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## NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN  
Secretary  
BUTCH TONGATE  
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### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 30, 2015

Doug Hintze, Manager  
U.S. Department of Energy  
EM-Los Alamos Field Office, DOE  
3747 West Jemez Road  
Los Alamos, NM 87544

Michael T. Brandt, Associate Director  
Environment, Safety, Health  
Los Alamos National Laboratory  
P.O. Box 1663, MS K491  
Los Alamos, NM 87545



**RE: REVIEW**  
**DERIVATION AND USE OF RADIONUCLIDE SCREENING ACTION LEVELS,**  
**REVISION 4, SEPTEMBER 28, 2015**  
**EPA ID #NM0890010515**  
**HWB-LANL-15-047**

Dear Messrs. Hintze and Brandt:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *Derivation and Use of Radionuclide Screening Action Levels*, Revision 4 dated September 28, 2015 and referenced by ADESH-15-133/LAUR-15-24859. NMED has reviewed the document and provides the following comment.

The Permittees must follow the DOE Order 458.1 and apply As Low As Reasonably Achievable (ALARA) principles, as previously stated in the NMED's Review letter (February 26, 2015) for *Derivation and Use of Radionuclide Screening Action Levels, Revision 3*. While the use of a 25 mrem/yr dose limit does result in less conservative radiological screening action levels, Section 4 of Revision 4 specifically states that "if the analysis determines the dose is not ALARA, additional remediation is warranted to lower the dose further or an alternative scenario may be used to restrict activity and land use for that property, if transferred." The application of ALARA should ensure that adequate evaluation and assessment of risk is conducted and provide for flexibility in requiring additional actions and/or controls on sites to be released for public use. The approach as presented for calculated radiological screening levels is acceptable.

Messrs. Hintze and Brandt  
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Please contact Neelam Dhawan at (505) 476-6042, if you have any questions.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
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File: 2015 LANL, Radionuclide SALs Rev 4(LANL-15-047)