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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 17, 2001

Dr. Inés Triay, Manager
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Department of Energy
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P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: COMMENTS ON DIGITAL RADIOGRAPHY/COMPUTER TOMOGRAPHY PERMIT
MODIFICATION REQUEST, JANUARY 23, 2001
WIPP HAZARDOUS WASTE FACILITY PERMIT
EPA I.D. NUMBER NM4890139088**

Dear Dr. Triay and Mr. Lee:

On January 24, 2001, the New Mexico Environment Department (NMED) received a letter from DOE and Westinghouse TRU Solutions (the Permittees) dated January 23, 2001, transmitting a Class 2 permit modification request seeking approval to use digital radiography and computed tomography (DR/CT) in lieu of visual examination (VE) as a quality control check on radiography under the facility's Hazardous Waste Permit. The Permittees provided public notice of the permit modification request on January 31, 2001, in compliance with 20.4.1.900 NMAC (incorporating 40 CFR §270.42(b)(2)). At the conclusion of the public comment period on April 2, 2001, NMED had received 31 pages of comments from 11 commentors.

On April 23, 2001, the Permittees withdrew this Class 2 permit modification request in an undated letter faxed to NMED's Hazardous Waste Bureau. At the time of the withdrawal, NMED was developing a letter of denial in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.42(b)(6)(i)(B)). For the Permittees' benefit, attached are NMED's comments on the modification request that would have formed the basis for the department's denial of the request if the Permittees had not withdrawn it.

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In the withdrawal letter, the Permittees stated, "... withdrawing the DR/CT request will allow DOE to address the technical comments raised during the public comment period on the DR/CT modification request." Any future submittal by the Permittees should, at a minimum, address the deficiencies identified in our comments and, as appropriate, public comment.

The withdrawal letter did not indicate when if ever the Permittees intend to submit a revised DR/CT permit modification request. Nevertheless, NMED believes it would be prudent for the Permittees to consider how this proposed modification might be effectively combined with other proposed and potentially interrelated modifications to result in a single Class 3 permit modification request addressing broad issues with far-reaching implications for the facility (see Comment No. 1). This approach would enhance public understanding and participation by effectively presenting a cogent vision of the Permittees' strategy for modifying the permit to, among other things, better align it with the current National TRU Program business plan.

Finally, NMED continues to strongly urge the Permittees to take full advantage of the public comment period for any future modification request. Specifically, the Permittees should listen carefully and respond, as appropriate, to issues raised at public meetings. The Permittees should also seriously consider additional meetings with groups who consistently submit written comments on proposed modifications. To do so would promote more informed public comment and assist in the decision-making process. NMED encourages the Permittees to use this process to submit written comments that support their modification requests and address public concerns raised at public meetings.

If you have any questions regarding this matter, please contact Steve Zappe of my staff at (505) 827-1557.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

Attachment

cc: Paul Ritzma, NMED
Greg Lewis, NMED
John Kieling, NMED HWB
~~██████████ NMED HWB~~
Susan McMichael, NMED OGC

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David Neleigh, EPA Region 6
Mary Kruger, EPA ORIA
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File: Red WIPP '01

TECHNICAL ADEQUACY COMMENTS
JANUARY 23, 2001 CLASS 2 PERMIT MODIFICATION REQUEST
DIGITAL RADIOGRAPHY/COMPUTED TOMOGRAPHY (DR/CT)

