

12/14/94

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Dr. Robert G. Baca, Manager
Performance Assessment & Hydrologic Transport Element
Center for Nuclear Waste Regulatory Analyses
Southwest Research Institute
6220 Culebra Road
P.O. Drawer 28510
San Antonio, Texas 78228-0510

SUBJECT: REVIEW OF EPA COMMENTS ON WIPP PA:
INTERMEDIATE MILESTONE 5702-711-501

Dear Dr. Baca:

On November 30, 1994, the Center for Nuclear Waste Regulatory Analyses (CNWRA) transmitted the review of the EPA comments on the Waste Isolation Pilot Plant (WIPP) performance assessment. Based on our review, conducted by James Firth, it was determined that this review was transmitted on time and is adequate and consistent with the technical direction provided to the CNWRA. Therefore, the transmitted document acceptably meets the requirements of Intermediate Milestone 5702-711-501.

The insights on quality assurance (QA) are consistent with the letter of direction and appear to accurately reflect the context of EPA's comments at the time that they were written. However, drafts of the WIPP compliance criteria proposed rule indicate that the position of EPA on quality assurance has evolved since the time that the EPA comments were written. These changes indicate that EPA is taking a more structured approach to QA and has accepted NRC staff recommendations on appropriate QA practices. It would have been helpful for the CNWRA to qualify the conclusion that the approaches of EPA and NRC are distinctly different with the more recent information. Future reviews should reference, whenever practical, recent information.

If you have any questions regarding the contents of this letter, please contact Tim McCartin at (301) 415-6681.

Sincerely,

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Timothy McCartin, Manager
Performance Assessment & Hydrologic
Transport Program Element
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

cc: S. L. Fortuna, PMDA
B. D. Meehan, CAB

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