

APPENDIX C

COMMENTS AND RESPONSES

This appendix contains the comments that were received during the 30-day public comment period on the draft EA (March 22 through April 22, 2002) and their responses. Comments were obtained during the public meeting held in Carlsbad, New Mexico, on April 16, 2002, as well as from letters and electronic mail messages. The comment entries are organized according to comment categories.

In compliance with the provisions of the National Environmental Policy Act and Council on Environmental Quality regulations, public comments on the draft EA were assessed individually and collectively. Some comments resulted in changes or modifications that have been incorporated into the final EA. Comments not requiring modifications to the EA resulted in a response to correct the commenter's misinterpretation, to clarify the scope of the EA, or to answer technical questions.

C.1 ACRSL LABORATORY

Comment Number C-02

Comment You did not state a cost for such a building. I am sure it is upwards of a million dollars or more.

Response The total budget for construction activities is estimated to be \$3,634,937. The total estimated costs for design and construction phases would be \$4.2 million spread over a 32-month period. Table 4-4 shows the budget for construction, and Table 4-5 shows the annual operating cost for the ACRSL.

Comment Number C-04

Comment The wastes sent to WIPP should already be tested, labeled and should conform to the specifications of types of wastes allowed.

Why should WIPP employees have to travel to Los Alamos? Isn't there reciprocity of info and research sharing? Another example of duplication.

Response The wastes sent to WIPP for disposal are tested and labeled, and meet WIPP waste acceptance criteria. The Proposed Action in this EA could improve some of the testing methodologies currently employed, but the overall requirements for WIPP waste would remain essentially unchanged.

Because LANL performs mostly weapons-related research, there is little information and research done at LANL that is useful to WIPP. WIPP funds and conducts WIPP-related activities at LANL, and WIPP employees need to travel to Los Alamos to oversee and conduct those activities.

Comment Number C-09

Comment The brief announcement provided by your office is hardly adequate for explaining why, when doing the environmental assessment experiments at Los Alamos has been going on for some time, there should be an entirely new facility in Carlsbad.

Response DOE is required to demonstrate compliance with standards for disposal of TRU waste in accordance with criteria codified in 40 CFR Part 194. In the past, WIPP-related chemical research activities have been performed at several different laboratories. Now, with the exception of LANL, WIPP has ended experiments at other sites. DOE has determined that it would be much more efficient and cost-effective to consolidate these activities in a local Carlsbad facility that does not present the difficulties inherent with the distances currently involved or the security requirements at laboratories that primarily perform weapons-related work.

Comment Number C-18

Comment One of the reasons for not refurbishing TA-48 at LANL is that of increased security. If the laboratory is built on the NMSU, Carlsbad campus, will there be a need for security beyond what now exists? If the laboratory does become an NRC Category III or II, there are NRC regulations for intense security. The same question arises if the laboratory is built and operated at the WIPP site.

Response One of the reasons for increased security at TA-48 has to do with weapons-related work, but this is not an issue at the proposed ACRSL because no such work would be conducted. The ACRSL would continue with the current level of security at the CEMRC. The CEMRC and the proposed ACRSL would both be governed by a strict, computer-based access system that would be controlled on a door-by-door basis. All doors would be locked-down, and access would only be granted to those who are trained and authorized. All ACRSL personnel would be trained for all hazards associated with the safety of the staff and the environment, and they would be issued a handbook titled *Carlsbad Environmental Monitoring and Research Center, New Mexico State University, Employee and Collaborator Handbook* (dated March 11, 2002), which contains a security plan for the site.

There is no plan to have the ACRSL become an NRC Class II or III.

Comment Number C-32

Comment Are there plans to begin plutonium experiments in the mobile facility? If so, the EA should also cover this facility.

Response The EA mentions the mobile facility (see Sections 1.1 and 2.1). If DOE decides to use the mobile facility for plutonium experiments, it would be permanently sited at the CEMRC and the facility would be equipped to meet all air quality, safety, and security requirements in the same manner as the rest of the ACRSL facilities. This information has been added to Section 2.1.

Comment Number C-33

Comment Page 2-2 indicates three levels of HEPA filtration. This level of filtration appears reasonable. However, the HEPA specifications should be listed.

Response DOE did not think it was necessary to include specifications for HEPA filters; therefore, no change was made to the EA. HEPA specifications require that the filters should remove 99 percent at 0.3 microns.