1. The permit modification request was submitted as a Class 2 permit modification because the Permittees believed the request fell under 40 CFR 270.42, Appendix I, B.2.b, "other changes" to analytical quality assurance/control plans. However, the public has correctly pointed out that the proposed modification is actually a very complex change to the overall characterization program with far-reaching implications beyond quality control, and there is considerable public concern regarding the proposed modification. Additionally, the public has pointed out that significant questions remain regarding elements of the proposed modification, specifically those dealing with an actual demonstration that the DR/CT can serve as a substitute for visual examination (VE). Further, if NMED were to take on the burden of modifying the permit modification request to address all concerns, NMED would: 1) not have all information necessary to make said modifications, and 2) the level of changes required would fall outside of the scope intended for Class 2 modifications to be approved "with changes."
2. The permit modification request states that the proposed change "represents a change to the quality assurance/control plan of the Hazardous Waste Facility Permit" by modifying the requirement that radiography be checked using VE, allowing DR/CT in place of VE. The modification request, however, is not entirely clear on the intended use of DR/CT. Apparently, the Permittees intended to allow replacement of real time radiography (RTR) with DR/CT (which is currently allowed in the permit), and at the same time allow the replacement of VE of DR/CT with a second examination of DR/CT records. However, the implication also is that site RTR could also be checked by DR/CT rather than VE. The Permittees should clearly present their intended use of DR/CT.
3. The permit modification request advocates the use of DR/CT in place of VE, but provides no direct evidence (including statistical analysis) that DR/CT and VE are interchangeable for this purpose. Apparently, five waste containers (of the approximately 850,000 55-gallon drum capacity at WIPP) and three surrogate drums have been examined using both DR/CT and VE, but many of the written public comments doubted that eight containers could possibly be sufficient to demonstrate this interchangeability. In defense to these objections, the Permittees stated at the public meeting in Santa Fe that an additional twenty drums were currently undergoing DR/CT at Argonne National Laboratory East and that the results from the analysis would be submitted prior to the close of the public comment period. However, the Permittees submitted no additional information, resulting in a technically deficient modification request. The Permittees must perform a statistical analysis to determine the appropriate number of containers that must be subject to both DR/CT and VE to demonstrate comparability of the two systems, if the project that examined the five waste containers does not adequately address these issues (see Comment No. 4, below). Without this analysis and subsequent comparison and

assessment, replacement of VE with DR/CT is not adequately supported. Additionally, this analysis must consider the following to ensure that a sufficient number of containers are examined to demonstrate that the use of DR/CT can be substituted for VE as proposed:

- Analysis must consider the total drum population and waste characteristics on a facility-wide basis
 - Analysis need not be on a Waste Matrix Code basis, but should consider waste groupings that are more detailed than by Summary Waste Category Group (SWCG)
 - Analysis should consider whether a site-by-site assessment is appropriate, as suggested by public comment (i.e., one statistically appropriate batch per SWCG per site)
4. The study involving the five DOE generated and three surrogate drums was performed as part of a Rapid Commercialization Initiative (RCI) in which the State of New Mexico was not involved. Although the application of these results to the proposed modification are interesting, they are anecdotal and cannot be considered without a thorough understanding of the RCI study to determine if it was sufficiently rigorous and is applicable to the modification. At a minimum, the Permittees should have provided a copy of the final report of the RCI study in support of the permit modification request. Examples of additional information that should have been provided include but are not limited to:
- The Permittees must indicate the objectives of the RCI study and compare those objectives to the primary objective of the proposed modification, namely to determine if DR/CT is an adequate substitution for VE for confirmation of radiography as applied in the permit. Applications of results from a study are valid only if the conditions and variables of the study are appropriate for the situation being considered. There does not appear to be any indication whether identification of material parameter weights or prohibited items were included as parameters in the RCI study. The Permittees must clarify how all of the elements constituting potential miscertifications under the current permit were adequately addressed in the RCI study.
 - The permit modification request did not provide the statistical rationale for the number of samples that were evaluated in the RCI study (see Comment No. 3, above). In addition, the Permittees did not define how the samples were evaluated. The Permittees must identify the acceptance criteria used in the study and indicate how these criteria were quantified for statistical evaluation. The Permittees must also provide sufficient detail regarding any statistical tests performed to verify the adequacy of the DR/CT process.

- The Permittees must justify the sample size of the RCI study. In comparison to the overall population of drums slated for disposal at the Permittees' facility as well as the potentially large number of variable waste streams that will be encountered, the study sample size does not appear to be of appropriate significance to adequately assess the comparability of the DR/CT system to the VE process.
 - The permit modification did not indicate whether the drums were randomly selected to represent one or all of the waste streams and how this randomness was achieved. Also, three of the drums used in the study were surrogate drums, which were likely generated for purposes of the demonstration and could not be considered to be randomly selected. The Permittees must clearly demonstrate that the samples were randomly selected if the results of the RCI study are considered relevant to the large population of waste drums in the DOE complex that are to be characterized for disposal at the Permittees' facility.
 - The permit modification did not indicate how the samples in the RCI study represented the entire population of drums in the complex. The drum population within the DOE complex would be more accurately represented using a stratified sampling scheme in which the wastes were logically grouped to fully test the capabilities of the DR/CT system. In order to substantiate the statement that "*the requirements for performing QC of radiography can be met without VE when using DR/CT*", the Permittees would need to identify all of the possible matrices as well as prohibited items that could be encountered, and indicate how the drums in the test study were representative of each particular drum population.
5. An intended purpose of VE is to check the accuracy and precision of radiography systems using actual examination of waste. The replacement of VE with DR/CT does not allow this independent analysis; rather, the DR/CT results are checked against their own results without even the benefit of re-examining containers using the same radiography methods (which commentators such as EEG believe more accurately reflect precision measurements). This proposal brings to question whether the true intent of VE has been fulfilled with respect to "checking" radiography if DR/CT as a quality control (QC) method is approved. It is possible that errors made during DR/CT examination would only be propagated by further "QC" of DR/CT using the same drum measurement or measurement system. Additionally, DR/CT as a replacement for VE does not capture all observations that can be made using VE, including identification of writing on waste materials, etc.
 6. The permit modification request does not specify training associated with DR/CT. Clearly, general radiography training must still be performed, but the Permittees should also

