

**ENVIRONMENTAL  
RESTORATION  
PROJECT**

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Date: May 2, 2002  
Refer to: ER2002-0323

Mr. John Young, Corrective Action Project Leader  
Permits Management Program  
NMED – Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1  
Santa Fe, NM 87505-6303



**SUBJECT: SUBMITTAL OF THE MARCH 2002 CORRECTIVE MEASURES  
STUDY (CMS) PROGRESS REPORT FOR MATERIAL DISPOSAL  
AREA (MDA) H, POTENTIAL RELEASE SITE (PRS) 54-004 AT  
TECHNICAL AREA (TA) 54**

Dear Mr. Young:

Enclosed please find three copies of the "Progress Report for the Corrective Measures Study for Material Disposal Area H, Potential Release Site 54-004, at Technical Area 54, March 2002." This progress report is submitted in accordance with the reporting conditions outlined in Section R, *Scope of Work for a Resource Conservation and Recovery Act Corrective Measure Study at the Laboratory, Task IX, Reports, Part A, Progress of Module VIII of the Laboratory's Hazardous Waste Facility Permit*. The CMS Plan for MDA H (LA-UR-01-1629) was approved in your letter dated December 7, 2001, (HWB-LANL-01-002).

Please contact John Hopkins at (505) 667-9551 or Woody Woodworth at (505) 667-5820, if you have any questions.

Sincerely,

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

Sincerely,

Mat Johansen, Project Manager  
Department of Energy  
Office of Los Alamos Site Operations



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Enclosure: MDA H March 2002 CMS Progress Report

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ENVIRONMENTAL  
RESTORATION  
PROJECT

A Department of Energy  
Environmental Cleanup Program

LA-UR-02-2471

April 2002

ER2002-0304

Monthly Progress Report for  
Corrective Measures Study for  
Material Disposal Area H,  
Potential Release Site 54-004,  
at Technical Area 54  
March 2002



Los Alamos NM 87545

Prepared by the Material Disposal Areas Focus Area

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## **1.0 INTRODUCTION**

This progress report summarizes Los Alamos National Laboratory (the Laboratory) activities completed during March 2002 on the corrective measures study (CMS) for Material Disposal Area (MDA) H, Potential Release Site (PRS) 54-004, at Technical Area (TA) 54. The completed activities are described in the CMS plan (Environmental Restoration Project 2001, 70319), which was approved by the New Mexico Environment Department (NMED) Hazardous Waste Bureau on December 7, 2001. These activities and other related operations are summarized below.

## **2.0 DESCRIPTION OF ACTIVITIES AND CONTACTS**

### **High-Performing Team Activities**

The MDA High-Performing Team (HPT) met on Friday March 22, 2002 to review Sections 1 and 2 of the MDA H CMS report.

### **Resource Conservation and Recovery Act Facility Investigation (RFI) Addendum**

Analytical data was received for vadose zone samples collected during December 2001 from boreholes 54-1023, 54-15461, and 54-15462. Data validation is scheduled to be complete by mid-April. Work on the RFI addendum continued during March and upon receipt, the validated data will be evaluated and incorporated in the addendum.

### **CMS Report**

The Laboratory completed comment resolution with the internal Laboratory and DOE EM-50 peer reviewers. Comments received from NMED staff during the March 22<sup>nd</sup> HPT meeting are being incorporated in Sections 1 and 2 of the report.

### **Public and Stakeholder Involvement**

During the February 14, 2002 focus group meeting, George Rice was selected by focus group members to be the independent peer reviewer for the MDA H CMS Report. Mr. Rice was contacted several times in March about his availability to conduct the independent peer review. Mr. Rice requested time to contact other groups he works for to ensure that there will be no conflict of interest in conducting the independent peer review.

### **Contacts**

The MDA H CMS contacts are unchanged from the list provided in the first progress report (Environmental Restoration Project 2002, 71479).

## **3.0 PERCENTAGE OF CMS COMPLETED**

The Laboratory estimates that 81% of the CMS has been completed.

#### 4.0 PROBLEMS ENCOUNTERED/ACTIONS TO RECTIFY PROBLEMS

The status of the five problems described in the first two progress reports is unchanged (Environmental Restoration Project 2002, 71479; Environmental Restoration Project 2002, 72612). The problems and actions to rectify them are as follows:

*Problem 1.* NMED has not yet concurred with the Laboratory's proposed site conceptual model, including assumptions about site geology and hydrogeology.

*Problem 2.* The target levels (for modeling) have not yet been identified and agreed upon.

