

Permit

John R
John V
October 7, 1998
File

To : CAB

From: Environmental Restoration Committee

Subject: Recommended request to David Gurule (DOE) concerning future No Further Action (NFA) permit modifications.

Mr. David Gurule
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

Dear Mr. Gurule:

Of the total 2124 Potential Release Sites (PRS) at Los Alamos National Laboratory the Environmental Restoration (ER) Project has proposed 1,404 No Further Action (NFA) permit modification requests (through January 14, 1998). The Department of Energy reviews the NFA requests before submitting them to the Environmental Protection Agency (EPA) or the New Mexico Environment Department (NMED).

It is the understanding of the Northern New Mexico Citizens' Advisory Board that the government agencies, especially NMED, do not have the financial resources nor the staff to process the requests in a timely manner. Delays in the process may result in two problems:

1. The ER Project is forced to carry the subject PRS's on it's books, thus incurring additional costs.
2. It is expected that the agencies will deny some of the permit request based on any of several grounds, most notably that the site has not been restored to acceptable standards.

To help expedite the process the Northern New Mexico Citizens' Advisory Board requests that the ER Project formally notify the Board concurrent with DOE notification of future NFA permit requests. Such notification should include a brief description of the site, contaminant(s) and levels, type and level of risk assessment and NFA category. The Board will review the requests and make appropriate recommendations to the DOE, LANL, EPA and NMED. Inclusion and review by the Board should help expedite the restoration efforts at LANL.

Please advise when we can expect a response. Thank you.

Sincerely,

George C. Chandler
Chairman, NNM CAB



Cc: Julie Canepa, LANL, EM-ER, MS M992
Tom Baca, LANL, EM-DO, MS J591
M.J. Bryne, DOE-LA-AO, MS A316
Ted Taylor, DOE-LA-AO, MS A316
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October 1, 1998

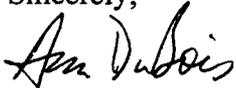
Dear Board Members,

Enclosed are some additional papers you will need for our October 7 meeting. The ER Committee drafted two recommendations that need your approval.

Catherine Rivera-Lyons corrected the Work Plan for the Waste Management Committee. I made minor editorial changes to the rest of the document to smooth the language. However, I made no substantive changes in case you reviewed the previous document. Thanks.

I look forward to seeing you soon.

Sincerely,



Ann DuBois
Public Participation Specialist

October 7, 1998

To : CAB

From: Environmental Restoration Committee

Subject: Recommended request for information to David Gurule concerning the US DOE Office of Inspector General "Audit of Environmental Restoration at the Los Alamos National Laboratory" IG-0410

Mr. David Gurule
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

Dear Mr. Gurule:

The Environmental Restoration Subcommittee of the Northern New Mexico Citizens' Advisory Board has reviewed the US DOE Office of Inspector General "Audit of Environmental Restoration at the Los Alamos National Laboratory" IG-0410". The audit recommended several actions targeted to improve the Environmental Restoration Program (ER) at Los Alamos National Laboratory (LANL). The DOE concurred with these recommendations. In particular the CAB is interested about the progress made by the Los Alamos Area Office and the LANL ER program towards satisfying these recommendations. The audit also raised several issues that the CAB would like to be informed about. Thus we request that the DOE, in concurrence with LANL, provide the following information :

1. Please describe the changes DOE made to the ER Program.
2. Does ER cost data exist for similar ER programs at other DOE facilities? If so, please provide comparable data.
3. Has DOE concluded anything from it's data validation studies?

The CAB recognizes that some of the deficiencies found by the Inspector General may have been due to changing, and conflicting, DOE, LANL or State of New Mexico requirements, definitions and accounting procedures. If this is the case then please describe the conflicts and efforts to eliminate these.

Please advise when we can expect a response. Thank you.

Sincerely,

George C. Chandler
Chairman, NNM CAB

Cc: Julie Canepa, LANL, EM-ER, MS M992
Tom Baca, LANL, EM-DO, MS J591
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**Work Plan for
Northern New Mexico Citizens' Advisory Board
on Environmental Management
FY99**

Environmental Restoration Committee

- Review LANL's No Further Action Sites
- Hold 4 Work Sessions on Risk-Based Analysis, Potential Release Sites, Canyons, Material Disposal Areas
- Travel to other Boards and Sites, e.g., Rocky Flats and Richland
- Review technical materials (e.g., text books, data from other facilities)
- Review and evaluate standards/criteria on 500 "No Further Action (NFA)" sites
- Review and evaluate remaining 600 sites
- Review and evaluate "Top 13" NMED sites
- Identify roadblocks to task completion
- How do NMED standards compare with DOE standards and EPA standards?
- How does DOE determine radionuclide standards?
- Identify communication standards. How can we facilitate an information exchange?
How can we improve cooperation and coordination on work activities?
- LANL should send the Board the list of 2000+ "No Further Action" sites that they recommend for removal from the NFA list when they send this list to DOE in the December time frame. ER Committee will review LANL's recommendations and forward comments to DOE, NMED, the Secretary of Energy and the Governor of New Mexico urging expedited processing. CAB will publicize its comments and work to increase public pressure on state (NMED) to expedite the approval process.

