

**From:** Owens, Kirk W.  
**Sent:** Thursday, December 15, 2005 7:38 PM  
**To:** Roles, Gary W.  
**Subject:** FW: LANL SWEIS Specific Comments

**Attachments:** RHull LANL SWEIS Comments 11-28-05.doc

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

**From:** RHull@LATA.com [mailto:RHull@LATA.com]

**Sent:** Thursday, December 15, 2005 5:24 AM

**To:** 'Owens, Kirk W.'

**Cc:** 'Mitchell S. Goldberg'; 'Todd Haagenstad'; 'Withers, Elizabeth'; 'John Isaacson'; Kennicott Mike

**Subject:** LANL SWEIS Specific Comments

Kirk - as I mentioned on the phone I was held up trying to get the material we discussed on our telecom. So here are my specific comments. Many were discussed during Monday's meeting. Please call if you have any questions. I didn't have time to clear them through the ENV-ECR folks but they are copied on this and can tell us whether I am full of it or not. Thanks for both the hard work to prepare the draft and for allowing us to provide input and comments. Regards, Bob

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**Specific Comments on the LANL SWEIS Version 11/28/05**

1. General – Don't forget to remove the explicit references/citations to the CATEX's such as that on pg. 2-31 which provides accession numbers etc.
2. General – Don't forget to search the document to find those "completed within 2005" references like the one on page 2-38.
3. General – I don't see NEST, BEST, or the plane being flown by the threat reduction folks (talk with Ron Dolin) mentioned anywhere. It seems that post 9-11 that their activities have either become operational or increased substantially.
4. General – Don't forget to change the references to the ER program by the new name of Environmental Remediation and Surveillance Program.
5. Pg. 1-12/13 The description of the No Action Alternative is still confusing. The No Action is the 1999 Expanded Alternative plus the post-1999 SWEIS NEPA reviews (e.g., CATEX's, EA's, various types of EIS's including SA's, SEIS's, and PEIS's, and the corresponding FONSI's or ROD's). Not all of these NEPA actions were necessarily LANL-specific NEPA actions (e.g., DOE or NNSA programmatic EIS's). I'm also concerned that it won't be apparent to the public that the Consent Order compliance must be adhered to for all alternatives. I believe it was mentioned in Monday's meeting that we could somehow note that in any event the ROD would have to select actions related to complying with the Consent Order.
6. Pg. 1-17 Line 525: This sentence essentially says that all operations at TA-21 will cease. It has been postulated that some LANL ENV-ECR functions that will support the DMA investigations and cleanup and the TA-21 DD&D activities may move into the currently LANL Ecology Building at TA-21. This sentence may be too restrictive.
7. Pg. 1-17 Line 533: This sentence talks about the transfer of land. I didn't notice anywhere that the SWEIS document cited the "Cross-Cut Guidance on Environmental Requirements for DOE Real Property Transfers" (DOE/EH-413/9712, Revised March 2005) or 40 CFR Part 373.
8. Pg. 1-18 Line 565: This section describes new construction projects. I'd like to see the SWEIS mention the "proposed" TA-21 land bridge. There has been some engineering analysis of slope, quantities of materials, etc. [Ron Raeger is preparing this information] and there was some discussion about this in the cumulative effects. The land bridge does appear to be on the critical path for all the DP-Mesa/TA-21 MDA and DD&D work.
9. Pg. 2-12 Fig. 2-2: Need to check this figure to ensure that land transfer actions are subtracted from the LANL footprint. For example, it looks like the tract at White Rock has not been subtracted. The LANL boundary there does not fall on Hwy 4 anymore. Also the sliver of land at the "Y" located at the far upper right where it shows the "502" sign I think has been transferred to the San Ildefonso Pueblo. Anyway – just check to make sure the boundaries are correct.
10. Pg. 2-13 Tab 2-2: Under the row for TA-2 it states that "ancillary structures have been demolished." Whatever happened to the fuel rod storage in the canyon wall? I seem to recall that is still there.
11. Pg. 2-13 Tab 2-2: Under TA-8 the word "24-megaelectronvolt" shouldn't be pluralized.
12. Pg. 2-14 Tab 2-2: Under the row of TA-21 it sounds like there are currently two active Tritium research facilities. I believe there is only one active facility. This box also doesn't show the current office space utilized by the Ecology group and some other

