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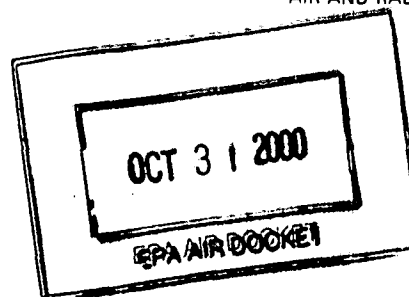
72) II-A3-21

Docket Number:

A-98-49

A-98-49
II-A3-21UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 1 2000

OFFICE OF
AIR AND RADIATION

Matthew Silva, Director
Environmental Evaluation Group
7007 Wyoming Boulevard, NE, Ste. F-2
Albuquerque, NM 87109

Dear Dr. Silva: *Matt*

In response to EEG's request of June 20 (Enclosure 1), I am sending our written responses to your comments on the Idaho National Engineering and Environmental Laboratory (INEEL) waste characterization documents that we docketed (Enclosure 2). We have responded only to comments numbered six and seven, as you requested. I have also enclosed a copy of our inspection report for inspection no. EPA-INEEL-4.00-8 (Enclosure 3). I will forward your letter to the Carlsbad Area Office and encourage the Department of Energy (DOE) to review your comments and recommendations. We appreciate your specificity about the issues to which we should respond, and we look forward to working closely with you during our site inspections and technical meetings with DOE.

Sincerely,

Mary

Mary U. Kruger, Director
Center for Federal Regulations

Enclosures

cc: Ines Triay, CAO
Sam Vega, CAO



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Enclosure 1: EEG letter to EPA, dated June 20, 2000



ENVIRONMENTAL EVALUATION GROUP

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June 20, 2000

Ms. Mary U. Kruger, Director
Center for Federal Regulations
U.S. Environmental Protection Agency
Office of Air and Radiation
401 M Street SW (6608J)
Washington, DC 20460

Dear Ms. Kruger:

Attached are comments on INEEL documents. Our tardiness is due, in large part, to a delay in obtaining the documents for review. Since no comments applicable to EPA concerns were found in the INEEL Quality Program Plan (PLN-182) or the QAPjP (PLN-190), only the comments for PLN-579, Program Plan for Certification of INEEL Contact-Handled Stored Transuranic Waste (Revision 0, effective 03/13/00) are included. Comments numbered 6 and 7 appear to be the only pertinent ones from the EPA viewpoint, and are the only ones that EEG believes the EPA need respond to.

As with other generator site document reviews, the EEG's comments would be more efficacious if addressed during the CAO's own review of generator site documents. The EEG will pursue changing the comment process in that direction, which may eventually relieve the EPA from responding to many of the EEG's comments. However, EEG will still use the 40 CFR 194 process to inform the EPA of unresolved concerns.

Sincerely,

Matthew Silva
Director

MS:BAW:js
Enclosure

cc: Dr. Inés Triay, DOE/CAO

Enclosure 2: Response to Comments in EEG's Letter of June 20, 2000

Response to Comment no. 6

We agree that the process for using NDA data not collected under an NQA-1 program would have to be described in the INEEL WAC or in a referenced procedure. To date, we have authorized INEEL to use only NDA data that were collected under an NQA-1 program. We confirmed INEEL's use of properly qualified NDA measurements during inspections EPA-INEEL-4.00-22 and EPA-INEEL-4.00-8 (see enclosed report). It is our understanding that all containers will be assayed under the approved NQA-1 program. If INEEL proposes to use NDA data that was not collected under an NQA-1 program, the data would have to be qualified under a process reviewed and approved by EPA.

Response to Comment no. 7

We agree that the WIPP Waste Acceptance Criteria call for a determination of the MDC for the passive mode. The calculation of the MDC for passive measurements is beneficial because it demonstrates that INEEL can measure concentrations in the range of values for which they propose to use the passive mode (the MDC is less than the lower end of the range of concentrations to be measured). We will forward your comment to the Carlsbad Area Office for their consideration.