consider whether special VE training for DR/CT operators should occur since DR/CT is to replace VE. Additionally, specific training with respect to the DR/CT system and program not currently included in the permit should also be evaluated. The Permittees should revisit these elements to ensure that the current permit training requirements are sufficiently detailed to address any unique requirements of DR/CT.

7. The permit modification request removes the requirement for independent radiography replicate scans, independent radiography replicate observations, and VE for drums undergoing DR/CT. Removal of these requirements is justified by stating that advancements in radiography (i.e., DR/CT) show that “the requirements for performing QC of radiography can be met without VE when using DR/CT... using independent interpretations of the DR/CT scan data collected for a the container as a QC check in lieu of using VE as a QC check.” While DR/CT technology appears quite promising, the Permittees have failed to demonstrate that the systems – regardless of how advanced they might be – can actually replace VE of waste (see Comments 3 and 4, above). Also, public commentors pointed out that the Permittees proposed to use replicate scans and independent observations as the radiography QC method, but NMED did not accept this approach alone when developing the original permit as the method by which radiography confirmation is performed; VE was also required. As written, it appears that the Permittees are proposing to use an approach to QC radiography that was not accepted by NMED during the public hearing in 1999 to perform radiography QC. Additionally, the role of the DR/CT “expert” performing independent review and observation of DR/CT information is unclear with respect to what this individual exactly shall examine (i.e., videotape of the initial observation or a complete review of the digital audio file).
8. The permit modification request did not provide detailed technical information concerning system operations, calibration, and *system limitations* that are required to truly and completely assess DR/CT (particularly CT) use. While web site links are provided, the information at these links is more advertisement in nature (the links are generally to vendor sites). Web site links by themselves cannot constitute documentation in the administrative record to support a final determination by NMED on the permit modification request. Direct applicability and non-applicability of systems to WIPP waste cannot be gleaned, nor can specific operating parameters, equipment requirements, etc., applicable to WIPP waste characterization be obtained, from this information provided. At a minimum, overall system information should be included to ensure that the basic DR/CT systems proposed for use meet baseline criteria.
9. Clarify why DR/CT independent review and observations of two randomly selected containers/batch (or day) was determined to be equivalent to the independent replicate scan, independent observation requirements, and VE requirements currently in the permit for radiography. Although not discussed thoroughly in the permit modification (except

through a footnote) it is assumed that the two per day would be used in some fashion to fulfill the miscertification evaluation requirements in the permit. However, the specific details concerning how the two-sample requirement would meet the random sample selection requirements of the miscertification rate calculation should be presented, including a permit clause requiring the sampling rate to increase if warranted by miscertification calculations.

10. The permit modification request proposes to replace the relative percent difference (**RPD**) measurement for precision with DR/CT measurements, as well as calculation of miscertification rates using DR/CT review of the statistically selected number of containers. However, the permit as currently written clearly requires comparison of a measurement system (radiography) and actual waste observation (VE) in both instances. Replacement of the direct observation piece with a second indirect observation (e.g., repeat examination of the measurement records) appears counter to the intent of the permit, particularly since DR/CT has not yet been demonstrated to be an acceptable VE replacement (i.e., the Permittees provided no DR/CT and VE comparisons, as they indicated they would during the public meeting held in Santa Fe). The need to reduce worker exposure is agreeably an important element to consider with respect to use of DR/CT as QC of radiography, but the actual number of drums requiring VE as per permit requirements should be discussed to present a complete picture of the current VE situation:

