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NATIONAL LABORATORY
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Environmental Protection Division
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Los Alamos, New Mexico 87545
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Date: January 28, 2008
Refer To: ENV-RCRA-08-021

Ms. Rebecca Kay
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Dear Ms. Kay:

**SUBJECT: LOS ALAMOS NATIONAL LABORATORY SITE TREATMENT PLAN
(STP) MIXED TRU WASTE TRACKING**

In an October 5, 2007 letter from James Bearzi, Bureau Chief of the New Mexico Environment Department (NMED), the Los Alamos National Laboratory (LANL) was notified of seven deficiencies in the March 13, 2007 FY06 Site Treatment Plan annual update. LANL provided responses to six of the NMED comments in a letter dated November 13, 2007. The seventh NMED comment required submittal of a plan by December 31, 2007 to improve tracking of mixed TRU (MTRU) waste covered in the LANL STP. NMED extended the deadline for submittal of the plan to February 1, 2008. Specifically, NMED requested the following:

"The information provided throughout the year for mixed low-level waste (MLLW) is significantly more detailed, traceable, and verifiable than the transuranic waste (TRU) inventory information. The Respondent's diligence in sending "Notices of Completion of Off-Site Shipment", "Completion of Milestone Activity", and "Request for Expedited Treatment" letters to the Department for MLLW throughout the year facilitates the Department's accounting of newly generated and shipped waste at the Facility. However, for TRU waste, scant information is provided to NMED regarding quantities remaining on-site from previous fiscal years, newly generated TRU waste, and waste shipped to the Waste Isolation Pilot Plant (WIPP). This issue has been the subject of many discussions between NMED and the Respondents, but to date, the Respondent's have moderately addressed it.

The Respondents must devise a plan to address this issue. The plan must be submitted to NMED for review approval no later than December 31, 2007. NMED requires improvements to the tracking system this federal fiscal year for TRU waste at the Facility. NMED also requires a table, similar to that of the MLLW inventory, to be submitted in the FY07 STP, Revision 18.0 for the Facility's TRU waste."

LANL offers the following in response to the two NMED requests listed above.

1.) LANL Information Management personnel have revised the database tracking of MTRU STP covered waste. These changes will allow more detailed information on MTRU waste to be provided in the FY08 STP. LANL proposes to continue with the use of treatability codes to categorize covered waste reported in the STP instead of the 1995 Transuranic Waste Baseline Report (TWBR) identification numbers in the STP. The 1995 TWBR identification numbers are antiquated and are no longer used in the DOE complex. MTRU container records include a treatability code; since the STP has historically used treatability codes, LANL proposes to continue using this method of reporting.

NMED indicated that scant information is provided by LANL throughout the year on STP MTRU waste shipped to WIPP. LANL suggests that it would be redundant to submit Notices of Completion of Off-Site Shipment (i.e., copies of shipping manifests) for MTRU waste as it does for mixed low-level (MLL) waste for two reasons. First, because MLL waste is sent for treatment to several different facilities located outside of the state of New Mexico, NMED does not have routine access to the records of the out-of-state hazardous waste treatment facilities and cannot independently verify receipt of waste shipments. Hence it is necessary for LANL to provide NMED with timely copies of shipment manifests for MLL STP waste. However, all of LANL's MTRU STP waste is shipped to WIPP. It is our understanding NMED has online access to the WIPP Waste Information System (WWIS) and to information on LANL waste shipment dates, waste volumes, manifest numbers, container numbers, etc. The submittal of manifests would appear to be redundant to information obtainable through WWIS. In addition, LANL waste shipments to WIPP occur 2 to 3 times per week; each shipment with a separate manifest. The routine submittal (which would most likely be weekly) of paper copies of STP MTRU waste shipping manifests to NMED along with transmittal letters and certifications would be burdensome for both LANL and NMED, given NMED's access to the information through WWIS.

2.) As requested, the FY07 STP Background Volume Table 2.2-2 "Estimated Covered MTRU Inventory by Treatability Group" will be reformatted to contain information similar to that reported in the STP Background Volume MLL Inventory Waste Table 2.2-1, i.e., ship dates and volumes for each treatability group, newly generated waste volumes, etc. The table will provide NMED information on MTRU STP covered waste volumes remaining on-site from previous fiscal years, newly generated MTRU STP covered waste, and MTRU STP waste shipped to WIPP.

LANL will implement the proposed system before the end of the current fiscal year if NMED approves. This system as proposed should provide detailed, traceable, and verifiable information on the MTRU inventory in the STP.

Ms. Rebecca Kay
ENV-RCRA-08-021

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January 28, 2008

Please contact me at (505) 667-4715 or by email at dyea@lanl.gov if you have any questions.

Sincerely,



Albert Dye
STP Project Manager

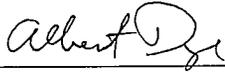
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Gene Turner, LASO/EO, A316
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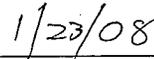
**ENCLOSURE
CERTIFICATION**

**LOS ALAMOS NATIONAL LABORATORY SITE TREATMENT PLAN (STP)
MIXED TRU WASTE TRACKING**

I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



Albert Dye
STP Project Manager
Water Quality & RCRA
Los Alamos National Laboratory
Operator



Date Signed