

TA15

LANL WF



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COPY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

June 17, 1997

Mr. G. Thomas Todd, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

**RE: Notice of Deficiency
Interim Action Plans for TA-15
15-007(c), 15-004(f), and 15-008(a)
Los Alamos National Laboratory (NM0890010515)**

Dear Mr. Todd:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the Department of Energy/Los Alamos National Laboratory's (DOE/LANL) Interim Action Plans for Technical Area 15, PRSs 15-007(c) [Attachment A], 15-004(f), and 15-008(a) [Attachment B] referenced by EM/ER: 97-123 and dated April 21, 1997. These Interim Action Plans were found to be deficient. NMED HRMB requires that DOE/LANL respond within thirty (30) calendar days to the specific deficiencies outlined in Attachments A and B.

Should you or your staff have any questions concerning this Notice of Deficiency, please contact myself or Mr. John Kieling, HRMB's LANL Facility Manager, at (505) 827-1558.

Sincerely,

Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

BJG:jry

attachments



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cc: T. Davis, NMED HRMB
R. Dinwiddie, NMED HRMB
T. Glatzmaier, LANL DDEES/ER, MS M992
K. Hill, NMED HRMB
J. Jansen, LANL ER Project, MS A316
M. Johansen, DOE LAAO, MS A316
J. Kieling, NMED HRMB
M. Leavitt, NMED GWQB
D. McInroy, LANL EM/ER, MS M992
D. Neleigh, EPA, 6PD-N
J. Parker, NMED DOE OB
S. Pierce, NMED SWQB
G. Saums, NMED SWQB
T. Taylor, DOE LAAO, MS A316
S. Yanicak, NMED DOE OB, MS J993
J. Young, NMED HRMB
File: LANL HSWA 2/1086/15
Track: LANL, 6/17/97, n/a, DOE/LANL, HRMB/jry, RE, file

ATTACHMENT A
Technical Comments

Interim Action Plan for Removal of Visible Lead Shot
Near PRS 15-007(c), Shaft
April 1997

General Comments:

1. Please clarify if this Interim Action (IA) is intended to be a final remedy for this Potential Release Site (PRS).
2. Los Alamos National Laboratory (LANL) shall provide a more detailed summary of the site history, proximity to a water course (site map), in addition to any sampling and analyses which occurred prior to this IA.
3. LANL shall provide the field screening methodologies used to determine the presence or absence of contamination confirmed by fixed laboratory analyses. LANL shall also provide documentation that appropriate quality assurance-quality control (QA/QC) procedures were adhered to for field screening.

Specific Comments:

Section 1.0 Site Description:

4. Please clarify and provide documentation for the nature of and constituents involved in the explosive testing at the shaft.

Section 3.1 Description:

5. LANL shall discuss all variances to this IA Plan in the IA Completion Report. If contamination of the lead shot or surface soils is discovered, additional revisions/new sampling analysis plan (SAP) is required to address the soil contamination.
6. LANL shall conduct a visual inspection down the canyon wall (for a reasonable distance) to ensure that no lead shot has been transported off site.

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7. If surface soils are disturbed as a part of this IA, LANL shall make provisions for the implementation of appropriate best management practices (BMP).

Section 6.1 Method of Management and Disposal:

8. LANL shall provide a complete report to the administrative authority detailing the final dispositions and quantity of IA-generated wastes.

Section 7.0 Schedule:

9. Please clarify the reasons for the delay of the implementation of this IA Plan (start date October 1997).

ATTACHMENT B
Technical Comments

Interim Action Plan for PRSs 15-004(f); Firing Sites C, E, and F;
and 15-008(a), Surface Disposal
December 1996

General Comments:

1. Los Alamos National Laboratory (LANL) shall provide a more detailed summary of the site history, proximity to a water course (site map), in addition to any sampling and analyses which occurred prior to this IA.
2. LANL shall provide quality assurance-quality control (QA/QC) documentation and detection limits for the field screening methodologies used.
3. Due to the proximity of 15-004(f) and 15-008(a) to water courses, LANL shall install and provide documentation for appropriate BMPs to control debris/contaminant transport offsite.

Specific Comments

Section 1.0 Rationale and Objective of Interim Action:

3. LANL shall document in the IA Report, the high explosive (HE) screening methodology, how much HE was discovered, and where it was disposed (if HE is discovered).

Section 2.0 Site Description and Characterization Data:

4. Please clarify how much depleted uranium (DU) and natural uranium was "expended" at 15-004(f). The IA Plan indicates 48 and 22 tons of natural uranium and DU were expended respectively, however; the Characterization Strategy Form (Interim Action Plan, p. 1) indicates roughly 43,000 kg natural uranium and 20,000 kg of DU was expended; and the 10/30/95 1086 RFI Report states 72 tons (Section 1.1, p. 1-1).
5. Please clarify what activities will be performed at PRS 15-008(a) as part of this IA.

Statements regarding 15-008(a) activities in Section 2.0 of the IA and the Characterization Strategy Form (page 1, Characterization Strategy Form; Interim Action Plan) are unclear.

Section 3.1 Description:

6. If surface soils are disturbed as a part of this IA, LANL shall make provisions for the implementation of appropriate best management practices (BMP).

Section 6.1 Method of Management and Disposal:

7. LANL shall provide a complete report to the administrative authority detailing the final dispositions and quantity of IA-generated wastes.

Section 7.0 Schedule:

8. LANL performed a remedial action on approximately 30,000 square feet of contaminated soil. LANL shall clarify if this remediation was performed as a part of this IA. If so, LANL shall provide more detailed information as to the sampling, removing, and disposal activities that were/are being performed. If not, LANL shall provide the title of the document which guided the soil remediation activity.