

COMMENTS ON SNL/NM LTS PLAN
NMED DOE OB
8/10/01

In general, the document does not present a plan to conduct LTES. It repeats the reasons to do stewardship that have appeared in other stewardship related documents including the task group reports. Suggest providing action steps to accomplish task group recommendations rather than simply repeating them. For example, begin the monitoring section with the current activities (Sec 2.5), and propose how those might look under LTS (Secs 2.6 & 2.7). The plan should be written in a manner of "What's in place, and here's what we will do. (implementation oriented)"

It appears that SNL may need to return to square one and produce a completely revised LTS plan. This plan should be based on a basic strawman format such as that utilized at the recent Grand Junction LTS workshop and incorporating task group recommendations. Specifically:

- I. Purpose and scope of LTS plan, state problem, scope, and objectives.
- II. Stewards and/or stakeholders with roles and responsibilities
- III. Nature of the LTS plan. Specifically, a GIS based environmental management system which incorporates geographic modeling and analysis, graphic capabilities to demonstrate the conceptual basis for LTS monitoring, data base capabilities, text/data archiving, LTS programmatic detail, and public accessibility
- IV. Physical site setting. Site and other functional boundaries, stewardship unit locations, types of units, etc.
- V. Site operational history, including photos, ownership, remedial actions
- VI. Regulatory framework or requirements
- VII. LTS components
 - a. Land use planning
 - b. Institutional controls
 - c. Engineered systems
 - d. Surveillance activities
 - e. Corrective action and contingency planning
- VIII. Information management system
 - a. GIS based graphic site model
 - b. Information and records management
- IX. Physical surveillance program
 - a. Deeds and records maintenance
 - b. Site inspections
 - c. etc
- X. Environmental monitoring program specific to SWMUs, areas, watersheds, etc by media. [Suggest using the organization found in the report to Congress as a basis for the monitoring program (i.e., engineered units, signed and fenced, etc).]
 - a. Groundwater
 - b. Surface water
 - c. Soil
 - d. Air
 - e. Biota
- XI. Project control, including costs, funding, schedules.
- XII. Community involvement

The revised plan may include a programmatic plan based on the above outline and an implementation plan, which specifies in detail what parts of the plan are in place and what needs to be done. With a programmatic commitment to LTS the plan can evolve, which is not conveyed in the current document. For example: "Terrestrial Surveillance is currently performed by taking samples of vegetation, soil, etc at XX selected sites on and around KAFB. This will continue under LTES with the addition of sampling locations near selected signed and fenced SWMUs."

Miscellaneous items:

- KAFB/SNL Stewardship integration is a requirement, not a possibility
- LTS needs to be developed and incorporated into current ER decision making, this is not a pass off program after ER is done.
- Plan must demonstrate the multi-layer, multi-agency, redundant planning that is required to assure long term effectiveness.
- The institutional controls section rather well done. It should describe the current land management system currently used by Sandia and DOE. Then state actions to be taken to coordinate this with local government systems.
- The Radioactive Waste Landfill should be included in the "Signed and Fenced Units" category for monitoring and institutional controls purposes.

ROBERT LONG, JR.
MEMBER, LONG TERM STEWARDSHIP MANAGEMENT TASK GROUP

In comparison with the DOE LTS Plan Guidance Draft, the following seem to be omitted and should be included in SNL's plan:

(3.0) Why is long term stewardship required?

- Expand history of operations
- Site descriptions; Where are the Class III modification volumes referenced?

A schedule of planned activities is needed, eg. Draft Guidance Section 8:

- When will LTES Plan be revised?
- When will MWL plan be reevaluated?

Section 6.3, funding, does not address the issue appropriately. What are SNL's plans for funding LTES? (Issue 16 belongs here.) How will the issues be resolved?

Section 7: What are plans for FUTURE public involvement?

What are plans for emergency response, corrective actions, contingency plans? (Section 4.6 of Draft Guidance)

Need statement of roles and responsibilities for LTESS (Draft Guidance 9.0, 10.1+)

Include "IMS" in Section 1.6 and/or 8.0

Why include ISSUES in the Draft? The LTES Plan should just provide the answers, not questions.

I recommend following the LTSP Guidance more closely, especially the next version of that document. The Draft version seemed to be pretty good at the LTS Workshop in Grand Junction.

Section 5.3: Omit "Advice from these stakeholders..." Simply state what your plan is, not what was suggested. (This applies throughout the document.)

