



Certified Mail- Return Receipt Requested

March 15, 2023

Arturo Duran
U.S. Department of Energy
Environmental Management
Los Alamos Field Office
1200 Trinity Drive, Suite 400
Los Alamos, NM 87544

**RE: REVIEW 2022 ANNUAL PERIODIC MONITORING REPORTS FOR THE GENERAL SURVEILLANCE MONITORING GROUP: LOS ALAMOS AND PUEBLO CANYON, MORTANDAD AND SANDIA CANYON, WATER CANYON/CAÑON DE VALLE, ANCHO CANYON, WHITE ROCK CANYON, AND PAJARITO CANYON WATERSHEDS
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
LANL-22-090**

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the U.S. Department of Energy (DOE), National Nuclear Security Administration (NA-LA) and the Office of Environmental Management (EM-LA) Los Alamos field offices, Newport News Nuclear BWXT-Los Alamos, LLC (N3B) and Triad National Security, LLC (Triad) (collectively the Permittees') *2022 Annual Periodic Monitoring Report For The General Surveillance Monitoring Group: Los Alamos and Pueblo Canyon, Mortandad and Sandia Canyon, Water Canyon/Cañon de Valle, Ancho Canyon, White Rock Canyon, And Pajarito Canyon Watersheds (Report)*, dated and received November 29, 2022, and referenced by EM2022-0747.

NMED has completed its review, and has the following comments:

1. Section 2.1 PME Observations and Deviations from Planned Scope, page 6:

Additional details in this Section need to be provided. Provide detailed descriptions of the types of deviations, causes, and any steps taken to prevent re-occurrence. It is not sufficient to simply reference Table 2.1-1, (see comments related to Table 2.0-1 below).

2. Section 6.3 Data Gaps, page 14:

Additional details need to be provided. Provide detailed descriptions of the types of data gaps, causes, and any steps taken to prevent re-occurrence. It is not sufficient to simply reference Table 2.1-1, also see comments related to Table 2.0-1 below.

3. Table 2.0-1 General Surveillance Monitoring Group Locations and General Information, page 27:

NMED notes an inconsistency between the screen depths reported for R-19 screen 3 in quarter 1 (85-41 ft depth), and the depths reported for the same R-19 screen 3 in quarter 3 (1171.4-1215.4 ft depth). Additionally, NMED notes that the screen depth reported for R-19 screen 3, quarter 1 of Table 2.0-1 is not consistent with the depths reported in subsequent Tables in Appendices A, B, or C of the Report. Please review and make appropriate revisions. In addition, add a footnote for the "sample collection date" column title that references Section 4.4 (Groundwater Elevations).

4. Table 2.1-1 Description Column, page 30:

The Permittee's statement "flow rate not collected" is not sufficient and the cause of this data gap must be fully described in Sections 2.1-1 and Section 6.3, along with a proposed solution to prevent re-occurrence.

5. Table 2.1-1 Comment Column, pages 29-32:

- a. The Permittee's statement "Canceled because site was dry" is not sufficient, the Permittee must provide a rationale of possible causes for the site being dry and must also propose alternative sampling plans or new locations to address this issue in the future.
- b. The statement "insufficient water for sampling" does not describe the amount of water collected, and if a partial prioritized analysis was or was not possible with the volume of water available. Revise the statement to provide adequate detail.
- c. The statement "water level in sump" is not sufficiently descriptive and must be expanded upon in Section 2.1-1 to provide the amount of water in the sump and the rationale for why this justified canceling sample collection.
- d. The statement "Sampled per Attachment 14 of the groundwater SOP" must be revised in Section 2.1-1 or in another section of the Report, as applicable, to include a description of the sampling performed. A reference to LANL's internal standard operating procedure is not sufficient.

A revised Report must be provided within 30-days from the receipt of this letter. The Permittees must provide two physical copies, as well as an electronic copy.

Arturo Duran

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Should you have any questions or comments, please contact Siona Briley at (505) 690-5160.

Sincerely,

Rick Shean

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Rick Shean

Division Director

Resource Protection Division

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