



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: SEP 01 2011
 Refer To: EP2011-0302

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

Dear Mr. Kieling:

The current submittal date for the Material Disposal Area (MDA) B investigation/remediation report (hereafter, the I/R report) is September 21, 2011. The U.S. Department of Energy (DOE) and Los Alamos National Security (LANS), LLC, request an extension of this submittal date under Section III.J.1 of the Compliance Order on Consent (Consent Order) to October 31, 2011, for the reasons described below.

Current Status of Remediation

When the Progress Report for Cleanup Activities at Material Disposal Area B, Solid Waste Management Unit 21-015 at Technical Area 21, Third Quarter of Fiscal Year 2011 was submitted to the New Mexico Environment Department (NMED) in early July, the project was rapidly proceeding toward conclusion. Once operations were resumed after the Las Conchas fire, weekly rates of trench excavation and waste shipments from the site were reaching record levels, and the project was on track to meet the September 21, 2011, submittal date for the I/R report.

As noted in earlier communications, MDA B waste trench depths, widths, and waste volumes have greatly exceeded original project estimates. In fact by July, 24, 2011, 37,741 yd³ of waste had been excavated from MDA B. This precompletion waste volume was over 70% higher than original estimates for the entire project. While increases over anticipated volumes were causing impacts to the time required to safely remove and package historical buried wastes, the project mitigated schedule impacts through increased work efficiency.

Bases for the Extension Request

On July 25, 2011, a zone of elevated radioactive contamination was encountered in Enclosure 1, Row 209. This activity level was unanticipated, exceeding any encountered to date during this project. This discovery occurred within the last 35 ft remaining to be excavated in the eastern waste trench. In fact, when this area of elevated contamination was encountered, only 2% to 3% of the total MDA B waste volume remained to be excavated.

Excavation in Enclosure 1 was immediately paused in accordance with the project's stringent safety protocols. A representative sample of the waste (soil) was then collected and submitted to an off-site accredited analytical laboratory for a full-suite analysis for both chemical and radiological constituents. These data indicated that excavation rates would have to be significantly decreased to maintain the total radiological material at risk within the requirements of the DOE-regulated and -approved MDA B Facility Safety Plan.

The project estimated as much as 400 yd³ of this higher activity material may exist and that the total radiological activity in this zone could equal the cumulative total activity excavated from MDA B to date. DOE/LANS have since developed a mitigation approach that is protective of workers and the public while allowing excavation to continue in a safe and compliant manner. Work at other locations in MDA B continued.

DOE/LANS resumed Enclosure 1 excavation on August 3, 2011. Our experience through August has been that the excavation rate for this higher-activity material is less than 25% of the pre-July 25, 2011, Enclosure 1 excavation rate.

Extension Request

Based upon the current DOE/LANS estimate of the extent of this higher activity material, the reduced Enclosure 1 excavation rate will extend the primary excavation work to September 30, 2011. Remaining confirmation sampling will then be completed and data evaluated for inclusion in the I/R report. Therefore, based on these changed field conditions, DOE/LANS respectfully request an extension to submit the I/R report to October 31, 2011.

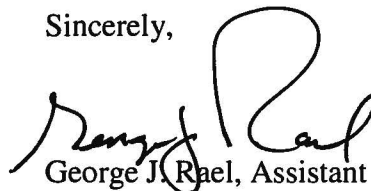
Thank you for your consideration of this request. If you have any questions, please contact Allan Chaloupka (505) 665-4858 (allanc@lanl.gov) or Everett Trollinger at (505) 667-0281 (everett.trollinger@nnsa.doe.gov).

Sincerely,



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

Sincerely,



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

MG/GR/AC: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)
Everett Trollinger, DOE-LASO, MS A316 (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
Allan Chaloupka, EP-TA-21 Closure Project, MS M992 (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)
Public Reading Room, MS M992 (hard copy)