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

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March 1, 1996



Stephen Yanicak  
State of New Mexico  
Environmental Department  
DOE Oversight Bureau  
P. O. Box 1663, MS-J933  
Los Alamos, New Mexico 87545

Re: NMED, DOE OB concerns with LANL Demolition and Decontamination (D&D) activities involving potential contaminants of concern (COC) releases to the environment.

Dear Mr. Yanicak:

This letter is in response to the letter you wrote to Mr. Court Fesmire, DOE/LAAO, on February 5, 1996, subject as above.

In your letter you expressed two concerns. The first concern was that recent events had occurred during D&D operations that lead AIP staff to believe that many subsurface utility lines and pipes have been incorrectly surveyed and identified, and you suggested that a comprehensive survey (using scientific methods) be conducted to accurately locate all underground utilities at D&D sites, since accurate location of these structures and proper training of workers is essential to the D&D process and the health and safety of workers. The second concern was that Best Management Practices (BMPs) are not being used to control erosion and movement of soil, for which you recommended that BMPs be implemented at all D&D sites where potentially contaminated soil and rubble could leave the site and be transported to the environment. You also provided three examples of recent events that you believe supported your environmental concerns, and you also focused on health and safety issues.

After review of your letter and an in depth examination of the events that you cited, it appears that your recommendations seem to be focusing on health and safety, and project operations, areas that are not the responsibilities of your organization. I appreciate your concerns, and I encourage you and your staff to verbally address imminent health and

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safety issues with the on-site project managers if you witness activities that are an immediate threat to the health and safety of the environment, workers or the public. However, I believe that your written observations and recommendations should focus on environmental protection concerns.

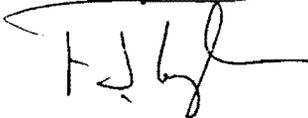
In response to event example 1, you cited that radionuclides most likely were released into Los Alamos Canyon. Based on analytical analysis of water samples taken from the trenches, water drain in building 21-150, mechanical room in building 21-116, electrical room in building 21-149, and the outfall, no gross alpha or gross beta activity was detected. Detailed sample information can be provided to you upon request.

In response to event example 2, possible contaminated soil erosion, the soil that is removed from the trenches to allow access to the process exhaust is field screened for radioactivity above back ground, the mounds of soil are individually monitored for alpha, beta, and gamma contamination, and have not had any elevated activity greater than background. Results of these surveys are documented on appropriate forms and a log entry is made. Documentation is located at the TA-35 D&D site. The Decommissioning project also has an approved Storm Water Pollution Prevention Plan, effort has been made to ensure that the requirements of the plan are being followed by the D&D contractor, and that BMPs are followed.

In response to event example 3, this event was not a D&D activity, but due to the severity of the injury, LANL has taken appropriate actions to ensure worker health and safety during all excavation activities.

If you have any questions concerning this letter, please contact me at (505) 665-7203.

Sincerely,



Theodore J. Taylor  
ER Program Manager  
Los Alamos Area Office

cc  
D. Griswold, ERD, AL, MS A906  
N. Naraine, EM-452, HQ  
J. White, ESH-19, UC-LANL

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