

US EPA ARCHIVE DOCUMENT

From: [Lee, Raymond](#)
To: [Lee, Raymond](#)
Subject: RE: Draft Letter to Forward CCP's Procedure to EPA for Review
Date: Monday, June 03, 2013 3:47:44 PM

From: Peake, Tom
Sent: Tuesday, April 23, 2013 3:17 PM
To: Feltcorn, Ed
Cc: Patterson, Russ (CBFO); JR Stroble; 'marcus.pinzel@wipp.ws'; 'Harris, Alton'; Ghose, Shankar; Economy, Kathleen; Walsh, Jonathan; Kouba, Steve - WRES
Subject: RE: Draft Letter to Forward CCP's Procedure to EPA for Review

Ed,

Seems to be pretty good overall and I will be interested in seeing it implemented, but the procedure has a major flaw in the contact dose msmt part. It does not appear to address our statistical concerns. Please correct me if I am wrong.

The procedure does not appear to account for dose rate measurement uncertainty, and that is one of our primary concerns. I don't see us signing off on this as it stands (at least w/o additional info) because of that. We want to make sure that the dose rate really is below 200 mrem/hr. I do not want us to have to deal with measurements like the 270 mrem/hr from the Hanford drum(s) that showed up at the WIPP site a few years ago. I am really surprised that the procedure uses 200 mrem/hr and not something less.

Are there any statistics to back up the approach that says if all of the different measurements in attachment 2 of the procedure are below 200 mrem/hr then, given the 20-30% measurement uncertainty, there is 90% or higher confidence that the package is truly below 200 mrem/hr? A 200 mrem/hr measurement could really mean 240 mrem/hr with measurement uncertainty. This has to be addressed before we can concur with the procedure.

Tom