

TA-54

**ENVIRONMENTAL
RESTORATION
PROJECT**

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Date: August 6, 2002
Refer to: ER2002-0531

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 JUNE 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, June, 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,

David McInroy, Acting Program Manager
Environmental Restoration Project
Los Alamos National Laboratory

Sincerely,

Everett Trollinger, Project Manager
Department of Energy
Office of Los Alamos Site Operations



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Mr. John Young
ER2002-0531

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August 6, 2002

DM/ET/JH/vn

Enclosure: MDA H June 2002 CMS Progress Report

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ENVIRONMENTAL
RESTORATION
PROJECT

A Department of Energy
Environmental Cleanup Program

LA-UR-02-4434

July 2002

ER2002-0483

Monthly Progress Report for
Corrective Measures Study for
Material Disposal Area H,
Potential Release Site 54-004,
at Technical Area 54
June 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 June 2002 on the corrective measures study (CMS) for Material Disposal Area (MDA) H, Potential Release Site (PRS) 54-004, at Technical Area 54. The completed activities are described in the CMS plan (Environmental Restoration Project 2001, 70319), approved by the New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) on December 7, 2001. These activities and other related operations are summarized below.

2.0 DESCRIPTION OF ACTIVITIES AND CONTACTS

2.1 High-Performing Team Activities

The draft MDA H RCRA Facility Investigation (RFI) Report Addendum was submitted to HPT members in June 2002.

2.2 Resource Conservation and Recovery Act Facility Investigation Addendum

The draft of the RFI Addendum, describing the results of supplemental 2001 fieldwork at MDA H, was completed and submitted to HPT members for review and comment.

2.3 CMS Report

The Laboratory continued comment resolution with the internal peer reviewers, specifically with reviewers from the Regulatory Compliance Focus Area on Sections 3, 4, and 5 of the MDA H CMS report. Sections 4 and 5 were revised to incorporate Regulatory Compliance Focus Area comments.

2.4 Public and Stakeholder Involvement

There were no Public or Stakeholder Involvement activities conducted in June 2002. Mr. Rice, the independent reviewer selected by the focus group members, was sent a copy of the MDA H RFI report so he can better review the CMS report. The RFI Addendum will be sent to Mr. Rice after receipt and incorporation of NMED comments.

3.0 PERCENTAGE OF CMS COMPLETED

The Laboratory estimates that 87% of the CMS has been completed.

4.0 PROBLEMS ENCOUNTERED/ACTIONS TO RECTIFY PROBLEMS

The status of the five problems described in the May 2002 progress report is unchanged (Environmental Restoration Project 2002, 73269). 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^{-5} .

Actions to Rectify Problems 1, 2, and 3. Section 3 of the CMS Report was revised in May 2002 to incorporate comments received from NMED during the April 23, 2002, HPT meeting, which essentially required that the majority of the modeling information be removed from the report because NMED has not yet concurred with the Laboratory's proposed site conceptual model, including assumptions about site geology and hydrogeology. Target levels (for modeling) have not yet been identified and agreed upon, and the DOE dose versus NMED risk issue has not been resolved. Therefore, Problems 1, 2, and 3 described above still remain to be addressed.

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.

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. Mr. Rice was selected as the independent peer reviewer and has agreed to perform the independent peer review upon completion of the MDA H CMS report. Mr. Rice was provided a copy of the MDA H RFI Report to provide background information in anticipation of his pending review of the MDS H CMS Report.

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/post-closure care requirements are deemed applicable to MDA H primarily because shaft 9 is considered a *regulated unit*.

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

5.0 KEY PERSONNEL CHANGES

Eliza Frank resigned from the NMED as of April 26, 2002, and Neelam Dhawan has become the main NMED-HWB point of contact. Dave Cobrian, NMED-HWB, is now providing technical support to Ms. Dhawan. There are no changes to the MDA H CMS contacts from the list provided in the first progress report (Environmental Restoration Project 2002, 71479) and the update provided in the May 2002 progress report (Environmental Restoration Project 2002, 73269).

6.0 PROJECTED WORK FOR JULY 2002

6.1 HPT Proceedings and Decisions

If necessary, the HPT will meet in July to review the MDA H RFI Addendum.

6.2 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 RFI report, and the draft MDA H RFI Addendum.

6.3 CMS Report

Technical editing of the report started in late June. The draft MDA H CMS report will be submitted to the HPT by September 30, 2002.

6.4 Public and Stakeholder Involvement

The focus group meeting scheduled for June 4, 2002, has been postponed until the CMS report is finalized and reviewed by Mr. Rice. During the meeting, the group is expected to provide a final recommendation(s) to the Laboratory on the preferred corrective measure alternative. The MDA H CMS report will be sent to Mr. Rice for review at the same time it is formally submitted to NMED final review.

7.0 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-02-1454, Los Alamos, New Mexico. (Environmental Restoration Project 2002, 72612)

Environmental Restoration Project, April 2002. "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 National Laboratory report LA-UR-02-2471, Los Alamos, New Mexico. (Environmental Restoration Project 2002, 72712)

Environmental Restoration Project, May 2002. "Monthly Progress Report for Corrective Measures Study for Material Disposal Area H, Potential Release Site 54-004, at Technical Area 54 May 2002," Los Alamos National Laboratory report LA-UR-02-3806, Los Alamos, New Mexico. (Environmental Restoration Project 2002, 73269)

Young, J., December 3, 2001. "Additional Fieldwork at MDA H, 54-004," New Mexico Department letter HWB-LANL-01-001 to J. Browne (Laboratory director) and M. Johansen (DOE project manager) from J. Young (NMED), Santa Fe, New Mexico. (Young 2001, 71294)