Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

Ms. Lee Ann B. Veal, Director
Radiation Protection Division
Office of Radiation and Indoor Air
William Jefferson Clinton Building, West
1301 Constitution Ave NW, Mail Code 6608T
Washington, D.C. 20004

Subject: Response 2 to U.S. Environmental Protection Agency's 2019 Compliance Recertification Application Completeness Comments Letter dated March 23, 2020 from Tom Peake to Mike Brown.

Dear Ms. Veal:

In response to the U.S. Environmental Protection Agency (EPA) 2019 Compliance Recertification Application completeness comments and questions letter dated March 23, 2020, the U.S. Department of Energy (DOE) is providing responses to 9 (including sub comments) of the EPA's completeness questions. The DOE will continue to submit phased responses to the EPA to ensure questions are answered in a timely manner. Comments requiring clarification or more extensive analysis will be submitted at a later date, yet to be determined.

This submittal includes four enclosures:

- Enclosure 1 is a hardcopy of 9 of the EPA's comments with DOE's responses;
- Enclosure 2 is a hardcopy of the "CRA-2019 Errata Tracking." The table is a cumulative list of errata that have been identified and corrected up to this point.
- Enclosure 3 is a hardcopy of the "Status Report of DOE Responses to EPA Completeness Questions." The report is a table showing the status of all EPA comments received to date.
- Enclosure 4 (USB drive) provides the electronic version of the references as noted in each response. Also included are electronic versions of Enclosures 1, 2 and 3.

Below are the 9 responses being provided in Enclosure 1:

EPA Letter Date	EPA Comment Number	EPA Comment Description
March 23, 2020	CC1-33-3	Completeness request for Borehole plugging database
March 23, 2020	CC1-34-4	Panel Closure Designs Completeness request
March 23, 2020	CC1-34-5	Panel Closure Designs and Construction Completeness request.
March 23, 2020	CC1-34-7	Corrections to Relative Permeability Models
March 23, 2020	CC1-34-8	BRAGFLO representation of shafts and concrete

EPA Letter Date	EPA Comment Number	EPA Comment Description
		Monolith plug
March 23, 2020	CC1-42-1	(Monitoring) Questions regarding changes in CRA-2019 DPA and MONPAR analysis
March 23, 2020	CC1-51/52-1	(Consideration of Protected Individual and Exposure Pathways) CRA-2019 changes' impact on IGP
March 23, 2020	CC1-MASS-1	Definition of Conservative
March 23, 2020	CC1-MASS-2	Identification of conservative assumptions leading to lower releases

If you have any questions, please contact Russ Patterson at (575) 706-0027.

Sincerely,

Gregory Sosson

Digitally signed by Gregory Sosson
DN: c=us, o=u.s. government, ou=department of energy, ou=Energy IT Services, ou=DOE Common Operating Environment, ou=People, cn=Gregory Sosson
Date: 2020.07.08 16:47:28 -06'00'

Gregory Sosson
Acting Manager
Carlsbad Field Office

Enclosures (4)

cc: w/enclosures
I. Rosencrantz, EPA *ED
T. Peake, EPA ED
R. Lee, EPA ED
CBFO M&RC
*ED denotes electronic distribution

cc: w/o enclosures
M. Brown, CBFO *ED
R. Patterson, CBFO ED
G. Basabilvazo, CBFO ED
M. Navarrete, CBFO ED
A. Ward, CBFO ED
*ED denotes electronic distribution