



Department of Energy  
Field Office, Albuquerque  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

BH  
19-18-92

SEP 15 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Barbara Hoditschek  
Permit Section Coordinator  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
525 Camino de Los Marquez Place  
Santa Fe, NM 87502

Dear Ms. Hoditschek:

This letter summarizes our understanding of the regulatory requirements for the proposed Contact-Handled TRU Waste Source-Term Test Program as discussed in a meeting with the New Mexico Environment Department (NMED) staff and Los Alamos National Laboratory (LANL) personnel on July 20, 1992. At this meeting, Mr. Robert Villarreal of LANL's Analytical Chemistry Group gave a presentation on the proposed Source-Term project. Specifically, we discussed whether the Source-Term experiment met the definition of a treatability study in accordance with 40 CFR 260.10 or would be better managed under existing interim status documents for mixed waste.

In the discussion following Mr. Villarreal's presentation, we established that the scope of the project did not fall within the definition of a treatability study. Dr. Herb Grover suggested instead that LANL expand the Waste Analysis Plan (WAP) to include the Source-Term Study. Dr. Grover also suggested that the reporting requirements for a treatability study would be an adequate means of keeping your staff informed of progress in the investigation.

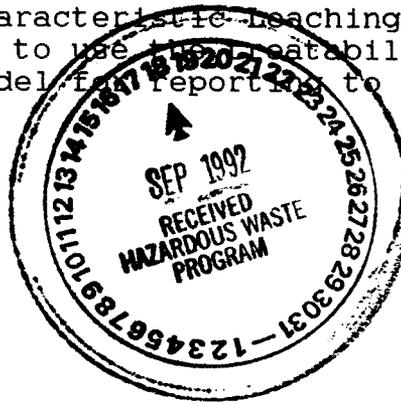
Because we agree that the Source-Term experiment does not qualify as a treatability study, and because it will result in better characterization of the waste and its behavior in proposed repository, we intend to modify the WAP as Dr. Grover suggested, to include analytical work performed in the Source-Term experiment. Under this proposal, TRU mixed waste would be further characterized for volatile and semi-volatile organic compounds and Toxic Characteristic Leaching Procedure metals. We also would propose to use the treatability study reporting requirements as a model for reporting to your office.

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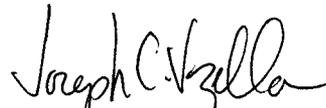
Ms. Hoditschek

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If you would like to discuss this matter further or if you have any questions, please contact Jon Mack of my staff at 665-5026.

Sincerely,



Joseph C. Vozella, Acting Chief  
Environment, Safety, & Health  
Branch

LESH:1JV-015

cc:

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