UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

OFFICE OF
AIR AND
RADIATION

3/23/2020

Mr. Mike Brown
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Mr. Brown.

The U.S. Environmental Protection Agency has begun its completeness review of the U.S. Department of Energy's (DOE) 2019 Compliance Recertification Application (CRA-2019) for the Waste Isolation Pilot Plant (WIPP). This letter transmits the first set of Agency completeness comments and questions (see attached). We will coordinate with you on the responses to the comments and questions.

One issue that I want to bring to your attention is that some sections of the CRA-2019 submitted in March of 2019 have not been updated to reflect the deferred performance assessment submitted in December of 2019. Although the DOE completed the deferred performance assessment, the DOE did not provide the EPA with an updated compliance assessment, continuing instead to rely upon data from CRA-2014. Given the new approach to the calculations and the additional six metric tons of plutonium in the inventory, the compliance assessment is a necessary part of the CRA to assure repository compliance and should thus be updated to reflect more recent information. In the attached document, please see comment CC1-51/52-1 (Consideration of Protected Individual and Exposure Pathways), which addresses this topic. We plan to identify any other areas that we believe have similar issues in our next set of completeness comments.

We look forward to your response to these questions. If you have any questions concerning this request, please contact me at peake.tom@epa.gov (202-465-5904) or Ingrid Rosencrantz at rosencrantz.ingrid@epa.gov (202-579-5157).

Sincerely,

Tom Peake

Tom Peake
Director
Center for Waste Management and Regulations

Enclosure

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