- maintenance functions. There is also no mention of the current MDA investigation and cleanup activities.
13. Pg. 2-18 Sec. 2.4: This section describes the proportion of doses and risk attributed to the key facilities from radioactive materials and chemicals. No mention is made of biological risk. TA-43 has most if not all of the biological risk from LANL actions.
  14. Pg. 2-19 Fig. 2-3: This figure still shows TA-43 as HRL. I believe this was renamed as the Biosciences Facility. HRL is only one of the functions at this site.
  15. Pg. 2-20 Line 514: This section describes the nuclear and radiological facility designation but doesn't explicitly reference the newly designated "Nuclear Environmental Sites" (NES) which includes several of the MDA's rather it references the PRS's in the table.
  16. Pg. 2-22 Tab 2-3: It appears that many of the cells in this table are not complete. For example the MSL and Target Fab facilities have no entries. Blank cells that shouldn't have information in them should probably be shaded to show that there is no intention for information to be in them. Also it is hard to distinguish between a Key Facility and a Nuclear Facility. This is important in later parts of the SWEIS.
  17. Pg. 2-24 Tab 2-3: Under the entry for the Potential Release Sites it lists the TA's and over at the right it shows the facility or structure, but they aren't tied together. It would be good to show the facility and its TA location in the facility column. Also note that the footnote identifies PRS as "Project Reporting System" and not "Potential Release Site" as it should.
  18. Pg. 2-31 Line 789: The term "dosimetrically insignificant amounts (microcuries)" is probably not a generally understood term by the public and should be re-worded.
  19. Pg. 2-38 Line 996: States that this activity is to happen in 2005. This statement should be updated.
  20. Pg. 2-44 Line 1191-94: The statement about BSL levels currently in use should be clarified. Only BSL-1 and -2 levels are currently used. The BSL-3 level is only proposed.
  21. Pg. 2-45 Line 1238: This references "living things" such as microbes and viruses. There may not be consensus on this but viruses and microbes such as viruses, viroid, virusites, and prions do not meet the definition of "living" rather they consist of genetic material or fragments of genetic material and proteins. Maybe nobody cares about this comment except me. See also Table 3-13 pg. 3-35.
  22. Pg. 2-45 Line 1240-45: There are several terms used here that are not commonly understood such as, proteomics and metabolomics. I suggest removing these terms and using other language. See also Table 3-13 pg. 3-36. See also pg. 3-38 use of term biomimetic surfaces.
  23. Pg. 2-46 Line 1259-1281: This section makes no mention of biohazardous or medical waste.
  24. Pg. 2-59 Line 1731: This line states there are no HAZ CAT 2 or 3 facilities among the non-key facilities. What about MDA's or PRS's? Does this conflict with what is shown on table 2-3 [see comment 15].
  25. Pg. 2-61 Line 1835-38: This sentence doesn't make sense as written.
  26. Pg. 2-66 Line 1988-91: This statement seems unfounded. Up to this point in the document and later on (ppg. 2-72, 2-73 [Ecology – Assessment], 2-75 [Worker Health – Assessment], 2-77 [Waste Management – Actual Changes], etc.) there are many

- statements that say that 1999 SWEIS projections were exceeded. I think you need to state this differently.
27. Pg. 2-67 Tab 2-5: Under land resources it describes area covered in terms of acres and hectares. Earlier in the document it is in terms of square miles and kilometers. It is better to use the same numbers and units throughout so as not to confuse the reader.
  28. Pg. 2-67 Tab 2-5: Under the Visual Resources entry it states that “new construction has reduced visually incompatible building styles.” The new AD building is an imposing feature on the horizon that was not there previously – it can easily be seen from downtown. You could not see the old AD building. It is also very “futuristic” and is not consistent with other architecture in TA-3.
  29. Pg. 2-68 Tab 2-5: Under Geology and Soils I suggest (and Elizabeth concurred) removing the paragraph about the BSL-3 facility.
  30. Pg. 2-71 Tab 2-5: Under “Groundwater Water Use” I suggest removing Elizabeth Keating’s name unless you are citing an actual personal communication which should be in the reference list.
  31. Pg. 2-72 Tab 2-5: Under “Groundwater – Quality” I’d complete the entry and remove the reference to Charlie Nylander unless it is going to be an actual personal communication reference.
  32. Pg. 3-3 Tab 3-1: Under Material Disposal Area it shows remediation of MDA H in accordance with the Consent Order but no others are mentioned for the no action alternative. This needs to be consistent with the earlier statement about what is in the No Action Alternative and Expanded.
  33. Pg. 3-37 Line 931-34: This states that work is approved by internal and external bodies. It only mentions internal bodies. What are the external bodies that approve this work?
  34. Pg. 3-50 Tab 3-17: The first two rows don’t seem to show anything with regard to remediation or DD&D waste. Is it here and I can’t see it? While ENV may not use this facility for characterization, packaging, and labeling or transport, receipt, acceptance we need to keep the options open.
  35. Pg. 3-60 Line 462: This paragraph starts to mention the remediation alternatives. I think we need to scrub this use and use (as Elizabeth stated) “options.” Otherwise it sounds like the SWEIS has two other alternative actions. See also Pg. 3-70 Line 1857.
  36. Pg. 3-71 Line 1900: This sentence refers to a new seismic study but there is no reference. This is an important issue. Somewhere in this document this should be mentioned in more detail as to what is to be accomplished. A member of the public might want to know what will result from this effort.
  37. Pg. 3-72 Line 1941-43: This statement is contrary to the concept that administrative and engineering controls will be used to insure that members of the public and the environment will be protected. This is not to say that an accident could produce an exposure but the way this is written suggests that normal operations could produce that effect.
  38. Pg. 3-76 Line 2107: This is the first place I can find where Pantex is mentioned in regards to radioactive waste. Talking about WIPP, NTS, Utah, West Texas and LANL for disposal sites is OK – Pantex is not.
  39. Pg. 3-77 Line 2118: This states all the low-level rad will go to NTS and all the major MDA’s would be exhumed. Neither statement may be correct – need to ask ENV folks about this.

