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**Department of Energy**

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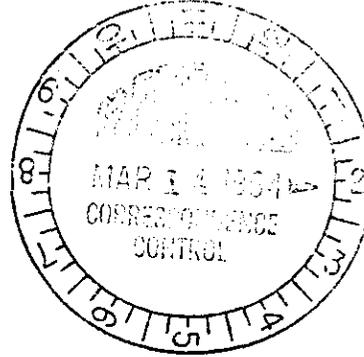
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FEB 28 1994

94-ERB-077

Mr. Dave C. Nylander  
Nuclear and Mixed Waste  
State of Washington  
Department of Ecology  
7601 W. Clearwater, Suite 102  
Kennewick, Washington 99336



Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

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Dear Messrs. Nylander and Sherwood:

SUBMITTAL OF THE LIMITED FIELD INVESTIGATION (LFI) REPORT (ENCLOSURE 1) FOR THE 100-KR-1 OPERABLE UNIT (OU), DRAFT A (DOE/RL-93-78), AND THE QUALITATIVE RISK ASSESSMENT (QRA [ENCLOSURE 2]) FOR THE 100-KR-1 SOURCE OU (WHC-SD-EN-RA-009, REV. 0)

Enclosed please find the subject documents submitted by the U.S. Department of Energy, Richland Operations Office (RL), to the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) for review. Submittal of the 100-KR-1 OU LFI Report completes Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestone M-15-10B which requires RL to submit the 100-KR-1 OU LFI Report to EPA and Ecology by August 31, 1994. The 100-KR-1 OU QRA is provided to facilitate review of the LFI Report. As an LFI Report is roughly analogous to a Phase I Remedial Investigation Report, defined in Table 9-2 of the Tri-Party Agreement Action Plan as a secondary document, RL requests EPA comments (as the lead regulatory agency for 100-KR-1) 45 days after receipt of the subject documents.

RL, EPA, and Ecology agreed to the unique concepts of LFIs and QRAs when adopting the Hanford Site Past-Practice Strategy (HSPPS) for use in September 1991 to create a bias for action. An LFI is an effort to collect limited additional site data which are sufficient to support a decision on conducting expedited response actions or interim remedial measures (IRMs). A QRA is a characterization of risk to human health and the environment associated with waste site contamination not based solely on quantification using existing and available site data. Preparation of an OU specific QRA is a task incorporated in the corresponding OU specific LFI Report. Since September 1991, RL, EPA, and Ecology have worked together on a daily basis to implement HSPPS and conduct LFIs at Hanford.



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The purpose of the 100-KR-1 OU LFI Report is for RL to recommend whether six 100-KR-1 OU high priority past-practice waste sites, as identified and agreed by RL, EPA, and Ecology, continue to be candidates for an IRM since completion of the 100-KR-1 OU LFI. This LFI Report is a compilation and analysis of data relevant to the high-priority waste sites in the 100-KR-1 OU as identified in the 100-KR-1 OU Remedial Investigation/Feasibility Study Work Plan (approved by EPA on August 28, 1992). With this data, and a summary of the associated 100-KR-1 OU QRA, the LFI Report provides a basis for making a defensible recommendation for maintaining IRM candidacy on a waste site by waste site basis.

All six high priority waste sites in the 100-KR-1 OU are recommended by RL for continued IRM candidacy, and will be included in a focused feasibility study for detailed analysis of remedial alternatives scheduled for submittal by RL to Ecology and EPA by April 1995.

As an additional note, RL wishes to illuminate it's submittal of the subject documents to EPA and Ecology approximately six months ahead of it's Tri-Party Agreement interim milestone obligation. By sustaining the schedule advantage provided by an earlier than agreed upon start of field work, RL was able to favorably respond to an EPA request to accelerate 100-KR-1 OU work scope (EPA ltr, to S. H. Wisness from L. E. Gadbois, "Approval of Remedial Investigation/Feasibility Study Work Plan for the 100-KR-1 Operable Unit, Hanford Site, Richland, Washington; Rev. 0," dtd. August 28, 1992). RL accomplished this notable achievement due to a combination of factors including:

- Timely availability of unplanned RL Environmental Restoration Program funds in the second half of FY 1992, created by accrurement of significant savings of money and time due to field work streamlining initiatives, allowing acceleration of work scope for many 100 Area OU drilling activities.
- Commendable response and aggressive action by Westinghouse Hanford Company to RL direction to locate and utilize necessary resources required to accelerate work into FY 1992 when planned for start in FY 1993.
- Cooperation of several EPA and Ecology 100 Area OU managers in working with RL to implement streamlined environmental investigations.

Please address any comments or questions regarding this correspondence or Hanford Site 100-K Area past-practice environmental investigations to Mr. Eric Goller on (509) 376-7326.

Sincerely,



Steven H. Wisness  
Hanford Project Manager

END:EDG

Enclosures: As stated

cc: See page 3

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Messrs. Nylander and Sherwood  
94-ERB-077

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cc w/encls:

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B. Drost, USGS  
R. Scheck, MACTEC (2)  
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cc w/o encls:

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J. Monhart, EM-442  
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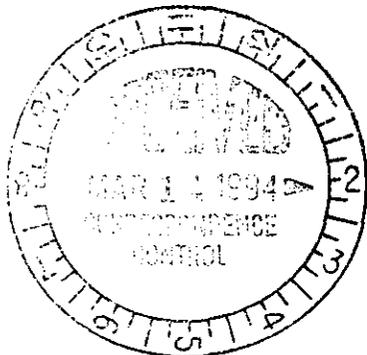
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Subject: SUBMITTAL OF THE LIMITED FIELD INVESTIGATION (LFI) REPORT (ENCLOSURE 1) FOR THE 100-KR-1 OPERABLE UNIT (OU), DRAFT A (DOE/RL-93-78), AND THE QUALITATIVE RISK ASSESSMENT (QRA [ENCLOSURE 2]) FOR THE 100-KR-1 SOURCE OU (WHC-SN-EN-RA-009, REV. 0)

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