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DEPARTMENT OF ECOLOGY

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April 25, 1990

Mr. Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352



Dear Mr. Wisness:

Re: Simulated High-Level Slurry Unit Quality Assurance Project Plan

As promised in Ecology's April 17, 1990 comments on the Simulated High-Level Waste Slurry Unit Closure Plan, this letter transmits our comments on the Quality Assurance Project Plan (QAPjP) for the Simulated High-Level Slurry Unit.

Technical inquiries regarding these comments should be directed to Mike Gordon of my staff at (206)438-7024.

Sincerely,

Timothy L. Nord
Hanford Project Manager

Enclosure

cc: Cliff Clark
Dan Duncan
Toby Michelena
Wayne Slater
Jack Waite (AR)



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DEPARTMENT OF ECOLOGY
COMMENTS ON THE QUALITY ASSURANCE PROJECT PLAN FOR CLOSURE OF THE
SIMULATED HIGH LEVEL WASTE SLURRY TREATMENT AND STORAGE UNIT
April 25, 1990

The following comments reference page and section numbers from the February 23, 1990 draft of the Quality Assurance Project Plan (QAPjP) - Simulated High Level Waste Slurry Treatment and Storage Unit Closure.

Section

- 1 5.0 **Deficiency:** QA Objectives should include the numerical requirements for precision and accuracy. Section 5.0 merely presents a general discussion of the concepts.

Requirement: In addition to stating that precision will be determined by collecting duplicate samples, an acceptable relative percent difference between field duplicates should be specified.

- 2 5.4 **Deficiency:** The definition of completeness is inadequate. A better definition of completeness would be, "the percentage of measurements planned which are judged to be valid." The success of the project might be jeopardized if the planned sampling was not completed.

Deficiency: Section 5.4 should be changed accordingly.

- 3 5.5 **Deficiency:** The comparability of substitute analytical procedures cannot be established without a formal comparability study. Analyzing duplicates of 20% of the X-Ray Fluorescence (XRF) samples using SW-846 methods will not demonstrate the comparability of XRF results with other established methods such as AA or ICP.

Requirement: USDOE/PNL should provide documentation that XRF will produce comparable results to ICP and AA under conditions similar to those at the SHLWS site.

- 4 6.3 **Deficiency:** The holding time limit for volatile organics is 14 days, not 20 days as stated in the QAPjP.

Requirement: Section 6.3 should be revised accordingly.

- 5 11.0 **Deficiency:** Under laboratory activities, the number of method blanks in a "set" is not specified.

Requirement: Section 11.0 should be revised to specify the number of method blanks per set.

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Comments on SHLWS
QA Project Plan
April 25, 1990

- 6 12.0 Deficiency: The discussion of systems and performance audits is confusing.

Requirement: Section 12.0 should be revised to clarify that a systems audit is based on compliance with the QA project plan and should be conducted by someone other than the project QA officer. Section 12.0 should also be revised to clarify that a performance audit requires the submission of performance evaluation samples (certified standard reference materials or their equivalents) whose concentrations are unknown to the laboratory. The purpose is to demonstrate the lab's capability to perform the analyses on "ideal" samples.

- 7 14.0 Deficiency: Section 14.0 incorrectly states that field pH measurements will be used to assess data accuracy and precision.

Requirement: Section 14.0 should be revised to clarify that procedures for the field pH measurements really "control" rather than "assess" the accuracy and precision. (The instrument is adjusted until the standards read within ± 0.05 pH units and the samples are analyzed until sequential readings are within ± 0.01 pH units.)

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Author	Addressee	Correspondence No.
T. L. Nord, Ecology	S. H. Wisness, DOE-RL	9001878

Subject: Simulated High-Level Slurry Unit Quality Assurance Project Plan

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