



**Department of Energy**  
Field Office, Albuquerque  
Los Alamos Area Office  
Los Alamos, New Mexico 87544  
**FEB 8 1994**



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Chief  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
1190 St. Francis Drive  
P. O. Box 26110  
Santa Fe, NM 87502

Dear Mr. Garcia:

Enclosed for your review is the first quarterly progress report on the transuranic waste storage pad remediation project at the Los Alamos National Laboratory. This report is required by Section IX.C of the December 10, 1993 three-party Consent Agreement pursuant to compliance orders 93-01, 93-02, 93-03 and 93-04, and is being submitted by the Department of Energy (DOE) and the University of California. A preliminary report is due within 60 days of the effective date of the Consent Agreement, or February 8, 1994. In addition, the first quarterly report is due by February 15, 1994. Because the information required is identical, the enclosed contains information required for both reports. The following elements, as required by the Consent Agreement, are addressed in the enclosed report:

1. A brief description of activities completed during the reporting period to implement the requirements of this Consent Agreement.
2. A brief description of activities scheduled for the following reporting period.
3. A description of any change in key project personnel which occurred during the reporting period.
4. A description of problems encountered during the reporting period and mechanisms used or proposed for resolving the problems.
5. Tables and figures summarizing all data, sampling and test results for the period.



Benito Garcia

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FEB 8 1994

Supporting documentation will be retained at DOE and will be made available to your staff upon request. If you have any questions regarding this matter, please call Jon Mack of my staff at 665-5026.

Sincerely,



Joseph C. Vozella, Chief  
Environment, Safety, and Health  
Branch

LESH:7JM-119

Enclosure

cc w/enclosure:

R. Nevarez, WMD, AL

cc w/o enclosure:

J. Laeser, Counsel, LAAO

D. Erickson, ESH-DO, LANL,  
MS-K491

A. Gancarz, CST-DO, LANL,  
MS-J515

A. Drypolcher, CST-7, LANL,  
MS-E517

K. Hargis, ESH-8, LANL,  
MS-K490

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MS-K498

P. Schumann, CST-7, LANL,  
MS-E539

**TRANSURANIC WASTE STORAGE RECONFIGURATION PROJECT  
PRELIMINARY/QUARTERLY REPORT  
REPORTING PERIOD: DEC. 10, 1993 - FEB. 15, 1994**

The Transuranic Waste Storage Reconfiguration Project (TWSRP) has been initiated at Technical Area (TA) 54, Area G, to ensure compliance with all applicable regulations and requirements concerning the storage of legacy transuranic (TRU) waste. The TWSRP involves removing TRU and TRU mixed waste from dense pack arrays under soil cover to a more inspectable configuration within storage facilities. The TWSRP will ensure all waste is moved into inspectable storage arrays by September 30, 2003. The TWSRP's mission is to ensure that compliance is met while the safety of workers, the public and the environment is protected during all phases of the retrieval and storage of the TRU waste.

**I. Activities completed during the reporting period of December 10, 1993 to February 1, 1994.**

**1. Response to Notice of Deficiency**

On December 17, the Los Alamos National Laboratory (LANL) received a Notice of Deficiency (NOD) from the New Mexico Environmental Department (NMED). The NOD requested additional information regarding the waste analysis plan, the spill control plan, and the closure plan contained in the RCRA Part B Permit Application for the project. The information was requested to address findings resulting from the NMED's review of the application. A formal response to the NOD was submitted to NMED on January 28, 1994.

**2. Permit modification public meetings**

On December 13, 1993, LANL held two public meetings to provide information regarding the permit modifications to the Laboratory's Hazardous Waste Permit necessary for the TWSRP. The meetings were held pursuant to the requirements of the New Mexico Hazardous Waste Management Regulations, 40 CFR §270.42. One month before the meetings were held, appropriate meeting notifications appeared in five area newspapers, and a mailing was sent to approximately 1600 people or organizations contained in the Laboratory's public participation mailing list.

The project history and technical reasons for the permit modification were presented at the meetings. Exhibit boards, a project fact sheet, copies of the view graphs were used during the presentation, and an evaluation card to seek the participants' input were distributed to aid the public's understanding of the issues. LANL staff were also present to answer additional questions.

