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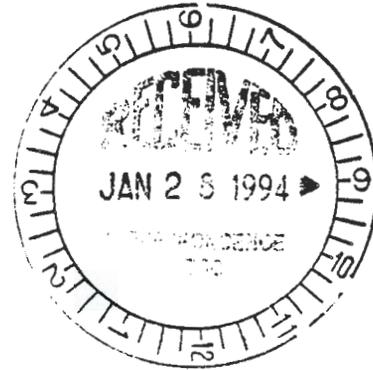
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JAN 21 1994

94-ERB-054

Mr. Dave C. Nylander
Nuclear and Mixed Waste
State of Washington
Department of Ecology
7601 W. Clearwater, Suite 102
Kennewick, Washington 99336

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



Dear Messrs. Nylander and Sherwood:

SUBMITTAL OF THE 100-HR-2 RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION/CORRECTIVE MEASURES STUDY (RFI/CMS) WORK PLAN, DRAFT A, FOR PUBLIC COMMENT

Please find enclosed the subject RFI/CMS work plan (enclosure 1) submitted by the U.S. Department of Energy, Richland Operations Office (RL), to the State of Washington Department of Ecology (Ecology) for public comment per sections 7.4.2, 9.2.1, and 10.6 of the Hanford Federal Facility Agreement and Consent Order.

Also enclosed are RL's responses to Ecology's comments on revision 0 of the 100-HR-2 OU RFI/CMS Work Plan (enclosure 2 [Ecology ltr. to Steven H. Wisness from Gary Freedman "100-HR-2 Operable Unit Resource Conservation and Recovery Act Facility Investigation/Corrective Measures Study (RFI/CMS) Work Plan," dtd. August 26, 1993]). Draft A of this work plan incorporates all RL's responses to Ecology comments on work plan text as discussed and agreed to by Ecology representatives in the final comment resolution meeting held in December 1993. Upon completion of public review and comment on the subject document, and satisfactory resolution of comments, RL will submit revision 1 to Ecology for approval.

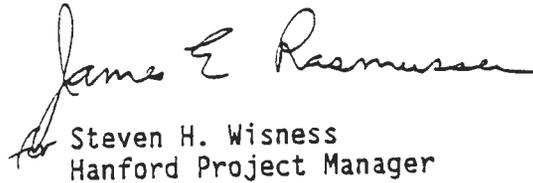
Copies of Draft A of the 100-HR-2 OU RFI/CMS Work Plan will be sent to Public Information Repositories in Richland, Seattle, and Spokane, Washington, and in Portland, Oregon, in anticipation that the 30-day public comment period for this work plan will start on January 24, 1994, and end on February 23, 1994.



JAN 21 1994

Please address any comments or questions regarding this correspondence to
Mr. E. D. Goller at (509) 376-7326.

Sincerely,


Steven H. Wisness
Hanford Project Manager

END:EDG

Enclosures: As stated

cc w/encls:

B. Austin, WHC
S. Balone, EM-442
P. Beaver, EPA
G. Freedman, Ecology (3)
M. Wallace, Ecology
EDMC, H6-08

cc w/o encls:

J. Donnelly, Ecology
M. Hughes, WHC
R. Henckel, WHC
J. Patterson, WHC
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R. Stanley, Ecology
T. Wintczak, WHC

