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Date: AUG 09 2010
Refer To: EP2010-0355



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

Subject: Submittal of the Response to the Approval with Direction for the Completion Report for Intermediate Aquifer R-47i

Dear Mr. Bearzi:

The New Mexico Environment Department's (NMED's) Approval with Direction letter on the R-47i Well Completion Report dated July 2, 2010, requires that Los Alamos National Laboratory (the Laboratory) perform a reliability assessment for well R-47i. NMED requires the Laboratory to submit a work plan by August 9, 2010, that describes the set of activities and methodologies necessary to assess representativeness of groundwater samples collected from R-47i.

Michael Dale of your staff indicated on July 14, 2010, that a letter was sufficient to communicate the Laboratory's proposal for a path forward to assess the R-47i data. It was agreed that because only two rounds of analytical data are currently available for R-47i, an assessment of data representativeness would not be appropriate at this time. The current schedule under the Interim Facility-Wide Groundwater Monitoring Plan (IFGMP) has R-47i being sampled in September and December 2010 and again in late March of 2011. These additional rounds of sampling will be beneficial in the assessment of reliability.

To further bolster the data set for the data reliability assessment, the Laboratory proposes to modify the routine sampling protocol at R-47i by extending the purge to six casing volumes (CVs) instead of the typical 3 CVs during the September 2010 sampling event. The Laboratory will collect a time series of samples during the purging phase and analyze the samples at 2, 4, and 6 CVs for general chemistry, cations and anions, and alkalinity at the Laboratory's Geochemistry and Geomaterials Research Laboratory, in addition to the suite specified in the 2010 IFGMP at the 6-CV point.

Data from the September and December 2010 sampling events should be fully validated and available for use in the R-47i data assessment by the end of February 2011. The Laboratory proposes that this assessment is consistent with the evaluation that is included in Appendix F of the annual IFGMP and that the 2011 IFGMP due to NMED on May 30, 2011, is an appropriate administrative vehicle for preparing the assessment of data from R-47i.

If you have any questions, please contact Steve Paris at (505) 606-0915 (smparis@lanl.gov) or Hai Shen at (505) 665-5046 (hshen@doeal.gov).

Sincerely,

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

Sincerely,

George J. Rael, Manager
Environmental Projects Office
Los Alamos Site Office

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