

United States Government

Department of Energy

# memorandum

Albuquerque Operations Office  
Waste Isolation Pilot Plant  
Carlsbad, New Mexico 88221

DATE: JUN - 5 1986  
REPLY TO:  
ATTN OF: WIPP:RAC 86:0962  
SUBJECT: WIPP Plan for Compliance with 40 CFR 191

TO: Jack Roeder, Assistant Manager, Office of Safeguards & Safety, AL

Pursuant to our recent telephone conversation we are attaching the plan for evaluating and documenting compliance with 40 CFR 191, entitled "Environmental Standards for Management and Disposal of Spent Nuclear Fuel, High-Level, and Transuranic Radioactive Wastes" promulgated in September, 1985. The Compliance Plan describes the proposed methodology to demonstrate that all applicable requirements of Subpart A (Management and Storage) and Subpart B (Disposal) are met. This includes assessment of doses to members of the public during management and storage operations, evaluation of radionuclide releases over 1,000 and 10,000 years based on performance assessment, and preparation and implementation of plans related to assurance requirements.

The schedule for the compliance activities will need to be coordinated with other WIPP studies and milestones. The draft plan indicates that compliance with Subpart A will be evaluated and documented on an annual basis following the first receipt of CH-TRU waste. Evaluation of compliance with Subpart B will be coordinated with the first receipt of waste in October, 1988, and the decision to either retrieve or to proceed with disposal, approximately five years after the first receipt of waste.

The State of New Mexico's Environmental Evaluation Group has requested DOE's schedule, plans, and milestone dates for the evaluation of compliance with 40 CFR 191 in order to prepare budget estimates. Also, since the WIPP is the first nuclear disposal facility which will be required to demonstrate compliance with 40 CFR 191, little guidance exists regarding the scope and nature of such a compliance evaluation.

For these reasons, your review of the proposed compliance approach as described in the attached plan would be greatly appreciated. In addition, we would like to meet with you and your staff to discuss your comments on this compliance plan.

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J. Roeder

Page 2

Dick Crawley of my staff will contact you in the near future to establish a meeting date. Should you have any questions, please contact him.



W. R. Cooper  
Project Manager

Attachment

cc:

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M. Wilson, OCC, AL  
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R. Coleman, WEC