



Department of Energy
 Albuquerque Operations Office
 Los Alamos Area Office
 Los Alamos, New Mexico 87544

SEP 17 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Barbara Hoditschek
 Surface Water Quality Bureau
 New Mexico Environment Department
 1190 St. Francis Drive
 P. O. Box 26110
 Santa Fe, NM 87502

Dear Ms. Hoditschek:

Subject: New Mexico Environment Department (NMED) Surface Water Quality Bureau
 (SWQB) Request Regarding the AP 4.5 Review Process

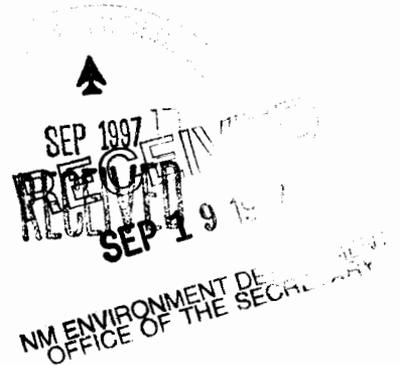
The purpose of this letter is to respond to Dr. Ed Kelley's letter, dated August 27, 1997, which was received by the U. S. Department of Energy (DOE) on September 5, 1997.

The NMED letter of August 27, 1997, refers to the original list of 668 sites. Our records show that our "agreed-upon" list actually includes 741 sites. DOE and the University of California (UC), owner and co-operators of Los Alamos National Laboratory, have committed to completion of the AP 4.5 Review Process for these 741 Potential Release Sites (PRS) by the end of December 1997.

As suggested in the NMED letter of August 27, the Field Survey Work (Part B) is substantially ahead of schedule and is now approximately 70 percent complete. Our goal is to complete all field survey work for the 741 sites by November 30, 1997. If possible, we will also complete the field surveys for the additional 148 sites, requested in your letter of August 27, by November 30, 1997, depending on work controls, i.e., health and safety concerns imposed by facility managers, and upon weather conditions. The difficulty completing the additional 148 sites is that these sites were not included in our original planning and it will be necessary to redo the work control documentation and schedule visits to technical areas which have already been visited.

In reference to completing the Constituent Assessment (Part A) and Proposed Actions (Part C) of the AP 4.5 Review Process, please note that this work is to be completed primarily by the Field Unit Project Leaders (FPL) and their staffs. As previously discussed, the FPLs have "end of the fiscal year" commitments and are not able to devote significant time to the AP 4.5 Review Process until after October 1, 1997. Again, DOE and UC are committed to completion of the AP 4.5 Review Process, including Part A and Part C for the original 741 PRSs by the end of December 1997. Completion of Part A and Part C for the additional 148 sites will be accomplished as soon as possible after completion of our original commitment. The estimated completion date is by the end of February 1998.

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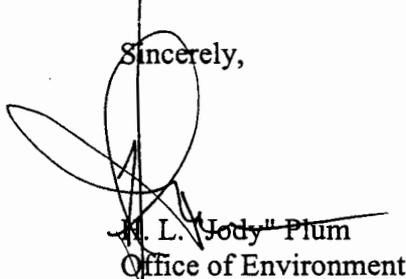
In the NMED letter of August 27, a schedule was requested for the completion of the AP 4.5 Review Process for "the list enclosed, the remaining ER sites, and the Operational sites." Our agreement with NMED was to use an initial screening process in order to eliminate the need to complete the AP 4.5 Review Process for sites which had low potential for impacting a watercourse either by their physical location or by their lack of constituents. The FPLs were to provide the initial screening of PRSs located at or near watercourses, or which were subject to erosion. NMED was to provide a list of PRSs that they believed could have potential impacts on watercourses. This approach for the AP 4.5 Review Process is going forward at this time.

Completion of the AP 4.5 Review Process for all sites without some degree of prescreening is not an effective method of determining impacts on watercourses, since many of the remaining sites are located within buildings or at other locations which prevent contaminant movement. We recommend that the remaining "ER sites and Operation sites" be prescreened using criteria developed in coordination with the NMED SWQB in order to avoid unnecessary preparation of AP 4.5 forms for these sites. Once this prescreening is completed and we know how many remaining sites will require field surveys and constituent assessment, we will be able to prepare a schedule for completion of the AP 4.5 Review Process.

It is my understanding that throughout NMED/LANL discussions on the AP 4.5 Review Process, LANL has emphasized that the process is to serve only as a tool to identify sites where erosion controls should be installed prior to cleanup, and to identify sites where cleanups should be reprioritized. A technical and regulatory review is still needed in order to make an informed judgement on priority as opposed to relying solely on a numerical ranking. Results of the AP 4.5 Review Process should not be used exclusively to determine the need for erosion controls or accelerated cleanups, and NMED may request variations from current erosion control and cleanup plans outside the AP 4.5 Review Process at any time. LANL continues to address all cleanup issues through the ER Project Corrective Action Process in coordination with all appropriate Bureaus in NMED.

If further information would be helpful, please call me at (505) 665-5042, or Steven Rae of the LANL Water Quality and Hydrology Group at (505) 665-1859.

Sincerely,



M. L. Jody Plum
Office of Environment

LAAMEP:3JP-062

cc:

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cc:

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