



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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*Barbara -
may be relevant
to Susan's
recommendation*

AUG 20 1996



Mr. Benito Garcia, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
2044A Galisteo Street
Santa Fe, NM 87505

**Re: Risk-Based Corrective Action Process
Los Alamos National Laboratory (NM0890010515)**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed Los Alamos National Laboratory (LANL) response, dated June 27, 1996, to NMED/EPA comments on the Risk-Based Corrective Action Process document. The response adequately addressed all of EPA's concerns except for one. LANL argues that they do not need to calculate carcinogenic risk due to radiation and will clean-up radiation against a dose standard of 10 milli-rem per year (mrem/yr).

Although it is appropriate to manage carcinogenic risk for radioactivity against dose for clean-up of radioactive materials purposes, it is also important to calculate carcinogenic risk due to radioactive materials for risk management purposes. At a dose of 10 mrem/yr, the background carcinogenic risk is approximately 10^{-3} . This background risk is extremely important information for a risk manager to assist in making decisions on clean-up levels of RCRA regulated carcinogenic chemicals of concern. For example, if background risk (risk from radioactivity) for a site is 10^{-3} , then cleaning up RCRA regulated carcinogenic contaminants to levels between 10^{-4} and 10^{-6} will not decrease overall site risk. Alternatively, the background risk may be in the range of 10^{-6} , and a cleanup of RCRA contaminants to lower levels might be appropriate. Knowing risk due to background is therefore, extremely important in making risk management decisions.

Should you have any questions, please feel free to contact Mr. Jeff Yurk at (214) 665-8309.

Sincerely,

David W. Nezeigh
David W. Nezeigh, Chief
New Mexico and Federal
Facilities Section



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*GEN/mll/g
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