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March 17, 1993

Mr. Jerry Bellows, Manager
 Department of Energy
 Los Alamos Area Office
 528 35th Street
 Los Alamos, New Mexico 87544

2366
 TA-02

Subject: Enhanced environmental monitoring as part of Omega West Reactor restart plans

Dear Mr. Bellows:

Daily meetings of the Omega West Reactor (OWR) Recovery Team have been regularly attended by a representative of the New Mexico Environment Department (NMED) Agreement in Principle (AIP) Program. The purpose of our attendance is to assure that environmental issues of concern to the NMED are addressed as part of the "restart" plans for the reactor. At one of the first meetings held, it was determined by the Recovery Team that two documents would be written that reflect historical information (Document 1), and specific recovery plans (Document 2). At the recommendation of the NMED, a task was added to Document 2 to address "long-term environmental surveillance" in Los Alamos Canyon. The principle contact for the task is Mr. Steve Rae at EM-8. After discussions with NMED/AIP staff, Mr. Rae agreed to formulate the needs for the surveillance task with input from NMED as well as in coordination with the Environmental Restoration Program (Pat Longmire, INC-9, is the Operable Unit Project Leader for OU 1098 which includes TA-2 and the OWR). To date these interactions have not occurred.

During the week of March 8, Mr. Rae submitted estimated costs for a level of enhanced environmental surveillance in Los Alamos Canyon that is apparently deemed adequate by EM-8 for OWR restart needs. The budget proposal appears to cover the cost of between two and four additional alluvial monitoring wells in Los Alamos Canyon down gradient of the OWR with a possible contingency for two unspecified "deep" wells at some time in the future. We agree with the need for additional alluvial monitoring wells in the canyon; however, aspects of the deeper parts of the hydrogeologic system in the immediate vicinity of the OWR are poorly understood and deep wells should be considered an integral part of OWR restart needs. Specifically, the role of the Guaje Mountain Fault zone, which trends directly through and immediately east (downstream) of the OWR, has never been evaluated. Given the perennial flow conditions in upper Los Alamos Canyon, the fault zone may be acting as a conduit for downward migration of water from Los Alamos Canyon. At present, no deep wells are optimally located for monitoring the main aquifer for the environmental impacts of operations at the OWR.



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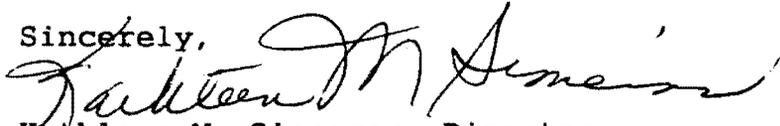
Recent data provided by the Recovery Team indicates that the leak from the OWR has likely been occurring since 1977 and possibly since 1958. The NMED feels that monitoring wells designed and located for the purpose of determining whether the Guaje Mountain Fault provides a pathway for downward migration of contaminated water is essential to any confident assessment of the impacts from past operations (and the long-term leak) at the OWR and to protect the environment in the event that the reactor is brought back on line.

Please provide a timely response to this concern as the above mentioned budget was sent to the DOE for consideration on March 9, 1993.

NMED also requests the DOE to document that the installation modifications of the OWR ensure that its design and refitting will address the existing problems and ensure that these are not repeated. Please be advised that NMED intends to obtain the services of an independent contractor to review the proposed plan modifications. Toward this end please transmit these plans to NMED when they become available.

If you have any questions regarding this issue, please contact Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau at 827-4359.

Sincerely,


Kathleen M. Sisneros, Director
Water and Waste Management Division

KMS/dk

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