

**NORTHERN NEW MEXICO CITIZENS' ADVISORY BOARD  
Recommendation to the Department of Energy**

**No. 2011-08**

**“Restore User Confidence in the Risk Analysis, Communication, Evaluation,  
and Reduction (RACER) Database”**

**Drafted by the NNMCAB Executive Committee**

**Primary Authors: Ralph Phelps & Robert Gallegos**

**Background:**

The Northern New Mexico Citizens' Advisory Board (NNMCAB or CAB) has recently become aware of independent audit results for data provided by both Los Alamos National Laboratory (LANL) and the New Mexico Environment Department (NMED) to document samples taken and processed from the network of monitoring wells and surface water sources that are the baselines for environmental remediation work at LANL.

The results have indicated that a large number of sample data points in the Risk Analysis, Communication, Evaluation, and Reduction (RACER) database are inconsistent with source data or are missing from the database. This has been publicized as a lack of transparency to the public in the conduct of remediation corrective actions and decisions.

The NNMCAB has previously submitted Recommendation 2008-08, “Improve Documentation for Monitoring Wells Used for LANL Environmental Restoration and Cleanup of Legacy Wastes Consistent with Data Quality Objectives.” In Recommendation 2008-08, the NNMCAB recommended, that “DOE support and encourage LANL environmental restoration division management to promote better understanding among the CAB, NMED and independent reviewers of the way that LANL ensures data quality objectives are achieved in their groundwater monitoring program for the Material Disposal Areas (MDAs). This can be achieved through improved documentation, which provides the basis for specifying monitoring well design consistent with meeting required data quality objectives on a site-wide level.” The DOE has responded to this on March 25, 2009 by stating, “DOE continues supporting Los Alamos National Security, LLC (LANS) in improving documentation to communicate to the regulator and the public about the LANL groundwater monitoring program. The objectives for new wells that are being drilled are presented in Drilling Work Plans submitted to the NMED for approval prior to installation. A companion document is prepared that lays out the rationale for final well design and is based on field data collected as part of the drilling phase. These two documents provide the Data Quality Objective (DQO) basis and design approach to allow the understanding of the objectives and how they are being met.”

**Comments and Observations:**

According to the audit's findings, certain limited, environmental data were not provided to RACER in a timely manner. As a result NMED issued a Notice of Violation to LANL for violation of a 2007 Settlement Agreement and Stipulated Order. RACER was established to provide the public access to environmental data collected at LANL.

**Recommendation:**

**No. 1.** DOE should develop a response to the RACER audit that can be presented to the public that explains the issues with the RACER database, and defines the corrective actions to restore confidence in the information. This should include a clear description of the ground rules for data submission, and a description of the method for quality control of RACER data.

**No. 2.** DOE recommend RACER data include a reference to established state and federal standards.

**Intent:**

This recommendation will ensure restoration of public confidence in a database that has been presented as a reliable tool for the public to understand the status of samples from the LANL well and surface monitoring network.

**References:**

1. NNMCAB Recommendation 2008-08, "Improve Documentation for Monitoring Wells Used for LANL Environmental Restoration and Cleanup of Legacy Wastes Consistent with Data Quality Objectives.
2. DOE Response to Recommendation 2008-08, March 25, 2009.
3. RACER website, [www.racernm.com](http://www.racernm.com).
4. NMED June 3, 2011 Notice of Violation