes should be considered in the reassessment and then qualitatively determine the impact of these changes on the conclusions drawn in the MONPAR analysis. These changes include the following activities that have occurred since the CCA activities were completed:

- Monitoring Results
- Experimental Activities
- PA Changes – Methodology/Parameter/Implementation
- WIPP Operational Changes
- Proposed changes to activities and conditions approved by the EPA

A final report shall be generated to document the results of this assessment. The report shall list the changes assessed and systematically determine the impact (if any) these changes have on the conclusions of the original MONPAR analysis. The assessment shall focus on any impact on the original conclusions (parameters to be monitored) of the MONPAR analysis and shall be used to determine if the MONPAR analysis requires modification or reanalysis. The assessment will result in one of the following conclusions:

- Analysis is not impacted by changes and is adequate for the recertification application – original analysis conclusions are unchanged;
- Analysis is not significantly impacted by the changes – (document the affected areas of the analysis and significance justification) - original analysis conclusions are unchanged;

- Analysis is significantly impacted such that the original conclusions are likely to be different upon completion of a new monitoring assessment.

The results of the reassessment are considered a “compliance decision” and shall be documented in a final report meeting NP 9-1 requirements. Sources of error and uncertainty relating to this reassessment shall be noted in the reassessment report. Requirements for identification and control of sources of analysis error and uncertainty for a reanalysis shall be included in the analysis plan governing a new MONPAR assessment (if warranted).

## **2.1 Project Resources**

Not Applicable

## **2.2 Project Tasks and Milestones**

A list of changes to be used in the reassessment shall be developed by August 22, 2003. The reassessment shall be completed by August 31, 2003. A final report shall be completed by September 12, 2003. Should the result conclude the MONPAR analysis is not adequate for inclusion in the CRA, a new AP shall be generated to initiate and schedule the reanalysis of MONPAR.

## **3 Software List**

Not Applicable

## **4 Tasks**

A final report shall be used to document the conclusion of the MONPAR reassessment.

## **5 Special Considerations**

None

## **6 Applicable Procedures**

NP 6-1, Document Review Process  
NP 9-1, Analyses  
NP 17-1, Records

**NOTICE:** This document was prepared as an account of work sponsored by an agency of the United States Government. Neither the United States Government nor any agency thereof, nor any of their employees, nor any of their contractors, subcontractors, or their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness or any information, apparatus, product or process disclosed, or represents that its use would not infringe privately owned rights. Reference herein to any specific commercial product, process or service by trade name, trademark, manufacturer, or otherwise, does not necessarily constitute or imply its endorsement, recommendation, or favoring by the United States Government, any agency thereof or any of their contractors or subcontractors. The views and opinions expressed herein do not necessarily state or reflect those of the United States Government, any agency thereof or any of their contractors.

This document was authored by Sandia Corporation under Contract No. DE-AC04-94AL85000 with the United States Department of Energy. Parties are allowed to download copies at no cost for internal use within your organization only provided that any copies made are true and accurate. Copies must include a statement acknowledging Sandia Corporation's authorship of the subject matter.