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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C. 20460

MAR 14 2019

OFFICE OF
AIR AND RADIATION

Mr. Todd Shrader, Manager
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Mr. Shrader:

The U.S. Environmental Protection Agency will conduct its next inspection at the Waste Isolation Pilot Plant (WIPP) site from March 19-21, 2019. This inspection will examine the site's procedures and activities undertaken to demonstrate compliance with the public dose limits found at 40 CFR Part 191, Subpart A. The EPA will inspect WIPP's surface and underground facilities. A detailed inspection plan is attached.

Annual inspections typically focus on changes that have occurred during the previous year. This inspection will focus on the compliance activities that the site performs related to potential air emissions now that the Supplementary Ventilation System (SVS) has been fully operating for approximately a year. The EPA has already had very positive staff interactions to coordinate this inspection, and we thank you for your continued support. We ask that you expedite the security review and release of any photographs and documentation requested by the inspection team during the inspection, so that the EPA may complete this effort and issue its report to you in a timely manner. If your staff have any questions, please contact Jonathan Walsh at (202) 343-9238 or walsh.jonathan@epa.gov.

Sincerely,



Lee Ann B. Veal
Director
Radiation Protection Division (6608T)
Office of Radiation and Indoor Air

Enclosure

cc: Kirk Lachman, DOE/CBFO
Anderson Ward, DOE/CBFO
Russ Patterson, DOE/CBFO
Betsy Forinash, DOE/HQ
Alton Harris, DOE/HQ
Paul Shoemaker, SNL
Ricardo Maestas, NMED

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Susan Lucas-Kamat, NMED
EPA WIPP Team
EPA Docket

EPA WIPP Inspection Plan for 40 CFR 191 Subpart A – 2019

Purpose:

The EPA will verify that the Department of Energy (DOE) accurately monitors and calculates potential radiation doses to members of the public, due to both normal operations and accidental releases. This inspection is conducted under the authority of 40 CFR Part 191, Subpart A. This inspection is part of EPA's continued oversight to ensure that during the operational phase of management and storage of radioactive waste, WIPP complies with the limits expressed in 40 CFR 191.03.

Scope:

The scope of this inspection includes all activities performed by the DOE at WIPP to measure and calculate any actual or potential radiation dose to members of the public during management and storage of radioactive waste, specifically during the past year of site operation. Inspection activities will include an examination of monitoring procedures and sampling equipment both on and off site, and in the underground. The EPA will verify and confirm that the DOE at WIPP has complied with the "Compliance reporting" expectations of the EPA's *Guidance for the Implementation of EPA's Standards for Management and Storage of Transuranic Waste (40 CFR Part 191, Subpart A) at the Waste Isolation Pilot Plant (402-R-97-001)*, Section 4.2, Page 15.

Focal Areas for this Year's Inspection:

Several major changes have taken place related to the facility's ventilation system since 2014, including the shift to constant HEPA filtration, the addition of the Interim Ventilation System and qualification of Station B as a new source, and the addition of the Supplementary Ventilation System (SVS) and use of the Salt Handling Shaft as an exhaust point. It is the EPA's understanding that the WIPP ventilation system has undergone no major changes since the SVS became fully operational in early 2018. The 2019 inspection will be used to review the WIPP facility's current baseline activities for monitoring, sampling, and reporting potential radiological air emissions.

As in past years, sampling equipment, lab procedures, and consequence assessment will be reviewed, with the goal of demonstrating that the DOE continues to capture representative samples of facility effluent and accurately report potential dose to the public.

Location:

This inspection will be held at the WIPP facility located twenty-six miles southeast of Carlsbad, New Mexico and the surrounding vicinity as needed.

Duration:

The EPA expects to complete its inspection in three days. Each day will begin with an opening meeting and end before 5:00 p.m. with a closeout session.

Dates:

March 19-21, 2019.

Information Requested: The site has provided EPA inspection staff with electronic copies of reports and procedures related to Subpart A compliance activities in advance of the inspection. We ask that the release of any photographs or documents requested during the inspection be expedited so that EPA staff may issue the inspection report in a timely manner.