



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



JUN 30 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael Taylor
 FFCO Project Manager
 Hazardous and Radioactive Materials Bureau
 New Mexico Environment Department
 2044 Galisteo St., Building A
 P. O. Box 26110
 Santa Fe, NM 87505

Dear Mr. Taylor:

Subject: Site Treatment Plan (STP), Compliance Plan Volume (CPV), Milestone Activity 3.3.1 (E), Los Alamos National Laboratory (LANL), Federal Facility Compliance Order (FFCO), October 4, 1995

The purpose of this letter is to submit Amendment Proposal 3.0 to the CPV. As discussed in our April 20, 1999 letter and in our subsequent meeting on June 11, 1999, the enclosed Amendment Proposal addresses waste items currently in one Treatability Group "*Lead for Surface Decontamination*," MWIR Waste IDs LA-W930-0 and LA-W930-5.

In our April 20, 1999 letter, the Department of Energy (DOE) and the University of California (UC) stated that out of the 151 items in this treatability group, 15 items were found to be not amenable to decontamination. Twelve of the 15 items have been accepted for off-site treatment and disposal. DOE and UC are requesting in the Amendment Proposal that the remaining 3 of the 15 items be transferred to the Mixed Transuranic (MTRU) category.

As discussed previously, DOE and UC are also requesting in the Amendment Proposal that the last item, which is a very large glovebox, be transferred within the same treatability group to subgroup LA-W930-6. Transfer of this one item will allow DOE and UC to pursue on-site decontamination which has been previously approved as Milestone Activity 3.3.1 (G). The Milestone Activity completion date for this activity in the CPV is December 2, 1999.



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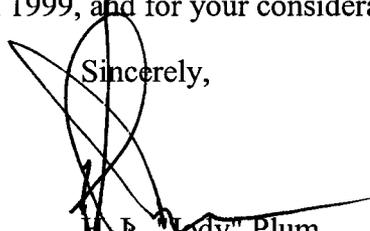
Michael Taylor

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DOE and UC are requesting your response concerning the enclosed Amendment Proposal before the July 31, 1999 Milestone Activity completion date for waste items in the Treatability Group, "*Lead for Surface Decontamination*," MWIR Waste IDs LA-W930-0 and LA-W930-5. Included as Enclosure B is the redline, strikeout version of the CPV. Included as Enclosure C is the clean copy version of the CPV. A Certification Statement prepared in accordance with the requirements of Section XX, "*Documents, Information and Reporting Requirements*," of the FFCO, is included Enclosure D. Also enclosed is a copy of the proposed CPV text on diskette.

We are available to discuss this information with you at any time. If you have any questions, please call me at (505) 665-5042 or Beverly Martin at (505) 665-0714. Thank you for meeting with us on June 11, 1999, and for your consideration of this proposal.

Sincerely,



M. E. "Jody" Plum
Office of Environment

LAAME:6JP-140

Enclosures

ENCLOSURE A
AMENDMENT PROPOSAL

ENCLOSURE A
LOS ALAMOS NATIONAL LABORATORY SITE TREATMENT PLAN
PROPOSED AMENDMENT 3.0

LOS ALAMOS NATIONAL LABORATORY
FEDERAL FACILITY COMPLIANCE ORDER

The purpose of this amendment proposal is to request the transfer of the items described below into more appropriate treatability groups. The changes proposed by this amendment to the CPV will allow the covered waste to be treated or otherwise managed in accordance with the Activities and Compliance Dates as adopted or revised herein. The CPV text changes are indicated in the redline, strikeout version provided in Enclosure B. The revised CPV "clean copy" text is provided as Enclosure C.

Section XI.B.2.a. Federal Facility Compliance Order (Los Alamos National Laboratory): Detailed description of the proposed amendment.

The Department of Energy (DOE) and the University of California (UC) are proposing to revise the Compliance Plan Volume text to reflect the following change in the MLLW covered waste inventory

- Transfer of one item (4.25 cubic meters) within the same Treatability Group, "*Lead for Surface Decontamination*," MWIR Waste ID W930-5 to subgroup MWIR Waste LA-W930-6.
- Transfer of 3 items (11.42 cubic meters) from Treatability Group, "*Lead for Surface Decontamination*," MWIR Waste ID LA-W930-5 to the Mixed Transuranic (MTRU) category.

Section XI.B.2.b. Federal Facility Compliance Order (Los Alamos National Laboratory): Rationale for the proposed amendment.

As of Revision 5.0, there were 151 items in Treatability Group, "*Lead for Surface Decontamination*," MWIR Waste IDs LA-W930-0 and LA-W930-5. Seventy-five items have been decontaminated on-site prior to December 2, 1998, 60 items have been shipped off-site for decontamination and recycling, and 15 items have been found to be not amenable to decontamination. Twelve of the 15 items have been accepted for off-site treatment and disposal. Three items are proposed for transfer to the MTRU category based upon radioactive assay results.

