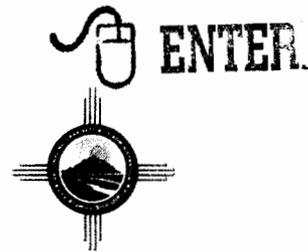




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 Los Alamos, New Mexico 87544
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Date: **SEPTEMBER 25, 2012**
 Refer To: EP2012-0200

John Kieling, Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303

Subject: Request for Extension to Install Sampling Systems at Wells R-5, R-7, R-8, and R-9i and to Submit the Letter Confirming Installation

Dear Mr. Kieling:

The U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) are in receipt of the New Mexico Environment Department's (NMED's) July 2, 2012, letter denying Los Alamos National Laboratory's (the Laboratory's) request for a 2-yr extension. This letter reiterates the request for an extension under Section III.J.2 of the March 2005 Compliance Order on Consent (Consent Order) from the October 11, 2012, date to convert the sampling systems at wells R-5, R-7, R-8, and R-9i to June 30, 2014, and a date of July 30, 2014, to submit the letter confirming the conversions.

Instead of converting these wells by the previously specified dates, DOE/ LANS proposes to divert the resources planned for converting wells R-5, R-7, R-8, and R-9i to complete Westbay conversions at wells CdV-R-15-3 and CdV-R-37-2 and to install the dedicated sampling system at CdV-16-4ip at Technical Area 16 (TA-16) in fiscal year (FY) 2013 to advance the TA-16 260 monitoring network and address explosive compounds detected in groundwater at TA-16. The Westbay sampling systems have already been removed from these wells as part of a study conducted in 2011 to evaluate performance of the systems. The wells are currently in a parked configuration with temporary packers in place. DOE/LANS believes conversion of the sampling systems in these wells is a higher priority for the protection of groundwater resources than wells R-5, R-7, R-8 and R-9i, which are currently in stable configurations.

DOE/LANS appreciate the importance of completing the Westbay conversions at wells R-5, R-7, R-8, and R-9i and plan to implement that work by the end of FY2014. DOE/LANS propose to complete the Westbay conversions at wells CdV-R-15-3 and CdV-R-37-2 by June 30, 2013. Per NMED's approval of the Laboratory's extension request, dated February 21, 2012, the current due date to install the dedicated sampling system in CdV-16-4ip is March 13, 2013. In accordance with the approach set forth above, installation of the dedicated sampling system in CdV-16-4ip will now be complete by June 30, 2013. Specific dates for completion of work at each of these three wells



will be provided in individual work plans already scheduled for submittal to NMED in mid-November and early December 2012.

DOE/LANS initially requested a 2 yr extension for the conversions on June 22, 2012, in order to focus resources on the shipment of aboveground transuranic (TRU) waste from Los Alamos National Laboratory's Technical Area 54, Area G, to the Waste Isolation Pilot Plant. In accordance with the Framework Agreement, DOE/LANS continue to prioritize groundwater protection and believe that extending the conversions of the Westbay sampling systems at wells R-5, R-7, R-8 and R-9i does not compromise groundwater protection in the monitoring network for TA-21. Rather, DOE/LANS believe that accelerating work at the above-referenced wells in Cañon de Valle is more protective of our groundwater resources and is consistent with Governor's goal of protecting groundwater and drinking water resources.

If you have any questions, please contact Dave McInroy at (505) 667-0819 (mcinroy@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@nnsa.doe.gov).

Sincerely,



Jeff Mousseau, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,



Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Site Office

MG/PM/TG/DM/SP:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Jim Davis, NMED-Resource Protection, Santa Fe, NM (date-stamped letter emailed)
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
Cheryl Rodriguez, DOE-LASO (date-stamped letter emailed)
Hai Shen, DOE-LASO (date-stamped letter emailed)
David Rhodes, DOE-LASO, MS A316 (date-stamped letter emailed)
Peter Maggiore, DOE-LASO (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
Steve Paris, EP-CAP (date-stamped letter emailed)
John McCann, EP-CAP (date-stamped letter emailed)
Dave McInroy, EP-CAP (date-stamped letter emailed)
Tori George, EP-REG (date-stamped letter emailed)
Bruce Schappell, ADEP (date-stamped letter emailed)
Dan Cox, ADEP (date-stamped letter emailed)
Jeff Mousseau, ADEP (date-stamped letter emailed)
William Alexander, EP-BPS (date-stamped letter emailed)
RPF (electronic copy)
Public Reading Room, MS M992 (hard copy)