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GROUND WATER
OCT 15 2018
BUREAU

Ms. Michelle Hunter, Chief
Ground Water Quality Bureau
New Mexico Environment Department
Harold Runnels Building, Room N2261
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, NM 87502

Dear Ms. Hunter:

Subject: Discharge Plan DP-1132, Condition No. 13, Maintenance and Repair

On August 29, 2018, the New Mexico Environment Department (NMED) issued Discharge Permit DP-1132 to the U.S. Department of Energy and Los Alamos National Security, LLC (DOE/LANS) for discharges of treated effluent from the TA-50 Radioactive Liquid Waste Treatment Facility (RLWTF). Condition No. 13, Maintenance and Repair, requires DOE/LANS to maintain the function and structural integrity of the RLWTF at all times except during maintenance and repair. Maintenance and repair required at a unit that could lead to an unauthorized discharge to the environment or pose a threat to human health shall be corrected as soon as possible but no later than 30 days from the date of the observed malfunction. Condition No. 13 allows NMED to approve a longer period, for good cause.

Pursuant to Condition No. 13, DOE/LANS have identified seven secondary containment alarms—located in vaults and sumps—that are presently malfunctioning. Repair of these seven alarms will not be completed within 30 days from the date of observed malfunction. Table 1 below provides additional, detailed information on each alarm.



Table 1. List of RLWTF Vault and Sump Alarms Requiring Repair

Tag Name	Location	Alarm Type	Malfunction Type
PLC11 SM749	TA-03-029	RLWCS ¹ vault	Communication Failure
PLC11 SM776	TA-03-029	RLWCS vault	Communication Failure
PLC14 SM758	TA-03-130	RLWCS vault	Communication Failure
PLC2 INF 16 A11	TA-50-001	Containment sump	Communication Failure
PLC2 INF 16 A41	TA-50-001	Containment sump	Communication Failure
PLC2 INF 16 A51	TA-50-001	Containment sump	Communication Failure
PLC2 SMP 34B A1	TA-50-001	Containment sump	Communication Failure

¹Radioactive Liquid Waste Collection System

DOE/LANS estimate that the task of identifying the root cause for each of the malfunctioning alarms will take approximately 30 days. Once the root cause is determined then DOE/LANS will provide NMED with a schedule for completing the required repairs.

In the interim, until the alarms are fully functional, DOE/LANS commit to implement the following contingencies to ensure that no unauthorized discharge occurs to the environment.

Vault Alarms

- Weekly visual inspection of the vaults with the malfunctioning alarms.
- If liquid is identified during a weekly inspection then the liquid will be sampled to confirm that the source of the liquid is infiltrated ground or storm water and not radioactive liquid waste.

Sump Alarms

- Daily visual inspection of the sumps with the malfunctioning alarms.
- Functioning tank-level alarms that respond to rapid changes in tank volumes.

In closing, DOE/LANS has identified seven secondary containment alarms that require repair; the time period to complete said repairs will extend beyond the 30-day allowable window specified in DP-1132 Condition No. 13. DOE/LANS request 30 days to determine the root cause of the malfunctioning alarms. Once the root cause is identified then a schedule for completing the repairs will be submitted to NMED. DOE/LANS request NMED approval of the proposed plan.


Please contact Karen E. Armijo by telephone at (505) 665-7314 or by email at Karen.Armijo@nnsa.doe.gov, or Robert S. Beers by telephone at (505) 667-7969 or by email at bbeers@lanl.gov if you have questions regarding this report.

Sincerely,



Tania S. Van Valkenburg
Group Leader

Sincerely,



Karen E. Armijo
Permitting and Compliance Program Manager

Ms. Michelle Hunter
EPC-DO-18-365

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