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U.S. Department of Energy
 Los Alamos Area Office, MS A316
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Date: June 26, 2000
 Refer to: ER2000-0295

Mr. John Kieling
 NMED-HRMB
 P.O. Box 26110
 Santa Fe, NM 87502

SUBJECT: DEVIATION FROM RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) FACILITY INVESTIGATION (RFI) WORKPLAN AND SAMPLING AND ANALYSIS PLAN (SAP) FOR TECHNICAL AREA (TA)-53

Dear Mr. Kieling:

The purpose of this letter is to document a deviation from the "RFI Work Plan and SAP for Potential Release Sites 53-002, 53-002(b) at TA-53", June 1998. As you are aware, the Los Alamos National Laboratory Environmental Restoration Project is planning to start a source removal associated with PRS 53-002(b), the TA-53 South Lagoon. This source removal was discussed with the New Mexico Environment Department personnel at the February 16, 2000 monthly meeting. The source removal is currently scheduled to start on July 17, 2000 and will consist of removing the radioactive sludge and Hypalon® liner from the southern lagoon at TA-53.

Following is a summary of the actions planned for the source removal.

The equipment that will be used for the source removal will be 2- forklifts, 1- rubber tired backhoe, 1- skidsteer Bobcat™ equipped with a hydraulic operated curved moldboard blade, 1- pressure washer as well as various equipment trailers.

Preparation of the site will consist of placing the waste containers in locations that will allow access to the containers and the site. The preparation will also consist of creating an access to the lagoon by opening a hole through the earthen berm that surrounds the southern lagoon. This opening will be located on the southern side of the lagoon and will be used for access into the impoundment.

The plan for removing the sludge involves consolidating the sludge at one end of the impoundment and loading it into standard B25 containers for removal to TA-54. Philip Services personnel will use a skidsteer Bobcat™ equipped with a hydraulic operated curved moldboard blade to push the sludge into piles. The moldboard blade will be equipped with a rubber cutting edge to reduce the chances of cutting or tearing the liner during sludge removal. A rubber-tired

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backhoe with a smooth-edged bucket will also be used to consolidate the sludge. Water will be sprayed onto the sludge during consolidation and loading into containers in order to control dust generation.

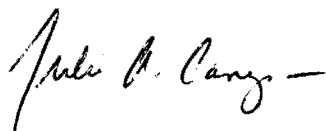
When the sludge has been consolidated and loaded into containers, the liner will be cut, rolled into manageable packages, and rapped with 6-mil. HDPE the rolls will be placed into rolloff bins.

The sludge and the liner will be disposed of as low level radioactive waste at a low-level waste pit located at TA-54.

Once the source removal is completed, characterization activities at PRS 53-002(b) will resume.

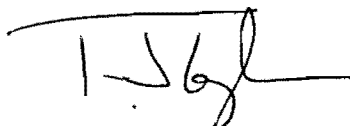
If you have any questions or concerns please feel free to call me at (505) 667-0808.

Sincerely,



Julie A. Canepa, Program Manager
Los Alamos National Laboratory
Environmental Restoration

Sincerely,



Theodore J. Taylor, Program Manager
Department of Energy
Los Alamos Area Office

JC/TT/NR/ev

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