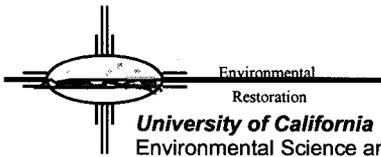


Hswa LANL 5/1144/49/49-001(a-g) [MDA AB]



University of California
Environmental Science and Waste Technology (E)
Environmental Restoration, MS M992
Los Alamos, New Mexico 87545
505-667-0808/FAX 505-665-4747



U.S. Department of Energy
Los Alamos Area Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
505-667-7203/FAX 505-665-4504



Date: August 12, 1999
Refer to: E/ER:99-194



Mr. John Kieling
NMED-HRMB
P.O. Box 26110
Santa Fe, NM 87502

SUBJECT: SELF REPORTING OF FAILURE TO COMPLY WITH RSI REQUEST TO CONDUCT MOISTURE MONITORING AT TA-49, PRSs 49-001(b, c, d, and g)

Dear Mr. Kieling:

Pursuant to discussions at the monthly meeting on June 16, 1999, between Los Alamos National Laboratory (LANL or the Laboratory) Environmental Restoration (ER) Project staff and New Mexico Environment Department Hazardous and Radioactive Materials Bureau (NMED-HRMB) staff, we are self reporting the failure to comply with the NMED-HRMB Request for Supplemental Information (RSI) request to conduct moisture monitoring at Technical Area (TA) 49, Potential Release Sites (PRSs) 49-001(b, c, d, and g), and report the monitoring results. A brief chronology of events leading to this situation is described below.

The LANL ER Project initially proposed monitoring for subsurface moisture conditions at PRSs 49-001(b, c, d, and g), otherwise known as Material Disposal Area (MDA) AB to help determine the effectiveness of the Best Management Practices (BMPs) implemented at the site during the summer of 1998. The moisture monitoring was described in section 6.0 of the "Stabilization Plan for Implementing Interim Measures and BMPs at PRSs 49-001(b, c, d, and g)" which was submitted to Dr. Robert S. Dinwiddie of NMED-HRMB. The plan proposed performing monitoring on a quarterly basis using neutron probes to determine moisture profiles in existing boreholes for two years. Any standing water present in a borehole was to be sampled and analyzed.

On August 11, 1998, NMED-HRMB issued an RSI on the stabilization plan. The RSI requested that LANL provide a sampling schedule for the moisture monitoring. LANL's RSI Response submitted to NMED-HRMB on September 10, 1998, included the requested Contingency Plan for reducing soil moisture content if an increase in moisture content under the temporary cover was observed during the monitoring. The Contingency Plan provided a schedule for monitoring surface soils and the soil/tuff interface on a monthly basis and monitoring the entire length of each borehole on a quarterly basis. On November 25, 1998, the Laboratory received a Notice of Deficiency (NOD) on the RSI Response for the stabilization plan. The NOD requested that the moisture monitoring results be reported to NMED-HRMB on a quarterly basis.

TL



August 12, 1999

LANL submitted the NOD Response to NMED-HRMB on December 21, 1998, stating that the moisture monitoring data would be reported quarterly to NMED-HRMB. The response also confirmed that analysis and interpretations of the monitoring data would be provided annually as stated in the Contingency Plan. On February 12, 1999, LANL received a letter from NMED-HRMB approving the NOD Response.

Since proposing and subsequently agreeing to conduct and report on the moisture monitoring at PRSs 49-001(b, c, d, and g) in December 1998, LANL has inadvertently neglected to collect the specified moisture monitoring data. We understand the importance of this data to help determine the effectiveness of the BMPs implemented at the site, and apologize for this oversight. However, review of the proposed monitoring plan has identified that existing boreholes may be inadequate to allow for the collection of the moisture monitoring data. Additionally, Fiscal Year 1999 (FY99) budget constraints have prevented LANL from installing any new boreholes at the site for the purpose of moisture monitoring.

LANL will collect one round of moisture data from those boreholes, where possible, before the end of FY99. These results will be reported to NMED-HRMB in early FY00.

To rectify our moisture monitoring problem we are contracting a consultant to review the existing monitoring plan and provide recommendations on its' adequacy and implementability. The objective of this review is to ascertain whether moisture monitoring can be used to adequately determine the performance of engineered covers, as well as to recommend the most efficient way to collect the moisture monitoring data. The deliverable of this study is a "white paper" which will be discussed with your staff prior to implementation. If the study does not clearly define our monitoring needs it is anticipated that the MDA Focus Area will initiate a pilot study in FY00 to investigate monitoring design for engineered covers.

The TA-49 monitoring work has been prioritized in the FY00 baseline for MDAs and will be implemented as early as possible in the Fiscal Year. The moisture monitoring data will be reported quarterly to NMED-HRMB, and analysis and interpretations of the monitoring data will be provided annually.

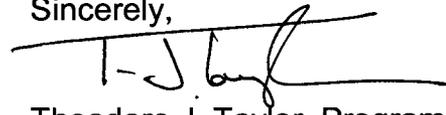
As discussed at the LANL NMED-HRMB ER monthly meeting on August 11, 1999, we are available to discuss our proposed approach with you and your staff and look forward to your continued input on this project. If you have any questions, please contact Deba Daymon at (505) 667-9021 or Joe Mose at (505) 667-5808

Sincerely,


Julie A. Canepa, Program Manager
LANL/ER

JC/TT/PB/dm

Sincerely,


Theodore J. Taylor, Program Manager
DOE/LAO

Mr. John Kieling
EM/ER:99-194

-3-

August 12, 1999

Cy: P. Bertino, E/ER, MS M992
M. Buksa, E/ET, MS M992
J. Canepa, E/ER, MS M992
D. Daymon, EES-13, MS M992
T. George, E/ER, MS M992
M. Kirsch, E/ER, MS M992
D. McInroy, E/ER, MS M992
J. Mose, LAAO, MS A316
T. Taylor, LAAO, MS A316
J. Kieling, NMED-HRMB
S. Yanicak, NMED-AIP, MS J993
E/ER File, MS M992
ER Catalog # 19990045
RPF, MS M707
Tracker RM 604, MS M992