



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 30, 1997

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: Recent Submittal of Revision 6.3 to WIPP RCRA Part B Permit Application
EPA I.D. Number NM4890139088

On May 16, 1997, the Hazardous and Radioactive Materials Bureau (HRMB) received proposed changes to the WIPP RCRA Part B permit application submitted by the Department of Energy and Westinghouse (DOE/WID). These changes, referred to as Revision 6.3, were meant to clarify, modify, or supplement material previously found in the permit application.

Upon a cursory review, HRMB identified numerous inconsistencies between the redline/strikeout pages, the replacement pages, and the corresponding WordPerfect files. DOE/WID agreed to correct these problems, and on June 13, 1997, provided revisions to supersede the earlier submittal in its entirety.

However, this most recent submittal manifests many of the same problems identified by HRMB in the first submittal. Following is a partial list of discrepancies encountered during a spot check of the June 13, 1997 revisions:

1. A replacement page differs from the WordPerfect file, but the change is not reflected in a redline/strikeout page.
2. A replacement page differs from the redline/strikeout page, and both are inconsistent with the WordPerfect file.
3. Typographical errors occur in the WordPerfect file, but are not reflected on either the replacement page or the redline/strikeout page.
4. A WordPerfect file contains redline/strikeout annotation, even though it is supposed to be the "clean" file.
5. A replacement page does not have a corresponding redline/strikeout page indicating what, if anything, was changed.
6. A WordPerfect file reverts from Rev 6.1 of the permit application back to Rev 6.0, but not entirely.
7. Some replacement pages do not have corresponding WordPerfect files.

970623



Messrs. Dials and Epstein
Page 2
June 30, 1997

DOE/WID has indicated that it cannot identify the WordPerfect files from which the official paper copies were created. To assist DOE/WID to identify the pertinent files, HRMB has enclosed original copies of all "clean" WordPerfect 5.x files which were submitted as Revisions 6, 6.1, and 6.2 to the WIPP RCRA Part B permit application.

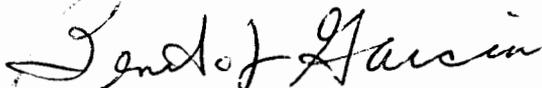
HRMB recognizes that while the only official submittal is the paper version of the application, the corresponding WordPerfect files are crucial in preparing the draft permit. To ensure consistency between paper and electronic media, HRMB rejects the May 16 and June 13, 1997 submittals and establishes the following conditions for accepting future submittals relating to the permit application:

1. Individual replacement pages are unacceptable. Any text changes must be accomplished by replacing the entire affected chapter or appendix.
2. Redline/strikeout pages must be provided to indicate all text changes. Redline/strikeout files are unnecessary and should not be submitted.
3. The WordPerfect 5.x files must be the same files used to generate paper copies of the replacement chapters or appendices.
4. Provide a pedigree for each modified WordPerfect file submitted to HRMB, identifying the date and time of the file before and after modification.
5. Provide HRMB with three hardcopies and one WordPerfect 5.x copy of any submitted information.

As usual, you may coordinate shipments with Mr. Steve Zappe of my staff.

Thank you for your cooperation. If you have any questions, please contact Mr. Zappe at (505) 827-1561.

Sincerely,



Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

Enclosure:

Revision 6.0 (two floppies)
Revision 6.1/6.2 (two floppies)

cc (w/o enclosures):

Ed Kelley, NMED
Stu Dinwiddie, HRMB
Steve Zappe, HRMB
Susan McMichael, NMED OGC
Cooper Wayman, CAO
Gloria Barnes, WID
David Neleigh, EPA Region 6
Frank Marcinowski, EPA ORIA
Connie Walker, A.T. Kearney
File: Red WIPP '97
Track: WIPP, 6/30/97, Dials, Garcia, RE: