



# Oregon

John A. Kitzhaber, M.D., Governor

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Jan 25, 1999

Mr. Brian L. Foley  
US Department of Energy  
Richland Operations Office  
3350 George Washington Way  
Richland WA 99352

**RECEIVED**

**JAN 29 1999  
DOE-RL/DIS**

Re: Oregon Office of Energy's Comments on the 200 Areas Remedial Investigation/Feasibility Study Implementation Plan-Environmental Restoration Program. (RIFSIP)

49972

Dear Mr. Foley,

The Oregon Office of Energy has reviewed the draft RIFSIP and has these comments:

We support efforts to expedite cleanup. However, we are concerned with the lack of management detail in the RIFSIP.

Use of the "Analogous Site Approach" will result in a much less rigorous characterization and remedy selection process than normal for individual sites. The document does not contain sufficient technical justification for this approach and has no discussion of the legality of it versus CERCLA/RCRA requirements. This information should be included in this plan.

The RIFSIP contains only general criteria for determining if sites are similar. There is no discussion of what will cause a site to be rejected for a given waste group. Either specific criteria for considering a site to be similar to the representative site(s) or specific criteria for rejecting a site should be listed in the RIFSIP or other appropriate document.

Page 3-4 states that the maximum depth to which plant roots penetrate is approximately 3 meters. However, Big Sage, and Russian Thistle roots can penetrate to depths much greater than that. We recommend that the plan take into account a conservative possible depth for these species.

Page 3-25 infers that once discharge ceased there was no mechanism to drive contaminants downward to groundwater. This is misleading as normal gravitational head and recharge will slowly move contaminants to groundwater. This should be indicated in this section.

Page 5-4, Remedial Action Objectives, bullets 2 and 3 seem redundant. We recommend the most conservative of the two be chosen.



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Page (2)

Page 5-13, Figure 5-2, shows "complete exposure paths," and "incomplete exposure paths," but no explanation of these terms exists in the text or the table. These terms should be defined in the table.

Section 6.2.5.1, borehole drilling, does not discuss the potential problems with drag down contamination, or the possibility of minimizing this via slant drilling. We recommend that these topics be included in this section.

We recommend that the State of Oregon be included specifically in the list of organizations in Section 7.3.4.

The following typographical errors were discovered in the text:

Page 1-2, first paragraph, second sentence, should be "Records of Decision," not Record of Decisions."

Page 1-5, second paragraph, second sentence, should be "Detailed discussion of these subjects is..."

Page 6-5, third paragraph, second sentence, should be "worst case," not "worst cast."

Should you have any questions on these comments, please contact Doug Huston at (503)378-4456.

Sincerely



Mary Lou Blazek  
Administrator  
Nuclear Safety Division  
Oregon Office of Energy

cc: Ms. Donna Powaukee - Nez Perce Tribe  
Mr. J. R. Wilkerson- CTUIR  
Mr. Michael Wilson - Washington Ecology  
Mr. Douglas Sherwood - EPA  
Mr. Russell Jim - Yakama Nation