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JAN 2009
NMED Hazardous Waste Bureau

National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-4255/FAX (505) 606-2132

Date: January 16, 2009
Refer To: EP2009-0010

James P. Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Information Concerning the Technical Area 21 Subsurface Vapor Moisture Monitoring Plan for Tritium, July 2008

Dear Mr. Bearzi:

The U.S. Department of Energy (DOE) is in receipt of the New Mexico Environment Department's (NMED's) Notice of Disapproval letter, dated December 30, 2008, concerning the Subsurface Vapor Moisture Monitoring Plan for Tritium (the Plan). DOE appreciates and values the comments provided by NMED and provides this response.

The purpose of the Plan was to propose data collection to assess the nature and extent of subsurface, vapor-phase tritium at Technical Area 21 (TA-21), and the Plan will be implemented under DOE's statutory authority from the Atomic Energy Act (AEA) of 1954, as amended. The Los Alamos Site Office (LASO) manages radioactive wastes and releases of radionuclides to be protective of workers, the public, and the environment in accordance with DOE directives for Radiation Protection of the Public and the Environment and Radioactive Waste Management. These and other directives require evaluation of the current and future performance of radioactive-contaminated sites, including the closure and monitoring of these sites. This radiological performance process is ongoing. Pursuant to DOE policy, the Plan was provided to NMED for informational purposes, rather than for review and approval. Therefore, this information is not subject to approval under the Compliance Order on Consent.

The initial activities described in the Plan include installation of tritium vapor-monitoring wells at Material Disposal Areas (MDAs) T and V because these were liquid disposal sites that LASO believed required additional data to assess nature and extent. Additional data are required because LASO has not been able to identify a clear correlation between tritium measured in moisture extracted from core samples and tritium in soil vapor. Ongoing tritium monitoring at TA-21 (e.g., MDAs A and B) will be evaluated. LASO will conduct investigations to define the extent of tritium in soil vapor in the vadose zone and monitor for changes in tritium over time. LASO will evaluate the tritium data from TA-21 and modify the tritium monitoring to fulfill its obligations under the AEA. LASO will share the tritium data with NMED, according to DOE policy.

If you have any questions, please contact Ron Rager at (505) 665 4065 (rrager@lanl.gov) or George Henckel at (505) 606-0960 (ghenckel@doeal.gov).

Sincerely,

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

David R. Gregory, Project Director
Environmental Operations
Los Alamos Site Office

MG/DG/AC/RR:sm

Enclosure: Information Concerning the Technical Area 21 Subsurface Vapor Moisture Monitoring Plan for Tritium, July 2008

Cy: Neil Weber, San Ildefonso Pueblo
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RPF, MS M707 (with two CDs)
Public Reading Room, MS M992
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Steve Yanicak, NMED-OB, White Rock, NM
Kristine Smeltz, WES-DO, MS M992
EP-TA-21 File, MS C349
Tom Skibitski, NMED-OB, Santa Fe, NM
Keyana DeAguero, DOE-LASO (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991
Alison M. Dorries, WES-DO, MS M992
Allan Chaloupka, EP-TA-21, MS C349
IRM-RMMSO, MS A150 (date-stamped letter emailed)