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 Los Alamos Area Office, MS A316
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Stu

Date: September 12, 1997
 Refer to: EM/ER:97-373



Dr. Robert Dinwiddie
 NMED RCRA Permits Manager
 P.O. Box 26110
 Santa Fe, NM 87502

**SUBJECT: RESPONSE TO THE NOD FOR IA PLANS FOR TA-15
 (FORMER OU 1086)**

Dear Dr. Dinwiddie:

The purpose of this letter and enclosure is to respond to your letter of August 29, 1997. This letter was received by Los Alamos National Laboratory on September 2, 1997. The enclosure addresses your comments provided to us in your June 28, 1997, Notice of Deficiency (NOD). Please note that Attachment A in our response will be provided within 30 working days. While we are providing this information, we continue to have reservations about the appropriateness of the New Mexico Environment Department's use of the NOD mechanism to request information on sites where the Laboratory is performing voluntary actions.

We are interested in discussing this issue further with you at one of our regularly scheduled monthly meetings, if you feel this is an appropriate agenda item. Should you have questions pertaining to this response, please contact Dave McInroy at (505) 667-0819 or Joe Mose at (505) 667-5808.

Sincerely,

Jorg Jansen, Program Manager
 LANL/ER Project

Sincerely,

Theodore J. Taylor, Program Manager
 DOE/LAO

JJ/TT/ss

- Enclosures: (1) Response to the NOD for IA Plans for TA-15 (Former OU 1086)
 (2) Certification



TU

Cy (w/encs):

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D. Griswold, AL-ERD, MS A906
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EM/ER File, (CT# C302), MS M992
RPF, MS M707

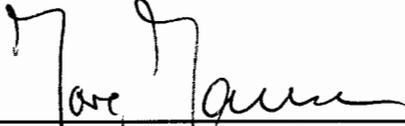
Information Only:

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EM/ER File, MS M992

CERTIFICATION

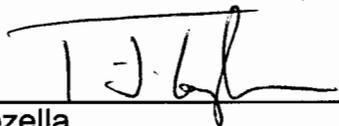
I certify under penalty of law that these documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Document Title: Response to the NOD for IA Plans for TA-15 (Former OU 1086)

Name:  Date: 9-12-97
Jorg Jansen, Program Manager
Environmental Restoration Project
Los Alamos National Laboratory

or

Tom Baca, Program Director
Environmental Management
Los Alamos National Laboratory

Name:  Date: 9/12/97
Joseph Vozella,
Acting Assistant Area Manager of
Environmental Projects
Environment, Safety, and Health Branch
DOE-Los Alamos Area Office

or

Theodore J. Taylor, Program Manager
Environmental Restoration Program
DOE-Los Alamos Area Office

**RESPONSE TO NOD FOR
INTERIM ACTION PLANS FOR TA-15
15-007(c), 15-004(f), AND 15-008(a)**

ATTACHMENT A, Technical Comments

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

GENERAL COMMENTS

NMED Comment:

1. *Please clarify if this Interim Action (IA) is intended to be a final remedy for this Potential Release Site (PRS).*

LANL Response:

There is confusion about the numbering of this PRS. The PRS numbered 15-007(c) is a subsurface shaft. This IA plan is intended to remedy the lead shot on the surface of the ground near PRS 15-007(c), but it is not intended to be a remedy for PRS 15-007(c). Los Alamos does not intend on any interim action as being a final remedy. By definition, VCAs and VCMs can lead to final remedies but not IAs or BMPs.

NMED Comment:

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.*

LANL Response:

The only information available concerning the lead shot is contained in Figure 5.3-4 of the RFI work plan (LANL 1993,1088) and in the NOD response to the RFI work plan (Jansen 1994, ER ID No. 40595). The figure caption reads, "A few small pieces of lead shot are visible around PRS 15-007(c)." EPA's comment and LANL's response follow:

EPA: *"Figure 5.3-4, p. 5-11 - LANL shall explain why lead shot is found at the surface of 15-007(c)."*

LANL Response: *"Lead shot is not used as part of the backfill. However, bags of lead shot are often used to shield instruments during an explosive test. Apparently a bag was broken and the lead shot accidentally spread around. This lead shot will be gathered and disposed of properly."*

This site is approximately 500 ft in a vertical direction from Three Mile Canyon and about 150 ft in a horizontal direction, i.e. the site is on a mesa top (see Attachment A).

There have been no previous sampling and analyses conducted at this site.

NMED Comment:

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.*

LANL Response:

Agreed. This information will be provided in the final IA or NFA report for this unit.