40. Pg. 3-77 Line 2153-56: At this point I haven't seen any mention of mixed-waste. It would be expected that the MDA cleanup actions would produce mixed waste.
41. Pg. 3-78: This section on Facility Accidents talks about the maximum seismic event producing a lethal dose to the MEI but it doesn't say where that is or if the impact is significant enough that those beyond the MEI are also affected by increased cancer risk etc. Also there is discussion about radiological accident risk and chemical accident risk but nothing about biological accident risk. With existing BSL-2 capability handling Select Agents is there any appreciable biological risk?
42. Pg. 3-79 Tab 3-19: General – The first column is all LANL Site so is it necessary? The first row “Land Use” under Expanded Operations Alternative mentions the removal and capping alternatives again. Need to scrub.
43. Pg. 3-83 Tab 3-19: See footnote “b” which states temporary or one-time dose to the public from cleanup of MDA's. This is an off-hand statement that if important should be in the text. I would repeat that normal operation should not produce this effect – only an accident would produce this effect.
44. Pg. 3-87 Tab 3-19: Under Transportation; Worker Radiation Exposure; Expanded Operations – it would seem that drivers should not receive this dose even collectively. That is because the packaging will be in accordance with DOT requirements and therefore even sitting upon the containers for the whole duration would not yield a dose higher than that received by receiving the normal environmental dose. They would receive a bigger dose by driving up to our elevation.
45. Pg. 3-89 Tab 3-19: Under Accident Risk; Wildfire – Chemical; No Action. The conversion between feet and meters is incorrect. If the feet is 427 then the meters should be 130 not 180.
46. Pg. 3-104: This whole page refers to the Capping and Removal Alternatives – which should be options. Also – the last paragraph should be where we talk about the DIF Staging Area and the Waste Processing Facility for the TA-21 remediation and DD&D activities [provided earlier today by Todd].
47. Pg. D-2 Tab D-1: The title refers to the Supplement Analysis – now the new SWEIS. There is no mention of any MDA assessment except MDA-G but this is a rad accident. What about chemical accidents at MDA-B? See the respective Work Plans to see chemical lists. See also Pg. D-18 and statement on Pg. D-21 Line 196. We need to demonstrate that chemical accidents were evaluated for the MDA's particularly MDA-B due to its close proximity to the public.
48. Pg. G-59 Tab G-17: This shows the name Envirocare as does Tab G-18. I would use a generic Utah or West Texas in lieu of mentioning this facility. I'd search the document for reference to Envirocare or other facility (like Pantex).
49. Attachment H1: This seems to be incomplete – I only have a partial. The table of contents shows “error”.
50. Pg. I-5 Tab I-3: The reference to MDA-V should be scrubbed because that action has already taken place. Note the footnote refers to a CATEX by reference number.
51. Pg. I-5 Line 116-7: This refers to screening action levels. We don't know what constraints will be place on cleanup by NMED. SAL's are pretty much a LANL thing.
52. Pg. I-6 Line 140: This states that no extensive CM actions are conducted for major PRS's. This statement is a problem for MDA-B.

