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National Nuclear Security Administration
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Date: JUN 14 2010
Refer To: EP2010-0274

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

Subject: Submittal of the Response to the Approval with Modifications for the Hydrologic Testing Work Plan for Consolidated Unit 16-021(c)-99

Dear Mr. Bearzi:

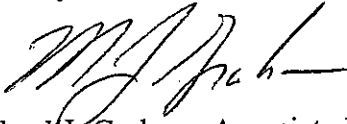
The Los Alamos National Laboratory (the Laboratory) and the U.S. Department of Energy (DOE) are in receipt of the New Mexico Environment Department's (NMED's) approval with modifications for the hydrologic testing work plan for Consolidated Unit 16-021(c)-99 (hereafter, the Plan) dated May 20, 2010.

In response to modification #2 in the May 20, 2010, letter concerning section 3.4, Tracer Test, the Laboratory proposes to defer a decision on implementing a tracer test until completion of the 24-h pump test at well R-25b and the pump test at CdV-16-4ip, both of which are described in the Plan (p.7). The basis for proposing this deferral is new information the Laboratory has obtained from recent pumping at R-25b, which generated a response in R-25, screen 2. This initial insight provides a valuable perspective on the hydrologic connection between these zones. The 24-h pumping test and the pumping test at CdV-16-4ip will further our understanding of the hydrology in the deep-perched zone at Technical Area 16 (TA-16). At this time, the Laboratory is unable to identify significant additional hydrologic information from a tracer test. Following the pump tests, if sufficient hydrologic data are not available to evaluate potential remedies for groundwater at TA-16, the implementation of a tracer test should be revisited, in consultation with NMED representatives, and a tracer test work plan will be submitted to NMED, if necessary. The Laboratory discussed deferring the tracer study with Michael Dale of your staff on Wednesday, June 2, 2010, and he indicated concurrence with this path forward. Based on the proposed pump test schedule outlined below, the Laboratory anticipates that a recommendation on implementation of a tracer test will be submitted to NMED by February 1, 2011.

In response to modification #3 concerning the schedule for the proposed pump tests, the Laboratory proposes to initiate the R-25b test in October 2010 and the CdV-16-4ip pumping test in November 2010. The latter well is scheduled to be complete by September 30, 2010.

If you have any questions please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Woody Woodworth at (505) 665-5820 (lwoodworth@doel.gov).

Sincerely,



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

Sincerely,



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

MG/DG/DM/JM/DH:sm

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