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Date: NOV 12 2010
Refer To: EP2010-0527

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

Subject: Status of Corrective Actions at Solid Waste Management Unit 36-001, Material Disposal Area AA

The purpose of this letter is to inform the New Mexico Environment Department (NMED) of the status of corrective actions at Solid Waste Management Unit (SWMU) 36-001, Material Disposal Area (MDA) AA, including the conditions encountered during initial field activities. As a result of these conditions, Los Alamos National Laboratory (the Laboratory) will be required to deviate from the remediation activities proposed for MDA AA in the NMED-approved investigation work plan for Potrillo and Fence Canyons Aggregate Area (the work plan).

As described in the work plan, the Laboratory proposed to excavate waste and debris disposed of at MDA AA. These corrective actions and subsequent confirmatory sampling results were to be reported in the Investigation Report for Potrillo and Fence Canyons Aggregate Area, due May 15, 2011. Field implementation of these activities began on Monday, November 8, 2010. As waste material was being excavated, the field crew encountered metallic debris that had much higher than expected radioactivity, as measured by field screening. Based on this discovery, field work was halted, and a review of and revision to the radiological protection requirements for this project is required. In addition, Laboratory industrial hygiene (IH) staff has identified concerns related the potential presence of beryllium at the site. This finding will require changes to the procedures for personnel protection, decontamination and release of field equipment, and waste management.

Based on the field conditions encountered and the associated health and safety issues, the Laboratory has halted field activities and will demobilize field equipment from the site. The Laboratory will implement the following actions in lieu of the activities described in the work plan:

- Project staff will meet with Laboratory radiological protection (RP), IH, and waste management staff to identify additional site characterization data needed to update worker health and safety documents and procedures.
- Project staff will prepare a summary work plan for collecting additional characterization data. This work plan will be submitted to NMED for review before it is implemented.

- The project staff will implement the work plan. It is expected that the work plan will include collection of samples from within the landfill trenches to characterize levels of beryllium and radioactivity present in buried wastes. Additional characterization work will be directed by the results of geophysical surveys that were recently completed at the site.
- Based on the new characterization data, project staff, along with RP, IH, and waste management staff, will update work procedures.
- Based on the new procedures, an updated plan and schedule for completion of the corrective actions will be prepared.

As discussed in a telephone conference with Mr. David Cobrain and Ms. Neelam Dhawan of your staff on November 10, 2010, the results of the additional characterization conducted at MDA AA, and the plan for completing remediation of the site will be presented in the investigation report.

If you have any concerns with this proposed approach or require any additional information, please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Woody Woodworth at (505) 665-5820 (lwoodworth@doeal.gov).

Sincerely,

Michael J. Graham, Associate Director
Environmental Programs
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Sincerely,

George J. Rael, Manager
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