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25 June 1996

Mr. Mat Johansen, LAAO AIP
Point of Contact
Department of Energy
Los Alamos Area Office
MS A316
Los Alamos, NM 87544

SUBJECT: Review comments concerning Los Alamos National Laboratory's (LANL) Draft Environmental Impact Statement (EIS) for the Medical Isotope Production Project: Molybdenum-99 and Related Isotopes

Dear Mr. Johansen:

The following DOE OB review comments were initially submitted to the DOE NEPA Section via NMED letter correspondence dated February 15, 1995. It should be noted that due to the short turn-around time required for review submittal and because the DOE OB responded during a public comment period, the referenced comments were never officially provided to the DOE LAAO POC. In order to keep all DOE OB correspondence consistent with the Site Specific Protocol currently being negotiated, these comments are now being provided to you for completeness of interagency record keeping. The following comments convey the New Mexico Environment Department (NMED), Department of Energy Oversight Bureau's (DOE OB) review of the referenced EIS. The following comments are provided for the purpose of communicating the results of the DOE OB review. These comments are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department.

GROUND WATER AND SURFACE WATER, LANL

1. Page 3.38, Section 3.3.2.9 Required Modifications

General Statement: While it is true that the cooling-water leak at the Omega West Reactor (OWR) reactor has been stopped, it is unclear what remediation activities have taken place since the leak was discovered. A comprehensive report of the extent of surface and subsurface contamination and the remediation activities completed to date should be included in the Draft EIS in order to make a reasonable determination as to whether the reactor should be re-started. Additionally, for the Omega West Reactor/Chemistry and Metallurgy Research Facility Alternative the NMED DOE OB staff recommends that OWR safeguards be installed to prevent future releases from underground piping, such as water-flow rate instrumentation with alarms that would detect water loss and notify process control technicians. Other reactor-hardware upgrades described in the Draft EIS need to be clarified for further review.

2. Page 4.29, Section 4.2.6.3 Site Stability

Comment: The text mentions that the Pajarito Plateau is dominated by three prominent fault zones, but fails to acknowledge that the trace of the Guaje Mountain Fault passes near the cooling towers of the OWR at TA-2. In the event OWR is re-started, has the Guaje Mountain Fault been



Los Alamos Canyon be funded and implemented if the DOE is seriously considering the Omega West Reactor/Chemistry and Metallurgy Research Facility Alternative. The recommended ground-water monitoring system could be addressed in a timely manner by implementing the LANL Ground Water Protection Management Program Plan (GWPMPP).

5. Page 4.46, Section 4.2.14.2 Low-Level Wastes

General Statement: Has there been a performance assessment of TA-50's current and future low-level radionuclide waste-treatment capabilities (with all proposed up-grades) to address the Omega West Reactor/Chemistry and Metallurgy Research Facility Alternative? TA-50 is currently experiencing problems with the present site-wide radionuclide waste stream it processes. Will TA-50, a facility that still utilizes "sixties technology" be able to adequately address the increased waste stream from Moly-99 target preparation and target dissolution?

If there are any questions concerning this matter please contact me at 672-0448.

Sincerely,



Steve Yanicak, NMED, DOE OB, LANL POC
New Mexico Environment Department

SY:mrdr

cc: Neil Weber, NMED, Chief, DOE Oversight Bureau
Elizabeth Withers, DOE LAAO, MS A316
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