**3. Radionuclide emissions preconstruction approval request**

On January 14, 1994, LANL submitted an application for preconstruction approval to the Environmental Protection Agency (EPA) pursuant to the National Emission Standards for Hazardous Air Pollutants Regulations, 40 CFR 61 Subpart H, Radionuclides. This application for preconstruction approval outlines the process and resulting off site dose consequences from the proposed TWSRP. A response from the EPA on this request is expected by March 15, 1994.

**4. Preparation of Preliminary Safety Analysis Report**

A Preliminary Safety Analysis Report (PSAR) has been prepared and is under review. This review is expected to be completed by May, 1994.

**5. Project final design progress**

The project final design is under review. Facility comments have been received and the expected completion date is dependent upon the approval of the PSAR.

**6. Sampling of TRU Pad areas**

An enhanced surveillance and sampling program around the TRU Pads has been ongoing since June 1993. Initial samples have been gathered. Because of limited analytical capacity at the Laboratory, additional analytical laboratories have been contracted to ensure that samples related to the project will be analyzed quickly. Sample data and related analysis will be included in subsequent quarterly reports as they become available.

**7. Draft completion of the Project Management Plan and two Standard Operating Procedures**

The Project Management Plan (PMP) is a working document the project manager and the project management team will use during each phase of the project to ensure compliance with appropriate regulations and procedures. This document is in draft form and is going through internal review. It is expected that this document will be reviewed and implemented by May, 1994.

The drum retrieval and crate retrieval standard operating procedures (SOPs) are now in draft form. These SOPs describe the manner in which containers will be retrieved from their current dense pack array. These documents are expected to be approved by May 1994.

**8. Equipment purchases**

LANL is purchasing equipment necessary for the safe retrieval and storage project. Two forklifts and a vacuum truck are presently being obtained. The Laboratory expects to have this equipment on site by September, 1994.

LANL has also obtained site support trailers, in December, 1993, which are necessary for the waste retrieval effort. These trailers are now on site at TA-54, Area G.

**9. Revised project cost estimate for ten year retrieval and storage effort**

Because retrieval and storage facilities have become more complex than originally planned and the retrieval schedule calls for all waste to be placed in safe and inspectable storage by September 30, 2003, a new project cost estimate was needed for long term budget planning. This was completed in December, 1993. The revised estimate for total project costs is approximately \$43,000,000.

**10. Drum vent system design criteria**

The design criteria for the drum vent system (DVS) is now in final review. The DVS final design is expected to be complete by April, 1994 with the DVS operational by February, 1995.

### **11. Drum Prep Facility upgrade**

The final design for the Drum Prep Facility is complete. The construction necessary for the upgrade is planned to begin April, 1994 and will take approximately 10 weeks to complete.

### **II. Activities Planned for the Reporting Period of February 16, 1994 to May 15, 1994**

1. The Laboratory will continue to respond to retrieval and storage facility design comments from NMED. Final design of the retrieval and storage facilities is expected by March 15, 1994.
2. The Laboratory will continue to respond and resolve review comments of the PSAR. DOE approval of the PSAR is expected by April, 1994.
3. Enhanced environmental surveillance of the TRU Pad area with TA-54 Area G will continue. Sample data will be made available for NMED's review as it is developed.
4. Draft operations documentation including the PMP, and the drum and crate removal SOPs will continue to be reviewed. Other required SOPs will be developed as necessary.
5. Required training for all contractor construction and retrieval personnel will be finalized.
6. Equipment necessary to this phase of the project will be procured.
7. The upgrade of the Drum Prep Facility will be completed.

### **III. Changes in key project personnel during the reporting period of December 10, 1993, to February 1, 1994.**

No changes in key personnel have taken place.

### **IV. Problems encountered during the reporting period of December 10, 1993 to February 1, 1994.**

No operational or project management related problems have occurred in this reporting period.

### **V. Data, sampling, and test results for the reporting period of December 10, 1993, to February 1, 1994.**

As discussed in Item 6 of the completed activities for this reporting period, an enhanced surveillance and sampling program has been initiated around the TRU Pads. Increased analytical capacity has been contracted for and sample data will be included in subsequent quarterly reports as they become available.