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FEB 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: February 13, 2009
Refer To: EP2009-0105

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: Request for Relief on the Submittal of the General Facility Information Component #9 - Hydrogeologic Site Atlas

Dear Mr. Bearzi:

As stipulated in the Compliance Order on Consent, Section IV.A.2, General Facility Information,

> "The Respondents shall submit to the Department the following information. These submittals are one-time submittals, unless new information becomes available. In that case, the affected submittals shall be updated and resubmitted annually:
>
> 9. The Facility's existing Hydrogeologic Atlas .....
>
> The information shall be submitted to the Department..... beginning 30 days after the effective date of this Consent Order, and no later than March 31 of each subsequent calendar year."

The Respondents intend to submit the annual update of General Facility Information on March 31, 2009, as stipulated, but without item #9, the Hydrogeologic Site Atlas. The purpose of this letter is to request relief in submittal of the Site Atlas component. The Respondents request relief of 90 days, with a submittal date of June 30, 2009. The reason for requesting this relief is the time required for importing the geologic and hydrogeologic information created by the Geologic Framework Model (GFM) onto map surfaces. The 2008 GFM constituted a major revision to the 2005 GFM. The reviewed and qualified version of the 2008 GFM was just completed in late January. Hence, it has not been possible to produce map surfaces in time for incorporation into the GFI. In addition, because of the major revision, the Site Atlas will be a standalone document in 2009, as it was in 2006. This type of off-cycle schedule occurs whenever the GFM goes through a major revision. Recall that this situation occurred with delivery of the 2006 Site Atlas and the New Mexico Environment Department (NMED) granted our request for a 90-day extension.

The situation of having a major revision to the GFM in 2008 was discussed with your staff on August 8, 2008. At that time we also discussed the format and content of the 2009 Site Atlas. NMED staff acknowledged the precedent set with the previous major revision of the GFM and its impact on the Site Atlas schedule and directed us to submit a letter requesting relief closer to the time when the GFI is due. Accordingly, this request for schedule relief is submitted.

If you have any questions, please contact Ardyth Simmons at (505) 665-3935 (asimmons@lanl.gov) or Nancy Werdel at (505) 665-3619 (nwerdel@doeal.gov).

Sincerely,

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

Sincerely,

Nancy Werdel

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

MG/DG/PH/AS:sm

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