



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

DEC 07 2010

11-AMCP-0021

Mr. S. Harris, Director  
Department of Science and Engineering  
Confederated Tribes of the  
Umatilla Indian Reservation  
46411 Timine Way  
Pendleton, Oregon 97801

Dear Mr. Harris:

INTERIM STATUS GROUNDWATER MONITORING PLAN FOR THE 216-A-29 DITCH,  
DOE/RL-2008-58, REVISION 0, AND INTERIM STATUS GROUNDWATER  
MONITORING PLAN FOR THE 216-S-10 POND AND DITCH, DOE/RL-2008-61,  
REVISION 0

The purpose of this letter is to respond to the Confederated Tribes of the Umatilla Indian Reservation's (CTUIR) October 1, 2010, comments regarding the Interim Status Groundwater Monitoring Plan for the 216-A-29 Ditch, DOE/RL-2008-58, Revision 0, and Interim Status Groundwater Monitoring Plan for the 216-S-10 Pond and Ditch, DOE/RL-2008-61, Revision 0.

The CTUIR expressed a general concern that Resource Conservation and Recovery Act (RCRA) groundwater monitoring does not include radionuclides, suggesting a lack of regulatory integration. The U.S. Department of Energy Richland Operations Office (RL) recognizes the need to integrate dangerous constituents (subject to RCRA) with radionuclides, which are specifically excluded from regulation under RCRA. These groundwater monitoring plans were written specifically to document and meet RCRA regulatory requirements, and therefore do not include radionuclides; however, monitoring of radionuclides is addressed in the Comprehensive Environmental Response, Compensation, and Liability Act process for the respective groundwater operable units. These work plans are DOE/RL-92-76, Revision 1, for 200-UP-1 Operable Unit; and DOE/RL-2007-31, for 200-PO-1 Operable Unit.

RL released these plans as Revision 0, and they are maintained in the Facility Operating Records for the respective treatment, storage, and disposal. Therefore, specific comments that the CTUIR provided will not be addressed at this time. If a need arises to revise either or both of the plans, these comments will be considered in the revisions.

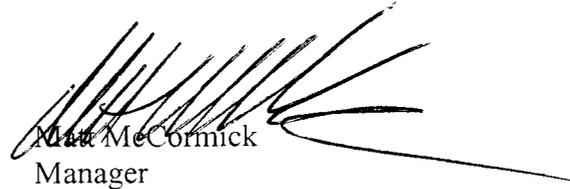
Mr. S. Harris  
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If you have any questions, please contact me, or your staff may contact Rich Holten, Acting Assistant Manager for the Central Plateau on (509) 373-9971.

Sincerely,

  
Matt McCormick  
Manager

AMCP:RDH

cc: D. G. Black, CHPRC  
R. E. Piippo, MSA  
J. G. Vance, MSA  
Administrative Record  
Environmental Portal