Cross-Reference of NMED Approval with Modifications Comments to the Interim Facility-Wide Groundwater Plan for the 2014 Monitoring Year, October 2013–September 2014

NMED NOD Comment No.	Summary of NOD Comment	Section(s) in Original Report	Section(s) in Revised Report	Nature of Revision
Specific Comments				
1	Well R-61, screens 1 and 2, do not provide representative groundwater samples. Therefore, any water-quality data collected are not acceptable. Continue monitoring water level at R-61 so the hydraulic responses from pumping at nearby wells can be evaluated along with the R-61 water-level data.	Section 1.6, p. 6	Appendix E	Comment noted. Details of key actions will be presented to NMED in a separate recommendation.
2	Add Solid Waste Management Unit (SWMU) 02-005, the Omega West Reactor cooling tower and outfall, and Material Disposal Area (MDA) U to the list of primary contaminant sources for the Technical Area 21 (TA-21) monitoring group.	Section 2.2, p. 10	Section 2.2, p. 11	Both SWMU 02-005 and MDA U have been added to the list of contaminant sources for the TA-21 monitoring group.
3	The absence of tritium at R-7, screen 3, may be related to the presence of stagnant water at the Westbay screened interval rather than to the lack of contamination.	Section 2.2, p. 10	n/a*	Comment noted.
4	The Permittees' conceptual model that groundwater at R-37 screen 1 may be regional aquifer groundwater that has become disconnected does not fit the hydrologic and hydrochemical characteristics of the zone.	Section 5.2, p. 18	Section 5.2, p. 19	The sentence has been deleted.
5	The Pajarito fault zone is located west of TA-16, not east. Several graben-related faults have also been mapped in the area.	Section 6.2, p. 20	Section 6.2, p. 21	The text has been has corrected.

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6	The Permittees must increase the sampling frequency at wells R-6, R-64, and R-66 from annually to semiannually to improve the detection of contaminants beneath and downgradient of TA-21.	Table 2.4-1, p. 53	Table 2.4-1, p. 53	The sampling frequency at wells R-6, R-64, and R-66 has been increased from annually to semiannually.
7	The Permittees must increase the sampling frequency at wells R-35a, R-35b, R-44 screens 1 and 2 from semiannually to quarterly to protect water supply well PM-3 and to improve the detection of contaminants at and near the chromium plume. They must also propose the analytical suite for the additional sampling events. NMED approves the Permittees' proposal to sample R-61 screens 2 and 3 on a quarterly basis.	Table 3.4-1, pp. 55–57	Table 3.4-1, p. 54	The sampling frequency at wells R-35a, R-35b, R-44 screen 1, and R-44 screen 2 has been increased from semiannually to quarterly, and the proposed analytical suite is presented in the table.
8	The Permittees must increase the sampling frequency at wells R-55 screen 1 and R-23, located along the TA-54 boundary with Los Alamos County, from semiannually to quarterly and propose the analytical suite for the additional sampling events.	Table 5.4-1, pp. 58–59	Table 5.4-1, pp. 56–57	The sampling frequency at wells R-55 screen 1 and R-23 has been increased from semiannually to quarterly, and the proposed analytical suite is presented in the table.
9	The Permittees must increase the sampling frequency at well R-18 from semiannually to quarterly to collect additional data to refine the flow and transport of TA-16 contaminant sources and propose the analytical suite for the additional sampling events. In addition, because well CdV-R-37-2 screen 2 does not provide representative groundwater samples, the Permittees must propose an effective pumping method for this well.	Table 6.4-1, p. 60	Table 6.4-1, p. 58	The sampling frequency at well R-18 has been increased from semiannually to quarterly. In its April 25, 2014, letter, NMED directed LANL to prepare a work plan to address the issue of nonrepresentative groundwater samples at well CdV-R-37-2 screen 2. A work plan will be submitted to NMED by June 12, 2014. No samples are proposed at this well in the 2015 Interim Plan until the issue has been addressed.

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10	Annual sampling at wells R-29 and R-30 is not protective of groundwater with respect to contaminants from subsurface release at MDA AB. The Permittees must increase the sampling frequency at wells R-29 and R-30 from annually to semiannually and propose the analytical suite for the additional sampling events.	Table 7.4-1, p. 62	Table 7.4-1, p. 59	The sampling frequency at wells R-29 and R-30 has been increased from annually to semiannually, and the proposed analytical suite is presented in the table.
11	The Permittees must increase the sampling frequency at well R-10a from annually to semiannually to improve detection of chloride, perchlorate, nitrate, uranium, and other contaminants and propose the analytical suite for the additional sampling events.	Table 8.3-1, p. 64	Table 8.3-1, p. 60	The sampling frequency at wells R-10a has been increased from annually to semiannually, and the proposed analytical suite is presented in the table.
12	The Permittees must increase the sampling frequency at springs Ancho 1, 3A, 5, 5B, 6, 9, and 9A, located downgradient of TA-33 and TA-38, to annually. The additional sampling event at these springs may be reduced to volatile organic compounds, high explosive compounds, and tritium, which are contaminants of potential concern.	Table 8.3-2, pp. 67–68	Table 8.3-2, pp. 62–63	The sampling frequency at springs Ancho 1, 3A, 5, 5B, 6, 9, and 9A has been increased to annually. The analytical suite at these springs includes the contaminants of potential concern as well as major ion chemistry and radionuclides.
13	Table E-1.0-1 must include wells CdV-R-37-2, R-12 screen 2, R-16 screen 4, R-43 screen 2 and R-62. In addition the perched zone at R-12 screen 2 requires additional purging to produce representative samples.	Appendix E, pp. E-5–E-7	Appendix E	These wells have been included in the watch list along with proposed actions on a well-by-well basis.

*n/a = Not applicable.