



Los Alamos National Laboratory
 Environmental Programs
 LANL Water Stewardship, MS M992
 Los Alamos, New Mexico 87545
 (505) 665-0239/FAX (505) 665-4747

General



National Nuclear Security Administration
 Los Alamos Site Office, MS A316
 Environmental Restoration Program
 Los Alamos, New Mexico 87544
 (505) 667-7203/FAX (505) 665-4504

Date: August 7, 2006
 Refer to: EP2006-0735

Mr. James Bearzi
 NMED-Hazardous Waste Bureau
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303

SUBJECT: REQUEST FOR EXTENSION OF DELIVERABLE DUE DATE FOR THE REVISED GROUNDWATER BACKGROUND INVESTIGATION REPORT

Reference: Letter, Bearzi to Johansen and McInroy, dated July 3, 2006

Dear Mr. Bearzi:

The U. S. Department of Energy (DOE) and Los Alamos National Laboratory are in receipt of the New Mexico Environment Department's (NMED's) notice of disapproval (NOD) for the *Groundwater Background Investigation Report* (LA-UR-05-2995/ER2006-0516). We are in general agreement with your 22 comments and have discussed them with your staff.

By this letter we are requesting an extension beyond the 60-day response of August 31, 2006, to December 15, 2006, to revise the report. The primary reason for this request is not because additional time is required to address NMED's comments, but rather because the limitations of the report, acknowledged by NMED, the U.S. Environmental Protection Agency, ourselves, and other parties restrict our ability to use background for numerous specific applications. These applications (e.g., well screen analysis, periodic monitoring reports) have pointed out the limitations in the current background data set, the need for a more robust set of statistical measures so that background information can be used in a more defensible manner, and the need for a wider distribution of background locations along flowpaths. In fact, an improved background data set is needed irrespective of applications and their timing relative to the original report, in which we state that revisions should be expected based on new applicable information.

For the above technical reasons, we will be making necessary revisions to the report that cannot be completed by August 31. The revisions do not involve collecting additional data. We request an extension to December 15, 2006, to complete these revisions. We acknowledge that a delay of 3.5 months may have an effect on NMED's corrective action decisions. The alternative, however, is our supplying NMED with responses to comments



in a revision 1 of the report by August 31, followed by a revision at our initiative that corrects deficiencies in the report that are not captured by NMED's comments in the NOD.

If you have any questions, please contact Ardyth Simmons at 665-3935 (asimmmons@lanl.gov) or Mat Johansen at 665-5046 (mjohansen@doeal.gov).

Sincerely,



Andrew Phelps
Associate Director,
Environmental Programs
Los Alamos National Laboratory

Sincerely,



David Gregory,
Federal Project Director
Department of Energy
Los Alamos Site Office

AP/DG/AS/ew

Cy:

T. Behr-Andres, EP-WSP, MS M992
J. Dewart, EP-WSP, MS M992
A. Dorries, ERSS, MS M992
D. Gregory, DOE-LASO, MS A316
A. Groffman, EP-WSP, MS M992
M. Johansen, DOE-LASO, MS A316
D. Katzman, EP-WSP, MS M992
L. King, EPA Region 6
P. Longmire, EES-6, MS D469
E. Louderbough, LC-ESH, MS A187
C. Mangeng, ADEP, MS J591
A. Phelps, ADEP, MS J591
P. Reneau, EP-RCRA, MS M992
M. Riggs, EP-ESP, MS M992
D. Rogers, EP-WSP, MS M992
A. Simmons, EP-WSP, MS M992
T. Skibitski, DOE-OB
S. Yanicak, DOE-OB, MS J993
EP-WSP File, MS M992
IRM-RMMSO, MS A150
RPF, MS M707