



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

JUN 24 2016

OFFICE OF  
AIR AND RADIATION

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

Dear Mr. Shrader:

The U.S. Environmental Protection Agency has completed its review of work undertaken by the Department of Energy (DOE) to qualify Station B for sampling facility exhaust from the Waste Isolation Pilot Plant (WIPP). The EPA finds that with the Interim Ventilation System (IVS) added to the existing Underground Ventilation and Filtration System (UVFS), air samples taken at Station B will continue to accurately represent facility exhaust for the purposes of compliance with the public dose limits found at 40 CFR part 191, Subpart A and 40 CFR part 61, Subpart H.

The EPA has closely followed the design and construction of the WIPP Interim Ventilation System (IVS), which adds capacity to the site's HEPA-filtered exhaust system. The EPA's primary interest in this modification to the exhaust system is to ensure that the site retains the ability to accurately sample any radionuclide emissions from the facility. Under planned operations, Station A was used to sample facility exhaust for compliance purposes. Now that the facility operates under constant HEPA filtration, Station B, located downstream of the filtration system, represents facility exhaust to the environment. When the facility began operations, single-point sampling using shrouded probes at each of these locations was approved as an alternate sampling method under the then-current ANSI/HPS N13.1-1969 standard ("Guide to Sampling Airborne Radioactive Materials in Nuclear Facilities"). The WIPP's sampling equipment was grandfathered for use at the WIPP after the ANSI standard was updated. The modification of the exhaust system to include the IVS requires that Station B be qualified as a sampling point under the updated ANSI/HPS N13.1-1999 standard, using the same process that would be followed for a new emissions source.

On June 3, the DOE submitted a final report to the EPA, "Evaluation of Duct Mixing and Sampling System for Interim Ventilation System at the Waste Isolation Pilot Plant." The report describes the steps that the site took to qualify sampling Station B. The DOE additionally provided supporting material, including data from a geometrically-similar stack used in the qualification process. EPA personnel visited the WIPP site on April 26 and 27, 2016, to observe testing that was performed to support the qualification of the Station B sampling equipment. The EPA's observations and review of data and materials submitted by the DOE show that the DOE has identified and correctly implemented appropriate methods to qualify Station B under ANSI/HPS N13.1-1999 standard. The EPA's review activities are documented in the report, "Review of Station B Qualification and Observation of Station B Coefficient of Variation Testing," enclosed with this letter.

The Agency will continue to monitor the WIPP's regulatory compliance throughout facility recovery. Prior to the resumption of waste emplacement, the EPA will inspect the facility for compliance with Subpart A and Subpart H, as well as commitments made under the Certification. If you have any questions regarding this letter or the enclosed report, please contact Jonathan Walsh at (202) 343-9238.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Perrin", with a long horizontal flourish extending to the right.

Alan Perrin  
Acting Director  
Radiation Protection Division

Enclosure

cc: George Basabilvaso, DOE/CBFO  
Russ Patterson, DOE/CBFO

Alton Harris, DOE/HQ  
Susan Spalding, EPA R6  
Ricardo Maestas, NMED  
EPA WIPP Team  
EPA Docket