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Date: August 2, 1996
 Refer to: EM/ER:96-422

Mr. Benito Garcia
 NMED-HRMB
 P.O. Box 26110
 Santa Fe, NM 87502

**SUBJECT: RESPONSE TO THE NOD FOR SAMPLING AND ANALYSIS
 PLAN FOR PRS 21-018(b)**

Dear Mr. Garcia:

Enclosed are two copies of the Los Alamos National Laboratory's response to the New Mexico Environment Department's Notice of Deficiency (NOD) concerning the Sampling and Analysis Plan for Potential Release Site 21-018(b). A certification form signed by the appropriate officials is also enclosed. The enclosed response repeats each comment from the NOD for convenience in reviewing.

Please contact Garry Allen at (505) 667-3394 or Bonnie Koch at (505) 665-7202, if you have any questions regarding the response to the NOD.

Sincerely,


 Jorg Jansen, Program Manager
 LANL/ER Project

Sincerely,


 for Theodore J. Taylor, Program Manager
 DOE/LAO

JJ/TT/bp

Enclosures: Response to NOD for Sampling and Analysis Plan for PRS 21-018(b).
 Certification

TU



Cy (w/ encs.):

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N. Naraine, DOE-HQ, EM-453
D. Neleigh, EPA, R.6, 6PD-N (2 copies)
T. Taylor, LAAO, MS A316
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**RESPONSE TO NOTICE OF DEFICIENCY FOR
SAMPLING AND ANALYSIS PLAN FOR PRS 21-018(b)
(FORMER OPERABLE UNIT 1106)**

COMMENT 1

Data Quality Objectives, p. 4: The last sentence of bullet 2 should be revised as follows: "Because the purpose of this investigation is to confirm the absence of contamination, contamination is defined as a release of hazardous or radioactive constituents to the environment at levels that exceed SAL or background."

RESPONSE

Los Alamos National Laboratory (LANL) concurs with the intent of Comment 1, and proposes the following revision: "Because the goal of this plan is to confirm the absence of contamination, contamination is defined as a release of hazardous or radioactive constituents to the environment at levels that exceed the upper threshold limit of background."

LANL also proposes that the last paragraph of Section 2.0 be revised as follows: "Sampling activities proposed in this sampling and analysis plan are intended to confirm the presence or absence of contamination (as defined in Section 3.0) at the site of the former TA-21 laundry. If contamination is found, further action will be undertaken to support a final recommendation for this SWMU."

COMMENT 2

Table 1, p. 10-11: How will it be determined when the possible samples will be analyzed? This also applies to Section 4.2.3 Number of Samples. When will samples at the 2-4 foot and 4-6 foot interval be analyzed?

RESPONSE

The outline for the sampling and analysis plan has sections for describing the locations where samples will be collected (Section 4.2.1), the actual collection of samples (Section 4.2.2), and the number of samples that will be collected (Section 4.2.3). The confusion with Section 4.2.3, Number of Samples, probably results from the separation in these three sections of the total number of samples collected. LANL proposes to replace the existing paragraph in Section 4.2.3 with the following:

"Twelve locations will be sampled. At least one sample will be collected from each location at the 0- to 2-ft interval, resulting in a minimum of 12 samples. The criterion for determining when to collect additional samples is the depth of the interface between the soil and the underlying tuff. Additional samples will be collected at each location from 2-ft intervals (2-4 ft, 4-6 ft, etc.) as necessary to reach the interface of the existing soil and the tuff, as described in Section 4.2.2. Table 1 indicates that a total of 36 samples may be collected based on the assumption that three 2-ft intervals are sampled at each of the 12 locations. All samples collected will be submitted for analysis as soon as practical and analyzed as described in Section 4.3."

COMMENT 3

LANL should provide a schedule for the field work and submittal of a report for this unit.

RESPONSE

LANL concurs with this comment. However, Potential Release Site (PRS) 21-018(b) did not exist in the Fiscal Year 1996 (FY96) Baseline Schedule. The FY97 Baseline Schedule, which will include PRS 21-018(b), is currently being developed. When the FY97 Baseline Schedule is approved, which is anticipated to occur early FY97, a schedule detailing the fieldwork and report preparation for PRS 21-018(b) will be forwarded.