

Subject: CCNS Comments on the SFAC Interim Action Plan

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To: john_young@nmenv.state.nm.us

August 28, 2001

John Young
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Re: Comments on Los Alamos National Laboratory's Interim Action Plan for the South Fork of Acid Canyon, LA-UR-01-4538

Dear John:

Thank you for your time this morning to discuss the Interim Action Plan for the South Fork of Acid Canyon. Concerned Citizens for Nuclear Safety (CCNS) makes the following comments on the report:

1. What does the term "interim" mean in the context of this report?
2. Section 1.1 Purpose and Scope. The Interim Action Plan is "to reduce potential radiation doses to recreational users." It is unclear what scenario the recreational user refers to. In the April 27, 2000 Interim Report on Sediment Contamination in the South Fork of Acid Canyon, the Department of Energy (DOE) released the results of five reasonable maximum exposure scenarios: the resident, Laboratory worker, construction worker, trail user (supplemented by the extended backyard), and resource user. The recreational user is not one of the scenarios analyzed.
3. Section 1.2 Rationale for Proposed Corrective Action. DOE's As Low As Reasonably Achievable (ALARA) guidelines require that "[a]ctivities that involve low doses are more likely to be based on judgmental decisions. In cases where dose increments are very low compared to the dose limits, the social and political considerations often will be the dominant factors in arriving at the ALARA decision. (DOE 1997a, p. 21 (DOE-STD-ALARA1 draft). DOE has not considered the social and political factors in its South Fork of Acid Canyon (SFAC) cleanup decisionmaking process. DOE has not considered the impacts of leaving radionuclides and hazardous chemicals in the SFAC on those living downwind and downstream. The input of the Northern New Mexico Citizens Advisory Board and the County of Los Alamos does not constitute the voice of those living downwind and downstream of the SFAC.

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3. Section 2.2 Previous Field Investigations. CCNS would appreciate receiving copies of the July and August 2001 sampling results.
4. Section 4.1 Conceptual Model. Fifth paragraph: DOE should be required to list americium as a gamma-emitter.
5. Section 4.2 Supplemental Data Collection. Third paragraph: Where is the off-site laboratory that analyzed the isotopic plutonium?
6. Section 5.0 Confirmatory Sampling. Fourth paragraph: The analyte suite should include americium-241 and cesium-137.
7. Section D-1.0 Evaluation Criteria. The criteria should include those living downwind and downstream from the SFAC.
8. Section D-1.1 Environmental Impacts Caused by Remedial Alternative. The impacts should include contamination to surface and groundwater, sediment and air and those living downstream and downwind from the SFAC.
9. Section D-1.5 Worker and Public Health. Measures should be included to protect the air, sediment, surface and groundwater, and those living downstream and downwind from the SFAC.
10. Section D-3.3 Cover/Barrier. It is unclear the source for the goal to keep the area as natural as possible. Please clarify.
11. Section D-3.6 Hand Removal. It is unclear if the workers will be required to use personal protective equipment. Please clarify.
12. Section D-3.7 Sediment Vacuuming. It is unclear if the worker will be required to use personal protective equipment. Please clarify.

In addition, CCNS recommends the following:

1. The Interim Action Plan work should be delayed until we hear from Senator Bingaman about the proposed \$2 million appropriation for the complete cleanup of the South Fork of Acid Canyon.
2. The Interim Action Plan work should be delayed until after the Labor Day weekend. The Interim Action Plan work should be delayed until monsoon season is over.
3. NMED should prohibit the Los Alamos municipal swimming pool from discharging into the SFAC during the cleanup.
4. NMED should conduct air, sediment and surface and groundwater sampling during the cleanup and afterwards in order to track contaminant movement. NMED should post the results on the NMED website.

Should you have any questions regarding our comments, please contact me.

Sincerely,

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