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0020307

February 25, 1992

Meeting Minutes Transmittal/Approval
100 Area Field Activities
450 Hills Street, Richland, Washington
January 23, 1992

From/ Appvl.: Eric Goller Date: 1-27-92
Eric Goller, Unit Manager, RL (A5-19)

Appvl.: Charles J. Deane for LG Date: 2/27/92
Larry Goldstein, 100-HR-1/BC-1/BC-5/NR-1/KR-1 Unit Manager, WA
Department of Ecology

Appvl.: Douglas R. Sherwood for Date: 2-27-92
Douglas R. Sherwood, 100-HR-1/HR-3/DR-1/BC-1/BC-5 Unit Manager,
EPA (B5-01)

Meeting Minutes are attached. Minutes are comprised of the following:

- Attachment #1 - Meeting Summary/Summary of Commitments and Agreements
- Attachment #2 - Agenda
- Attachment #3 - Attendance List
- Attachment #4 - Commitments/Agreements Status List
- Attachment #5 - 100-N Operational Environmental Monitoring
- Attachment #6 - N-Springs IRM

Prepared by: A. K. Erickson Date: 3-6-92
SWEC Support Services

Concurrence by: A. E. King Date: 2/27/92
WHC Coordinator



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Attachment #1

Meeting and Summary of Commitments and Agreements

100 Area Field Activities January 23, 1992

1. The meeting was called to order by Jim Goodenough (RL). He introduced Stephen Warren (DOE/HQ) who was representing Environmental Management 4.2, Dave Watson (WHC) from the N-Area Operations Environmental Group, and Ron Lerch from the Westinghouse Environmental Group. Mr. Goodenough announced the postponement of the discussion of feasibility studies and treatability studies to a future unit managers meeting.
2. Ted Poston (PNL) presented an overview of the analysis of vegetation that was collected along the N-Springs shoreline of the Columbia River. Analyses of soils in the N-Springs area and sediments from the river adjacent to the N-Reactor site were also presented. Mr. Poston explained that Battelle (PNL) samples and analyzes environmental media for radionuclides and chemicals. The accumulated data is then used in the assessment of the environment and in the estimation of human dose and exposure. The Battelle area of responsibility includes all of the Hanford Site outside the boundaries of formal operable units.
3. Larry Goldstein (Ecology) requested the entire data package on the vegetation studies, including QA/QC documentation *be submitted to Ecology*. Mr. Goldstein asked that DOE direct PNL to add beaver to the current test list for fish and wildlife studies. Darci Teel (Ecology) suggested that porcupine should also be considered as a potential candidate for future study. Mr. Poston stated that the 1990 annual environmental report will document cesium levels in the muscle and strontium levels in bone from rabbits collected in the 100 Area.
4. Aquatic biota currently under study include fish, crayfish and clams. Tissues sampled include fillets, tail meat and flesh respectively. The results of all analyses to date indicate that cobalt 60 and cesium 137 were at or near the detection limits.
5. A cesium 137 spike that occurred in 1987 in fish fillets and carcasses is attributed to the Chernoble event in Ukraine. At the same time cesium 137 was measured at the detection limit in clam flesh.
6. Studies are also in progress on deer antler, Columbia River sturgeon, and shoreline vegetation. The analysis is done by International Technology Corp. (IT). Their analysts are trained in the analysis of all media. The entire QA/QC process from sampling through chain-of-custody and analytical methods is documented.
7. Darci Teel (Ecology) asked when the data would be input to the Hanford Environmental Information System (HEIS) and requested a formal transfer of data to Ecology when it becomes available. Mr. Poston explained that PNL and Battelle issue both quarterly and annual reports of investigations. Ms. Teel asked how PNL and Battelle transfer data to

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WHC. Jim Goodenough explained that data requested by WHC is forwarded as it becomes available; and further, that DOE Orders direct the flow of investigative data relative to regulatory requirements.

8. John Dorian (WHC) gave a presentation on 100-N Area operational environmental monitoring. He stated that effluent release reports are issued on an annual basis. In 1988 there were 25 active seeps at N-Springs. A concrete cap and two additional inches of rock fill were emplaced on the 1301 crib. By 1989 the number of active seeps had declined to five. By 1990 the average annual concentrations of strontium 90 was 0.025 mRem. PNL collects samples both upstream and downstream from the N-Reactor site. A reading of 0.07 picocuries was measured upstream at Priest Rapids Dam and 0.07 picocuries was measured downstream at the Richland City water intake. This is substantially below acceptable limits since the DOE standard dose is 100 mRem per year of strontium 90 for an adult human. The total release of radiation, for all radioisotopes, to the Columbia River pathway was 8.6 curies per year in 1985. As a result of decreasing contaminant flow rates these levels dropped to about one curie by 1991.
9. Larry Goldstein requested a definition of the term "routine" with respect to the sampling frequency for N-Springs vegetation. Mr. Dorian said that typically along that location "routine" means annual.

Action Item: #1AAMS.5: Ecology and EPA are to be provided with sampling data on mulberries from N-Springs as well as data from the vegetation eradication program. The specific herbicides that were used are to be included. Action: T. Poston and J. Goodenough.

10. Jim Goodenough said that *RL and WHC need to decide whether an emergency response is warranted* at N-Springs. Alan Krug (WHC) explained that Westinghouse is considering an interim remedial measure (IRM) under RCRA for the remediation of radiation occurring in the soils. The proposed three step process is detailed in Attachment #6. A Limited Field Investigation (LFI) may be conducted to support an IRM if existing data proves to be inadequate. The results of this report could lead to near term bench scale studies for the remediation of radioactive contaminants in the soils. The 100 Area feasibility studies are currently under way at Westinghouse. River impact studies and risk assessment studies are also in progress. The IRM strategy being *proposed is consistent with the Hanford Past Practice Investigative Strategy as prepared by Mike Thompson (RL) with consultation from Jerry Chiaramonte of IT and Lonie Swenson of Golder.*
11. The parties agreed that it would be expedient to evaluate all existing data prior to the commencement of the development of a formal work plan for an IRM for the remediation of 100 Area soils.

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Action Item #1AAMS.6: The N-Springs IRM program is to be reviewed and comments and recommendations are to be made to RL by 1/31/92. Action: L. Goldstein.

12. Doug Sherwood (EPA) recommended that strontium 90 be focused on as the contaminant of concern at N-Springs. The IRM should have cleanup levels written into it. It may not be possible to *achieve* drinking water standards as *cleanup levels* for Strontium 90; therefore, a waiver *may* be in order. This problem would be addressed in an IRM and a record of decision. In any case, this pathway to the environment needs to be mitigated and an IRM would accomplish that purpose.
13. Jim Goodenough said that RL and Westinghouse share the concern of EPA and Ecology on the N-Springs issue. All parties agree that a *formal decision on the appropriate action needs to be made*. The RL goal is that *any corrective measures taken must* be done correctly, effectively, and efficiently.

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Attachment #2

Agenda

100 Area Field Activities
January 23, 1992

100 Area OU Activities

Agreement on Format/Content of DOWs (Description of Work)

Discussion on 100 Area FS, Treatability Studies, and Status of Planning

Discussion on Mulberry Bush Sampling

Discussion on N-Springs ERA

100 and 200 Areas Activities Update

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Attachment #3

Attendance List

100 Area Field Activities
January 23, 1992

| Name | Organization\Responsibility | Phone |
|------------------------|-----------------------------|------------------|
| Goller, Eric | DOE-RL | GW OU Manager |
| Goodenough, Jim | DOE-RL | 100 Areas O.U. |
| Trumble, Heather | DOE-RL | N-Reactor |
| Hibbard, Rich | Ecology | Unit Support |
| Cline, Chuck | Ecology | OU Manager |
| Teel, Darci | Ecology | OU Manager |
| Goldstein, Larry | Ecology | CERCLA Mgr |
| Mauss, Billie | Ecology | CERCLA |
| Sprecher, Jon | B&L | Ecology Support |
| Sherwood, Doug | EPA | Unit Manager |
| Faulk, Dennis | EPA | Unit Manager |
| Drost, Brian | USGS | EPA Support |
| Baehre, Mike | USACE | 100-N |
| Poston, Ted | PNL | SESP Overview |
| Ayres, Jeff | WHC | 100-HR-1 |
| Day, Roberta | WHC | 100-BC-1 |
| Krug, Alan D. | WHC | 100 HID Areas |
| Lauterbach, Merl | WHC | Env. Engr. |
| Hunacek, Jerry | WHC | N Reactor |
| Gano, Ken | WHC | 100 Area EP |
| Perkins, Craig | WHC | 100-N |
| Pool, Karl N. | WHC | OSM |
| Weiss, Steve | WHC | 100 Agg Area |
| Green, Bill | WHC | NR-1, KR-1, FR-1 |
| Watson, David J. | WHC | N Reactor |
| Washington, Theodore X | WHC | OSM |
| Lerch, R.E. | WHC | Env. Div. |
| Patterson, M. J. | WHC | ER Prog. Officer |
| O'Brien, Don | Weston | DOE-HQ Support |
| Warren, Stephen | EM-442 | Proj. Manager |
| McClung, Bill | SWEC | GSSC |
| Fryer, Bill | SWEC | GSSC |
| Bartz, Joan K. | CNES | GSSC |

