



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

ENTERED

MAY 13 2002

OFFICE OF
AIR AND RADIATION

Dr. Inés Triay, Manager
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221-3090



Dear Dr. Triay:

The Environmental Protection Agency (EPA) has reviewed the Department of Energy's (DOE's) response to the inspection finding of non-compliance with Section 13 of NQA-3, the handling and storage of borehole cores. With this letter, EPA accepts DOE's proposal for resolving the program deficiencies relating to borehole handling and storage. DOE proposes to:

- 1) Inventory the existing cores;
- 2) Purchase suitable racks to store and retrieve existing cores;
- 3) Evaluate the current condition of the cores;
- 4) Ensure adequate storage, preservation and disposition of current and future cores;
and
- 5) Update procedures, including intended use, retention schedule, and details of required storage conditions.

Finally, DOE will revise internal policy to reflect these changes.

EPA will conduct an inspection, within 120 days of this letter, to ensure that these changes are being appropriately implemented. DOE shall submit a report to EPA on the inventory and condition of the existing cores as soon as possible.

Because of the current handling and storage conditions, the existing borehole cores can now only be used as a geological record and for visual reference. These cores cannot be used to gather detailed rock characteristics, such a porosity or permeability measurements, as was originally committed to in the Compliance Certification Application (CCA). Because of this loss

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of potentially significant data and information, EPA expects DOE to be able to collect new core data and information, if necessary.

Thank you for responding to this important finding. If you have any questions or concerns regarding EPA's conclusions, please contact me or have your staff contact Chuck Byrum at (214) 665-7555.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Marcinowski". The signature is fluid and cursive, with a large initial "F" and "M".

Frank Marcinowski, Director
Radiation Protection Division

cc: Matthew Silva, EEG
Steve Zappe, NMED