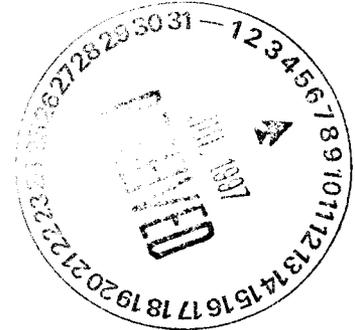


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Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

JUL 02 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Janice Archuleta
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505

Dear Ms. Archuleta:

Subject: Sort, Survey and Decontamination (SSD) Activities, Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO), October 4, 1995 - Confirmation of Completion of Activity 3.4.2 H and Status of Revision Requests

The purposes of this letter are (1) to confirm our previous notification to the New Mexico Environment Department (NMED) of completion of three required activities set forth in Rev. 3.0 of the FFCO (as discussed in our letter of February 28, 1997); (2) to document our discussions of June 24, 1997 regarding our pending requests for revision of the Site Treatment Plan (STP); and (3) to document our discussions of June 24, 1997 regarding other pending requests and correspondence.

Completion of STP Activity 3.4.2H

Compliance Plan Volume (CPV) Activity 3.4.2H requires that the Department of Energy (DOE) and the University of California (UC) "(S)ubmit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates" for the covered waste items in subgroup 3 of the treatability group for SSD, MWIR ID LA-W929, by June 30, 1997. We notified NMED of completion of our proposed reassignment of covered waste items in subgroup 3, and submitted the required documentation as part of our February 28, 1997 letter. No new compliance dates were requested for treatment of the reassigned SSD wastes. Our February 28, 1997 letter, therefore, constituted the notification required by Section XX of the FFCO.

Status of Revision Requests

Revision 4.0. The documentation assigning the referenced SSD items to Treatability Groups (TG) was enclosed with our February 28, 1997 letter as Revision Request No. 4. This revision request was prepared in order to: (1) assign the SSD items to TGs; (2) add new TGs (and modify the description of one existing TG) as deemed necessary to accommodate some of the affected waste items; and (3) modify the compliance dates for Activities 3.4.2 C and F to conform to existing



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Activity I. Specific text for our Revision 4.0 request was proposed in Enclosure A of our February 28, 1997 letter.

In NMED's March 5, 1997 letter, the following five questions and comments were raised regarding Revision 4.0:

1. Were compliance date extensions being requested for any of the TGs to which the SSD wastes were being moved? If so, how?

Response: No, the compliance date changes had been requested for LA-W929 only. Since Revision 4.0 has not yet been approved, they were not intended to apply to the TGs receiving LA-W929 wastes. However, our request to modify the Section 3.4.2 compliance dates is hereby withdrawn since the affected compliance dates are being met in accordance with Revision 3.0.

2. NMED requested that the Rev. 4.0 changes be included with the Rev. 5.0 changes.

Response: This will be done. They will be included in the electronic copy of the CPV currently in preparation at LANL to support this revision request.

3. NMED stated that the newly proposed TGs ("Labpacks" and "Explosives") must be added to Section 3.3 via the revision process.

Response: This will be done. They (and the name change proposed for TG LA-W923) will be included in the electronic copy of the CPV currently in preparation at LANL to support this revision request.

4. NMED suggested that DOE and UC submit an amendment to delay compliance with the April 30, 1997 compliance date.

Response: As stated above, our request to modify the Section 3.4.2 compliance dates is hereby withdrawn since the April 30, 1997 compliance date, in fact, was met in accordance with Revision 3.0. Thus, the amendment was not needed.

5. NMED requested a hard copy and disk copy of the CPV changes for this revision.

Response: This will be done. The editorial markings will be included in the hard copy and electronic copy of the CPV currently in preparation at LANL to support this revision request.

Revision 5.0. In our March 31, 1997 Revision 5.0 letter, DOE and UC requested to revise the CPV language to incorporate the changes in covered waste inventories (discussed in the LANL FY96 STP *Annual Update*, transmitted separately) into the CPV inventories, specifically the following:

1. Changes in Mixed Low-Level Waste (MLLW) covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY 1995, as reported in the FY 1995 *Annual Update*;
2. Changes in MLLW covered waste inventories during FY 1996, discussed in the FY 1996 STP *Annual Update*, and

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3. Changes to mixed transuranic waste inventories.

The Rev. 5.0 MLLW inventory changes for FY 1995 and FY 1996 will be consolidated with the Rev. 4.0 changes in the hard copy and electronic copy of the CPV currently in preparation at LANL to support this revision request.

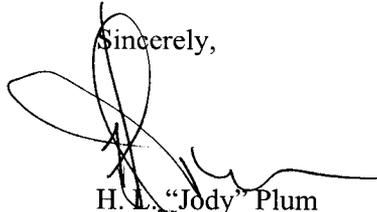
Revision 6.0. In addition to the Rev 4.0 and 5.0 changes, we propose to include several additional items in the hard copy and electronic copy of the CPV currently in preparation at LANL, constituting another revision request:

1. DOE and UC wish to incorporate their schedule for the development of lead processing techniques and options (originally submitted to NMED on June 26, 1996) into CPV Section 3.4.1, as discussed by NMED in its February 25, 1997 letter.
2. Several additional covered wastes for which expeditious treatment opportunities are desired (including several legacy gas cylinders and environmental restoration-related waste streams) will be submitted for incorporation into appropriate TGs.

A Certification Statement is provided as an enclosure. As we discussed in our June 24, 1997 meeting, proposed Revision 4.0, 5.0, and 6.0 CPV changes will be submitted under separate cover for NMED's approval in a single, consolidated package in hard copy and electronic copy format, as soon as they have been completed. Other items discussed at the meeting will be addressed under separate cover.

Thank you again for meeting with us regarding these issues. Please contact me at (505) 665-5042, or Ken Hargis at (505) 667-2347 if you have any questions.

Sincerely,



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

LAAMEP:9JP-060

Enclosure

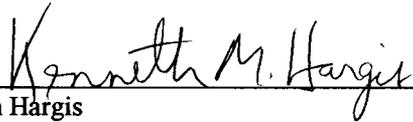
cc w/enclosure:

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

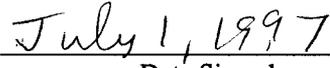
CERTIFICATION

SORT, SURVEY AND DECONTAMINATION (SSD) ACTIVITIES, LOS ALAMOS NATIONAL LABORATORY (LANL) FEDERAL FACILITY COMPLIANCE ORDER (FFCO), OCTOBER 4, 1995 - CONFIRMATION OF COMPLETION OF ACTIVITY 3.4.2 H AND STATUS OF REVISION REQUESTS

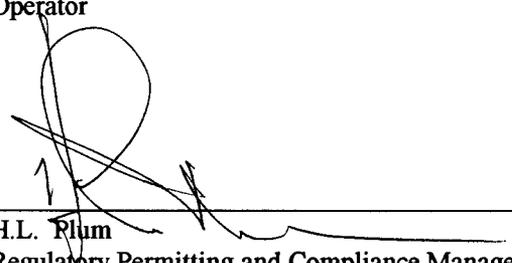
I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



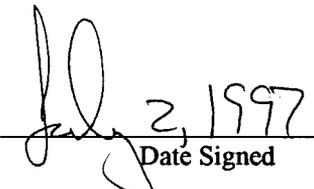
Ken Hargis
Manager of Operations
Waste Management Program
Environmental Management Programs
Los Alamos National Laboratory
Operator



Date Signed



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



Date Signed