RESPONSES TO
WASHINGTON STATE DEPARTMENT OF ECOLOGY
COMMENTS ON THE
100-HR-2 OPERABLE UNIT WORK PLAN

9413150-1843

1.	The first draft of the 100-HR-2 Operable Unit (OU) work plan was delivered as Rev. 0. This classification is normally reserved for the final, approved document. It is expected that subsequent drafts, less the final, approved document, will be listed on the order of Drafts B, C, etc., and this first draft should be considered as Draft A.	Accepted. The revised draft will be Draft A
2.	As discussed in the 100-HR-2 OU work plan transmittal letter, dated June 28, 1993, DOE should be prepared to present and discuss proposed treatability studies for inclusion in this work plan. Topics should include a discussion of the types of studies available, scoping, schedules, and the setting of Milestones.	Accepted. Specific treatability studies are presented and discussed in the Treatability Study Program Plan. Treatability studies will be discussed at the resolution meeting.
3.	As set forth in the scoping of the 100-HR-2 OU work plan (100-HR-2 scoping notes dated Feb. 11 and Apr. 1, 1993), it was determined that the IRM path would be followed for the remediation of burial grounds. However, the work plan makes it unclear as to which path, LFI or IRM, is to be pursued. It needs to be clarified that the IRM path is indeed the path that will be followed for the burial grounds.	Accepted. Will clarify that the 100-HR-2 Burial Grounds are on the IRM pathway.
4.	There are several treatability studies either in progress, or planned for the future. The scope of this work plan should discuss the inclusion of data from any recent or future Tri-Party agreements made on treatability studies, and the possible impact they may have on the 100-HR-2 OU.	Rejected. Other documents report the specific plans and results of treatability studies particularly the focused feasibility study report.
5.	A brief description of some of the applicable reactor components is given in the work plan. In order to more fully understand the relationships between these different reactor components, a simplified cross-section or schematic diagram of basic reactor construction including all referenced components should be incorporated.	Rejected. Descriptions of reactor components which are components of the waste are provided in the work plan. For a more complete discussion of reactor systems please see General Electric, 1963 in the reference section.
6.	There are many eco- and geological technical terms used in this work plan that require clarification. It is suggested that adding a glossary of technical terms would greatly aid the reader in reviewing these types of documents.	Rejected. This work plan follows the existing format which does not include a glossary of common technical terms.

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7.	Throughout this and other work plans, different waste site numbering systems are used. Numbering of waste units should be consistent throughout this work plan, and with other work plans, for compatibility when cross-referencing.	Accepted. Current practice is to use the WIDS nomenclature. Some correlation to previous terminology is provided for convenience. Will update all applications.
8.	Sect 4 does not make it clear that existing data is already sufficient for a Qualitative Risk Assessment (QRA), and to perform IRM's, as discussed in scoping meetings. This chapter will need to clarify this fact.	Accepted. Section 4.2.1.2, para. 2.
9.	Sect 4 rationale does not clearly differentiate between those data needs and uses required for conducting the IRM's, and those for the final remedy selection. These items need to be dealt with separately in order to bely any confusion in the definition of their respective needs and uses for data.	Rejected. Table 4-1 identifies the data needs that support the initial phase of the Hanford Past-Practice Strategy. Final remedy data needs will be addressed later.
10.	<p>Comment: Sect II, pg ES-1/2, para 2</p> <p>States that the available data, "was determined to be sufficient to formulate conceptual models and perform a Qualitative Risk Assessment (QRA) following the IRM pathway," yet the LFI path on figure ES-2 seems to be followed concurrently with the IRM path.</p> <p>Recommendation: The reason for these concurrent pathways needs to be clearly stated.</p>	Accepted. ES-2; p. 1-2; p. 5-7.
11.	<p>Comment: Table ES-1</p> <p>There are major discrepancies in the actual volume and the amount of waste received for the 128-H-1 and 118-H-1 waste units. This may be accounted for in the 128-H-1 Burning Pit if the reference is to the pre-burn volume, but this difference cannot be accounted for in the 118-H-1 Burial Ground.</p> <p>Recommendation: These entries should either be corrected, or an explanation for the discrepancy should be noted in this table.</p>	Accepted. Dimensions of burial grounds and waste volumes disposed are not equal. This footnote will be added to Table ES-1 and Table 4-3.

