Mr. Ed Ziemianski  
Acting Manager, Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221-3090  

Dear Mr. Ziemianski:  

With this letter the U.S. Environmental Protection Agency (EPA) approves remote-handled (RH) transuranic (TRU) waste characterization activities implemented by the Bettis Atomic Power Laboratory (BAPL) Central Characterization Project (CCP) to characterize RH TRU waste. Specifically, we are approving RH TRU debris waste stream (BT-T001) for disposal at the Waste Isolation Pilot Plant (WIPP). Any additional RH waste at BAPL destined for WIPP will require a separate baseline approval.  

The EPA conducted a baseline inspection of CCP's demonstration to characterize BAPL's RH TRU debris waste (Inspection Number EPA-BAPL-CCP-RH-04.11-8) between August 2010 and April 2011. During this inspection, EPA assessed the technical adequacy of the characterization performed through acceptable knowledge (AK), visual examination (VE), and dose-to-curie (DTC).  

In accordance with 40 CFR 194.8, EPA issued a Federal Register notice on June 8, 2011, announcing EPA's proposed approval of the RH TRU waste characterization program at BAPL-CCP (76 FR 33277-33280). This Federal Register notice also opened a 45-day public comment period on our proposed approval and announced the availability of the inspection report (Air Docket No: A-98-49; II-A4-147). The comment period ended July 25, 2011. EPA received no public comment on the proposed approval and the accompanying BAPL-CCP inspection report. The enclosed inspection report (Air Docket No: A-98-49; II-A4-151) is EPA's Final baseline approval report for BAPL-CCP RH.  

**Approval Summary**  

EPA determined that the records documenting BAPL-CCP's RH WC program implemented to characterize the RH debris waste stream BT-T001 were technically adequate. The approval discussed in the enclosed report is limited to the 15 high-pressure containers (HIPS) which represent the entire waste stream generated and stored at BAPL.
This approval includes the following:

1. The AK process for 15 HIPs of RH retrievably-stored TRU debris designated as Bettis Laboratory Waste Stream BT-T001

2. The radiological characterization process using DTC and scaling factors for assigning radionuclide values to Waste Stream BT-T001 that is documented in CCP-AK-BAPL-501, Revision 1, and supported by the calculation packages referenced in this report.

3. The VE process to identify waste material parameters (WMPs) and the physical form of the waste.

No changes to the approved waste characterization program are expected, therefore, there are no tiering changes designated for the BAPL-CCP RH program. However, some documents, such as the Waste Stream Profile Form (WSPF) and related attachments and the final AK accuracy report, which are typically finalized after EPA approval, are expected to be forwarded to EPA when they are finalized.

This letter and the final inspection report have been placed in the EPA docket (Air Docket No. A-98-49, II-A4-151) and posted on the EPA website at www.epa.gov/radiation/wipp.

If you have any questions, please contact Rajani Joglekar at (202) 343-9462 or Ed Feltcorn at (202) 343-9422.

Sincerely,

[Signature]
Jonathan D. Edwards, Director
Radiation Protection Division

Enclosures

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