Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
October 19, 2020

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 5 to U.S. Environmental Protection Agency's 2019 Compliance Recertification Application Completeness Comments Letters dated May 6, 2020 and June 12, 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 in the letters dated May 6, 2020 and June 12, 2020, the U.S. Department of Energy (DOE) is providing responses to 7 (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.

This submittal includes four enclosures:

- Enclosure 1 is a hardcopy of 7 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: All references will be uploaded to e-Docs and made available to EPA as well.)

Below are the 7 responses being provided in Enclosure 1:

EPA Letter Date	EPA Comment Number	EPA Comment Description
May 6, 2020	CC2-Geochem 11 (b-c)	Data used to Derive $Ca_2EDTA \bullet 7H_2O(s)$ Solubility Product and Evaluation of the Solubility Product
May 6, 2020	CC2-MON-1 (a-c)	Seismicity and seismic monitoring data
June 12, 2020	CC3-Geochem 18	Reference Request
June 12, 2020	CC3-Hydro 1	Radionuclide Transport Questions Answered by Radiokrypton Analyses
June 12, 2020	CC3-Hydro 2	Corrections to Atmospheric Pressure

EPA Letter Date	EPA Comment Number	EPA Comment Description
June 12, 2020	CC3-Hydro 5 (a-c)	Additional Understanding of Water-Level Changes in the Culebra
June 12, 2020	CC3-Hydro 6	Quality Assurance Requirements for Thomas et al. (2017)

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

Sincerely,

Reinhard Knerr
Manager
Carlsbad Field Office

Enclosures (4)

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

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