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12.	<p>Comment: Sect 1.1, pg 1-1, para 1</p> <p>The reference for the Hanford Site Past-Practice Strategy (DOE-RL 1991a) in chapter 8 is document number DOE/RL-91-40. This is inconsistent with documents in the possession of Ecology, which are numbered DOE/RL-91-04.</p> <p>Recommendation: If the work plan is incorrect, it should be corrected. If all of Ecology's documents are incorrect, we should be furnished with corrected, up-to-date copies.</p>	Accepted. DOE/RL-91-40 is the correct reference. Ecology should request a correct version, so numbered, from DOE.
13.	<p>Comment: Sect 1.1, pg 1-2, para 4</p> <p>Due to the non-intrusive nature of the LFI, identifying the extent and types of contaminants contained within the burial grounds may be possible through analogous sites and historical data, but is by no means certain.</p> <p>Recommendation: This paragraph should reflect the fact that identification of these factors may not be fully accurate due to no direct intrusive work at the burial grounds.</p>	Accepted. p. 1-2, para. 3, following sent. 1. ("The selection of the IRM pathway maximizes the use of existing process knowledge, waste characterization data, and burial ground information and the application of the observational approach during the IRM.")
14.	<p>Comment: Sect 1.3, pg 1-3, para 1</p> <p>This paragraph implies that there will be no field work associated with the 100-HR-2 OU Work Plan, when, in fact, data from intrusive work at analogous facilities will be included.</p> <p>Recommendation: This paragraph should make it clear that there will be no field or laboratory analyses performed <u>at</u> the 100-HR-2 OU as part of the LFI.</p>	Accepted. (<u>at</u> inserted)
15.	<p>Comment: Sect 2.1.4, pg 2-4, para 3</p> <p>As stated in this paragraph, there has been no attempt made to calculate the decayed radionuclide inventories through to the present.</p> <p>Recommendation: This is not a difficult calculation, and included in this work plan, there should be a table with estimated radionuclide inventories decayed to the present.</p>	Accepted in part. Will not decay radionuclides at this time, but will modify the text to state that: "In general, radionuclides have been decayed to 1986 (Stenner et al.) as a base line to maintain consistency with other work plans and to apply the analogous site approach".

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16.	<p>Comment: Sect 2.1.4.1, pg 2-4, para 2</p> <p>The text states, "... types of solid wastes generated by various facilities at Hanford are different ..." Although there are some specialized waste sites at Hanford, this is not entirely true, as there are several analogous sites throughout the 100 areas, as shown in table 2-2.</p> <p>Recommendation: This paragraph needs to be clarified, or revised to express what is trying to be said about these waste sites.</p>	Accepted. (Oriented statement to 100 Area disposal practices being similar.)
17.	<p>Comment: Sect 2.1.4.1, pg 2-4, para 3</p> <p>It seems that there were considerable amounts of Co, Cs, Eu, Sr, Tritium, and other constituents disposed of in these burial grounds that have relatively long half lives. The basis for considering these half lives as long, is unclear.</p> <p>Recommendation: It needs to be clarified in this paragraph what is considered a short or long half life, which nuclides are considered short-lived, along with the basis for these classifications.</p>	Accepted. No change was made in the text because of subjective use of "short half-life" in the Backman reference. It is likely that the reference to short half-life was to radionuclides which say in 30 years would have essentially decayed away (those with which ten half-lives would have reduced concentration to about 0.1% of the original level or those with half-lives of <3 years).
18.	<p>Comment: Sect 2.1.4.1, pg 2-5, line 2</p> <p>This line references section 2.1.3 for definitions of reactor components mentioned in this section. There are none of these definitions in the referenced section.</p> <p>Recommendation: These definitions should be added, or referenced somewhere else in the work plan.</p>	Accepted. Table 2-3 should have been referenced - corrected.

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19.	<p>Comment: Sect 2.1.4.1, pg 2-6, para 5 and bullet 2</p> <p>The statement, "The sampling was not directed at establishing the radionuclide inventory," is confusing and inconsistent with the bullet which states that one of the parameters for the sampling was intended to "identify the concentration of radionuclides present." If the concentration of radionuclides present was identified, shouldn't there have been some kind of inventory established for the burial ground?</p> <p>Recommendation: Provide an explanation for this inconsistency.</p>	Accepted. The Dorian and Richards study set out to characterize radionuclides in the wastes located in the 100 Areas based on estimates of quantities and process knowledge - modified text accordingly.
20.	<p>Comment: Sect 2.1.4.1, pg 2-7, para 1, bullet 3</p> <p>The text identifies the primary radionuclide as "⁶⁰Co through ¹⁵²Eu." The term "through" makes this statement confusing.</p> <p>Recommendation: It should be revised to make it clear as to which is the primary radionuclide, ⁶⁰Co, ¹⁵²Eu, or both.</p>	Accepted. Editorial changes made.
21.	<p>Comment: Sect 2.1.4.3.2, pg 2-11</p> <p>The text refers to the 1607-H1 Sanitary Septic System as still being active.</p> <p>Recommendation: This section should clarify the following questions/concerns: Why is this system still active, and can its purpose be served by portable units rather than continuing to add waste to it?</p>	Rejected. Addressing active septic system is not in the scope of this work plan, therefore no change was made to the text. The question of why the system is still active can be addressed in another forum.
22.	<p>Comment: Table 2-1</p> <p>It has been brought to the attention of Ecology that the locations of some of these waste sites are not yet known.</p> <p>Recommendation: If the location of a waste site is not known, it should be reflected in the facility description section of this table.</p>	Accepted. Clarification incorporated. The location of the Buried Thimble Site is known, however the exact configuration is uncertain. Geophysics will be used to help determine the configuration of the unit.

