

**Environmental Programs**

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**National Nuclear Security Administration**

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Date: APR 12 2012

Refer To: EP2012-0027

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: Request for Withdrawal of Phase II Investigation/Remediation Work Plan for Material Disposal Area A, Solid Waste Management Unit 21-014, at Technical Area 21, Revision 1**

Dear Mr. Kieling:

The U.S. Department of Energy (DOE) and the Los Alamos National Security (LANS), LLC, request the withdrawal of the Phase II Investigation/Remediation Work Plan for Material Disposal Area A, Revision 1 (IRWP).

A corrective measures evaluation (CME) was previously submitted for Material Disposal Area (MDA) A on September 1, 2008. The New Mexico Environment Department (NMED) issued a notice of disapproval for the CME on January 28, 2009. A deviation from the CME process was presented to NMED in a letter dated April 16, 2009, whereby DOE and LANS would submit an IRWP in lieu of a revised CME. The IRWP, which calls for complete removal of the MDA A waste inventory, was submitted to NMED on September 30, 2009, and approved with modifications on November 13, 2009.


DOE and LANS now believe the remediation strategy presented in the IRWP may not be the most appropriate remedial alternative for MDA A. Lessons learned from the development of recent CMEs (e.g., for MDAs G, H and L) indicate that complete removal has high short-term risks and high cost impacts that should be evaluated against other balancing criteria. Additionally, factors affecting the remediation efforts at MDA B (e.g., removal of twice the estimated waste volume) should also be considered in the development of the complete removal scenario. Finally, DOE and LANS acknowledge potential data gaps may exist in the overall characterization of MDA A, and those data gaps should be addressed in order to select the most appropriate remedial alternative for MDA A.

Based on the information provided above, DOE and LANS propose developing a supplemental work plan to address data gaps identified by Los Alamos National Laboratory (the Laboratory) and NMED to support the evaluation of multiple remedies in a CME. Employing the CME


approach will ensure a balanced evaluation of the remedial alternatives, as specified in Section VII.D of the Compliance Order on Consent, and will provide justification for the selected remedy. Given DOE's and LANS's current focus on accelerating the shipment of aboveground transuranic waste from the Laboratory's Technical Area 54, Area G, to the Waste Isolation Pilot Plant and supporting the mutual goal of environmental risk reduction, DOE and LANS propose to submit the supplemental work plan by March 31, 2013.

If you have any questions, please contact John Bennett at (505) 500-5662 (jbennett@lanl.gov) or Ed Worth at (505) 606-0398 (edwin.worth@nnsa.doe.gov).

Sincerely,

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

Sincerely,

  
Peter Maggioro, Assistant Manager  
Environmental Projects Office  
Los Alamos Site Office

MG/PM/TG/DM/JB:sm

Cy: Laurie King, EPA Region 6, Dallas, TX  
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Jim Davis, NMED-Resource Protection, Santa Fe, NM (date-stamped letter emailed)  
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