- The permit requires sites initially to visually examine 50 containers from each of their SWCGs, but experience has shown that the original groupings by SWCG can include several thousand containers; therefore, in reality, the Permittees are typically required to examine a very small percentage of SWCG containers (in some cases only about 1% of a SWCG). From this, sites establish miscertification rates (that are typically 0-1%), which subsequently result in VE of an additional 15 drums that can ultimately apply to **all** remaining containers with that SWCG. In short, NMED has observed on audits that sites will examine less than about 100 containers using VE, even when these sites have thousands upon thousands of containers that they intend to ship to WIPP. This small number of containers is also used to calculate RPD (where no additional containers are opened to determine this value). While 100 or less containers required to undergo VE may be 100 containers too many to the Permittees, *in practice* the permit makes every effort to limit the amount of VE without sacrificing actual waste observation that is clearly important to the public.
- Additionally, the Permittees have provided no evidence or information regarding exposure during VE to support their exposure assertions, and one must question the financial advantages of using existing VE systems to examine what is really a very

small number of containers, when compared to initiating an entirely new radiography system.

The Permittees should have considered these questions more thoroughly when preparing the permit modification request, and should have included more supporting information and discussion in the request rather than a brief statement of information and references to web sites that include little information other than basic technological information and advertising.

11. While a Performance Evaluation Program (PEP) is probably useful, particularly as part of site training activities or as an analogous process to the Performance Demonstration Program (PDP) program, it does not involve actual waste analysis. Additionally, the PEP does not specifically take into consideration system limitations or other problematic waste forms, nor does it take into account other requirements (layers of confinement) associated with other proposed permit modification requests by the Permittees. It is also curious that a PEP is only now being proposed; for years during the development of the disposal phase permit application, the Permittees claimed that the PDP program could not be applied to radiography, yet the proposed PEP and ongoing PDP programs/purposes for other activities are quite similar. Successful completion of the PDP program for other characterization activities such as headspace gas sampling and solid sampling is mandated in the permit (although specifics of the programs are not included as requirements), and inclusion of the PEP in a similar vein would be useful. However, implementation of a PEP *in place of* other QA requirements is not appropriate; this is more of a system check with respect to training and system operation, and the PDP has *never* been proposed as an alternative to any other system QC activities for the related activities. Additionally, the Permittees had previously claimed that the PDP would be useless for radiography because the system could not be “demonstrated” like other typical data collection systems because it is more “subjective (i.e., it involves human interpretation, error, training, etc.). While the middle letter of the acronym PEP has been changed to “Evaluation”, the Permittees should have included more information about the program, including why the program is now an acceptable QC substitution when, in the past, similar programs have been rejected by the Permittees with respect to radiography.

12. Table 2 raises questions about several elements of the DR/CT. For example:

- Technical information pertaining to unit capabilities was not included in the modification request, and is not adequately addressed at the cited web sites. For example, the Permittees have indicated that the system may have limitations with respect to some aspects of physical form, but these limitations are not identified, nor are limitations with respect to lead liners, etc., presented in the permit modification

request other than to say that “operators using DR/CT have demonstrated the ability to see through lead lined drums.”

- Results of the four audits by the Permittees apparently performed to address DR/CT were not included in the permit modification request. Additionally, the actual data for the three surrogate and five actual drums that underwent VE and DR/CT could not be gleaned from the web sites; specific, detailed drum data should have been included in the permit modification request (NMED assumes that VE was used to demonstrate that DR/CT has been “shown to be sufficient to meet all accuracy requirements for ... content codes and matrices under the RCI program” – see Comment No. 4). Also, the permit modification does not fully address the RCI program and its applicability to the WAP, as it does not include actual program results with respect to drums examined, problems encountered, comments by EPA, etc. Without detailed information, it is difficult to agree with the applicability of program results. For example, the permit modification request should address how WAP requirements for actual waste material parameter measurement comparisons based on VE/RTR are truly met through the DR/CT comparison when the DR/CT includes no actual, direct measurement of said parameters.
- How does the DR/CT operator distinguish between materials of different densities? Are density tables or other means used? How does the DR/CT operator assign material identifications when the densities of parameters are similar? Have studies been performed which show actual vs. estimated densities for various materials to ensure accurate assignments?
- Clarify which web site referenced in “Note 4” shows DR/CT capabilities to see through lead lined drums specific to WIPP, pipe overpacks, and other opaque items. Also clarify whether there are any limitations associated with said measurements. See also Comment No. 8.
- Clarify whether the intended recording media for DR/CT includes both audio and visual documentation of images observed and interpretations rendered; currently, radiographic and VE processes examined thus far at sites include both. Also clarify whether the digital record for DR/CT interpretation consists of synchronized video/audio data depicting the actual interpretation event, or only an audio track. Is proprietary software required to view the digital data or play back the interpretation?
- DR/CT is apparently capable of seeing through layers of confinement that VE experts are allowed to otherwise use “expert judgment” to determine when opening of bags with layers is not required. However, this does not mean that layers of confinement

