

JK



University of California  
Environmental Restoration Project, MS M992  
Los Alamos, New Mexico 87545  
505-667-0808/FAX 505-665-4747



U. S. Department of Energy  
Los Alamos Area Office, MS A316  
Environmental Restoration Program  
Los Alamos, New Mexico 87544  
505-667-7203/FAX 505-665-4504

FILE LANL HSWA GEN/MRKB/W

Date: December 20, 1996  
Refer to: EM/ER:96-636

Mr. Benito Garcia  
NMED-HRMB  
P.O. Box 26110  
Santa Fe, NM 87502

**SUBJECT: MINUTES FOR MONTHLY MEETING WITH HRMB**

Dear Mr. Garcia:

Enclosed please find a copy of the minutes pertaining to the Environmental Restoration (ER) portion of the meeting held in Santa Fe on November 21, 1996, with members of your staff, and personnel from Los Alamos National Laboratory's ER Project and Waste Management Permitting Program. The minutes have been reviewed by your staff and their comments have been incorporated. Also included is a flow diagram depicting discussions and drawings developed during this work session.

Should you have any questions, please call Dave at (505) 667-0819 or Bonnie at (505) 665-7202.

Sincerely,

David McInroy, Compliance Manager  
LANL/ER Project

Sincerely,

Bonnie Koch, Compliance Manager  
DOE/LAO

DM/BK/ss

Enclosure: November 21, 1996, Minutes for Monthly Meeting with HRMB

2



Cy (w/ enc.):

J. Ellvinger, ESH-19, MS K490  
P. Shanley, ESH-19, MS K498  
T. Glatzmaier, DDEES/ER, MS M992  
D. Griswold, AL-ERD, MS A906  
W. Hansen, EES-15, MS J495  
J. Jansen, EM/ER, MS M992  
B. Koch, LAAO, MS A316  
D. McInroy, EM/ER, MS M992  
T. Taylor, LAAO, MS A316  
T. Todd, LAAO, MS A316  
RPF, MS M707

M. Chacon, NMED-HRMB  
T. Davis, NMED-HRMB  
R. Dinwiddie, NMED-HRMB  
R. Ford-Schmed, NMED-OB  
K. Hill, NMED-HRMB  
S. Hoines, NMED-HRMB  
J. Kieling, NMED-HRMB  
T. Michael, NMED-OB  
J. Rogers, NMED-GWQB  
S. Zappe, NMED-HRMB

Cy (w/o enc.):

R. Sena, AL-ERD, MS A906  
T. Baca, EM, MS J591  
EM/ER File, MS M992

**NMED HRMB and LANL ER Project  
Meeting Minutes**

**November 21, 1996**

**Attendees:**

**NMED/EPA:** Teri Davis, Kim Hill

**LANL:** Bonnie Koch, Dave McInroy, Pat Shanley (ATK)

**NMED Comments on the RFI Accelerated Logic Process**

The group revisited the progress made on November 13, 1996 and continued reviewing the "process."

The process was altered per New Mexico Environment Department's (NMED's) comments. The major changes occur in the last leg of the process where the voluntary corrective action (VCA) process starts.

NMED prefers the following:

Insertion of a "VCA screen" box. This box will require that a screen or review be performed for the units where accelerated action will be conducted. If the accelerated action fits within the VCA Document of Understanding (DOU) criteria, proceed with VCA. The criteria for the July 90 proposed Subpart S should also be met, according to NMED.

Sites which do not fit the VCA should be brought to NMED's attention. NMED will determine which plans they would want to review and approve. It was acknowledged that this review and approval process could slow down the process. To enhance NMED's decision making process, a suggestion was made to familiarize NMED with proposed accelerated actions for each site by preparing a one-page overview of the site and touring NMED at the site. It was suggested that accelerated cleanups be addressed in groups, to conserve time and to not present an overwhelming amount of accelerated actions which NMED has to review. NMED's decisions and/or actions can be explained during an informal public meeting. This approach should allow for the "upfront" involvement of NMED and the public. For those units which NMED believes require regulatory oversight Los Alamos National Laboratory (LANL) will submit a plan to NMED for review and approval. NMED indicated they did not want to slow down the process, and a turnaround time may be established. If LANL has not heard from NMED in this time frame, LANL may choose to implement the plan (i.e., proceed at risk). LANL will also submit the plans for those sites which NMED has indicated they do not need to provide prior approval. NMED will be updated on these accelerated actions by the Project Tracking System report. NMED indicated they required copies of all documents as part of their public function.

Completion of the accelerated action will result in a report. LANL will submit a permit modification request after NMED approves the report. LANL will submit informational copies of the accelerated action reports for sites which are rad only or are not on the permit. LANL expects to proceed with such actions unless NMED determines the potential release site belongs in the permit. LANL will always seek to provide additional information prior to NMED adding a unit to the permit due to the cost and time involved in permit modifications.

NMED also suggested expanding the RFI/CMS/CMI process on the flow diagram to make apparent where NMED will have oversight and when reports are necessary.

Several issues remain, such as:

What constitutes a major versus minor change in a plan (e.g., RFI work plan)? Criteria for these must be established.

What is an acceptable turn-around time for NMED review of accelerated plans?

LANL participants agreed to bring the revised approach back to LANL for comment. LANL will be prepared to address their comments to the revised approach at the next meeting.

Related Topics:

NMED indicated that the following topics would be of interest to them in upcoming meetings:

- RFI Work Plan, Los Alamos and Pueblo Canyon
- PRS 39-001 (a and b)
- PRS 36-001, Interim Action
- PRS 15-004 (g)
- PRS 15-006 (c)
- PRS 39-002(a) Expedited Cleanup Plan
- Site Wide Hydrogeologic Work Plan
- Canyons Core Document
- Status of TA-18 UST
- TA-18 RFI Report, October 1995
- TA-15 RFI Reports
- PRSs 15-007(c) and 15-008(b) and (c) Interim Action Reports
- PRSs 018-003 (a-d)
- TA-35, All PRSs
- TA-39, All PRSs

NMED indicated that the upcoming Statement of Basis (SOB) looks like it will add up to 130 units to the permit. Dave McInroy expressed concern that NMED would add units to the permit without giving LANL the opportunity to provide additional data or

documentation for units which have been requested to be removed from the permit. LANL indicated the preference of receiving an NOD on the permit modification request or wording in the SOB that would allow LANL to provide comments during NMED's public comment period.

# Accelerated RFI Process

