



January 28, 2010

Mr. Matthew S. McCormick
Assistant Manager
for the Central Plateau
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Re: Proposed Plan for Amendment of 100-NR-1/NR-2 Interim Action Record of Decision

Dear Mr. McCormick:

The U.S. Environmental Protection Agency and the Washington State Department of Ecology have reviewed the Proposed Plan for Amendment of 100-NR-1/NR-2 Interim Action Record of Decision. We have several general comments on the document and we request that the U.S. Department of Energy revise the document to address these general comments before we conduct a more thorough review.

If you have any questions, please contact Nina Menard from Ecology at 509-372-7941 or Laura Buelow from EPA at 509-376-5466.

Sincerely,

A handwritten signature in black ink, appearing to read "Nina Menard".

Nina Menard
Ecology Project Manager

A handwritten signature in black ink, appearing to read "Laura Buelow".

Laura Buelow
EPA Project Manager

Enclosure

cc: Mike Thompson, DOE
Alicia Boyd, Ecology
Ken Niles, ODOE
Gabe Bohnee, NPT
Russell Jim, YN
Stuart Harris, CTUIR
Admin. Record: 100-NR-1/-2

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**Issues with the 100-N Proposed Plan (PP)
For Discussion at the USDOE/EPA/Ecology Meeting, 1-14-2010**

1. Ecology would like to the 100-N PP update to include the use of the plug-in approach. However, there is no thorough explanation or clear description of this approach (e.g., when and for which units it would be used). If it will add much time to revise this language, Ecology would rather see it later as a separate document. If DOE still wants to add it now, Ecology recommends that the proposed plan for the Remaining Sites ROD (DOE-RL-97-83) which contained good language describing the plug-in approach be considered. The plug-in approach would also include several contaminants of concern (COC), but the PP only addresses Strontium-90 at this time.
2. The document proposes an increase of the apatite barrier to a length of 600-900 ft with the potential for increase up to 2500 ft. However, DOE is currently planning to drill the wells for the entire 2500 ft of barrier under stimulus money. The total length of the barrier needs to be the option in the proposed plan, especially for cost purposes (only the 600-900 has cost estimates currently).
3. The PP needs to clearly differentiate between TPA milestones M-16-14B (December 31, 2009) and M-15-62-T01 (December 31, 2011). For example, on p 3 in the last paragraph M-15-62-T01 is mentioned and it is unclear whether this is referring to the apatite barrier or the pump-and-treat system since both are mentioned in the same paragraph. It could be interpreted that the apatite barrier is intended to meet the requirements for the 2011 milestone.
4. An operation resumption and an expansion of the existing P&T system should have been evaluated as an option. Even if it is an option that could be discarded easily, we should be able to briefly review the effectiveness and cost reasons for this option not being feasible. Also, the future of the existing P&T system needs to be addressed in the preferred alternative (continued cold stand-by vs. full decommissioning) with appropriate cost estimates included for the work.
5. The remedial action objectives (RAO) from the original ROD for N were somewhat vague. This PP would be a good time to firm up some weak language. The apatite immobilizes the Sr-90 to allow for natural decay versus removal from the aquifer with P&T. This is a different/new RAO that should be laid out.
6. Rather than referencing outside documents (as a PP usually references an FS Report) the PP appears to be reliant on on-going treatability test results and routine monitoring results while at the same time proposing the future action. Understandably, this makes it a bit longer than some PP. Because there is no focused feasibility study to reference in the document, the PP should reference as much developing information (e.g., river upwelling characterization efforts, treatability test results, etc.) as possible.
7. There needs to be better explanation of how this document fits into the larger picture at N Area. It is a proposed plan for an IROD amendment, and within two years the public should see a PP for a final ROD.

8. The PP should include a discussion of the last 5 yr CERCLA IROD review in which it was concluded that it is unknown if the current remedial actions were/are protective. This is to provide some background on why this additional interim action is necessary.
9. Figure 6 boxes stating "116-N-3 Trench Clean Closure Report" and "116-N-1 Trench Clean Closure Report" need to be re-worded to refer to the reports as "Cleanup Verification Packages". Ecology has maintained that releases from the 1325-N LWDF and the 1301-N LWDF have negatively impacted groundwater, thus units are not "clean closed".
10. Figures 4 and 8 100-N Boundary is not comprehensive and needs to be either omitted or redrawn to include the 1325-N LWDF (including piping and other appurtenances).