Comment Number C-34

Comment Will the glove box be vented through the HEPA filter into the room or be vented to the exhaust system, then through additional HEPA filtration and out of the building?

Response The glove box would be vented through the exhaust system and then through additional HEPA filtration and out of the building.

Comment Number C-35

Comment For any "high activity fume hood", will there be HEPA filtration on the hood and then additional HEPA filtration before discharge?

The parameters, such as maximum activity, chemical form (e.g., nitrate), and physical form (liquid/solvent), characterizing the "high activity fume hood" should be presented.

Response There would be HEPA filtration on the hood and additional HEPA filtration before discharge. The parameters characterizing radionuclides and chemicals planned for use in fume hood are presented in Chapter 4.

Comment Number C-36

Comment Will roughing (or pre-filters) be used ahead of the HEPA filters?

Response For the general room ventilation, a roughing filter will be included ahead of the HEPA filter.

Comment Number C-37

Comment Acid and other vapors can reduce efficiency of HEPA filters. An assessment of HEPA degradation over time, or conversely, checks on HEPA efficiencies would be appropriate. Bag in, bag out arrangements to change out filters should be considered for all reasonable instances.

Response HEPA filters would be monitored and replaced as appropriate. Bag in, bag out arrangements would be considered.

Comment Number C-38

Comment If perchloric acid is planned to be used in the chemical analyses (CEMRC Inventory indicates 12.5 liters of perchloric acid), then necessary precautions associated with the use of perchloric acid need to be factored into the design and operation of the laboratory, hoods, and glove boxes.

Response If perchloric acid were to be used, the necessary precautions would be factored into the design and operation of the laboratory, hoods, and glove boxes.

Comment Number C-39

Comment The creation and disposal of low-level radioactive waste is discussed on pages 2-5 and 3-17, but the possibility that TRU waste may also be derived is not addressed.

Response It is anticipated that current waste levels at the CEMRC would approximately double when the ACRSL is operational; however, no TRU waste would be generated. If that changes, LANL has a program to characterize and properly dispose of TRU waste that will be applied.

Comment Number C-41

Comment Page 4-6 indicates that Pu nitrate might be used in a glove box as a major source for samples. The nitrate solution would be divided to prepare smaller samples for various experiments or analyses. Practices should be developed to minimize any generation of micro drops and spillage resulting in glove box contamination. Are there any other special safety considerations that are necessary for Pu nitrate?

Response The use of plutonium nitrate in hoods is a common practice, is based on DOE standard practices and design, and follows special safety considerations. The ACRSL would follow the same standard practices and safety considerations.

Comment Number C-42

Comment The Actinide Chemistry and Repository Science Laboratory should have high/reasonable frequency of wipe surveys to assure detection of any contamination before spread and cross contamination. There is a low-level environmental laboratory at CEMRC and contamination should be avoided to assure that the operation of the low-level radioactivity laboratory is not compromised. In Table 4-1, the EA indicates that quarterly laboratory wipe surveys are planned. It would be prudent to relate the frequency of wipe tests to the use of Pu nitrate outside a glove box as follows:

<u>Activity</u>	<u>Frequency</u>
No use during the month	Monthly
Use during the week	At least weekly

A quarterly wipe test frequency is generally used for laboratories that use small-unsealed quantities (for tracer studies) or small sealed sources for calibration.

Response The frequency of wipe tests, which would follow the CEMRC Radiation Control Manual, would depend on the amount of activity. The wipe tests would be conducted at least monthly and maybe as often as weekly. These frequencies agree with those proposed in the comment.

Comment Number C-43

Comment Special steps should be taken to assure no cross-contamination of the low-level laboratory, such as use of sticky mats at ACRSL, separate ventilation systems (ventilation systems not ganged/or tied together), different housekeeping/custodial services, separation of staff, etc.

Response The special steps mentioned in the comment would be used by the ACRSL to avoid cross-contamination in the facility. The ACRSL wing would be completely separate, to include a separate ventilation system and infrastructure.

Comment Number C-44

Comment All potentially contaminated laboratory sinks drain into carboys. It should be assured that secondary containment of the required volume is used with the carboys and that carboys are not filled greater than 75% of volume.

Response Secondary containment would be used, and the carboys would not be filled to exceed more than 75 percent volume. Handling of potentially radioactive liquids from carboys beneath laboratory sinks is described in Section 4.2.1 and would be designed to meet all regulatory requirements.

