



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

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MAY 12 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Kieling
 RCRA Permitting Program
 Hazardous and Radioactive Materials Bureau
 New Mexico Environment Department
 2044 Galisteo Street, Building A
 P. O. Box 26110
 Santa Fe, NM 87505



Dear Mr. Kieling:

Subject: Follow-up to the April Monthly Meeting on Drum Retrieval at the TWISP Facility at Los Alamos National Laboratory (LANL)

The purpose of this letter is to follow up on our discussion on the TWISP drum retrieval project as promised in the April monthly meeting. Due to unforeseen developing conditions, we requested that the process we committed to in the Amended Remedial Action Plan (ARAP) to remove the drums from the stack needed to be modified for safety purposes.

Approximately 4,900 drums of Transuranic (TRU) waste were originally stored on Pad 1 at TA-54, Area G. To date, approximately 4,100 drums have been successfully retrieved and placed into appropriate storage. Soil used as a firebreak inside the waste container stack on Pad 1 is exerting pressure on the remaining drums. As result, these drums are leaning outward (forward) to such a degree that TWISP safety personnel want to minimize contact with containers on the top and front of the stack.

We proposed a modified retrieval procedure at the April monthly meeting. As discussed, our proposal conflicts with the TWISP ARAP. The modified procedures described below will allow the TWISP to continue retrieval operation in a manner which provides for worker safety and protects the environment.

The ARAP states the "Drums that fail the visual inspection will be reinforced and overpacked in situ before their removal from the stack." Due to the unstable configuration of the waste stack, we propose instead to retrieve and overpack (if necessary) once drums are staged within the retrieval dome (Dome 226) in a designated

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John Kieling

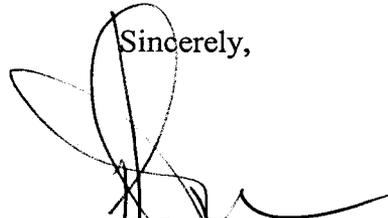
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MAY 12 1998

area where further visual inspection can occur. Additionally, LANL proposed to retrieve drums from the stack and perform a radiological swipe survey once the drum has been lowered to the ground. Operational experience and the successful retrieval of approximately 4,100 drums have shown that a radiological contamination problem on the exterior of the drums does not exist.

? In our discussion at the April monthly meeting everyone from the permitting and enforcement staff at HRMB was in agreement with these changes. With that agreement, we will now begin to implement these new procedures. If you should have any questions concerning this letter, please contact me at (505) 665-5042.

Sincerely,



H. L. "Vody" Plum
Office of Environment

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