

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

DATE: April 9, 1993
IN REPLY REFER TO: EM-DO:93-344
MAIL STOP: J591
TELEPHONE: (505) 665-3778

Mr. Joseph Vozella
Acting Chief
Los Alamos Area Office, MS A316
Los Alamos, NM 87544

Dear Mr. Vozella:

**RE: SCOPE/SCHEDULE CHANGES TO TECHNICAL REPORTS ON
ACTIVITY DATA SHEET (ADS) 1106**

The Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan for Technical Area (TA)-21 Operable Unit (OU) (ADS 1106) was approved by the Environmental Protection Agency (EPA) in January 1992, after a work plan addendum was submitted in response to EPA's Notice of Deficiency (NOD). The addendum was transmitted in December 1991 through your office. A key aspect of the addendum was a revised schedule for both the sequence of TA-21 field investigations, and the content and timing of technical reports to EPA. Attachment I, excerpted from the work plan addendum, specifies the dates and contents of these technical reports (quarterly reports and Technical Memoranda). Two major reports (Tech Memos 1 and 2) are scheduled for submission to EPA in Fiscal Year (FY) 93, in addition to quarterly reports.

A few issues have evolved over the last 15 months to force us to request guidance from the EPA on the scope and schedules of these technical reports.

First, subsequent to DOE's submission of the NOD response, two circumstances have caused the schedule for the TA-21 RFI to slip significantly. The consequences of the slippage are that the RFI schedule outlined in the NOD response cannot be met, and that reports cannot be submitted on schedule with the full technical content specified in the addendum. These two circumstances are as follows:

- 1) Funding was not received for vadose zone and Area V investigations (scheduled in the NOD response to start in the summer of 1992). Because these investigations could not be started, results cannot be reported as scheduled in Tech Memos 1 and 2 (June 14 and September 29, 1993).

The only recourse for this problem is to reschedule the work for a later time. At present, the summer of 1994 (assuming adequate funding is available in FY94) appears to be the earliest date to start these investigations, giving an earliest reporting date late in FY94. If some additional FY93 funding were available in the very near future, part of this investigation could be initiated in FY93. However, even if



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unconstrained funding were available, for practical reasons only a portion of the scheduled work could be executed in FY93 because of the delayed starting date.

- 2) Unexpected long turnaround times are being experienced for samples collected in FY92 (6-8 months for radiological contaminants, compared to the expected two months). The delay in receiving analyses makes it impossible to completely report results for all scheduled FY92 field work in Tech Memo 1, due June 14, 1993.

Given the situation described above, several alternatives have been considered for technical reports required for the TA-21 RFI:

- 1) delay scheduled Tech Memos until essentially all technical data for all scheduled investigations in the reports have been received, validated, and assessed;
- 2) submit curtailed Tech Memos on available results on scheduled report dates and report subsequent results in later reports; or
- 3) report interim data in quarterly technical progress reports and submit Tech Memos only when technical data are available to permit essentially complete reporting of specific investigations originally meant to be addressed by the Tech Memos.

We prefer Option 3 because it minimizes the burden (to EPA, DOE, and the Laboratory) of preparing, submitting, and reviewing technically incomplete Tech Memos of limited utility while showing good faith in timely reporting of RFI results. Based on our interpretation of informal discussion with EPA Region (R.) 6 personnel, this option also is likely to be the preference of EPA.

The enclosed draft letter is intended to inform EPA R. 6 of the circumstances which have led to the schedule and reporting difficulties currently faced by the TA-21 RFI. In addition, we seek formal concurrence with our preferred corrective action. These subjects have been discussed with R. 6 personnel on several occasions (as recently as February 1993).

The last issue is minor, in that we would like approval to refer to Technical Memoranda as Phase Reports in future correspondence. The Laboratory's Environmental Restoration Program has changed the title of these technical reports in all communication with the EPA, except for the TA-21 OU. These technical reports are specified as Technical Memoranda in the EPA-approved work plan for the TA-21 OU, and, therefore, requires their approval to officially change the title. The title change does not affect the content of these documents in any way.

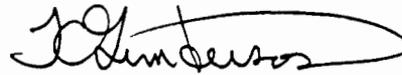
Mr. Joseph Vozella
EM-DO:93-344

Bureau Files
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If you have any questions, please contact me or have your staff contact Robert Vocke of my staff at 667-0808.

Sincerely,



Thomas Gunderson
Division Leader
Environmental Management Division

TG/wvm

- Enclosures: 1) TA-21 OU RFI Work Plan Addendum Table 3.1-1. (Summary of Technical Reports for the TA-21 OU RFI)
2) Draft Letter to William Honker

Cy: (w/enclosures)

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- C. Mack, LC-GL, MS A187
- G. Eller, INC-9, MS J519
- T. Glatzmaier, ESS-5/EM-13, MS M992
- EM-13 File, (EM-13:93-301), MS M992
- RPF, MS M707
- CRM-4, MS A150