23.	<p>Comment: Sect 3.1, pg 3-1, para 1</p> <p>It is Ecology's belief that this background study may not be completed in a time frame that will be useful to this work plan.</p> <p>Recommendation: Alternatives must be presented here to cover the situation in the case that this background study will not be available as a reference.</p>	<p>Accepted. The alternative is to continue to use background data from Hoover and LeGore and the HSB RAM recommended 95th percentile for background concentrations in the QRA activities.</p>
24.	<p>Comment: Sect 3.1.2.1, pg 3-3, para 2</p> <p>This section references a preliminary soil background study. See comment number 23.</p> <p>Recommendation: It should be clarified as to whether this preliminary document be useful for the execution of this work plan.</p>	<p>Accepted. DOE/RL-92-24 Rev. 1, 1993 documents the most recent soil background data for chemical contaminants. Summary information will be incorporated and reference will be made to this new data source.</p>
25.	<p>Comment: Sect 3.1.2.1, pg 3-3, para 2, Figure 3-3, and Table 3-3</p> <p>This figure and table are directly referenced from the most recent revision of <u>Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes</u>, which has no mention of <u>Hoover and LeGore 1991</u>.</p> <p>Recommendation: Please explain this discrepancy. Are these two documents one and the same, or is this just an incorrect reference?</p>	<p>Accepted. The updated reference is (DOE/RL-92-24 Rev.1, 1993).</p>
26.	<p>Comment: Sect 3.1.2.2, pg 3-3, para 2</p> <p>This section refers to sampling results done near waste sites in the 100-HR-1 OU for analogy to similar waste sites in the 100-HR-2 OU.</p> <p>Recommendation: It should be clarified as to what similar facilities there are to the 116-H-1 disposal trench and the 116-H-7 retention basin in the 100-HR-2 OU that justify the use of these results for this analogy.</p>	<p>Accepted. The text will clarify that due to the 116-H-2 Trench overflow which may have affected the Buried Thimble Site in the 100-HR-2 Operable Unit, soil sampling completed in connection with that incident may be useful in characterizing the soils at the Buried Thimble Site.</p>

27.	<p>Comment: Sect 3.3.1.2, pg 3-6, para 2, and 3.3.1.3, pg 3-7, para 1</p> <p>The text makes reference to the infiltration potential being negligible for contaminant migration from burial grounds. This may be true in some years, but there is a substantial amount of precipitation occurring in other years. For example, during the winter of 1991-92, a record six feet of snow fell in the Tri-City area. Since the cribs surface consists mainly of cobble, infiltration rates are usually higher than native soils.</p> <p>Recommendation: This release mechanism needs to be re-evaluated, and presented in a more feasible manner.</p>	<p>Accepted. Short-term, simulated and natural drainage lysimeter studies conducted to aid in modeling efforts indicated some small drainage (1.0 to 1.5 cm/year) to depths of 7.6M (Jones, et al. 1984). Data from longer-term studies in closed-bottom lysimeters and in a depth-distribution study at a waste site suggest that waste movement over a ten-year period appeared to be upward. (Routson and Johnson, 1990). For clarification the text will be modified.</p>
28.	<p>Comment: Sect 3.3.1.3, pg 3-7, para 2</p> <p>The text states that there is no evidence indicating small mammals and ants bring contaminants to the surface where wind transport can occur. There is no mention of where this observation took place.</p> <p>Recommendation: If this information was taken from an existing document, it should be referenced here.</p>	<p>Accepted. Reference has been included - (Weiss 1993) although not released yet, it will probably be released before completion of this work plan.</p>
29.	<p>Comment: Table 3-5</p> <p>This table shows values for ⁹⁰Sr at the 100 areas of Hanford as ten times that of the distant community samples. This is a significant difference.</p> <p>Recommendation: Please give an evaluation of this difference as a possible cause for concern.</p>	<p>Rejected. The difference is not a cause for concern because the values are at non-detectable levels. When the error margins are greater than the readings this indicates the inability of the instrument to detect to that level.</p>
30.	<p>Comment: Table 3-5</p> <p>The table reads an error for distant community sampling of ⁹⁰Sr as ± 9.000008 pCi/m³. This is inconsistent with all other error values in this table.</p> <p>Recommendation: If this is a typographical error, it should be corrected. If it is not, the cause for this discrepancy with all of the other error values on this chart should be explained in the notes for this table.</p>	<p>Accepted. Typographical error will be corrected. (9.000008 pCi/m² should be 0.000008 pCi/m²)</p>

