

February 5, 1987

Mr. Carlos Castillo
USEPA (6H-HS)
1201 Elm Street
Dallas, Texas 75270

RE: Jacobs Engineering Group Closure Plan Review

Dear Mr. Castillo:

We have read the Jacobs' December 23, 1986, review of the Los Alamos National Laboratory closure plans and find the report disappointing. It appears that Jacobs did little more than confirm the presence or absence of information required by regulation, a simple clerical function. We had expected a detailed technical review of the adequacy of LANL's proposed actions, especially the cap to be constructed over the Area P landfill and the concrete plugs in the disposal shafts at Area L.

We believe that the submittal may serve a purpose as a condensation of the plans and a summary of the proposed actions but they are entirely inadequate, without specific references to the regulations, for citing violations. Since we have no requirement for this condensation, we do not believe they have provided a useful product.

If this submittal is indicative of the results we can expect for other closure plan reviews, we strongly recommend that EPA reconsider the benefits of contractor review. We would prefer to perform our own evaluation if we had adequate staff to accomplish this in a timely manner.

Thank you for the opportunity to participate in your contract QA review process. We trust the above observations will be helpful.

Sincerely,

C. Kelley Crossman,
Environmental Scientist

cc: Mark Sides, EPA (6H-CP)
Jack Ellvinger, EID (GW/HWB)

*The review of the
closure plan submitted
will require a number of
days to complete. In many
cases, the review will
probably delay the final
approval of the closure plans.*



14908

Permit

TK