



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 28 2002



Dr. Inés R. Triay, Manager
Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, NM 88221

Dear Dr. Triay:

On January 23, 2002, the Environmental Protection Agency (EPA) received the final version of proposed changes to the Contact-Handled Transuranic Waste Acceptance Criteria (CH-WAC) for the Waste Isolation Pilot Plant (DOE/WIPP 02-3122, Rev. 0) for approval. The impetus for the new CH-WAC came from the Nuclear Regulatory Commission's approval of the TRUPACT-II Safety Analysis Report.

The Carlsbad Field Office (CBFO) has taken this opportunity to propose revisions to the EPA-related components of the CH-WAC to achieve consistency across Department of Energy (DOE) sites' transuranic (TRU) waste characterization activities. We hereby approve the proposed CH-WAC containing the following key changes applicable to radiological characterization of TRU waste:

- Clarify the requirement for the measurement and reporting of the concentrations of radionuclides for each payload container, and reporting of total measurement uncertainty at the 68% interval (that is, one standard deviation assuming a double-sided distribution).
- Clarify the requirement for the determination of the TRU alpha activity concentration and reporting of its associated uncertainty.
- Replace the term "minimum detection limit" with a new term "lower limit of detection" when reporting in the WIPP Waste Information System (WWIS) any WIPP-tracked radionuclides whose concentrations are below the detection limit of the measurement equipment.
- Specify that using WIPP-certified nondestructive assay (NDA) systems, each site must:
 - Identify and measure 10 WIPP-tracked radionuclides in all TRU waste containers and report them in WWIS on container basis; and
 - Identify, measure, and record non-WIPP tracked radionuclides.

020245



- Allow use of alternative approaches for identifying and quantifying radioisotopes as long as the alternative approaches are approved by CBFO in consultation with EPA.
- Replace replicate assays with weekly instrument performance measurements using an interfering matrix to assess the long-term stability of the NDA instrument's matrix correction.
- Specify that there is no restriction for NDA batch size but retain a batch size of < 20 for radiochemistry measurements.
- Identify and quantify the criteria for determining the acceptable range of performance.
- Specify that TRU sites must report radiological properties in either the radioassay batch report or another quality assurance record or database.


We have determined that these changes will not adversely impact the containment of TRU waste at WIPP. In addition, we have determined that these changes do not constitute a significant change to our May 1998 Certification Decision.

The CH-WAC that we are approving today does not describe the full range of requirements that apply to the compilation and use of acceptable knowledge (AK) when characterizing and reporting the waste contents. We expect that DOE activities under the updated CH-WAC will be fully consistent with the AK program requirements accepted by EPA as part of the 1998 Certification Decision. TRU waste sites must comply with all applicable EPA requirements, as reflected in the CH-WAC and other documents.

In a November 2001 letter to CBFO, we provided comments on the draft CH-WAC (DOE/WIPP-Draft E-3122, Revision 0) and the accompanying Technical Basis Document (TBD), dated September 27, 2001. Please send us a copy of the TBD that you distribute to the sites.

If you need further assistance, please contact Rajani Joglekar at (202) 564-7734.

Sincerely,



Frank Marcinowski, Director
Radiation Protection Division

cc: Ava Holland, DOE/CBFO
Nick Stone, EPA Region VI
✓ Steve Zappe, NMED
Matthew Silva, EEG