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Attachment #4

Commitments/Agreements Status List

100 Area Field Activities
January 23, 1992

| Item No. | Action | Status |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| IHR1.28 | Determine when the topographic mapping will be available on HEIS, who is responsible for digitizing the mapping, and when it will be available. Action: Alan Krug (11/15/90) | Open: Remains open on the question of when the data will be in HEIS. (7/18/91) |
| IHR3.29 | Provide regulators with information about the situation concerning the cooling-water discharge pipeline/vent pipes on the island opposite D reactor. Action: Jim Goodenough (11/15/90) | Open: WHC sent a letter to DOE requesting guidance on the extent of NEPA documentation required and is awaiting DOE's response. (7/18/91) |
| IHR3.32 | Regarding the removal of the vent pipes, WHC will: 1) Determine the need for an ACE permit; 2) obtain a letter from ACE that gives approval to begin work before the need for the permit is determined; and, 3) draft letters on the matter to the Natural Resources Trustees. Action: A. Krug (1/15/90) | Open: Pending overall resolution (7/18/91) |
| INR.3 | Provide to Ecology (and EPA if desired) the DOE guidance documents that are needed. Action: Larry Goldstein (7/18/91) | Open: Larry Goldstein will send a letter specifying exactly what supporting documents Ecology would like to receive. (7/18/91) |
| IAAMS.1 | The 100 Area schedule assumptions presented by Merl Lauterbach are to be discussed with the regulators and resolved. Action: Doug Sherwood, Larry Goldstein, Mike Thompson (9/19/91) | Open |

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Attachment #4
Page 2 of 2

- IAAMS.2 WHC, DOE and the regulators are to meet to resolve questions on the 100 Area investigations. Topics to be discussed include geophysical logging, physical testing, archiving of "hot" samples, aquifer testing, etc. This meeting is tentatively scheduled for November 26, 1991. Action: Merl Lauterbach (11/21/91) Open
- IAAMS.3 Clarify the level above which RAD samples can not be shipped off site. Action: DOE (12/17/91) Open
- IAAMS.4 Provide a plan for incorporating the comments of EPA and Ecology into the work plans. Action: RL (12/17/91) Open
- IAAMS.5 Ecology and EPA are to be provided with sampling data on mulberries from N-Springs as well as data from the vegetation eradication program. The specific herbicides that were used are to be included. Action: T. Poston and J. Goodenough. (1/23/91) Open
- IAAMS.6 The N-Springs IRM program is to be reviewed and comments and recommendations are to be made to RL by 1/31/92. Action: L. Goldstein. (1/23/91) Open

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Attachment #5

Handout

100 Area Field Activities
January 23, 1992

100-N Operational Environmental Monitoring

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100-N

**OPERATIONAL ENVIRONMENTAL
MONITORING**

J. J. Dorian 1/92

HANFORD SITE ENVIRONMENTAL MONITORING PLAN

- **DOE/RL 91-50 ISSUED NOVEMBER 9, 1991**
- **ENVIRONMENTAL MONITORING RATIONALE AND DESIGN CRITERIA**
- **EFFLUENT MONITORING (INCLUDES EFFLUENT-RELATED OPERATIONAL ENVIRONMENTAL MONITORING)**
- **SITE-WIDE AND OFF-SITE ENVIRONMENTAL SURVEILLANCE**

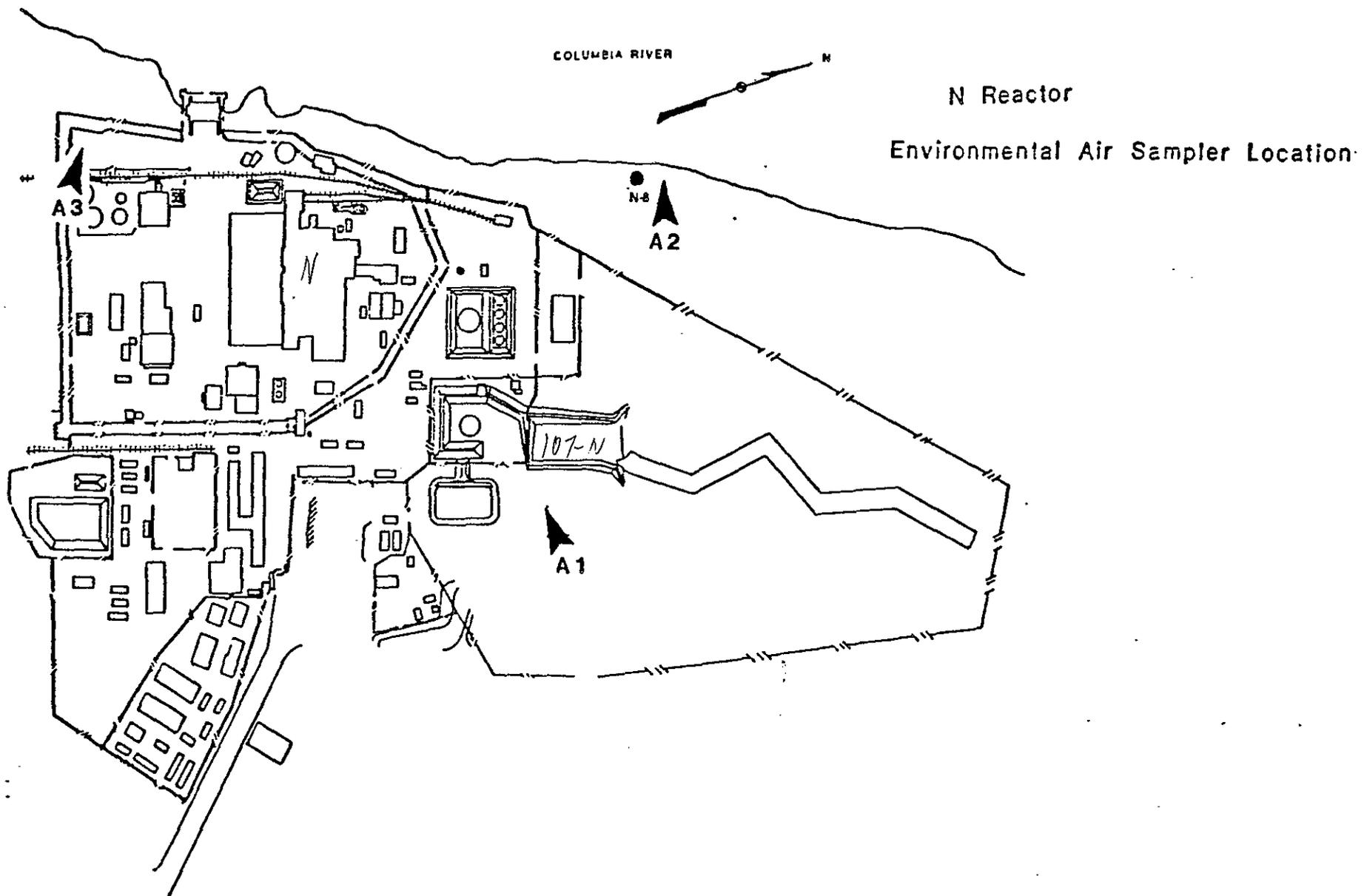
PROGRAM SCOPE

- AMBIENT AIR
- EXTERNAL RADIATION
- N-SPRINGS SEEPAGE
- SOIL AND VEGETATION
- RADIOLOGICAL SURVEYS *GM Probe*
- GROUNDWATER
- LWDF SEDIMENTS

