

**DISTRIBUTION  
PROJECT MANAGERS' MEETING,  
200 AREA GROUNDWATER and SOURCE OPERABLE UNITS  
July 16, 2015**

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A3-46

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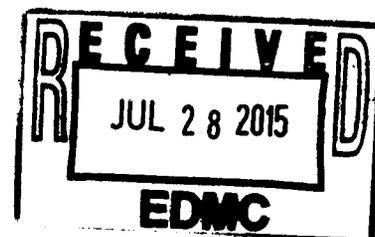
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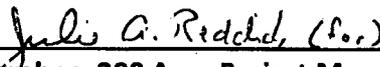
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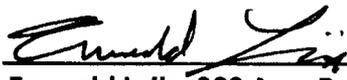


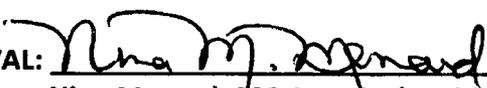
Meeting Minutes Transmittal/Approval  
Project Managers' Meeting  
200 Area Groundwater and Source Operable Units  
July 16, 2015

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APPROVAL:  DATE: 7/16/2015  
Mike Cline, 200 Area Unit Manager, DOE/RL

APPROVAL:  DATE: 7-16-15  
Al Farabee, 200 Area Project Manager, DOE/RL

APPROVAL:  DATE: 7/16/15  
Emerald Laija, 200 Area Project Manager, EPA

APPROVAL:  DATE: 7/16/15  
Nina Menard, 200 Area Project Manager, Ecology

HFFACO Action Plan Section 4.1 requires signature of agreements and commitments made during the Project Manager Meeting. Approval of these minutes documents approval of agreements and commitments documented in Attachment 4 to these minutes. Approval does not apply to any other attachments, which are included in these minutes for informational purposes.

**Minutes of the 200 Area Project Managers' Meeting of July 16, 2015 are attached. Minutes are comprised of the following:**

<b>Attachment 1</b>	<b>Attendance Record</b>
<b>Attachment 2</b>	<b>Agreements and Issues List</b>
<b>Attachment 3</b>	<b>Action Item List</b>
<b>Attachment 4</b>	<b>Operable Units and Facilities Status</b>
<b>Attachment 5</b>	<b>TPA-CN-668</b>

200 Area Project Managers' Status Meeting  
July 16, 2015

PRINTED NAME	ORGANIZATION	O.U. ROLE	TELEPHONE
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Allan Danielson	WDOH		509 727-0445
Dan Beers	WDOH		509-943-6505
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Emy Laija	EPA		
Rod Cobos	EPA		
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Ben W. Vannat	DOE-RL		509 <del>376</del> 9615
Michael Turner	MSA-TPA		376-2872
Mina M. Menard	ECY		376-7941
TIM WELSH	ECY		372-7882
Tim Mullin	ECY		372-7970
Julie Reddick	DOE		376-2003
Edm. Sands	DOE		372-2282
Debi Granwick	DOE		376-0220
Michael Cline	DOE		376-6070
Dib Goswa	Ecology		372- <del>7882</del>

**200 Area Project Managers' Meeting  
Agreements and Issues List  
July 16, 2015**

**Agreement:** None

**Issue:** None

**Announcements:** None

**Delegations for July 16, 2015 PMM meeting:**

DOE/RL Julie Reddick for Al Farabee

**200 Area Project Managers' Meeting  
July 16, 2015**

CHPRC-1501367  
Attachment 3

**OPEN ACTION ITEM TRACKING**

Action #	Action/Subject	Assigned To	Owed To	Assigned Date	Original Due Date	Adjusted Due Date	Status
160	RL to talk to EPA/Craig Cameron regarding U Plant Closure/M-016-200A	DOE/A. Farabee	EPA	11/20/14	1/15/15	3/19/2015	Closed until milestone realignment.
161	DOE to send M15-21A and 92A Change package to Ecology	DOE/B. Vannah	Ecology	1/15/15	4/1/15		Closed; March 31, 2015 agreement letter will address these milestones.
162	Daily DV-1 drilling report to be sent to D. Goswami	CHPRC/M. Doornbos	Ecology/D. Goswami	7/16/15	7/20/15		
163	Review Waste Management Plans with respect to IDW strategy for specificity and consistency.	CHPRC/M. Doornbos	EPA	7/16/15	9/17/15		
164	Add Groundwater Monitoring and AR documents for September meeting minutes	CHPRC/J. Borghese	PMs	7/16/15	9/17/15		

**200 AREA PROJECT MANAGERS' MEETING**  
Milestones and Operational Status by OU  
July 16, 2015

**Deep Vadose Zone 200-DV-1 Ecology Lead (RL – John Morse, CHPRC – Mark Byrnes)**

- **TPA-CN-668: DOE/RL-2011-104 Rev 0 Characterization Sampling and Analysis Plan for the 200-DV-1 Operable Unit.**
  - This approved TPA change notice (Attachment 5) adjusted the analytical performance requirements to reflect the new laboratories being used, deleted Ra-226, Ra-228, and Th-232 from the COPC list, and expanded the health and safety plan text.
- **M-015-110A: Submit RFI/CMS & RI/FS work plan for the 200-DV-1 OU to Ecology.**
  - Ecology comments on the Draft A RFI/CMS & RI/FS WP were received on June 24, 2015. These comments are currently in the process of being addressed.

**Milestone Status:** Complete

- **Perched Water Removal Action Work Plan**
  - The Draft A removal action work plan (DOE/RL-2014-37) and supporting Sampling and Analysis Plan (DOE/RL-2014-51) were delivered to RL on June 25, 2015 for transmittal to Ecology for review. Ecology comments are due back August 27, 2015.
  - The B Area perched water extraction system removed 6,293 gallons in June, bringing the total volume of perched water removed to 290,106 gallons since initiating operations on August 30, 2011. The following quantities of contaminants were removed:

200-DV-1 Perched Water	Current Month	Cumulative
Gallons	6,293	290,106
Tc-99	8.4 E-04 Ci	34.74 E-03 Ci
Uranium	1.8 kilograms	65.2 kilograms
Nitrates	12.9 kilograms	556.1 kilograms

- **M-015-110B: Submit CMS & FS and PP/PCAD for the 200-DV-1 OU to Ecology, 9/30/2015**
  - This work cannot be performed in the time available from issuance of the work plan (March 31, 2015) and the milestone due date of September 30, 2015. This milestone was not adjusted when the M-015-110A milestone was renegotiated.
  - Site characterization field work is scheduled to begin in July 2015. This field work will be implemented in accordance with the SAP.

**Milestone Status:** To be missed. TPA negotiations underway to adjust the milestone date.

**Regulatory Agency Comments:** Ecology comment; any disruptions or changes in drilling be communicated with Ecology/D. Goswami via daily drilling report. See action items.

