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

March 30, 2021

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 10 to U.S. Environmental Protection Agency's 2019 Compliance Recertification Application Completeness Comments, Letters dated September 11, 2020 and November 13, 2020, from Tom Peake to Mike Brown

Dear Ms. Veal:

In response to the U.S. Environmental Protection Agency's (EPA) 2019 Compliance Recertification Application (CRA) completeness comments and questions from the letter dated September 11, 2020 and November 13, 2020, the U.S. Department of Energy (DOE) is responding to nine (including sub comments) of EPA's completeness questions. The DOE has addressed each comment according to the DOE position, data collected during the CRA-2019 data collection period Jan. 2013 - Dec. 2017, and previous agreements with the EPA. The DOE will continue to submit phased responses to the EPA to ensure questions are answered promptly. Comments requiring clarification or more extensive analysis will be submitted at a later date.

This submittal includes four enclosures:

- Enclosure 1 is a hardcopy of nine 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.
- 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 (eDocs *EPA Document Transfer* workspace) provides the electronic version of the references noted in each response and not previously provided to EPA. Also included are electronic versions of Enclosures 1, 2 and 3.

Below are the nine responses provided in Enclosure 1.

EPA Letter Date	EPA Comment Number	EPA Comment Description
November 13, 2020	CC6-GEOCHEM-28	Iron-Sulfate Pitzer Parameters and Solid Phases Not Included in DATA0.FM4
November 13, 2020	CC6-GEOCHEM-29	Adequacy of Lead Parameterization in DATA0.FM4
November 13, 2020	CC6-GEOCHEM-31	Comparison of Modeled and Experimental Glushinskite Data

EPA Letter Date	EPA Comment Number	EPA Comment Description
November 13, 2020	CC6-Hydro-12	Modeling Performed by Thomas, et. al. (2017)
September 11, 2020	CC5-SCR-8	Screening Argument for Galvanic Coupling within the Repository (FEP W50)
September 11, 2020	CC5-SCR-9	Screening Decision for Gas Generation by Lead Corrosion (FEPs W5 and W49)
September 11, 2020	CC5-SCR-10	Natural (N) FEPs and related updates
November 13, 2020	CC5-SCR-11	Updates to seismic activity FEPs
September 11, 2020	CC6-TFIELD-1	Recalculation of TFIELDS

If you have any questions, please contact Dr. Anderson L. Ward at (575) 706-5291.

Sincerely,

Reinhard M. Knerr

Digitally signed by Reinhard M. Knerr
Date: 2021.03.30 11:25:00 -06'00'

Reinhard Knerr
Manager
Carlsbad Field Office

Enclosures (4)

cc: w/enclosures
I. Rosencrantz, EPA *ED
T. Peake, EPA ED
R. Lee, EPA ED
R. Hernandez, RES ED
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*ED denotes electronic distribution

cc: w/o enclosures
M. Brown, CBFO *ED
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