



STATE OF WASHINGTON
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

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August 12, 2010

Ms. Paula Call
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A7-75
Richland, Washington 99352

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EDMC

Dear Ms Call:

Re: *Engineering Evaluation/Cost Analysis (EE/CA) for the 212-N, 212-P, and 212-R Facilities, Addendum 1: Disposition of Railcars; DOE/RL-2008-07-ADD1, Revision 0*

The Radioactive Air Emissions Section (RAES) has reviewed the information contained in the referenced EE/CA. We are interested in this project because of the potential for radioactive air emissions and our obligation to assess public impacts from Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) cleanup activities. Our comments pertain to deactivation activities conducted in the "open air" without the benefit of a confinement for similar operations conducted within a facility with a filtered air space.

The list of Applicable or Appropriate and Relevant Requirements (ARARs) for radioactive air emissions seems to consider some of the minimum design and emission standards of Washington Administrative Code (WAC) 246-247. We understand some of these may be addressed with greater detail in the Removal Action Work Plan (RAWP) and the Air Monitoring Plan (AMP) for the specific action chosen. However, some requisite portions of WAC 246-247, listed below, lack specific detail in the EE/CA or were historically insufficient in previous cleanup documents:

1. Continuous monitoring of all radioactive air emissions is required for activities that have the potential-to-emit greater than 0.1 mrem/yr. This can be attained by use of containment, ventilation and monitoring of the ventilation stack, unless an approved alternative method is approved by RAES. In some activities, such as low-level soil excavation where the potential-to-emit may be below 0.1mrem/yr, emissions can be calculated using soil sample data and a calculation method approved by the regulatory authority. Containment, ventilation, and stack air monitoring must be considered in a Best Available Radionuclide Control Technology (BARCT) analysis.
2. The BARCT standard of WAC 246-247-040 requires an activity-based BARCT evaluation, as described in WAC 246-247-120. The regulatory authority is responsible to



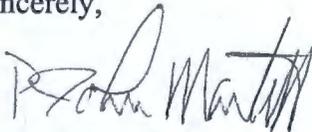
ensure a thorough and complete BARCT evaluation is addressed, at or near time of the performance of the activity.

3. The As Low as Reasonably Achievable (ALARA) emission standard (WAC 173-480-050). An activity-specific ALARA standard exists in WAC 246-247, by reference to WAC 173-480-050. It is not sufficient that the Hanford Site as a whole remain below 10 m/remyr standard of the Code of Federal Regulations (CFR) 61.92. Each activity should have an emission limit, to represent ALARA by the regulatory authority.
4. Provisions to demonstrate and record compliance with the ARARs cited. Substantive provisions for monitoring radioactive air emissions per WAC 246-247 requirements are a fundamental part of the state regulations. These requirements are necessary to determine the environmental impact of the cleanup activities on the Hanford Site. Although some of the requirements are administrative in nature, it is clearly in the public interest to ensure transparency in regard to radioactive air emissions during Hanford clean-up activities. Demonstration of monitoring radioactive air emissions and accessibility of records to RAES and the public should be covered in the requirements.

These comments may affect potential costs and are appropriate to consider at this stage of planning. At a minimum, we expect the potential to emit, control technology selection, and compliance monitoring to be accurately addressed in specific detail. We would also request that the U.S. Department of Energy report the public dose consequences at the end of this project so they can be compared with the doses projected.

If you have questions regarding these comments, please contact Jack Culmer at (509) 946-0790.

Sincerely,



John Martell, Manager
Radioactive Air Emissions Section

cc: Jack Culmer, WDOH
Allan Danielson, WDOH
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