

**From:** Owens, Kirk W.  
**Sent:** Wednesday, December 14, 2005 8:01 PM  
**To:** Antizzo, Karen B.; Gorden, Milton E.; Roles, Gary W.  
**Cc:** Sanford, Peter  
**Subject:** FW: SWEIS Comments

**Attachments:** ICN2QP-3.5PeerReviewCommentForm 12-6-05a Appendix I.doc; PeerReviewCommentForm Appendix H.doc

**Kirk Owens**

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(301) 601-5611 (voice)  
(301) 428-0145 (fax)

-----Original Message-----

**From:** hth@lanl.gov [mailto:hth@lanl.gov]  
**Sent:** Wednesday, December 14, 2005 5:33 PM  
**To:** ewithers@doeal.gov  
**Cc:** kirk.w.owens@saic.com; isaacson@lanl.gov; sradz@lanl.gov; dfarley@lanl.gov; 'Ron Rager'  
**Subject:** FW: SWEIS Comments

Attached are SWEIS comments from Ron Rager. Mostly relevant to TA-21 investigations and remediation.

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**From:** Ron Rager [mailto:rrager@lanl.gov]  
**Sent:** Tuesday, December 13, 2005 4:23 PM  
**To:** 'Todd Haagenstad'  
**Subject:** SWEIS Comments

Here's my comments

Ronald E. Rager  
ENV-ECR  
Phone: 505-665-4065  
Fax: 505-667-5801  
Mail Stop: M992

## Peer Review Comment Form

**Part 1** (Author or Peer Review (PR) Coordinator Complete)

Date: \_\_\_\_\_

Title: SWIES Appendix I Rev. #: \_\_\_ Doc. Catalog No: ER200 - \_\_\_\_\_

Reviewer's Name (Print): Ron Rager Organization: ENV-ECR Comments due by: \_\_\_\_\_ (Date)

Author: ENV-ECO Phone: \_\_\_\_\_ E-Mail: \_\_\_\_\_

Return forms to PR Coordinator: Todd Haagenstad Phone: \_\_\_\_\_ E-Mail: \_\_\_\_\_

**Part 2** (Reviewer Completes)

Date Received: \_\_\_\_\_ Date Review Completed: \_\_\_\_\_

Signature & Date: \_\_\_\_\_

**Part 3** (If under time constraints, the Author completes.)

Not all comments resolved; attach PR Comment Form to Document Signature Form.

Signature & Date: \_\_\_\_\_

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
1	MDA Appx. General	Transport to and from TA 21 should recognize the need/use of the proposed new access road regardless of D&D.			

<sup>1</sup>page, section #, paragraph/line      <sup>2</sup>A = accept / R = reject

## Peer-Review Comment Form

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
2	same	Because of limited access, to TA 21 and the high-volume truck traffic to and from TA 21 for the capping and removal options, a staging area for waste handling and storage area for clean material should be included in the assessment. These areas would need to go at the east end of the mesa top – thus the entire mesa top is subject to disturbance during remediation. Trucks at 7-minute intervals is unrealistic and should be no closer than 10 minute intervals. Pre-staging of fill on the mesa is required to achieve the lower truck traffic interval. A new haul road on to the mesa is required (can be the same one used for D&D).			
3	line 511-525	The MDA A Work plan is approved.			
4	line 3512-3520	Removal and relocation of the perimeter road is required. Also there are electrical poles to be removed			

<sup>1</sup>page, paragraph, line

<sup>2</sup>A = accept / R = reject

## Peer-Review Comment Form

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
5	line 3512	Correct the Gas pipeline diameter to 6" – per KSL u/i			
6	3756-3768	Grout should be assumed a 2-step operation. Grout the sludge (heel) then use clean grout to fill the void. This will increase the nCi/g to larger values (potentially at or near the 100n/Ci/g threshold.			
7	3774-3787	Where did the 10% assumption come from? Historical data indicates 5-6" of remaining product. This calculates to about 1.5% of the tank volume, making the Ci estimates unconservative.			
8	4101-4115	What is the basis for the assumption that part of the tank will be below TRU? Is this conservative?			

<sup>1</sup>page, paragraph, line

<sup>2</sup>A = accept / R = reject

## Peer-Review Comment Form

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
9	3194-3199	Adding soil over vegetation without stripping of topsoil/roots is not an acceptable engineering practice.			
10	3734ff	The General's Tanks remediation requires pre-remediation work beyond drilling boreholes in soil. The tanks must have the atmosphere stabilized, the sludge sampled, criticality assessed, the sludge mixed and sampled in large enough quantity for bench scale grout mix formulation. This requires Two additional DSA's. The SWEIS should address these additional efforts.			
11	Table I-1	The MDA T description is not correct. Under the Order it is a consolidated SWMU 21-016(a)-99 and includes other areas/facility.			
12	Table I-2	Update Table with approved work plans and new Order dates.			

