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Department of Energy  
Richland Operations Office  
P.O. Box 550  
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REISSUE

OCT 24 2007

08-AMCP-0011

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Nuclear Waste Program  
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Department of Ecology  
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Office of Environmental Cleanup  
Hanford Project Office  
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EDMC

Addressees:

FINAL PLAN AND SCHEDULE FOR UPDATING THE SUPPLEMENTAL REMEDIAL INVESTIGATION/FEASIBILITY STUDY WORK PLAN FOR THE 200 AREAS CENTRAL PLATEAU OPERABLE UNITS; DOE/RL-2007-02, DRAFT A (VOLUMES I AND II) AND REQUEST FOR ADVANCED APPROVAL TO CONDUCT FIELD ACTIVITIES 0074219

The purpose of this letter is to provide a final plan and schedule to update the Supplemental Remedial Investigation/Feasibility Study Work Plan for the 200 Areas Central Plateau Operable Units; DOE/RL-2007-02, Draft A (Volumes I and II). The Work Plan will be updated in accordance with the comments received from the U.S. Environmental Protection Agency (EPA) dated June 1, 2007, and the State of Washington Department of Ecology (Ecology) dated July 26, 2007, and as clarified in the attachment, the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan Section 9.2.1 and Figure 9-1, and the U.S. Department of Energy, Richland Operations Office (RL) letter (07-AMCP-0283) dated September 17, 2007. 0073936

In RL's letter (07-AMCP-0246) dated August 14, 2007, additional information and clarification was requested on four of Ecology's comments prior to developing responses. Meetings between RL, Fluor Hanford, Inc., EPA, and Ecology were conducted during September 2007 and all major issues have been resolved. Therefore, RL proposes to provide formal comment responses and Revision 0 of the Work Plan to EPA and Ecology by November 30, 2007, for final approval. This date was selected assuming all comments have been received from the regulatory agencies, both on the Draft A document and on the redlined version of the Revision 0 document. 0073739

Addressees  
08-AMCP-0011

-2-

OCT 24 2007

Based on discussions during the comment resolution meetings on September 20 and 25, 2007, RL is requesting EPA approval to begin field activities in accordance with the Work Plan, Sampling and Analysis Plan, and Site-Specific Field Sampling Plans in Addendum 1 of the Work Plan. EPA has been provided the redlined version of the Work Plan and Sampling and Analysis Plan; RL has worked additional comments on the redline and feels that any issues involving work scope for the field activities have been resolved. Therefore, RL is requesting advanced approval for the field work while the document undergoes final updating and final regulatory agency approval. This will allow RL to initiate field work and recover some schedule associated with delays in getting approval of the Work Plan.

If you have any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,

  
David A. Brockman  
Manager

AMCP:BLF

Attachment

cc w/attach:

B. A. Austin, FHI  
G. Bohnee, NPT  
L. Buck, Wanapum  
C. E. Cameron, EPA  
R. H. Engelmann, EFSH  
B. H. Ford, FHI  
S. Harris, CTUIR  
Z. M. Jackson, Ecology  
R. Jim, YN  
S. L. Leckband, HAB  
K. Niles, ODOE  
R. E. Piippo, FHI  
J. B. Price, Ecology  
M. E. Todd-Robertson, FHI  
J. G. Vance, FFS

Administrative Record 17-0-11  
Environmental Portal

Document Number(s)/Title(s)	Program	Reviewer	Organization	Location/Phone
DOE/RL-2007-02, Draft A, <i>Investigation/Feasibility Study Work Plan for the 200 Areas Central Plateau Operable Units</i> (Volumes I and II).	Nuclear Waste Program	J. Price, Ecology, email dated 9/17/2007, clarifying Ecology comments received formally on 9/26/2007	Department of Ecology	(509) 372-7921

Item	Location in Document	Comment	Hold Point	Disposition (Provide justification if NOT accepted.)	Status
1	General	Regarding: "One issue raised by Ecology during the DQO process was the responsibility of USDOE to fill any remaining data needs for closure of the dangerous waste management units covered by this RI/FS work plan (i.e., the 216-A-10 crib, 216-A-36-B crib, and 216-A-37-1 crib)." Ecology is working on renewal of the Hanford Site-wide dangerous waste regulations permit. Ecology will be drafting unit-specific conditions for closure of the 216-A-10 crib, 216-A-36-B crib, and 216-A-37-1 cribs. Although unit-specific conditions have not yet been drafted, there may be opportunity for coordination with this Supplemental RI/FS work plan. At this time, no change to this work plan will be required to address this Ecology comment.			
2	General	Regarding: "Lateral spreading of contaminants in the subsurface at these facilities is to be expected. Lateral characterization information is needed to adequately assess possible remedial measures. Ecology requests Electrical Resistivity Tomography (ERT) evaluation with a follow up DQO to define where additional boreholes or pushes are needed." This comment may be addressed by the changes that we discussed for Section 5.2.1 of the work plan. In summary, DOE should provide more detail on their investigation strategy, esp. the data evaluation approach. We discussed the fact that modeling will have to deal with uncertainties because of the inherent limitations of a single borehole.			

3	General	Regarding: "WMA-A-AX and area wells . . . showed increases as follows . . ." You said in the meeting that DOE/Fluor looked at the wells, and that they appear to be upgradient from the units. Could you clarify whether you thought they were upgradient from ALL wells covered by this work plan (in other words, are you saying that they are NOT downgradient from ANY units covered by this work plan)? I need this additional clarification from you, which I'll discuss with our staff, and then we'll get back to you again.			
4	General	Regarding "We want to remind you that an observational approach to all sampling must be followed." It appeared to Ecology that this work plan follows an "adaptive" sampling approach – but the plan doesn't explicitly say this. A key to this is the commitment to do further DQOs in response to HRR results. In other words, the characterization locations and details may be adapted based on the results of the HRR and DQOs. To address the Ecology comment, can you add some text to Section 5.1.2, to describe the relationship between the SAP, the results of the HRR, the anticipated DQOs, and potential addendum to Volume II?			
5	General	Regarding "Preferred Alternative" heading in Ecology letter, when "AD" Tables refer to preferred alternatives in feasibility studies, could you modify the text to indicate that those are "draft feasibility study."			
6	General	Regarding "The integration of groundwater remediation with source operable unit remediation is another issue related to this RI/FS work plan." To address this comment, could you modify Section 5 of the text to discuss the coordination with (taking advantage of) the Groundwater Project? Also, I believe there were some places in the SAP where the coordination aspect was buried in a footnote, and I believe you committed in our meeting to change that.			