



Department of Energy  
Carlsbad Field Office  
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Carlsbad, New Mexico 88221

JUL 15 2004

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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.

The attached table identifies the expected time frame for answering the EPA questions. The first column of this table covers items addressed in this transmittal as summarized in Enclosure 1. The items in the second and third columns will be answered in letters to be provided in August and September. Enclosure 2 provides the reference for documents identified in Enclosure 1. Enclosure 3 contains the CRA Waste Inventory Data Base as requested in EPA comment G-3. Enclosure 4 contains the CRA References requested in comments R-1a and R-42-1.

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

0403744

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P. Shoemaker, SNL  
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G. Basabilvazo, DOE  
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Table 1 Summary Schedule for DOE Responses to EPA's First CRA Information Requests

July Submittal	August Submittal	September Submittal	Other Issues
<b>G-2 Inventory:</b> Provide inventory and impact estimates for CPR external to the waste containers.	<b>G-1 Fluid Injection:</b> Update screening decision on fluid injection near WIPP site	<b>G-5 PA Computer Codes:</b> Evaluate SANTOS for "accuracy"	<b>G-4 MgO Emplacement Plan</b>
<b>G-3 Waste Inventory Database:</b> Provide database used in developing the waste inventory estimates	<b>G-5 PA Computer Codes:</b> Provide QA documentation for DRSPALL and for NUMBERS.	<b>C-23-10 PA Models and Computers Codes:</b> Demonstrate that performance is not sensitive to container-to-container variability of waste	<b>C-23-5 Assure 1.67 MgO safety factor is maintained and modify CRA text accordingly</b>
<b>C-42-1 Monitoring Requirements:</b> Data appears to be missing on certain monitoring parameters.	<b>G-6 Parameters and the Parameter Database:</b> Provide rationale for status of 10 additional DRSPALL parameters with respect to the PA Parameter Database		
<b>C-42-2 Chapter 7 supplemental data:</b> Additional data are needed to support the assertion that monitoring data are within the expected ranges.	<b>G-6a Parameters and the Parameter Database:</b> Identify PA control parameters that are not listed in the PAPD.		
<b>C-42-3:</b> Copies of Appendix DATA QA documents are required.	<b>G-7 Transmissivity Fields:</b> Provide additional justification for the new modeling approach, including the low transmissivities predicted in the SE part of the site.		
<b>C-42-4:</b> Clarify file contents for Appendix DATA, Attachment F, in the CRA	<b>G-8-1 DRSPALL Parameter Study Needed:</b> Determine sensitivity to drilling damage zone thickness and to initial stress in the waste?		
<b>C-23-1 PA Models and Computers Codes:</b> Provide a table comparing results from CCA, PAVT and CRA	<b>G-8-2 DRSPALL Parameter Study Needed:</b> Sensitivity to Initial Stress, part 2 to G-8-1.		
<b>C-23-3 PA Models and Computers Codes:</b> Provide rationale for changing from SECOFL2D to MODFOLW-2000	<b>G-9 Probability of Significant microbial degradation of CPR:</b> Provide rationale for probability of CPR degradation.		
<b>C-23-6 PA Models and Computer Codes:</b>	<b>C-23-2 PA Models and Computers Codes:</b>		

<b>July Submittal</b>	<b>August Submittal</b>	<b>September Submittal</b>	<b>Other Issues</b>
Provide explanation for assumption that the DRZ does not reach MB138 is needed.	Provide documentation of the QA procedures used in the review process.		
<b>C-23-7 PA Models and Computers Codes:</b> Provide basis for sorptive capacity of the Dewey Lake	<b>C-23-4 PA Models and Computers Codes:</b> Provide justification for difference between the predicted closures for Panel One and for Ops/Exp Areas in PA.		
<b>R-1 Reference List :</b> Completed on 5/3/04	<b>C-23-8 PA Models and Computers Codes:</b> Provide QA documentation for codes in the SCMS. (Related to G-6a)		
<b>R-1a:</b> A specific reference is requested:	<b>C-23-9 PA Models and Computers Codes:</b> Assure "additional codes" are executed within the SCMS. Covered under C-23-8		
<b>R-FS-1:</b> Provide a copy of the Future States document			
<b>R-42-1:</b> Provide references (WIPP comment numbers 32-41):			