



State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
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GARY E. JOHNSON
GOVERNOR
September 9, 1996

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Mat Johansen, DOE LAAO AIP POC
U.S. Department of Energy
P.O. Box 1663, MS A316
Los Alamos, NM 87545

RE: Review of Los Alamos National Laboratory's "Task/Site
Workplan for Operable Unit 1049" dated November 1995

Dear Mr. Johansen:

DOE Oversight Bureau (DOB) has reviewed the subject document. The following comments are provided for the purpose of communicating the results of the review. They are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department. This review is offered as a supplement to an earlier review transmitted in a letter to Court Fesmire dated May 6, 1996 which focused on Chapter 7 Sections 7.3 through 7.3.3.1.4. The comments included here are consistent with recent discussions between the DOE OB and LANL FU-4 staff.

General Comments:

1. DOE OB staff appreciate the effort that has gone into the preparation of this document. It describes investigations which appear to be appropriately designed to answer important questions regarding the characterization of sediment, surface water and ground water in Los Alamos and Pueblo Canyons.
2. We suggest that LANL take interim measures to stabilize any known areas of significant contamination in sediment units from further migration until appropriate final measures can be implemented.

Specific comment:

1. **§ 5.1.5, Impacts Through Contaminant Transport**

We suggest that LANL perform investigations to confirm the conceptual model related to the depth of sedimentary units and any buried sedimentary units that may have been affected by laboratory activities. Sampling at the bottom of the sedimentary units may be required to define the vertical extent of contamination.

LANL Env. Ref. - 1049

LANL
(Complete) TH-0
Los Alamos Canyon
LA/Pueblo workplan



2. § 7.2.2.1.2, Reach LA-2

It is unclear to us why the entire DP Canyon reach is not included in the investigation of reach LA-2. DOE OB's observations show that a large amount of storm water enters Los Alamos Canyon from DP Canyon, and LANL historical data and more recent DOE OB data show that contaminants are being transported in the dissolved and suspended-sediment fractions of storm water. We believe that a large portion of the contamination in reach LA-2 is a result of contaminant migration from DP Canyon; therefore, we suggest the inclusion of DP Canyon in the LA-2 investigation.

3. § 7.3.3.1.1, Page 7-39, Surface Water Sampling

"The number and location of surface water samples will be determined in the field based on the availability of water at the time of sample collection."

Surface-water samples should be collected in conjunction with runoff from precipitation and spring snow melt. Information is needed on the physical transport of contaminants in suspended and bed-load sediments and dissolved phase. This information should then be compared to Purtymun et al. 1990, 6992, and other applicable historical data.

If there are any questions, please contact me at 505-672-0448 or Chris Hanlon-Meyer of the DOE Oversight Bureau Technical Support staff at 505-827-1536.

Sincerely,



Steve Yanicak
NMED LANL POC

SY:CHM:chm

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