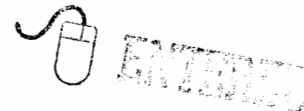




**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221



Mr. Frank Marcinowski, Director  
Office of Radiation and Indoor Air  
U.S. Environmental Protection Agency  
401 M. Street, S. W.  
Washington, DC 20460

DEC 2002

Dear Mr. Marcinowski:

As you are aware, the Carlsbad Field Office (CBFO) of the Department of Energy (DOE) from time to time considers allowing tests, demonstrations and/or experiments at the Waste Isolation Pilot Plant (WIPP) that are not directly related to the disposal of TRU waste. These experiments/demonstrations are evaluated for their potential impacts as part of the comprehensive WIPP review process, which is the standard approach to evaluate all planned changes in activities or conditions prior to allowing them to be implemented. A subset of these activities clearly does not impact the mission or operations for which the Environmental Protection Agency (EPA) has certified the WIPP. Therefore, the purpose of this correspondence is to request EPA approval for the DOE to proceed with this subset of activities as they arise and notify the EPA in the Annual Change Report. Where proposed activities involve changes that are outside the restrictive conditions described below or if the demonstrations/tests will be questionable, the DOE would continue to seek specific authorization from the EPA prior to allowing them to proceed.

For a proposed activity to be implemented, it would be required to meet the following criteria:

- No ventilation change
- No additional hazardous substances or new hazards
- No change in facility footprint (no new mining)
- No modification to waste disposal processes or impact to waste disposal operations
- Removal of all activity specific hardware and equipment upon completion of the activity

The DOE's approval of any activity meeting these criteria would be based on the results of the normal WIPP configuration management, regulatory compliance, and work authorization processes, which are documented in an Engineering Change Order (ECO). These normal safety and work authorization processes established at the WIPP require a comprehensive review of all activities to ensure that, prior to initiation of any activity, a comprehensive assessment of the potential environmental, industrial hygiene, safety, and operational impacts is conducted.



Mr. Frank Marcinowski

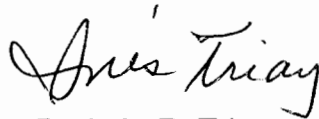
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Examples of the activities covered by this request could include tests and/or demonstrations that are being advanced to support the development of broad-based strategies for monitoring nuclear materials, for environmental characterization, and for simple science program design enhancements.

As noted above, the CBFO believes that the proposed criteria and the WIPP site ECO system reviews ensure that the subject activities will not adversely impact the on-going waste disposal operations or the long-term performance of the disposal system.

If you have additional questions regarding this request, please contact Roger Nelson at (505) 234-7213.

Sincerely,



Dr. Inés R. Triay  
Manager

cc:

L. Smith, DOE  
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Mr. Frank Marcinowski

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