National Nuclear Security Administration

DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544

MAR 2 5 2009

Mr. J.D. Campbell
Chairman
Northern New Mexico Citizens Advisory Board
1660 Old Pecos Trail, Suite B
Santa Fe, New Mexico 87505

Dear Mr. Campbell:

The Department of Energy (DOE) in conjunction with its contractor has completed its review of the Northern New Mexico Citizens Advisory Board recommendations 2008-08 and 2008-11. The attachment provides DOE responses to each recommendation.

If you have any questions, you may contact David Gregory at (505) 667-5808, or myself at (505) 606-0397.

Sincerely,

George J. Rael
Assistant Manager
Environmental Operations

EO: 15GR006

cc: w/attachments:
H. Shen, EO, LASO
N. Werdel, EO, LASO
L. Bonds-Lopez, WES-RS, MS-991
C. Mangeng, ADEP-EP, MS-991
Records Center, LASO
Official Contract File, LASO

ATTACHMENT

Recommendation No. 2008-08 by Waste Management Committee and Environmental Monitoring and Surveillance Committee – Improve Documentation for Monitoring Wells Used for LANL Environmental Restoration and Cleanup of Legacy Wastes Consistent with Data Quality Objectives

Recommendation

The NNMCAB recommends that DOE support and encourage LANL environmental restoration division management to promote better understanding among the CAB, NMED and independent reviewers of the way that LANL ensures data quality objectives are achieved in their groundwater monitoring programs for the MDAs. This can be achieved through improved documentation, which provides the basis for specifying monitoring well design consistent with meeting required data quality objectives on a site-wide level.

Response

DOE continues supporting LANS in improving documentation to communicate to the regulator and the public about the LANL groundwater monitoring program. The objectives for new wells that are being drilled are presented in Drilling Work Plans submitted to the NMED for approval prior to installation. A companion document is prepared that lays out the rationale for final well design and is based on field data collected as part of the drilling phase. These two documents provide the DQO basis and design approach to allow the understanding of the objectives and how they are being met.

For existing wells, LANS developed well network evaluation reports for TA-54, TA-16, LA/Pueblo Canyons, Mortandad Canyon, and Sandia Canyon to ensure that monitoring network design and wells within the network are consistent with meeting required data quality objectives on an area-specific basis. The objectives for network design are consistent among the areas, but the monitoring objectives for wells vary depending on the contaminants of concern for a given area. Decisions and recommendations for rehabilitation, plugging and abandonment, and installation of new wells are derived from the process implemented in the network evaluation reports.

ATTACHMENT

Recommendation No. 2008-11 by Environmental Monitoring and Surveillance Committee – Reducing the Outfall into Sandia Canyon, Relating to Studies and Cleanup of Chromium

Recommendation

1. As an interim measure, reduce the amount of outfall into Sandia Canyon so that the amount is sufficient to keep the existing wetland area viable. LANL is to determine the amount of needed water.

Response
LANS preliminary evaluations show that the majority of chromium remaining in the wetland is trivalent chromium and is maintained in the trivalent form in a reducing environment. In Sandia Canyon this reducing environment is in part attributable to discharge from the outfall. Trivalent chromium is less mobile in the environment and does not pose an environment impact at this time. The potential impact of the amount of outfall into Sandia Canyon on chromium mobility is being assessed. The results and recommendations will be included in the Sandia Canyon Investigation Report due August 31, 2009.

2. Continue to study the effects on stored Cr3 and Cr6 if the wetland is not maintained.

Response
Laboratory and field studies of the effect on hexavalent and trivalent chromium remaining in the wetland are ongoing.

3. Divert the excess of the outfall to beneficial uses.

Response
Non-discharged water will be diverted for beneficial uses.