

**Request for Supplemental Information
Voluntary Corrective Action (VCA) Plan for
PRSs 0-003, 0-012, and 0-030(i)**

Site Specific Comments

PRS 0-003

Section 4.2.1 PRS 0-003:

1. Page 23, the 3rd paragraph: The purpose of the VCA plan on Site 0-003 is to define the horizontal extent of lead and dibenzofuran. To achieve that purpose, LANL proposed one additional sampling location (downgradient of the elevated lead detection), and stated that additional locations will be sampled to further define the extent of lead, if necessary.

The proposed one-sample strategy is not sufficient. LANL is advised to take several samples, instead of one, at the downgradient area from that location to determine whether there is a release and to get the investigation done once and for all. The cost of sampling and analyzing is only a fraction of the total cost of each investigation, therefore, an increase in the number of samples is justifiable.

PRS 0-012

Section 2.2.3 Results of Previous Investigation:

2. Page 14, the 2nd paragraph of this Section: The Plan mentioned that an engineering drawing of the blowoff tank was provided in Appendix G. However, the Appendix G was not found in this VCA Plan. LANL should provide all the relevant information needed to help regulators in decision-making of this VCA Plan.

Section 4.2.2 PRS 0-012:

3. Page 25, 1st paragraph: The plan proposes to take one water sample from inside the blowoff tank and analyze it for the purpose of waste characterization. Didn't LANL take two water samples in the previous RFI investigation? What additional information does LANL need other than that previously acquired? Besides, the original water in tank has been diluted by LANL, therefore, the two sets of water samples are not the same material.



TK

Section 6.2.1 PRS 0-003 and 0-012:

4. Page 33, the 2nd paragraph of this subsection: Please explain the ESH-18 discharge criteria.

PRS 0-030(i)

Section 2.3.3 Results of Previous investigation:

5. Page 18, the last sentence of the page: It states, "These data are summarized in Appendix F, Table F-1." Appendix F is not found in this VCA Plan. Please provide the data.
6. Page 20, the last sentence of the 2nd paragraph: It states, "These data are summarized in Appendix F, Table F-2." Appendix F is not found in the VCA Plan. Please provide the data.