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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 4, 2000

Mr. Glenn I. Goldberg
Project Manager, Environmental Restoration Division
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: HO-12
Richland, Washington 99352

Dear Mr. Goldberg:

Re: Review Comments on the *Remedial Design Report/Remedial Action Work Plan for the 100-NR-1 Treatment, Storage and Disposal Units*, DOE/RL-2000-16, Draft A

Enclosed for your review and resolution are the Washington State Department of Ecology's (Ecology) comments on the above referenced document. The document requires modification prior to final approval by Ecology. For convenience, the comments are presented in two areas: general and specific.

Please contact me at (509) 736-3037 if you have any questions or concerns regarding these comments.

Sincerely,

Rick Bond
N Area Project Lead
Nuclear Waste Program

Enclosure
RB:lkd

cc: Dennis Faulk, EPA
J.R. Wilkinson, CTUIR
Pat Sobotta, NPT
Nanci Peters, YIN
Mary Lou Blazek, OOE
Administrative Record, 100-NR-1 Operable Unit

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**Official Washington State Department of Ecology Comments
on DOE/RL-2000-16, Draft A
Remedial Design Report/Remedial Action Work Plan for the 100-NR-1
Treatment, Storage, and Disposal Units
May 2000**

General Comments

1. The report contains all the necessary elements of a remedial design report/remedial action work plan (RDR/RAWP). The next draft of the work plan can most likely be approved if the comments listed below are addressed to the satisfaction of Ecology.
2. It is recommended that the document state that a contained-in determination for methanol is being pursued so that the state-only F003 code can be removed from the waste and the waste can be sent to ERDF.
3. The WIDS site identification numbers (i.e., 116-N-1, 116-N-3, etc.) have been used throughout most of the report (as they should be), but the old ID numbers (i.e., 1301N, 1325N, etc.) appear in a few places. State the old numbers in parenthesis the first time the sites are called out (page 1-1) and then only use the WIDS ID numbers in the remainder of the report.
4. There does not appear to be a need to include Tables 2-1 through 2-6 in a remedial design report. These tables provide background information, and only confuse and obscure the important data. It is recommended that these tables be removed from the report.
5. In light of the fact that this RDR has both RCRA and CERCLA components, and considering the recent concerns regarding Waste Control Plans and Waste Management Plans, please review Section 4.0, Waste Management, for completeness and accuracy.
6. The document is not completely clear on how the 120-N-1, 120-N-2, and 100-N-58 sites will be remediated. For example, Section 2.1.2 states that "contaminated" liners, structures, etc. will be removed but Sections 3.1.2.2 and 3.1.2.3 states that "uncontaminated materials" will be removed and taken to "an onsite demolition debris disposal facility". It is our understanding that the closure plan says these materials will be sampled and disposed of as necessary based on the results. It is not clear what happens with the waste if it is contaminated. Also, it is not clear as to whether the piping, or how much piping, will be removed depending on whether it is contaminated or not. Please be sure the RDR is consistent with the Closure Plan, and if ambiguities still exist, please include a final determination and explanation in the RDR. Also, if possible, please identify the specific disposal facility for the liner, fencing, etc. Section 4.0 should also cite the specific disposal facility for the liner, fencing, etc. if they are not contaminated. See Specific Comment #7 below.
7. Be sure the cleanup value for arsenic is stated in 20 mg/kg wherever it appears in the document.

Specific Comments

1. Page 1-1, Line 34: Use the old site ID numbers (i.e., 1301N and 1325N) in parentheses following the WIDS ID numbers and then use the WIDS ID numbers throughout the remainder of the report.
2. Page 1-2, Lines 5-7, and Line 41: It appears that this is referring to the 83 sites that will be remediated under the 100-NR-1/100-NR-2 ROD. Please reference the ROD and use the exact number, i.e. 83 sites.
3. Page 1-2, Lines 29-33: It is not clear what is meant by adjacent or additional sites. Please clarify.
4. Page 1-3, Lines 11&12: Sentence may read better to say, "...currently **enclosed** by a chain-link fence and access is controlled by ~~a~~ lock and key."
5. Page 1-3, Paragraph 1.3.1.2: Remove the reference to the old waste site designators (i.e., 1325-N, etc.).
6. Page 2-1, Line 30: Delete the first "general" in the sentence.
7. Page 2-2, Section 2.1.2: Section 2.1.2 needs a general introduction and the entire paragraph currently listed under Section 2.1.2 would make more sense to be located in Section 2.1.2.2. Also, the first sentence in Section 2.1.2 states that "contaminated" liners, structures, etc. will be removed. Sections 3.1.2.2 and 3.1.2.3 (and the Closure Plan) states that the liners, leak detection system, sheds, and fence will be removed and disposed of even if they are not contaminated. Please see general comment # 6 above.
8. Tables 2-1 through 2-7: Several of the values presented in Tables 2-1 through 2-7 are not consistent with the values presented in similar tables in the CMS or the ROD for 100-NR-1 and the compound lists are not consistent. It is difficult to compare these values, however, because the table titles are not quite consistent with those in the CMS. Please check, or possibly remove, Tables 2-1 through 2-6 since they only provide backup information not needed in this report (See comment # 4 above). Table 2-7 is different than Table 2 presented in the ROD in that the headers are stated differently, it has different values for tritium and lead, contains several different compounds (I know this was discussed earlier), and does not contain thorium-228 and 232 or uranium 233/234 and 238. Please check this table to be sure it is consistent and the differences are explained.
9. Table 2-8: The first box under the "Remediation Levels" section and the three bullets need to be reworded to make sense (i.e., "starting above 15 ft and extending below 15 ft" doesn't make sense). In the second bullet of this same section, the statement "use RESRAD to determine contamination levels" doesn't make sense. It was our understanding that the levels were set in Table 2-7. It seems that the first and third bullets are redundant with regard to the MTCA Method B levels. Please explain

10. Table 2-8, Box just above "Earthen Structures": Reword to say: Remove soils that contain Pu-239/240 contamination to a depth of 1.5 m (5 ft) below engineered structure.
11. Page 3-12, Line 4: Need to define a "significant change" more clearly. It currently states a 50% increase in the total cost. What about a 25% increase? Is that significant?
12. Page 3-12, Line 6: Reword to state "A delay in the scheduled completion of a remedial action or objective."
13. Page 4-1, Section 4.1: The first paragraph and the second paragraph with the bullets appear to say essentially the same thing. Please review and change as needed.
14. Page 4-2, First Paragraph: The sentences starting on lines 3 and 6, starting with "It is anticipated that..." say essentially the same thing. Please review and change as needed.
15. Page 4-2, Section 4.4, Line 36: Table 4-1 is an important table for remediation but it doesn't seem to fit in the sentence starting with "After sampling..." in the context currently shown. Please reword this to call out Table 4-1 with its title so it doesn't get lost in the discussion.