C.2 AIR QUALITY

Comment Number C-28

Comment This proposal does not indicate if the ACRSL facility has submitted an application for an increase in volatile solvent and reagent emissions or currently has a permit on file with the Air Quality Bureau. A copy of the application or permit number should be included in the final assessment for review.

Response Should the project be approved, the CEMRC would obtain all necessary air permits. The plan to obtain an air quality permit if the proposed project is approved has been added to Sections 4.8.1 and 4.11.

Comment Number C-29

Comment The NMED currently does not assume regulatory oversight to facilities handling radionuclides. It is unclear whether the ACRSL facility will be included in the Memorandum of Understanding (MOU) between the DOE and EPA regulating radionuclides. The MOU should be included in the final environmental assessment.

Response The CEMRC is owned and operated by New Mexico State University, and the New Mexico Environment Department oversees that facility. Their oversight would continue if the ACRSL were built on the CEMRC site.

Comment Number C-30

Comment During construction activities, applicable local or county regulations requiring dust control should be taken to minimize the release of particulates during the proposed project. Areas disturbed by the construction activities within and adjacent to the project area should be reclaimed to the extent possible to avoid long-term problems with erosion and fugitive dust.

Response During construction and operation of the ACRSL facility, all applicable regulations would be followed. If the ACRSL were built at the CERMC, which is operated by NMSU, it would be a contractual requirement that all New Mexico regulatory requirements would be met.

Controls for dust would be used, as was the case during the construction of the CEMRC. Water, possibly containing surfactants, would be used to wet the exposed dirt surfaces to reduce dust emissions.

Comment Number C-31

Comment Any contractors supplying asphalt or cement for the project must have the appropriate current air quality permits.

Response During construction and operation of the ACRSL facility, all applicable regulations would be followed. If the ACRSL were built at the CERMC, which is operated by NMSU, it would be a contractual requirement that all New Mexico regulatory requirements would be met.

Comment Number C-47

Comment In the second paragraph of page 4-20, relating to toxic air emissions under the proposed action, Table 2 of Appendix A of the 1995 EA is cited. The paragraph goes on to state "A conservative projection would double the estimated total annual use and, therefore, potentially double the emission rates or concentrations cited in [the 1995 EA]. However, the projected increase... would not result in aggregate emission rates or concentrations that would require permitting under air quality regulations".

Referring to Table 2, page A-3, of the 1995 EA, the estimated emission rates for, among other things, hydrofluoric, sulfuric, nitric, and hydrochloric acids are listed and compared to the (then applicable) NMED Air Quality Control standards. Under the current regulations, issued February 18, 2002, apparently hydrofluoric and hydrochloric acids have been dropped from the air toxics list. Nevertheless, if you double the emission rates for nitric and sulfuric acids from Table 2 (0.3061 and 0.0798 lbs/hr, respectively), you get 0.6122 and 0.1596 lbs/hr, which are significantly greater than the current emission limits of 0.333 and 0.0667 lbs/hr (new section 20.2.72.502 of the regulations). The regulation (20.2.72.402 (B)) clearly states “A permit must be obtained from the Department by any person prior to the construction or modification of a new source which has total potential emissions of a toxic air pollutant into the ambient air that exceed the emission level in pounds per hour specified in 20.2.72.502 NMAC...”. Therefore, CEMRC should identify and make arrangements for all necessary permits.

Response Based on the new permitting requirements, the CEMRC would obtain all necessary air permits. The plan to obtain an air quality permit if the proposed project is approved has been added to Sections 4.8.1 and 4.11.

C.3 EA ANALYSIS

Comment Number C-15, C-26

Comment There was no mention of the tornado problem that exists in southeastern New Mexico.

Response It is recognized that natural events such as a tornado could happen, as indicated at the *Tornadoes by State* website (<http://www.tornadoproject.com/alltorns/nmtorn.htm>). However, rather than determining the probability of such an event, mechanical forces on the building, and other sophisticated analyses, the bounding release described in this section assumes that all radioactive materials are available for release regardless of the initiating event. The dispersal of plutonium would be over an extremely large area due to the high winds (100 to 200 miles per hour) associated with tornados. This would result in a much smaller exposure to any person than the bounding analysis conducted in this EA for a seismic incident. A text box has been added to the “Release” discussion in Section 4.2.1.1 to clarify this issue.

