

TA-73

Department of Energy
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544

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Mr. James Bearzi
State of New Mexico
Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Addendum to Interim Measures Plan for Potential Release Site 73-001(a)

Dear Mr. Bearzi:

The enclosure is the addendum to the Interim Measures Plan for PRS 73-001(a). The addendum specifies the methods intended for use in the debris removal phase of this project and provides a schedule for completion. DOE intends to execute this plan as soon as possible according to the schedule provided.

Please address any questions regarding this plan or addendum to David Gregory at (505) 667-5808.

Sincerely,

David R. Gregory
for

Everett Trollinger
Team Lead
Environmental Restoration

OPM-7DG-0003-0002

Enclosure a/s

cc:

- J. Young NMED HWB
- D. Gregory LASO-OPM
- T. Rust RRES/R, LANL, MS-M992
- D. McInroy RRES/R, LANL, MS-M992
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**Addendum to
Interim Measures Plan
For
Potential Release Site 73-001(a), Debris Removal**

Purpose: The Interim Measure Plan submitted to NMED, Hazardous Waste Bureau, August 7, 2002 provided the following project information; rationale, objectives, cleanup criteria site type and description information from previous RFI Investigations, site restoration, post remediation confirmatory sampling, estimated types and volumes of waste and anticipated method of management and disposal. Appendix B of the IM Plan is a discussion and evaluation of several options for the actual removal however, the plan does not specifically identify the method(s) to be used to pick up, retrieve and transport debris items from the four drainages to staging areas prior to hauling off-site. This addendum specifies the methods to be used in the removal phase of this project and provides a schedule for completion.

Background:

The primary impetus on this project is compliance with both state and federal surface water regulations. A team comprised of DOE, UC, and NMED members drafted an IM Plan that specified that the debris removal phase of this project would be accomplished by use of manual labor and helicopter for lifting debris to the mesa top staging area. In the final review of the IM Plan selected by the integrated project team, management at both DOE as well as LANL suggested a re-evaluation of removal methods to determine if other cost effective technologies are available that would provide a greater margin of safety. Although use of helicopter for lifting material from steep side slopes is routine for certain situations, there is concern on DOE's part that the value added to the public and the environment do not warrant the risks associated with using a helicopter to remove legacy debris from ephemeral arroyos.

At a meeting held in the NMED, Hazardous Waste Bureau Office on April 15, 2002, DOE informed HWB and SWQB team members of DOE's decision to pursue a removal method that could offer a greater margin of safety. Around the May 2002 time frame, RRES-R (formerly LANL-ER) began working to develop a cost estimate for an alternative method.

Removal Methods:

Manual Removal. All of the methods considered in this plan require that each debris item be touched or moved manually. Whether debris is lifted by crane or helicopter or attached to a cable pulley system, there would be a need for debris to be handled by workers for consolidation or loading into baskets, carts or carriages to be retrieved and transported by the cable system described below. There are considerable debris scattered along each of the four drainages. Debris items that can not conveniently or efficiently be retrieved and removed by mechanical methods will be carried manually down the nearest drainage to staging points at the bottom of Pueblo Canyon for pick up. Some of the heavy or bulky items will require dismantling by cutting or chopping prior to carry out. No spark or flame generating equipment will be used without precautions in place for managing fire hazards.

Mechanical Removal. The greatest volume of debris will be removed using a Skyline cableway and carriage system. These systems are very effective in removing material from environmentally sensitive areas with steep and undulating terrain such as the north side of Pueblo

Canyon. By using this system DOE will be able to remove all required debris as specified in the IM Plan and at the same time minimize impacts to the environment. In general this system calls for rigging a cable from a crane or tower, on the mesa top at the Los Alamos County Airport, to an anchor point positioned near the road at the bottom of Pueblo Canyon. Debris will be loaded into a carriage suspended from this stationary cable. A second cable will extend from a reel fixed below the tower, to the carriage. The carriage is mobilized as the cable is reeled in. Once the carriage is emptied of debris it is returned to an area along the drainage for reloading. The cable system may be repositioned to change alignments for debris retrieval as needed. Ambient atmospheric conditions at the site will be monitored by photo ionization detector and portable particulate samplers during the removal phase of this project.

Schedule.

Mobilization to Site	May 15*
In-progress review Meeting With DOE/NMED	June 26
Final Debris Removed	Aug 29
On-Site Meeting with NMED, DOE and Sampling Contractor	Sept 2
Confirmatory Sampling, complete	September 10
Preliminary Analytical	Nov 14
Validated Analytical	Dec 5
Draft IM Completion Report to NMED	Dec 23

*Assuming that access restrictions imposed for threatened and endangered species are lifted.