



Department of Energy
National Nuclear Security Administration
Los Alamos Field Office
Los Alamos, New Mexico 87544



NOV 08 2018

ESHID-603301

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environmental Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Dear Mr. Kieling:

Subject: Request for Extension of Time to Supplemental Environmental Project (SEP)
Independent External Triennial Review Corrective Actions

On September 14, 2018, the U.S. Department of Energy (DOE) National Nuclear Security Administration (NNSA) received the report titled *Supplemental Environmental Project: Independent External Triennial Review* by Parsons Enterprise Construction Management Services pursuant to the January 22, 2016 Settlement Agreement between the National Nuclear Security Administration (NNSA) and New Mexico Environment Department (NMED). As part of the Settlement Agreement:

“NMED agrees to refrain from taking any enforcement action against the Respondents, their constituent agencies, contractors and affiliates for any potential regulatory violations, or operational deficiencies, that could lead to potential environmental regulatory violations identified in the triennial reviews so long as the Respondents and their facility operators correct any deficiencies identified in the course of such reviews within sixty (60) calendar days of the finalization of each triennial review report, or for good cause shown, within another period of time beyond sixty (60) calendar days, if approved by NMED.”

The Settlement Agreement requires all open potential regulatory deficiencies that were identified within the final report to be corrected by November 13, 2018.

For the reasons set forth below, the DOE respectfully requests a 60-day extension of time until January 12, 2019 to further evaluate the potential regulatory deficiencies and determine corrective actions:

1. Contract transition from Los Alamos National Security, LLC (LANS) to Triad National Security, LLC (Triad) took place on November 1, 2018. To facilitate appropriate and comprehensive support, Triad leadership involvement is needed through the evaluation process and corrective action planning for the potential regulatory deficiencies.

2. The potential regulatory deficiencies within the final report require additional time for coordination between Triad and Newport News Nuclear BWXT–Los Alamos, LLC (N3B), collectively the Permittees, as corrective actions impact both Permittees.
3. Engagement of NMED for corrective actions that require regulatory process external to DOE/NNSA.

If you have comments/questions or would like to meet regarding this submittal please contact Mr. Peter Maggiore at (505) 665-5025 or at Peter.Maggiore@nnsa.doe.gov.

A handwritten signature in black ink that reads "Peter Maggiore". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Peter Maggiore
Deputy Assistant Manager

cc:

Neelam Dhawan, NMED-HWB

John Kieling, NMED-HWB

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Records Center, NA-LA

Official Contract File, NA-LA

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