General

Los Alamos Study Group

November 14, 2000

Mr. Bruce Stedman, Monitoring and Technical Assessment Fund Manager
RESOLVE
1255 23rd Street NW, Suite 275
Washington, DC 20037

Re: **Letter of Intent, "Round Two" Request for Proposals**

Dear Bruce–

We are pleased to submit this letter of intent for your fall 2000 grant cycle.

Statement of Intent

The Los Alamos Study Group intends to submit a proposal to the Citizens' Monitoring and Technical Assessment (MTA) Fund for Round Two (Fall 2000). The Study Group is a non-profit 501(c)(3) non-governmental organization. In the words of your guidelines, we are not operating, and were not formed, for the purpose of acting as an agent, agency or advocate for any local (including city or county), state government or the federal government. We have never received governmental funds except as settlement payments and court-awarded attorneys' fees in litigation.

The Study Group drafted the "intent to sue" letter to Department of Energy (DOE) Secretary O'Leary and was instrumental in recruiting the other plaintiffs in the case that created the MTA Fund. We were among the small number of core organizations that conducted extensive research, provided key testimony, and helped determine strategy in that case.

While we have considerable environmental expertise of our own, we cannot most effectively apply that expertise, in the case of the cleanup at Los Alamos, without skilled and authoritative outside help. If this proposal were funded, we could leverage that combined experience and expertise for the benefit of many organizations and their constituencies while at the same time building institutional strength for future efforts.

Nature of Proposal

Los Alamos National Laboratory (LANL) is the largest active site in the nuclear weapons complex of the United States, with over $1 billion in weapons spending appropriated for the current fiscal year and over $5 billion in new nuclear infrastructure planned. There are 24 nuclear and hazardous waste dump sites at the facility, one of which is still open, where over 40,000 drums' worth of nuclear waste is disposed each year. There are also more than one thousand contaminated sites and locations at the site. Ground water is contaminated at all levels to varying degrees at many locations.

There is very little cleanup or permanent stabilization going on and little is planned at this site, despite the roughly $500 million spent so far in the environmental remediation (ER) program. The institutional barriers to cleanup remain strong.

HSWA LANL G/M

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First, we propose to create a manager- and public-friendly triaged, sortable database, with expert objective or subjective ratings of each contaminated location by nature and magnitude of source term, longevity of source term, migration potential for both sediment and water contamination, potential for off-site migration, and other attributes as determined by our contractor and ourselves, to accompany the maps of specific contaminated sites we have recently obtained and the larger volume of studies available from us and elsewhere.

We will place this user-friendly database on our web site, to accompany the maps and more detailed reports already extant we anticipate placing there with other funding. We will work closely with other local organizations to educate the general public using these and other tools.

The high-priority sites could be hyperlinked to the database from the map, but this work would be subsequent to this proposed work.

Not all of the relevant information exists, but the great bulk of it does exist to an adequate degree of precision, and the data gaps can be indicated. There is also a considerable body of knowledge residing in the regulatory community which no one has written down, and which could be accessed through structured interviews. Data gaps can be characterized by type and severity and noted.

This database, data gaps included, would be extremely useful to regulators, citizens, pueblos, LANL, and the DOE, and could help break the paralysis that now grips the site, leading to more effective enforcement, citizen participation, and budgeting. At the present time, no such integrative document exists that any manager can use, and all parties are bogged down in endless details that are impenetrable to nearly everyone.

Second, we propose to create a educative taxonomy of appropriate cleanup/stabilization actions for characteristic LANL situations--a sort of basis set--with technical references, so that the uniqueness of each site need not serve as a blanket excuse for further inaction. It is characteristic of LANL to reinvent each action *de novo*, but there is little need to do this.

Third, this basis set will contain a range of unit cost estimates for each approach.

Fourth, for the 24 material disposal areas (MDAs), representative cover designs for capping these areas with unit costs will be presented.

All these products will lay the groundwork to direct LANL cleanup expenditures in more fruitful directions, while facilitating public participation of every type. Without this work, there is not even a common language to talk about the site.

This project will be further refined in scope and direction through discussions with the state (both the environment department and the attorney general's office), pueblo organizations, local governmental organizations, potential contractors, and the DOE prior to final submittal.

Proposal Execution

We anticipate hiring one of the region's hydrogeological consulting firms to do this work under our overall general direction, negotiating a nonprofit rate from them. Two such eligible firms would be Daniel B. Stevens and Associates in Albuquerque and Souder-Miller Associates in Santa Fe, and there are several others as well, each with their pluses and minuses. It would be desirable to have both hydrology and civil engineering expertise in-house. It is very important that the individuals involved in oversight of the project have at least a decade of experience in site remediation, as the project relies on technical judgement both in the details of its design and

in its execution. Most of the work could, however, be done by more junior staff if competent supervision was provided.

My own background will be helpful, stale as it may be. I have conducted, participated in, reviewed, or supervised many small industrial site investigations and remediation programs, for both groundwater and soils, from gas stations to a uranium mill tailings site to Lawrence Livermore National Laboratory. I initiated and directed the first regulatory enforcement actions at LANL and was centrally involved in designing the original ground-water and vadose zone monitoring systems at the site in 1984 and 1985, and received in-service training by the state to review closure plans at LANL--plans that remain, to this day, in limbo. More recently, our organization organized and led a successful multi-cultural coalition that forestalled expansion of "Area G," LANL's nuclear waste dump, among other successes.

We are requesting $50,000 in funding for this large project, which we will be in effect matching to a considerable degree by work conducted with other funding.

Proposal Evaluation Criteria

We have reviewed the Proposal Evaluation Criteria and believe that our organization, project and experts will easily meet all of the eligibility requirements.

Certifications

We have reviewed the certifications document and believe that our organization, project and expert(s) will meet all of the required certifications.

Thank you for your consideration. Please call if you have any questions.

Sincerely,

Gregory Mello

Greg Mello,
Executive Director