

July 12, 2007

By email to: kcrowley@nas.edu and jwiley@nas.edu

Kevin Crowley
John Wiley
National Academy of Sciences
500 5th Street NW
Washington, DC 20001

Re: Public Peer Review of the “Plans and Practices for Groundwater Protection at the Los Alamos National Laboratory” – Prepublication copy

Dear Messrs. Crowley and Wiley:

Concerned Citizens for Nuclear Safety (CCNS) and Robert H. Gilkeson, Registered Geologist, provide the following public peer review comments to the National Academies of Science (NAS) report, “Plans and Practices for Groundwater Protection at the Los Alamos National Laboratory,” prepublication copy. We were provided with many opportunities to make comments during the 18-month study and appreciate your continued consideration of our input.

In general, we found the prepublication report to be a draft, not a final draft. There are many errors, discrepancies and inconsistencies that passed the scrutiny of the peer reviewers. We are providing a public peer review of the prepublication copy of the report in the eleven attachments to this letter.

We also found bias in the undeserved praise afforded to Los Alamos National Laboratory (LANL) in the language of the report. A clear cut example is the statement that the committee “is not hesitant to take LANL’s motto: ‘The World’s Best Science Protecting America’ at face value.” NAS prepublication copy, p. 3, 103. The purpose of this review is to determine the quality of the science LANL has employed in its ground water protection program, a task which cannot be accomplished if LANL’s motto is accepted “at face value” by the committee. This statement was made in the context of requesting that LANL have its documents peer reviewed, a practice which is “the standard of science.” p. 103. We are concerned that the committee’s hesitance to question LANL on this simple issue is indicative of a general bias in support of LANL, which impacts the credibility of the review.

We have prepared eleven attachments to describe the variety of issues we found in the public peer review. These attachments are:

1. Introduction – A Brief History.
2. An Important Finding of the NAS Committee is that LANL/DOE have Failed to Install a Reliable Network of Monitoring Wells in the Regional Aquifer.
3. The NAS Prepublication Copy Misrepresents Casing Advance Drilling.
4. The NAS Committee Approval of the LANL Interim Groundwater Monitoring Plan is a Mistake that Must Be Corrected in the NAS Final Report.
5. The NAS Committee Approval of the LANL Scheme for Monitoring and Data Quality is a Mistake that Must Be Corrected in the NAS final report.
6. The Impracticable Rehabilitation of the LANL Characterization Wells.
7. The NAS Prepublication Copy Misrepresents the LANL Knowledge of Background Groundwater Chemistry.
8. The Misinformation about Regulatory Requirements in the NAS Report Prepublication Copy.
9. The Presentation of Spurious Groundwater Contaminant Data in the NAS Report.
10. Public Comment is Necessary for the LANL Plans and Reports and for the NAS Final Report.
11. Other General and Specific Comments.

We strongly urge the NAS committee to review our comments, make changes to the prepublication copy and release it again, this time for public comment. Please contact us should you have any questions or comments.

Sincerely,

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Attachments as described above.

cc: Governor Bill Richardson, State of New Mexico
Senator Jeff Bingaman
Senator Pete V. Domenici
Representative Tom Udall
Representative Heather Wilson
Representative Steve Pearce
Governor Jason Johnson, Acoma Pueblo
Governor Ray H. Trujillo, Cochiti Pueblo

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Cabinet Secretary Benny Shendo, Jr., New Mexico State Office of Indian Affairs
City of Santa Fe Mayor Coss and Council Members
County of Santa Fe Commissioners
Española City Council Members
County of Rio Arriba Commissions
Ines Triay, DOE Environmental Management
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George Rael, DOE Los Alamos Site Office
Sue Stiger, LANL Associate Director, Environment Programs
Ryan Coles, Government Accountability Office