

**ENVIRONMENTAL RESTORATION PROJECT
TELEPHONE COMMUNICATION RECORD**

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| Date: 10/9/02 | Time: 9:00 AM | PM | Recorded By: Kelly VanDerpoel |
| To: Vickie Maranhville | From: Kelly VanDerpoel | Telephone No: 667-2172 | |

Affiliation: NMED HWB, 428-2546

Other Parties:

None.

Discussion:

The purpose of this call was to discuss Vickie Maranhville's comments to the MDA P Closure Certification Report Draft Outline. The outline had been provided to Vickie via e-mail on 9/26/02. She provided comments to LANL via fax on 10/2/02.

Kelly VanDerpoel agreed that LANL would revise the outline to provide additional details as to the contents of each section, and resubmit the outline to her. The following points were discussed for clarification, in order of their occurrence in the draft outline:

Title of report: the title needs to be modified so that it is clear that three sites are addressed in the report. This is to facilitate inquiries from the public concerning any of the three sites.

Appendices:

Appendix A – PRS 16-016(c)-99 VCA Completion Report – HWB expects a complete report. LANL intends to provide a complete report that follows RRES-R's general format for VCA completion reports, with the understanding that certain information will be presented in summary fashion, with reference to other appendices in the closure certification report for additional details. Vickie agreed that this was appropriate, particularly for referencing the risk assessment in Appendix D. An outline of Appendix A will be provided with the revised closure certification report outline.

Appendices B and C – in her comments, Vickie suggested combining the Phase I and II reports into one appendix (Appendix B) and inquired if a report for the 387 Flash Pad should be provided as Appendix C. Kelly explained that because the Phase I and II reports are completely stand-alone documents, it would facilitate our referencing of each document throughout the report if we kept them separate. Also, the reports are inclusive of the 387 Flash Pad; there is no separate completion report. We have a separate report for the PRS in Appendix A because of the regulatory and programmatic differences between corrective action and closure. The titles of these appendices will be modified to make it clear that the Phase I and II reports are inclusive of all of the sites.

Appendix D – An outline for the contents of this appendix will be included in the revised outline that follows RRES-R's general format for risk information. Section 3.0 of the closure certification report will provide a summary-level discussion and the appendix will contain the full details of the risk assessment.

Appendix E – Kelly explained that this will in fact be part of Appendix D and not a stand-alone appendix. Vickie requested confirmation that all Canon de Valle data used to support the risk assessment is final (Note: this has been confirmed).

Appendix G – A CD containing approximately 80 photos will comprise this appendix. Per Vickie's comment, we will choose a suitable number of photos (8 – 10) that show the progression of closure at the site and include those in the text.

Closure Report contents:

Section 1.0 – Vickie had made suggestions for reorganization of 1.2 and 1.3. (Note: these comments are substantively addressed, but the organization of Section 1.0 has changed based on author's suggestion.)

Section 1.4, Site Description, will be broken into the following three sections: 1.4.1 MDA P; 1.4.2 387 Flash Pad; and 1.4.3 PRS 16-016(c)-99.

Under 1.5 Process Description, Vickie had made a comment to add a section 1.5.3 for PRS 16-016(c)-99, and use it to explain the difference with the PRS; i.e., that the PRS is not a regulated unit and therefore, does not have a process



description in the RCRA TSD sense. Explain that it is a SWMU that has been combined with the regulated units for the purposes of cleanup.

Section 2.0 – as a general comment on this section, there needs to be sufficient detail in the text (as opposed to referencing out to appendices) for HWB to make their decision on whether we have met clean closure. More detail is expected here than in 3.0, where a summary and reference out to Appendix D is appropriate. The pertinent details on completion of closure and variances need to be in the body of the document.

Section 2.1.2 will contain a detailed presentation of the basis for combining the sites and the basis for our clean closure demonstration.

Sections 2.2 and 2.3 – Vickie commented that a discussion of variances should be included for both closure activities and confirmation sampling in those sections of text. She acknowledged that a summary of all variances is already proposed in 2.4, and agreed that we should include it, but any variances that had a significant impact on the course of the closure activities, including schedule, must be discussed in the text of the section. Variances that resulted in improvements in closure performance and data quality should be noted.

LANL will incorporate Vickie's comments on adding the following: 2.3.2 Confirmatory Sampling; 2.3.3 Exploratory Drilling; 2.3.4 Exploratory Well Boring Geophysical Logging; and 2.3.5 Fracture Survey and Mapping (Note: actual numbering may shift). Data Quality was identified in the draft outline as 2.3.2; it will now be in an appendix.

Section 3.0 – The introduction, 3.1, will include a discussion comparable to the strategy discussion in 2.1.2, but with an emphasis on risk. A section summarizing the Conceptual Site Model will be included as 3.2.

Section 4.0 - Per Vickie's comments, risk will be discussed in a proposed section 4.1 of the revised outline, Interpretation of Risk. Site restoration will also be discussed in this section, proposed as section 4.2 – since the details have not yet been finalized, this section will contain a couple paragraphs on the general plans for site restoration. Section 4.0 will also provide a final summary of our clean closure demonstration (Note: actual organization of this section will be 4.2 Final Conclusions and 4.3 Site Restoration.)

Vickie's general comments at the end of her outline markup indicated the following: a clear demonstration must be made in the document as to why the data are sufficient to not enter post-closure care in general, and why groundwater monitoring specifically will not be conducted. The report needs to demonstrate that MDA P is not impacting Canon de Valle.

Action Items:

The MDA P team will revise and annotate the outline, and resubmit to Vickie.

Distribution:

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APPROVED by *W Maranville* 10.23.02

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