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

March 4,2021

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 9 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 letters 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 (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. (Note: References not provided previously will be uploaded to e-Docs and made available to the EPA.)

Below are the nine responses provided in Enclosure 1.

EPA Letter Date	EPA Comment Number	EPA Comment Description
September 11, 2020	CC5-MON-4	Data errors and anomalies in Delaware Basin Drilling Surveillance Program
September 11, 2020	CC5-MON-5	Response rate of Delaware Basin Drilling Surveillance Program surveys of area operators
September 11, 2020	CC5-MON-6	Uncounted shallow sulfur exploration holes previously identified from New Mexico

EPA Letter Date	EPA Comment Number	EPA Comment Description
November 13, 2020	CC6-GEOCHEM-30	Jang and Kim (2016) Report Request
November 13, 2020	CC6-GEOCHEM-32	Effects of Shielded Containers on Steel Surface Area per Unit Volume
November 13, 2020	CC6-GEOCHEM-33	Humid Steel Corrosion Parameter
November 13, 2020	CC6-GEOCHEM-34	Incorrect Units for Gas Generation and Brine Production Rates
November 13, 2020	CC6-GEOCHEM-35	Omission of Brine Radiolysis Effects from Appendix GEOCHEM Discussions of Radiolysis and the Brine Production Model
September 11, 2020	CC5-SCR-7	Effects of Cementitious Components of Repository Shaft Seals (FEPs W8 and W56)

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

Sincerely,

Reinhard M. Knerr

Digitally signed by Reinhard M. Knerr
Date: 2021.03.04 10:33:42 -07'00'

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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CBFO M&RC
*ED denotes electronic distribution

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