**200-EA-1 and 200-IS-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Bert Day)****200-IS-1**

- **M-015-112: Submit Draft B, 200-IS-1 OU Pipeline System Waste Sites RFI/CMS/RI/FS WP to Ecology, including a schedule of completion dates for major tasks and deliverables, 2/28/2014.**
  - On December 10, 2013, TPA dispute resolution was invoked and an extension to resolve issues at the project manager level was requested. Ecology agreed to extend the dispute at the project manager's level to September 30, 2015.
  - Transmitted Draft Change Packages C-13-01 and C-14-02 to Ecology on September 16, 2014, noting that C-13-01 included a memo 'Assessment of the Regulatory Pathway to the 200-IS-1 Operable Unit Waste Sites'. The two change packages are undergoing Ecology attorney and RL attorney review regarding TSD designations.
  - Conducted the following workshops and discussions with Ecology:
    - June 4, 2015: TSD definition meeting with Ecology (Ecology attorney, RL attorney, project manager, and staff).
    - June 23, 2015: RCRA/CERCLA Integration workshop.

**Milestone Status:** Dispute resolution. The parties are currently working on identifying the Work Plan scope (e.g., change packages C-13-01 and C-14-02) and associated revised delivery schedule.

**200-EA-1**

- **M-015-92A, Submit a RFI/CMS & RI/FS work plan for the 200-EA-1 OU (200 East Inner Area) to Ecology, 6/30/2015**
  - Not funded in FY14 or FY15 based on site priorities.

**Milestone Status:** To be missed. TPA negotiations underway to adjust the milestone date.

**200-EA-1 and 200-IS-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Bert Day)**

- **M-015-92B: Submit CMS & FS Report(s) & Proposed CA Decision(s)/PP(s) for the 200-EA-1 and 200- IS-1 OUs (Central Plateau 200 East Inner Area) to Ecology, 12/31/2016**
  - 200-IS-1: Milestone date will be adjusted based on outcome of dispute resolution for M-015-112 and associated 200-IS-1 Work Plan approval date.
  - 200-EA-1: Milestone date under negotiations (see M-015-92A discussion).

**Milestone Status:** At Risk. TPA negotiations underway to adjust the milestone date.

**Regulatory Agency Comments:** N/A

**200-SW-2 Ecology Lead (RL- Doug Hildebrand, CHPRC – Bert Day)**

- **M-015-113: Submit Draft B, 200-SW-2 Radioactive Landfills Group RFI/CMS/RI/FS Work Plan to Ecology, including a schedule of completion dates for major tasks and deliverables, 3/31/2015**
  - Received Ecology comments (15-NWP-091) on Draft B RFI/CMS/RI/FS work plan on May 26, 2015 (on schedule).
  - Conducted Draft B RFI/CMS/RI/FS work plan Ecology comment resolution meeting on June 17, 2015.

**Milestone Status:** Complete

- **M-015-93B: Submit RFI/CMS & RI/FS Report & Proposed CA Decision/PP for 200-SW-2, 12/31/2016**
  - *Milestone date will need to be adjusted based on the 200-SW-2 work plan approval.*

**Milestone Status:** At risk. TPA negotiations underway to adjust the milestone date.

**Regulatory Agency Comments:** N/A

**200-SW-1 Ecology Lead (RL- Doug Hildebrand)**

- **EA released for public review August 29, 2011. The last of the public comments were received on November 17, 2011.**

**Schedule Status:** *Due to budgetary constraints, no further action is scheduled for FY15 or planned for FY16.*

**Regulatory Agency Comments:** N/A

**200-BC-1 and 200-WA-1 EPA Lead (RL- John Sands, CHPRC – Mark Byrnes)**

**200-WA-1**

- **M-015-91A: Submit a RI/FS work plan for the 200-WA-1 OU (200 West Inner Area) to EPA, 12/31/2011**
  - *Preparing Draft B RI/FS Work Plan.*

**Schedule Status:** Draft B RI/FS work plan is planned for submittal to the EPA September 30, 2015.

**200-BC-1 and 200-WA-1**

- **M-015-91B: Submit Feasibility Study Report(s) and Proposed Plan(s) for the 200-BC-1/200-WA-1 operable units (200 West Inner Area) to EPA, 12/31/2015**
  - *No action until RI/FS work plan is approved.*

**Milestone Status:** To be missed. TPA negotiations underway to adjust the milestone date.

**Regulatory Agency Comments:** N/A

**200-CW-1, 200-CW-3, 200-OA-1 EPA Lead (RL – Ben Vannah, CHPRC – Bert Day)**

- **M-015-38B: Submit a revised FS Report and revised PP(s) for 200-CW-1, 200-CW-3, and 200-OA-1 OUs for Waste Sites in the Outer Area of the Central Plateau to EPA, 10/30/2015**
  - *No action.*

**Milestone Status:** On schedule. The milestone was revised per TPA Change Request M-15-14-01 to provide a schedule for transmittal of the Outer Area FS Report and revised PP(s) by October 30, 2015.

**Regulatory Agency Comments:** N/A

**200-BP-5 and 200-PO-1 Ecology Lead (RL – John Morse, CHPRC – Curt Wittreich)**

- **M-015-82B: Initiate 200-BP-5 Aquifer Tests Within 6 months of TTP Approval, approval of TTP + 6 months**
  - *The treatability test is planned for August 2015, to accommodate the installation of the uranium treatment system at the 200 West Pump and Treatment Facility, and a pipeline from 200-BP-5 to 200 West P&T.*
  - *Continue installation of the 200-BP-5 pipeline to the 200 West P&T Facility. As of June 30, 2015, completed approximately 14,000 ft out of 48,000 ft of the 200-BP-5 pipeline.*

**Schedule Status:** Treatability test scheduled to start in August 2015.

- **M-015-21A: Submit 200-BP-5 and 200-PO-1 OU FS Report & PP(s) to Ecology, 6/30/2015**
  - *The 200-BP-5 Draft A RI report and 200-PO-1 Draft A RI Report Addendum are scheduled to be provided to Ecology by August 14, 2015 for review. The 200-BP-5 and 200-PO-1 FS Report and PP are planned to be delivered to the regulators by September 30, 2016.*

**Milestone Status:** To be missed. TPA negotiations underway to adjust the milestone date.

**Regulatory Agency Comments:** N/A

**M-015 Milestone Series, Major Milestone Dual Agency Lead**

- **M-015-00: Complete the RI/FS Process for all Non-Tank Farm OUs, 12/31/2016**
  - *This milestone may be impacted by the interim OU milestones stated above.*