Comment Number C-22

Comment The Living Desert Museum is very near the NMSU CEMRC. Would the laboratory have any effect on the operations of the museum?

Response The Living Desert State Park is located within 0.8 kilometer (0.5 mile) of the CEMRC building. However, the analysis in Chapter 4, Environmental Impacts, determined that there would be no significant impacts as a result of the Proposed Action, regardless of proximity to the new laboratory.

Comment Number C-24

Comment Why was Lea County presented for the proposal of the laboratory being built and operated at WIPP? WIPP is in Eddy County and the majority of the employees at WIPP reside in Eddy County. We must point out that the statistics for Lea County vary greatly from the statistics for Lea County [*sic*] (Eddy County is much more prosperous).

Response WIPP is located in Eddy County but near the Lea County line; thus, both counties were considered to be part of the "region of influence" and were considered in the analysis.

C.4 EDITORIAL

Comment Number C-12, C-51

Comment Change Joel Webb's title to "director." He has been promoted.

Response The text has been changed in Chapter 5 and Appendix B in response to this comment.

Comment Number C-14

Comment Clarify that 2 curies is limit site-wide.

Response Chapters 2 and 4 of the EA have been revised to clarify that the 2-curie limit is site-wide.

Comment Number C-49

Comment At the top of page 2-3, the isotope Strontium-86 is mentioned. Strontium-86 is stable. Should this be Strontium-89.

Response The text in Section 2.1.1 has been corrected in response to this comment.

Comment Number C-50

Comment In the second paragraph of section 2.1.3, the Hazardous and Radioactive Materials Bureau is mentioned. The name has changed to the Radiation Protection Bureau.

Response The text in Section 2.1.3 has been corrected in response to this comment.

C.5 ENDORSEMENT

Comment Number C-13

Comment I'm all for it.

Response Thank you for your comment.

C.6 NEPA PROCESS

Comment Number C-05

Comment Please have this hearing in Santa Fe.

Response Recognizing that not every individual, organization, or agency could or would attend a public meeting, DOE invited comments on the Draft EA by mail, facsimile, and electronic mail. The public meetings were advertised in the Carlsbad Current-Argus on March 31, 2002. DOE believes that this approach provided an adequate opportunity for the interested public to comment on the Draft EA.

DOE is proposing to locate the ACRLS in Carlsbad; therefore, they felt the meeting should be held there. No organization or individual requested a meeting in Santa Fe in advance; however, DOE did receive two comments during the comment period that requested a meeting in Santa Fe. DOE evaluated these requests and decided that the level of interest evidenced by the two individuals did not warrant the expense of holding an additional meeting in Santa Fe.

Comment Number C-10

Comment It is impossible for citizens to travel to Carlsbad to hear the cost figures, the real rationale, and the position of LANL on this matter.

Response Recognizing that not every individual, organization, or agency could or would attend a public meeting, DOE invited comments on the Draft EA by mail, facsimile, and electronic mail. The public meetings were advertised in the Carlsbad Current-Argus on March 31, 2002. DOE believes that this approach provided an adequate opportunity for the interested public to comment on the Draft EA.

Comment Number C-27

Comment CBFO plans to conduct two public meetings on April 16, 2002 in Carlsbad, New Mexico; however, there is no planned public meeting in Santa Fe, as is the customary situation.

Response Recognizing that not every individual, organization, or agency could or would attend a public meeting, DOE invited comments on the Draft EA by mail, facsimile, and electronic mail. The public meetings were advertised in the Carlsbad Current-Argus on March 31, 2002. DOE believes that this approach provided an adequate opportunity for the interested public to comment on the Draft EA.

The public meetings were held in Carlsbad for three reasons:

1. DOE is proposing to locate the ACRSL in Carlsbad; therefore, they felt the meeting should be held there.
2. The meetings were scheduled in Carlsbad to accommodate officials from the New Mexico Environment Department who were in town for other business. The Department officials did, in fact, attend the Carlsbad meeting.
3. No organization or individual requested a meeting in Santa Fe in advance; however, DOE did receive two comments during the comment period that requested a meeting in Santa Fe. DOE evaluated these requests and decided that the level of interest evidenced by the two individuals did not warrant the expense of holding an additional meeting in Santa Fe.