AMBIENT AIR MONITORING

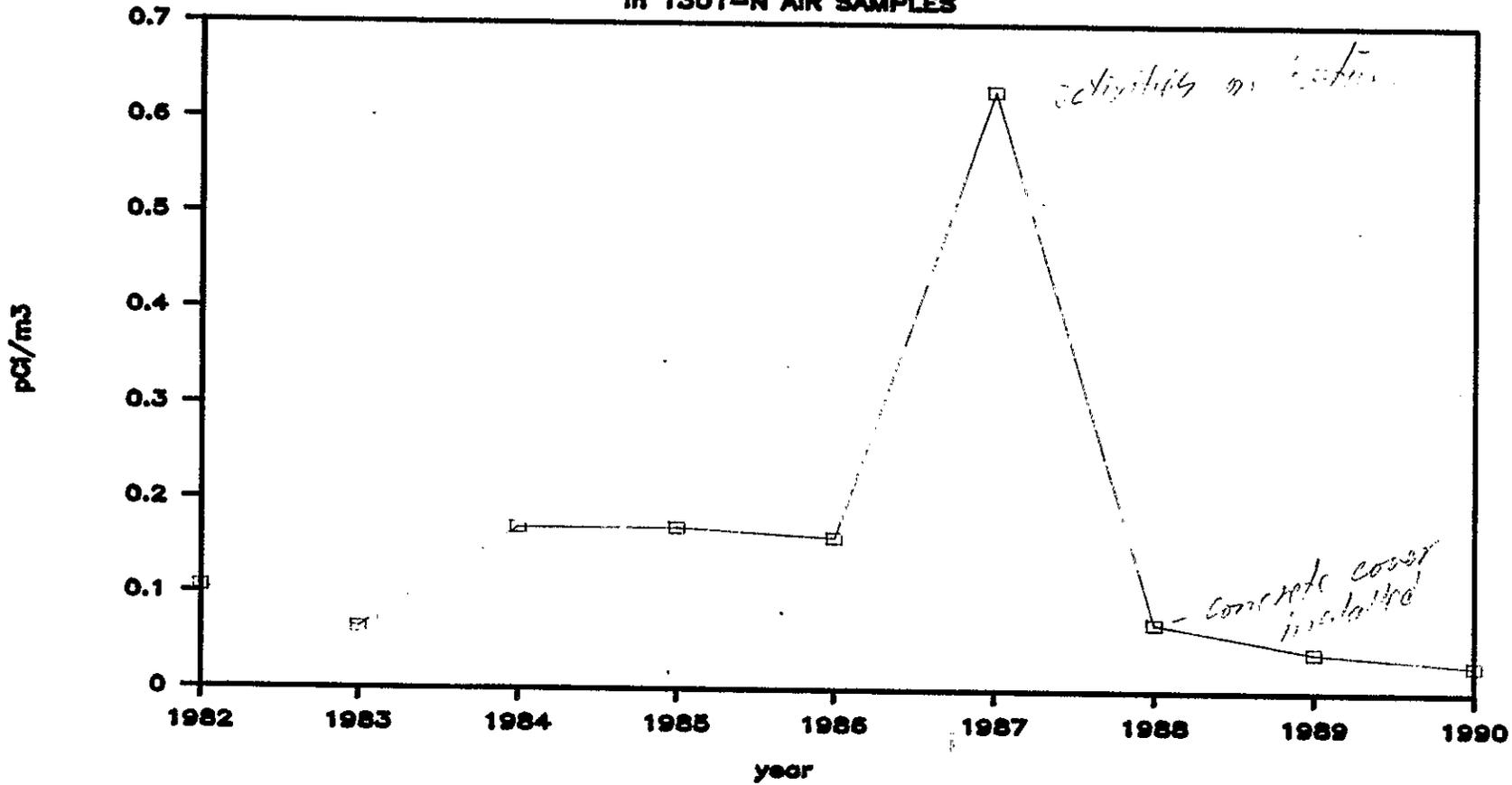
- 4 LOCATIONS AT 100-N
- Co-60 ONLY DETECTABLE RADIONUCLIDE
very low levels
- 2-3 ORDERS OF MAGNITUDE < DCG
- Co-60 DCG IS 80 pCi/m³

derived from concentration guides



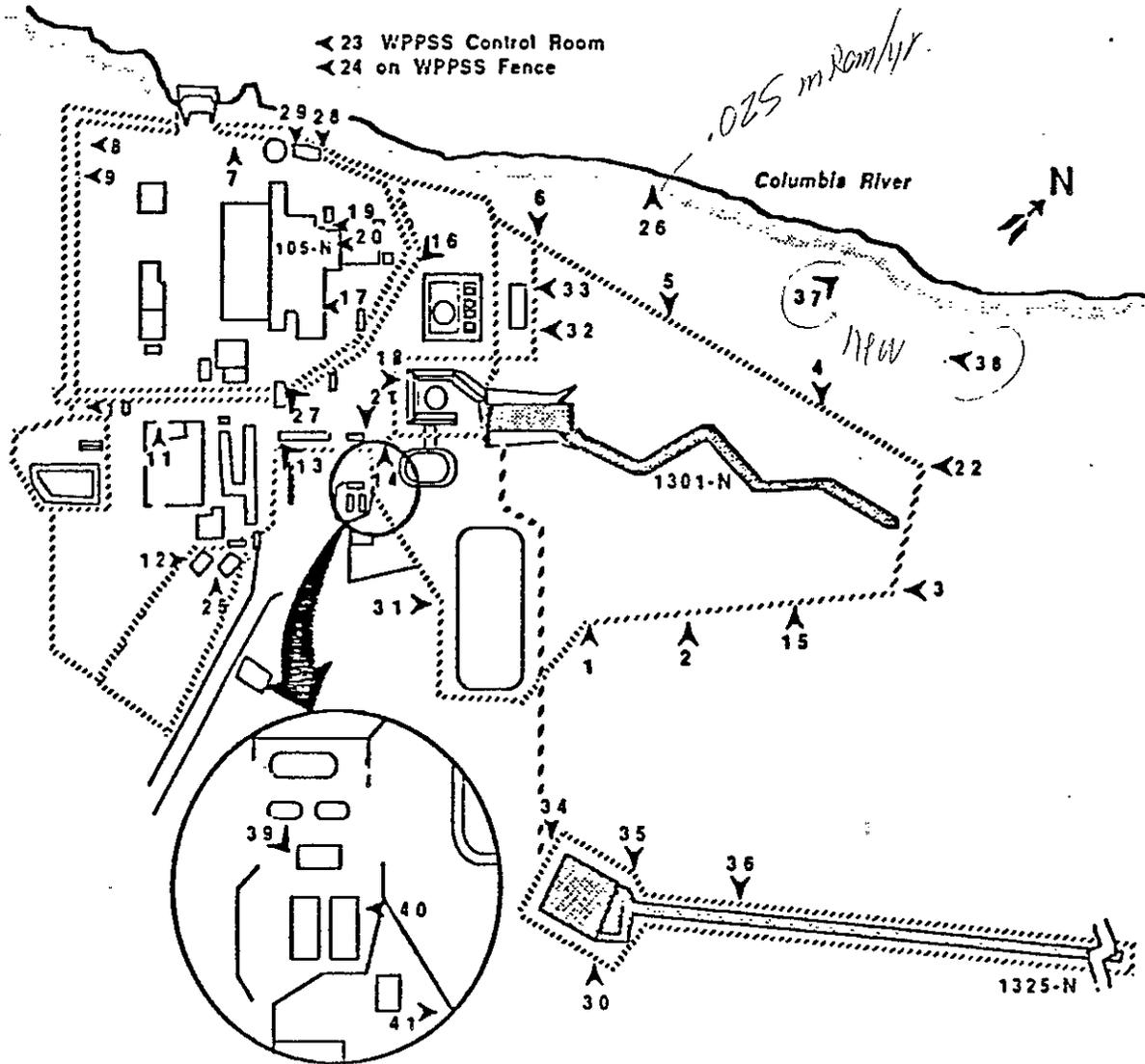
DCG - 7500 MB

AVERAGE CONCENTRATIONS of Co-60 in 1301-N AIR SAMPLES



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Location of Environmental Dosimeters at 100-N Area



Legend

-  Active Liquid Waste Site
-  Inactive Liquid Waste Site
-  Fence

36805-147.24M

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EXTERNAL RADIATION MONITORING
1990

