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DEPARTMENT OF ECOLOGY

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October 2, 1992

Mr. Steven H. Wisness
Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Wisness:

Re: Review of Integrated Sampling and Analysis Plan for Samples Measuring >10 mrem/hour, WHC-EP-0533, M-10-05

The Department of Ecology received the referenced plan in fulfillment of Interim Milestone M-10-05. We appreciate the quick turn-around time for revision of the document between receipt of our comments of March 6, 1992, and your submittal of the finalized version, on April 3, 1992. Overall, the plan is an improvement on the draft, although it remains difficult to use.

Most of our comments on the draft have been addressed, at least in part, in the finalized version. We still are concerned about the usability of the document, however, due to its organizational structure, and the admitted simplification in some issues. In addition, the need for sufficient funding to meet milestones still remains inadequately addressed. Additional comments are presented in the enclosure. If you have any questions, please contact Megan Lerchen at (206) 438-3089.

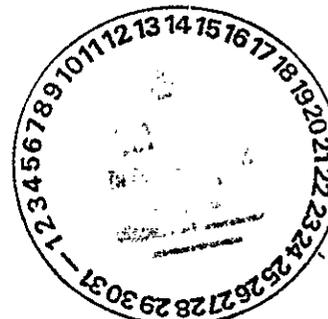
Sincerely,

David B. Jansen, P.E.
Hanford Project Manager
Nuclear & Mixed Waste Management

DJ:ML:dr
Enclosure

cc: [REDACTED]

- John Clark, DOE
- Paul Day, EPA
- Dan Duncan, EPA
- Megan Lerchen, Ecology
- Toby Michelena, Ecology
- Scott McKinney, Ecology
- Dave Nylander, Ecology
- Doug Sherwood, EPA



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Comments on the Integrated
Sampling and Analysis Plan For Samples Measuring
>10 mrem/hour, WHC-EP-0533

	<u>Page</u>	<u>Comment</u>
1.	9	Section 2.1 briefly describes the current Hanford Site analytical capability for samples with dose rates exceeding >10 mrem/hour. The needs identified will not be met until 1998, at the earliest, even with fast-tracking the laboratory upgrades as described in Section 5. It is stated that change control requests have been prepared for these upgrades. Nothing is stated regarding the Department of Energy's view on the viability of these requests. In addition, Section 5 only identifies needs for supporting Milestone M-10-00. It should be clearly stated whether other milestones will be impacted by the available and planned laboratory support.
2.	21	In Part 4.0, Integrated Schedule, the plan states that the integrated sampling schedule is presented in Table 4-1. However, an examination of Table 4-1 shows that the table actually gives the projected program needs and is not a schedule. This misleading text was not revised from the draft; either the table or the text should be changed. Table 4-1 has been modified and appears to be more comprehensive than in the draft plan. However, it would be helpful to give projected Analytical Equivalency Units (AEU) by year rather than the samples and their total AEU's for a number of years. In addition, there is no indication of whether this "schedule" incorporates the predicted laboratory capability shortfall nor what program(s) will take precedence in the allocation of limited resources. Finally, no indication is given of which, if any, of the AEU's listed meet multiple program needs. Deleting the discussion of difficulties in meeting Milestone M-10, which was in the draft version, does not remove our concerns.
3.	25	In Section 5.1 the text states that there is no plan to modify the 222-S or the 325 laboratories for large-quantity alpha analysis and, therefore, the alpha needs for the Solid

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Waste and Waste Receiving and Packaging Programs are not addressed in this evaluation except for a small number of AEU's for investigative or process development work. It should be clarified how the needs for large-quantity alpha analysis will be met and whether there is the likelihood of shortfalls in capacity that would change the predictions or assumptions in this plan. If the needs of any other programs could impact meeting current schedules, they should also be discussed. We remain concerned that concentrating attention solely on Milestone M-10-00 will result in misleading reports regarding laboratory capacity.

4. 29 Section 6.1 states, "A larger portion of the 222-S Laboratory and PNL Analytical Chemistry Laboratory resources could be dedicated to the support of the >10 mrem/hour programs than is currently allocated." This statement should be elaborated upon. In particular, the impact on other agreed upon milestones should be discussed.
5. The draft of this plan briefly discussed the costs for constructing a new laboratory. Copies of the reports for the studies developing these costs were requested for both EPA and Ecology. This has not yet been submitted.
6. 40 The text states that HEIS will contain summary sample and analysis data, and that it will be the source of information for most off-site users. It is not clear how extensive this data will be; this should be elaborated upon.

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Author: D. B. Jansen, Ecology Addressee: S. H. Wisness, RL Correspondence No.: Incoming: 9207527

Subject: REVIEW OF INTEGRATED SAMPLING AND ANALYSIS PLAN FOR SAMPLES MEASURING >10 MREM/HOUR, WHC-EP-0533, M-10-05

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