



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

11-AMCP-0251

SEP 29 2011

Mr. K. S. Berg, Manager
U.S. Fish and Wildlife Service
Washington Fish and Wildlife Office
Eastern Washington Field Office
11103 East Montgomery Drive
Spokane, Washington 99206

Dear Mr. Berg:

PROPOSED PLAN FOR THE REMEDIATION OF THE 200-CW-5, 200-PW-1,
200-PW-3, AND 200-PW-6 OPERABLE UNITS, DOE/RL-2009-117, REVISION 0

The purpose of this letter is to respond to the September 6, 2011, comments on the Proposed Plan for the Remediation of the 200-CW-5, 200-PW-1, 200-PW-3, and 200-PW-6 Operable Units, DOE/RL-2009-117, Revision 0. The U.S. Department of Energy Richland Operations Office (RL) received these comments on September 15, 2011. While the comment period closed on September 6, 2011, we would like to respond to the comments submitted.

The Washington Fish and Wildlife Office's (FWS) comments focus on a concern about leaving wastes in place fifteen feet below ground surface, and the conclusion in the proposed plan that this will be protective of biological receptors. The comments cite several studies from various environments and countries where rooting depth of plants can extend below fifteen feet. FWS's comments recommend that RL revisit decisions, and suggest that additional site-specific studies may be warranted.

As you know, the State of Washington identifies fifteen feet as the standard point of compliance for human health and ecological receptors direct contact, and has a default assumption that six feet is the biologically active zone. The standard point of compliance is used to represent a depth where human excavation activities occur, and this depth applies to ecological receptors based on this assumption of human excavation bringing up to fifteen feet depth material to the surface. If a depth less than fifteen feet is agreed as a conditional point of compliance, an institutional control to prevent human excavation is placed on the area.

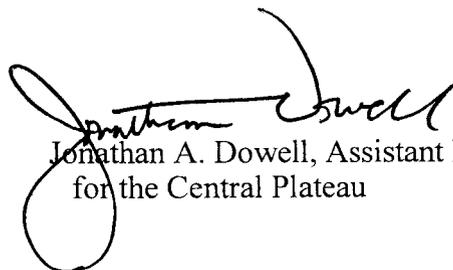
RL is nearing completion of a document entitled, "Evaluation of Biointrusion at the Hanford Site for Protection of Ecological Receptors." This evaluation identifies relevant studies from the Hanford Site and sites with similar climate and geological characteristics (Idaho National Environmental and Engineering Laboratory). In that analysis, RL concludes that most relevant plants have rooting depths less than eight feet, and the maximum rooting depth of a plant at Hanford was ten feet. When finalized, RL will transmit this evaluation and engage in a dialogue with the Trustees and other Stakeholders on its contents.

SEP 29 2011

As Federal agencies, RL would like to promote enhanced cooperation and communication between RL and FWS; specifically, we would encourage FWS to discuss technical concerns such as this prior to issuing formal comment.

If you have any questions, please contact me, or your staff may contact, Briant Charboneau, of my staff, on (509) 373-6137.

Sincerely,



Jonathan A. Dowell, Assistant Manager
for the Central Plateau

AMCP:JAH

cc: D. G. Black, CHPRC
C. E. Cameron, EPA
E. Laija, EPA
R. E. Piippo, MSA
J. G. Vance, MSA
Administrative Record (200-CW-5, 200-PW-1,3,6 OUs)
Environmental Portal