

M E M O R A N D U M

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From: Danny Katzman, DOE Oversight Program

Date: December 16, 1992

Subject: DOE/LANL response to State comments on OU 1078 RFI Work Plan, LANL

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This memo serves to summarize the meeting held to discuss the Hazardous and Radioactive Materials Bureau/DOE Oversight Program comments on the Work Plan for Operable Unit (OU) 1078 (Townsite). The meeting was held on December 14, 1992 in the ERM conference room; attendees were: Albert Dye - ERM, Paula Bertino - ERM, Carl Newton - OU 1078 Project Leader, Steve Slaten - DOE, Jim Aldrich - Programmatic Project Leader for OU 1078, Ron Conrad - EM 8, and Danny Katzman - HRMB/DOE Oversight.

Preliminary results from the Hillside sampling activities show that the drainage at Hillside 140 contains high levels of Uranium (>2000 ppm), heavy metals, semi-volatiles (20 ppm), and PCBs (100s ppm).

Hillside 137 and the Bailey Bridge areas are not showing much contamination.

Septic Tank 138 shows relatively high Plutonium at the top of the channel (beneath the former location of the tank) and predominantly cesium lower in the channel.

Data thus far appears to indicate that collocation of metals, semi-volatiles, and radionuclides occurs.

The next quarterly report will be out soon and will contain as much analytical data as is available.

In response to NMED's concern about the lack of subsurface investigations in Phase 1 of the Work Plan, LANL has proposed, and will submit, a work plan for a fairly extensive subsurface investigation in FY 1993.

The area considered to have the highest priority for subsurface investigations is the area around the D-Building (part of Hillside 137 Aggregate G). The area proposed for the subsurface investigation contains 9 SMWUs. It is considered the highest priority because it was the most contaminated site prior to Alhquist's 1975-76 remediation.

In general, Carl Newton is moving away from the aggregate concept because of the need to investigate SWMUs on an individual basis.

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The second highest priority site is the former location of the TU and TU-1 Building. 5 or 6 SWMUs are in the area. Radioactive materials that were stored in drums at the site would occasionally spontaneously combust. The fires were extinguished with water resulting in high concentration of uranium, maybe up to 12 feet deep. These activities are probably the source of contamination at Hillside 140.

In January 1993, LANL will submit a "Phase 1, Step 2 Work Plan" that will provide all the details of the proposed subsurface investigation.

This additional subsurface investigation will cause LANL to extend the deadlines for reporting requirements as laid out in the Phase 1 Work Plan.

The Los Alamos Inn is planning to do construction in an area immediately on top of a SWMU. Construction is scheduled to begin in March. LANL stated that they can not force the delay of construction, therefore, the SWMU would need to be investigated prior to initiation of construction. The State and EPA will likely not have time to review and approve the sampling plan prior to implementation.

The LANL Risk Team and the Decision Team are working on the exposure unit idea and its applicability to investigations and restoration. They will ultimately produce a table for correlation of an action level to a particular scenario. The DQO people need to know what defines a hot spot, what use-scenarios will be applied, what action levels (both trigger and remediation levels) apply so that they can create statistically significant sampling plans.

Attached is a set of notes/questions that LANL is attempting to address internally as part of their program policy. The NMED should also address these questions both as a review of LANL policy and as components of our own internal policy.

cc: Neil Weber, Chief, DOE Oversight Bureau
Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau
Bruce Swanton, Manager, DOE Oversight Program
John Parker, Manager, Mixed Waste Program
Barbara Driscoll, EPA Region 6
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