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G/M/8/99

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

November 30, 1999

John C. Browne, Director  
Los Alamos National Laboratory  
P.O. Box 1663, MS-A100  
Los Alamos, New Mexico 87545

Theodore Taylor, Project Manager  
Los Alamos Area Office-Department of Energy  
528 35<sup>th</sup> Street, MS-A316  
Los Alamos, New Mexico 87544

**RE: Response to Hazardous and Radioactive Materials Bureau August 20, 1999 Letters on Regional Characterization Wells Under the Hydrogeologic Workplan  
Los Alamos National Laboratory  
NM0890010515**

Dear Dr. Browne and Mr. Taylor:

This letter is in response to the September 10, 1999, Los Alamos National Laboratory (LANL) letter entitled *Response to Hazardous and Radioactive Materials Bureau August 20, 1999 Letters on Regional Characterization Wells Under the Hydrogeologic Workplan* (reference EM/ER:99-260). The response from LANL concerns two August 20, 1999, letters from the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department. One letter concerned the completion of regional aquifer wells R-9 and R-12, while the other letter responded to the information that we requested regarding R-25, and included comments regarding the June 23, 1999 Hydrogeologic Workplan Meeting Notes. I will address first LANL's response to my letter entitled *Completion of R-9 and R-15 Regional Characterization Wells at LANL* dated August 20, 1999.



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The requirement that LANL submit a compliance schedule refers *only* to those regional characterization wells that at the time were partially complete (i.e., R-9, R-12, R-25 and R-15). At the time the letter was written, LANL had *not* completed a regional aquifer characterization well. The schedule as outlined in the HWP indicates that six to seven wells (R-9, R-12, R-25, R-7, R-22, R-18 and R-3) should have been completed (i.e., *casing installed and the well developed according to RCRA guidance*) by the end of Fiscal Year (FY) 1999. I therefore concluded that LANL was out of compliance with the approved HWP schedule.

We agree that well selection as part of the HWP should be iterative. Our support for this iterative process is underscored by our intent to introduce flexibility to the order of individual wells scheduled for completion in the HWP. However, the HWP has committed LANL to completing a certain **number** of regional characterization wells each year: **five** wells for FY98, **two** wells for FY99, **six** wells for FY00, etc. A drilling schedule for FY00 was recently presented at the Hydrogeologic Characterization Program Quarterly Meeting held October 13-15, 1999. The schedule listed nine wells that will be drilled and/or completed during FY00. Only seven of the wells, however, are part of the HWP drilling. We consider the **number** of regional characterization wells scheduled as the **compliance schedule**, not the specific wells or the order of drilling for this FY00. The schedule does **not** include R-25 and R-9 because these wells are to be completed by the end of **this** calendar year (1999).

The notification letter (dated August 11, 1999 and referenced by EM/ER:99-210) regarding the completion of regional aquifer well R-9 did *not* indicate that R-15 would be completed prior to demobilization to R-9. Furthermore, based on the schedule provided to HRMB in the aforementioned notification letter, we concluded that demobilization would occur prior to the completion of R-15 because at the time, drilling activities at R-15 were ongoing.

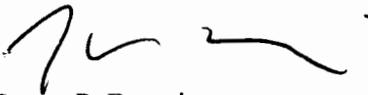
In reply to the LANL response to the letter regarding *Information Regarding R-25 well and Comments Regarding the June 23, 1999 Quarterly Groundwater Protection Program Meeting Notes, LANL (NM0890010515)*, we have the following comments.

We disagree with LANL's assertion that the contractors and subcontractors are **not** "apparently inexperienced." As LANL's own response to *Information Regarding R-25 Well* points out, the Barber rig is "relatively new" and the drilling contractor ". . . did not have experience with this technique." We recommend that the new drilling contract require that the drilling contractor be experienced in a variety of drilling techniques (including but not limited to, the Barber rig) in wide-ranging subsurface conditions.

We agree that ". . . well completion activities are more appropriately driven by regulatory requirements and that cost should not be the sole basis for drilling and well completion decisions." However, each time LANL exceeds a budget, other Environmental Restoration activities (e.g., interim measures, voluntary corrective actions) are affected. Although we are primarily concerned with the efficiency and timeliness of the drilling, cost becomes the concern of this agency under these circumstances.

LANL is urged to strongly consider our recommendations and concerns regarding the schedule and implementation of the Hydrogeologic Workplan. We are committed to working with LANL/DOE in order to more efficiently accomplish the goals of the HWP. Should you have any questions or comments regarding the clarifications discussed in this letter, please do not hesitate to call John Kieling of my staff at (505) 827-1558, extension 1012 or me at (505) 827-1567. A formal response is not required.

Sincerely,



James P. Bearzi  
Chief  
Hazardous and Radioactive Materials Bureau

JPB:jry

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