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National Nuclear Security Administration
 Los Alamos Site Office, MS A316
 Environmental Restoration Program
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Date: **MAR 13 2012**
 Refer To: EP2012-0072

John Kieling, Acting Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303

Subject: Response to Direction to Modify for Request to Abandon Borehole 50-24817 at Material Disposal Area C, Solid Waste Management Unit 50-009

Dear Mr. Kieling:

On February 23, 2012 the U.S. Department of Energy (DOE) and Los Alamos National Security (LANS), LLC, requested approval from the New Mexico Environment Department (NMED) to plug and abandon borehole 50-24817 at Los Alamos National Laboratory (the Laboratory) Technical Area 50 (TA-50). This borehole is no longer needed to support environmental monitoring, and its protective surface casing was recently damaged by snow-removal equipment. On March 6, 2012, NMED issued the subject letter directing DOE and LANS to replace the surface casing on borehole 50-24817 rather than abandon the borehole. This direction was based on NMED's evaluation of the estimated costs associated with replacing the surface casing versus abandonment. The purpose of this letter is to respond to the subject direction to modify letter, received by DOE and LANS on March 6, 2012.

On March 7, 2012, staff from LANS and NMED held a telephone conference to discuss this direction. LANS staff explained that this borehole is no longer used for monitoring and that because of its location in a roadway, a typical surface casing design cannot be used. Regarding costs, LANS explained that because of vehicle traffic, a more robust surface completion is required. Repair of the borehole would require asphalt removal, excavation to support installation of a manhole, waste disposal costs for the excavated soil, and repaving the area surrounding the manhole. Based on consideration of these factors, LANS has concluded that abandonment of the borehole would be more cost-effective. NMED agreed that abandoning the borehole is appropriate and requested that LANS and DOE submit a response to the direction to modify letter documenting this decision.



If you have any questions, please contact Stephani Swickley at (505) 606-1628 (sfuller@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@nnsa.doe.gov).

Sincerely,


Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,


George J. Rael, Assistant Manager
Environmental Projects Office
Los Alamos Site Office

MG/GR/DM/SS:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Neil Weber, San Ildefonso Pueblo
Joe Chavarria, Santa Clara Pueblo
Steve Yanicak, NMED-DOE-OB, MS M894
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
Cheryl Rodriguez, DOE-LASO, MS A316 (date-stamped letter emailed)
Stephani Swickley, EP-CAP, MS M992 (date-stamped letter emailed)
Dave McInroy, EP-CAP, MS M992 (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991 (date-stamped letter emailed)
William Alexander, EP-BPS, MS M992 (date-stamped letter emailed)
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