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February 18, 1993

Ms. Diana Webb, LANL/AIP/POC
LAAO, 528 35th Street
Los Alamos, NM 87544

RE: Review of LANL's May 1992 RCRA Facility Investigation
(RFI) Work Plan for Operable Unit (OU) 1147

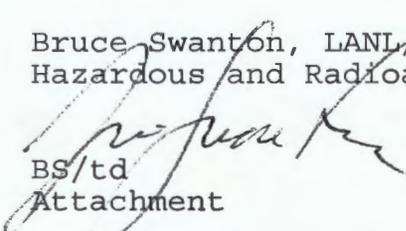
Dear Ms. Webb:

The enclosed attachment provides the Department of Energy (DOE) the Agreement-In-Principle's (AIP) technical comments for the above referenced RFI Work Plan as received by the Hazardous and Radioactive Materials Bureau's (HRMB) Technical Compliance Program.

Thank you for your prompt attention to this matter.

Sincerely,

Bruce Swanton, LANL/AIP/POC, Program Manager
Hazardous and Radioactive Materials Bureau


BS/td
Attachment

- cc: Benito Garcia, HRMB Bureau Chief
- Steve Alexander, HRMB
- Barbara Hoditscheck, HRMB
- Neil Weber, DOE Oversight Bureau Chief
- Teri Davis, DOE Oversight AIP/LANL Technical staff
- File LANL/RED/93
- Glen Saums, SWQB Program Manager
- Dennis McQuillan, GWPRB Program Manager
- Barbara Driscoll, EPA Region 6
- Cheryl Rofer, LANL OUPL



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MEMORANDUM

TO: Steve Alexander, Technical Compliance Program Manager

THROUGH: Bruce Swanton, POC
AIP DOE/LANL

FROM: Teri D. Davis
LANL/DOE Oversight Program

DATE: July 13, 1993

SUBJECT: **Comments on LANL's May 1992, Operable Unit 1147 RFI Work Plan**

The Hazardous and Radioactive Materials Bureau (HRMB) Agreement in Principle (AIP) personnel have completed their review of the Operable Unit (OU) 1147 RCRA Facility Investigation (RFI) Work Plan. The following memo is divided into two sections. Section 1 contains technical comments and recommendations on Hazardous and Solid Waste Amendment (HSWA) issues. The AIP program is submitting these HSWA-related comments and technical recommendations to the HRMB's RCRA Technical Compliance Program because of eventual New Mexico HSWA authorization. Section 2 contains comments concerning non-HSWA issues and is provided in this memo for the sake of completeness of the Work Plan review. These non-HSWA issues are those that are not specific to the RCRA regulations or to the facility's RCRA permit.

SECTION 1, HSWA-RELATED ISSUES

Specific Comments

1. [2.2.2.t.2-5] Where is the data for Hole #11? (See fig. 2-12 for location).
2. [2.3.2.2.2p4] Did the 1984 surface cover renovation interfere with the 1985 0-1 cm depth soil sampling event and potentially influence the results?
3. [5.1.2.t.5-1] The DWL coreholes are not indicated in this table.
4. [5.1.2.t.5-2] Samples from HDH-4 should be screened for organic vapors given the potential source term.
5. [5.1.2.1.2] Where are the sub-SWMUs (50-001(a)) located within building 50-1? An assessment of the Phase I field investigation for Aggregate 1 cannot be made without knowledge of 50-001(a) sub-SWMU locations in relation to proposed sampling locations.

6. [5.1.2.1.2] A lateral corehole should be drilled between HDH-1 and HDH-4. The traverse length should be sufficient to investigate Rm 70A to the eastern most clariflocculator in Rm 116. The additional corehole should investigate the following SWMU subunits for which there is no current sampling plan:
 - o drum tumbler operation (Rm 60A)
 - o evaporator storage tank (Rm 70A)
 - o rotary drum vacuum filter (Rm 116B)
 - o clariflocculator (Rm 116, eastern most)
 - o drum tumbler operation (Rm 60A)
7. [5.1.2.1.3] What is the proposed action if no contamination is found? Will the complete characterization of this unit be delayed until decontamination and decommissioning (D&D)?
8. [5.1.2.3.1p3] Where is line 56 located and will any of the proposed DWL coreholes investigate this remaining waste line?
9. [5.1.2.3.2] Where are the screening and analysis requirements for Phase I, subsurface investigations related to the DWL coreholes?
10. What will determine which 5 foot sample will initiate the count for samples to be submitted to the Lab? The initial Lab sample should be taken below the depth of the backfill material.
11. [5.1.2.3.3] Why is vertical extent not investigated?
12. [5.1.2.4.1] Phase 1 investigation of Tank Farm SWMU 50-002(a) and Tuff Tank Farm SWMU 50-003(c) includes corehole HDH-3 which is located to pass directly beneath building TA-50-2. Current specifications for HDH-3 indicate that the corehole would intersect various conduits and subsurface structures associated with this location. Cross-sections should be drafted showing the proposed corehole specifications in relation to existing substructures to avoid mishap.
13. [5.1.2.5.3] The objective of Phase 2 should be to define the nature, rate, and extent of contamination, not just to better characterize the distribution of contaminants.
14. [5.1.2.6.2.t.5-8] Will these samples be discrete or composites?

15. [5.1.2.6.3] Why is vertical extent not investigated?
16. [5.1.2.7.2] Will corehole SP-1 intersect the bottom of the 50-foot infiltration shaft? It is recommended that corehole SP-1 be drilled to intersect the bottom of the shaft.
17. [5.2.1.2.t.5-12] Field screening should include organic vapors.
18. [5.2.1.2.f.5-11] Will soil samples actually be taken in Pajarito Road as shown in this figure?
19. [5.2.2.2] An additional angled borehole should be drilled at Area C in order to characterize the northeast portion of Pit #5, an area of highest known radioactive activity, and to intersect the north-south trending fractures in the vicinity of TA-50.
20. [5.2.2.2] It is suggested that for all proposed angled (lateral) boreholes, the holes be completed as monitoring wells (soil-gas, moisture probe, etc.). This action should increase the efficiency of the RFI and provide valuable data which can be used to evaluate risk-based remedial selections for these material disposal area (MDA)s.
21. [5.2.2.3] The risk-based action level should be defined when using this term in the context it is being employed.

No Further Action (NFA) Units

[6.9.50-001(a)] SWMU subunit-100,000 gal. emergency holding tank (TA-50-90) has been recommended for NFA based on the premise that this facility had never been used. Contrary to the RFI Work Plan, it was discovered during an AIP site tour that the emergency tank has been used in the past to hold beta and gamma-contaminated liquids. Currently, the tank is being used to hold Omega West Reactor alpha-contaminated water. This particular statement indicates that NFA sites, which are based on this type of reasoning (archival data), should be more closely investigated.

SECTION 2, NON-HSWA ISSUES

General Comments

1. [5.1.2] Why are radiological surveys not being conducted per SWMU Aggregate?
2. [5.2.1.2.t.5-12] Why are gross gamma field surveys not being conducted?