- **1301-N DOSE RATES INCREASE 45%**
- **1325-N DOSE RATES INCREASE 400%**
- **GENERAL AREA DOSE RATES DOWN 10%**

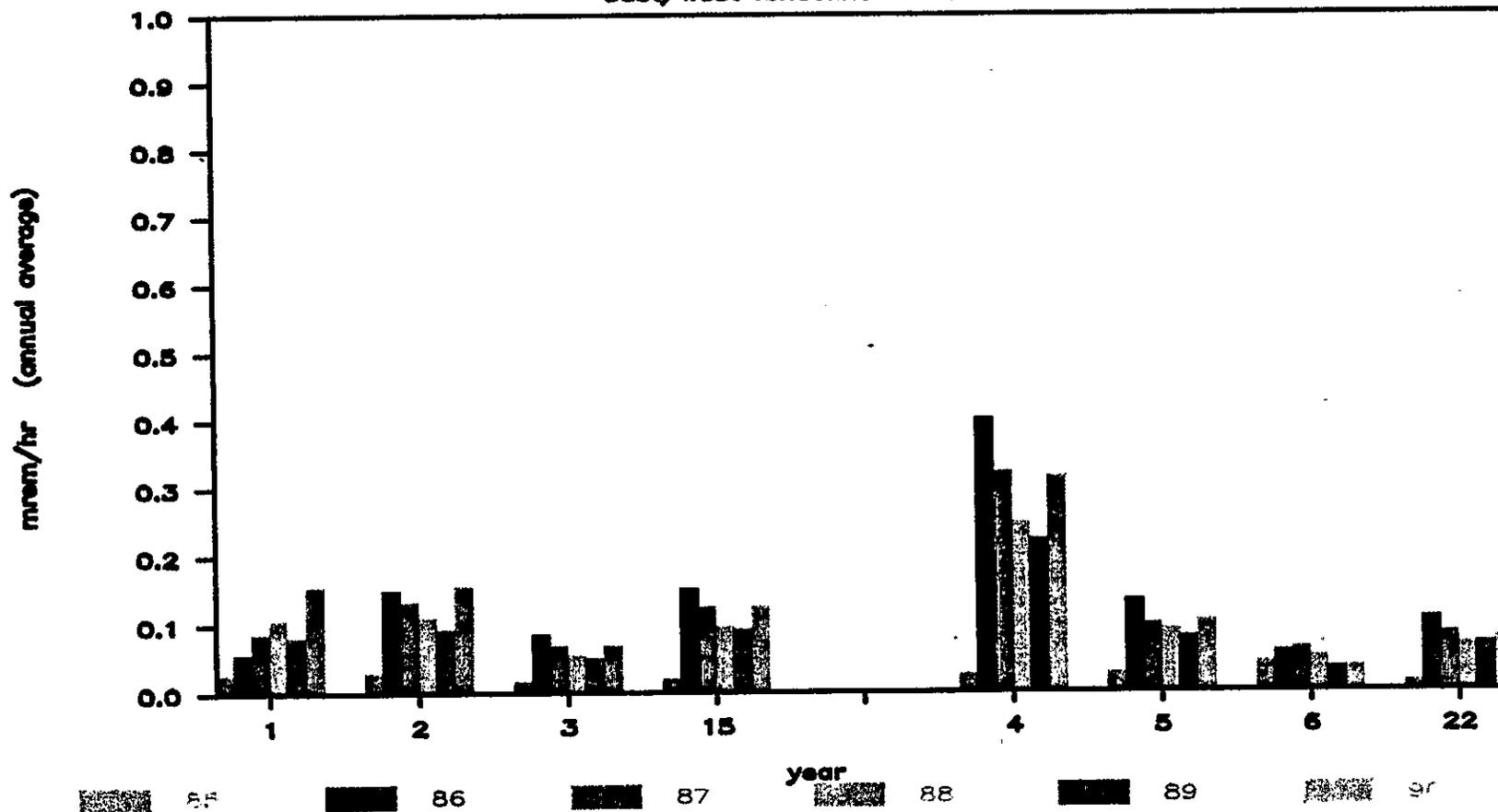
- TLD's

- shielding wa for 1325-N

60Co

1301-N TLD RESULTS

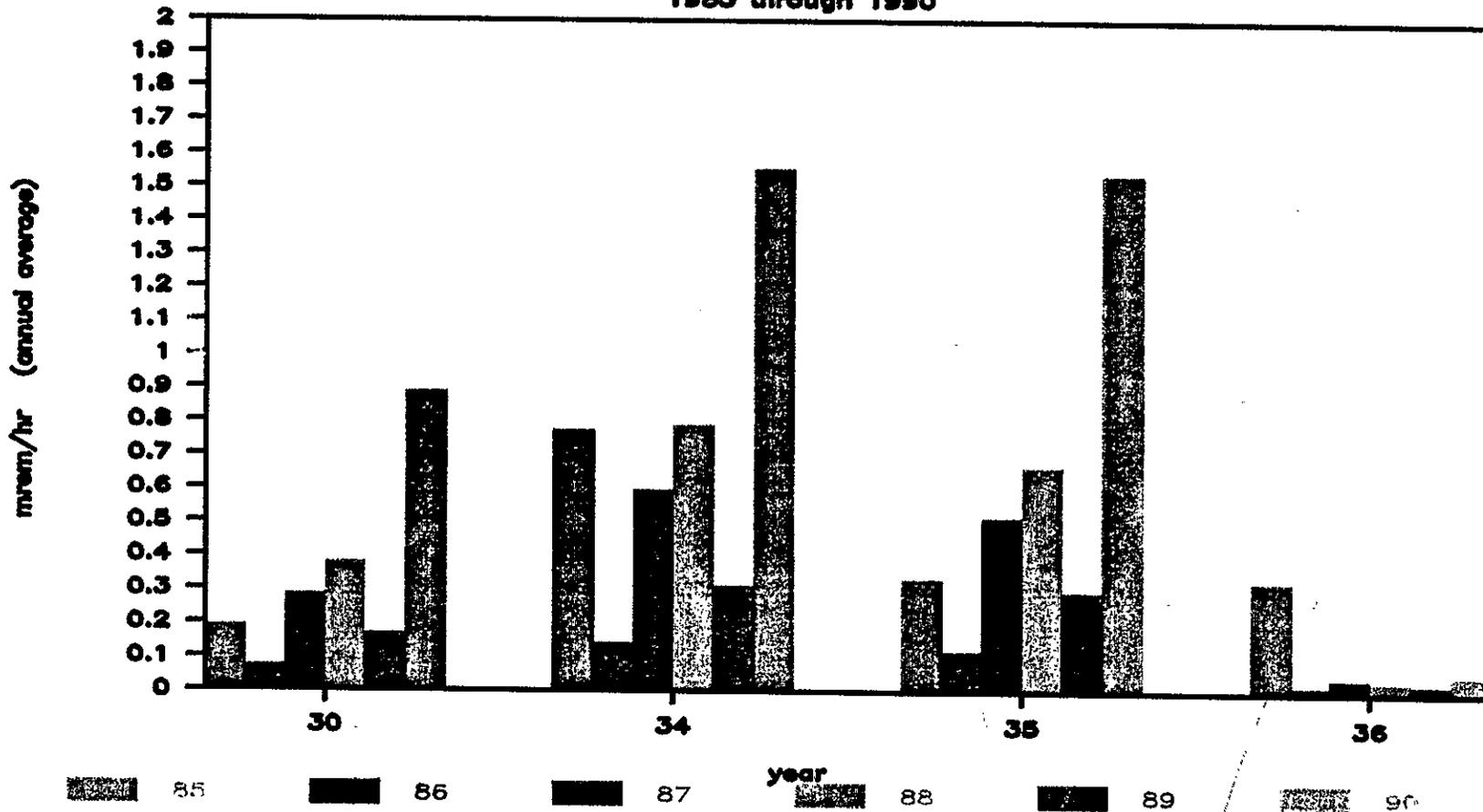
east/west fence line locations



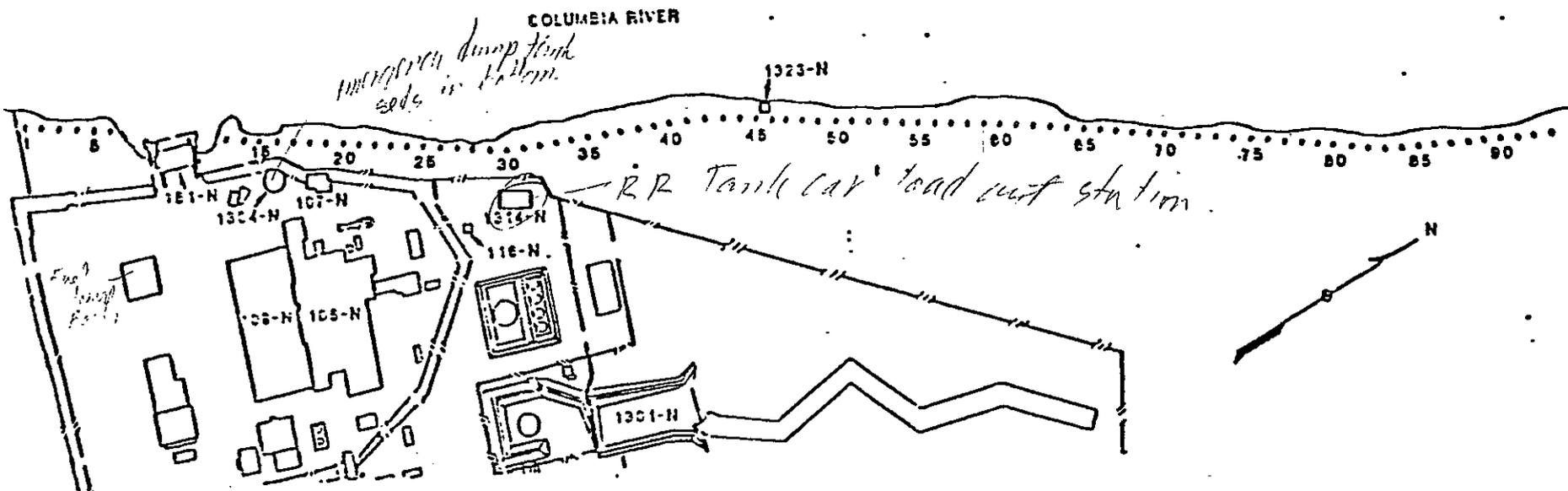
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1325-N TLD RESULTS

1985 through 1990



