



Department of Energy
Albuquerque Operations
Los Alamos Area Office
Los Alamos, New Mexico 87544

JUN 4 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Gallagher
U. S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Gallagher:

The purpose of this letter is to inform you of the mechanism we wish to implement to ensure that our Decontamination and Decommissioning (D&D) activities, which have been on-going at Los Alamos National Laboratory (LANL) for some time, comply with Hazardous and Solid Waste Amendments (HSWA). In particular, we are sensitive to the need for integrating our existing D&D Program with the corrective action provisions of our HSWA permit, which we intend to satisfy using our Environmental Restoration (ER) Program. We are also submitting work plans for your approval for one Institutional Interim Action of this type.

As it exists now, the LANL D&D Program is an outgrowth of the Surplus Facilities Management Program (SFMP), which was established in 1978 by the Department of Energy (DOE) under the authority of the Atomic Energy Act of 1954, as amended. The SFMP was established to provide safe caretaking (surveillance and maintenance) and disposition (decommissioning) of retired, DOE-owned or DOE-sponsored nuclear facilities that were used to support energy research and the development of nuclear power.

In 1982, as part of the reorganization of DOE Headquarters (DOE-HQ), the responsibility for managing decommissioning projects was divided between the Assistant Secretary for Nuclear Energy (NE) and the Assistant Secretary for Defense Programs (DP). The SFMP was retained in the NE with jurisdiction over activities at those surplus facilities related to the development of civilian nuclear power and energy technology. Remedial activities related to existing facilities that were primarily used for defense-related purposes were put under the jurisdiction of DP, and are called D&D activities.

Since LANL is primarily a Defense Programs facility, the disposition of retired existing facilities at LANL is usually called D&D. The fundamental responsibility of LANL D&D managers is to protect public health and the environment from potentially harmful radioactive contamination contained within surplus facilities. To that end, D&D managers are charged with planning and conducting the maintenance, surveillance, and ultimate decommissioning of such facilities safely, cost-effectively, and expeditiously.

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Mr. William Gallagher

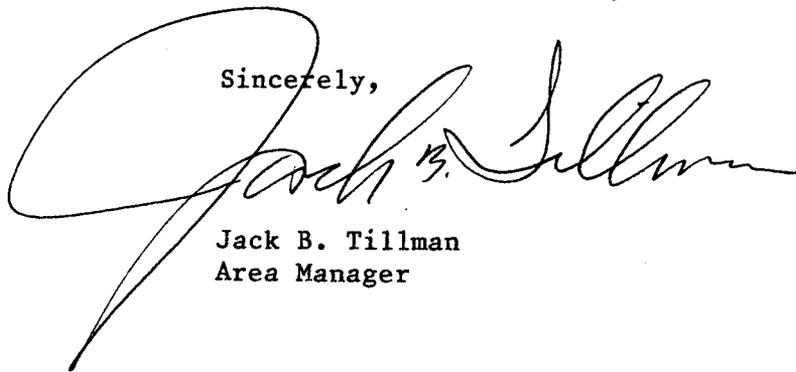
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We have recently identified a planned D&D activity within an existing Solid Waste Management Unit (SWMU). Therefore, there is a need to develop a strategy that integrates both programs and ensures regulatory compliance. DOE Albuquerque Operations has also recognized this need, and intends to rearrange their work breakdown structure to show D&D as part of the ER Program instead of as a separate entity as it has been historically. This will facilitate the kind of interaction needed to ensure regulatory compliance.

At LANL, D&D activities performed inside of buildings still will be managed in a separate program, but all D&D activities performed outdoors will be coordinated by our ER Program Office. We feel that such ER Program managed D&D projects should be considered Institutional Interim Actions governed by our HSWA permit and driven by institutional need. Project leaders within the LANL ER Program Office will see that the strategy depicted in the decision flowchart (Attachment 1) is implemented. We submit this flowchart for your review and approval.

Please find enclosed a plan for implementation of this strategy at the Los Alamos Power Reactor Experiment No. 2 (LAPRE II) facility, the case mentioned above. We are submitting this package for your approval since it constitutes an Institutional Interim Action at SWMU 35-002. If you have any questions regarding the approach we intend to use to integrate D&D with our ER Program, or if you have any specific concerns related to the LAPRE II facility, please contact Dr. Paul Schumann of my staff at FTS 843-5288.

Sincerely,



Jack B. Tillman
Area Manager

LESH:2PS-259-5

Enclosure

cc:

Diane Morton, DOE-AL
Rich Sena, DOE-AL
John Puckett, HSE-DO, MS-K490