

Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

AUG 1 6 2004

Elizabeth Cotsworth, Director Office of Radiation and Indoor Air U. S. Environmental Protection Agency Washington D.C., 20460

Subject: Partial Response to Environmental Protection Agency (EPA) May 20, 2004 Letter on CRA

Dear Ms. Cotsworth:

In response to the EPA's letter of May 20, 2004, the U.S. Department of Energy's (DOE) is pleased to provide information that answers some of the questions included in the enclosure to that letter. DOE determined after review of the EPA May 20th letter that the response to many of the items noted required additional analysis or significant effort. In order to allow time for those additional analyses, while at the same time responding to the EPA's requests in a timely manner, DOE will respond in a phased approach. This is the second phase of the response.

The attached table identifies the expected time frame for answering the EPA questions. The first column of this table covers items addressed in the transmittal as summarized in Enclosure 1.

Enclosure 2 provides the reference for documents identified in Enclosure 1 and Enclosure 3 is the revised text to replace Appendix PA Attachment PAR of the CRA. All enclosures are provided on compact disk.

If you have any questions, please contact Russ Patterson of my staff at 505-234-7457.

Sincerely,

R. Paul Detwiler Acting Manager

Enclosure

cc: w/enclosure

B. Forinash, EPA

C. Byrum, EPA

T. Peake, EPA

R. Lee, EPA

cc: wo/enclosure

P. Shoemaker, SNL

N. Elkins, LANL

G. Basabilvazo, DOE

CBFO M&RC

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Table 1. Summary Schedule for DOE Responses to EPA's First CRA Information Requests

August September Submittal		
August	September Submittal	Othersteen
Submittal		Other Issues
G-1 Fluid Injection: Update screening decision on fluid injection near WIPP site	G-5 PA Computer Codes: Part 3 - Evaluate SANTOS for "accuracy"	G-4 MgO Emplacement Plan
G-5 PA Computer Codes: Parts 1 & 2 - Provide QA documentation for DRSPALL and for NUMBERS.	G-8-2 DRSPALL Parameter Study Needed: Sensitivity to Initial Stress, part 2 to G-8-1.	C-23-5 Assure 1.67 MgO safety factor is maintained and modify CRA text accordingly
G-6 Parameters and the Parameter Database: Provide rationale for status of 10 additional DRSPALL parameters with respect to the PA Parameter Database	C-23-10 PA Models and Computers Codes: Demonstrate that performance is not sensitive to container-to- container variability of waste	
G-6a Parameters and the Parameter Database: Identify PA control parameters that are		
not listed in the PAPD.		
G-7 Transmissivity Fields: Provide additional justification for the new modeling approach, including the low transmissivities predicted in the SE part of the site.		
G-8-1 DRSPALL Parameter Study Needed: Determine sensitivity to drilling damage zone thickness and to initial stress in the waste?		
G-9 Probability of Significant microbial degradation of CPR: Provide rationale for probability of CPR degradation. C-23-2 PA Models and	·	
Computers Codes: Provide documentation of the QA procedures used in the review process.		
C-23-4 PA Models and Computers Codes: Provide justification for difference between the predicted closures for Panel One and for Ops/Exp Areas in PA.		
C-23-8 PA Models and Computers Codes: Provide QA documentation for codes in the SCMS. (Related to G-6a) C-23-9 PA Models and		
Computers Codes: Assure "additional codes" are executed within the SCMS. Covered under C-23-8		