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June 22, 1999

Larry Gadbois
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, WA 99352

Dear Sir:

Subject: **K Basins Interim Remedial Action**



After attending the 6/10/99 public meeting in Richland, reading the Proposed Plan DOE/RL-98-71, and reviewing several portions of the Focused Feasibility Study DOE/RL-98-66, I support the Hybrid Alternative along with the following comments:

- The experience gained from cleaning out and deactivating the N Reactor Basin should be utilized to the fullest extent possible. This has already started, as evident in Item 1.7 of: *Innovative Work Practices and Lessons Learned at the N Area Deactivation Project*, BHI-01222, Rev. 1, January 1999.
- Water clarity in the K Basins is of great importance. Item 7.4 in BHI-01222 suggests use of fine filtration 3M™ filters to achieve water clarity, and Item 7.18 suggests additional ideas for maintaining water clarity.
- Debris removal should start during SNF removal, and should include treating, as appropriate, and packaging and sending as much as possible to the Environmental Restoration Disposal Facility (ERDF).
- Any broken fuel and/or clad pieces found in either KW or KE Basin should be added into the SNF path in a Multi-Canister Overpack (MCO) as soon as they are discovered, and be sent to the Cold Vacuum Drying (CVD) Facility. Item 7.2 in BHI-01222 suggests use of an eddy current device to identify underwater materials.
- Physically separating sludge into different fractions should start as early as reasonable, particularly in KW where there is very little sludge and where it appears to consist primarily of dust and sediment. Items 7.1 and 7.3 in BHI-01222 suggest use of airlift devices to remove small debris and sediment, and Sandpiper™ pumps to remove sediment, respectively. Item 7.14 suggests creation of isolated areas for [sludge fraction] collections to obtain consolidated, homogeneous samples for characterization before removal and processing.
- My concern is to get rid of sludge plus small particulate matter that could escape to ground water or the Columbia River in case of basin failure or major leak.
- Any acceptable sludge fraction that can be combined with debris plus the organic resin beads (and insoluble solids if available) should be packaged or solidified into commercial or special containers and sent to ERDF promptly. Any containers so generated would be required to meet the ERDF Waste Acceptance Criteria, e.g., not transuranic.
- Any sludge fraction that can easily be treated to meet acceptance criteria for transfer to double-shell Tank 105-AW should be treated and transferred as promptly as possible.
- Any sludge fraction that can easily be treated to meet acceptance criteria for transfer to the Waste Isolation Pilot Project (WIPP) should be treated and packaged to WIPP criteria and then be stored at the Central Waste Complex until it can be sent to WIPP.
- Only the sludge fraction that can not be treated and disposed promptly should be accepted for interim storage in the 200 Areas until final treatment and disposition can be achieved.

Sincerely,

Les Davenport

Les Davenport
Consultant, Criticality Safety Engineer