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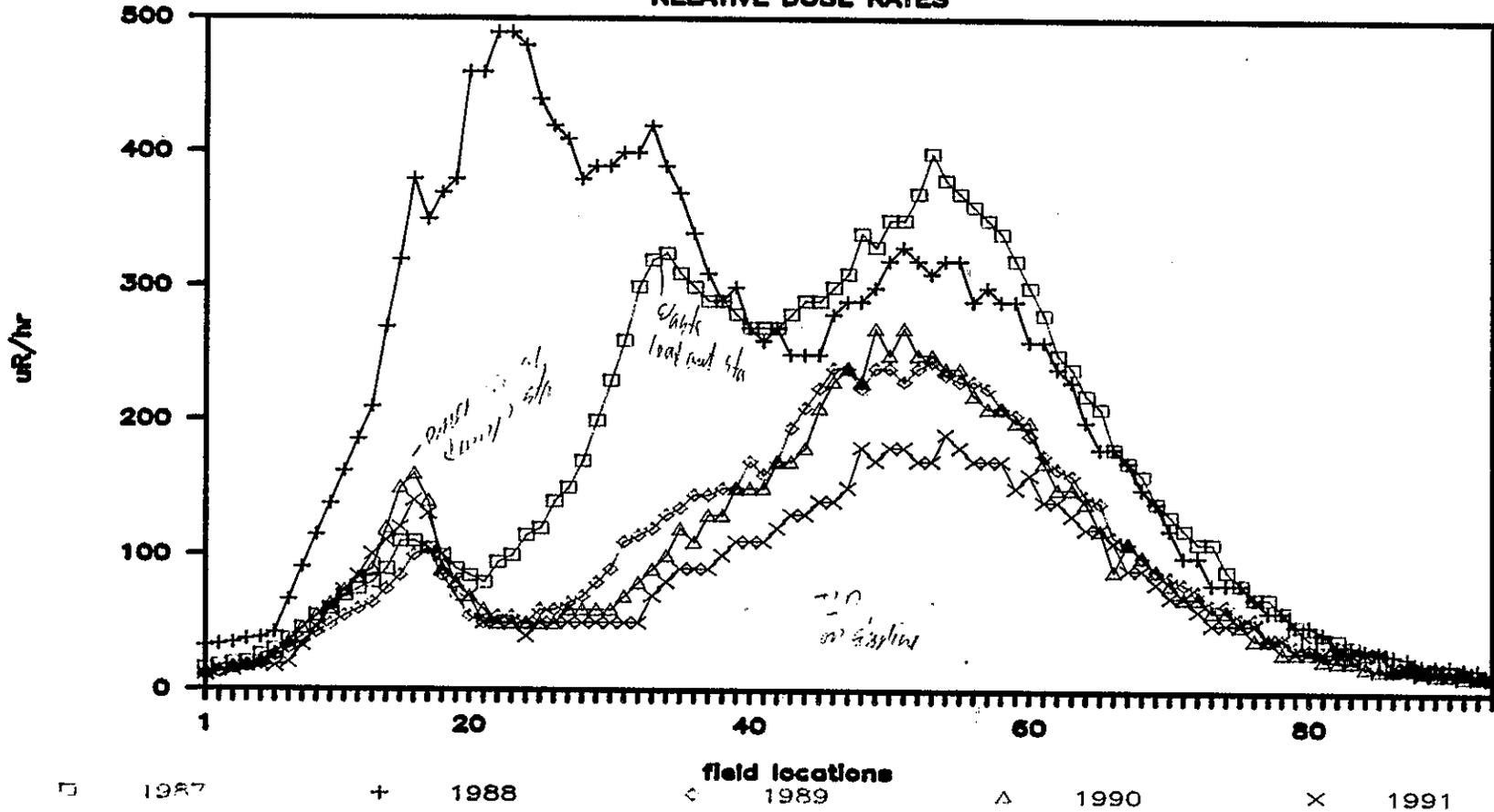


ENVIRONMENTAL DOSE RATE SURVEY LOCATIONS -- N-SPRINGS
(50' intervals)

9 2 1 2 5 0 1 2 0 4 2

100-N AREA SHORELINE SURVEY RESULTS

RELATIVE DOSE RATES



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N-SPRINGS SEEPAGE SAMPLING

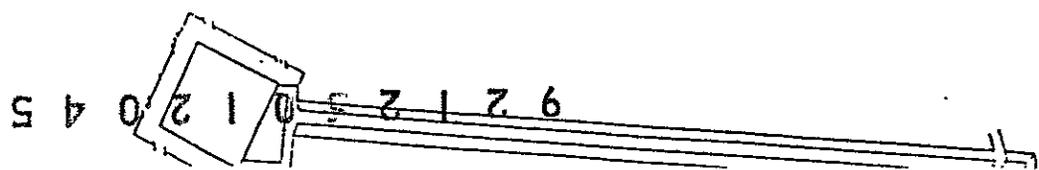
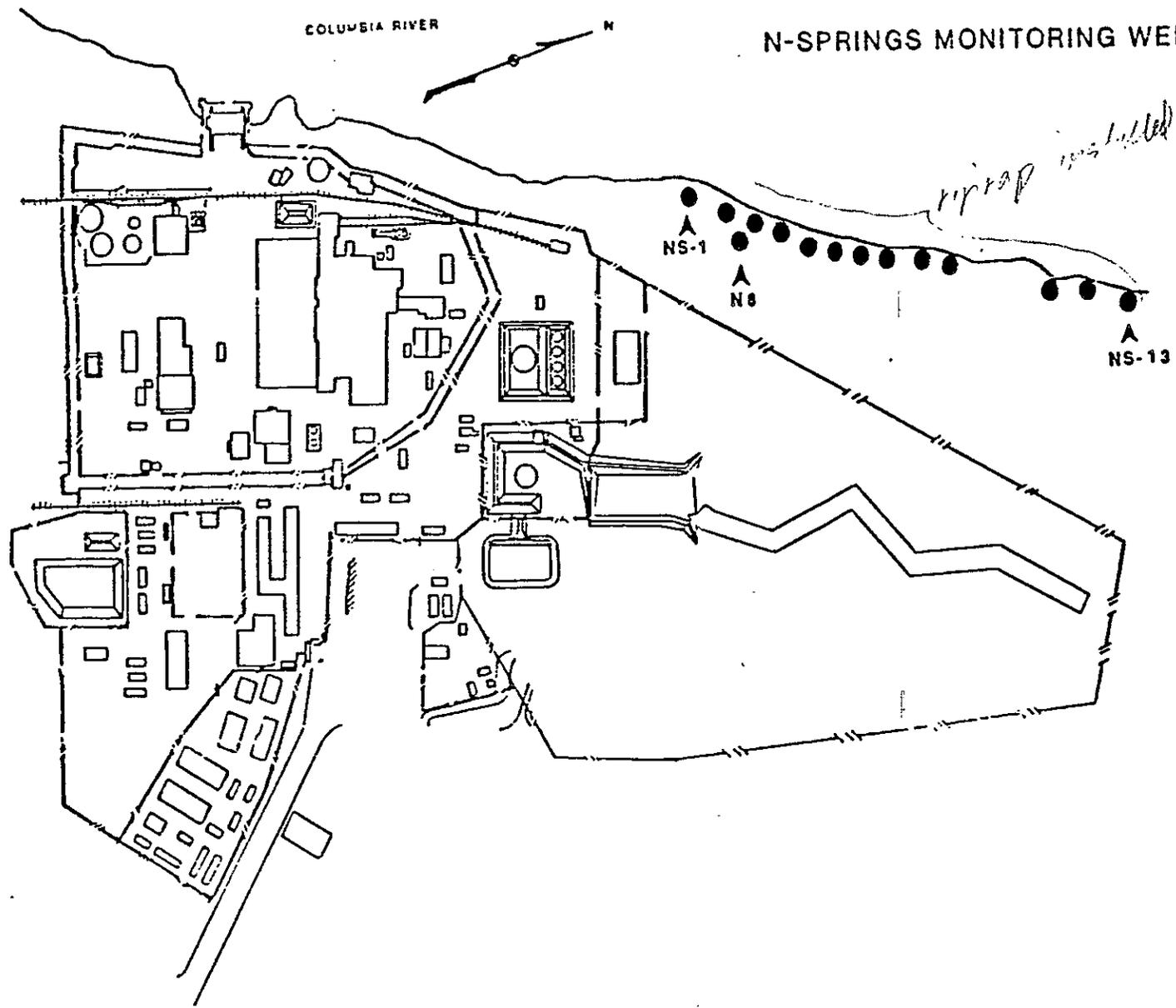
- SEEPS REDUCED IN VOLUME AND NUMBER

