

**NORTHERN NEW MEXICO CITIZENS' ADVISORY BOARD (NNMCAB)
Recommendation to the Department of Energy**

No. 2008-10

**Regarding Independent Review of the MDA G Corrective Measures Evaluation
Report by DOE Office of Groundwater and Soil Remediation**

Waste Management Committee

Background

In accordance with commitments made to NMED under the Consent Order, LANL has submitted, on schedule, their report on the Corrective Measures Evaluation (CME) for MDA G at LANL. This report evaluates several options for remediation of the site, which contains mixed waste as well as some Transuranics (TRU). In order for the overall Consent Order schedule for site environmental restoration of completed cleanup by 2015 to be met, this report must be reviewed and accepted by NMED. Following NMED acceptance, work plans can be developed by LANL and approved.

Comment

MDA G is one of the more complex disposal sites for which LANL is developing corrective measures. This is due to not only the composition and historical storage of the contaminants, but to the complex geology of the plateau site and the need to understand and monitor any migration of contaminants in the soil below the site, potentially interfacing with groundwater and the underlying aquifer.

Use of the independent review for critical documents is long established in the scientific community as a necessary step to demonstrate consensus on the appropriate application of methodology, and the CME for MDA G is no exception.

The DOE Office of Groundwater and Soil Remediation has the ability to assemble independent peer review teams to perform such document reviews for studies across the DOE sites that are under the environmental restoration program. These review teams have the benefit of not only scientific expertise, but also the experience gained from a broad spectrum of reports and method applications which have been proposed at other DOE laboratory sites. Dr. Vincent Adams, Office Director of the Office of Groundwater and Soil Remediation, offered at the SSAB Chairs Meeting on September 16-17, 2008, to have his Office conduct this independent peer review of the MDA G CME Report, if requested to do so by LANL (1).

The NNMCAB requests the DOE specifically consider the following perspectives relevant to this recommendation:

1. The requested independent peer review should be conducted external to LANL, and should include members with specific expertise such as the Interstate Technology Research Council (ITRC) as well as DOE Headquarters experts.

2. The independent review should consider the information contained in, and leading up to, the Record of Decision signed by the DOE, the EPA and the Idaho Department of Environmental Quality (2) which outlines plans to remediate a waste landfill containing hazardous and transuranic waste at DOE's Idaho site in eastern Idaho.

Recommendation

The NNMCAB recommends that DOE direct LANL to submit the MDA G Corrective Measures Evaluation Report to DOE Office of Groundwater and Soil Remediation for an independent peer review of the report. A timely schedule for review completion and report issue by DOE should also be established.

Intent

The intent of this recommendation is to perform an independent and informed review of the MDA G CME which can be referenced by LANL in their discussions with NMED during the NMED acceptance review. This independent review can also provide information for the NNMCAB in our public communication interfaces explaining the methods of option assessment for MDA G and any relationships to other DOE restoration sites.

Effect

A supportive independent review by DOE will provide beneficial support for the option evaluation and recommendation contained in the MDA G CME. Other review comments from DOE can be used by LANL to strengthen the existing report if necessary.

References

1. Conversation with Dr. Vincent Adams at the SSAB Chairs Meeting on September 16, 2008 in Washington, DC
2. Record of Decision, <https://idahocleanupproject.com> with additional information in the Administrative Record for Operable Unit 7-13/-14, <http://ar.inel.gov/>