53. Pg. I-6 Sec. I.1.1.1: This discusses “Alternatives” – this section needs to be edited to change the description to “options.”
54. Pg. I-8 Sec. I.1.1.2: This section does not mention the land transfer constraints I mentioned earlier [Cross-Cut Guidance on Environmental Requirements for DOE Real Property Transfers” (DOE/EH-413/9712, Revised March 2005) or 40 CFR Part 373].
55. Pg. I-11 Sec. 2.2: Shouldn’t this be “Environmental Remediation and Surveillance Program”? See also Line 302-303.
56. Pg. I-13 Sec. I.2.2.2: Is this the location where it should be explained that any ROD for this SWEIS whether it be the No Action or other alternative will select compliance with the Consent Order as a selected activity?
57. Pg. I-123 Sec. I.3.3: This section on remediation of the MDA’s is fairly comprehensive but I looked through it and I don’t see mentioned the use of, for example, coffins for containment of compressed gas cylinders awaiting sampling and disposal, treatment of compressed gases that cannot be transferred to another container and can’t be transported on highways, hot-tapping of compressed gas cylinders, excavation and removal of explosives (either intentional explosives like PETN or unintentional explosives like crystallized picric acid), etc. In other words I think that some of the high-hazard operations that could produce accidents and potential exposures to the public or the environment are not discussed even though the potential is described in the historical presentation.
58. Pg. I-135 Sec. I.3.3.1.2.2: This section needs to add treatment and disposal options for inorganic and organic chemical gases or vapors. Many gases cannot be repackaged and must be treated or released to the atmosphere. We need to discuss this more. It may be that this is a section where we discuss the DIF Staging Facility, DP Mesa Field Laboratory, and the DP-Mesa Waste Processing Facility (information provided earlier today). Don’t forget the Mixed-Waste component from the MDA cleanup and characterization (I do see it mentioned in I-137)!
59. Pg. I-135 Sec. I.3.3.1.2.2.1: This section discusses the on-site disposal capacity. There is a good likelihood that the amount of construction debris and other solid non-hazardous material will need to go somewhere else besides the local landfill. I don’t see any other options mentioned.
60. Pg. I-136 Sec. I.3.3.1.2.2.2: This section is good with one caveat. There is an implication that these are our options. It should be made clear that these are some of the options that could be used.
61. Pg. I-196 Sec. I.3.3.2.6: This section is also pretty good, however, it reads like this is what we are going to do. For example, on Line 5412 it says that airlocks would be used for movement of personnel etc. This isn’t necessarily the case for MDA-B and all MDA’s may not use enclosures. I think it is important to re-state that any approach has to go through review and approval by DOE/NNSA and NMED. This and following sections reflect options that could be used to perform this work. This discussion of fabric domes is actually a few years old and doesn’t reflect the newest experience in materials and how quickly they can be set up (note line 4543 says it could cause delays – this isn’t necessarily true).
62. Pg. I-196 Line 4544: This line states that MDA are frequently at depths of 60 ft or deeper. MDA-B is nothing like that. This generalization is too loose and needs to reflect

- that some MDA disposal depths are as little as 12 ft (get an accurate depth from someone in the ENV office).
63. Pg. I-197 Line 4544-52: This entire paragraph is problematic as it offers some opinions about the efficacy of certain options. I don't think that is in the purview of the SWEIS and I don't concur with its conclusions.
  64. Pg. I-198 Sec. I.3.3.2.7: This section should discuss the DIF Staging Facility, the DP-Mesa Waste Processing Facility, and perhaps the DP-Mesa Field Laboratory that would be used for characterization for disposal/manifesting etc.
  65. Pg. I-198 Sec. I.3.3.2.8: While this section is good I think that the detailed discussion of the phases of the work should be removed in lieu of something a little less detailed. This discussion sounds like this is what we are going to do. In fact, we are now planning the activities and it may not go like this at all. For example, Phase 2 will not likely be like it shows as Phase 2a, 2b, and 2c. I'd also remove figure I-25 since the logic may change.
  66. Pg. I-202 Line 4634: I'm not sure that the value of 24,000 cubic yards is still correct. I also don't see mention of the amount of clean soil needed to fill the trenches in after removal of the waste.
  67. Pg. I-208 Tab I-69: Note the mention of Envirocare – should replace this with Utah. Where is our West Texas option?
  68. Pg. I-209 Tab I-70: This table is for the No Action Alternative which doesn't include the removal activity for MDA-B. Even though we say that the ROD will select compliance with the Consent Order this doesn't reflect the amount of material that should be included. Same comment for Table I-73 on page I-213.
  69. Pg. I-209 Line 4793: Here is another mention of the Capping "Alternative." Also see following pages and Tables I-71 and I-72.
  70. Pg. I-224 Sec. I.3.3.5.6: Scrub this and following sections for use of the term Alternative versus option.
  71. Pg. I-227: This page addresses the RESRAD calculations for the various scenarios for the MDA's. I don't see a comparable analysis for chemical releases although I may have missed it.
  72. General – I don't see any mention of the Postal Facility on DP Road. Perhaps discussing this as some type of distribution facility (and not specifically Postal Service) would work. This is a cumulative impact issue due to the truck traffic and transportation accident concern.