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Department of Energy

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SEP 30 1994

94-RSD-026

Mr. Steve M. Alexander
Nuclear Waste Program
State of Washington State
Department of Ecology
1315 W. 4th Avenue
Kennewick, Washington 99336-6018



Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Messrs. Alexander and Sherwood:

TRANSMITTAL OF 100 AREA SOURCE AND GROUNDWATER OPERABLE UNIT (OU) FOCUSED FEASIBILITY STUDY (FFS) REPORTS

Enclosed are two copies each of the following FFS Reports for your review and comment:

- DOE/RL-94-64, 100-DR-1 Operable Unit Focused Feasibility Study Report, Draft A. ✓
- DOE/RL-94-63, 100-HR-1 Operable Unit Focused Feasibility Study Report, Draft A. 38422
- DOE/RL-94-67, 100-HR-3 Operable Unit Focused Feasibility Study Report, Draft A. 38530
- DOE-RL-94-61, 100 Area Source Operable Unit Feasibility Study Report, Draft A. 38378

These documents are being submitted in support of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestones M-15-07C, M-15-05D, and M-15-06C, respectively. Additional copies have been provided to your staff on September 27, 1994.

The 100-DR-1 and 100-HR-1 FFS Reports pertain to source area OUs and are companion reports to DOE-RL-94-61, 100 Area Source OU FFS Report, Draft A, also known as the "Process Document." The 100-HR-3 FFS Report pertains to the groundwater OU associated with the 100-H and 100-D/DR Areas. The FFS reports constitute the detailed analysis phase that completes the feasibility study evaluation for the targeted interim remedial measures (IRM). The detailed analysis phase integrates the results of limited field investigations and qualitative risk assessments as well as information from 100 Area-wide treatability studies.

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The Process Document describes all strategy and background details that are common to all 100 Area source OUs. In the document, the numerous waste sites in the 100 Area are first separated into "waste site groups." A detailed analysis phase is then implemented for the remedial alternatives that were developed based on characteristics of waste sites within a group. The results presented in the Process Document serve as a baseline for the evaluation of particular waste sites that are described in the attached 100-DR-1 and 100-HR-1 OU-specific FFS Reports. The analysis of waste sites within each source OU involves an evaluation of information particular to each waste site. If the characteristics of the site directly correlates with the applicable waste site group described in the Process Document, the site is evaluated within the Process Document. If correlation is not direct, then "deviations" are said to occur that are addressed in the OU-specific FFS report.

The objective of the FFS reports is to provide decision makers sufficient information on waste site conditions and remedial alternatives to allow them to make an appropriate and timely decision on remediation of sites to be addressed through IRMs.

In the 100-HR-3 OU FFS Report, it should be noted that hydraulic control in the D/DR Area is planned to be addressed as a general response action under "containment technologies." This alternative will be addressed by analytical approaches that may include computer modeling during the period of document review by the regulators. The results may be incorporated into the next revision of the document.

During preparation of the Process Document, several issues were identified for later incorporation into the document with regulator review/acceptance. A meeting to review these issues should be scheduled early in your review process. These issues are as follows:

- Various sections of the report discuss short-term risk levels for remediation workers in quantification terms, an approach consistent with Risk Evaluation of Remedial Alternatives for the Hanford Site (DOE/RL-93-54). The U.S. Department of Energy wishes to review quatification of some short-term risk levels to workers for inclusion in the document following regulatory review.
- Waste Site Groups will be screened with respect to 2-sigma background concentrations for radionuclides concurrent with the regulatory review process. Table A-3 has been added to Appendix A for this purpose. It will be productive to obtain agreement among the Tri-Parties on background concentrations for the inorganic and radionuclide constituents prior to the next document revision.
- Additional DOE comments concerning Natural Resource Criteria for Alternatives Analysis, preliminary remediation goals, cost estimates, combinations of alternatives, National Environmental Policy Act and remedial action objective presentation still need to be addressed.

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- A Sensitivity Analysis will assess the feasibility and costs of remedial alternatives for a residential-based exposure scenario and then compare to the current recreational-based exposure scenario. The analysis will be focused on several waste site groups and is scheduled for completion in late October 1994.

A 45-day review cycle is given for regulatory review of these documents, commencing with the Tri-Party Agreement milestone date on September 30, 1994, and ending with written comments due on November 14, 1994.

If you have any questions, please contact the individual Project Managers, K. Michael Thompson on 373-0750 (100-HR-3) or Nancy Werdel on 376-5500 (100-HR-1 and 100-DR-1).

Sincerely,

Robert G. Holt

Robert G. Holt
Acting Hanford Project Manager

RSD:NAW

Enclosures

cc w/o encls:

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Administrative Record

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