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John Parker / File



Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

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DOE OVERSIGHT BUREAU

LANL TH-15 (DARHT)

Gedi Cibas, Ph.D.
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502

Dear Dr. Cibas:

Thank you for your May 22, 1997 letter commenting on the Concurrence Draft of the Mitigation Action Plan (MAP) Annual Report for the Dual Axis Radiographic Hydrodynamic Test Facility (DARHT). We continue to appreciate the New Mexico Environmental Department's interest in the Los Alamos Area Office's (LAAO) National Environmental Policy Act (NEPA) program. We are in the process of reviewing the comments we received on the Concurrence Draft MAP Annual Report and expect to incorporate most of these in the first MAP Annual Report (MAPAR) next year.

In your letter, you asked several questions and made some observations and comments that I would like to briefly address. In my response to your comments, I will refer to your letter by the number order of the paragraph in which the comment appears.

Fourth Paragraph: A description of how the general funding for the MAP is attained is included in the MAPAR. DOE has committed to fund the mitigative actions for the DARHT project as part of the NEPA Record of Decision for the construction stage and thereafter for the operational duration of the facility. We will consider adding information to MAPAR about funding dollars earmarked specifically for the DARHT facility mitigation actions, but I'm uncertain at this time exactly how meaningful this can be made for any individual stakeholder given the range of activities included under the MAP for any given year.

Fifth Paragraph: The DOE LAAO NEPA Project and Facility Representative staffs will provide monitoring and evaluation of the success of mitigative actions expressed in the MAP. There is no commitment in the DARHT Environmental Impact Statement (EIS), Record of Decision, or the MAP to have independent real-time monitoring of mitigation activities. The MAPAR itself serves as the general public's and stakeholder's vehicle for "monitoring" the prior year's activities for commitments made in the MAP.

Sixth Paragraph: Compliance with 40 CFR part 61 subpart H will be addressed as part of the on-going Los Alamos National Laboratory (LANL) Air Quality Monitoring program. There were no specific mitigations for anticipated adverse air quality conditions identified in the DARHT EIS. Engineering designs will be incorporated into the facility and the test apparatus such that releases of particulate material will be mitigated before they reach the environment. Generally, these types of mitigations that are an integral part of a project are not called out separately in a MAP.



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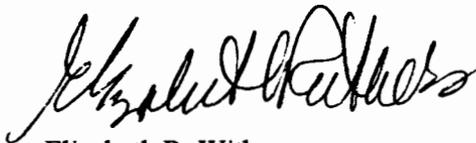
Dr. Gedi Cibas

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Seventh Paragraph: The issue of potential impacts to groundwater was addressed in the analyses provided in the DARHT EIS; specifically chapter 5.0 and Appendix E. In chapter 5.0, the results of the modeling indicated that not only would it take thousands of years for a given contaminant to reach the groundwater, but the concentration in the groundwater would be well below action limits. LANL has now initiated an extensive laboratory-wide groundwater monitoring program. According to current plans, there will be three monitoring wells located in the main drainage adjacent to the DARHT facility; one will be located upstream, one directly adjacent, and one downstream from the DARHT facility. Therefore, groundwater will be monitored near the DARHT facility, although this monitoring is being conducted under another program and not as part of the DARHT MAP. We will consider including information obtained from that program into the MAPAR as additional information when the wells have been installed and sampling and analysis begins; it may be several years, however, before these analytical results become available.

I appreciate both your comments and your support of the LAAO NEPA program. I hope this letter has further clarified some of your comments regarding DARHT MAP and MAPAR. If you would like further information regarding the MAP or the MAPAR, please call Dean Triebel, Office of Environment and Projects, at (505) 665-6353. If you have any questions regarding our LAAO NEPA program, please call me at (505) 667-8690.

Sincerely,



Elizabeth R. Withers
NEPA Compliance Officer
Office of Environment and Projects

LAAMEP:2EW-412

cc:

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