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National Nuclear Security Administration
 Los Alamos Site Office, MS A316
 Environmental Restoration Program
 Los Alamos, New Mexico 87544
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Date: AUG 08 2011
 Refer To: EP2011-0251

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

Subject: Request to Withdraw the Requirement for the Drilling Work Plans for Material Disposal Areas G and H

Dear Mr. Kieling:

The U.S. Department of Energy (DOE) and Los Alamos National Security (LANS), LLC (LANS) request that the New Mexico Environment Department (NMED) withdraw the requirement to have the drilling work plans for regional groundwater wells at Material Disposal Areas (MDAs) G and H submitted by September 16, 2011. (Note, this date reflects the recent force majeure impact notice submitted to NMED on July 21, 2011.) The work plans for the wells near MDAs G and H were required by comments in NMED's notices of disapproval (NODs) for the April 1, 2011, MDA G corrective measure evaluation (CME) report, Revision 2 and the April 15, 2011, MDA H CME Report (see Comment # 68 in MDA G and Comment # 27 in MDA H).


DOE/LANS believe it is premature for NMED to require work plans for additional wells in the revised CMEs. New hydrologic and geochemical data have been collected since the MDA G and H CMEs were submitted and NMED's issuance of the related NODs. These new data from the recently installed Technical Area 54 (TA-54) wells will be included in updated groundwater assessments that will be submitted with the revised CMEs. After reviewing these updated interpretations, NMED may determine that one or both of the wells are not necessary. Additionally, the remedies for MDAs G and H have not been selected yet, and it is possible the choice of remedy may affect the need for an additional well(s) or the location(s).

DOE/LANS agree with NMED that these proposed wells are not necessary for remedy selection and would be used for long-term monitoring after remedy implementation. In the event NMED determines in its review of the revised CMEs for MDAs G and/or H that an additional regional groundwater well(s) is needed for long-term monitoring, the work plan and installation of the new well(s) would be included as part of the corrective measures implementation plan.

If you have any questions, please contact Jarrett Rice at (505) 665-3874 (wjrice@lanl.gov) or Ed Worth at (505) 606-0398 (edwin.worth@nnsa.doe.gov).

Sincerely,

Sincerely,



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



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

MG/GR/AB/JR:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
Ed Worth, DOE-LASO, MS A316 (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
Jarrett Rice, EP-TA-54 Closure Project, MS M910 (date-stamped letter emailed)
Andy Baumer, EP-TA-54 Closure Project, MS J910 (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991 (date-stamped letter emailed)
William Alexander, EP-BPS, MS M992 (date-stamped letter emailed)
RPF, MS M707 (electronic copy)
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