



U. S. Department of Energy
National Nuclear Security Administration
Pantex Site Office
P. O. Box 30030
Amarillo, TX 79120-0030



APR - 1 2004

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Mr. Robert Musick, Pantex Project Manager
Office of Permitting Remediation and Registration
Texas Commission on Environmental Quality
Corrective Action Section, MC-127
P. O. Box 13087
Austin, TX 78711-3087

Re: U. S. Department of Energy National Nuclear Security Administration Pantex Plant
TCEQ Solid Waste Registration No. 30459
TCEQ Hazardous Waste Permit No. HW-50284
EPA ID No. TX 4890110527
Calculation of the Exposure Point Concentration (EPC) for the Human Health Risk
Assessment (HHRA)

Dear Mr. Musick:

We previously provided the *Revised Final Baseline Risk Assessment (BRA) Work Plan (February 2003)*, containing the basic approach to the HHRA. The plan provided the approach to calculation of the EPC when the distribution of data were normal or lognormal (pg. 6-15). However, no method was presented for cases where data distributions were *neither* of these, or in situations where the data had greater than 50 percent non-detects.

To maintain consistency between the risk assessments (RA), we plan to use the same methodology in the HHRA as approved for the Ecological Risk Assessment (ERA). We will treat the ERA data as a normal distribution in the situations listed above. The explanation for this method was included in the original letter to TCEQ, requesting the use of this method for the ERA (Enclosure A). The TCEQ approval letter for this method was dated January 12, 2004 (Enclosure B).

We will continue to use the lower of the maximum detected value, or the calculated 95 percent upper confidence limit, as provided in the BRA Work Plan. Concerns regarding hotspot analysis, noted in the TCEQ approval letter (Enclosure B) are addressed through the exposure area plan development discussed in Section 6.2.1.1 and Appendix A of the BRA Work Plan. That plan was specifically developed to address previous regulator concerns regarding the size of the exposure areas and the potential presence of hotspots.

Pantex plans to immediately implement this EPC approach with the development of the Burning Ground RA. Timely resolution of any questions or concerns is highly important in order to preclude impacting the current RA schedule. Therefore, you are encouraged to contact directly the BWXT RA Focus Team Representative, Michelle Bolwahn, at (806) 477-6326 if you have questions or concerns regarding this approach.

Mr. Robert Musick, TCEQ, Austin

2

APR - 1 2004

If you have any questions, please contact Johnnie Guelker of my staff at (806) 477-3183.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry S. Johnson". The signature is fluid and cursive, with the first name "Jerry" being particularly prominent.

Jerry S. Johnson
Assistant Manager for Environmental
& Site Engineering Programs

3 Enclosures

cc w/o enclosures:

R. Seiler, TCEQ, Austin
D. Boothby, TCEQ, Austin
M. Vickery, TCEQ, Austin
A. Rahman, TCEQ, Austin
B. Jones, TCEQ, Amarillo
R. Lee, TCEQ, Amarillo
J. Hepola, EPA, Dallas
C. Hueni, EPA, Dallas
R. Mulder, TCPA, Austin

Mr. Robert Musick, TCEQ, Austin

3

APR - 1 2004

bcc w/o enclosures (via email):

J. Guelker, SS, PXSO

H. Hanson, SS, PXSO

V. Battley, PWT, Pantex

L. Trent, ES&H/ES, BWXT

D. Huddleston, ERS, BWXT

M. Bolwahn, ERS, BWXT

M. Layton, A/R-ERS, BWXT

Enclosure A
Pantex Letter to TCEQ proposing EPC methodology
For the Ecological Risk Assessment

Enclosure B
TCEQ Approval Letter for the Ecological Risk Assessment
EPC Methodology

Enclosure C
Final Meeting Summary for the
Ecological Risk Assessment Focus Team Meeting