**Milestone Status:** At risk.

**Regulatory Agency Comments:** N/A

**200-PW-1/3/6 and CW-5 ROD Implementation EPA Lead (RL- Robert Long, CHPRC –Patrick Baynes)**

- **M-016-125: Submit a Remedial Design/Remedial Action Work Plan for 200-CW-5 and 200-PW-1/3/6 to EPA as described in Section 12.4 of the associated ROD, 9/30/2015**
  - *The Decisional Draft RD/RAWP is under RL review.*

**Milestone Status:** On schedule.

**Regulatory Agency Comments:** N/A

**200-PW-1 Soil Vapor Extraction Operations** EPA Lead (RL – John Morse, CHPRC – Mark Byrnes)

- FY2015 rebound sampling was completed in early June 2015. The rebound study results show carbon tetrachloride concentrations remain below 100 ppmv in all SVE wells, and do not exceed 125 ppmv in any soil vapor probes.
- A path forward document (DOE/RL-2014-18) has been signed by EPA that identifies the specific steps outlined in PNNL-21843 for how a soil vapor extraction project comes to closure.
- Delivered DOE/RL-2014-48, Draft A, "Endpoint Evaluation for the 200-PW-1 Operable Unit Soil Vapor Extraction Operations" to EPA on March 24, 2015, and comments were due May 14, 2015.
- A revised Endpoint Evaluation Power Point presentation, requesting approval to leave the SVE system offline in FY2015, is being prepared and will be presented to EPA in August 2015.

**Regulatory Agency Comments:** EPA Comment; EPA is awaiting a meeting to determine final response on document.

**200-UP-1 Remedy Implementation** EPA Lead (RL – Naomi Jaschke, CHPRC – Curt Wittreich)

- **M-016-190: Complete the installation of extraction and injection wells for the U Plant area pump & treat system for uranium and technetium-99, and the iodine-129 hydraulic containment system as defined in the 200-UP-1 RD/RAWP, 9/30/2015**

- Completed installation of all major pieces of the uranium extraction system (e.g., wells, pipelines, treatment train, inlet tank, pumps and filters). System hookup is underway.
- Initiated the installation of the I-129 hydraulic containment system including well drilling. The installation of these wells is planned to be completed by December 29, 2015.

**Milestone Status:** On schedule. Due date was extended to December 29, 2015, per TPA Change Request M-16-15-05. Extension was needed because of difficult drilling conditions were encountered in the first of the three injection wells.

- **M-016-191: Complete acceptance test procedures and operational test procedures and initiate startup operations for the U Plant area P&T for uranium and tech-99, and Iodine-129 hydraulic containment system, 3/30/2016**

- Completed installation of all major pieces of the uranium extraction system (e.g., wells, pipelines, treatment train, inlet tank, pumps and filters).
- Initiated well drilling for the I-129 hydraulic containment system.

**Milestone Status:** On schedule. Startup of U Plant area P&T for uranium and Tc-99 is planned in FY2015.

- **M-016-192: Submit I-129 Technology Evaluation Plan Draft A to EPA as defined in the UP-1 RD/RA WP, 6/17/2016** EPA Lead (RL – John Morse, PNNL-Wellman)

- Laboratory, field data evaluation and technology reviews are currently being performed to develop the Technology Evaluation Plan Draft A.

**Milestone Status:** On schedule.

- **M-016-193: Complete the remedial design investigation of the SE chromium plume, including the installation of new wells and evaluation of the GW monitoring data and install monitoring wells needed for remedy performance monitoring as defined in the UP-1 RD/RA WP, 9/30/2017 EPA Lead (RL – John Morse, CHPRC – Doornbos)**
  - *Planning three remedial design investigation wells for FY2016.*

**Milestone Status:** On schedule.

**Regulatory Agency Comments:** N/A

**200-ZP-1, 200 West Pump-and-Treat Facility EPA Lead (RL – John Morse, CHPRC – Byrnes/Barrett)**

- *Achieved an average pumping rate of approximately 1,919 in June.*
- *Maintained effluent concentrations below cleanup levels specified in ROD.*
- *Completed construction of injection well YJ16 (699-38-64) in June.*

**Regulatory Agency Comments:** N/A

**200 Area Groundwater**

- **M-016-119-T01: DOE will have a remedy in place to contain existing groundwater plumes (except iodine, nitrate, and tritium) in the 200 NPL Area, 12/31/2020**

**Milestone Status:** On schedule.

**Regulatory Agency Comments:** N/A

**M-016 Milestone Series, Major Milestone Dual Agency Lead**

- **M-016-00: Complete Remedial Actions for all Non-Tank Farms & Non-Canyon OUs, 9/30/2024**
  - *This milestone may be impacted by the interim OU milestones stated above.*

**Milestone Status:** At risk. TPA negotiations underway to adjust the milestone date.

**Regulatory Agency Comments:** N/A

**M-024 Milestone Series/Well Drilling Ecology Lead (RL-John Sands, CHPRC-Mark Cherry)**

- **M-024-58H: Initiate Discussions of Well Commitments, 6/01/2015 – Complete.**
- **M-024-66-T01: Conclude Discussions of Well Commitments, 8/01/2015 – On schedule**
- **M-024-66: DOE Shall Complete Construction of all Wells Identified in M-24-12-01, 12/31/2015 – On schedule**
- **M-024-00O: Complete Well Installations with RCRA/CERCLA Requirements, TBD - In program planning**

**Regulatory Agency Comments:** N/A

**200 Area RCRA TSD Closures** Ecology Lead (RL – John Sands/Joe Axtell, CHPRC – Patrick Baynes)

- **M-037-03: Submit Revised Closure Plans to support TSD closure for two (2) TSD Units: 216-B-3 Main Pond system, and 216-S-10 Pond and Ditch, 4/30/13**
  - Closure plans in NOD process.
  - Issues were elevated to Ecology AGs to help with resolution.

**Schedule Status:** Milestone complete; closure plans undergoing NOD process.

- **M-037-02: Submit Revised Closure Plans to support TSD closure for five (5) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and 216-B-63 Trench, 06/30/2014**
  - Submitted the closure plan and other documentation necessary to close the 207-A South Retention Basin within FY2015 to Ecology.

**Milestone Status:** Complete; closure plans undergoing NOD process.

- **M-037-11: Complete unit-specific closure requirements for two (2) TSD Units; 216-B-3 Main and Pond system and 216-S-10 Pond and Ditch, 9/30/2016**
  - The outstanding Notice of Deficiency comments on the closure plans have not been resolved which prevents finalization of the plans.

