

LANL PERMIT WORKING GROUP STATUS REPORT

A LANL Permit Working Group meeting was held on May 11, 2000, at an NMED HRMB conference room. In attendance were Michael Chacon (NMED/HRMB), John Stetson (DOE/LAAO), Jack Ellvinger (LANL/ESH-19), Gian Bacigalupa (LANL/ESH-19), and Peggy Reneau (IT Corporation). The following is a status report, based on issues discussed during the meeting:

- Closure Plans—IT will reconsolidate closure plans in TA-specific permit chapters to make them complete, stand-alone closure plans. In the General permit chapter, the closure plan will refer the reader to TA-specific closure plans. The level of detail in the TA-specific permit chapter closure plans will be written so they are not too prescriptive and allow some flexibility at closure.
- Closure Plans—For the TA-16 closure plans, IT will incorporate the approach for the TA-16-394 closure plan, as appropriate. Text will be added, indicating that information from the operating record may be used to determine focused sampling locations. For the TA-16 container storage area, an iterative sampling approach may be used. Cleanup levels may be determined with risk assessments for both the container storage area and the burn ground unit. Pre-closure activity screening measures for mixed waste units may mention radiological screening for health and safety concerns and as a tool to indicate the potential presence of hazardous constituents.
- Waste Analysis Plan—LANL will provide proposed language regarding acceptable knowledge/supplemental knowledge as a response to the General Part B RSI. Incorporating WIPP language verbatim may not be appropriate for the LANL WAP due to its larger scope. It may also require a major rewrite of the WAP by breaking up the waste media type sections (i.e., separate AK sections for hazardous vs. MTRU waste) rather than allowing a general incorporation of similar conditions as currently written.
- Public Notice—LANL will provide assistance regarding public notices. They may be structured similar to ER public notices or the DVRS public notice.
- HRMB reserves the right to resolve final issues through the permit approval process.
- Because LANL and the townsite of Los Alamos are closed as a result of the Cerro Grande fire, the schedule for the permit documents will be revised by IT upon reopening of LANL. HRMB will need to change the reservation dates for the LaFarge Library.
- A copy of other OB/OD permits may be found at <ftp://nmenv.state.nm.us>.
- Location Standards—There is a question regarding the status of existing vs. new units and the applicability of location standards. Upon reopening of LANL, Jack and Gian will inform UC Legal of the argument and citations presented for NMED's position.
- The next LANL Permit Working Group meeting will be scheduled at a later date.



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