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March 18, 1994

OU 1144

Mr. Jerry Bellows, Manager
 Los Alamos Area Office
 528 35th Street
 Los Alamos, NM 87544



Dear Mr. Bellows:

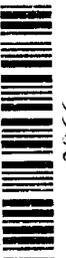
Re: LANL TRU-waste burial units

As a result of the reviews of the RCRA Facility Investigation Workplans (RFIW) for Operable Units (1144) and (1148), my Agreement in Principle staff in the Hazardous and Radioactive Materials Bureau have informed me that these workplans raise a potentially serious concern regarding long-term management of buried transuranic waste (BTW). The RFIW for Operable Unit 1144 states:

"100 years after the site closes, no intruder (member of the public encroaching on the site) should receive a continuous dose of greater than 100 mrem/yr, and the disposal site should be designed such that an intruder will never receive an acute (accidental, one-time) exposure greater than 500 mrem/yr. DOE Order 5820.2A mandates a "performance assessment" to prove that the radioactive waste management unit design currently in use can achieve these two performance objectives." (Page 1-20)

Similar statements are made in the RFIW for Operable Unit 1148 (e.g., Executive Summary, p.vi).

DOE Order 5820.2A refers to document DOE JIO-025 for long-term management of BTW. The referenced document states that among the performance objectives for long-term burial of these wastes is "To ensure that BTW wastes are safely isolated from the biosphere." In order to meet this standard, the BTW disposal units in question should be shown capable of sequestering their contents over the period of time during which the contaminants remain hazardous. This demonstration should be made in a timely manner and as a part of the Corrective Measures Studies for all BTW sites within the environmental restoration program. In addition, it is unclear at this time as to whether the disposal units in question also contain RCRA-regulated mixed waste. It is likely that a TRU waste would also be a mixed waste due to the presence of heavy metals (e.g., lead or other RCRA wastes). If the determination is made that such is the case, the Hazardous and Radioactive Materials Bureau would become formally involved in decisions regarding the disposition of



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these units.

If you have any questions, please contact Dr. Bruce Swanton of my staff at 672-0447.

Sincerely,



Kathleen M. Sisneros, Director
Water and Waste Management Division

KMS/bas

cc: Benito J. Garcia, Chief, HRMB
Neil Weber, Chief, DOE Oversight Bureau
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