

TA21

# Los Alamos

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**HAND DELIVERED**

**RE: CORRECTION TO NOTIFICATION LETTER OF MARCH 6, 1997  
REGARDING MANAGEMENT OF MATERIALS AT TA-21**

Dear Mr. Persampieri:

On March 6, 1997 representatives of the University of California (UC) and the United States Department of Energy (US DOE) sent a letter to Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau, that followed up on an oral notification, provided on February 12, 1997, regarding Los Alamos National Laboratory's (LANL) management of materials associated with the preparation of a major portion of the DP West facility for subsequent decontamination and decommissioning activities. This letter, from G. Thomas Todd, Area Manager, U.S. Department of Energy, and Dennis Erickson, ESH Division Director, Los Alamos National Laboratory (LANL), and dated March 6, 1997 (Letter) had two attachments, a Chronological Sequence of Events (Attachment 1- referred to as "Chronology") and a draft five page set of spreadsheets which represented a working inventory of gas cylinders located at the DP West facility (Attachment 2).

The primary purpose of the oral notification and Letter were to provide NMED with information, as we understood the circumstances at that time, concerning the then current management practices and issues associated with the gas cylinders and other materials at DP West of Technical Area 21. In the course of providing that information, a brief chronology was put together (Attachment 1) that focused on the issues related to the care of the gas cylinders from August of 1996 through February of 1997. The Letter itself provides a thumbnail sketch in a three paragraph summary of past events over a four year period related to the handling of the gas cylinders in the context of preparing for the decontamination and decommissioning operation.

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Recently, LANL has investigated in some detail these past events, as well as other background information regarding the handling of the gas cylinders as part of an effort to address a number of issues raised by Compliance Order HRM-98-02 (CO). As a result of this investigation, we believe that we now possess more accurate information regarding that background, than was available at the time of the oral and written notifications. While this information may be subject to further qualification and nuance as we pursue further understanding of various issues, we believe it appropriate at this time to follow up my oral notification made to your office by voice mail on July 11, 1998, and notify NMED that the Letter and Attachment 1 appear to contain at least three items requiring qualification, if not correction.

First, the phrases "abandoned gas cylinders" or "abandoned materials" appear in a number of places in the Letter and Chronology. This needs correction as the product gas cylinders were handled as product and placed in a staging area in Building 5S awaiting further use and recycle. Also, any waste materials that were RCRA/HWA hazardous wastes that were retrieved were never left alone or deserted by LANL, but were managed as waste and shipped to permitted or interim status treatment storage, and/or disposal facilities. Second, the Letter can be interpreted as saying that the gas cylinders may have been placed in satellite accumulation areas in Buildings 3 and 4 and from there into Building 5 South. This is incorrect as none of the gas cylinders referred to in the Chronology or in the spreadsheets (Attachment 2) were placed into a satellite area in Buildings 3 and 4, nor were any gas cylinders moved from a previous satellite area into the satellite area of Building 5 South. Third, the first full paragraph on page 2 of the Letter suggests that a sudden discovery may have occurred about the nature of the contents of the gas cylinders for the first time in August, 1996. This again is incorrect as the contents of most cylinders was known. However, concerns were raised in August of 1996 by the facility management team about whether waste management personnel in charge of the SAA in which waste gas cylinders were being managed should be handling the cylinders without full knowledge and training on how to handle cylinders, the contents of some of which were known to be dangerous, if individuals were to be exposed to them. The LANL Hazardous Materials Team was asked to review the contents of the cylinders, segregate them according to DOT classifications, and to check for leakage. None were found to be leaking.

The Answer to be filed to Compliance Order 98-02, will reflect this more recently acquired understanding of the background to the handling of the cylinders. Since the handling of the gas cylinders is now the subject of an administrative compliance order, we thought it prudent to provide this notice to NMED through legal channels and so this notification of correction is

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addressed to you. If you have questions regarding this matter, or wish to discuss it further,  
please do not hesitate to contact me at (505) 665-2286.

Sincerely,

*Joseph B. Rochelle*  
*By Josna Foster*

Joseph B. Rochelle

JBR/jf

Cys: Hortense Haynes, LAAO, A316  
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File (2)