

DEPARTMENT OF ENERGY
 Environmental Management Los Alamos Field Office (EM-LA)
 Los Alamos, New Mexico 87544

Mr. John E. Kieling
 Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303



APR 08 2019

Dear Mr. Kieling:

Subject: Response to Comments on the Biennial Inspection and Maintenance Report on Erosion Controls in Drainages to the 90s Line Pond at Technical Area 16

This letter is being submitted in response to the New Mexico Environment Department's (NMED's) letter dated March 7, 2019, "Review and Comments, Biennial Inspection and Maintenance Report on Erosion Controls in Drainages to the 90s Line Pond, Consolidated Unit 16-008(a)-99 at TA-16" (HWB-LANL-18-065). NMED provided two comments on the "Biennial Inspection and Maintenance Report on Erosion Controls in Drainages to the 90s Line Pond at Technical Area 16" submitted by the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) on December 17, 2018.

NMED's first comment states "The DOE provided the documentation for the 2018 inspection (e.g., photos) but did not include any documentation for the September 1, 2017 inspection in the Report. The DOE is required to perform annual inspections (see NMED Approval Letter dated December 30, 2016), and provide documentation of each annual inspection. The DOE must either provide additional documentation of the 2017 inspection, or provide justification for not documenting the 2017 year's inspection."

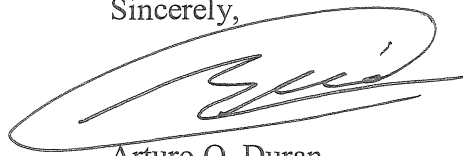
In response to the comment, in September 2017, Los Alamos National Security, LLC, staff performed a visual inspection only, and no inspection record was prepared. The photos taken during this visual inspection appear to have been lost during transition between contractors and thus cannot be provided. No follow-up maintenance activities resulted from either the September 2017 or the November 2018 inspections, which identified no damage to run-on controls that prevent the migration of contamination to the 90s Line Pond. As such, N3B is confident that the 2017 visual inspection was adequate in determining that the controls were in good operating condition and that the area drainages continue to be in stable condition. N3B has implemented tracking mechanisms to ensure that photographs and inspection documentation are recorded and available annually going forward.

NMED's second comment states "In the photos taken on November 29, 2018, snow is visible and partially obstructing the visual inspection of vegetation and control structures at TA-16-007(a)-99. NMED recommends that future visual inspection be performed when the view of vegetation and controls is not obstructed by snow."

Because of the persistence of snow at the site, DOE is unable to update the figures at this time but will implement NMED's recommendation that future visual inspections be conducted under conditions where the view of vegetation and controls is not obstructed by snow. Additionally, DOE will ensure photographs for each inspection year are included in future biennial inspection and maintenance reports on erosion controls within drainages to the 90s Line Pond at Technical Area 16.

If you have any questions, please contact Steve Veenis at (505) 309-1362 (steve.veenis@em-la.doe.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@em.doe.gov).

Sincerely,



Arturo Q. Duran
Compliance and Permitting Manager
Environmental Management
Los Alamos Field Office

cc (letter and enclosure[s] emailed):

L. King, EPA Region 6, Dallas, TX
N. Dhawan, NMED
S. Yanicak, NMED
D. Carlson, N3B
E. Evered, N3B
J. Legare, N3B
F. Lockhart, N3B
G. Morgan, N3B
B. Robinson, N3B
S. Veenis, N3B
A. White, N3B
A. Duran, EM-LA
D. Nickless, EM-LA
D. Rhodes, EM-LA
C. Rodriguez, EM-LA
emla.docs@em.doe.gov
N3B Records
Public Reading Room (EPRR)
PRS Website

EM-LA-40AD-00420