cannot be determined using VE (it certainly can). Also, it appears that a certain level of detail derived from VE will always be lost using DR/CT (i.e., the ability to handle and directly weigh material), and this should be more fully addressed by the Permittees.

13. The permit modification request states that the amount of TRU mixed waste generated through VE is reduced using DR/CT. The permit modification request should have included specifically how many “new drums” of waste are generated during the VE process when compared, for example, to waste repackaging. Also, while it is true that VE can result in waste originally packaged in a single container being placed in one or more containers, it also allows the opportunity to remove prohibited items, etc., from the containers, when identified. NMED assumes that if DR/CT noted a container with a prohibited item or other issues/problems, the container be segregated for VE and would ultimately result in additional waste packages being generated. More information should have been included in the permit modification request with respect to “additional waste generation.”
14. The permit modification request asserts that exposure danger occurs during glove box VE activities, but does not indicate the incidents of torn gloves, etc., resulting from general glovebox operations that may have nothing to do with VE. Note that public comment has also questioned this aspect, indicating that the majority of ORPS-reported glovebox exposure incidents occurred while NOT performing VE activities. Also note that VE activities may or may not occur in glove boxes (e.g., Rocky Flats performs VE in an airlock). Further, public commentators pointed out that exposure to radiation may also occur via use of radiography equipment, and an ORPS report for Los Alamos (1998) reported an incident of exposure related to radiography.
15. Module II. The Permittees wish to modify the permit to remove mention of VE in favor of a more general “QC of radiography” statement, but the permit would have been better modified to retain VE-related language and to add the statement “QC of radiography using DR/CT” since VE is (apparently) still a radiography check option. In fact, the entire permit modification request should be revisited to ensure that the DR/CT QC of radiography is clearly an option rather than a mandate, since VE is still apparently allowed, in the permit modification request, as a check on radiography.
16. Attachment B-1c. Removal of the word “records” could be construed to restrict auditors to examining only the “paper trail”, even though auditors very frequently examine VE and RTR tapes (i.e., records) without being prompted to do so through data form discrepancies. It is also unclear whether the modification removing review of radiography tapes would dilute the requirement that on-site personnel review actual tapes (not just paper copies of data) with respect to radiography.

17. Attachment B-3c. The permit modification implies that the results of RTR could be confirmed using DR/CT, while other portions of the permit imply that QC by DR/CT would occur only when drums are initially radiographed using this process. It is assumed that the later situation is what the Permittees intended, but care should be taken when making modifications, as the language implies that VE can no longer be used.
18. Attachment B-3d(2). The proposed modification states that drums opened for sampling can be used to fulfill the DR/CT QC requirements, but it is unclear whether the use of different QC methods to confirm the same radiography technique is appropriate, particularly when calculating RPD, miscertification rate, etc. The Permittees must examine all implications of permit language change requests, because sites and the Permittees sometimes tend to “read between the lines” to glean interpretations not shared or approved by NMED. Similarly, the initial portions of this proposed modification, while appearing to be sufficient on first glance, could also be interpreted to mean that elements of the permit applicable to statistical sample selections could be interpreted differently than intended by the Permit.
19. Attachment B-4a(1). Addition of the parenthetical phrase “applies only to sites that use VE” is unnecessary, and removes the requirement that VE would also be used to confirm AK; VE performed in lieu of radiography is certainly performed to verify AK, and VE techniques certainly verify AK through the repackaging process.
20. Table B-6. The modification should have added language with respect to DR/CT rather than remove language pertinent to the characterization process. It is unclear from examination of the permit what change is being proposed, since the language shown in ~~strikeout~~ does not exist in the permit.
21. Attachment B1-3a. The second paragraph of this permit modification appears to imply that the digital systems would allow the use of “alterable” media with respect to digital records. Careful sentence construction would avoid this type of ambiguity. On the other hand, if digital records are alterable, this needs to be clearly stated.
22. Attachment B1-3b(3) and B1-3b(3)(iii). The permit modification request proposes the use of the PEP as a “QC on DR/CT”. However, this system does not use actual waste containers generated at the facility, requires much less “checking” than proposed DR/CT or VE checks, and would do nothing to actually verify contents of real drums already radiographed. It is also unclear how this process would be used to fulfill RPD and miscertification rate calculation requirements. The PEP more similarly resembles the PDP programs, which basically “test” how well systems operate, but by no means are used as a QC substitution for actual data collection. It is also unclear whether the training