SPECIFIC COMMENTS

NMED Comment:

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.*

LANL Response:

Information regarding the nature of and constituents involved in the explosive testing at the shaft have been provided in the RFI work plan and in the NOD responses to the work plan. Section 5.3.5.1 of the work plan states that a one-time test at PRS 15-007(c) involved 2 tons of HE detonated at approximately 130 lbs. The shaft was backfilled with magnetite, Cal-Seal cement, sand grout, bentonite, sand, and gravel prior to detonation.

NMED Comment:

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.*

LANL Response:

Agreed. Although it is still undecided whether the information resulting from this action will be reported in an IA completion report or an NFA report. These reporting mechanisms are still being discussed with your bureau.

NMED Comment:

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.*

LANL Response:

Agreed.

NMED Comment:

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).

LANL Response:

Agreed.

NMED Comment:

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.

LANL Response:

Agreed. This information will be provided in the appropriate completion report.

NMED Comment:

Section 7.0 Schedule:

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

LANL Response:

LANL believes there is a typographical error in the HRMB NOD, which states that the implementation is scheduled for October 1997. The plan is currently scheduled for implementation in 1999 not in 1997. The start date is placed in 1999 because the plan has not been approved by LAAO.

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

NMED Comment:

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.*

LANL Response:

There are approximately 23 pages of information regarding E-F Site in Chapter 7 of the RFI work plan. An additional six pages of information are provided in Chapter 4. There are also 35 pages of information about E-F Site in the RFI report dated November 1995. NMED personnel toured E-F Site on December 19, 1996 for a detailed observation of the site. There is too much information regarding this site to be included in the IA plan. Section 2 of the IA plan summarizes the problem: there are pieces of visible depleted uranium (DU) on the surface of the site that will be removed as an interim action to mitigate further movement of this contaminant from the site. The site is approximately 500 ft from the head of Potrillo Canyon (see Attachment A).

NMED Comment:

2. *LANL shall provide quality assurance-quality control (QA/QC) documentation and detection limits for the field screening methodologies used.*

LANL Response:

Agreed. This information will be provided in the final IA or NFA report for this unit.

NMED Comment:

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.*

LANL Response:

This site will be evaluated and prioritized using LANL's AP 4.5 procedures and BMPs will be installed upon review of those results.

SPECIFIC COMMENTS

NMED Comment:

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).*

LANL Response:

HE will be screened by visual examination only. Because this IA is not an intrusive activity, HE spot test for safety concerns is not required. LANL agrees to record how much HE is discovered and where it will be disposed of (if any is discovered) in the appropriate final report.

NMED Comment:

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).*

LANL Response:

The approved RFI work plan states that an estimated 43,000 kg of natural uranium was expended. This converts to 47.4 tons, which was rounded to 48 tons for the IA plan summary. The approved RFI work plan states that an estimated 20,000 kg of DU was expended. This converts to 22.0 tons of DU, which was rounded to 22 tons. The two sets of figures are conversions of one another. In Section 1.1 of the RFI report, the figure of 72 tons of all uranium expended is a typo. Adding 48 and 22 equals 70 tons, not 72.

NMED Comment:

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.*

LANL Response:

Actions at PRS 15-008(a) are the same as those at PRS 15-004(f): removal of visible uranium and visible HE as described in Section 3 of the IA plan.

NMED Comment:

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).*

LANL Response:

Agreed.

NMED Comment:

Section 6.1 Method of Management and Disposal:

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

LANL Response:

Agreed. This information will be provided in the appropriate completion report.

NMED Comment:

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.*

LANL Response:

The activity referred to is exactly the same as proposed in this IA. As described to the HRMB personnel during the December 19, 1996 site tour, LANL personnel performed a small portion of this IA in the fall of 1996 (approximately 30,000 square feet of the approximately 250,000 square feet total). This work was accomplished while LANL and DOE were discussing the details and implementation of this IA plan. Sampling did not take place. Removal of obvious pieces of uranium and removal of pieces of radioactively contaminated scrap metal, wire, etc., took place. Because of the heavy snow fall during the winter, the site has not been revisited. It is planned to return to this IA after the 1997 summer VCA work is complete. Radioactive waste has been placed in temporary non-RCRA storage onsite, in sealed containers in a radioactive materials storage area. Again all of the information will be supplied to you in the appropriate documentation as agreed upon by NMED and LANL.

References:

LANL (Los Alamos National Laboratory), June 1993. "RFI Work Plan for Operable Unit 1130," Los Alamos National Laboratory Report LA-UR-93-1152, Los Alamos, New Mexico. (LANL 1993, 1088)

Jansen, J., August 24, 1994. "Notice of Deficiency (NOD) Response for Operable Unit (OU) 1086 Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan," Los Alamos National Laboratory Letter ER:94:J351, ER ID Number 40595, Los Alamos, New Mexico. (Jansen 1994, ER ID No. 40595)