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31.	<p>Comment: Table 3-5</p> <p>Note 3 suggests that negative values are common in radiological testing because of the need to subtract instrument background. It is not logical to assume that an instrument's sample reading is less than its background reading.</p> <p>Recommendation: If an instrument reading is below background, then the background value for the instrument should be re-evaluated.</p>	<p>Rejected. The practice of accounting for instrument background is based on a normal distribution of measurements. Unless a level of non-detection is established, very low values as indicated will occasionally result in negative readings (non-detectable).</p>
32.	<p>Comment: Sect 4.1.2.3, pg 4-5/6</p> <p>It is implied here that the IRM pathway still needs to be evaluated using this data. As stated in the general comments, the determination to follow the IRM pathway has already been made.</p> <p>Recommendation: The fact that the IRM pathway <u>will</u> be followed needs to be clarified in this section.</p>	<p>Accepted. The LFI will be used to confirm IRM pathway.</p>
33.	<p>Commend: Sect 4.2.1.2.2</p> <p>There are two contaminated tank trucks and a tractor parked inside the exclusion area fence near the 105-H Rod Cave. Apparently, they fall under the cognizance of Decontamination and Decommissioning.</p> <p>Recommendation: The disposition of these vehicles should be included here in the investigation of other decommissioned facilities.</p>	<p>Rejected. This work plan does not address items temporarily stored in the operable unit.</p>
34.	<p>Sect 1.1, pg 1-2, para 2</p> <p>States that, "The waste sites in the 100-HR-2 OU consisted primarily of liquid waste disposal sites." This is incorrect. This line should be changed to read " . . . solid waste disposal sites."</p>	<p>Accepted. Sentence removed.</p>
35.	<p>Sect 1.1, pg 1-2, para 3</p> <p>Reads, " . . . to refine the conceptual, conduct the QRA, . . . " This is confusing and should be changed to read, " . . . to refine the conceptual <u>model</u>, conduct the QRA, . . . "</p>	<p>Accepted. "model" inserted.</p>

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<p>36.</p>	<p>Sect 1.1, pg 1-2, para 3</p> <p>Reads, " . . . no intrusive field activities are required during the conduct of the LFI . . . " To clarify the fact that data from treatability studies and analogous facilities will be used, the wording should be changed to reflect that there will be no intrusive work performed <u>at</u> the 100-HR-2 OU during the conduct of its LFI.</p>	<p>Accepted. "at" inserted.</p>
<p>37.</p>	<p>Sect 1.1, pg 1-2, para 4</p> <p>This paragraph describes what data will be included in the LFI. It should also be reflected here that data from any applicable current or future treatability tests will be included in the LFI.</p>	<p>Rejected. Details of applicable treatability studies will be developed in connection with the focused feasibility study and will be included in FFS report.</p>
<p>38.</p>	<p>Sect 1.1, pg 1-3, fifth bullet</p> <p>There is no reference for this document in section 8.0. This reference should be added.</p>	<p>Accepted. Reference added.</p>
<p>39.</p>	<p>Sect 1.2, pg 1-3</p> <p>The second paragraph says essentially the same thing as the last sentence of the first paragraph. The two paragraphs can be combined with essentially no loss of meaning to avoid causing any confusion.</p>	<p>Accepted. Paragraphs combined.</p>
<p>40.</p>	<p>Sect 1.3, pg 1-3, para 1</p> <p>References section 6.6 of EII 1.9 as "Work Plan Review." This title is incorrect. It should be changed to the proper title, "Changes to Approved Documents."</p>	<p>Accepted. Title changed.</p>
<p>41.</p>	<p>Sect 2.1.1, pg 2-2, para 1</p> <p>The coordinates listed do not match those used on figures 2-1 and 2-5. For consistency, the same coordinate system should be used throughout the work plan.</p>	<p>Accepted. Used coordinates from figures 2-1 and 2-5.</p>
<p>42.</p>	<p>Sect 2.1.4</p> <p>The majority of the radionuclide half lives listed in this section are inaccurate, or erroneously rounded. They should be changed to reflect the proper half lives of their respective radionuclides.</p>	<p>Accepted. Used half-life values as reported in cited documents.</p>

