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9-30-94 ; 8:24 ; NM ENVIRONMENT DEPT

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DATE: 9-30-94 TIME: 9:30 A PAGE 1 OF 5

PLEASE DELIVER THE FOLLOWING PAGE(S):

TO: JOHN PARKER

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FROM: GEORGE CIBAS

LOCATION: New Mexico Environment Department

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COMMENTS:



5954



MEMO

DATE: 23 September 1994

TO: Gerald Silva

FROM: MP Bumsted



Solid Waste Bureau, ext. 2949

SUBJECT: NMED File # 856ER—Draft Environmental Assessment for UC-LANL (Weapons Component Testing Facility Relocation)

A Finding of No Significant Impact (FONSI) *should not be issued.* There is only 1 positive impact of this project: to enable a larger (and taller) hydraulic press to be used. There are several negative impacts to the relocation or the new construction alternatives, at least one of which is Mega but nevertheless not mentioned in the EA. Because of this latter, this project should be evaluated as part of the Site-wide Environmental Impact Statement.

The overt purpose of the proposed project (relocation of a nuclear weapons component pressure/stress lab) as inferred from the EA seems to be to save a few steps (about 2/10ths of a mile) between customers (who are not allowed in the testing lab anyway) and the testing lab. ["the overall square footage used would be the same."] The need for a taller bay area for installation of a larger hydraulic press can be accomplished by remodeling the existing building. As mentioned in the EA, new construction would indeed be a major environmental detractor, e.g., disturbance of cultural resources in this rich area, noise, wildlife habitat, run-off, etc. No evidence is given for why existing conditions hinder *efficiency, productivity, increased capability, or consolidation.*

However, relocation and expanded capacity would make sense in order to bring the work which was done at Rocky Flats (now closed) to LANL. The need to test aging weapons is critical and will continue even with a smaller arsenal. The decommissioning and reprocessing of superannuated weapons must continue also (Kirtland AFB is now one of the first stores of weapons returned from the European stockpile). But moving these operations to LANL means a significant change in Laboratory actions that an EA cannot address. The WCTF is an essential part of this change.

Primary direct negative effects of the operation (testing) *per se*, may stem from the analysis and preparation of beryllium (Be); from welding gases, from flying debris, and from gases/shrapnel emanating from explosive testing of actuator valves. There will be construction debris for disposal; there is no mention of what will become of the old building.

The actuators arrive in stainless steel, reinforced drums, about the size of a 35- or 55-gal drum. The transportation of these weapons components is quite safe. The actuators are transferred to the testing lab in these containers which obviously must have motorized transport (from the EA, it sounded like they were hand carried by folks too lazy to walk a brief distance). Overall, the

handling and testing of actuators should be O.K. However, it is not sufficiently clear to me that the fugitive debris from handling, distorting, grinding, etc. will be safely contained. [In other areas of LANL where Be and HE (high explosives) and D-38 have been used in weapons testing, I believe the residues have dripped through the test shack floors (Be stalactites) or scattered over the surface (D-38).]

- How long will Be and D-38 be stored? (pg. 8, ¶1) what is the expected "lifetime" of the facility? (pg. 14)
- Where does discharge from wet grinding go?
- Are the work areas cleaned up? Where does the unclean stuff go?
- Is there venting for the enclosed rooms (welding by-products)?
- The actuator tests are to be done in a "containment box"—where is this box in Fig 2? how is it to be vented from explosion gases (rest of page 6 text missing)? what about noise produced? where is the detonation now occurring? [a previous effort to add to S-site's explosives testing (impact of sound on Army troop performance) was stopped because of significant negative impacts to Bandelier National Monument.]
 - Many structural integrity tests rely on radioactive or other high energy instruments, e.g., gamma radiography, neutron radiography, XRF. Will any of these analytical methods be employed?
 - The new location will be closer to the main (only) public highway. How will transportation of actuators or samples be affected?
 - Where is sample management done? where do "customers" interface the facility? any preliminary screening for 'hot' samples? is this needed? why would remodeling of existing building to hold new press not "consolidate" the operations (pg. 9, l 30-40)?

Section 4.2.1 lists *Environmental Resources Not Affected*. Because no discussion is given, I would like to see an evaluation of why the following will not be affected—air quality [see above re: ventilation]; rad and haz waste management; critical habitat [this area is a wintering area for elk and deer and the only migratory connection to the Valle Grande]; pre/historic sites [previous archaeology and survey would not be sufficient by today's standard. Given the importance of the Pajarito Plateau for human development and the 50-year+ security and isolation protection from wide-ranging economic development, recreation, and construction, even a building extension could affect undisturbed pre-LANL information]; recreational resources (Bandelier); noise; and scenic resources.

effects on and with *proposed expansion* of Area G (highly sensitive issue; especially to Pueblos) not discussed

hydrology misleading

where and how does inspection occur? (pg. 15, lines 20-30)

SARA Title III? no LEPCs; northern Pueblos left out of emergency response readiness

why not move to Sandia NL, next to Kirtland?

