



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
**DOE OVERSIGHT BUREAU**  
P.O. Box 1663, MS/J-993  
Los Alamos, New Mexico 87545

MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

September 25, 1996

Mat Johansen, LAAO AIP  
Point of Contact  
U.S. Department of Energy  
Los Alamos Area Office  
MS A316  
Los Alamos, NM 87545

**RE: Review of Los Alamos National Laboratory's proposed  
"Modification to RFI Work Plan for OU 1148" dated July 17,  
1996.**

Dear Mr. Johansen:

DOE Oversight Bureau (DOB) has reviewed the subject document. The following comments are provided for the purpose of communicating the results of the review. They are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department.

**General Comments:**

1. DOE OB staff appreciate the spirit of this proposal, particularly the use of existing environmental surveillance data in an environmental restoration investigation. The use of existing data, of equivalent quality and from similar sampling locations as that described in the work plan, may be helpful in reducing sampling costs.
2. It is not clear if the existing data can be used to perform ecological risk assessment calculations. A discussion should be provided regarding the suitability of the existing data for ecological risk assessment.

**Specific Comments:**

1. § 2.2.1, Page 2, Environmental Surveillance Groups Sampling

"ESH-19 also used single-stage water samplers (which accumulate surface water runoff samples at the beginning of a runoff event)..."

The use of single stage water samplers may not collect samples that represent concentrations during the entire runoff event. We suggest an additional investigation to relate concentrations of potential contaminants present in the water at the beginning of a runoff event to concentrations of potential contaminants in the water throughout the entire runoff event.

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OU 1148

LANL/ER/7ANL  
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**2. § 2.2.1, Page 2, Environmental Surveillance Groups Sampling**

The proposal should state if the surface water samples taken by the environmental surveillance group were analyzed for dissolved or total constituents.

**3. § 3.2, Page 8, Surface Water Sampling**

"Results for the radionuclides analyzed suggest that these three radionuclides, which would have been deposited by similar mechanisms, can be expected to be found in similar low concentrations, in particular, at concentrations below their respective SALs."

The final concentration of a given contaminant in the environment may be related to the source term concentration. If the source term concentration varies for different radionuclides, the concentration in the migration pathway may vary. For this reason, and because it may be necessary to have sufficient data to do a multiple constituent evaluation, limited sampling may be needed to confirm any presumed low concentrations.

**4. § 3.1, Page 5, Tritium - Bearing Soils**

The first bullet states that "scattering of material from active pits by natural phenomena..." may result in the availability of contaminants for transport.

Specifics should be provided regarding these "natural phenomena". If there has been any work done to mitigate the phenomena, the work should be described.

If there are any questions, please contact me at 505-672-0448 or Chris Hanlon-Meyer of the DOE Oversight Bureau Technical Support staff at 505-827-1536.

Sincerely,



Steve Yanicak, LANL POC  
Department of Energy Oversight Bureau

SY:CHM:chm

cc: Neil Weber, NMED, Chief, DOE OB  
Benito Garcia, NMED, Chief, HRMB  
Jim Piatt, NMED, Chief, SWQB  
M. Gilgosh, DOE FU-5 FPC, MS A316  
D. Krier, LANL, FU-5 FPL, MS D462