- Sr-90 ABOVE DCG VALUES

- Sr-90 DCG = 1,000 pCi/l

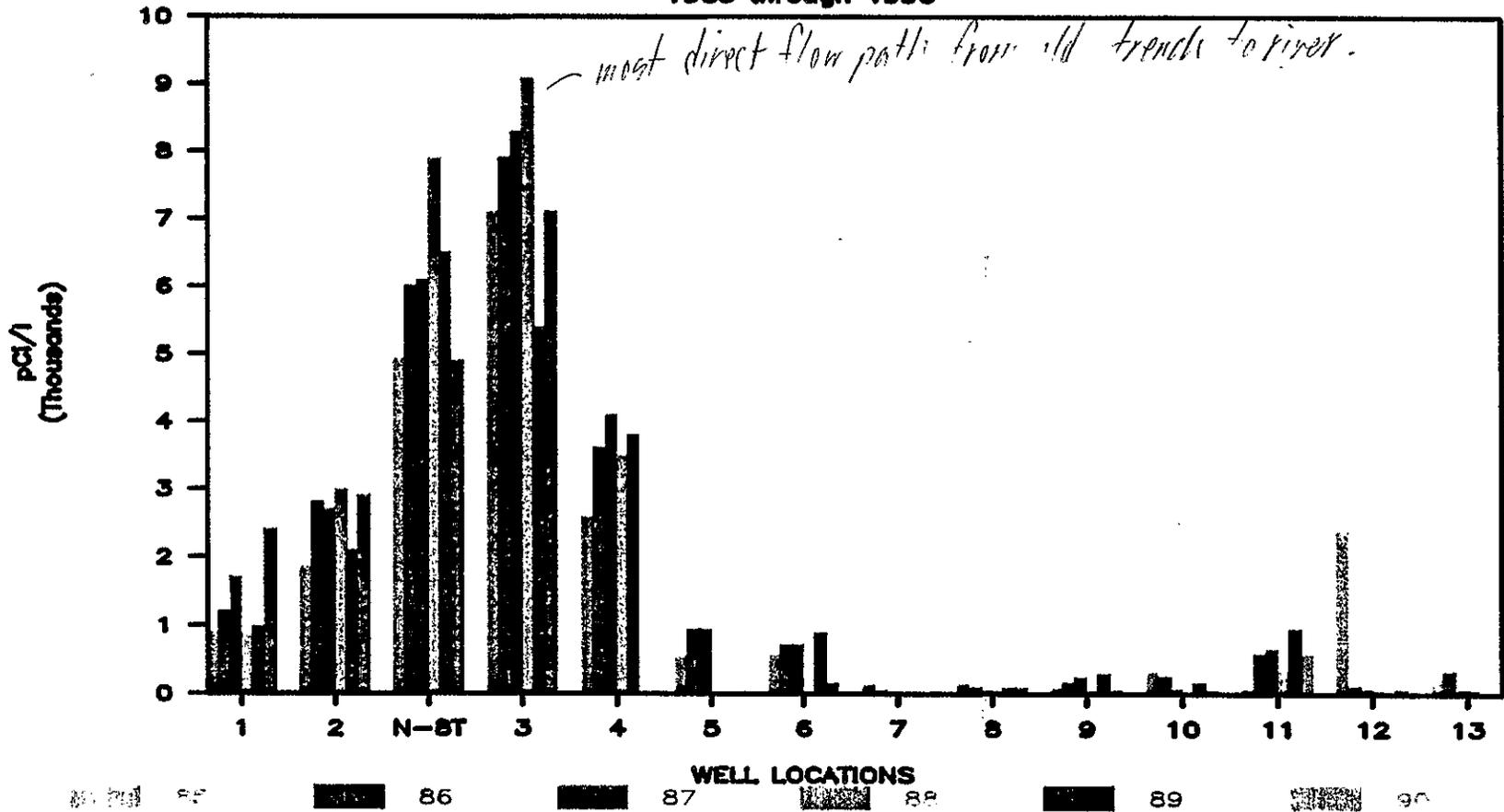
≈ 100 mRms to a person
who drinks 2 liters per day
for one year.

