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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

August 31, 1992

Mr. Eric Goller
U.S. Department of Energy
P.O. Box 550
Richland WA 99352



Dear Mr. Goller:

Re: Comments on the 100-DR-1 Nonintrusive Sampling DOW

The following are comments related to the description of work for the 100-DR-1 Nonintrusive Source Sampling (WHC-SD-EN-AP-067, Rev. 3). Please incorporate these comments.

Please feel free to contact me at our Kennewick Office (546-2968) if you have any questions about my comments.

Sincerely,

Jeff Phillips
Unit Manager
Nuclear and Mixed Waste Management Program

JP:sl
Enclosure

cc: Darci Teel, Ecology
Mike Stankovich, WHC
~~Tim Venezizno, WHC~~



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Comments and Recommendations on
100-DR-1 Nonintrusive Sampling Description of Work (DOW)

General Comments/Recommendations

1. A schedule for transmittal of all planned DOW's should be given to the Operable Unit (OU) manager. The purpose of this is to assist the regulators in scheduling their time so that lack of concurrence does not prevent USDOE from performing field investigations.
2. Any field change to an approved DOW must be brought to the attention of the lead regulatory agency within 10 days. Changes made prior to commencing field activities must result in a revised DOW.
3. Each activity should have it's own DOW. The DOW cannot be used for multiple investigations unless the lead regulatory agency concurs.

Specific Comments

1. Comment/Recommendation: Section 3.2.1

The dimensions of the test pit should be further described. The text reads, "A test pit, approximately 32 by 3 ft., will be dug approximately 5 ft. north of the 108-D building site". On page seven of the same section, the text states the pipeline egress is 15.5 feet deep. If the area around the pipeline egress is to be sampled, the depth of the test pit should be adjusted.

2. Comment/Recommendation: Section 3.2.4

If the sanitary sewer pipeline is not located, the depth of the sample to be taken should be identified.

3. Comment/Recommendation: Section 3.3.2.2

The first and third sentences of the paragraph should be combined to read "The field screening discussed in this section is for the purpose of selecting samples for laboratory analysis".

4. Comment/Recommendation: Section 3.4.3.2

Further explanation is needed as to why no field screening is being performed at the Ash Disposal Basins.

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5. Comment/Recommendation: Section 3.4.3.3

Why would full sample volume requirements not be met? The text should further describe the circumstances where sample volumes would not be met.

6. Comment/Recommendation: Section 3.4.4

It should be noted that the QA/QC samples are in addition to the five samples being collected. The text needs to justify (beyond the reference) why the trip blank and field blank have been deleted.

7. Comment/Recommendation: Section 3.5.3

The first and third sentences of the paragraph should be combined to read "The field screening discussed in this section is for the purpose of selecting samples for laboratory analysis".

8. Comment/Recommendation: Section 3.5.3.3

Why would full sample volume requirements not be met? The text should further describe the circumstances where sample volumes would not be met.

9. Comment/Recommendation: Section 3.5.4

The term "continuously screened" should be further defined.

The last sentence in the last paragraph states "Should any waste be generated...". The conditions in which waste would be generated should be discussed.

10. Comment/Recommendation: Section 3.5.5

It should be noted that the QA/QC samples are in addition to the five samples being collected. The text needs to justify (beyond the reference) why the trip blank and field blank have been deleted.

If there is indication of contamination, an additional sample should be taken at a depth below the first sample. Two samples will provide information about contaminant concentrations. This would bring the total possible number of samples to six.

11. Comment/Recommendation: Section 3.6.3.2

The check of the background levels should be further described (ie. where, which building, inside/outside, how high?).

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12. Comment/Recommendation: Section 3.6.3.3

Why would full sample volume requirements not be met? The text should further describe the circumstances where sample volumes would not be met.

13. Comment/Recommendation: Figure 10, page 29

North should be identified.

14. Comment/Recommendation: Figure 1, page 30

List the method used for Total Activity.

15. Comment/Recommendation: Section 7.0

The schedule should reflect currently planned sampling dates.

16. Comment/Recommendation: Section 8.0

The word "major" should be deleted from the first sentence.

The ECN should be inserted into the 100-DR-1 project file, not the 100-H and 100-B project files.

The last sentence should be changed to read "Copies will be submitted to the regulatory agencies and the appropriate field personnel within 10 days of the change".

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Author

Addressee

Correspondence No.

J. Phillips, Ecology

E. Goller, RL

Incoming 9205960
Action as stated.

Subject: COMMENTS ON THE 100-DR-1 NON-INTRUSIVE SAMPLING DOW

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*Received letter and attachment in original transmittal.



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