- Another example page 5-2, Section 5.3 - "After the ER Project is complete" Not needed since that's when LTES begins.
- In same sentence: "SNL/NM will most likely place LTES responsibilities...": Need to be definitive here, recognizing that the plan will be revised to reflect changes.
- Simply state that LTES will be the responsibility of its Laboratories Services Organization (or an organization to be determined.)

Why not start LTES when each site is closed, rather than waiting until ALL sites are closed?

DEB THRALL
MEMBER, LONG TERM STEWARDSHIP MANAGEMENT TASK GROUP

You may recall that my most immediate concern at the last public meeting was that the outreach portion of this plan not be postponed until later. I feel that it is of utmost importance that the public be involved with this initiative from the absolute beginning. There is no way that a proposal of this magnitude in terms of the time and commitment that it will take from not only the laboratory but also the community, will be successful if we do not include all the stakeholders in the planning, initiation and implementation stage. I would like to formally reiterate my position that outreach not only be included in the preliminary report, but that it be given a prominent position in the plan. This should be emphasized by you who will carry this forward to Washington. Thank you.

TED TRUSKE
MEMBER, INSTITUTIONAL CONTROLS AND INFORMATION MANAGEMENT TASK
GROUP AND LONG TERM STEWARDSHIP MANAGEMENT TASK GROUP

Reading the draft LTES report and reflecting on past discussions I'm still convinced that the likelihood of funding for cleanup and stewardship will always be low priority to DOE HQs. Cleanup etc. is not central to the core mission/charter of DOE. In addition it is not really the kind of work that most DOE staff hire on to do.

An option is to have another, or a special agency responsible for cleanup etc. In addition to the raft of problems in creating such an organization, the fact that DOE has the data and the resources, plus the historic responsibility means that DOE would have to have major participation in a kind of "service provider" role to support the agency with the funding responsibility. These realities are compounded by the sad reality that cleanup will never be foremost in the concerns of most citizens, and as a result not a major concern to the Congress and various Congressional offices.

I don't see any prospect of things getting better, especially with the Bush administration posture on environmental issues. I suppose I am just disheartened that we have these issues, just picking at the scab of "if only things had been done differently by the AEC/DOE in the past." It does not help that the same thoughts of things could be better "if only" come to mind about government and the world in general.

DENISE BLEAKLY
MEMBER, TECHNICAL STAFF AT SANDIA NATIONAL LABORATORIES
CHAIR, INSTITUTIONAL CONTROLS AND INFORMATION MANAGEMENT TASK
GROUP

1. Upon review of Table A-1 in the Appendix A. ER Sites 55 (Red Towers Site) and 87 (Bldg. 9990 Firing Site) are large areas with surface Du contamination.

These sites are risked-based sites. However, there was no discussion anywhere in the document about how or when these sites would be monitored for surface Rad contamination. Likewise, there was no discussion about if the risk levels were exceeded for Du what type of clean-up activities would be undertaken.

2. I am very concerned that sites like these will fall through the cracks and not be monitored adequately.

ROGER KENNETT
HEAD OF THE DOE OVERSIGHT BUREAU AT SANDIA NATIONAL
LABORATORIES
MEMBER, LONG TERM STEWARDSHIP MANAGEMENT TASK GROUP

1. Use the Issues Boxes to do a gap-analysis i.e. what do we have in place that comes close, what we plan to do to close gap, and what is out of our control.
2. The use of the word "should" makes the document sound like previous ones like DOE's "LTS Study". Using more active words like "we will have a program to periodically evaluate changes in soil concentrations".
3. Follow site groupings from NDAA report to describe escalating monitoring needs. (The Info. Mgmt. Section uses it)

CRAIG RICHARDS
MEMBER, INSTITUTIONAL CONTROLS AND INFORMATION MANAGEMENT
TASK GROUP AND LONG TERM STEWARDSHIP MANAGEMENT TASK GROUP

As a resident of Albuquerque, and a member of two of the LTES working groups, this brief note contains my reaction to the draft plan dated August 2001. The draft plan shows the results of many months of hard work by ABQ citizens, DOE officials, and SNL program managers/staff. The August 2001 draft plan represents a very good start for the LTES program. However, I am very concerned that the LTES program may now be headed in the wrong direction. In general, my concern focuses on the public participation/input part of the LTES program.

