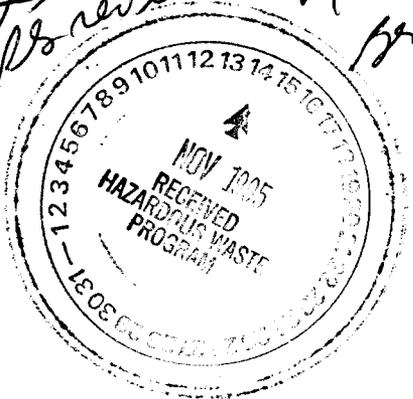




Department of Energy
 Field Office, Albuquerque
 Los Alamos Area Office
 Los Alamos, New Mexico 87544

NOV 06 1995

Jim S. review + discuss w/ me Smith



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Bureau Chief
 Hazardous and Radioactive Materials Bureau
 New Mexico Environment Department
 2044 Galisteo St., Building A
 P. O. Box 26110
 Santa Fe, NM 87505

Dear Mr. Garcia:

Subject: Notice of Completion of Generator Interviews, Activity 3.3A
 in the Site Treatment Plan Federal Facility Compliance Order,
 October 4, 1995

The purpose of this letter is to inform you that the Department of Energy (DOE) and the University of California (University) have completed Activity 3.3A on page 15 of the Compliance Plan Volume (CPV, Exhibit A) of the STP. The Federal Facility Compliance Order (FFCO) requires that DOE and the University complete interview of the generators of legacy low-level mixed waste in the five treatability groups included in Section 3.3 of the CPV, which were described as mixed wastes requiring further characterization or for which technology assessment has not yet been done, by October 30, 1995. Section XX of the October 4, 1995 FFCO, issued by the New Mexico Environment Department (NMED) to implement the Site Treatment Plan (STP) at Los Alamos National Laboratory (LANL), requires that DOE and/or the University notify NMED by letter of the completion of any required activities set forth in the FFCO.

LANL has completed all of the generator interviews. They are reported in LANL's "Report for the Characterization Review of Low-Level Mixed Waste" (March 1995), which documents the characterization efforts carried out in response to milestone HLL 100 of DOE's Federal Facility Compliance Agreement (FFCA) with the Environmental Protection Agency, the predecessor to the FFCO. These efforts are discussed in Section 2.4 of the STP Background Volume. The results of these characterization efforts and the revised treatability group assignments will be included in the next update to the STP, and corresponding revisions will be submitted for your approval as appropriate.

To further strengthen this report, we have performed additional review and analysis to further characterize the wastes to meet the goals of Section 3.3 of the STP. Generator interviews included associated activities such as



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72

Benito Garcia

2

thorough reviews and summaries of the existing data. For some wastes, however, it was determined that a different, sometimes more aggressive approach was appropriate for properly characterizing the waste in addition to or in lieu of performing generator interviews. Alternative or supplemental approaches included physically examining the waste through either the Sort, Survey and Decontamination (SSD) process or visual examination (See Section 3.4.2 in the STP for further description of this activity). Some of the waste characterized through SSD will be removed from the low-level mixed waste inventory according to the process specified in Section V.B of the FFCO, and disposed as nonradioactive hazardous waste. In addition, some of the lead waste addressed in Section 3.3 of the STP was processed through the lead decontamination efforts recently completed to support the FFCA. The following table identifies the activities performed thus far to further characterize the 1,556 waste items addressed in Section 3.3 of the STP.

<u>Treatability Group</u>	<u>No. Items</u>	<u>Characterization Method</u>
Lead TBD		
LA-W924	21	Interviews and associated processes
	63	Lead decontamination
	49	Sort, Survey, and Decontamination
	36	Visual examination of waste
	17	To be sampled and analyzed
Mercury TBD		
LA-W925	29	Interviews and associated processes
	30	Sort, Survey, and Decontamination
	4	To be sampled and analyzed
Compressed Gases TBD		
LA-W926	10	Interviews and associated processes
Biochemical Lab Wastes		
LA-W927	3	Interviews and associated processes
	6	Sort, Survey, and Decontamination
Dewatered Treatment Sludges		
LA-W928	1,288	Interviews and associated processes, analyses, review of historical data

In addition to the 17 lead TBD items and four mercury TBD items which remain to be sampled and analyzed, 189 low-level mixed waste items requiring additional characterization were identified in the above-referenced March 1995 report. The sampling and analysis plan to complete this characterization, which will be submitted by January 30, 1996, is the next activity required by the FFCO to address wastes in this category (Activity 3.3B).

NOV 06 1995

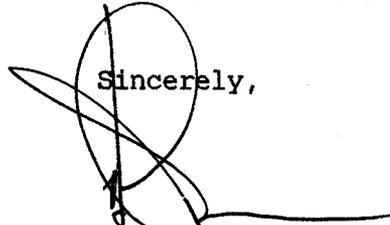
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3

As discussed in Section 3.3 of the STP Background Volume, extensive additional analyses and reviews have been performed of the 1,288 drums of dewatered treatment sludge in the legacy low-level mixed waste inventory. The results of these investigations will be documented for submittal to NMED in the near future.

A Certification Statement prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements," of the FFCO is enclosed herewith. We are available to discuss this information with you at any time. If you have any questions, please call me at (505) 665-5042.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

H. L. "Jody" Plum
Office of Environment and Projects

LAAMEP:2JP-019

Enclosure

cc w/enclosure:

J. Seubert

Hazardous and Radioactive

Materials Bureau

New Mexico Environment Department

2044 Galisteo St., Building A

P. O. Box 26110

Santa Fe, NM 87505

NOV 06 1995

Benito Garcia

4

bcc w/enclosure:

H. Haynes, Office of Counsel, LAAO

bcc w/o enclosure:

J. Mack, AAMEP, LAAO

D. Erickson, ESH-DO, LANL, MSK491

A. Gancarz, CST-DO, LANL, MS-J515

M. Devaurs, EM/WM, LANL, MS-J552

S. Brown, LC-GL, LANL, MS-A187

P. Schumann, ESH-19, LANL, MS-K498

ESH-19 (950557.PS), LANL, MS-K490

M. Williams, WMD, AL

CERTIFICATION

I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.

Micheline Devaurs
Micheline Devaurs
Project Manager, EM Division
Los Alamos National Laboratory
Operator

11/2/95
Date Signed

H.L. Plum
H.L. Plum
Regulatory Permitting and Compliance Manager
Los Alamos Area Office
U.S. Department of Energy
Albuquerque Operations
Owner/Operator

11/6/95
Date Signed