



March 25, 2002

Ms. Elizabeth Withers  
NEPA Compliance Officer  
Office of the Environment  
DOE LASO  
528 35<sup>th</sup> Street  
Los Alamos, NM 87544

*Via Fax and U.S. Mail*

Dear Ms. Withers,

**Nuclear Watch of New Mexico** (NWNM) submits the following comments on the *Predecisional Draft Environmental Assessment of the Proposed Disposition of the Omega West Facility* (DOE/EA-1410)<sup>i</sup>.

It is worthy of note that NWNM found this Draft Environmental Assessment (Draft EA) to be one of the most comprehensive National Environmental Policy Act compliance documents we have seen from the (now) Office of Los Alamos Site Operations (OLASO). NWNM would like to compliment OLASO on the detail and depth to which it delves into the subject of the proposed disposition of the Omega West Facility. It is our hope that the quality of this document (though replete with typographical errors) is a sign that future OLASO environmental documents will also show quality improvements above and beyond the standard set by this Draft EA.

NWNM strongly supports the Proposed Action of complete removal of the Omega West Facility (OWF), with one major exception. Though the discussion in the Draft EA is comprehensive on the matter of decontamination and demolition (D&D) of the OWF, the Draft EA lacks a discussion of environmental restoration at the Omega West Facility and Technical Area (TA) 2. This is a terrible.

The Draft EA sets a double standard. OLASO uses environmental concerns as the primary justification for the proposed action of D&D activities on the OWF. Yet the Draft EA then goes on to state that Depending on the extent of any contamination and the risk to human health and the environment, ER Project soil clean-up activities may be deferred to a later date, or may occur immediately following the demolition of the Omega West Facility. The ER actions are not a part of the Proposed Action.<sup>ii</sup> This is negligent on the part of OLASO, when there are known quantities of tritium, and likely other contaminants, in the soil surrounding the OWF. The Draft EA states that In 1992, a reactor safety mechanism automatically shut down the OWR [Omega West Reactor]. [This shut down] was attributed to a leak in an underground pipe [which] appears to have been the source of tritium contamination present in the soil at TA-2.<sup>iii</sup> This fact alone should be enough grounds to include risk analysis in the Draft EA, yet OLASO failed to do this.

Los Alamos Canyon, in which the OWF sits, has extensive contamination from radionuclides such as plutonium-239 and 240 along with cesium-137 and americium-241.<sup>iv</sup> Much of the radionuclide

contamination in Los Alamos canyon can be attributed to the outfalls in TA-21 and TA-45, but Several [chemicals of potential concern] are generally collocated with cesium-137 and apparently have primary source areas in the upper Los Alamos Canyon watershed.<sup>v</sup> There are also sources of volatile organic compounds above TA-2 in and around TA-3 which may be finding pathways into Los Alamos Canyon.

Department of Energy environmental cleanup programs have suffered continued cuts over the past five to six years. This year, DOE requested a budget for its environmental cleanup programs at LANL that are 25 percent below the appropriated amount from last year. There is no indication that this current course of slashing environmental cleanup programs will be reversed anytime soon. NWNM believes that it is unlikely that OLASO will make good its commitment to conduct environmental cleanup at the OWF site unless such a commitment were included in the preferred action for D&D activities on the OWF. Though NWNM recognizes the need to timely action because of the threat of flooding, which is all the more a matter of concern after the May 2000 Cero Grande Fire, a complete analysis of all the compounds of potential concern and proposed actions to clean them up, must be included in the Final EA for the D&D of the OWF. To NWNM's knowledge, this is not only a logical step and the one that OLASO professes to be a driving force behind the need for agency action.<sup>vi</sup> Such an analysis would not only be in line with the professed goals of the Draft EA, it would, to NWNM's knowledge, be for the most part an exercise in collecting and compiling reports and studies already in existence that document contamination levels. Such documents include Resource Conservation and Recovery Act Facility Investigations (RFIs), Canyon Reach Reports, etc.

Respectfully submitted,

Colin King

Research Director,

<sup>i</sup> Predecisional Draft Environmental Assessment of the Proposed Disposition of the Omega West Facility at Los Alamos National Laboratory, Los Alamos, New Mexico, Department of Energy National Nuclear Security Administration Office of Los Alamos Site Operations, DOE/EA-1410, February 2002.

<sup>ii</sup> *Ibid.* Section 2.2.1-Soil Contamination, p. 2-11.

<sup>iii</sup> *Ibid.*, p. 2-3.

<sup>iv</sup> Evaluation of Sediment Contamination in Lower Los Alamos Canyon, Reaches LA-4 and LA-5, Reneau, et al, September 1998, LA-UR-98-3975, p. ES-1.

<sup>v</sup> *Ibid.*, p. ES-2.

<sup>vi</sup> The objectives of this EA are to (5) compare the effects of the Proposed Action with the No Action Alternative and other reasonable alternatives. For the purpose of compliance with NEPA, reasonable alternatives are identified as being those that meet NNSA's Purpose and Need for action by virtue of timeliness, appropriate technology, and applicability. The EA process provides NNSA with environmental information that can be used in developing mitigative actions to minimize or avoid adverse effects to the quality of the human environment the goal of NEPA and this EA is to aid NNSA in taking actions that protect, restore, and enhance the environment. *Ibid.*, p. 1-2.