

TA21



Environmental Programs
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87545
(505) 606-2337/FAX (505) 665-1812



National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-4255/FAX (505) 606-2132

Date: **APR 27 2010**
Refer To: EP2010-0204

James Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

**Subject: Request for Extension of Date for Submittal of Material Disposal Area T
Remedy Completion Report**

Dear Mr. Bearzi:

This letter requests an extension from the December 19, 2010, date for the Material Disposal Area (MDA) T remedy completion report to a new date of August 20, 2015. This request is submitted in response to the March 24, 2010, email from Kathryn Roberts of the New Mexico Environment Department (NMED). As Ms. Roberts stated, the MDA T investigation is ongoing in accordance with separate direction from NMED, and the next action is for Los Alamos National Laboratory (the Laboratory) to submit the Technical Area 21 (TA-21) groundwater network evaluation report to NMED by July 2, 2010. The groundwater network evaluation will probably result in a subsequent work plan for installing and monitoring new groundwater wells at several locations at TA-21, including MDA T.

A proposed schedule for major milestones leading to the remedy completion report is summarized below. The schedule incorporates additional investigation work that has been performed at NMED's request and the installation of additional monitoring wells the Laboratory anticipates will result from recommendations in the TA-21 groundwater network evaluation report:

- Groundwater Network Evaluation Report July 2, 2010
- Corrective Measures Evaluation Report June 12, 2013
- Corrective Measures Implementation Plan June 27, 2014
- Remedy Completion Report August 26, 2015

Attached to this letter are a planning schedule and the rationale for each step in the schedule culminating in the preparation of the MDA T remedy completion report, including the installation of the new wells and the collection of four quarters of groundwater data; the compilation and evaluation of contaminant transport, risks, and remedial alternatives; and submittal of the corrective measures evaluation and implementation reports.



We welcome the opportunity to discuss this schedule, its inherent assumptions, and its implications with you at your convenience. If you have any questions regarding this request, please contact Kate Lynnes at (505) 665-3019 (klynnes@lanl.gov), Paul Huber at (505) 412-7673 (phuber@lanl.gov), or Ed Worth at (505) 665-0398 (eworth@doeal.gov).

Sincerely,



Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,



David R. Gregory, Project Director
Environmental Operations
Los Alamos Site Office

MG/DG/PH/BW:sm

Attachments: Description of Basis for Extension and Planning Schedule

Cy: Laurie King, EPA Region 6, Dallas, TX
Tom Skibitski, NMED-OB, Santa Fe, NM
Steve Yanicak, NMED-DOE-OB, MS M894
Edwin Worth, DOE-LASO, MS A316
Annette Russell, DOE-LASO (date-stamped letter emailed)
Bruce Wedgeworth, EP-TA-21, MS C349
Paul Huber, EP-TA-21 MS C349
Victoria George, ADEP MS M991
Kathryn Lynnes, ADEP MS M991
Michael J. Graham, ADEP, MS M991
Kristine Smeltz, EP-WES, MS M992
RPF, MS M707
IRM-RMMSO, MS A150 (date-stamped letter emailed)

DESCRIPTION OF BASIS FOR EXTENSION

General: The assumptions behind the key points in the schedule are summarized below. It is important to note that the only "date certain" in the schedule is the submittal date for the Technical Area 21 (TA-21) groundwater network evaluation report. The remaining projected dates are all dependent on a number of factors including, but not limited to, New Mexico Environment Department (NMED) review times, rig scheduling, and site conditions. The interim milestones, such as well installation dates and monitoring-well completion report submittals, are particularly fluid. The primary objective of this schedule is to set a reasonably achievable date for the submittal of the remedy completion report that will allow for the collection of the statistically defensible groundwater data necessary to support a remedy evaluation.

Groundwater Network Evaluation Report: The groundwater network evaluation, which will determine the need for and location of monitoring wells to assess the groundwater conditions surrounding Material Disposal Area (MDA) T and the vadose zone and groundwater conditions potentially impacted by all known sources at TA 21, will be submitted by July 2, 2010, per NMED's letter dated February 10, 2010. The proposed schedule allows 30 days for NMED to review and approve the groundwater network evaluation report.

Monitoring Well Drilling Work Plans (WPs): The estimated submittal date for the MDA T monitoring well investigation work plan is September 30, 2010. Two wells were assumed for the purposes of developing this schedule and are thought to be sufficient to allow Los Alamos National Laboratory (LANL) to evaluate groundwater conditions in the area of MDA T but may vary depending on the final approval of the network evaluation report. Monitoring well drilling WPs, in the format used for other monitoring wells installed at LANL, will be prepared and submitted for NMED. A 30-day approval period is anticipated.

Groundwater (GW) Periodic Monitoring Reports (PMRs): It was assumed for the purposes of developing this schedule that sufficient data can be collected in two quarters to allow the evaluation of corrective measures for MDA T to begin. Because a minimum of four quarters of monitoring is required to statistically support the investigation results, two subsequent quarters of data will be integrated into the corrective measures evaluation (CME) as it progresses. Approval to start the CME process will be included in the second quarter GW PMR. Based on the anticipated well completion, the second quarter GW PMR is anticipated around April 15, 2012. Only the second and fourth quarter groundwater PMRs are shown on the planning schedule.

