

General



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

February 4, 1997

Mr. G. Thomas Todd, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

**RE: Comments Regarding the Progress Tracking System Report
Los Alamos National Laboratory
NM0890010515**

Dear Mr. Todd:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department has reviewed the Progress Tracking System monthly report and compared it to the Quarterly Report required under Module VIII of Los Alamos National Laboratory's (LANL) Resource Conservation and Recovery Act Operating Permit. In order for the PTS Report to meet the requirements of Module VIII and be an adequate substitute for the Quarterly Report, LANL should make the following adjustments to the PTS Report:

- improve the consistency in terminology (final, draft, etc.), provide definitions of these terms, and ensure that a document is identified in each milestone where appropriate;
- require the identification of specific PRSs in the Milestones section of the report;
- ensure Category 1 Milestones provide adequate explanations and that records within the Category field are not left blank;
- standardize the pool of "Titles" in the Milestone section of the report such that the activity, PRS, and action are consistent;



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- expand on the information presented under the Voluntary Corrective Actions and other accelerated cleanups/actions;
- require a higher level of QA on the PTS Report such that the level of QA is equivalent to that of the quarterly report;
- identify within the PTS report those items where DOE/LANL awaits NMED responses and vice versa; and
- tabulate the information providing divisions between Field Units.

LANL should also add the following categories to the PTS Report:

- Best Management Practices
- Field Sampling Activities (start, finish, delayed, etc.)
- Release Notifications Issued (PRS-related, WQCC 1203, etc.)
- Compliance Date
- Updated Replan sorted by Field Unit and PRS (placed behind each tabulated Field Unit section of the PTS)

HRMB would like the opportunity to discuss this matter further and recommends that the topic of the PTS Report be added to the next Environmental Restoration/NMED monthly meeting agenda.

Should you have any questions regarding this letter, please contact me or Mr. John Kieling, HRMB's LANL Facility Manager, at (505) 827-1558.

Sincerely,



Robert S. ("Stu") Dinwiddie
RCRA Permits Management Program

RSD:kth

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cc: T. Davis, NMED HRMB
B. Garcia, NMED HRMB
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J. Jansen, LANL ER, MS A316
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