

General

Charlie -
my routing file
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March 27, 1995

Post-it® Fax Note	7671	Date	3/27/95	# of pages	2
To	Elizabeth Withers		From	Benito J. Garcia	
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Phone #	667-2690		Phone #	827-4358	
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PIS CALL to CONFIRM Receipt -

Ms. Elizabeth Withers
U.S. Department of Energy
Los Alamos Area Office
Office of Environment and Projects
Los Alamos, New Mexico

Dear Ms. Withers:

Thank you for the third submittal of the DPE/EA-0969 document to the New Mexico Environment Department for review. The other two transmittals apparently were either not received or otherwise not accounted for in my office.

After review of your faxed transmittal of the Environmental Assessment (EA) Accelerator Laboratory (LEAL) Project, I offer the following comments:

1. The document, in total, appears to address the major areas required by an environmental assessment under the National Environmental Policy Act (NEPA). New Mexico has no formal role in this process but appreciates being allowed the opportunity to comment. The state would like to be involved in reviews of future EA's or Environmental Impact Statements (EIS) relevant to your facility to include the forthcoming Sitewide Environmental Impact statement from which LEAL will be excluded.
2. The LEAL EA in several places refers to the proposed LEAL facility/building location within TA-53 as a "disturbed site". There is no clear or specified meaning as to this description of the proposed facility/building location within TA-53. This should be clarified..
3. Statements within the EA state that the only generated low-level radioactive waste will be the beam stop when removed from a cooling chamber. It is unclear as to whether or not activation products and perhaps short



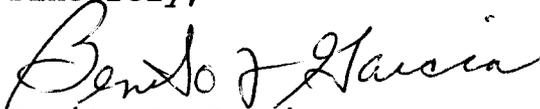
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lived radioactive materials will be created and how they will be dealt with after creation. If the converse is true, that radioactive materials will be impacted with the photon beam to attempt to transmute radioactive materials to stable isotopes and non radioactive materials, this needs to be clarified. Also unclear is whether or not the beam stop and potentially radioactive materials will be in contact with the cooling chamber or whether the cooling chamber maintains integrity from cooling fluids which do not contact the beam stop or other potentially radioactive materials. If the cooling fluids are potential candidates for radioactive material contamination prior to discharge to the outfall, this should be addressed.

4. The EA in several places addresses the low probability of fatal cancers. Is there a need to address probabilities of non-fatal concerns in the EA? If so, some statements should be made on non-fatal cancers on a relative risk basis, e.g. comparison to smoking, radon, asbestos etc.
5. The EA states that the LEAL will produce no radioactive air emissions. This should be expanded to explain the difference between particulates (radioactive) not being emitted versus the emission of high energy x-rays and associated radiations being dissipated in air after photon interactions with target material.
6. The EA refers to the New Mexico Environment Department as the Division in Section 6.0 Permits, this should be corrected.

Thank you for allowing these short comments at this late date. Again, I apologize for the loss of the previous two documents. Should you have questions on these comments, please contact me at (505) 827-4358 at your convenience.

Sincerely,



Benito J. Garcia
Bureau Chief
Hazardous & Radioactive Materials Bureau

BJG:cj

cc: Larry Kirkman, Manager, LAAO
Ed Kelley, Ph.D., Director, WWMD, NMED