**Milestone Status:** At Risk.

- **M-037-10: Complete Unit-Specific Closure Requirements According To The Closure Plan(s) for seven (7) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, 216-B-63 Trench, Hexone Storage and Treatment Facility (276-S-141/142), and 241-CX Tank System (241-CX-70/71/72), 9/30/2020**
  - The permit modification request (PMR) for closure of the 207-A South Retention Basin Treatment, Storage, and Disposal Unit, the 207-A South Retention Basin Closure Plan, the 207-A South Retention Basin Temporary Authorization Request, and the State Environmental Policy Act Environmental Checklist for the Hanford Facility 207-A South Retention Basin (S-2-7), Revision 0 have been provided to Ecology.

**Milestone Status:** On schedule

**Regulatory Agency Comments:** N/A

**Canyon Facilities**

**U Plant Canyon** EPA Lead (RL – Wade Woolery, CHPRC – TBD)

- **M-016-200A: Complete U Plant Canyon (221-U) demolition in accordance with the RD/RAWP, 9/30/2017**  
**Milestone Status:** At Risk
- **M-016-200B: Complete U Plant Canyon (221-U) barrier construction in accordance with the RD/RAWP, 9/30/2021**
  - These milestones may be impacted by the 200-WA-1 and 200-IS-1 OU interim milestones stated above.

**Milestone Status:** At risk. TPA negotiations underway to adjust the milestone date.

**Regulatory Agency Comments:** N/A

**Canyon Facilities EPA/Ecology Lead** (RL – Ray Corey, CHPRC – Moses Jaraysi)

- **M-085-02: Submit Change Package to Establish Schedule for Submittal of RI/FS Work Plans for Canyons and RAWPs for 224B & 224T, 9/30/2015**
  - *Milestone under negotiation.*

**Milestone Status:** On Schedule

- **M-085-01: Submit a Change Package to Establish a Date for Major Milestone M-085-00, 9/30/2022**
- **M-085-00: Complete response actions for the canyon facilities/associated past practice waste sites, other Tier 1 Central Plateau facilities not covered by existing milestones, and Tier 2 Central Plateau facilities. This includes B Plant, PUREX, and REDOX canyons and associated past practice waste sites in 200-CB-1, 200-CP-1, and 200-CR-1 OUs. The milestone does not include U Plant or T Plant canyons, TBD**

**Milestone Status:** In Program Planning

**Regulatory Agency Comments:** N/A



DOE/RL-2011-104, REV. 0

Table 1-2. COPC for 200-DV-1 OU Waste Sites

Radiological Constituents			
Americium-241	Europium 154	Plutonium-238	Technetium-99
Carbon-14	Europium-155	Plutonium-239/240	<del>Thorium-232</del> <sup>i</sup>
Cesium-137	Hydrogen-3 (Tritium)	<del>Radium-226</del> <sup>i</sup>	Uranium-234 <sup>h</sup>
Cobalt-60	Neptunium-237	<del>Radium-228</del> <sup>i</sup>	Uranium-235
Europium-152	Nickel-63	Strontium-90	Uranium-238
Iodine-129 <sup>a,e</sup>			Uranium-233 <sup>e,h</sup>
Inorganic Constituents			
Cadmium	Lead	Ammonia/Ammonium	Nitrate/Nitrite
Chromium	Mercury	Chloride	Phosphate
Chromium(VI)	Nickel	Cyanide	Sulfate
Copper	Silver	Fluoride	Aluminum <sup>b</sup>
Antimony <sup>b</sup>	Manganese <sup>b</sup>	Selenium <sup>b</sup>	Uranium (total) <sup>b</sup>
Arsenic <sup>d,e</sup>	Barium <sup>e</sup>		
Organic Constituents (BY Cribs, 216-B-42, 216-T-18, 216-T-19, 216-S-9, 216-S-13, 216-S-21 waste sites only) <sup>f</sup>			
Tributyl phosphate <sup>g</sup>	Normal paraffin hydrocarbon (kerosene) <sup>e</sup>		
Organic Constituents (216-T-19 waste site only) <sup>d</sup>			
1,1-Dichloroethane	1,2-Dichloroethane	cis-1,2-Dichloroethylene	trans-1,2-Dichloroethylene
1,1,1-Trichloroethane	Acetone	Benzene	n-Butyl Benzene
Carbon tetrachloride	Chlorobenzene	Trichloromethane (Chloroform)	Dichloromethane (Methylene Chloride)
Ethyl benzene	Methyl Ethyl Ketone	Methyl Isobutyl Ketone (hexone)	Phenol
Polychlorinated biphenyls	Tetrachloroethylene	Toluene	Trichloroethylene
Xylene			
Organic Constituents (216-S-13 waste site only) <sup>e</sup>			
Methyl Isobutyl Ketone (Hexone)	Polychlorinated biphenyls		

- a. Not identified for the 200-TW-1 or 200-TW-2 OUs, but included on waste-site specific basis for the 200-DV-1 OU.
- b. Identified as a contaminant of concern in Table 2 of DOE/RL-2004-10, *Proposed Plan for the 200-TW-1 Scavenged Waste Group, the 200-TW-2 Tank Waste Group, and the 200-PW-5 Fission-Product Rich Waste Group Operable Units*.
- c. Analyzed as total petroleum hydrocarbons (kerosene).
- d. Identified as a COPC for 216-T-19 waste site only, in accordance with DOE/RL-2007-02-VOLII-ADD3, *Site-Specific Field-Sampling Plans for the 216-B-42 Trench, 216-S-13 Crib, 216-S-21 Crib, 216-T-18 Crib and 216-T-19 Crib and Tile Field in the 200-TW-1/200-PW-5 Operable Units*, AD3-6.0.
- e. Included for previous 200-PW-3 OU waste sites only (216-S-13), in accordance with DOE/RL-2007-02-VOLII-ADD3, AD3-3.0.
- f. Included for previous 200-TW-1/200-PW-5 OU and 200-PW-1 OU waste sites only (216-B-42, BY Cribs, 216-T-18, 216-T-19, 216-S-9, 216-S-13, 216-S-21), in accordance with DOE/RL-2007-02, *Supplemental Remedial Investigation/Feasibility Study Work Plan for the 200 Areas Central Plateau Operable Units: Volume I: Work Plan and Appendices*.
- g. Analyzed as tributyl phosphate only.
- h. Analyzed as U-233/234 by uranium isotopic alpha energy analysis.

DOE/RL-2011-104, REV. 0

Table 1-2. COPC for 200-DV-1 OU Waste Sites

i. Background radionuclides (potassium-40, radium-226, radium-228, thorium-228, thorium-230, and thorium-232). These naturally-occurring background radionuclides were identified by consensus of Tri-Party managers as not directly related to Hanford operations or processes in the Central Plateau.

