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May 16, 1994

Diana Webb, LAAO AIP
Point of Contact
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

RE: **April 19, 1994 Meeting regarding letter from K. Sisneros to J. Bellows dated 3/18/94**

Dear Ms. Webb:

This letter is to inform you regarding a meeting held as described above.

The objective of this meeting was to discuss in broad outline what the technical concerns of the AIP were as expressed in the letter from Kathleen Sisneros to Jerry Bellows. At issue is the long-term adequacy of pit and shaft storage of TRU-waste (as well as possible mixed wastes) at Technical Areas (TA) 54 and 49 and 50.

Attending:

Jon Mack, DOE	Cort Fesmire, DOE
Robin Reynolds, LANL	Juan Corpion, LANL
Tracy Glatzmaier, LANL	Bruce Swanton, NMED
Bob Gilkinson, LANL contractor	Chris Hanlon-Meyer, NMED
Ines Triay, LANL	Steve Yanicak, NMED
John Kruger, LANL	Mary Perkins, NMED

Following are the main points made during the discussion.

Kruger: ES&H-8 is conducting a performance assessment (PA), one objective of which is to determine the capability of the TRU-waste burial units to sequester their contents over a period of hundreds to thousands of years. This effort includes an assessment of canyon retreat rates. Delivery to DOE is due in December of 1994.

It was suggested that representatives of the ER group attend PA planning/discussion meetings.

Glatzmier: The RCRA Facility Investigation Workplan's (RFIW) are

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documents which aim to describe the assessment of HSWA sites, not to detail concerns like the one under discussion, so it is not surprising that [RFIW's for 1044 and 1048] do not consider the question of the geological stability of the mesas, e.g. at TA-54.

Corpion: Note that radioactive wastes of higher concentration, the real concern in the Area G pits and shafts, were emplaced between 1957 - 1970. After this time wastes designated as TRU-wastes have all been retrievably emplaced (e.g., pad storage at Area G). Wastes disposed of in Area G after this date are less than 100 nCi/g. Prior to 1957 MDA C at TA-50 received similar wastes as did MDA's B, A and T. The regulatory issues relative to these wastes are that if wastes had to be removed from the pit or shaft disposal units and this waste was determined to be mixed waste it would fall under state RCRA jurisdiction. If the waste remains in the units it will fall under Subpart S proposed regulations which will require that it be determined if a release has occurred and if so the rate and extent issue.

Kruger: DOE Order 5820.2A, which requires the Performance Assessment, has also driven setting up Peer Review Panels which are currently discussing issues of long term storage of such wastes.

Swanton summarized the AIP's technical concerns as follows:

1. What is the long-term stability of the units which contain these extremely long-lived rad wastes? AIP is most interested at this time in MDA's at Area G, TA-54 and MDA C at TA-50.
2. At TA-49, is the lead in DT-5A an indication of release from the hydronuclear TRU-waste storage shafts? AIP is urging that timed pumping tests as proposed last fall by LANL technical staff be done this field season.
3. Determination should be made of 1) how long the units at TAs 54 and 50 (MDA C) will reliably sequester their wastes from the environment, and 2) given a conservative estimate of when this will occur, what will the radioactive burden be in the units at that time and what effect would release of this rad burden have on human health and the environment.

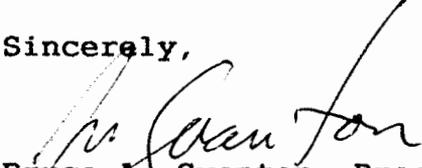
We would like to be informed regarding the membership of the Peer Review Panel appointed to study the disposition of TRU- and possibly mixed wastes at the sites discussed and to be included in information exchanges between this body and contacts at LANL or LAAO. Likewise, we would like to be kept informed regarding any plans for the timed pumping tests at DT-5A and other wells

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downgradient of TA-49, including any initiatives designed to promote a timely implementation of such studies.

If you have any questions regarding these matters, please contact me at (505) 672-0447.

Sincerely,



Bruce A. Swanton, Program Manager
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cc:

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