

# **Perspective on Passive Institutional Controls at the Waste Isolation Pilot Plant**

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- DOE needed to have a design for passive institutional controls (marker system, records, etc) as part of the certification (license) application
- EPA wanted a reasonable expectation that any marker system to deter **inadvertent** intrusion would:
  - Endure
  - Be understood into the future
- EPA allowed for the possibility of credit for reducing drilling intrusions

## Main Issues

- Did not allow DOE to take credit for a reduction in drilling rate
- Had concerns that the granite blocks could be developed as planned
- Issues identified with use of international archives
- Identified a need to be flexible to allow for new technological developments

## **EPA Determination**

- DOE to develop final plan for passive institutional controls no later than the final recertification application
- DOE needs to have an implementation schedule
- Need to document that the granite pieces can be constructed as planned
- Document that archives and record centers will accept WIPP information

## Condition for PICs

- We have allowed DOE time to address new technological and sociological findings
  - Feasibility of marker construction
  - Long-term records
- We have urged DOE to participate in international institutional control efforts

## Ongoing Issues