

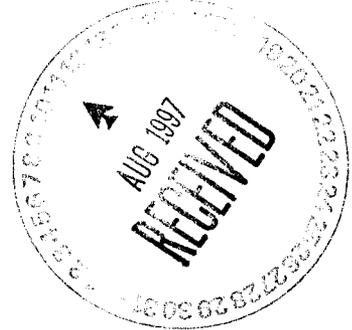
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Janice



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

AUG 07 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Ms. Archuleta:

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

Six corrective action steps related to Issues 1, 2, and 3 were anticipated to be completed by July 31, 1997.

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 time frame 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."*

Issue 2: *"DOE and UC failed [to] meet the compliance date within the scheduled time frame 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."*

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 time frame 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."*

RED LANL FFCO/97

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Ms. Janice Archuleta

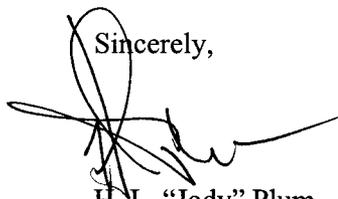
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The STP-CAP identified the root causes of these occurrences and addressed each with a series of corrective action steps. The following six steps were anticipated to be completed by July 31, 1997, under the following root causes, for Issues 1, 2, and 3.

Cause	Corrective Action Title	Corrective Action Steps	Responsible Organization	Status
Undesignated Responsibility	Update LANL's STP Implementation Plan	Responsible organizations assign roles to personnel and implement Plan	Appropriate organizations	Completed on 7/31/97
Undesignated Responsibility; Lack of Quality Assurance	Formalize LLMW work-off process	Develop written procedure for work-off of LLMW	Solid Waste Operations Group	Completed on 7/22/97
		Identify roles of personnel in work-off process	Solid Waste Operations Group	Completed on 7/22/97
		Assign responsibility for applicable milestones and notifications; verification of lists of items and item data; data quality; quality assurance; and notification of shipments and receipt of waste to specific personnel	Solid Waste Operations Group	Completed on 7/22/97
		Formalize and verify the queries used to determine data submitted to NMED	Solid Waste Operations Group	Completed on 7/22/97
		Conduct formal on-the-job training for this procedure	Solid Waste Operations Group	Completed on 7/31/97

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:3JP-051

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