COPC = contaminant of potential concern

OU = operable unit

### 1.4 Data Quality Objectives

In early 2011, DOE and Ecology met with site technical experts for a series of facilitated DQO sessions. These sessions reviewed the current state of knowledge for the 200-DV-1 OU sites and developed principal study questions, decision statements, alternative actions, and other data objectives and requirements. The data needs were then determined on a waste site-by-waste site basis to address the principal study questions. Then, the sampling and analysis recommendations in the existing Central Plateau Supplemental Work Plan (DOE/RL-2007-02) were modified as needed to address the 200-DV-1 OU data needs. Through this process, a final set of data requirements was derived. The 200-DV-1 OU data needs and the results of the DQO process for the 200-DV-1 OU waste sites will be documented in the work plan for the 200-DV-1 OU. This SAP describes how those characterization data will be collected.

Table 1-3 lists the DQO principal study questions and decision statements.

Table 1-3. Summary of DQO Principal Study Questions and Decision Statements

Principal Study Question #1	Alternative Actions
Do chemical and/or radiological contaminants in the shallow (0-4.6 m [15 ft] bgs) vadose zone at 200-DV-1 OU waste sites pose an unacceptable risk to human health and the environment under current and/or potential future land use?	No Action.
	Remediate waste site to reduce risk to acceptable levels.
<b>Decision Statements</b>	
#1-1 Determine whether the chemical and/or radiological contaminants within the upper 4.6 m (15 ft) at the 200-DV-1 OU waste sites exceed acceptable risk levels for human health and the environment.	
#1-2 For the 200-DV-1 OU waste sites requiring remediation, determine the extent of chemical and/or radiological contamination within the upper 4.6 m (15 ft) sufficiently for remedy selection.	
Principal Study Question #2	Alternative Actions
Do chemical and/or radiological contaminants in the vadose zone from 200-DV-1 OU waste sites pose an unacceptable groundwater risk to human health and the environment under current and/or potential future land use?	No Action.
	Remediate contamination to reduce risk to acceptable levels.
<b>Decision Statements</b>	
#2-1 Determine whether the chemical and/or radiological contaminants in the vadose zone exceed acceptable risk levels for groundwater.	

Table 2-1. Analytical Performance Requirements for Radionuclides

COPC	Chemical Abstracts Service No.	Preliminary Action Level* (pCi/g)				Hanford Site Background <sup>d</sup> (pCi/g)	Name/ Analytical Technology	Required Detection Limits		Soil* (%)		Water* (%)	
		Human Health (15 mrem/yr <sup>b</sup> )		Groundwater Protection <sup>c</sup>	Ecological Protection			Water (pCi/L)	Soil (pCi/g)	Precision	Accuracy	Precision	Accuracy
		Industrial	Unrestricted										
Americium-241	14596-10-2	335	--	--	3,890	--	Americium isotopic – AEA	1	1	≤30	70-130	≤20	70-130
Carbon-14	14762-75-5	97,300	--	--	--	--	Liquid scintillation	200	50	≤30	70-130	≤20	70-130
Cesium-137	10045-97-3	23.4	6.2	--	115	1.05	GEA	15	0.1 <sup>f</sup>	≤30	70-130	≤20	70-130
Cobalt-60	10198-40-0	4.9	--	--	692	0.00842	GEA	25	0.05 <sup>f</sup>	≤30	70-130	≤20	70-130
Europium-152	14683-23-9	11.4	--	--	1,520	--	GEA	50	0.1 <sup>f</sup>	≤30	70-130	≤20	70-130
Europium-154	15585-10-1	10.3	3	--	1,290	0.0334	GEA	50	0.1 <sup>f</sup>	≤30	70-130	≤20	70-130
Europium-155	14391-16-3	426	--	--	15,800	0.0539	GEA	50	0.1 <sup>f</sup>	≤30	70-130	≤20	70-130
Iodine-129	15046-84-1	3,080	--	--	5,670	--	Chemical separation low-energy photon spectroscopy	20	2	≤30	70-130	≤20	70-130
Neptunium-237	13994-20-2	59.2	2.44	--	1,900	--	Np-237 – AEA	1	1	≤30	70-130	≤20	70-130
Nickel-63	13981-37-8	3,070,000	--	--	--	--	Ni-63 – liquid scintillation	15	30	≤30	70-130	≤20	70-130
Plutonium-238	13981-16-3	470	--	--	6,230	0.00378	Pu isotopic – AEA	1	1	≤30	70-130	≤20	70-130
Plutonium-239/240	Pu-239/240	425	33.9	--	6,110	0.0248	Pu isotopic – AEA	1	1	≤30	70-130	≤20	70-130
Radium-226	13982-63-3	7.03	--	--	50.6	0.815	AEA	1	0.1	≤30	70-130	≤20	70-130
Radium-228	15262-20-1	8-15	--	--	43.9	--	AEA	3	0.2	≤30	70-130	≤20	70-130
Strontium-90	10098-97-2	2,410	3.8	--	22.5	0.178	Total radioactive strontium – GPC	2	1	≤30	70-130	≤20	70-130
Technetium-99	14133-76-7	412,000	8.5	--	4,490	--	Tc-99 – liquid scintillation or GPC	15	15	≤30	70-130	≤20	70-130
Thorium-232	7440-29-1	4.8	--	--	174,000	1.32	Th isotopic – AEA	1	1	≤30	70-130	≤20	70-130
Hydrogen-3 (tritium)	10028-17-8	139,500	--	--	174,000	--	Tritium – liquid scintillation	400	400	≤30	70-130	≤20	70-130
Uranium-233/234 <sup>a</sup>	U-233/234	2,440	--	--	4,830	1.1 <sup>h</sup>	U isotopic – AEA or ICP/MS	1	1	≤30	70-130	≤20	70-130
Uranium-235	15117-96-1	101	--	TBD	2,770	0.109 <sup>g</sup>	U isotopic – AEA or ICP/MS	1	1	≤30	70-130	≤20	70-130
Uranium-238	7440-61-1	504	90.0	TBD	1,580	1.06	U isotopic – AEA or ICP/MS	1	1	≤30	70-130	≤20	70-130