<sup>1</sup>page, paragraph, line

<sup>2</sup>A = accept / R = reject

## Peer-Review Comment Form

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
13	Lines 777-904	See comment on consolidate SWMU of MDA T. Add other areas such as former building 21-036, and 21-257 w/ associated structures - below grade.			
14	3801	Clarify that the 20% number represents the entire mesa top from MDA B on the west to the end of the mesa on the east – and revise percentage to include the entire mesa top including previously undisturbed areas.			
15	Table I-56	Footnote "a" is incorrect. The definition of TRU does not depend on burial status. If left in place, it will still be TRU.			
16	4152-4155	Additional routes for waste shipments must be recognized. TA-21 waste shipments using 502 eastbound with appropriate controls should be allowed. The impacts could potentially be different from those discussed and it is unclear if those presented are the bounding case.			

<sup>1</sup>page, paragraph, line

<sup>2</sup>A = accept / R = reject

## Peer-Review Comment Form

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
11	5187	Containment structures over MDA U are not going to be used for final removal so the assessment is not bounding. It is erroneous to assume that material would be exhumed at a rate to exceed any regulatory requirement.			
12	5368	See comment 2 on pre-staging fill.			

<sup>1</sup>page, paragraph, line

<sup>2</sup>A = accept / R = reject

## Attachment B: Peer Review Comment Form

**Part 1** (Author or Peer Review (PR) Coordinator Complete)

Date: 11/17/05\_\_\_\_\_

Title: SWEIS – Appendix H Rev. #: \_\_\_ Doc. Catalog No: \_\_\_\_\_

Reviewer's Name (Print): \_\_\_\_\_ Organization: \_\_\_\_\_ Comments due by: 12/15/05 (Date)

Author: ENV-ECO Phone: \_\_\_\_\_ E-Mail: \_\_\_\_\_

Return forms to PR Coordinator: Todd Haagenstad Phone: \_\_\_\_\_ E-Mail: \_\_\_\_\_

**Part 2** (Reviewer Completes)

Date Received: \_\_\_\_\_ Date Review Completed: \_\_\_\_\_

Signature & Date (to be signed ONLY upon agreement of comment resolution): \_\_\_\_\_ Date: \_\_\_\_\_

**Part 3** (If under time constraints, the Author and Reviewer each sign.)  Not all comments resolved; attach PR Comment Form to Document Signature Form.

Author Signature & Date: \_\_\_\_\_

Reviewer Signature & Date: \_\_\_\_\_

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
1	Line 972	App. 1 line 3530 says TA-21 covers 260 acres.			

<sup>1</sup>page, section #, paragraph/line    <sup>2</sup>A = accept / R = reject



## Attachment B: Peer-Review Comment Form

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
2	General	Verify consistency between the land transfer discussion in Appendix I and Appendix H.			
3	Figure H-1 & line 1169	The figure does not show building 21-001 discussed in the text. Note this building no longer exists and should be removed from the text.			
4	1200	The SWMU referred to near 21-286 is listed as NFA and not part of the Consent Order. Neither is 21-286 slab part of the Consent Order			
5	1213	DP East was initially used for polonium 210 initiator research and did not handle transuranic atoms. Other research was non-nuclear dealing with coatings, etc. until the tritium mission started – see LANL historic buildings report.			

<sup>1</sup>page, paragraph, line

<sup>2</sup>A = accept / R = reject

## Attachment B: Peer-Review Comment Form

Comment #	Location <sup>1</sup>	Reviewer's Comment/Suggestion	A/R <sup>2</sup>	Author's Proposed Revision/Resolution	Final Resolution
6	Figure H-6	The land transfer dates are incorrect. For example A-15 parcel is being transferred in 2005. Others are also incorrect. Contact Maryjoe Keys (LANL).			
7	1342-43	The area directly affected must include the entire mesa top from the end of the mesa on the east to MDA B on the west plus canyon areas for the access road. contractor facilities are required. A waste management area is required to load and ship waste. Also a clean soil stockpile area is required to accept incoming and excavated clean soils.			
8	General	There is no mention of the fill across DP Canyon. Please add.			

<sup>1</sup>page, paragraph, line

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