The one remaining item is a very large glovebox. The quantity of radioactivity in the material making up this glovebox has recently been determined to be too high for off-site shipment. The only remaining option is for on-site decontamination. The milestone for completing on-site decontamination for items in the treatability group, "*Lead for Surface Decontamination*," MWIR Waste IDs LA-W930-0 and LA-W930-5, was December 2, 1998. DOE and UC are proposing to transfer this item within the same treatability group to subgroup LA-W930-6, in order to pursue on-site decontamination. The on-site decontamination activity has been previously approved for the 14 items currently in treatability group MWIR Waste ID LA-W930-6 with a CPV Milestone Activity 3.3.1 (G) completion date of December 2, 1999.

Section XI.B.2.c. Federal Facility Compliance Order (Los Alamos National Laboratory): Anticipated length of any delay in performance.

No delay in performance is anticipated.

Section XI.B.2.d. Federal Facility Compliance Order (Los Alamos National Laboratory): Plan and schedule for implementing all reasonable measures

No delay in performance is anticipated.

ENCLOSURE B
PROPOSED COMPLIANCE PLAN
VOLUME
REDLINE, STRIKEOUT VERSION

3.3.1 Lead Decontamination

Treatability Group(s):

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m ³)	No. Items	Net volume (m ³)	No. Items	Net volume (m ³)
lead for surface decontamination	LA-W930-0	0	0.00	40	37.81	40	37.81
	LA-W930-5			36	22.14	36	22.14
Totals		0	0.00	40 36	37.81 22.14	40 36	37.81 22.14

Note: See below for additional wastes in this treatability group

Treatment:

This treatability group contains two categories of lead for decontamination:

- The first category is lead in the original LA-W930-0 inventory that is amenable to decontamination in the on-site lead decontamination trailer, which was designed to decontaminate simple lead shapes, such as lead bricks, of certain physical dimensions. The trailer is on-site and has operated, but needs an upgrade for prolonged operation.
- The lead in the second category is lead in the original LA-W930-0 inventory that is not amenable to decontamination in the on-site lead decontamination trailer, plus subsequent additions to the original inventory shown in Appendix B. This lead will be processed using other on-site decontamination processes, such as dry sandblasting or hand-scrubbing, or sent to off-site lead decontamination services.

Any lead not acceptable for on-site or off-site lead decontamination, plus any lead unsuccessfully decontaminated, will be designated for treatment and disposal at an off-site facility, or for recycle through an off-site capability, such as metal melting to create shielding blocks or a DOE lead bank. Non-conforming items will be reassigned to appropriate treatability groups in accordance with the FFCO.

Should DOE decide to treat or recycle waste at an off-site non-commercial facility in lieu of plans to treat or recycle such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment/recycle option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment/recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment/recycling site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility.

Lead shapes and forms in the first category.

Activity	Compliance Date
A. Complete lead decontamination	09/30/97

Lead shapes and forms in the second category.

Activity	Compliance Date
A. Provide schedule for development of lead processing techniques and options	06/30/96
B. Segregate lead waste into decontamination groupings	07/31/97
C. Complete shipment of wastes to decontamination operations, or	12/02/98

D. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/98
E. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/99
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

Additional wastes.

The following additional wastes will require management in the second category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m ³)	No. Items	Net volume (m ³)	No. Items	Net volume (m ³)
lead for surface contamination	LA-W930-6	0	0.00	14 15	12.06 16.31	14 15	12.06 16.31
Totals		0	0.00	14 15	12.06 16.31	14 15	12.06 16.31

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Date
G. Complete shipment of wastes to decontamination operations, or	12/02/99
H. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/99
I. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/00
J. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

**CPV APPENDIX A.
HISTORY OF STP REVISIONS AND AMENDMENT.**

As discussed in CPV Section 1.3, the STP Compliance Plan Volume has been modified several times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. This Appendix provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

To date, there have been nine revisions and ~~two~~ three amendments to the CPV. In addition, the FFCO was amended once, on May 20, 1997. The following Table A-1 provides a summary of these changes. More detailed descriptions can be found in the CPV Update portion of each year's STP *Annual Update*, and the original correspondence requesting each change.