Table 2-2. Analytical Performance Requirements for Nonradionuclides

COPC	Chemical Abstracts Service No.	Preliminary Action Level <sup>a</sup> (mg/kg)				Hanford Site Background <sup>a</sup>	Name/ Analytical Technology <sup>b</sup>	Required Detection Limits (mg/kg) <sup>c</sup>		Soil <sup>d</sup> (%)		Water <sup>e</sup> (%)	
		Direct Contact, WAC 173-340 <sup>b</sup> (mg/kg)		Groundwater Protection <sup>c</sup>	Ecological Indicator Concentration (mg/kg) <sup>d</sup>			Water (mg/L)	Soil (mg/kg)	Precision	Accuracy	Precision	Accuracy
		Method C Industrial	Method B Unrestricted										
<b>Nonradioactive Metals</b>													
Aluminum	7429-90-5	3,500,000	80,000	1,500	50	11,800	EPA Method 6020 or EPA Method 200.8	0.02	0-22.0	≤30	70-130	≤20	80-120
Arsenic	7440-38-2	87.5	0.67	0.034	7	6.47	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.02	2	≤30	70-130	≤20	80-120
Antimony	7440-36-0	1,400	32	5.4	--	5 <sup>m</sup>	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.006	0.6	≤30	70-130	≤20	80-120
Barium	7440-39-3	700,000	16,000	1,650	102	132	EPA Method 6010 ICP Trace or EPA Method 6020	0.005	0.5	≤30	70-130	≤20	80-120
Cadmium	7440-43-9	3,500	80	0.69	4	--	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.002	0.5	≤30	70-130	≤20	80-120
Chromium (total)	7440-47-3	Unlimited	120,000	2,000	42	18.5	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.002	0.2	≤30	70-130	≤20	80-120
Chromium (VI)	18540-29-9	10,500	240	0.2	--	--	EPA Method 7196 – colorimetric	0.01	0.5	≤30	70-130	≤20	80-120
Copper	7440-50-8	130,000	2,960	263	50	22	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.01	1	≤30	70-130	≤20	80-120
Lead	7439-92-1	1,000 <sup>l</sup>	250 <sup>l</sup>	270	50	10.2	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.005	0.5	≤30	70-130	≤20	80-120
Manganese	7439-96-5	490,000	11,200	65	1,100	512	EPA Method 6010 ICP or EPA Method 6020 or EPA Method 200.8	0.005	5	≤30	70-130	≤20	80-120
Mercury	7439-97-6	1,050	24	2.09	0.1	0.33	EPA Method 7470 (water) or EPA Method 200.8	0.0005	N/A	≤30	70-130	≤20	80-120
							EPA Method 7471 (soil) or EPA Method 200.8	N/A	0.2	≤30	70-130	≤20	80-120
Nickel	7440-02-0	70,000	1,600	130	30	19.1	EPA Method 6010 ICP or EPA Method 6020 or EPA Method 200.8	0.04	4	≤30	70-130	≤20	80-120
Selenium	7782-49-2	17,500	400	5.2	0.3	0.78 <sup>m</sup>	EPA Method 6010 ICP or EPA Method 6020 or EPA Method 200.8	0.01	1	≤30	70-130	≤20	80-120
Silver	7440-22-4	17,500	400	13.6	2	0.73	EPA Method 6010 ICP or EPA Method 6020 or EPA Method 200.8	0.002	0.2	≤30	70-130	≤20	80-120

Table 2-2. Analytical Performance Requirements for Nonradionuclides

COPC	Chemical Abstracts Service No.	Preliminary Action Level <sup>a</sup> (mg/kg)				Hanford Site Background <sup>a</sup>	Name/ Analytical Technology <sup>a</sup>	Required Detection Limits (mg/kg) <sup>a</sup>		Soil <sup>a</sup> (%)		Water <sup>a</sup> (%)	
		Direct Contact, WAC 173-340 <sup>b</sup> (mg/kg)		Groundwater Protection <sup>c</sup>	Ecological Indicator Concentration (mg/kg) <sup>d</sup>			Water (mg/L)	Soil (mg/kg)	Precision	Accuracy	Precision	Accuracy
		Method C Industrial	Method B Unrestricted										
Uranium (total)	7440-61-1	10,500	240	1.32	5	3.21	U total - kinetic phosphorescence analysis or EPA Method 200.8 or EPA Method 6020	0.001	1	≤30	70-130	≤20	80-120
<b>Inorganics</b>													
pH (corrosivity)	pH	--	--	--	--	--	EPA Method 9045 or SM4500 PH or EPA Method 150.1 or EPA Method 9040	0.1 pH unit	0-1 pH unit Not Applicable	≤30	70-130	≤20	80-120
Ammonia/ ammonium	7664-41-7	--	--	--	--	28	EPA Method 350.1 <sup>f</sup> or EPA Method 300.7 <sup>g</sup>	0.05	0.5	≤30	70-130	≤20	80-120
Chloride	16887-00-6	--	--	1,000	--	100	EPA Method 300.0	0.2	255	≤30	70-130	≤20	80-120
Cyanide	57-12-5	70,000	1,600	0.80	--	--	EPA Method 9010 or EPA Method 9014 <del>9012</del> or SM4500E CN	0.005	0-51.0	≤30	70-130	≤20	80-120
Fluoride	16984-48-8	210,000	4,800	24.1	--	200 (as fluorine)	EPA Method 300.0 <sup>h</sup> - IC, or EPA Method 9056	0.5	525	≤30	70-130	≤20	80-120
Nitrate	14797-55-8	Unlimited	128,000	40	--	52	EPA Method 300.0 <sup>h</sup> - IC	0.25	3-512.5	≤30	70-130	≤20	80-120
Nitrite	14797-65-0	350,000	8,000	4	--	--	EPA Method 300.0 <sup>h</sup> - IC	0.25	3-512.5	≤30	70-130	≤20	80-120
Phosphate	14265-44-2	N/A	N/A	--	--	0.79	EPA Method 300.0 <sup>h</sup> - IC	0.5	525	≤30	70-130	≤20	80-120
Sulfate	14808-79-8	N/A	N/A	1,030	--	237	EPA Method 300.0 <sup>h</sup> - IC	0.5	527.5	≤30	70-130	≤20	80-120
<b>Organics</b>													
Acetone	67-64-1	Unlimited	72,000	28.9	--	--	EPA Method 8260 - GC/MS	0.02	0.02	≤30	(q)	≤20	(q)
Benzene	71-43-2	2,390	18.2	0.00483	--	--	EPA Method 8260 - GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
n-Butyl Benzene	104-51-8	140,000	3,200	110	--	--	EPA Method 8260 - GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Carbon Tetrachloride	56-23-5	1,010	7.69	0.031	--	--	EPA Method 8260 - GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Chlorobenzene	108-90-7	70,000	1,600	0.874	40	--	EPA Method 8260 - GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Chloroform (trichloromethane)	67-66-3	21,500	164	0.0381	--	--	EPA Method 8260 - GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
1,1-Dichloroethane	75-34-3	350,000	8,000	4.37	--	--	EPA Method 8260 - GC/MS	0.01	0.01	≤30	(q)	≤20	(q)
1,2-Dichloroethane	107-06-2	1,440	11	0.00232 below RDL <sup>a</sup>	--	--	EPA Method 8260 - GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
trans-1,2-Dichloro- ethylene	156-60-5	70,000	1,600	0.543	--	--	EPA Method 8260 - GC/MS	0.005	0.005	≤30	(q)	≤20	(q)

### 2.2.5 Quality Control

The QC procedures must be followed in the field and laboratory to ensure that reliable data are obtained. Field QC samples will be collected to evaluate the potential for cross-contamination and provide information pertinent to field sampling variability. Field QC sampling will include the collection of field duplicates, split samples, and three types of field blanks (full trip, field transfer, and equipment rinsate blanks). Laboratory QC samples estimate the precision and accuracy of the analytical data. Field and laboratory QC samples are summarized in Table 2-4.