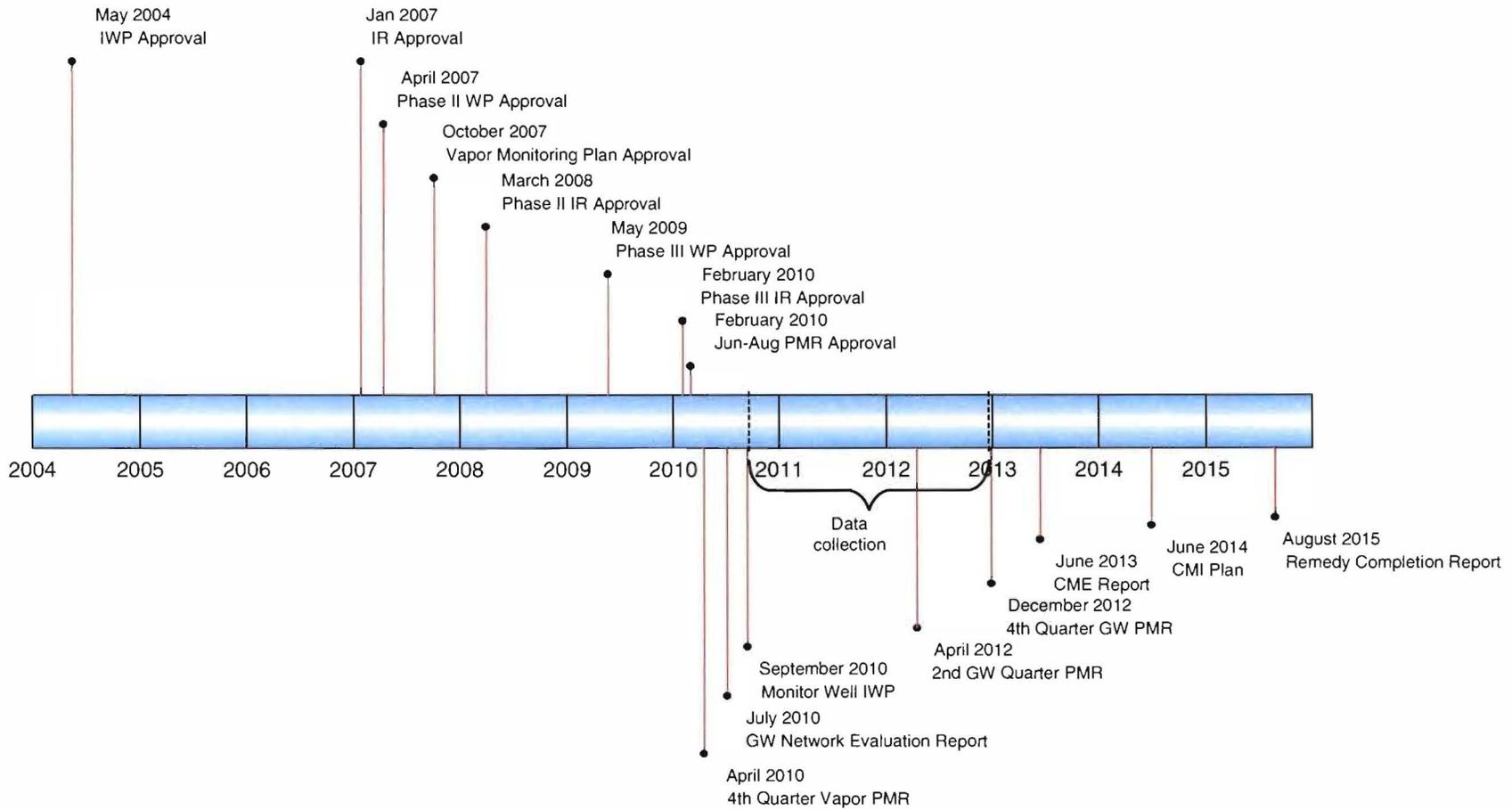
CME Report: MDA T contains a significant radiological inventory, second only to MDA G at LANL. Because of the significant cost and exposure concerns related to an MDA T remedy, it was assumed for the purposes of developing this schedule that the corrective measures process of the Compliance Order on Consent (the Consent Order) will be implemented. Considerable effort will be required, including a risk assessment of each alternative that evaluates the short-term and long-term risk for implementation. The CME process will allow for the objective consideration of potential remedies. A CME will begin upon availability of sufficient data to allow evaluation of groundwater conditions. Four quarters of groundwater data must be collected and evaluated before the CME process is complete. The CME report, which will support selection of a remedy, will be submitted to NMED before June 12, 2013, to allow NMED to proceed with the statement of basis, estimated to take 180 days, based on that established for MDA G.

Corrective Measures Implementation (CMI) Plan: Following a remedy decision by NMED, it was assumed for the purposes of developing this schedule that 102 days will be required to prepare the implementation plan for the selected remedy. This will allow sufficient time to prepare implementation designs and specifications and to secure needed safety basis authorization from the U.S. Department of Energy. For the purpose of this schedule, capping with enhancements was assumed to represent a "reasonable" duration project. The CMI plan is anticipated to be submitted to NMED for approval by June 27, 2014.

Remedy Completion Report: Following selection of a subcontractor and implementation of the remedy, a remedy completion report will be submitted to NMED as required by the Consent Order, on August 26, 2015. For the purposes of developing this schedule 429 days were anticipated for implementation of the remedy and another 127 days to prepare the report.

Planning Schedule

Thursday, April 22, 2010



Milestones Achieved and Milestones Required