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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 9, 1996

Mr. George Dials, Manager
Carlsbad Area Office
Department of Energy
P. O. Box 3090
Carlsbad, New Mexico 88221

Mr. Joe Epstein, General Manager
Westinghouse Electric Corporation
P.O. Box 2078
Carlsbad, New Mexico 88220

Dear Messrs. Dials and Epstein:

RE: Clarification of issues raised at the April 4, 1996 meeting

This letter and enclosure contains HRMB's clarification of issues raised by representatives of DOE and Westinghouse Waste Isolation Division (WID) at a meeting with HRMB staff held in Santa Fe on April 4, 1996. The purpose of this meeting was to discuss proposed DOE/WID responses to HRMB's March 14, 1996, Notice of Deficiency (NOD) on the WIPP RCRA Part B Permit Application, Revision 5.2, and to clarify the intent of some additional comments within the NOD.

If you have any questions concerning this clarification of the recent NOD, please contact Ms. Barbara Hoditschek or Mr. Steve Zappe at (505) 827-1561.

Sincerely,

Benito J. Garcia
Chief, Hazardous & Radioactive Materials Bureau

Enclosure

cc: Ed Kelley, NMED
Barbara Hoditschek, HRMB
Steve Zappe, HRMB
Susan McMichael, NMED OGC
Karen Day, WID
Craig Snider, DOE
David Neleigh, EPA Region 6
Matt Hale, EPA OSW
Victor Sgobba, GAO

Connie Walker, A.T. Kearney
Lindsay Lovejoy, NMAG
Don Hancock, SRIC
WIPP File - Red '95

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Questions raised at the April 4, 1996 meeting between DOE, Westinghouse, and HRMB:

1. Clarify Chapter C, specific comment 5, page 10 - How can a response to this comment be crafted such that it is neither too simplistic (i.e., state that each waste summary category group contains all EPA codes on the Part A) nor too detailed (i.e., reiterate all the details on Table C-2)?
 - The intent of this comment was to modify the text of the application to include a somewhat more comprehensive discussion of waste within each Summary Category Group. Specifically, the text should be revised to discuss the major hazardous wastes anticipated for each group. While Table C-2 includes this information, a summary discussion would help the reader understand the principal hazardous wastes of concern within each Summary Category Group.

2. Clarify Appendix C2, general comment 2, page 24 - What is meant when the NOD requests "correlations of hazardous wastes versus waste matrix code groups"?
 - The intent of this comment was to acquire information so that data on Table C-2 and information in Appendix C2 could be directly compared to assess how the waste descriptions and associated EPA codes correlate to headspace gas data. This would be a good preliminary check of the accuracy of waste descriptions and EPA codes on Table C-2 (presumably identified by process knowledge) with the actual headspace gas data. The comment asked that a listing of anticipated hazardous waste codes within each waste matrix code group be included in Appendix C2 (e.g., on Table C2-3), based upon the headspace gas analysis results on Table C2-4. However, the question should have been worded to require correlation of either the TRUCON code (on Table C2-4) or waste stream unique ID (not on Table C2-4) with the corresponding descriptions on Table C-2. This would illustrate correlation between actual headspace gas data and site-specific process knowledge-defined waste characterization.