Beath Garcia / File (Gd.:)

Janice – good job – please keep on file Bradso

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

MAY 22 1996

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

Re: NMED File No. 985ER

Dear Dr. Cibas:

We have received your letter dated May 10, 1996, commenting on the Predecisional Draft Environmental Assessment (EA) for the Consolidation of Surplus Materials and Machines for Nuclear Criticality Experiments and Training (DOE/EA-1104), proposed for the Los Alamos National Laboratory (LANL), Los Alamos, New Mexico. As always, we appreciate the State's interest in our Los Alamos Area Office's (LAAO) National Environmental Policy Act (NEPA) program and thank you for furnishing comments on the draft EA. The final EA reflects changes made to the text to address comments received from your office and other stakeholders, including a change of title to "Consolidation of Certain Materials and Machines for Nuclear Criticality Experiments and Training." The Department of Energy (DOE) issued a Finding of No Significant Impact (FONSI) for this project and a final Environmental Assessment on May 22, 1996 (copies of the EA and FONSI are enclosed). The decision made was to select the proposed action and proceed with its implementation.

In your letter you asked several questions and made some observations and comments that I would like to address. For convenience, I refer to your comments by number in my responses presented below. Text locations referencing changes to the final EA document are indicated.

#1) Additional text has been added to Section 2.1 of the Final EA to clarify that some criticality experiments are currently being conducted outside the kivas within secure areas at LANL's Technical Area (TA) 18. The description of the proposed action in Section 2.3 has also been modified to reflect that some of the proposed experiments using the Health Physics Research Reactor could take place out-of-doors as well as within the kivas. Chapter 5 of the Final EA has been slightly changed to emphasize that the accident analysis represents a hypothetical situation or scenario and is not based on past accident experience.

#2). Chapters 2.1 and 2.3 of the Final EA have been amended to include additional information and clarification. Although it was our original intent that if other material becomes available in the future for use in criticality experiments or training, the EA might potentially provide an adequate analysis of the effects such that additional NEPA analysis may not be necessary, upon reconsideration we have decided to excise these statements from the EA. If other materials are identified that lend themselves to such use, the EA will be amended to provide adequate NEPA analysis of potential effects and a revised or amended FONSI may result, as appropriate.

The only limits on material inventory for criticality purposes at LACEF are those imposed by either space configuration restraints or administrative and security restraints. The facility use designation as a Category II nuclear facility does not limit the amount of material in the

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inventory. The material proposed to be brought into TA-18 and stored there is very carefully scrutinized to avoid keeping more material on hand than is reasonably needed for facility use. An inventory of materials stored in the kivas is performed routinely. This standard practice would include any new materials brought into the facility.

#3) Spent materials would not be generated by the use of the materials in the Proposed Action. The materials have such a long radioactive half-life that they will not become "spent" in the thirty years of use proposed. At or before the end of the thirty-year period, the materials will be reevaluated to determine if they can be used in some other program or project, or if they should be declared waste and disposed of. Additional text has been added to the EA to clarify this issue in Chapters 2.3 and 4.1.3.

#4) No measurable fission product gases would be emitted from the facility during the conduct of experiments. There might be a minuscule amount of gases (on the order of 10^{-8} moles) trapped in metal as a result of experimentation, but no monitoring or dose/risk is expected from this gas.

#5) Radiological monitoring of the LANL TA-18 area is extensive. External monitoring is part of the LANL-wide air monitoring system, of which a NEWNET monitor is located close to the TA-18 site. The EPA and the State of New Mexico are involved in the oversight of LANL's air monitoring system. Changes in the frequency and duration of monitoring are subject to perceived need and may fluctuate accordingly over time. The Proposed Action should not change the existing number of experiments, nor should it change the radiological setting at TA-18. Since the Proposed Action is not contingent upon the monitoring capabilities at TA-18, it was decided that no additional modification of the EA was required.

I appreciate your support of the LAAO NEPA program; your comments were substantive and much appreciated. I hope that this letter, together with accompanying changes made to the EA, has further clarified some of your comments regarding our proposed action. If you would like further information regarding this project, please call me at (505) 667-5105, or contact Bruce LeBrun, Office of Environment and Projects , at (505) 665-6348. If you have any questions regarding our LAAO NEPA program, please call either me or Elizabeth Withers, NEPA Compliance Officer, at (505) 667-8690.

Sincerely,

for G. Thomas Todd
Area Manager

LAAMEP:6EW-068

Enclosures

cc w/o enclosures:
H. Haynes, Office of Counsel, LAAO
E. Withers, AAMEP, LAAO
B. LeBrun, AAMEP, LAAO
R. Enz, Scientech, LAAO
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