Table 2-4. Field and Laboratory Quality Control Requirements

Sample Type	Purpose	Frequency
<b>Field Quality Control</b>		
Field Duplicate	Estimate precision, including sampling and analytical variability.	One per <del>borehole</del> 20 soil samples collected.
Equipment Rinsate Blanks	Verify adequacy of sampling equipment decontamination.	As needed. <sup>a</sup> If only disposable equipment is used, then an equipment rinsate blank is not required. Otherwise, 1 per 20 samples, per media sampled.
Field Split	Indicate inter-laboratory variability.	<del>As needed</del> One per analytical method per media sampled.
Full Trip Blank	Detect contamination from containers or transportation.	One per <del>borehole</del> 20 well trips.
Field Transfer Blank	Detect contamination from sampling site.	One each day VOCs sampled.
<b>Laboratory Quality Control<sup>b</sup></b>		
Method Blank	Assess response of an entire laboratory analytical system.	At least one per batch, <sup>b</sup> or as identified by the method guidance, <i>per media sampled</i> .
Matrix Spike	Identify analytical (preparation + analysis) accuracy; possible matrix affect on the analytical method used.	When required by the method guidance, at least one per batch, <sup>b</sup> or as identified by the method guidance, <i>per media sampled</i> .
Matrix Duplicate or Matrix Spike Duplicate	Estimate analytical accuracy and precision.	When required by the method guidance, at least one per batch, <sup>b</sup> or as identified by the method guidance, <i>per media sampled</i> .
Laboratory Control Samples	Assess method accuracy.	At least one per batch, <sup>b</sup> or as identified by the method guidance, <i>per media sampled</i> .

a. Whenever a new type of nondedicated equipment is used, an equipment blank shall be collected every time sampling occurs until it can be shown that less frequent collection of equipment blanks is adequate to monitor the decontamination procedure for the nondedicated equipment.

b. Batching across projects is allowed for similar matrices (e.g., Hanford Site groundwater). Maximum batch size is 20 samples.  
VOC = volatile organic chemical/compound

## 3.2 Sampling Methods

Vadose zone soil samples will be collected at specific depths using either drive points advanced with DPT equipment, or split-spoon samplers advanced with conventional drilling technology.

### 3.2.1 Direct-Push Technology

Direct-Push Technology (DPT) uses pushing methods, such as a diesel hammer, hydraulic hammer, cone penetrometer, or GeoProbe,<sup>1</sup> to penetrate the vadose zone to collect soil samples and/or to obtain downhole geophysical data. These methods generally are limited in the depth of penetration and in sample volume, compared to conventional borehole drilling. However, they are also generally less expensive than drilling. Table 3-19 includes descriptions of various DPT technologies that may be employed to collect samples specified in this SAP.

Direct-push holes may be installed to obtain spectral gamma, neutron moisture, and/or passive neutron logs and/or vapor samples. Some DPTs also permit soil sampling. The number of samples and the depth of sampling are limited, and capabilities vary with each method.

Soil samples are collected from the direct-push hole using a driven sampling device, similar to a split-spoon sampler. Sampling is conducted first for volatile organic analysis, if required. Then soils are homogenized and subsampled for the remainder of the required analyses. Because of the limited sample size for DPT methods, focused analysis or analysis priorities may be necessary (Section 2.1.4.8). Table 3-19 lists the anticipated maximum depths for these technologies.

#### 3.2.1.1 Single Borehole Approach

At most of the indicated DPT locations, one borehole will be pushed. Samples will be collected in accordance with the details of this SAP. Following sample collection, the borehole will be geophysically logged for both gamma activity and neutron moisture. Following logging, at least one deep electrode will be installed to support surface geophysical exploration. Nominally, the electrode will be placed near the bottom of the hole. This borehole will then be decommissioned.

#### 3.2.1.2 Twin Borehole Approach

At some of the indicated DPT locations, two separate "twin boreholes" will be pushed. The initial borehole will be geophysically logged for both gamma activity and neutron moisture. Following logging, at least one deep electrode will be installed for surface geophysical exploration. Nominally, the electrode will be placed near the bottom of the hole. This first hole will then be decommissioned.

A second DPT borehole will be advanced in the immediate vicinity of the first, with samples being collected in accordance with the details of the FSP in this SAP (Section 3.1), but at depths that may be influenced by the geophysical logging and soil observations obtained by the first push. Section 3.2.3 provides the criteria for collecting samples in the second DPT hole, based on geophysical logging of the first DPT hole.

#### 3.2.1.3 Sonic Capability and Continuous Coring Approach

This approach uses a combination of DPT and sonic drill method, equipped with a Dual Tube Sampling System for continuous soil coring. The Dual Tube Sampling System will retrieve continuous soil cores throughout the length of the borehole, as conditions allow. Geophysical logging for both gamma activity and neutron moisture will support the determination of sample collection intervals. This approach eliminates the need for a twin borehole approach and may be incompatible for grab sample collection.

<sup>1</sup> GeoProbe is a registered trademark of GeoProbe systems, Salina, Kansas.

Where possible, between cores, or during core retrieval and storage, the geologist can observe the core sleeves and document the sediment. Grab samples for geologic description may be obtained from the remaining clean core sections after the scheduled sample volumes have been obtained.

**Table 3-19. Direct-Push Technologies**

<b>Technology</b>	<b>Penetration Depth</b>	<b>Sample Size</b>	<b>State of Development</b>	<b>Comments</b>	<b>Relative Cost</b>
Hydraulic hammer unit	Medium to Deep (61.0 m [200 ft], depending on geology)	2.7 cm (1.08 in.) diameter, 55.9 cm (22 in.) long	Commercial – widely available	Stymied by competent sediments, cobbles/ boulders	Medium
Cone penetrometer	Medium (<45.7 m [150 ft], depending on geology)	2.5 cm (1 in.) diameter, 0.6 m (2 ft) long	Commercial – widely available	Stymied by competent sediments, cobbles/ boulders	Medium
Enhanced Access Penetration System	Medium to Deep (76.2 m [250 ft], depending on geology)	2.5 cm (1 in.) diameter, 0.6 m (2 ft) long	Mature – some refinement needed for difficult conditions	Cone penetrometer that can also drill through fine sediments, boulders	Medium
GeoProbe*	Shallow (<30.5 m [100 ft])	2.5 cm (1 in.) diameter, 0.3 m (1 ft) long	Commercial – widely available	Stymied by competent sediments, cobbles/ boulders	Low to Medium

\* GeoProbe is a registered trademark of GeoProbe Systems, Salina, Kansas.

