



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

EMLA-2020-1583-02-001

September 3, 2020

Mr. Kevin Pierard
Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313

Subject: Response to the Review, Monitoring Year 2019 Annual Periodic Monitoring Report for the Technical Area 21 Monitoring Group, Los Alamos Canyon Watershed, February 2020, Dated August 4, 2020

Dear Mr. Pierard:

The U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) are providing responses to the comments in the New Mexico Environment Department's "Review, Monitoring Year 2019 Annual Periodic Monitoring Report for the Technical Area 21 Monitoring Group, Los Alamos Canyon Watershed, February 2020," dated August 4, 2020.

These comment responses are submitted in accordance with Section XXIII(E) of the June 2016 Compliance Order on Consent, as modified on February 27, 2017.

If you have any questions, please contact Steve Veenis at (505) 309-1362 (steve.veen@em-la.doe.gov) or Hai Shen at (505) 257-7943 (hai.shen@em.doe.gov).

Sincerely,

Arturo Duran

Digitally signed by Arturo
Duran
Date: 2020.09.01 07:06:07
-06'00'

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

CC (letter and enclosure[s] emailed):

Laurie King, EPA Region 6, Dallas, TX
Raymond Martinez, San Ildefonso Pueblo, NM
Dino Chavarria, Santa Clara Pueblo, NM
Richard Carpenter, City of Santa Fe, NM
Harry Burgess, Los Alamos County, NM
Jack Richardson, Los Alamos County, NM
Chris Catechis, NMED-DOE-OB
Steve Yanicak, NMED-DOE-OB
Michelle Hunter, NMED-GWQB
William Alexander, N3B
Emily Day, N3B
Zoe Duran, N3B
David Fellenz, N3B
Cheryl Fountain, N3B
Jeff Holland, N3B
Danny Katzman, N3B
Kim Lebak, N3B
Joseph Legare, N3B
Dana Lindsay, N3B
Pamela Maestas, N3B
Glenn Morgan, N3B
Joseph Murdock, N3B
Dan Pastor, N3B
Bruce Robinson, N3B
Steve Veenis, N3B
M. Lee Bishop, EM-LA
Stephen Hoffman, EM-LA
Kirk D. Lachman, EM-LA
David Nickless, EM-LA
Cheryl Rodriguez, EM-LA
Hai Shen, EM-LA
Ben Underwood, EM-LA
emla.docs@em.doe.gov
n3brecords@em-la.doe.gov
Public Reading Room (EPRR)
PRS website

Pamela T. Maestas

From: Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>
Sent: Tuesday, September 8, 2020 2:11 PM
To: Pamela T. Maestas
Subject: RE: Submittal to NMED on 9/3/2020 of TA-21 PMR Comment Response

Received..
Thank you.

From: Pamela T. Maestas <pamela.maestas@em-la.doe.gov>
Sent: Thursday, September 3, 2020 4:16 PM
To: Pierard, Kevin, NMENV <Kevin.Pierard@state.nm.us>
Cc: Dhawan, Neelam, NMENV <neelam.dhawan@state.nm.us>; Emily M. Day <Emily.Day@em-la.doe.gov>; Regulatory Documentation <RegDocs@EM-LA.DOE.GOV>; Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>; cheryl.rodriquez@em.doe.gov; Cheryl W. Fountain <Cheryl.Fountain@EM-LA.DOE.GOV>
Subject: [EXT] Submittal to NMED on 9/3/2020 of TA-21 PMR Comment Response

Mr. Pierard,

Attached for submittal is a pdf of the following:

- Response to the Review, Monitoring Year 2019 Annual Periodic Monitoring Report for the Technical Area 21 Monitoring Group, Los Alamos Canyon Watershed, February 2020, Dated August 4, 2020 (EMLA-2020-1583-02-001, letter and enclosure)

Please acknowledge receipt of this submittal by responding to this email.

Let me know if you have any questions.

Thank you.

Pamela T. Maestas

Regulatory Documentation Manager

Newport News Nuclear BWXT-Los Alamos, LLC

c. 505-927-7882

regdocs@em-la.doe.gov



1200 Trinity Drive, Suite 150
Los Alamos, NM 87544

**Response to the Review, Monitoring Year 2019 Annual Periodic Monitoring Report for the
Technical Area 21 Monitoring Group, Los Alamos Canyon Watershed, February 2020,
Los Alamos National Laboratory (LANL), EPA ID #NM0890010515, HWB-LANL-20-010,
Dated August 4, 2020**

INTRODUCTION

To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments are included verbatim. The U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office responses follow each NMED comment. All information associated with analyses of radionuclides is voluntarily provided to NMED in accordance with DOE policy.

COMMENTS

NMED Comment

1. *Results for low-level tritium at Wells R-9, TA-53i and R-66 are not reported in Table C-1 or Table C-2 in Appendix C. The MY2019 IFGMP proposed annual sampling for this constituent for all three wells in MY2019 and the previous annual periodic monitoring report provided the result for low-level tritium from MY2018. Deviations regarding low-level tritium sampling were not provided for these wells in Table 2.1-1 of the Report. Please provide the results or provide an explanation for why the results are not provided in the Report.*

DOE Response

1. Well R-9 was sampled for low-level tritium on September 16, 2019. Well TA-53i was sampled for low-level tritium on September 18, 2019. Well R-66 was sampled for low-level tritium on September 12, 2019. Low-level tritium results for R-9, TA-53i, and R-66 were incorrectly coded as "screening" for the analytical laboratory's quality control (QC) reporting option, and therefore not included as part of the periodic monitoring report.

The laboratory's QC reporting option has been corrected to "standard." Appendix C will be revised to include the low-level tritium results as part of Revision 1 of the periodic monitoring report.