N REACTOR N-SPRINGS MONITORING WELL LOCATIONS



Sr-90 CONCENTRATIONS IN N-SPRINGS WELLS

1985 through 1990



S. K. (01/10)

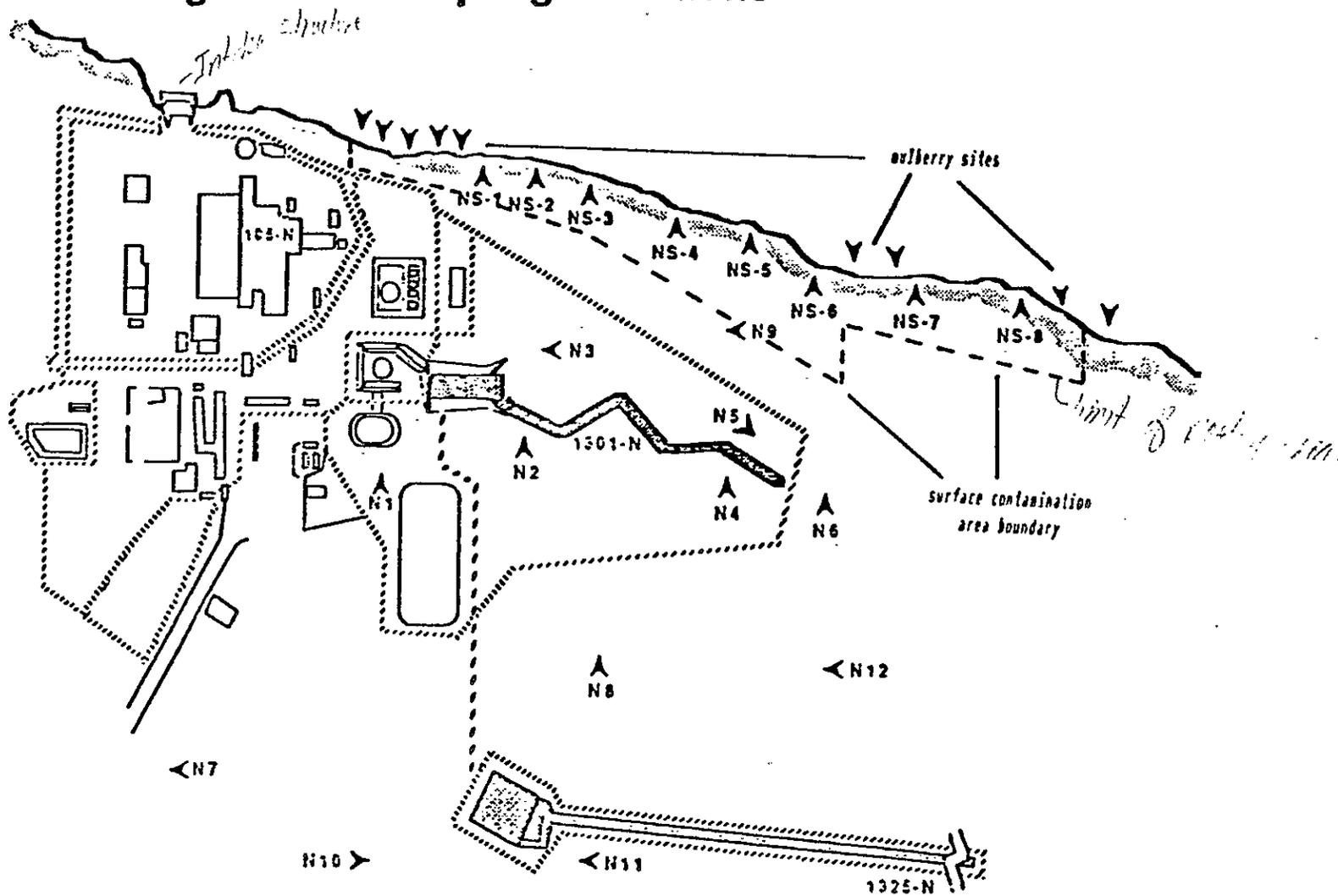
21
Laurie

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AVERAGE RADIONUCLIDE CONCENTRATIONS
IN SOIL (pCi/g) - 1990
100 N-AREA

| | <u>Sr-90</u> | <u>Pu-239/240</u> |
|------------------------|---------------------|--------------------------|
| 100-N | 2.0E-01 | 2.0E-02 |
| HANFORD AVERAGE | 2.3E-01 | 5.1E-02 |
| OFFSITE | 1.3E-01 | 1.3E-02 |

100-N Vegetation Sampling Locations



SEEC5-147.05M

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N-SPRINGS GRASSES SAMPLED
SINCE 1982

RANGE OF MAXIMUM Sr-90 CONCENTRATIONS
IS 330 TO 870 pCi/g

AVERAGE RADIONUCLIDE CONCENTRATIONS
IN VEGETATION (pCi/g)
100 N-AREA

| | <u>Sr-90</u> | <u>Pu-239/240</u> |
|------------------------------|--------------|-------------------|
| 100-N (1990) | 1.9E-02 | 5.6E-04 |
| N-SPRINGS (1989) <i>1995</i> | 8.0E + 01 | 4.0E-04 |
| HANFORD AVERAGE | 1.2E-02 | 1.0E-03 |
| OFFSITE AVERAGE | 5.2E-02 | 1.0E-04 |

DETAILED SURVEY OF SHORELINE
AUGUST 8, 1990

- **ABOUT 12 LOCATIONS WITH CONTAMINATED MULBERRY TREES/BUSHES - RANGING 300 - 1,400 cpm** *gm gamma & beta*
- **PNL SAMPLED VEGETATION DURING THIS PERIOD**
- **LOCATIONS MARKED AND AREA POSTED AS RADIATION AREA (SURFACE CONTAMINATION)**

DETAILED SURVEY OF SHORELINE
DECEMBER 1991

- **37 LOCATIONS WITH CONTAMINATED MULBERRY TREES/BUSHES - RANGING 100 - 2,500 cpm** *9.17 probe*
- **LOCATIONS MARKED AND AREA POSTED AS RADIATION AREA (SURFACE CONTAMINATION)**
- **DEEP-ROOTED VEGETATION (SAGEBRUSH) CONTAMINATED 150-400 cpm**

MULBERRY SAMPLING
DECEMBER 1991

- **9 TREES SAMPLED**
- **TRUNK CORE AND LIMB SAMPLES COLLECTED FROM EACH TREE**
- **FURTHEST UPSTREAM AND DOWNSTREAM TREES -
- "CLEAN" (TO MONITOR ANY FUTURE PLUME SHIFT)**
- **ANALYZED FOR GAMMA-EMITTERS AND Sr-90 (PARTIAL RETURN ON GAMMAS ONLY)**
- **CHAIN-OF-CUSTODY PROTOCOL FOLLOWED**

CORRECTIVE ACTIONS
N-SPRINGS SHORELINE

1990 & 1991

- **REMOVAL OF MULBERRY TREES AND SHRUBS**
- **REMOVAL OF OTHER CONTAMINATED VEGETATION**
- **HERBICIDE APPLICATION (RODEO) TO TREE STUMPS AND EMERGING VEGETATION**

CORRECTIVE ACTIONS
1301-N LIQUID WASTE DISPOSAL FACILITY

| <u>YEAR</u> | <u>ACTION</u> |
|--------------------|---------------------------------------------------------------------------|
| 1970 | SCREEN COVER (2" X 4" MESH) |
| 1976 | 7 FT. CHAIN LINK FENCE |
| 1980 | FORMAL 100-N NEAR-FIELD ENVIRONMENTAL SURVEILLANCE PROGRAM |
| 1982 | CONCRETE TRENCH COVER <i>#1,000,000.00</i> |
| 1984 | N-SPRINGS RIP-RAP COVER <i>\$200,000.00</i> |
| 1985 | DISCONTINUED USE OF 1301-N LWDF |
| 1988 | ADDITIONAL ROCK FILL OVER CRIB |
| 1990-1991 | MULBERRY TREE SAMPLING/REMOVAL AND HERBICIDE APPLICATIONS ALONG N-SPRINGS |
| PLANNED | FACILITY CLOSURE PLANS |

ENVIRONMENTAL BIBLIOGRAPHY FOR 100 AREAS

- WHC ANNUAL EFFLUENT RELEASE REPORTS
- WHC ANNUAL ENVIRONMENTAL SURVEILLANCE REPORTS
- WHC N-SPRINGS CHARACTERIZATION REPORTS
- RADIOLOGICAL CHARACTERIZATION OF "SKYSHINE" FROM A RETIRED, LOW-LEVEL, RADIOACTIVE LIQUID EFFLUENT DISPOSAL FACILITY AT HANFORD (1301-N) (WHC-SA-0089-FP, BROWN & PERKINS)
- 1301-N SHORELINE DOSE REDUCTION STUDY (WHC-SD-NR-ES, REV. 0)
- UPTAKE OF GAMMA-EMITTING RADIONUCLIDES BY TOMATO PLANTS FROM LOW-LEVEL RADIOACTIVE WASTE PASSED THROUGH SOIL (UNI-TH-2, GREAGER)

