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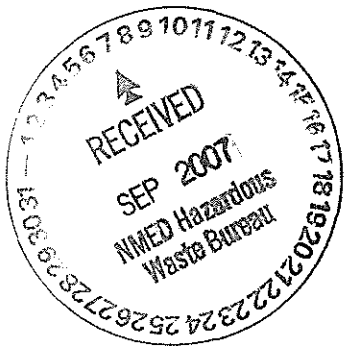


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*Date*: September 6, 2007
*Refer To*: EP2007-0437

James P. Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

**Subject: Request for Extension for the Submittal of the Delta Prime Site Aggregate Area Investigation Report at Technical Area 21 Due to Changed Conditions**

Dear Mr. Bearzi:

The purpose of this letter is to inform you of changes in site conditions encountered during the implementation of the approved investigation work plan (the work plan) for the Delta Prime (DP) Site Aggregate Area at Technical Area 21, and to request a 90-day extension of the due date for the investigation report (IR) to accommodate these changes. This request for an extension is submitted pursuant to Section III.J.2 of the Compliance Order on Consent dated March 1, 2005.

The DP Site Aggregate Area consists of 36 solid waste management units (SWMUs) and areas of concern (AOCs). As listed in Table 1.2-1 of the work plan of August 2004, these sites consist of consolidated and individual SWMUs and AOCs not associated with material disposal areas or other areas described in Sections IV or VI of the Consent Order. In general, activities detailed in the work plan were grouped into the following categories:

- Investigation – 6 sites
- Corrective Actions – 22 sites
- Deferred Actions – 8 sites

Field activities associated with the 6 investigation sites are complete, and the Los Alamos National Laboratory (LANL) is compiling this section of the IR. LANL plans to submit an IR of those sites by September 28, 2007, ahead of the November 7, 2007, submittal date. As requested by your office, the results of activities at two sites (SWMU 21-028(c) and Consolidated Unit 21-006(e)-99) will be reported in the Middle Los Alamos Aggregate Area IR. The work at the Deferred Sites is being planned in accordance with the approved work plan.

Since the initiation of field activities for the corrective action sites at the DP Site Aggregate Area in June 2006, numerous changed conditions have been encountered that have resulted in additional efforts to complete the scope required in the work plan. Because of the unique and unexpected nature of these changes, anticipating and planning for these conditions was not possible. The enclosed table summarizes the affected sites and the specific changed conditions that have occurred to date. Changed conditions are grouped into two categories as identified below:

- Field Conditions: During excavation, field crews discovered that both depth to and length of piping and drainlines were much greater than shown in the drawings. This led to unplanned trenching to locate piping and system features, identify outfall locations, resurvey sampling locations, conduct over-excavation, characterization, and disposal of additional piping (including asbestos-containing materials), and collect additional confirmatory samples. The LANL engineering and maintenance subcontractor, KSL, was remobilized to delineate and re-mark lines, and in some cases de-energize live electrical wiring. These discoveries came after thorough reviews of final as-built drawings and required immediate work stoppage. While work was halted additional exploration and mapping of utility lines was conducted to ensure safety of the workers. Each such discovery of unmapped utilities resulted in work stoppages that totaled 51 days. Much of the corrective actions field work was planned based on available engineering drawings for buildings and systems constructed over 60 years ago and whose operation ceased over 25 years ago.

- Inclement Weather: Inordinate amount of snow fall and accumulation caused delays to remove snow and reestablish sampling locations resulting in 9 days of lost time. Rate of productivity was hampered by hazards associated with working in winter conditions. Additional schedule delays have occurred as a result of high winds, rain, lightning, and saturated soil conditions.

Since we first began discussing our performance on the DP Site Aggregate Area work plan, with your staff in March of this year, we have significantly increased the magnitude of our field corrective action work force and looked at all alternatives that could be employed to recover lost schedule.

The above-referenced changed conditions have resulted in approximately 60 working days (90 calendar days) of schedule delay to date. Therefore, LANL requests an extension of 90 calendar days for submitting the IR for the corrective action sites. No reduction in scope contained in the approved IR is implied or requested. LANL proposes to submit the IR for the 6 investigation sites by September 28, 2007, and the IR for the corrective action sites by February 5, 2008.

| Change | Affected Site | Changed Conditions |
|---|---|---|
| 01 | SWMU 21-012(b) | Due to active utilities Lock Out Tag Out training was required. Pipe and tank locations were not accurately on the engineering drawings, requiring additional excavation; an asbestos pipe was discovered requiring an asbestos-trained contractor and resulting in a total of 8 additional working days. |
| 02 | SWMU 21-024(a) | Pipe and tank locations were not as shown on the engineering drawings requiring additional excavation; unmarked utilities were encountered during excavation, resulting in a total of 3 additional working days. |
| O3 | SWMU 21-024(c) | Pipe and tank locations were not as shown on the engineering drawings, requiring additional excavation and resulting in a total of 1 additional working day. |
| 04 | SWMU 21-024(g) | Unmarked communication line and removal of additional 100 ft of pipe not shown on engineering drawings resulted in a total of 8 additional working days. |
| 05 | SWMU 21-024(h) | During outfall sampling, the end of the discharge pipe was not located as shown on engineering drawings. Excavation was required to locate the end of the pipe. A total of 250 ft of piping was removed and four additional samples from two locations were collected, resulting in a total of 6 additional working days. |
| 06 | SWMU 21-024(l) | Removal of an additional 100 ft of pipe not shown on engineering drawings and six additional samples from three locations were collected, resulting in a total of 4 additional working days. |
| 07 | SWMU 21-024(j) | During outfall sampling, the end of the discharge pipe was not located as shown on engineering drawings. Excavation was required to locate the end of the pipe, resulting in a total of 3 additional working days. |
| 08 | SWMU 21-024(k) | During outfall sampling, the end of the discharge pipe was not located as shown on engineering drawings. Excavation was required to locate the end of the pipe, resulting in a total of 3 additional working days. |
| 09 | SWMU 21-024(m) | Outfall samples on the southern DP Mesa bench required high-level fall protection training and implementation, resulting in a total of 3 additional working days. Positive semivolatile organic compound results from the samples required a second sampling event, resulting in 1 additional working day. |
| 10 | SWMU 21-024(n) | During outfall sampling, the end of the discharge pipe was not located as shown on engineering drawings. Excavation was required to locate the end of the pipe, resulting in a total of 3 additional working days. |
| 11 | SWMU 21-026(a) | Piping was buried 10 ft below ground surface, 7 ft deeper than anticipated. Electrical service to the dosing siphon chamber had to be disconnected, resulting in a total of 8 additional working days. |
| 12 | All | Winter weather and snow accumulations required snow removal and maintenance at actively working sites, reestablishing sampling locations, and reduction in productivity from additional hazards associated with working in winter conditions. Additional schedule delays have occurred from high winds, rain, lightening, and muddy conditions Weather-related delays resulted in a total of 9 additional working days. |

If you have questions, please contact Mark Thacker at (505) 699-1963 (mthacker@lanl.gov), Allan Chaloupka at (505) 231-1343 (allanc@lanl.gov), or Woody Woodworth at (505) 665-5820 (lwoodworth@doeal.gov).

Sincerely,

Susan G. Stiger, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

for David R. Gregory, Project Director
Environmental Operations
Los Alamos Site Office

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Cy: (w/enc.)
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EP-TA-21 File, MS C349
RPF, MS M707
IRM-RMMSO, MS A150