43.	<p>Sect 2.1.4, pg 2-4, para 4</p> <p>This conversion of units to metric does not serve any purpose. Units should be consistent throughout the work plan (example: feet (meters)).</p>	Accepted. Standard practice is metric (english).
44.	<p>Sect 2.1.4.1, pg 2-6, para 2</p> <p>¹³⁷Ea is listed as a fission product. This is not an element. It should either be replaced with the correct element, if one exists for this item, or be deleted.</p>	Accepted. Incorporated in text revision.
45.	<p>Sects 2.1.4.1.1 through 2.1.4.1.5, pgs 2-7 through 2-9</p> <p>These sections give depths for their respective burial grounds. The text should state whether or not this depth includes the clean fill on top of the burial ground.</p>	Accepted. Depth of original excavation plus cover (backfill).
46.	<p>Sects 2.1.4.1.2 through 2.1.4.1.5, pgs 2-8 through 2-10</p> <p>All of these burial grounds seem to have the same estimated curie content. The basis of the 1.00 Curie of ⁶⁰Co for each of these burial grounds should be stated.</p>	Accepted. (See page 2-7 starting "The following estimates of waste are based...")
47.	<p>Sect 2.1.4.1.2, pg 2-9</p> <p>The text states that the waste volume of this burial ground is 2 m³. It should be clarified as to whether this refers only to the west vault, or to the whole burial ground.</p>	Accepted. No proposed text change at this time, however a Technical Baseline Study for the H Area is underway, and should resolve this question prior to preparation of the focused feasibility study.
48.	<p>Table 2-3</p> <p>There are several grammatical errors in this table. The <u>Function or Use</u> block for "dummies" and "Lead Wool" need to be proofread.</p>	Accepted. Spelling corrected.
49.	<p>Sect 3.1, pg 3-1, para 4</p> <p>The text states, "Much of the available related to the . . ." This is confusing, and should read, "Much of the available <u>data</u> related to the . . ."</p>	Accepted. "data" inserted.

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50.	<p>Sect 3.1.1, pg 3-2, para 2</p> <p>The text states, "The inventories are based on documented disposal information rather than measurements at the waste units." This should be clarified as to whether the inventories are based on documented disposal information from the 100-HR-2 OU, or from the listed primary references.</p>	<p>Accepted. Inventory information from primary references. Stenner et al Dorian and Richards Miller and Wahlen</p>
51.	<p>Sect 3.1.3, pg 3-3, para 1</p> <p>The last sentence beginning with, "Although there does not appear to be . . . ," does not make sense. Rewording of the sentence for clarification is necessary.</p>	<p>Accepted. Comma removed after "groundwater"</p>
52.	<p>Sect 3.3.1.3, pg 3-6, line 1</p> <p>This line reads, ". . . conceptual model the follow were identified," and is grammatically incorrect. It should read, ". . . the <u>following</u> were identified as transport media."</p>	<p>Accepted. Sentence modified.</p>
53.	<p>Sect 4.1, pg 4-1, para 1</p> <p>The second sentence is not complete, and does not make sense. It should read something to the effect of, ". . . contamination from these units, is determined to be sufficient to conduct . . ."</p>	<p>Accepted. . . has been determined to be sufficient...IRMs at the burial grounds.</p>
54.	<p>Sect 4.1, pg 4-2, para 2</p> <p>Text states, ". . . will use the observational approach during the implementation of the <u>remedy</u> . . ." For clarification this should read <u>IRM</u> vice <u>remedy</u>.</p>	<p>Accepted. IRM</p>
55.	<p>Sect 4.1.2.2, pg 4-5</p> <p>This section states, "A qualitative risk assessment (QRA) is performed as part of the process to determine the need for an IRM." While this statement is true, it is incomplete. It should be further clarified that the need for an IRM is determined by a QRA, <u>or</u> an ARAR trigger as per the <u>Hanford Site Past Practice Strategy</u> (DOE/RL-9104), pg 15, "IRM Decision."</p>	<p>Accepted. new second sentence "For the 100-HR-2 Burial Grounds the QRA will be used to confirm the decision to conduct the IRM(s)."</p>

