



U.S. Department of Energy
Albuquerque Operations Office
Kirtland Area Office
P.O. Box 5400
Albuquerque, NM 87185-5400
MAR 09 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert S. (Stu) Dinwiddie, Manager
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
RCRA Permits Management Program
2044 Galisteo Street
P.O. Box 26110
Santa Fe, NM 87505-2100

Dear Mr. Dinwiddie:

We have received your letter of February 13, 1998, regarding the inspection and joint Sandia/NMED sampling of the abandoned mine designated as ER Site 28-2. The mine entry and sampling activities are tentatively scheduled for April 7th or 8th depending on the availability of the MSHA inspector.

The basic OSHA training requirements for all sampling team members and NMED personnel wishing to enter with the sampling team are listed below (The confined space entry supervisor must review all required documents before he will allow entry. These documents must be provided to Mike Young of SNL prior to the date of sampling):

1. Confined space entrant training certificate (29 CFR 1910.146).
2. Medical clearance letter for potential respiratory use (this letter must be from the doctor or hospital/clinic that does your physicals) (29 CFR 1910.120).
3. Respiratory training (29 CFR 1910.120) since the entry team must be prepared to go into PAPRs with HEPA filter cartridges if instructed by the Site Safety Officer. NMED personnel are expected to supply their own respirators and cartridges.
4. 40 hr OSHA Health and Safety Training Course for Hazardous Waste Operations (29 CFR 1910.120).
5. 8 hr OSHA Refresher (29 CFR 1910.120).

The NMED personnel must be on the buddy system, therefore, two NMED personnel will have to enter the mine. NMED personnel cannot go in as part of the

SNL 1095



HSWA SNL 133a

Sandia confined space entry team, and must go in under their own Health and Safety Plan (HASP). The NMED team can follow the Sandia team only if space permits, and the MSHA inspectors agrees. There are 4 people required on the entry team (counting the MSHA inspector) and more personnel may cause an unacceptable safety/egress issue. The Confined Space Entry Supervisor and the Site Safety Officer will have operational control of all personnel, including regulators, for the duration of the mine entry.

NMED has requested split samples. Since there does not appear to be enough room for Sandia sampling personnel and NMED personnel in the sampling area at the same time based on photographs and NMED personnel comments, SNL/NM proposes the following protocol: Sampled material from each location, to the extent available, will be placed in a stainless steel bowl and passed back to the sampling support member. The sampling support member will split the sample into two parts and offer either part to the NMED personnel. NMED will select one part and containerize and seal their sample. Minimal volumes of residue are expected in the sampling area. To minimize the sample volumes required for metals, HE, and gross alpha/gross beta analysis, NMED should use the smallest and fewest sample containers possible. NMED will handle all sampling requirements for their splits, except as discussed below.

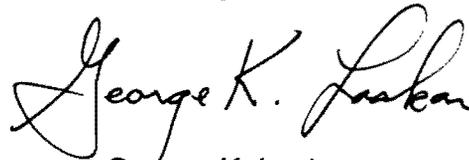
The site is a Radioactive Materials Management Area (RMMA). Sandia/DOE RMMA procedures require the outside of each sample container to be swiped for radioactivity, then taken to the Radiation Protection Lab and counted. This count requires 4-6 hours for 10 containers. In addition, the gamma spec samples must be counted before any of the samples can be released. Sandia is planning to sample a total of 10 locations that will require gamma spec analysis. The count time is 100 minutes per sample. At least 20% of the samples must be counted to release all the samples. It is suggested that NMED samples be sealed with evidence tape and locked in an on-base refrigerated storage area until the samples are counted. If this is not acceptable, arrangements to count the samples after the sampling event, with NMED personnel present to maintain chain-of-custody, may be possible. It should be noted that none of the samples, including gamma specs, will be opened regardless of which approach is taken.

S. Dinwiddie

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If you have any questions, please contact John Gould at (505) 845-6089, or Mark Jackson at (505) 845-6288.

Sincerely,

A handwritten signature in black ink that reads "George K. Laskar". The signature is written in a cursive style with a large, looping initial "G".

George K. Laskar
Assistant Area Manager

cc:

D. Bourne, ERD, AL
W. Cox, SNL, MS 1147
D. Fate, SNL, MS 1148
C. Byrd, SNL, MS 1148
J. Parker, NMED-OB
R. Kennett, NMED-OB
S. Kruse, NMED
S. Hoines, NMED
W. Moats, NMED

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