Specifically, I believe the LTES draft plan needs to be changed as follows:

1. Move/incorporate the task groups' reports (content) up into the appropriate sections of the draft plan (rather than be appendices), and then show in each section how it responds to the task group's concerns/suggestions/values.
2. Explicitly and officially state in the report that DOE & SNL are committed to working with the interested members of the public as equal partners in every aspect/discussion/decision of the LTES program as it unfolds in the future.
3. Clearly and unequivocally declare in the report that DOE & SNL have abandoned the "business as usual" approach that stresses easy administration/oversight with "to do" and "punch lists" and they have replaced it with a programmatic approach that emphasizes innovative, practical, common sense choices/solutions over time that fully incorporate public values and concerns as they (and their public partners) spend all their time/energy focused on the legacy wastes (SWMUs) and protecting our environment.

My comments respond to the contents and structure of the draft LTES plan that looks like DOE doing business as it has always done with the public input viewed as a necessary process ("the olde way") on a "to do" checklist that needs to be done and checked off. In the past the "olde way" of doing business has resulted in public opposition, lengthy delays, and costly budget overruns for projects such as WIPP/TRUPAC and many others. The public and their concerns were viewed as obstacles to sound science and program management.

The LTES program to be truly successful needs locally designed solutions to whatever the future may present at the SWMUs -- it does not need to have bureaucratic constraints dictated by DOE HQ in Washington, DC. The LTES program needs to step outside its "bureaucratic comfort zone" and to step towards meaningful, purposeful public involvement in all aspects/choices of the program. The LTES program can serve as an innovative "pilot program" that proves citizen partners can facilitate public involvement/acceptance for the program's decisions & actions that implement local community values/concerns and proven technologies in a timely manner ("the new way" of doing DOE business).

JOANNE RAMPONI
MEMBER, LONG TERM STEWARDSHIP MANAGEMENT TASK GROUP

I do want it known how very concerned I am that the Public Outreach is not mentioned more strongly. I realize that in the light of Tuesday (September 11, 2001) everything is relevant. I know that the secrets, etc. are not to be public knowledge, but a little bit of truth in what we are doing with the waste won't hurt.

KIM ONG
RETIRED HYDROLOGIST AND MEMBER, LONG TERM STEWARDSHIP
MONITORING TASK GROUP

May I offer the comments below as a former member of the DOE/SNL Citizens' Advisory Board (1998-2000) and a member of the LTES Citizens' Task Group on Environmental Monitoring during the task group's initial deliberations?

I am impressed with the entire LTES Plan and at how quickly this draft was produced. I commend the different task groups and the DOE/SNL staff that contributed to this successful effort. It is my understanding that this plan will be revised and expanded upon as more information is gathered while the ER program is completed at SNL during the next six to seven years.

Including "environmental" in LTES helps to distinguish it from other stewardship programs. May I suggest that the LTES Plan emphasize periodic reviews such as every 5 or 10 years to consider options for further clean up, for excavation or removal of hazardous materials, or the need for LTES at sites because of natural attenuation of hazardous materials?

It may be more reasonable and practical for the LTES plan to set a LTES goal onto a foreseeable future, possibly 100 years. After this time has elapsed, the LTES Plan then should be replaced with a new plan, decisions, or actions based upon the availability of developed technologies for handling wastes, economically and safely, better knowledge and understanding of environmental conditions, and based upon any local stakeholders changed values or needs for the sites.

I am pleased that the LTES Plan addressed monitoring of contaminants through the vadose zone. This effort is needed to assess potential contamination to the deep aquifer by volatile organic compounds and to evaluate strategies for extraction of the VOCs from the vadose zone. I suggest that the LTES Plan include scientific geochemical research of contaminant movement through the vadose zone because this process is not adequately understood.



Community Resources Information Office

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January 8, 2004

Michael Zamorski
KAO/Department of Energy
P.O. Box 5400, MS-0184
Albuquerque, NM 87185-0184

Re: Sandia National Laboratories – 30 "No Further Action" Proposals
Comment Period April 29, 2001 to June 29, 2001

Dear Mr. Zamorski:

This letter contains public comments and a general concern for the thirty (30) "No Further Action" (NFA) site proposals presented at the Sandia National Laboratories' (SNL) poster session on May 15, 2001. This letter is based on public group discussions of the individual site proposals. During this review, we used the Community Resources Information Office (CRIO) and its resources. We request a written response to our concern through the CRIO. Also, we request that this letter and any previous Citizens' Advisory Board NFA letters become part of the Long-Term Environmental Stewardship (LTES) report and the CRIO web site for future awareness of all comments and concerns.

As private citizens living in the Albuquerque area, the Community NFA Work Group (CNWG) members became comfortable with the NFA proposals, primarily for two reasons. First, the CNWG reviewed all 30 proposals for (among other things):

- History of Site,
- Completeness of Data and Constituents of Concern,
- Nature and Extent of Site Characterization, and
- Reasonableness of Risk Assessment and Projected Land Use.

