



National Nuclear Security Administration
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Date: **SEP 28 2011**
 Refer To: EP2011-0324



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

Subject: Variance Request for White Rock Monitoring Group of the 2011 Interim Facility-Wide Groundwater Monitoring Plan

Dear Mr. Kieling:

Los Alamos National Laboratory (the Laboratory) requests a variance from the proposed scope for the White Rock Canyon monitoring group identified in the 2011 Interim Facility-Wide Groundwater Monitoring Plan (the Interim Plan). The proposed variance is to omit sampling 6 springs and 3 base-flow locations from this annual event and to sample 17 springs and 3 base flows. The monitoring group for which variance is requested is presented in Table 8.3-7 of the Interim Plan that was submitted to NMED on August 15, 2011.

The variance is requested to ensure worker safety from potential canyon flooding resulting from precipitation events that are causing flooding in tributary canyons to the Rio Grande burned by the Las Conchas fire as well as flooding potential within the Rio Grande. Historically, the Laboratory samples springs within White Rock Canyon by raft over several days, and Laboratory personnel collecting the samples camp in White Rock Canyon. However, the significantly increased potential for floods and the current condition of flood debris in Cochiti Reservoir presents safety and logistics concerns with using a water craft in the reservoir, and thus warrants cancellation of the rafting approach to sampling this year.

Instead, the Laboratory proposes to minimize the risk to workers from potential flooding concerns by accessing the White Rock Canyon springs and base-flow locations on foot, rather than by raft. Samples from springs and base-flow locations that can be collected during a nominal work day are proposed to ensure safe, timely egress from the canyon at the end of the day.

Twenty of the 29 locations presented in the Interim Plan are proposed for sampling. The specific locations to be sampled this sampling event include the following:

- Spring 1
- Spring 2
- Spring 3A

- Spring 3AA
- Spring 4
- Spring 4A
- Spring 4AA
- Spring 4B
- Spring 5
- Spring 5B
- Spring 6
- Spring 8A
- Spring 9A
- Ancho Spring
- La Mesita Spring
- Sandia Spring
- Sacred Spring
- Mortandad at Rio Grande
- Pajarito at Rio Grande
- Rio Grande at Otowi Upper

If you have 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, Assistant Manager
Environmental Projects Office
Los Alamos Site Office

MG/GR/CD/SP:vt

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
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