

LANL FFCO 97



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

JUN 17 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Garcia:

Subject: Site Treatment Plan Corrective Action Plan (STP-CAP), Federal Facility
Compliance Order (FFCO), February 14, 1997 Letter of Violation, Second
Status Update

The purpose of this letter is to update the New Mexico Environment Department (NMED) on the status of activities supporting the corrective action steps outlined in the April 4, 1997 STP-CAP, referenced above. The Department of Energy (DOE) and the University of California (UC) submitted this STP-CAP to address concerns raised in the referenced Letter of Violation issued to Los Alamos National Laboratory (LANL). Elements of the STP-CAP address each of the five violations noted in your letter.

Corrective action steps related to Issues 1, 2, and 3 were completed as follows:

Issue 1: "DOE and UC failed to provide NMED notification pursuant to Section XX.C.1 of the FFCO and meet the compliance date within the scheduled timeframe as set forth in the FFCO Site Treatment Plan Compliance Plan Volume (CPV) Section 3.1.1 Activity A. This violation is supported by facts outlined in a letter dated December 9, 1996 from DOE to NMED."

The STP-CAP identified two root causes of this occurrence and addressed each with a series of corrective action steps. The following four steps were anticipated to be completed by May 31, 1997 under root cause no. 2:



1853



Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Status
Inadequate Milestone Tracking	Implement computerized milestone tracking	Compile list of all fixed milestones and associated dates, including notification milestones	Solid Waste Operations Group	5/29/97
		Load all existing milestones into software system	Solid Waste Operations Group	6/2/97
		Test e-mail notification process	Solid Waste Operations Group	5/23/97
		Write procedure for operation and administration of software system and adding milestones, including the variable milestones (e.g., notification of receipt of waste at off-site facilities)	Solid Waste Operations Group	5/30/97

Issue 2: *"DOE and UC failed [to] meet the compliance date within the scheduled timeframe as set forth in the FFCO CPV, Section 3.4.2 'Activities for waste items in part 1 of this treatability group,' as amended October 30, 1996 (CPV Amendment 1.0 dated October 30, 1996). This violation was noted during a meeting held between the parties on January 27, 1997."*

The STP-CAP identified a root cause of this occurrence and addressed it with a series of corrective action steps. The following two steps were anticipated to be completed by May 31, 1997 under root cause no. 2:

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Status
Lack of Quality Assurance	Verify treatability group data in database	Compare data in database to paper list of items in each treatability group*	Solid Waste Operations Group	5/27/97
		Correct data in database as necessary	"	5/30/97

*Verification of Item Number

Issue 3: *"DOE and UC failed to provide NMED notification pursuant to Section XX.C.1 of the FFCO regarding waste received off-site within the scheduled timeframe as set forth in the FFCO CPV Section 3.1.1 Activity C [Provide documentation to NMED that waste was received at off-site facility with a milestone date of within 45 days after receipt of waste at treatment facility]. This violation is supported by facts outlined in a letter from DOE to NMED dated January 31, 1997 and was noted during a meeting between the parties held January 27, 1997."*

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Mr. Benito Garcia

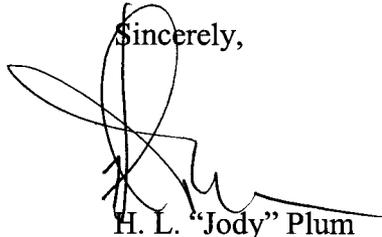
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The STP-CAP identified two root causes of this occurrence and addressed each with a series of corrective action steps. The final step under root cause no. 2 was incorrectly specified in the April 4, 1997 STP-CAP to have an anticipated completion date of April 30, 1997. As pointed out in our last status update, this step could not be completed until the associated procedure was completed (see fourth corrective action step under issue no. 1 above). This has now been done.

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Status
Determination of Date for Receipt of Waste	Implement notification of receipt of signed waste manifests	Include shipment notification milestones in written procedure for Computerized Milestone Tracking System	Solid Waste Operations Group	5/30/97

Thank you for the opportunity to provide this information regarding the LANL STP Corrective Action Plan. Please contact me at (505) 665-5042 or Mr. Ken Hargis at (505) 667-2347 if you have any questions.

Sincerely,



H. L. "Jody" Plum

Office of Environment and Projects

LAAMEP:9JP-055

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