### 3.2.2 Borehole Drilling

Borehole drilling can be conducted using a variety of equipment depending on data needs. For application to the 200-DV-1 OU characterization, drilling commonly uses a cable tool rig, or a similar type of rig that:

- Enables control of contaminated cuttings
- Permits spectral gamma, neutron moisture, and other types of downhole geophysical logging
- Provides adequate soil return to support soil sampling, either through a split-spoon sampler or through a grab sample

Table 3-20 includes descriptions of various conventional borehole drilling technologies that may be employed to collect samples specified in this SAP.

All drilling will be done using a method approved by the project, and will conform to site-specific technical specifications for environmental drilling services. Drill rigs for deep boreholes will generally require a gravel pad and, in some cases, a gravel access road. Cleaning and decontamination also will be performed in accordance with this SAP.

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Special care should be taken to avoid the following common ways in which cross-contamination or background contamination may compromise the samples:

- Improperly storing or transporting sampling equipment and sample containers
- Contaminating the equipment or sample bottles by setting the equipment/sample bottle on or near potential contamination sources (e.g., uncovered ground)
- Handling bottles or equipment with dirty hands or gloves
- Improperly decontaminating equipment before sampling or between sampling events

The drill rig derrick, all downhole equipment, and temporary casing will be field decontaminated (e.g., high pressure and temperature wash), at a minimum, before mobilization and demobilization at each drilling location.

### 3.2.7 Radiological Field Data

Alpha and beta/gamma data collection in the field will be used as needed to support sampling and analysis efforts. Generally, cuttings from drilled boreholes (excluding slough) will be field screened for evidence of radiological contamination. Screening will be conducted visually and with field instruments. Radiological screening will be performed by the RCT or other qualified personnel. The RCT will record field measurements, noting the depth of the sample and the instrument reading. Measurements will be relayed to the field geologist for inclusion into the field logbook or operational records daily, as applicable.

The following information will be distributed to personnel performing work in support of this SAP.

- Instructions will be provided to RCTs on the methods required to measure sample activity and media for gamma, alpha, and/or beta emissions, as appropriate.
- Information regarding the Geiger-Müller, portable alpha meter, dual phosphor beta/gamma, and sodium iodide portable instruments, will include a physical description of the instruments, radiation and energy response characteristics, calibration/maintenance and performance testing descriptions, and the application/operation of the instrument. These instruments are commonly used on the Hanford Site for obtaining measurements of removable surface contamination measurements and direct measurements of the total surface contamination.
- Information on the characteristics associated with the hand-held probes to be used in the performance of direct radiological measurements will include a physical description of the probe, the radiation and energy response characteristics, calibration/maintenance, and performance testing descriptions, and the application/operation of the instrument. The hand-held probe is an alpha detection instrument commonly used on the Hanford Site for obtaining removable surface contamination measurements and direct measurements of the total surface contamination.

### 3.2.8 Corrective Actions and Deviations for Sampling Activities

The 200-DV-1 OU Project Manager, Field Team Lead, or designee must document deviations from procedures or other problems pertaining to sample collection, chain of custody, COPCs, sample transport, or noncompliant monitoring. Examples of deviations include samples not collected because of field conditions, changes in sample locations because of physical obstructions, or additions of samples. The 200-DV-1 OU field sampling strategy (Section 3.2.3) describes the criteria for selecting and modifying sampling intervals.

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As appropriate, such deviations or problems will be documented in the field logbook or on nonconformance report forms in accordance with internal corrective action procedures. The 200-DV-1 OU Project Manager, Field Team Lead, or designee, will be responsible for communicating field corrective action requirements and for ensuring immediate corrective actions are applied to field activities.

Changes in sample locations not affecting the DQOs will require notification and approval of the 200-DV-1 OU Project Manager. Changes to sample locations affecting the DQOs will require concurrence from DOE and the lead regulatory agency. If unanticipated high contamination is discovered by radiological screening of core or drill cuttings from the bottom (total depth) of the boreholes, a data review will be conducted and a decision will be made on possible extension of the borehole and additional sampling. Decisions to extend or add additional samples currently not defined in this SAP will be made with the consent of the DOE and the lead regulatory agency (Ecology). All of the push/continuous core boreholes have a total depth at or just above the Cold Creek unit. The drilled borehole will be drilled to the water table. Any decision to deepen and obtain additional samples will only be completed if the tasks are achievable using the drilling method available for this work. Changes to the SAP will be documented as noted in Section 2.1.6.

### 3.3 Documentation of Field Activities

Logbooks or data forms are required for field activities. Requirements for the logbook are provided in Section 2.1.5. Data forms may be used to collect field information; however, the information recorded on data forms must follow the same requirements as those for logbooks. The data forms must be referenced in the logbooks.

A summary of information to be recorded in logbooks is as follows:

- Purpose of activity
- Day, date, time, weather conditions
- Names, titles, organizations of personnel present
- Deviations from the QAPjP or procedures
- All site activities, including field tests
- Materials quality documentation (e.g., certifications)
- Details of samples collected (e.g., preparation, splits, duplicates, matrix spikes, blanks)
- Location and types of samples
- Chain-of-custody details and variances relating to chain of custody
- Field measurements
- Field calibrations and surveys, and equipment identification numbers, as applicable
- Equipment decontaminated, number of decontaminations, and variations to any decontamination procedures
- Equipment failures or breakdowns, and descriptions of any corrective actions

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## 4 Health and Safety Plan

Field operations will be performed in accordance with health and safety requirements and appropriate CHPRC Soil and Groundwater Remediation Project requirements. Work control documents will be prepared to provide further control of site operations. Safety documentation will include an activity hazard analysis and, as applicable, radiological work permits. The sampling procedures and associated activities will implement ALARA practices to minimize the radiation exposure to the sampling team, consistent with the requirements defined in 10 CFR 835.

While many of the selected sampling intervals identified in Tables 3-2 through 3-18 of this SAP target those intervals expected to show the highest levels of contamination, it should be noted that this sampling will only be implemented if it can be performed safely. Excavating contaminated soils from intervals of medium-to-high radiological risk should be avoided to reduce the risk of exposure, if possible. If the CHPRC radiological hazard screening concludes one (or more) of the proposed sampling intervals is high or medium hazard radiological work, adjustments will be made to the proposed sampling depths as needed. In this situation, radiological control personnel will perform downhole dose rate measurements prior to authorizing soils to be extracted to the surface.