



**Change Notice for Modifying Approved Documents/ Workplans
In Accordance with the Tri-Party Agreement Action Plan,
Section 9.0, Documentation and Records**

Change Number	Document Submitted Under Tri-Party Agreement Milestone	Date:
TPA-CN-147	M-013-00L	12/27/05
Document Number and Title: DOE/RL-2001-65, 200-MW-1 Miscellaneous Waste Group Operable Unit RI/FS Work Plan		Date Document Last Issued: 06/03/2002
Originator: M. E. Todd-Robertson		Phone: 373-3920
<p>Description of Change: The work plan is being changed to move Remedial Investigation (RI) Report elements for the 216-A-4 Crib, an identified representative site for the Operable Unit (elements include data quality assessment, data evaluation, risk assessment, and fate and transport modeling), from the RI report to the Feasibility Study (FS).</p> <p>The U.S. Department of Energy, Richland Operations Office (RL) (F. M. Roddy/L. D. Romine) and the U.S. Environmental Protection Agency (EPA) (C. E. Cameron) agree that the proposed change modifies an approved work plan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, <i>Documentation and Records</i>, and not Chapter 12.0, <i>Changes to the Agreement</i>.</p> <p>5.2.5 Remedial Investigation Report: In this section of the work plan, page 5-6, modify the first sentence from "These activities will be performed as part of the RI report preparation" to "These activities will be performed as part of the RI report preparation for the 216-U-3 French Drain, 216-T-33 Crib, 216-T-13 Trench, and 200-E-4 French Drain. These activities will be performed as part of the feasibility study preparation task for the 216-A-4 Crib." The affected page is attached.</p>		
<p>RECEIVED JAN 17 2006</p> <p>EDMC</p>		
Justification and Impacts of Change:		
<p>RL initiated drilling of a borehole at the 216-A-4 Crib as part of the remedial investigation activities identified in the 200-MW-1 Miscellaneous Waste Group Operable Unit RI/FS Work Plan (DOE/RL-2001-65), which was approved by the EPA in July 2002. Drilling commenced in July 2004, when contamination levels exceeded anticipated levels in the borehole at approximately 23 ft bgs. Drilling was stopped and replanning activities were initiated. Drilling activities resumed in March 2005 and again in May 2005; activities were subsequently halted in each effort due again to higher than anticipated contamination levels. Replanning at the 216-A-4 Crib is required prior to completing the remedial investigation at the crib and for the 200-MW-1 Operable Unit. The time involved in gaining a better understanding of the crib, in identifying an appropriate path forward for the characterization, and in obtaining the characterization data does not support completion of the TPA Milestone for the 200-MW-1 RI Report if 216-A-4 data are included. By deferring the 216-A-4 Crib evaluation to the FS, efforts on the FS can proceed, while the RI Report milestone (M-015-44A) can remain intact. Moving the data evaluation, risk assessment, and fate and transport modeling from the RI report to the FS will have no adverse impact on the outcome of the RI/FS process.</p>		
Approvals:		
 Matt McCormick RL Unit Manager*	12/27/05 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
 Craig Cameron Lead Regulatory Unit Manager*	1/3/06 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved

contaminant fate and transport; refining the site conceptual models; and evaluating risks through a qualitative risk assessment (QRA). These activities will be performed as part of the RI report preparation task for the 216-U-3 French Drain, 216-T-33 Crib, 216-T-13 Trench, and 200-E-4 French Drain. These activities will be performed as part of the feasibility study preparation task for the 216-A-4 Crib.

5.3.5.1 Data Quality Assessment. A DQA will be performed on the analytical data to determine if they are the right type, quality, and quantity to support their intended use. The DQA completes the data life cycle of planning, implementation, and assessment that began with the DQO process. In this task, the data will be examined to see if they meet the analytical quality criteria outlined in the DQO and are adequate to evaluate the decision rules in the DQO.

5.3.5.2 Data Evaluation and Conceptual Model Refinement. This task will include evaluating the information collected during the investigation. The nonradiological and radiological data obtained from the boreholes will be compiled, tabulated, and statistically evaluated to gain as much information as possible to satisfy data needs. Data evaluation tasks may include the following:

- Graphically evaluating the data for vertical distribution of contamination within each borehole
- Stratifying the data and computing basic statistical parameters such as mean and standard deviation for individual levels (when sufficient data are available). This evaluation can provide an indication of contaminant distribution
- Constructing contour diagrams and variograms to evaluate spatial correlations within each stratum. This evaluation will indicate whether or not contamination is concentrated in a particular area (e.g., near the influent end for trenches)
- Performing statistical tests on the data to evaluate the presence or absence of contamination. There are many facets to this step, including determining the distribution of the data and selecting the appropriate statistical tests. The initial screening for contamination should evaluate the data with respect to background, by using simple comparisons of an upper bound of the data to background concentrations (e.g., *Model Toxics Control Act* tests), or through more complex comparisons, such as nonparametric hypothesis tests (e.g., Wilcoxon Rank Sum Test). These tests may also compare the data to appropriate cleanup levels.

All of these statistical evaluations will aid in refining the conceptual model for this OU and selecting the remedial alternative. However, because the sites within the 200-MW-1 OU represent point-source types of releases, statistical analysis may not always be possible. Single boreholes are planned at the representative sites, and if the resulting data are not sufficient for statistical analysis, maximum or average concentrations will be used in the data evaluation process.

Data on the soil physical properties will be used to determine the soil type, which will assist in choosing the proper unsaturated hydraulic conductivity/moisture retention curve. Identification