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

MAY 16 2016

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OFFICE OF  
AIR AND RADIATION

Mr. J.R. Stroble  
Manager  
TRU Sites and Transportation Division  
Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, New Mexico 88221-3090

Dear Mr. Stroble:

This letter provides the U.S. Environmental Protection Agency's concurrence with changes made to *Waste Acceptance Criteria for the Waste Isolation Pilot Plant* (DOE/WIPP-02-3122, Revision 8.0, Draft N (Appendix F)) forwarded to the EPA by email on May 12, 2016.

EPA staff agree that the changes made to Appendix F, as documented in the enclosure, adequately address the EPA's concerns with respect to radiography operator training.

If you have any further questions please contact Ed Felcorn (202-343-9422) or Rajani Joglekar (202-343-9462).

Sincerely,

for Tom Peake  
Director  
Center for Waste Management and Regulations

Enclosure

cc: Electronic Distribution  
Alton Harris, DOE EM  
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Ricardo Maestas, NMED  
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## CARLSBAD FIELD OFFICE

### DOCUMENT REVIEW RECORD

DOCUMENT TITLE: Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant

DOCUMENT NUMBER/REVISION: DOE/WIPP-02-3122, Revision 8.0, Draft N (Appendix F)

ASSIGNED REVIEWER: EPA

DELEGATED REVIEWERS: Rajani Joglekar and Ed Feltcorn

COMMENTS DUE BY: N/A

PAGE	PARA	COMMENT	RESPONSE	REJ
Sec. F.1	1 <sup>st</sup>	EPA believes that the WAC acts as a unifier for both Federal and State requirements. The NMED's RCRA Permit requirements (prohibited items) therefore, should also be integrated in Appendix F. (Rajani Joglekar)	Comment noted. Although the WAC acts as a unifier for overlapping regulations as promulgated by Federal (EPA, NRC) and State (NMED) agencies, it does so with the intent of identifying the most restrictive physical, chemical, and radiological requirements of these agencies. In contrast, Appendices A, F, and G are specifically set aside to demonstrate compliance with EPA's requirements (just as the WAP, as contained in the WIPP Permit, is specific to promulgating NMED's requirements). EPA's and NMED's radiological imaging requirements are not the same. The focus of EPA's requirements are on estimating waste material parameters identified as important to the long term repository performance as determined from a reading of Appendix WCL of the Compliance Certification Application (1996), Appendix TRU Waste of the Compliance Recertification Application (2004, 2009), and subsequently by EPA during an inspection of LANL as detailed in the Issue Tracking Form LANL-CCP-CC-CH-2015.	
Sec. F.1	1 <sup>st</sup>	1 <sup>st</sup> Sentence. Insert "RTR" after the word "Radiography." (Rajani Joglekar)	Comment noted. Radiography as used in the context of Appendix F is an imaging technique that utilizes a variety of x-ray detection modalities including real-time radiography, digital radiography, and computed tomography. In order for Appendix F to address all of these modalities, it is necessary that no specificity be assigned to the term radiography.	
Sec. F.1	1 <sup>st</sup>	Last Sentence. The changes included here will also be incorporated in the WCPIP to harmonize the CH and RH waste characterization program requirements. (Rajani Joglekar, Ed Feltcorn)	Comment noted. Since CBFO is in the process of deciding how to merge the contents of the WCPIP and the WAC, it is premature to include any discussion on this topic at this time.	
Sec. F.1	3 <sup>rd</sup>	Beginning with 3 <sup>rd</sup> Sentence. Change the text to read as follows: While scanning the container, an approved radiography data form shall also be completed to	Comment accepted with slight modification to align with the context of the paragraph.  "An approved radiography data form shall	

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**DOCUMENT REVIEW RECORD (continuation)**

Title: Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant		Doc No: DOEWIPP-02-3122	Rev: 8.0 Draft N	Reviewers: Rajani Joglekar and Ed Felcorn
		document the waste matrix code (WMC), to verify there are no prohibited items including observable liquid in excess of the waste acceptance criteria limits, and to identify physical waste components including packaging materials for estimating their weights as the waste material parameter weights of the container's contents. (Ed Felcorn, Rajani Joglekar)	also be completed to document the waste matrix code (WMC), to verify there are no prohibited items including observable liquid in excess of the waste acceptance criteria limits, and to identify waste components including packaging materials for the purposes of estimating their weights and assigning waste material parameters to the container's contents."	
Sec. F.1	5 <sup>th</sup>	Change the text to read as follows: Containers whose contents prevent full examination during RTR shall be subject to visual examination. The reason(s) for the inability to perform full identification and the supporting AK reference shall be recorded on the RTR data form when AK suggests that visual examination would provide no additional relevant information for that container. (Rajani Joglekar)	Comment accepted with slight modification.  "Containers whose contents prevent full examination during radiography shall be subject to visual examination. If AK for the waste stream suggests that visual examination would provide no additional relevant information for that container, the reason(s) for the inability to perform full identification shall be recorded on the radiography data form with the supporting AK referenced."	
Sec. F.2	1 <sup>st</sup>	To increase clarity, EPA suggests that this section be subdivided into the following headings: <ul style="list-style-type: none"> <li>• Initial qualification process</li> <li>• Semi-annual continuing education refresher training</li> <li>• Bi-annual requalification process (Rajani Joglekar)</li> </ul>	Comment accepted with slight modification.  Rather than subdividing Section F.2 into subsections, a training summary was inserted at the end of Section F.2 that addressed the initial qualification process, semiannual continuing education refresher training, and biennial requalification (every two years).	
Sec. F.2	3 <sup>rd</sup>	Beginning with 2 <sup>nd</sup> Sentence. Change the text to read as follows: At each TRU site, radiography operators shall be instructed in AK description of TRU waste subjected to RTR verification of physical contents. (Rajani Joglekar)	Comment accepted with slight modification to align with the content of Appendices F and G.  "At each TRU waste site, the WCP radiography operators shall be instructed in the AK description of TRU waste, specific waste generating practices, typical packaging configurations, and associated waste material parameters expected to be found in each WMC at the site." Note – the acronym WCP stands for WIPP Certified Program as described in the recently approved DSA (Revision 5b).	
Sec. F.2	Last para.	Beginning with 2 <sup>nd</sup> sentence. Change the text to read as follows: Satisfactory performance is defined as the acceptable identification of prohibited items including observable liquid in excess of the waste acceptance criteria limit, the estimation of waste material parameter weights as evaluated by the SME. The operator also must score ≥80% on the comprehensive	Comment accepted with slight modification.  "Satisfactory operator performance is defined as the acceptable identification of prohibited items including observable liquid in excess of the waste acceptance criteria limit, the estimation of waste material parameter weights as evaluated by the SME, and a score of ≥80% on the comprehensive written	

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**DOCUMENT REVIEW RECORD (continuation)**

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	written exam. (Ed Feltcorn)	exam."	

COMMENT RESOLUTION APPROVED:

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Signature

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Date