Evaluation Criteria

6 Months - February 1999

- (1) The Committee has reviewed NFA standards and issued press release on findings.
- (2) The Committee has developed recommendation(s) re: NFA standards, prioritization of sites, and level of cleanup.
- (3) The Committee has reviewed and prioritized "Top 13" NMED sites.

1 Year - September 1999

- (1) The Committee has reviewed the criteria and standards on remaining 1,600 sites.
- (2) The Committee has worked with DOE and LANL on development of brochures, exhibits and reports addressing the evaluation of standards and prioritization of sites.

Monitoring/Surveillance Committee

- Hold Workshop/Seminars on Air, Water, Soil
- Identify and Analyze LANL's Documents and Data regarding Monitoring and

Surveillance

- Consult with Independent Consultants (EPA, NMED, Tribal, nongovernmental organizations like CCNS).
- Compare Sampling and Analysis Techniques with LANL, EPA, NMED, Tribal etc.
- Consult with Rocky Flats, Sandia, Hanford, Savannah River and other SSABs.
- Communicate with other Boards

Community Outreach

- Publicize the Work Plan
- Provide General Publicity for Meetings, Recommendations and Special Events
- Review Current Publicity Outlets and Develop New Strategy for Outreach to include: Pueblo newsletters, Eight Northern and Southern Tribal publications, Public Service Announcements, Newspapers, Environmental Papers, Television Shows and Radio Interviews, Spanish Language Announcements, Service Club Meetings, High School Students Special Projects
- Create Web site for Board and establish Links with Other Web Sites
- Present Certificates of Appreciation to Current and Former Board members
- Find more Office Space for Staff and Files
- Place more materials in LANL's Reading Rooms around the state
- Develop Recommendation regarding Co-location and Evening Hours in Schedule of CAB, WIPP, and LANL Reading Rooms
- Network with Community Groups
- Attend Community Meetings to hear Community Concerns and present Board's Work
- Place Articles in NMED Newsletter
- Provide 800 phone number (recording outreach information for meeting dates, times, guest speakers, specially sponsored CAB events, tours, committee meetings)
- The Committee will develop a draft plan and bring it back to Board on October 7
- Jointly sponsor quarterly public meetings on Environmental Safety and Health related issues. Bob Prommel will follow up for CIO ESH
- The Committee will participate in public outreach training in Albuquerque on September 22, 1998
- The Environmental Restoration and Environmental Management Committee will coordinate and communicate "early and often" as they plan their meetings, workshops and field trips. Coordinate with Carmen Rodriguez in CIO
- Develop strategies to improve participation between Board members and the public
- Hot issues: Hold a public meeting in Pojoaque on possible well contamination, aquifer contamination, contaminated sediment at Cochiti Dam, has contamination migrated down to San Ildefonso, Nambe, San Juan, Española, or Santa Fe?
- Focus on one area of discussion for next meeting and include that in advertisements of meetings
- Create press releases one week before and within one week following each Board meeting.

- Include CAB members and local elected officials in tour going to WIPP

General Board Plans

- Invite Secretary Richardson to meet with Board as part of his next Northern New Mexico visit
- Send Representative to SSAB Chair Meeting in September
- Create a vision of future for LANL
- Advise DOE on resource use and generation
- Ask MJ Byrne to check with DOE Headquarters re: suggested changes in Board's Mission
- Add Environmental Stewardship discussion to each Board meeting. Prior to the discussion phase, CAB invites speakers to introduce and broaden our understanding of stewardship concepts

Budget for FY99

Phone	\$ 1,200
Postage	\$ 500
Publicity	\$ 2,500
Meeting Expenses	\$ 2,500
Retreat	\$ 6,000
Travel to Board and Committee meetings	\$ 6,000
Committee Expenses	
Environmental Restoration	
Work Sessions	\$ 4,000
Travel to Other Sites	\$ 7,000
Technical Materials	\$ 1,000
Waste Management	
Travel to Other Sites	\$ 10,000
Hold Work Sessions	\$ 5,000
Monitoring & Surveillance	
Hold Seminars	\$ 5,000
Independent Consultants	\$ 5,000
Community Outreach	
Publicity	\$ 5,000
Technical Materials	\$ 3,000
Salaries	\$130,000
Staff Travel	<u>\$ 1,000</u>
Total	\$194,700