NB—wording of Executive Summary, pg. ii, emphasis added.

"No changes in *current* operations of the WCTF are anticipated as a result of the relocation: no *new* waste would be generated in the operations after the relocation. The relocation would not change the quantity of *sanitary* effluent. Some renovations to Building 207 would take place in the relocation...."



MEMO

DATE: 26 September 1994

TO: *Leslie C. Chis*
~~John Geddie~~

THRU: Gerald Silva

FROM: M. Pamela Burnsted, Ph.D. *mpb*

 Solid Waste Bureau, ext. 2949

SUBJECT: Questions to ask about NMED File # 856ER—Draft Environmental Assessment for UC-LANL (Weapons Component Testing Facility Relocation), based on 23 Sept 94 memo (Site-wide EIS meeting this Wed and Thurs PM in Santa Fé)

- Why isn't this project included in the Site-wide EIS?
- Why isn't there any mention of related projects/actions or of the context of this project within overall LANL plans and programs?
- Why and how do existing conditions hinder "efficiency", "productivity", "increased capability", or "consolidation"?
- Is this project appropriate to solve the actual problems?
- What alternative actions are there? The EA discusses only one alternative, i.e., to build or not to build. What alternative analyses are there? alternative methods? alternative processes? [Is there a need for a building of any kind?]
- What is the urgency in this project?
- Why won't a two-story, reinforced floor, add-on to the existing building work?
- Why is commercial work done here (pg. 1, § 1.2; pg. 5 lines 20-30)? What responsibilities do Boeing, McDonnell-Douglas have (e.g., financial assurance, monitoring)? How does commercial, for-profit work fit into a nuclear weapons project (e.g., waste, clean-up, chemicals, regulations, responsibility)?
- How does this project fit into the future program (Programmatic EIS) for the nuclear weapons complex? What does Rocky Flats have to do with this project?
- What is the anticipated rate or volume of additional work (how fast will the stockpile decrease, decommissioning increase)?
- How long does LANL anticipate the need for increased capability? Does increased capability mean increased capacity? Any new personnel associated directly or indirectly with the project, i.e., will increased capability mean a need for additional people moving into Los Alamos County (and associated environmental burden)?

- If the same number of people are required even though an increased capability, will safety or environmental protection be degraded?
- What will become of the old building over the short-term, long-term?
- How will fugitive debris from handling, distorting, grinding, etc. be contained?
- How long will Be and D-38 be stored? (pg. 8, ¶1) what is the expected "lifetime" of the facility? (pg. 14)
- Where does discharge from wet grinding go?
- Are the work areas cleaned up? Where does the unclean stuff go?
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- The actuator tests are to be done in a "containment box"—where is this box in Fig 2? how is it to be vented from explosion gases (rest of page 6 text missing)? what about noise produced? where is the detonation now occurring? [a previous effort to add to S-site's explosives testing (impact of sound on Army troop performance) was stopped because of significant negative impacts to Bandelier National Monument.]
- Many structural integrity tests rely on radioactive or other high energy instruments, e.g., gamma radiography, neutron radiography, XRF. Will any of these analytical methods be employed?
- Where is sample management done? where do "customers" interface the facility? any preliminary screening for 'hot' samples? is this needed? why would remodeling of existing building to hold new press not "consolidate" the operations (pg. 9, ¶ 30-40)?
- How will components be transported to site and within the site? Any effect on the nearby (and only) public highway off S-site and Plateau?
- Section 4.2.1 lists *Environmental Resources Not Affected*. Why will the following not be affected—air quality [see above re: ventilation]; rad and haz waste management; critical habitat [this area is a wintering area for elk and deer and the only migratory connection to the Valle Grande]; pre/historic sites [previous archaeology and survey would not be sufficient by today's standard; even a building extension could affect undisturbed pre-LANL information]; recreational resources (Bandelier); noise; and scenic resources?
- What are the project's actions/effects on and with the **proposed expansion** of Area G (highly sensitive issue; especially to Pueblos)?
- Why is hydrology misleading (c.f., tritium and Pu contamination problems at LANL; insufficient understanding of hydrogeology; no deep well off-site data)?
- Where and how does inspection occur? (pg. 15, lines 20-30)?
- What is the effect(s) of consolidated, increased capability on SARA Title III? How will this project mitigate the current negative effects of having no LEPCs in northern NM; of having the primary law enforcement outside Los Alamos County still left out of emergency response readiness?
- Why not move to Sandia NL, next to Kirtland? or to Pantex?

Nota bene—wording of Executive Summary, pg. ii, emphasis added.

"No changes in *current* operations of the WCTF are anticipated as a result of the relocation: no *new* waste would be generated in the operations after the relocation. The relocation would not change the quantity of *sanitary* effluent. Some renovations to Building 207 would take place in the relocation...."

cc: Jim Condiss, SWB