


Environmental Compliance Programs Group

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National Nuclear Security Administration

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Symbol: EPC-DO: 24-049

Date: February 26, 2024

LA-UR: 24-21167

Locates Action No.: U2200542

Justin Ball, Chief
 Ground Water Quality Bureau
 New Mexico Environment Department
 Harold Runnels Building, Room N2261
 Santa Fe, NM 87502

Subject: DP-1132, Condition Number 2, Notification of Changes, Radioactive Liquid Waste Collection System Modification, Technical Area 3 Structure 16

Dear Mr. Ball:

On May 5, 2022, the New Mexico Environment Department (NMED) issued Discharge Permit DP-1132 to the U.S. Department of Energy, National Nuclear Security Administration (NNSA) and Triad National Security, LLC (Triad) for discharges of treated effluent from the Technical Area 50 Radioactive Liquid Waste Treatment Facility (RLWTF). Pursuant to Permit Condition Number 2, Notification of Changes, a written notification must be submitted to NMED for any changes to the RLWTF collection system.

Technical Area (TA) 3 Structure 16 (TA-3-16) is no longer utilized at Los Alamos National Laboratory and is scheduled to begin deactivation and decommissioning (D&D) activities in 2024. TA-3-16 is currently connected to the Radioactive Liquid Waste Collection System (RLWCS) but will be disconnected during D&D of the facility. The following actions will be completed to disconnect TA-3-16 from the RLWCS:

- The RLWCS pipe from TA-3-16 will be cut and capped between TA-3-16 and RLWCS Vault SM763.
- The RLWCS pipe upgradient of RLWCS Vault SM762 will be cut and capped. The section of pipe from this cut extending downgradient into Vault SM762 will be removed.
- The opening in SM762, where the piping will be removed, will be sealed to prevent intrusion of stormwater into the vault.

After completion of the actions detailed above, the RLWCS will then begin at Vault SM762 and extend to the TA-50 RLWTF. Attachment 1 provides the information required by DP-1132 Permit Condition Number 2, Notification of Changes. Attachment 2 provides a map of TA-3-16 depicting the modifications that will be made to the RLWCS.

Please contact Robert A. Gallegos at (505) 901-3824 or robert.gallegos@nnsa.doe.gov or Brian M. Iacona at (505) 500-6038 or biacona@lanl.gov if you have questions regarding this notification.

Sincerely,

**SARAH
HOLCOMB
(Affiliate)**

Digitally signed by
SARAH HOLCOMB
(Affiliate)
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Sarah S. Holcomb
Acting Group Leader
Environmental Compliance Programs
Triad National Security, LLC

Sincerely,

**ROBERT
GALLEGOS**

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ROBERT GALLEGOS
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Robert A. Gallegos
Permitting and Compliance Program Manager
National Nuclear Security Administration
U.S. Department of Energy

Attachment: Attachment 1 DP-1132 Permit Condition Number 2, Notification of Changes - Required Information
Attachment 2 Radioactive Liquid Waste Collection System Modification – TA-3-16 Map

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Attachment 1

DP-1132 Permit Condition Number 2, Notification of Changes - Required Information

EPC-DO: 24-049

LA-UR-24-21167

Date: February 26, 2024

DP-1132 Permit Condition Number 2, Notification of Changes – Required Information

Technical Area 3 Structure 16 Radioactive Liquid Waste Collection System Modification

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- a. **Date process change is planned to be implemented:** This work is expected to begin on or after April 1st, 2024.
- b. **Narrative of process change:** Technical Area (TA) 3 Structure 16 (TA-3-16) is no longer utilized at Los Alamos National Laboratory and is scheduled to be deactivated and decommissioned (D&D). TA-3-16 is currently connected to the Radioactive Liquid Waste Collection System (RLWCS) but will be disconnected during D&D of the facility. The following actions will be completed to disconnect TA-3-16 from the RLWCS: 1) the RLWCS pipe from TA-3-16 will be cut and capped between TA-3-16 and RLWCS Vault SM763, 2) the RLWCS pipe upgradient of RLWCS Vault SM762 will be cut and capped. The section of pipe from this cut extending downgradient into Vault SM762 will be removed, and 3) the opening in SM762, where the piping will be removed, will be sealed to prevent intrusion of stormwater into the vault. After completion of the actions detailed above, the RLWCS will then begin at Vault SM762 and extend to the TA-50 RLWTF.
- c. **Justification for making the process change:** The RLWCS modification is being completed to ensure D&D activities at TA-3-16 do not impact the RLWCS surrounding the building.
- d. **Units or components being removed from the process:** After the RLWCS modifications are completed:
- The existing RLWCS line will be cut and capped in two locations: i) between TA-3-16 and RLWCS Vault SM763 and ii) upgradient of RLWCS Vault SM762.
 - The section of pipe from the cut upgradient of RLWCS Vault SM762 extending downgradient into Vault SM762 will be removed.
 - RLWCS Vault SM763 will be taken out of service.
- e. **Units or components being incorporated into the process:** No additional units or components will be incorporated as part of this RLWCS modification.
- f. **Operational controls implemented for the change in processes:** No residual wastewater is expected to be present inside the RLWCS lines being cut and capped, however secondary containment will be utilized beneath each section of pipe being cut to prevent any releases to the environment. The RLWCS leak detection system at Vault SM762, and extending downgradient to the RLWTF, will remain operational.
- g. **Intended duration of process change:** Following the D&D of TA-3-16 a new facility may be built at this location in the future. If the new facility will contain RLW drains, then reconnection to the RLWCS will be evaluated. An estimated date of construction of the new facility is currently unknown.

Attachment 2

Radioactive Liquid Waste Collection System Modification - TA-3-16 Map

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LA-UR-24-21167

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Radioactive Liquid Waste (RLW) Collection System Modification – TA-3-16

- RLW Collection System Vault
- ✕ Approximate Cut and Cap Location
- RLW Collection System Influent Line Leaving TA-3-16
EPC-DO: 24-049



Map Number: 24-023-01
 Map Created by: Ben Sutter, JPPPO
 Map Date: February 5, 2024

State Plane Coordinate System
 New Mexico, Central Zone, US Feet
 NAD 1983 Datum