



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 23, 2000

Mr. Glenn I. Goldberg
Project Manager, Environmental Restoration Division
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: HO-12
Richland, Washington 99352

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EDMC

Dear Mr. Goldberg:

Re: Review Comments on the *Sampling and Analysis Plan for the 100-NR-1 Treatment, Storage, and Disposal Units During Remediation and Closeout*,
DOE/RL-2000-07, Draft A

Enclosed for your review and resolution are the Washington State Department of Ecology's (Ecology) comments on the above subject document. The document requires modification prior to final approval by Ecology. For convenience, the comments are presented in two (2) areas: general and specific.

Please contact me at (509) 736-3037 if you have any questions or concerns regarding these comments.

Sincerely,

Rick Bond
N Area Project Lead
Nuclear Waste Program

RB:lkd

Enclosure

cc: Dennis Faulk, EPA
J.R. Wilkinson, CTUIR
Pat Sobotta, NIP

Nanci Peters, YIN
Mary Lou Blazek, OOE
Administrative Record: 100-NR-1 Operable Unit

Official Ecology Comments on DOE/RL-2000-07, Draft A
Sampling and Analysis Plan for the 100-NR-1
Treatment, Storage, and Disposal Units
During Remediation and Closeout

March 23, 2000

General Comments

1. The report contains all the necessary elements of a sampling and analysis plan (SAP). The next draft of the plan can be approved once the comments listed below are addressed to the satisfaction of Ecology.
2. The records show that methanol was used at N-reactor; however, it is not known whether methanol is contained in the waste. Check to determine if methanol has ever been sampled for in the soils beneath 116-N-1 and/or 116-N-3. If methanol has not been sampled for, collect a minimum of 5 samples from the general area where you would expect the highest concentration of contamination with consideration of ALARA and analyze for methanol. Use the analytical results to make a contained in determination so that the F003 code can be removed from the waste and the waste can be sent to ERDF.
3. When analyzing samples for metals, run the analyses for all MTCA and RCRA metals.
4. Include language in the document stating why you are not taking any composite samples and explain why this approach is more conservative.

Specific Comments

1. Page 1-9, Table 1-1: In then title line of Table 1-1 on the second page (and in all tables in the document that continue on a second page), I recommend you state that the table is "(continued)" rather than state "(2 pages)". This could be done for all tables in the document.
2. Page 1-9, Table 1-1: Define "WS#" in the footnotes.
3. Page 1-11, 3rd Paragraph (No. 4): Sentence needs rewording. I suggest "...levels of overburden and layback soil ~~exceed meet~~ site criteria identified in the ROD ~~for meet criteria~~ for backfill or if the soil..."
4. Page 2-2, Table 2-1, Preliminary Action Level column: It is not clear how these Action Levels were calculated. I assume they were taken from the ERDF Waste Acceptance Criteria dose numbers (in units of Ci/m³) and converted to concentration/activity (in units of Ci/g). Please clarify where these numbers came from and check to be sure they are correct.

5. Page 2-2, Table 2-1, Preliminary Action Level column: The Preliminary Action Levels listed for Americium-241 and Nickel-63 are different than what is listed in Table B-1 on page B-2. Please check and correct, or explain the discrepancy.
6. Page 2-2, Table 2-1, Preliminary Action Level column: It is not clear what "N/A" means in this column (i.e., the contaminant is not expected to be present in that zone, there is no action level for that zone, etc.). Please define N/A more clearly.
7. Page 2-2, Table 2-1, Analyte column: Why are uranium-233/234, uranium-235, and uranium-238 listed when they are not listed as contaminants of concern (COCs)?
8. Page 3-7, Section 3.2.1.2, #1: It is not clear what the 20% of excavator bucket means. Do you mean the outside of the bucket. Please clarify. Sentence could be changed to read "...the contents of 20% of **every** excavator bucket ..." or "...20% of the contents of each excavator bucket..." This same sentence appears throughout the document and should be changed.
9. Page 3-9, Section 3.2.1.7, First Paragraph, Last Sentence: Fix "placed into ~~in~~ 500-ml..."
10. Page 3-15, Section 3.2.3.1, #1: Rather than say "in the deep zone", shouldn't this sentence state "in the overburden/layback soil"?
11. Page 3-16, Section 3.2.4.1, First Sentence and #1: Rather than state that "debris" needs to be sampled and only list one piece of debris "(e.g., 120-N-2 liner)", specify by name exactly what needs to be sampled so the sampler knows without any question.
12. Page 3-16, Section 3.2.4.3, Second Sentence: Delete "a" in "random sampling is not a feasible and samples will be..."
13. Page 3-18, Section 3.3.1, Second Paragraphs after bullets, Last Sentence: It is not clear where the where the "laboratory or field contamination procedures **referenced above**" are referenced. Please clarify. Also, should it state **decontamination** procedures referenced above?
14. Page 3-21, Section 3.3.3.1, First Sentence: What is meant by "frequency" when it says, "Table 3-1 summarizes the **frequency** and method of field measurements for excavation?" Do you mean the "number of samples" and method? Also, see Section 3.3.3.3, last line, for the same comment regarding "frequency".