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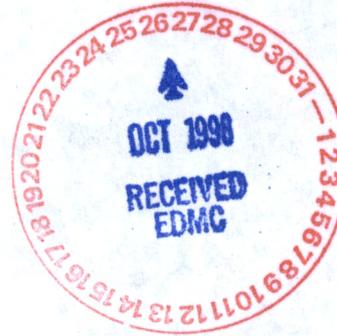


WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

April 29, 1998
HGP-GO1-98-0035

Mr. Phil Staats
Environmental Specialist/Unit Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, WA 99336-6018



Dear Mr. Staats:

Subject: **SUPPLY SYSTEM COMMENTS ON 100-N CLEANUP DOCUMENTS**

Reference: Letter, D. E. Olson (Department of Energy), to Steve M. Alexander (Department of Ecology), 100-N Cleanup Documents, dated March 6, 1998.

Now that HGP's mission is over, the Supply System is in the process of restoring the HGP site as required by our original lease with the DOE. Although much of the documentation in the cleanup documents do not specifically apply to HGP, please consider our comments accordingly.

The Supply System has reviewed the following documents which were enclosed with the referenced correspondence.

- Engineering Evaluation/Cost Analysis for the 100-N Area Ancillary Facilities and Integration Plan, DOE/RL-97-22, Rev. 1. 48685
- Proposed Plan for Interim Remedial Actions at the 100-NR-1 Source Sites Operable Unit and the 100-NR-2 Groundwater Operable Unit (100-NR-1/100-NR-2 Proposed Plan), DOE/RL-96-102, Rev. 0. 48686

- Corrective Measures Study for the 100-NR-1 and 100-NR-2 Operable Units, DOE/RL-95-111, Rev. 0.

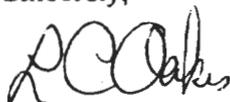
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We have three general concerns; 1) the proposed rural residential level of remediation, 2) cost, and 3) schedule.

- Based on the HGP site's location, the Supply System believes that the selection of a rural residential cleanup level is not warranted.
- The Supply System, as a fiscally responsible municipal corporation of the State of Washington, wants to minimize any undue burden on our customers. Therefore, it is in our best interest to immediately proceed with decontamination, demolition, and restoration, as necessary, to restore the HGP site. The resources are currently available and we intend to proceed at a quicker rate than proposed by the 100 Area remediation schedule.
- The proposed schedule should provide the flexibility to permit immediate completion of the restoration work at HGP. The documents provide a schedule which indicates that Remedial Unit #5 (HGP facilities) has a low priority. Priorities were based on several factors including current contamination level, public safety, protection against further contamination, and availability of resources. The Supply System has already begun restoring the HGP site with a two-to-three year completion schedule. An asbestos contractor began removing the exterior ACM material in December and will be completed in May. A contract for interior asbestos removal will immediately follow. It is also our intent to begin cleanup of the non-radioactive environmental sites as soon as the review and decision process allows. The radioactive environmental sites can also be scheduled beginning in 1998, provided agreements for the cleanup process can be reached with the USDOE using the framework of these documents.

To minimize any confusion regarding which facilities are located at the HGP site, a listing of HGP facilities and HGP environmental areas is attached, most of which are already identified in the applicable Corrective Measures Study. The second attachment provides a few specific comments to the documents.

Sincerely,



for David W. Fraley, Manager
WNP-1/3, HGP and Packwood
Mail Drop 817

HGP Facilities and Environmental Areas

Description	Rad?	Facility Number	Environmental Area Number	SWMU Number	Notes
BPA Switchyard		155-N	100-N-35 100-N-39		
HGP River Pump House		181-NE			
HGP Steam Plant	yes	185-N	100-N-50 100-N-51A 100-N-51B	2 3 4	Oil Storage Drains, Sumps Turbine Filters
HGP Gate Guard House		1701-NE	100-N-41	9	Waste Drains
HGP Office Building		1703-N	100-N-45	9	Waste Drains
HGP Boat House		1707-N			
HGP Maint. Garage		1716-NE	100-N-3 100-N-52	8 8	Waste Drain Building Area
HGP Pipe Trestle	yes	1802-N			
HGP Seal Well	yes	1908-NE		7	
HGP Settling Pond	yes		100-N-1	6	
HGP Tile Field	???		100-N-4	5	
HGP Bone Yard			100-N-5	10	
HGP Burn Pit	yes		100-N-18		
HGP Construction Dump	???		100-N-19	11	
HGP Diesel UST			100-N-46		
HGP Transformer Yard			UPR-100-N-37	1	
HGP Trestle Drains	yes		??????		

Supply System Specific Comments

Engineering Evaluation/Cost Analysis ...

1. Page 1-2, Line 11 The Supply System would like to follow its own schedule to complete the work earlier than scheduled. This EE/CA should allow the Supply System to fund and contract for cleanup, decontamination, and demolition to a selected contractor of our own selection in accordance with our procedures as long as the cleanup, etc. meets the technical requirements of this EE/CA.
 2. Page 2-9 In first bullet, it is on the northwest wall.
 3. Page 2-15 The physical description for 181-NE is incorrect. The facility houses four circulating pumps and their respective lubricating water pumps in addition to the three fire protection pumps.
 4. Page 2-16 There is no 1605-NE Observation Post at HGP. Also see Figure 2-1.
 5. Page 3-1 In third paragraph, it should be clarified that areas inside the HGP fence do not interfere with any other cleanup operations.
 6. Pages A-6,7 The availability of basic utilities is essential to keep demolition costs under control. However, we are already addressing the loss of power to HGP and there is no potable water or sewer system. In addition the rail lines should be maintained for demolition. The large transformers are normally moved by rail.
- Appendix C The cost estimates were based on a model that the Supply System has already shown to be unreliable for our work.

Proposed Plan For Interim Remedial Actions ...

No specific comments other than those already identified.

Corrective Measures Study ...

1. Page 1-2, line 15 Please note that the BPA Substation and transmission lines are still in service with no intent to demolish.
2. Page 3-75 We believe item 37 is a transformer oil spill and not a dump site. See also Table 3-7.
3. Page 3-83 In item 10 the facility in the third column should be 1701-NE.
4. Page 3-93 The concrete and soil below the steam line trestle drains should also be listed.
5. Page 9-6, 9.2.4 The schedule should be flexible for the Supply System HGP activities.
6. Page 9-6 The Supply System will meet the training requirements with our own program.