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Cobrain, Dave, NMENV

From: Rhodes, David [David.Rhodes@nnsa.doe.gov]
Sent: Tuesday, March 27, 2012 11:05 AM
To: Cobrain, Dave, NMENV
Cc: George, Victoria A
Subject: Borehole 50-24817



Dave,

We appreciate NMED's agreement (via email) with the abandoning of borehole 50-24817. The contractor is currently on site and began the plug and abandoning process yesterday. The site visit with Michael Dale on Wednesday March 21st was very productive, given that NMED had not had the opportunity to see the current condition of the borehole. I think everyone now has a better understanding of why the borehole required abandonment.

In order to close the Administrative Record on this subject, LANS will be sending a response to your Direction to Modify letter, dated March 19, 2012. We wanted to take this opportunity to give you some preliminary information with regard to the response letter.

In NMED's letter of March 6, 2012, you raised the issue of budget limitations and concluded that it would be "more cost effective to replace the surface casing . . . rather than to abandon the boring". In follow-on correspondence and discussions – we now understand that NMED is seeking detailed cost comparison information on the P&A approach and the replacement of surface casing.

This request for specific cost information has been discussed by senior management for LANS and DOE. We understand your desire to have information on the specific scope elements that provide the basis for the comparison that you have requested. We will provide the specifics on the scope to support abandonment of the borehole. However, providing specific cost information is not appropriate. The NMED assertion that installing surface casing is less expensive than abandoning the borehole is correct if no long-term costs for maintenance are considered in the estimate. However, DOE and LANS must evaluate life-cycle costs when comparing alternatives to represent the true cost to DOE. The life-cycle cost comparison indicates that replacing the surface casing and maintaining a borehole that is no longer used is approximately 1.5 times more expensive than abandoning the borehole.

Finally, the original *Request to Abandon Borehole 50-24817 at Material Disposal Area C*, dated February 23, 2012 made no mention of cost being a reason for abandonment of the borehole. The Laboratory stated that because the borehole was no longer used for monitoring and because it had been damaged by snow removal equipment we would rather abandon it than repair the surface casing. This method is a permanent, more protective solution because it will seal a potential preferential pathway to groundwater. Additionally, the borehole is being abandoned in accordance with the methods outlined in Section X.D of the Consent Order.

We appreciate you working with us on this. Please don't hesitate to contact me should you have any questions.

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