



**Environmental Programs**  
P.O. Box 1663, MS M991  
Los Alamos, New Mexico 87545  
(505) 606-2337/FAX (505) 665-1812



**National Nuclear Security Administration**  
Los Alamos Site Office, MS A316  
Environmental Restoration Program  
Los Alamos, New Mexico 87544  
(505) 667-4255/FAX (505) 606-2132

*Date:* NOVEMBER 19, 2010  
*Refer To:* EP2010-0448

James 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 of Date for Submittal of Material Disposal Area B Investigation/Remediation Report**

Dear Mr. Bearzi:

Los Alamos National Laboratory (the Laboratory) has conducted a comprehensive assessment of our excavation strategy and schedule to determine an achievable end date for remediation at Material Disposal Area (MDA) B considering progress, field conditions, and waste characteristics encountered to date. This letter requests an extension from the December 31, 2010, date for the MDA B investigation/remediation report to a new date of July 31, 2011. The requested extension takes into account delays and project challenges encountered to date as chronicled in Attachment 1.

A summary schedule to complete the remaining excavation work is provided as Attachment 2. The revised schedule was developed considering all of the additional engineering controls and operational requirements necessary to safely complete the remediation. It also incorporates average MDA B excavation rates experienced to date and impact of the pauses described in Attachment 1.

Our analysis and revised schedule to complete the project assumes that excavation work will now proceed on a five day per week/ten hour per day work schedule, and that work will not occur on holidays. Our revised schedule incorporates our strategy to excavate in multiple enclosures simultaneously as logistics allow, and accounts for anticipated project risks. This extension request also incorporates the modified excavation rates resulting from additional engineering controls and more robust operations requirements necessary to ensure the safety of workers and to protect public health and the environment.

We will continue to work with you and your staff during the execution of this project to ensure that newly identified risks are managed properly to minimize additional schedule impacts. The attached execution schedule supports completion of excavation by June 28, 2011. Our extension request for July 31, 2011, for the submission of the investigation/remediation report allows for one additional month to get confirmatory samples results and complete the report.

Our staff has been in communication with you and your staff on an ongoing basis to share with you the project challenges encountered to date. We have developed a comprehensive revised baseline plan for the remaining work at MDA B, and we are available to fully brief you if you wish.

Thank you for your consideration of this request. If you have any questions, please contact Everett Trollinger at (505) 667-0281 (etrollinger@doeal.gov) or Andy Baumer at (505) 665-0343 (andybaumer@lanl.gov).

Sincerely,



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

Sincerely,



for George J. Rael, Manager  
Environmental Projects Office  
Los Alamos Site Office

BS/ET/AB/SP:sm

Cy: Laurie King, EPA Region 6, Dallas, TX  
Tom Skibitski, NMED-OB, Santa Fe, NM  
Steve Yanicak, NMED-DOE-OB, MS M894

Bcc: Everett Trollinger, DOE-LASO, MS E550  
Arturo Duran, DOE-LASO, MS A316  
Bruce Schappell, EP-ARRA Project, MS C348  
Andy Baumer, EP-ARRA Project, MS C348  
Victoria George, EP-REG, MS M991

## ATTACHMENT 1

### REQUIRED MATERIAL DISPOSAL AREA B FIELD MODIFICATION AND OPERATIONAL CHANGES IMPACTING EXCAVATION SCHEDULE

- Significant changes occurred in field conditions. Higher radiological contaminations levels were encountered than those detected during the direct-push sampling activities.
- Two material at risk (MAR) exceedances occurred during excavation activities. On August 24, 2010, Los Alamos National Laboratory (the Laboratory) encountered an unanticipated field condition when a small object and associated soils containing approximately 10 grams of plutonium were excavated in Enclosure 1. The second MAR exceedance also occurred on October 13, 2010, in Enclosure 1. Both times the enclosure was put in a safe condition and all excavations were stopped. Approximately 2 months of downtime occurred based on these two incidents.
- The Laboratory worked with U.S. Department of Energy (DOE) Headquarters to obtain its approval of a revised facility authorization. Specifically, an exemption request under 10 Code of Federal Regulations (CFR) 830 was submitted to, and approved by, DOE Headquarters that established revised higher operating MAR levels.
- As part of this 10 CFR 830 exemption, the Laboratory was required to perform additional training and safety operational start-up reviews.
- The revised facility authorization requires additional controls on ventilation and fire suppression systems and adds limits on combustible loading.
- Excavation in Enclosure 2 is twice as deep as expected, significantly decreasing the excavation rate while increasing the excavated volume.
- The Laboratory was required to upgrade its field-monitoring instrumentation and configuration by installing FIDLERs (Field Instrument to Detect Low-Energy Radiation) on each of the excavator booms, which transmit data in real time to the control room trailer.
- The Laboratory conducted appropriate procedural changes associated with excavation. As part of the enhanced monitoring procedure, more frequent scanning and sampling are performed as waste is placed in the bins. These additional steps take more time than originally factored into the schedule.
- The Laboratory encountered two degraded drums in Enclosure 12 on October 27, 2010, containing volatile organic compounds. Work was paused to evaluate the required actions to contain the materials and ensure safety worker and public safety.
- Actual MDA-B excavation rates have averaged 36 yd<sup>3</sup> and 54 yd<sup>3</sup> per day for the mobile and fixed enclosures, respectively, versus an original planned excavation rate of 59 yd<sup>3</sup> per day for each enclosure.

**ATTACHMENT 2**

MDA-B EXCAVATION FORECAST SCHEDULE FOR REMAINING SCOPE

# MDA B – Excavation Schedule

6/30/10	7/10	8/10	9/10	10/10	11/10	12/10	01/11	02/11	03/11	04/11	05/11	06/11
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06/30/10 Enclosure 1

07/06/10 Enclosure 2

09/21/10  
Enclosure 3/4

12/20/10 –  
Enclosure 5/6

09/22/10  
Enclosure 7/8

01/11/11 Enclosure 9/10/11

09/30/10  
Enclosure 12/13

05/25/10  
Area 5