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National Nuclear Security Administration
 Los Alamos Site Office, MS A316
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 Los Alamos, New Mexico 87544
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Date: November 30, 2006
 Refer to: EP2006-0941

Mr. James Bearzi
 NMED-Hazardous Waste Bureau
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303

SUBJECT: REQUEST FOR EXTENSION TO IMPLEMENT ADDITIONAL SCOPE FOR MATERIAL DISPOSAL AREA C, SOLID WASTE MANAGEMENT UNIT 50-009

Dear Mr. Bearzi:

Los Alamos National Laboratory's (LANLs) Environmental Programs would like to thank you and your staff for discussions that clearly identified data needs to support environmental restoration goals pertaining to Material Disposal Area (MDA) C. Over the last several months your office has engaged both technically and proactively to resolve the issues associated with drilling between the pits at MDA C. This project has benefited from a positive history of interaction based on analysis of real-time field data and changed field conditions (including work plan updates and Documented Safety Analysis revision) which has identified new and/or modified existing scope. Our recent discussions, numerous correspondence and your September 25, 2006 letter has definitively identified the New Mexico Environment Department's requirements to complete this phase of investigation at MDA C.

As you are aware Department of Energy (DOE) and LANL agree to drill 4 boreholes between Pit 2 and Pit 3 and are well underway with additional safety requirements necessary to implement this work within a safe work environment. The re-evaluation for the need of additional boreholes began in Santa Fe at your office on June 30, 2006. Since that time, the Laboratory has been working a parallel path addressing the anticipated additional safety requirements of this work. Our primary concern with drilling these boreholes is for the safety for our personnel and the public as well as avoiding the unacceptable consequence from a contamination event which could result in very significant delays for many of our programs (environmental and other).

The work plan submitted by DOE/LANL and approved by NMED, was built on the premise that the space between the pits, that is, the width of the undisturbed tuff, would be nominally 10 feet as shown in our design drawings. The results of the geophysical surveys indicate however, that the width of the undisturbed tuff between Pits 2 and 3 is approximately 5 feet. With a margin of clearance no more than 2 feet there is a reasonable likelihood of penetrating the waste in the pits and bringing actual waste material, potentially hazardous or radioactive, to the surface. Our safety



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processes require that we plan for such an occurrence. These added safety precautions are additional scope. Addressing this issue will require a significant modification to our drilling approach and personnel protection. So great is this concern that Laboratory senior management has directed the Project to provide an independent evaluation by a third party. This independent review will provide LANL management the confidence that the work can be performed safely.

The time necessary to implement the additional scope is approximately 135 days. Our preference is to submit the Investigation Report as scheduled and furnish the supplemental analytical and geophysical data within 10 working days from data validation. If this option is not acceptable we request an extension to the due date for submission of the Investigation Report for SWMU 50-009 (MDA C) until April 14, 2007.

We appreciate the time you have spent working this safety issue and your consideration of this request. We also thank you for your support to the successful implementation of the project to date. Should you have any questions, please contact us at (505) 667-3611 or (505) 667-5808.

Sincerely,



Andrew Phelps, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,



David Gregory, Federal Project Director
Department of Energy
Los Alamos Site Office

GD/KR/ew

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