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Date: March 21, 2006
Refer to: ER2006-0250

Mr. James Bearzi
NMED – Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

SUBJECT: REQUEST FOR CHANGE TO HIGH EXPLOSIVES FIELD SCREENING REQUIREMENTS: "APPROVAL WITH MODIFICATIONS INVESTIGATION WORK PLAN FOR MATERIAL DISPOSAL AREA A AT TECHNICAL AREA 21, EPA ID #NM0890010505, HWB-LANL-05-002."



Dear Mr. Bearzi:

The purpose of this letter is to request a change to the method of field screening for High Explosives (HE) at Solid Waste Management Unit (SWMU) 21-014, Material Disposal Area (MDA) A, from that identified in the approved investigation work plan: "Approval with Modifications Investigation Work Plan (IWP) for Material Disposal Area A at Technical Area 21, EPA ID #NM0890010505, HWB-LANL-05-002 dated July 26, 2005." The change is requested based on unavailability of the required test kits.

Section 4.10.1 of the IWP requires field screening of borehole materials for HE using Strategic Diagnostics, Inc. D-Tech immunoassay test kits. The sole distributor of these kits has informed our subcontractor that the kits are currently unavailable due to manufacturer materials availability issues. The distributor is currently not accepting orders for this kit and likely will not accept orders for another six weeks. The distributor was also unwilling to commit to a delivery date because of the uncertainty of manufacturer delivery estimates. We cannot conduct field screening of the borehole materials as planned without the test kits and therefore cannot begin field work until they are available.

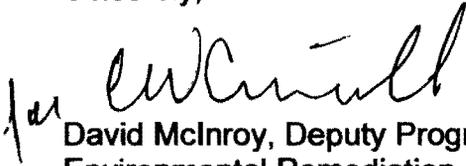
It is not possible to maintain the Consent Order schedule for delivery of the Investigation Report by November 9, 2006, unless an alternate approach to HE screening is approved. We therefore propose that the field screening for HE be replaced by laboratory test method meeting the Environmental Protection Agency (EPA) 8330 test method. If the laboratory test method results in a positive detection for HE, we would evaluate the validity of the results, and if found valid, perform fixed laboratory testing for HE as described in the approved work plan.

Drilling activities are scheduled to begin April 4, 2006. We therefore request immediate approval of the proposed procedural change in order not to impact the Investigation Report due date. Your prompt attention to this matter is greatly appreciated.



If you have any questions, please contact Ron Rager at (505) 665-4065 (rrager@lanl.gov) or Woody Woodworth at (505) 665-5820 (lwoodworth@deoal.gov).

Sincerely,



David McInroy, Deputy Program Director
Environmental Remediation & Surveillance
Los Alamos National Laboratory

Sincerely,



David Gregory, Federal Project Director
Department of Energy
Los Alamos Site Office

RR/jk

Cy:

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ENV-ECR File, MS M992
RPF, MS M707
IM-9, MS A150