Table A-1. SUMMARY OF CHANGES TO THE CPV AND THE FFCO.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CPV	6/12/96	Added off-site treatment as a parallel preferred option for most MLLW treatability groups
Rev. 2.0	STP/CPV	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW
Amendment 1.0	STP/CPV	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Rev. 3.0	STP/CPV	1/27/97	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Amendment 1.0	FFCO	5/20/97	Modified FFCO Sections IV, V, IX, and X to streamline waste transfers and deletions
Amendment 2.0	STP/CPV	9/4/97	Extended CPV Activity 3.1.2B Compliance Date to 12/29/97
Rev. 4.0	STP/CPV	12/29/97	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added treatability groups, and deleted treated items
Rev. 5.0	STP/CPV	12/29/97	Added volumes reported in FY95 and FY96 <i>Annual Updates</i> (and certain other items) to several treatability groups, added Activities and Compliance Dates, added CPV Appendices, and deleted treated items
Rev. 6.0	STP/CPV	7/31/98	Added volumes reported in FY97 <i>Annual Update</i> to several treatability groups, added certain Activities and Compliance Dates, adjusted several original inventory volumes, transferred one LA-W929 item to a new treatability group, and deleted treated items
Rev. 7.0	STP/CPV	11/30/98	Removed on-site treatment skids, added STP inventory items, added on-site recycling/re-use and radiological decontamination, added notification for off-site treatability studies,
Rev. 8.0	STP/CPV	12/3/98	Extended compliance dates for treatment of MTRU waste.

LANL CPV
Proposed Amendment 3.0
June 1999

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 9.0	STP/CPV	<i>to be added</i>	Added and deleted volumes reported in FY98 <i>Annual Update</i> to certain treatability groups
Amendment 3.0	STP/CPV	<i>to be added</i>	Transferred three items to MTRU, transferred one item to subgroup within same treatability group.

ENCLOSURE C
PROPOSED COMPLIANCE PLAN
VOLUME
CLEAN COPY VERSION

3.3.1 Lead Decontamination

Treatability Group(s):

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m ³)	No. Items	Net volume (m ³)	No. Items	Net volume (m ³)
lead for surface decontamination	LA-W930-0 LA-W930-5	0	0.00	36	22.14	36	22.14
Totals		0	0.00	36	22.14	36	22.14

Note: See below for additional wastes in this treatability group

Treatment:

This treatability group contains two categories of lead for decontamination:

- The first category is lead in the original LA-W930-0 inventory that is amenable to decontamination in the on-site lead decontamination trailer, which was designed to decontaminate simple lead shapes, such as lead bricks, of certain physical dimensions. The trailer is on-site and has operated, but needs an upgrade for prolonged operation.
- The lead in the second category is lead in the original LA-W930-0 inventory that is not amenable to decontamination in the on-site lead decontamination trailer, plus subsequent additions to the original inventory shown in Appendix B. This lead will be processed using other on-site decontamination processes, such as dry sandblasting or hand-scrubbing, or sent to off-site lead decontamination services.

Any lead not acceptable for on-site or off-site lead decontamination, plus any lead unsuccessfully decontaminated, will be designated for treatment and disposal at an off-site facility, or for recycle through an off-site capability, such as metal melting to create shielding blocks or a DOE lead bank. Non-conforming items will be reassigned to appropriate treatability groups in accordance with the FFCO.

Should DOE decide to treat or recycle waste at an off-site non-commercial facility in lieu of plans to treat or recycle such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment/recycle option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment/recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment/recycling site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility.

Lead shapes and forms in the first category.

Activity	Compliance Date
A. Complete lead decontamination	09/30/97

Lead shapes and forms in the second category.

Activity	Compliance Date
A. Provide schedule for development of lead processing techniques and options	06/30/96
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F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

Additional wastes.

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		No. Items	Net volume (m ³)	No. Items	Net volume (m ³)	No. Items	Net volume (m ³)
lead for surface contamination	LA-W930-6	0	0.00	15	16.31	15	16.31
Totals		0	0.00	15	16.31	15	16.31

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Date
G. Complete shipment of wastes to decontamination operations, or	12/02/99
H. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/99
I. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/00
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LANL CPV
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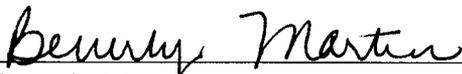
ENCLOSURE D
CERTIFICATION STATEMENT

ENCLOSURE D

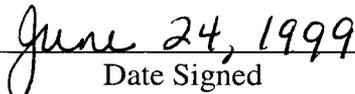
CERTIFICATION

**SITE TREATMENT PLAN (STP)
AMENDMENT PROPOSAL 3.0
LOS ALAMOS NATIONAL LABORATORY (LANL)
FEDERAL FACILITY COMPLIANCE ORDER (FFCO)
OCTOBER 4, 1995**

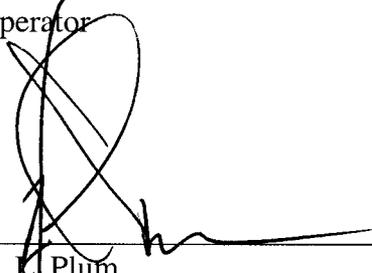
I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



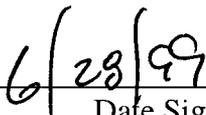
Beverly Martin
Project Leader
Waste Management Program
Environmental Management Programs
Los Alamos National Laboratory
Operator



Date Signed



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



Date Signed