

5/7/96



Department of Energy

Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505



Dear Mr. Garcia:

Subject: Los Alamos National Laboratory (LANL) Response to Notice of Deficiency (NOD) - Technical Adequacy Review of LANL RCRA Waste Analysis Plan, Rev. 0.0 EPA ID No. NM890010515-1

The enclosed information is the Department of Energy's (DOE) response to the NOD issued by the Hazardous and Radioactive Materials Bureau of the New Mexico Environment Department (NMED) and received by DOE on May 29, 1996. The NOD was developed by NMED following the review of the Transuranic Mixed Waste Analysis Plan (WAP), Rev 0.0. This WAP was submitted in March 1995, to revise the Transuranic Waste Inspectable Storage Project RCRA Permit Modification Request of September 30, 1993. The WAP has also been submitted in support of the Technical Area (TA) 50 Waste Characterization, Reduction, and Repackaging Facility, the TA-50 Decontamination Facility and the TA-54-West Radioassay and Nondestructive Testing Facility Container Storage Areas Permit Modification Request of December 22, 1995.

This submittal consists of a response to each of the eight listed deficiency items contained in the NOD, attached supplementary information as requested, and a revised copy of the WAP incorporating suggested new text in "bold/strikeout" format. The following discussion is a synopsis of the response by deficiency item number:

Deficiency #1 - Description of TRU Mixed Waste Management Units:

The waste management unit descriptions have been revised as suggested.



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Deficiency #2 - Acceptable Knowledge:

Further detail and references to elements of the DOE Waste Isolation Pilot Project (WIPP) waste certification program have been incorporated into the description of the TRU mixed waste verification program. This has been done to incorporate the WIPP waste acceptance criteria guidelines, as these will be used for waste characterization prior to storage in the domes to avoid duplication of sampling and analytical effort. The references have also been included to shorten the total length of the WAP. Because of the unapproved nature of the WIPP documents and their specific applicability to WIPP as permit conditions, language has been added to the WAP introduction to clarify that incorporation of these references is for informational purposes only. As LANL site procedures are developed to implement WIPP requirements, the WAP can be modified if the need arises.

Deficiency #3 - Real-Time Radiography (RTR):

An expanded description of the RTR characterization has been provided and referenced. The requested RTR data form is provided as Attachment 1 of the response.

Deficiency #4 - Visual Examination:

An expanded description of the visual examination procedure has been provided and referenced. The requested visual examination data form is provided as Attachment 2 of the response.

Deficiency #5 - Headspace Gas Sampling and Analysis:

Language has been suggested for the WAP that clarifies that a statistically selected subset of heterogeneous waste drums will be selected for Volatile Organic Compound (VOC) analysis. The existing language has also been revised to stipulate that only flammable gas sampling will occur when filters are inserted. The previous language was unclear regarding timing of VOC sampling and current WIPP procedure requires a temperature equalization period. In order not to duplicate analysis and not restrict the venting process, VOC sampling will be performed in subsequent storage.

Deficiency #6 - Statistical Approach for Headspace Gas and Solid Waste Sampling:

The text of WAP Section 3.3.5 has been modified to include more detail in the description of the statistical approach used for headspace gas and solid waste sampling. References to WIPP procedures and a 90 percent upper one-sided confidence limit specific to TRU mixed heterogeneous waste have been added.

Deficiency #7 - Verification of Future TRU Mixed Waste:

Further detail regarding the acceptable knowledge certification program as developed in WIPP Waste Acceptance Criteria has been included as described in the response to deficiency item #2. This response goes on to discuss the applicability of potential future permit modifications and elaborate on the use of the annual verification described in Section A.5.2 of the LANL Hazardous Waste Facility Permit.

Deficiency #8 - Procedures to Ensure Compliance with Land Disposal Restrictions (LDR) Requirements:

Section 6.3 of the WAP has been revised to provide more guidance on LDR waste characterization applicability.

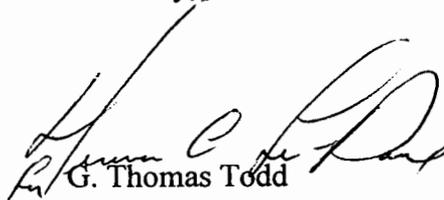
Deficiency #9 - List of References:

The suggested revision has been made.

A certification statement is provided for the revisions presented in this submittal. Electronic copies of the submittal have also been included.

I hope this submittal has addressed your concerns. If you should have any questions, please feel free to contact H. L. Plum at (505) 665-5042.

Sincerely,



G. Thomas Todd

Area Manager

LAAMEP:9JP-031

Enclosures