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February 5, 1996

Court Fesmire
Department of Energy
Los Alamos Area Office
MS-A316
Los Alamos, NM 87545

Re: NMED, DOE OB concerns with LANL Demolition and Decontamination (D&D) activities involving potential contaminant's of concern (COC) releases to the environment.

Dear Mr. Fesmire:

Recent events concerning potential impacts to the environment during D&D operations lead AIP staff to believe that many subsurface utility lines and pipes have been incorrectly surveyed and identified at these sites. Additionally, at some D&D excavation sites, Best Management Practices (BMP's) such as hay bales, silt fencing, jute matting, etc., are not being used to control the erosion and movement of the soil. The most recent events are:

1. July 1995, approximately 130,000 gallons of potable water was released into an excavation pit during the D&D of buildings 3 and 4 south, at TA-21, an area contaminated with enriched uranium, plutonium and americium. This release occurred when heavy machinery dug into an underground water line that had been incorrectly located. This event most likely caused radionuclides to be released into Los Alamos Canyon.
2. December 1995, D&D operations were halted at TA-35 by LANL ES&H staff due to a repeat violation of workers in an un-shored excavation pit. Additionally, it was brought to our attention that soil mounds excavated from the D&D site might contain potential radionuclides or COC's. AIP staff observed that these soil mounds have no safeguards in place to control COC transportation to the environment in the event of storm or snow melt events. Since it is not known if the soil is contaminated, we recommend that BMP's be implemented at this site in order to control the movement of the soil.



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Mr. Court Fesmire
February 5, 1996
Page 2

3. January 1996, during continued D&D operations at TA-21, a worker using a jackhammer encountered a subsurface high voltage cable, critically injuring himself .

The events described above warrant that a comprehensive survey be conducted utilizing the best scientific measures to accurately locate all underground utility infrastructure at D&D sites. Accurate location of these structures and proper training of workers is essential to the D&D process and con-comitantly health and safety of workers. We also recommend that BMP's be implemented at all D&D operations where potentially contaminated soil and rubble could leave the site and be transported to the environment. If you have any further questions regarding this matter please contact Harvey Decker at 672-0459.

Sincerely,



Stephen Yanicak
NMED, DOE OB/POC

cc: Steve Rae, Group Leader, ES&H-18, MS-K497
Neil Weber, Chief, NMED, DOE OB
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