

To: geri@lanl.gov  
From: ryder@lanl.gov (Rich Ryder)  
Subject: RCRA Interim Status Inspection Plan for Mixed Waste Units  
Cc: grieggst@lanl.gov, jwhitel@lanl.gov  
Bcc: pesenti@lanl.gov  
X-Attachments:

Thank you for sending me the copy of the subject document. I'm assuming that this is the official Laboratory plan that has been agreed to by the Laboratory and the regulating authority (even though there are no signatures to indicate that) and that the Laboratory is obligated to follow it even if it is more restrictive than the applicable sections of the CFR. Is that right?

What can be done to modify the plan so that the Laboratory has only to meet requirements, not exceed them? For example, I note that in the case of surface impoundments the need for daily inspection is based on assuring that a minimum of 2 feet of freeboard is maintained. At TA-53, the NE and NW impoundments are essentially dry, and the S impoundment has at least 6 ft of freeboard. RLW is transferred to the impoundment at a rate of approximately 1000 gallons/day -- not even enough to keep up with evaporation! Even if all of the radioactive water systems were to be dumped at once during a hundred-year rain there's no chance of overflowing the containment.

I'm looking for some relief from the need to do daily inspections and would appreciate any help that ESH-19 can give me.



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