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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

February 16, 1995

Mr. Mike Thompson
U.S. Department of Energy
P.O. Box 550, H4-83
Richland, WA 99352

Dear Mr. Thompson:

Re: Completion of 100-D Island Portion of Hanford Federal Facility Agreement and Consent Order Milestone M-16-80

References:

- (1) DOE/RL letter to Steve M. Alexander, Washington State Department of Ecology (Ecology) and Doug R. Sherwood, Environmental Protection Agency (EPA) from Robert G. Holt, similar topic as above, dated November 30, 1994. ✓
- (2) Ecology/EPA letter to Steve Wisness, DOE/RL from Doug Sherwood and Roger Stanley, Ecology, similar topic as above, dated December 14, 1994. 39621
- (3) DOE/RL letter to Doug R. Sherwood and Roger F. Stanley from Steve Wisness, similar topic as above, dated January 30, 1995. ✓

Regarding 100-D Island in reference (1), the U.S. Department of Energy (USDOE)/Richland (DOE/RL) stated "that no additional characterization and/or cleanup efforts are warranted on D Island." EPA and Ecology did not concur. In reference (2), the regulators requested a milestone (draft milestone M-15-80D); "Complete survey of downstream end of D-Island (via a regulator-approved description of work)." Subsequently, in reference (3), DOE/RL indicated "RL will perform a radiation survey of the sandy beach on the downstream end of D Island." Ecology and EPA support DOE/RL in their commitment to do this work.

We have several requests relating to the survey:

- An ultrasonic ranging and data system (USRAD) survey method comparable to the method used at the upstream end of the island be used.
- The regulators be allowed to review the description of work in a timely manner.
- Ecology, EPA, and the Washington State Department of Health be allowed as participants or observers.

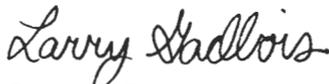


Mr. Mike Thompson
February 16, 1995
Page 2

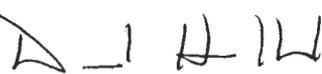
- Several measurements should be collected in the field for detected particles, namely, whether the particle was first detected with the near-surface or the waist-height sensor, the lateral (perpendicular) distance from the transect line, and the depth of the particle. Please note these are parameters which were not reported in the previous report of the survey from the upstream end of the island. These measurements are needed to calculate the surface area and volume of the ground being surveyed. This information was not provided in USDOE's write-up of the earlier survey, yet USDOE's write-up of the earlier survey estimated particle densities leading to the conclusion of "no significant risk to the public from D Island" (reference 1).
- Areas of various grain size from sand through gravel be included. Cobble was surveyed at the upstream end of the island, so this survey should span the smaller size fractions. The survey should not be strictly limited to sandy beach as indicated in reference (3).

If you have any questions, please contact David Holland at (509) 736-3027, Larry Gadbois at (509) 376-9884, or Jerry Yofel at (509) 736-3009.

Sincerely,



Larry Gadbois
Environmental Protection Agency



Dave Holland
Nuclear Waste Program



Jerry Yofel
Nuclear Waste Program

LG/DH/JY:skr

cc: Steve Wisness, USDOE
Doug Sherwood, EPA
J.R. Wilkinson, CTUIR
Donna Powauke, Nez Perce
F. Robert Cook, YIN
John Erickson, DOH
Ralph Patt, HAB
Administrative Records: 100-DR-1