*Problem 3.* DOE and the Environmental Protection Agency base the assessment of risk from radionuclides on dose; NMED bases the assessment of risk from all hazardous constituents in excess of an incremental cancer risk of 10<sup>-5</sup>.

*Problem 4.* The Concerned Citizens for Nuclear Safety and other focus group members have requested that an independent review of the MDA H CMS be conducted.

*Problem 5.* NMED requested that the Laboratory demonstrate how the proposed corrective measure will meet requirements stated in 40 CFR Part 264, Subparts G and F, "Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities." The closure/postclosure care requirements are deemed applicable to MDA H primarily because shaft 9 is considered a *regulated unit*.

*Actions to Rectify Problems 1, 2, and 3.* The MDA HPT scheduled meetings with modeling and regulatory compliance personnel during March and April 2002 to review the basis for the models, assumptions about site geology and hydrology, contaminant fate and transport, and regulatory issues.

*Action to Rectify Problem 4.* Focus group members were provided with the resumés of seven individuals to review the MDA H CMS report before the February 26, 2002, focus group meeting. The top three candidates for independent reviewers were Stan Peterson, George Rice, and Bernd Franke, each of whom was discussed during the meeting. Rice was selected as the independent peer reviewer and has been contacted about performing the independent peer review. Rice was contacted in March and stated that he had to get agreement from other clients that he could perform the independent peer review because it was being funded by DOE.

*Action to Rectify Problem 5.* The CMS report for MDA H will include a crosswalk, which will identify applicable closure/postclosure care requirements and show how the proposed corrective measure satisfies each requirement. The crosswalk will also reference the specific CMS report section describing how the different aspects of the proposed corrective measure meet the corresponding closure/postclosure care requirements.

#### 5.0 KEY PERSONNEL CHANGES

There have been no changes in key personnel from the list provided in the first progress report (Environmental Restoration Project 2002, 71479).

## **6.0 PROJECTED WORK FOR APRIL 2002**

### **HPT Proceedings and Decisions**

An HPT meeting is scheduled for April 23, 2002, to review modeling assumptions applied in the CMS.

### **Resource Conservation and Recovery Act Facility Investigation Report and Addendum**

NMED will continue to review the Laboratory's response to the RSI on the MDA H Resource Conservation and Recovery facility investigation (RFI) report, and the Laboratory will continue to assess the preliminary analytical data from volatile organic compound and tritium samples collected from three boreholes at MDA H during December 2001, as requested by NMED (Young 2001, 71537). Work will continue on the RFI addendum scheduled for submittal to NMED in April 2002.

### **CMS Report**

Technical editing of the CMS report will begin in April. The MDA HPT will review the CMS report during meetings. Specifically, Environmental Restoration Project personnel will meet with NMED to discuss modeling assumptions.

Work will continue on the preparation of the closure/postclosure care corrective measure crosswalk for inclusion in the CMS report.

### **Public and Stakeholder Involvement**

As requested by the MDA H focus group, a scope of work will be developed for the independent peer review of the CMS report. The focus group agreed to meet on June 4, 2002 (tentatively), at the Cities of Gold from 3:30 to 6:30 pm. Before the June meeting, the group expects to receive the results of the independent peer review and the December 2001 borehole monitoring data. During the meeting, the group is expected to provide a final recommendation(s) to the Laboratory on the preferred corrective measure alternative.

## **REFERENCES**

Environmental Restoration Project, March 2001. "Corrective Measures Study Plan for Material Disposal Area H at Technical Area 54," Los Alamos National Laboratory report LA-UR-01-1629, Los Alamos, New Mexico. (Environmental Restoration Project 2001, 70319)

Environmental Restoration Project, February 2002. "Progress Report for Corrective Measures Study for Material Disposal Area H, Potential Release Site 54-004, at Technical Area 54, April through December 2001," Los Alamos National Laboratory report LA-UR-02-0328, Los Alamos, New Mexico. (Environmental Restoration Project 2002, 71479)

Environmental Restoration Project, March 2002. "Monthly Progress Report for Corrective Measures Study for Material Disposal Area H, Potential Release Site 54-004, at Technical Area 54, February 2002" Los Alamos National Laboratory report LA-UR-02-1345, Los Alamos, New Mexico. (Environmental Restoration Project 2002, 72612)

Young, J., December 3, 2001. "Additional Fieldwork at MDA H, 54-004," New Mexico Department letter HWB-LANL-01-001 to J. Browne and M. Johansen from J. Young, Santa Fe, New Mexico. (Young 2001, 71537)