requirements of the DR/CT operations would include evaluation of the test drum as specified for radiography and VE, or if the site PEP program was proposed as a replacement for the test drum portion of operator training and evaluation. The proposed PEP drum was only required to contain a minimum of six items from the list of twelve test items. However, there were no specifications that all of the items must at some point must be included in a PEP drum and at what minimum frequency each test item must appear in a drum. If the PEP is to be used in lieu of the training drums specified in the current permit, the Permittees must demonstrate how the proposed configurations of the PEP drums provide for equivalent evaluation of operator proficiency.

23. Attachment B3-3b(3)(i). Why was the sentence “Visual examination as specified in this section may be used in lieu of radiography” added, when the paragraph continues on to specifically address VE as confirmation of radiography? It is assumed that this is added to provide general guidance to sites that the process described therein can be used for VE other than radiographic confirmation, but the insertion of this statement implies that the full use of VE processes is not well presented. Please clarify if this was intended.
24. Attachment B3-3b(3)(ii). The Permittees do not propose re-performing DR/CT as part of the QC process, presumably because the process allows sufficient flexibility with respect to observation by the independent review that duplication of the measurement is unnecessary. However, this assertion has not been adequately demonstrated or addressed in the permit modification request, or at referenced web sites. It is also unclear how “standardized” training standards for the “industry” shall be implemented, when the web sites indicate that this technology has uses well beyond that proposed in the permit modification. That is, training specific to use of the equipment with respect to WAP analysis and the information that must be obtained should be specified; the Permittees should also consider whether training beyond that presented in the current WAP should be implemented. Additionally, the training and requirements specific to the DR/CT personnel should include those required of a VE expert, since the technique is apparently intended to replace VE and is purported to be basically equivalent to VE.

The modification goes on to discuss compilation of data summary reports after project level reviews, etc., but the discussion is disjointed and inappropriately placed (data validation is addressed in B3-10). Further, the modification goes on to “justify” training requirements; this information should have been placed in the explanation of the permit modification, not in the body of the permit because this language is unenforceable. Additionally, the Permittees misinterpreted NMED’s intent with respect to training requirements. NMED did not intend for radiography personnel to be trained to “industry standards”, implying that standards for personnel who examine welds would be sufficient for WIPP radiography operators. Rather, NMED intended that all personnel examining tapes or those reviewing tapes be trained to the same standards, so that those reviewing

tapes would be sufficiently prepared to interpret and understand information they observe, (e.g., identifying prohibited items). The Permittees' interpretation regarding training is incorrect.

26. Attachment B2-1. Because the permit modification request is somewhat confusing with respect to what encompasses "QC of radiography", Attachment B2-1 should reference previous sections which define this, or modifications to the section should have specified that this includes both VE and DR/CT (and, apparently, that DR/CT applies only when the original radiography is accomplished through DR/CT if, indeed, this is the case).
27. Equation B2-3. The modification refers to an Equation B2-3.e, which does not exist.
28. Attachment B3-4. The sentence removed in the permit a modification request still applies when VE is used to check radiography, and should have been retained. Also clarify why the reference to radiography accuracy was removed.
29. Table B3-11. Table B3-11 includes batch data report contents that are included in the July 21, 2000 Class 1 permit modification; applicability of this entire table is of question because NMED is preparing to issue a final agency determination regarding this modification. Further, items on this table pertinent to DR/CT QC (i.e., no imaging checks) require justification.

Note that NMED has provided no comments on the B6 checklist, as the B6 must be modified to reflect responses to the comments listed above.