Attachment #6

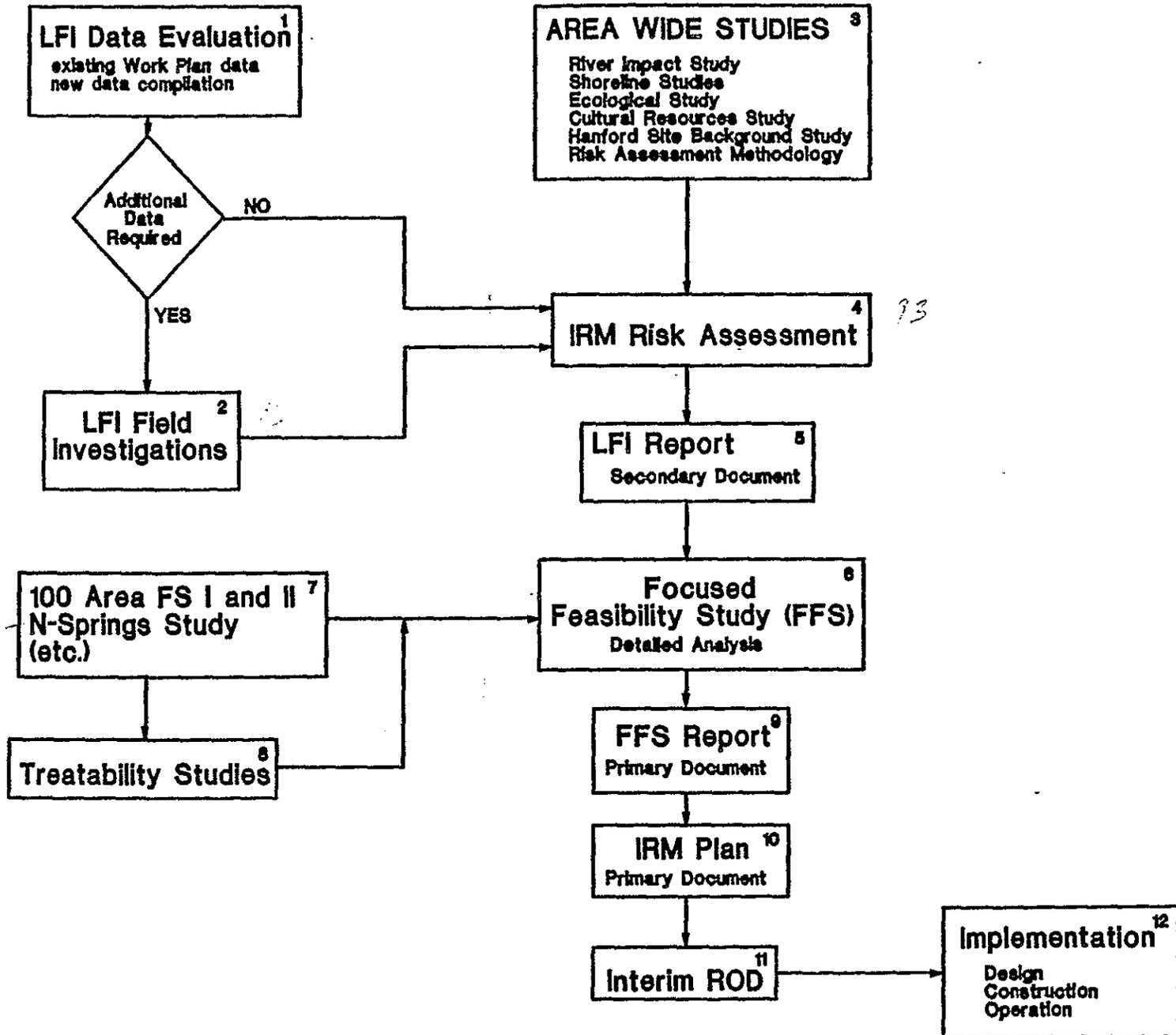
Handout

100 Area Field Activities
January 23, 1992

N-Springs IRM

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Handwritten notes:
10-9-2008



Handwritten notes:
10-9-2008

For the N-Springs it is anticipated that only a cursory LFI Data Evaluation stage will be required before advancing to the IRM risk assessment stage (stage 4). There is currently a considerable amount of information on the N-Springs. The quality and quantity of this information may satisfy LFI requirements, making it possible to rapidly proceed through LFI Data Evaluation to the stage 4 risk assessment.

1. LIMITED FIELD INVESTIGATION (LFI) DATA EVALUATION: This is a data collection/characterization activity and consists of a review of information collected to prepare the N-Area work plans, and an evaluation of new data from the Data Compilation Task and current environmental monitoring efforts. This review and evaluation is intended to identify any data gaps that will require additional non-intrusive and/or intrusive investigations. The LFI, along with data from the Area Wide Studies and the IRM risk assessment, is documented in the LFI Report, a secondary document.
2. LFI FIELD INVESTIGATIONS: The need for and scope of any non-intrusive and/or intrusive field investigations will be determined by the evaluation of existing information. This step includes the conduct of field investigations. Specifics regarding field investigative activities will appear in a description of work (DOW). Results are documented in the LFI Report.
3. AREA WIDE STUDIES: The Area Wide Studies consist of a series of investigations and studies being conducted on a 100 Area or Hanford-wide basis. These investigations include the river impact study, the shoreline studies, the ecological study, the cultural resources study, and the Hanford Site background study.

The risk assessment methodology will serve as a basis for all risk assessments performed at Hanford and will ensure consistent application of risk assessment methodology to be employed in the 100 Areas. The various levels of risk assessment include:

- o Risk assessment for IRM decisions
- o Baseline risk assessment for operable units
- o Risk assessments for remedial alternatives as part of the focused feasibility study
- o Cumulative risk assessment for final OU remedy selection

These Area Wide Studies will provide data to be included in the LFI Report and in all phases of the IRM risk assessment. The Area Wide Studies will be conducted in parallel with the LFI and the 100 Area Feasibility Study (FS).

4. IRM RISK ASSESSMENT: The IRM risk assessment utilizes information collected during the LFI, and Area Wide Studies for use in IRM decisions prior to the IRM focused feasibility study. The IRM risk assessment should incorporate all available information and be as quantitative as possible. In the absence of sufficient data to perform a quantitative

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risk assessment, a qualitative risk assessment can be used to advance through the IRM process.

5. LFI REPORT: The LFI Report is a secondary document summarizing the data collection activities conducted during the limited field investigation, Area Wide Studies, and risk assessment. The LFI Report will be summarized in the Interim ROD document.
6. FOCUSED FEASIBILITY STUDY (FFS): The N-Springs FFS consists of a detailed analysis of the alternatives developed in the 100 Area FS for selection of the alternative to be implemented at the N-Springs. Modeling will be performed as part of the detailed analysis, if required. An alternative risk analysis will be performed at the same level as the IRM risk assessment presented in number 4 above. Information from the treatability studies and any technology demonstration projects (see number 8) will be used in the analysis of alternatives. If additional field data is required, it will be obtained as part of the FFS. The FFS is documented in the FFS Report, a primary document.
7. 100 AREA FS I and II...: The 100 Area Feasibility Study, Phases I and II, consists of four subtasks: contaminants of concern identification, potential ARARs identification, alternatives development, and alternatives screening. It is expected that information contained in the Final Engineering Evaluation of Containment Alternatives for N-Springs Releases, WHC-SD-EN-EE-003, Rev.0, and other existing N-Area specific documents will significantly contribute to the FFS.
8. TREATABILITY STUDIES: The need for treatability studies and technology demonstrations to support detailed analysis of remedial alternatives will be identified in the 100 Area FS. Information collected in these studies and demonstrations will be used in the FFS for the N-Springs IRM and the FFS for final remedy selection for the operable unit. These studies and demonstrations may run concurrently with the LFI and IRM risk assessment.
9. FFS REPORT: The Focused Feasibility Study Report is a primary document summarizing the data from the 100 Area FS, the treatability studies and demonstration projects, and the detailed analysis conducted during the N-Springs FFS. The FFS Report will support the Interim ROD along with the LFI Report and IRM Plan.
10. IRM PLAN: The IRM Plan is a primary document describing the plan to implement the IRMs for the operable unit. The IRM Plan, which is essentially the same as a conventional CERCLA Proposed Plan, serves as the primary means of public notification for solicitation of comment on the proposed action. This document will be prepared following the issuance of the LFI Report and the N-Springs FFS Report. The IRM Plan is subject to a 30 day public comment period.
11. INTERIM ROD: The Interim ROD is a primary document which summarizes all information contained in the LFI Report, the N-Springs FFS Report, and

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the IRM Plan. The ROD is defined as a CERCLA document used to select the remedial action to be implemented after the FS/proposed plan process has been completed. A Final operable unit ROD will be issued after all sites have been characterized as required and the cumulative risk assessment and other focused FS for final remedy selection have been completed for the operable unit as a whole.

12. IMPLEMENTATION: The IRM proposed in the IRM Plan and Interim ROD will be implemented at this point. The implementation will consist of three basic phases: the design phase, the construction phase, and the operation and monitoring phase. Any data collected as a result of the IRM implementation will be used in the cumulative risk assessment and the final remedy selection for the operable unit.

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100 Area Field Activities
January 23, 1992

Distribution:

Pamela Innis, EPA (B5-01)
Donna Lacombe, PRC
Ward Staubitz, USGS
Diane Clark, DOE (A5-55)
Doug Fassett, SWEC (A4-35)
Mary Harmon, DOE-HQ (EM-442)
Mike Thompson, DOE-RL (A5-19)
Tom Wintczak, WHC (B2-15)
Mel Adams, WHC (H4-55)
Merl Lauterbach, WHC (H4-55)
Linda Powers, WHC (B2-35)
Don Praast, GAO (A1-80)
L.D. Arnold, WHC (B2-35)

~~Ronald D. Izatt (A6-95)~~
~~Director, DOE-RL, ERD~~
Ronald E. Gerton (A6-80)
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100-KR-1, 100-KR-4, 100-NR-1, 100-NR-3; Care of Susan Wray, WHC (H4-22)

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