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December 6, 2011

DCN: NMED-2011-36

Mr. David Cobrain  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Dr. East  
Building One  
Santa Fe, NM 87505



RE: Response to the Notice of Disapproval for the Bandelier Tuff Unit 4 Background Study Report, Los Alamos National Laboratory, dated October 11, 2011.

Dear Mr. Cobrain:

This letter addresses the evaluation of Los Alamos National Laboratory's (LANL) response to the Notice of Disapproval (NOD) for the Bandelier Tuff Unit 4 Background Study Report. As noted in an email dated November 30, 2011, Ms. Neelam Dhawan requested a review of the NOD response and whether the background study report should be approved.

All of the responses were adequate as provided, although some additional clarifications for the work plan for the proposed additional investigation may be warranted.

LANL plans to collect 10 samples at TA-49 (as discussed in their 2011 Phase II Work Plan for TA-49 Sites inside the Nuclear Environmental Site Boundary) at the sample locations where inorganic detections were elevated and determined to be naturally occurring, and observe if there is evidence of weathering. It is suggested that LANL include details in the Work Plan for this event how they propose to measure varying stages and degrees of weathering (as this can be very subjective). LANL should also provide justification that results from a sample size of 10 would be sufficient to support their conclusion. Further the work plan should include information on how LANL plans to use their results to either accept or reject their hypothesis that weathering is the cause of elevated detections of inorganics in Qbt 4 (such as the TA-49 sites), and if they plan on using soil BVs instead of Qbt BVs.

If you or any of your staff have questions, please contact me at (801) 451-2864 or via email at paigewalton@msn.com.

Thank you,

Paige Walton  
AQS Senior Scientist and Program Manager

cc: Neelam Dhawan, NMED (electronic)  
Joel Workman, AQS (electronic)  
Sunny McBride, AQS (electronic)

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