C.7 OPPOSITION

Comment Number C-01

Comment I am opposed to the construction of a laboratory in which to test the nuclear waste which is sent to WIPP. This is just another example of government duplication of effort and wasting of big bucks. If the proposed lab is going to attract "world-class" scientists, are you planning on a satellite Los Alamos? I am absolutely opposed to such expansion.

Response Thank you for your comment.

As discussed in Section 1.1 of the EA, DOE has determined that it would be much more efficient and cost-effective to consolidate these activities in a local Carlsbad facility that does not present the difficulties inherent with the distances currently involved or the security requirements at laboratories that primarily perform weapons-related work.

Comment Number C-07

Comment I am not in favor of construction of an Actinide Chemistry and Repository Science Laboratory.

Response Thank you for your comment.

C.8 OTHER

Comment Number C-06

Comment The Mescalero Apache Tribe has determined that the proposed "Construction of Actinide Chemistry and Repository Science Laboratory adjacent to the CEMRC" WILL NOT AFFECT any objects, sites, or locations important to our culture or religion.

Response Thank you for your comment.

Comment Number C-23

Comment Would the City of Carlsbad Public Safety Department (emergency response, emergency medical capabilities, fire fighting capabilities, as well as the police department) be trained for any emergency situation that could arise for an accident at the NMSU campus?

Response Annual site orientation tours involving CEMRC staff, firefighters, and emergency responders enable these entities to become familiar with the site and discuss a plan of action in the event of an accident or emergency.

Comment Number C-25

Comment Could the results of such experiments lead to requests for permit modifications? For example, Magnesium oxide is currently the "stabilizing" agent for the integrity of the steel drums as they become encapsulated with brine and salt. One of the experiments is to study the effects of Magnesium oxide on the actinide reduction-oxidation process could result in the proposal to eliminate the stabilizing agent from the depository.

Response Some experiments could support requests for regulatory changes, including modifications to the EPA certification of the WIPP hazardous waste facility permit.

Comment Number C-40

Comment The 100% biological survey is discussed on page 3-5. This is apparently the same one done for the 1995 CEMRC EA. However, the study is not referenced in either EA.

Response The full results of the survey were reported in the CEMRC EA. Section 3.3.1 has been revised to include the citation to the CEMRC EA.

Comment Number C-48

Comment Chapter 5 states "NEPA regulations require that federal, state, and local agencies with jurisdiction or special expertise regarding environmental impacts be consulted and involved in the NEPA process. Agencies involved include those with authority to issue permits, licenses, and other regulatory approvals." In light of EEG's comments on air quality, it seems appropriate that the New Mexico Environment Department should have been contacted for both Air Quality and Radiation Protection issues. It would be helpful if a list were provided of all local, state, and federal permits required for the project.

Response The New Mexico Environment Department commented on the EA, both in writing and at a public meeting. Their comments have been responded to, and appropriate changes have been made to the document based on those comments.

C.9 RADIOLOGICAL IMPACTS

Comment Number C-45

Comment Page 4-9. It is not reasonable to assume the noninvolved worker dose is the same as the member of the public. The dose to the involved worker should also be calculated as is done in most EAs and SARs.

Response A dose calculation for the involved worker has been added to Section 4.2.1.1 of the Final EA.

Comment Number C-46

Comment On pages 4-8 to 4-10, the dose to a Maximum Exposed Individual (MEI) and a noninvolved worker is calculated. A value of 18 mrem is shown in Table 4-2 and on page 4-24. However, there is a $10(4)$ conversion error in the calculation. One Sv/Bq is $3.7 \times 10(12)$ rem/Ci (not $3.7 \times 10(8)$) because there are 100 rem/Sv, not 0.01 rem/Sv. This results in a calculated dose to the MEI of 184 rem! Obviously this is an unacceptable dose.

The assumption that 2 Ci of plutonium would be released is excessively conservative. As a comparison for the CH9 underground accident in the SAR, where 128 PE Ci are at risk, the amount released is estimated to be $3.15 \times 10(-3)$ Ci. However, conditions in the laboratory could be somewhat different than those in waste drums in the underground. It is possible that a millicurie quantity being used for an experiment in a glove box might have a significant portion released to the environment in respirable form. But, in typical situations where a curie sized source is being moved to a glove box, the respirable release would be expected to be less than 1%.

