



**PUBLIC SERVICE COMPANY OF NEW MEXICO**

ALVARADO SQUARE ALBUQUERQUE, NEW MEXICO 87158

*file: PNMTE/wed/91*

November 21, 1991

Hand Delivered

Mr. Joe Kennedy  
New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau (HRMB)  
525 Camino de Los Marquez  
Santa Fe, NM 87502

Dear Mr. Kennedy

Subject: Proposal For Groundwater Assessment  
Program in Response to Corrective Action  
Directive Issued September 18, 1991,  
Person Generating Station, NMT360010342

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
Jack D. Maddox

Director, Resources and Nuclear Services

This letter and its enclosures comprise Public Service Company of New Mexico's (PNM's) proposal for a groundwater assessment program to be initiated in response to a Corrective Action Directive (CAD) issued under RCRA Permit NMT 360010342, for the Person Generating Station.

You will note that the proposal presented here has been modified since our meeting of November 14, 1991, in response to certain concerns expressed by you and Dr. Swanton. Specifically, PSMW-13 and PSMW-14 (See

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Attachment C) have been added to address your concern that higher contaminant concentrations may exist beyond PSMW-6 and PSMW-8A. Also, a second flow zone piezometer (PSPZ-1) has been added approximately 400 feet southeast from PSMW-3B to improve data available to assess groundwater flow directions in the second flow zone.

You will also note that proposed well PSMW-11 has been moved further south because our most recent groundwater sampling data (October 1991) suggests that the horizontal limit of the contaminant plume is closer to PSMW-5 than it is to PSMW-8A.

The enclosures are comprised of the document Response Information To Corrective Action Directive NMT360010342 Issued For Person Generating Station, a Water Well Journal Article from August 1991, and a copy of The Composite Interpretive Method of Logging Drill Cuttings, Oklahoma Geological Survey, 1964. The Response Information document is divided into twelve sections, further described below, and specifically identified as Attachments A, B, C, and D, and Exhibits 1 through 8. Attachments A through D correspond to like identified sections of attachments to the CAD prepared by HRMB. Exhibits 1 through 8 are supplemental information required by the CAD to be submitted as part of our proposal.

To aide the HRMB in their comparison of their model proposal (Attachments A through D of the CAD), we have reproduced those attachments and have denoted our changes by standard editorial markings (i.e., text to be deleted is marked through, new text is underlined). Preceding each Attachment is a referenced narrative explanation of each change made to the section.

Each section of the proposal is briefly described below:

Attachment A is PNM's proposed Technical Schedule for the groundwater assessment plan. In some cases, information required by HRMB to be included as part of the submittal have been incorporated into the schedule, while other required information is included as exhibits.

Attachment B is an overview of the groundwater assessment program.

Attachment C is a sketch map of existing and proposed well locations.

Attachment D is a sampling and analysis plan.

Exhibit 1 is a narrative description of the investigatory approach that will be used to fully characterize the horizontal and vertical rate and extent of contaminant migration offsite from Person Generating Station. This description includes data analysis procedures that will be used to interpret the analytical data, documentation of appropriateness of soil gas surveys, a description of sampling parameters, and a sampling schedule (Reference Items 2.C, 2.E, 2.H, 2.I, and 2.J, of the Technical Schedule).

(Kennedy)

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Exhibit 2 is a table showing number, location, and depth of wells to be initially installed (Reference Item 2.D of Technical Schedule). This table includes a tentative identification to be applied to each newly proposed well.

Exhibits 3 through 6 are narrative and schematic descriptions of proposed well construction information (Reference Item 2.F of Technical Schedule).

Exhibit 7 is a schedule of implementation which sets specific dates for the completion of each phase of the assessment program (Reference Item 2.L of the Technical Schedule).

Exhibit 8 is PNM's proposed Health and Safety Plan to be adhered to by all PNM personnel, PNM contractors (and their subcontractors), NMED regulators, and any visitor to the site during the implementation of this groundwater assessment program.

If you have any questions, please contact me at 848-2998.

Sincerely,



Ron D. Johnson  
Sr. Environmental Scientist

RDJ:krl  
enclosures