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56.	Sect 4.1.2.4, pg 4-6, para 3 Since there will be no intrusive sampling at the 100-HR-2 OU, it should be reflected in this paragraph that the basis for these models should include laboratory testing of selected samples from this <u>and related</u> RFI's.	Accepted. Added "and related" to the text.
57.	Sect 4.2.1.2.1, pg 4-10, para 1 This paragraph describes the data gathering activities required for the IRM. It should also include the review of data obtained from applicable treatability studies.	Rejected. Details of applicable treatability studies will be developed in connection with the focused feasibility study and will be included in FFS report.
58.	Table 4-2 The requirements for Data Quantity sources listed in this table are confusing. This block should be revised to state these requirements more clearly.	Accepted. For other than the primary source, there needs to be backup verification of the data from another source.
59.	Sect 5.1.1.1, pg 5-2, para 2 The text states that there is no notable difference between subtasks for the 100-HR-2 OU work plan and the referenced 100-HR-1 OU work plan, with the exception of subtasks 1e and 1h. It then gives a reason for the difference in subtask 1h between the two work plans, but not for subtask 1e. An explanation of the difference in subtask 1e should be presented here.	Accepted. Paragraph reworded. ...The references to the QAPjP for these two subtasks in the 100-HR-1 Work Plan are not relevant...
60.	Sect 5.1.1.2.2, pg 5-3 This section is confusing. It implies that sampling will be done, but not when, or which action—an IRM or the final remedy—it applies to. A clarification should be made in this paragraph as to whether the mentioned sampling will be done under the IRM or the final remedy.	Accepted. <u>Anytime</u> a field sample is taken, geodetic control will pin-point sample location.
61.	Sect 5.1.1.2.3 activity 2c-2, pg 5-4 These bullets address facilities that will be deferred to the final remedy. They should also include soils from the ash pit and sludge from the active septic tank.	Accepted. Ash pit added. See comment 62 for active septic system.

62.	<p>Sect 5.1.1.2.3 activity 2c-2, pg 5-4</p> <p>The Septic Systems paragraph addresses the inactive septic tank, tile field, and the active tile field. It should also address the active septic tank.</p>	<p>Rejected. Sampling the active tank is not required in accordance with a previously agreed to strategy (100-HR-1 Work Plan Sec. 4.2.1.2.4)</p>
63.	<p>Sect 5.1.2, pg 5-7, para 3</p> <p>The text incorrectly states that the final RFI report is a secondary document. It is in fact a primary document as should be stated in this paragraph.</p>	<p>Accepted. The RFI Report is a primary document.</p>
64.	<p>Sect 6.0, pg 6-1, para 1</p> <p>The provided work schedule does not include all work described in Chapter 5 of this work plan, as the final remedy is not depicted. This paragraph should be revised to better define the scope of work as detailed on the schedule.</p>	<p>Accepted. Will clarify the first sentence to read: ... the work described in Chapter 5 (through submittal of the IRM Proposed Plan)...</p>

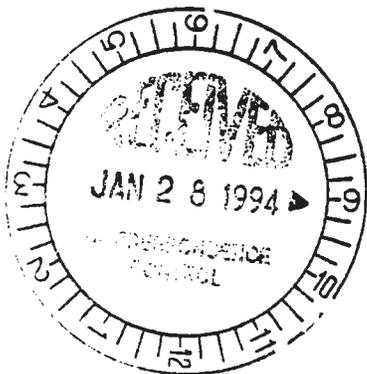
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Subject: SUBMITTAL OF THE 100-HR-2 RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION/CORRECTIVE MEASURES STUDY (RFI/CMS) WORK PLAN, DRAFT A, FOR PUBLIC COMMENT		

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