The assumption that releases would not be reduced by HEPA filtration is a conservative one but it is usually made because conditions could arise where the filters were inoperative or bypassed. The E/Q value of $6.5 \times 10(-4)$ s/m(3) at 100 m is reasonable (considering the other conservative assumptions), but a value two or three times greater than this could have been used for a short-term exposure.

The accident dose calculation to the MEI needs to be redone using the correct conversion factors and more reasonable release quantity.

Response Based on this comment, radiological impacts have been recalculated and changes have been made to Section 4.2.1.1, Radiological Impact.

C.10 WASTE GENERATION

Comment Number C-03

Comment You have to stop creating nuclear/radioactive wastes, focus on onsite decontamination (at the location where the waste was created.)

Response Onsite decontamination and the decision to stop creating nuclear/radioactive waste are outside of the scope of this EA.

Comment Number C-08

Comment We need to learn to stop depositing nuclear waste anywhere and to build, if necessary, labs to learn how to deconstruct the waste. Or, if waste is desirable to terrorists (NPR news January 2002), how to use it. But it must also be deconstructed, neutralized or otherwise cancelled.

Response DOE supports research that may eventually result in alternative treatments of waste. At this time, DOE is unaware of any proven physical or chemical process that would neutralize the waste. The relatively small quantities of radioactive material involved in the proposed project would make them poor targets for terrorism.

Comment Number C-11

Comment Disposing of nuclear waste is one of the most contentious and problematic areas of the nuclear arms program. It should have the highest priority and deserves the most careful attention to efficiency, safety, and parsimony. None of these basic questions is really addressed in your April 1 letter, and the reasons given are so feeble as to almost reach the insult level for citizens who see human needs in New Mexico being ignored while the nuclear establishment continues to grow.

Response The Proposed Action of this EA is to determine whether DOE should construct the ACRSL at the CEMRC in Carlsbad, New Mexico. Any decision to dispose of nuclear waste is outside the scope of this EA.

Comment Number C-16

Comment My concern is security requirements. Will local terrorists be able to be around?

Response Although the relatively small quantities of radioactive material would make the facility a poor target for terrorism, the ACRSL would continue with the current level of security at the CEMRC. The CEMRC and the proposed ACRSL would both be governed by a strict, computer-based access system that would be controlled on a door-by-door basis. Access would only be granted to those who are trained and authorized.

There is no plan to have the ACRSL become an NRC Category II or III.

Comment Number C-17

Comment Why are we allowing nuclear waste into our state? How can we be so naïve to think nuclear waste molecules are contained with no harm to the surrounding environment? Let us keep nuclear waste from being transported to our state.

Response Transportation of nuclear waste is outside the scope of this EA.

Comment Number C-19

Comment There is a strong possibility that the experiments will, indeed, exceed the two curie level, thus mandating an NRC Category assignment status. How would the waste management handle and dispose of the TRU waste that would be created? Would the laboratory be considered a WIPP site generator? Would the laboratory undergo an audit process for approval to dispose of TRU waste at WIPP? Would TRU pacts have to be mobilized to transport the waste to WIPP?

Response The ACRSL has no intent of exceeding the 2-curie level and thus requiring a change in their NRC Category. It is anticipated that current waste levels at the CEMRC would approximately double when the ACRSL is operational; however, no TRU waste would be generated. If that changes, LANL has a program to characterize and properly dispose of TRU waste that will be applied.

Comment Number C-20

Comment Many of the experiments will involve the use of possibly large quantities (of) concentrated Nitric acid, which is not only corrosive, but is also an oxidizer. Will the training of the technicians be sufficient enough to ensure safety for the technician, as well as the environment? Will the Nitric acid be treated on site? Currently, NMSU CEMRC is not permitted, as it is exempt. Will small or large generator status of hazardous wastes force the facility to become permitted? There is insufficient data in the assessment to provide quantities to answer this question. The same questions apply if WIPP were to become the host for the laboratory.

Response All ACRSL personnel would be trained for all hazards associated with the safety of the staff and the environment. Any collaborators would also have to complete similar training.

It is anticipated that the CEMRC and the ACRSL would maintain their exempt status.

Comment Number C-21

Comment Will biological (microbial) waste become contaminated, radioactively, and how will it be disposed of?

Response Based on further review, DOE has modified its proposal and will no longer consider experiments using microbes. Microbial activity experiments have been deleted from the discussions in Chapter 2 and Appendix A.

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