Second, the Class III Permit Modification (C3PM) Process was an iterative process that involved independent oversight by the New Mexico Environment Department (NMED). The CNWG members completed their review during four public meetings using poster session information, information binders (Statement of Basis) for each site, and the group members' personal knowledge and expertise. In addition, CNWG members had follow-up discussions with SNL task leaders. The following sections of this letter present the CNWG's consensus recommendation for the NFA site proposals and our general concern with all of the NFA proposals. See Enclosure A for the list of sites.

Results in Brief

In summary, the CNWG was able to develop qualified support for all 30 NFA proposals. However, CNWG support for these proposals must be caveated with a general concern because they contained projected land uses and some data and/or risk uncertainties.

Concern – Future Uncertainties

The CNWG review of these 30 NFA proposals, as a practical matter, worked with projected land uses as key assumptions and with varying levels of data and/or risk uncertainties. We are comfortable with these NFA proposals as presented. However, our expectation is that the Long-Term Environmental Stewardship program will be an enduring process, which will ensure current and projected land uses occur as planned. Further, we expect that any future changes in deed restrictions and known hazards for each site would be handled through the Stewardship process with Public/Community/NMED oversight. Our support diminishes for any NFA proposal if future funding and staffing is reduced for Stewardship and/or NMED.

Respectfully submitted,

Craig D. Richards, Group Leader
Community NFA Work Group

cc: Beth Oms, DOE
James Bearzi, NMED
Will Moats, NMED
Peter Davies, SNL
Group Members

ENCLOSURE A

**Assignment List
Thirty (30) Class III Permit Modifications
Scheduled for
No Further Action (NFA's)**

Site Number and Name	Operable Unit	NFA Status	CNWG Member
SWMU 6 - Gas Cylinder Disposal Pit	1335	Yes	Diane Terry
SWMU 6A - New Gas Cylinder Disposal Pit	1335	Yes	Diane Terry
SWMU 28-10 - Mine Shafts	1332	Yes	Diane Terry
SWMU 31 - Electric Transformer Oil Spill	1306	Yes	Ted Truske
SWMU 34 - Centrifuge Oil Spill	1306	Yes	Ted Truske
SWMU 36 - HERMES Oil Spill	1306	Yes	Ted Truske
SWMU 37 - PROTO Oil Spill	1306	Yes	Ted Truske
SWMU 51 - Building 6924 Pad, Tank, Pit	1306	Yes	Ted Truske
SWMU 60 - Bunker Area (North of Pendulum Site)	1333	Yes	Bob Long
SWMU 67 - Frustration Site	1332	Yes	Hal Marchand
SWMU 81A - Catcher Box/Sled Track	1333	Yes	Hal Marchand
SWMU 81B - Impact Area	1333	Yes	Hal Marchand
SWMU 81D - Northern Cable Area	1333	Yes	Hal Marchand
SWMU 81E - New Aerial Cable Test Area, Gun Impact Site	1333	Yes	Steve Dapra
SWMU 81F - Scrap Yard	1333	Yes	Steve Dapra
SWMU 82 - Old Aerial Cable Site Scrap	1332	Yes	Bob Long
SWMU 86 - Firing Site (Building 9927)	1335	Yes	Hal Marchand
SWMU 94C - Bomb Burner Area and Discharge Line, Lurance Canyon Burn Site	1333	Yes	Bob Long
SWMU 94G - Scrap Yard, Lurance Canyon Burn Site	1333	Yes	Steve Dapra
SWMU 100 - Building 6620 HE Sump/Drain	1306	Yes	Craig Richards
SWMU 102 - RAD Disposal (East Tech Area 3)	1306	Yes	Steve Dapra
SWMU 111 - Building 6715 Sump/Drains	1306	Yes	Craig Richards
SWMU 113 - Area II Firing Sites	1303	Yes	Steve Dapra
SWMU 117 - Trenches (Building 9939)	1335	Yes	Bob Long
SWMU 141 - Building 9967 Septic System	1295	Yes	Craig Richards
SWMU 151 - Building 9940 Septic System	1295	Yes	Craig Richards
SWMU 160 - Building 9832 Septic System	1295	Yes	Craig Richards
SWMU 191 - Equus Red	1335	Yes	Bob Long
SWMU 228B - Centrifuge Dump Site	1309	Yes	Diane Terry
SWMU 277 - Potential Site in Foothills Test Area	1332	Yes	Diane Terry

