



Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221

July 18, 1997



Mr. Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau (HRMB)
New Mexico Environment Department
2044-A Galisteo Street
Santa Fe, NM 87505

Subject: Response to NMED Letter of June 18, 1997: WIPP Groundwater Monitoring Plan EPA I.D. Number NM4890139088

Dear Mr. Garcia:

In response to your letter dated June 18, 1997, we have enclosed a revised Groundwater Monitoring Plan (GMP) for the Waste Isolation Pilot Plant. The corresponding electronic file, Cross Reference Summary Table, redline/strikeout version, and responses to comments will be provided upon our receipt of material from the contract laboratory. This material will be provided to you early in the week of July 21, 1997. This revised plan replaces Appendix D18 in the WIPP Resource Conservation and Recovery Act (RCRA) Permit Application. Due to the extent of the changes, the entire plan is marked as Revision 6.4 and should replace the plan submitted as Revision 6.2 in its entirety. All changes have been made to either modify, clarify or supplement previously submitted information.

We have deleted the two attachments that contained the various standard operating procedures (SOPs) associated with the GMP. These SOPs will be provided to the HRMB through other mechanisms as specified in your letter. Specifically, a revised set of contract laboratory SOPs will be provided as soon as the revisions are received from the laboratory. We anticipate providing these to you in early September. This will be an informational copy as indicated in your letter. If changes are made to these SOPs, they will be provided to the HRMB in a timely manner. WIPP procedures referenced in the GMP are among those routinely supplied to the HRMB through the WIPP Controlled Document distribution system. The HRMB will continue to receive routine updates to these procedures.

In your letter, you requested clarification regarding our request for a groundwater monitoring waiver. We have decided to withdraw this request based on the NMED's stated intent to draft a permit that requires the operation of a groundwater contamination detection program. Given your intent, we believe that withdrawing the request is the best course of action to facilitate your timely review of the application and issue a draft permit. We maintain that the demonstration of no-migration, found in Appendix E1 of the permit application, which forms the basis for the waiver request, is valid. Therefore, we do not believe that a revision to the permit application to remove this information is necessary or warranted. We request that this letter provide adequate notification of withdrawal of the waiver request.



July 18, 1997

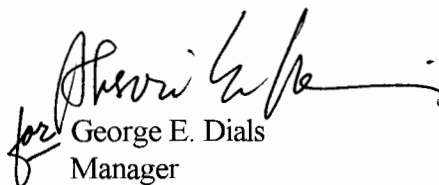
Finally, in your letter, you asked for clarification of the term "new text" in our response to your February 25, 1997 comments on the GMP. In all cases, the "new text" was provided to either supplement, clarify, or modify the previously provided information consistent with your specific February 25, 1997 comments and requests. As stated previously, a "Cross Reference Summary Table" showing which text supplemented, clarified or modified existing text will be provided.

For the purpose of establishing the pedigree for the electronic version of this submittal, the following information is relevant:

The attached Appendix D18 was generated from file R4180D18.WPD created on 3/23/95. It was submitted to NMED on 4/12/96 as Appendix D18, Revision 6.0 as file APD18.WPD (2,142 bytes) dated 4/10/96, 3:22 p.m.; it was revised and submitted to NMED on 3/20/97, Appendix D18, Revision 6.2 as file R4134D18 (346,221 bytes) dated 3/19/97, 11:55 p.m.; it has been revised and printed and is attached to this letter as Appendix D18, Revision 6.4 as a hard copy and as an electronic file named APPD18.FNL (306,783 bytes) dated 7/15/97, 10:09 a.m. All electronic submittals have been converted to WordPerfect 5.1/5.2 format at the request of NMED.

If you have any questions regarding this material, please contact Mr. Craig Snider at 234-7452.

Sincerely,


George E. Dials
Manager

Enclosures

cc w/encl:
C&C File

cc w/o encl:
C. Wayman, CAO
M. McFadden, CAO
K. Hunter, CAO
A. Miner, CAO
J. Epstein, WID
G. Barnes, WID
K. Donovan, WID
B. Kehrman, WID
P. Kilgore, CAO