



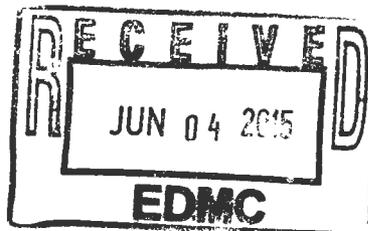
Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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15-AMRP-0190

MAY 26 2015

Mr. K. Niles, Administrator
Nuclear Safety Division
Oregon Department of Energy
625 Marion Street Northeast, Suite 1
Salem, Oregon 97301



Dear Mr. Niles:

REMEDIAL INVESTIGATION/FEASIBILITY STUDY AND RCRA FACILITY
INVESTIGATION/CORRECTIVE MEASURES STUDY WORK PLAN FOR THE 200-DV-1
OPERABLE UNIT, DOE/RL-2011-102, DRAFT A

This letter responds to your May 8, 2015, comments on the Remedial Investigation/Feasibility Study and RCRA Facility Investigation/Corrective Measures Study Work Plan for the 200-DV-1 Operable Unit, DOE/RL-2011-102, Draft A.

The U.S. Department of Energy Richland Operations Office (RL) would like to thank the State of Oregon Department of Energy (ODOE) for their comments and suggestions on the subject Work Plan. RL's responses to ODOE's comments are attached. The characterization work for 200-DV-1 Operable Unit is expected to begin this summer.

If you have any questions, please contact me, or your staff may contact Mike Cline, of my staff, on (509) 376-6070.

Sincerely,

Ray J. Corey, Assistant Manager
for the River and Plateau

AMRP:JGM

Attachment

cc: See page 2

1229213
200-DV-1

Mr. K. Niles
15-AMRP-0190

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MAY 26 2015

cc w/attach:

J. V. Borghese, CHPRC

M. E. Byrnes, CHPRC

C. E. Cameron, EPA

D. A. Faulk, EPA

J. A. Hedges, Ecology

R. A. Lobos, EPA

N. M. Menard, Ecology

C. P. Noonan, MSA

R. E. Piippo, MSA

V. J. Rohay, CHPRC

S. A. Simmons, CHPRC

M. J. Turner, MSA

Administrative Record

Environmental Portal

U.S. Department of Energy Richland Operations Office (RL) Response to State of Oregon Department of Energy (ODOE) Comments on the “Remedial Investigation/Feasibility Study and RCRA Facility Investigation/Corrective Measures Study Work Plan for the 200-DV-1 Operable Unit, DOE/RL-2011-102, Draft A.”

ODOE Comment:

The Work Plan states that 43 waste sites are “currently” assigned to the 200-DV-1 Operable Unit. The Work Plan says that the 200-DV-1 Operable Units consist of waste sites that are “primarily cribs and trenches adjacent to and associated with the B-BX-BY, T-TX-TY and S-SX tank farm WMAs.” We are unclear if there is an intent to add other waste sites to 200-DV-1 in the future. As potential candidates for inclusion, we suggest other cribs and trenches associated with WMA-A, WMA-C, WMA-U, PFP, REDOX and the BC-cribs.

RL Response:

When the 200-DV-1 Operable Unit (OU) was established by the Tri-Parties it was discussed that as site characterization work progresses some waste sites might be moved from one OU to another to facilitate remediation activities. However, at this time consensus has not been reached to move waste sites between OUs based on current knowledge of contamination. From the start it was recognized that 200 DV-1 did not include all of the deep vadose contamination waste sites. However, all of the cribs and trenches (including potential deep contamination sites) are assigned to operable units such as WA-1, EA-1 and DV-1. The assumption is that waste sites will not be moved between OUs because doing so may greatly complicate the RI/FS work plans from this stage forward. As site characterization work progresses some waste sites may be moved from one OU to another if agreed to by the Tri-Parties. Regardless of the OU, waste sites with deep vadose zone contamination will be appropriately evaluated.

ODOE Comment:

Oregon suggests that the Tri-Parties consider the Hanford Advisory Board advice on Central Plateau Inner Area Cleanup Principles, and revise this Work Plan to reflect relevant positions by the Board (HAB Advice #283). In particular, as it most directly relates to this draft Work Plan, DOE should not reduce the Depth Point of Compliance to 10 feet.

RL Response:

The 200 DV-1 work plan includes both shallow and deep characterization. The depth point of compliance will be consistent with other OU waste site evaluations. The regulators have not agreed with an alternative point of compliance for depth, and the Inner Area “guidelines” clearly identify that. If RL decides to pursue an alternative point of compliance, RL will need to provide a comprehensive evaluation as part of the RI/FS and Proposed Plan.

ODOE Comment:

The purpose of the Remedial Investigation and the Feasibility Study is to determine the nature and extent of contamination and to select remedies and remedial treatment technologies.” Oregon notes that the vadose zone technologies that are being considered all fall within the in-situ contaminant immobilization camp (like desiccation or ammonia gas injection). These technologies have not been proven to be successful or permanent. Therefore, we encourage DOE

Attachment

and its regulators to continue to also search for appropriate technologies that could be used to remove vadose zone contamination (e.g., in-situ soil flushing) in lieu of immobilization.

RL Response:

The evaluation of remedial treatment technologies for the 200-DV-1 work plan is not limited to in-situ technologies. However, if, based on characterization data, it is decided that a treatability test should be conducted it will most likely be an in-situ technology to evaluate implementability and permanence as part of the RI/FS process. In addition, part of the FS process is to identify potential treatment technologies that are available and that should be considered.

ODOE Comment:

Finally, after the surprising success of the Perched Zone Pumping Treatability Study at the BY Cribs, Oregon urges the Tri-Parties to proceed with all appropriate haste to identify and pump-treat all similar contaminated locations in the Central Plateau. Intercepting vadose zone contamination before it reaches groundwater is a much more effective and permanent method of cleanup.

RL Response:

As waste site investigations proceed, we will definitely be looking for possible perched zones. RL agrees that intercepting vadose zone contamination before it reaches groundwater is preferred.