1226005

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Control #: D4-100N-0061

FACILITY STATUS CHANGE FORM

Date Submitted:	Area:	Control #:
May 15, 2014	100-N	D4-100N-0061
Originator:	**Facility ID:**	
Clay McCurley	D4 Equipment Decontamination Area	
Phone:	**Action Memorandum:**	
942-8928	100-N Ancillary Facilities	

This form documents agreement among the parties listed below on the status of the facility D&D operations and the disposition of underlying soil in accordance with the applicable regulatory decision documents.

Section 1: Facility Status

- ☐ All D4 operations required by action memo complete.
- ☒ D4 operations required by action memo partially complete, remaining operations deferred.

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Description of Completed Activities and Current Conditions:
Completed activities and current conditions are described in Attachment 1.

Description of Deferral (as applicable):
The excavation is being deferred to FR for backfill in mid 2014.

Section 2: Underlying Soil Status

- ☒ No waste site(s) present. No additional actions anticipated.
- ☐ Documented waste site(s) present. Cleanup and closeout to be addressed under Record of Decision.
- ☐ Potential waste site discovered during D4 operations. Waste site identification number <to be> assigned.

  Cleanup and closeout to be addressed under Record of Decision.

Description of Current/As-Left Conditions:
Area is an excavation approximately 2 feet deep surrounded by a flat, level, gravel parking lot.

Identification of Documented Waste Site(s) or Nature of Potential Waste Site Discovery (as applicable):
None identified.

Section 3: List of Attachments

1. Area Information
2. Area Location
3. Correspondence
4. Attachments to Correspondence
5. 100N GPS Survey for D4 Equipment Decontamination Area (Wash Area)

Rudy Guercia — 5/15/14
DOE-RL — Date

Lead Regulator ☐ EPA ☒ Ecology — 5/21/14
Date

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FACILITY STATUS CHANGE FORM

DISTRIBUTION:

EPA: Dennis Faulk, B1-46
Ecology: Wanda Elliott, H0-57
DOE: Rudy Guercia, A3-04
Document Control, H4-11
Administrative Record, H6-08 (100-NR-1 OU)

SIS Coordinator: Benjamin Cowin, H4-22
D4 EPL: Clay McCurley, L4-45
Sample Design/Cleanup Verification: Theresa Howell, H4-23
FR Engineering: Rich Carlson, H4-22
FR EPL: Dan Saueressig, X8-02

Attachment 1

Area Information

Area Information

In late 2012, the deactivation, decontamination, decommissioning, and demolition (D4) of radiologically contaminated facilities in the 100-N Area (e.g., 105N Fuel Storage Basin, 105-NE Fission Products Trap, 1303-N Silos) was almost complete. Several pieces of heavy equipment used to demolish these facilities were still useful and needed elsewhere but required decontamination. Field remediation (FR) crews had already started remediation activities throughout the site and an adequate decontamination area within the 100-N AOC could not be identified. As a result, a decontamination area outside the AOC had to be selected and approved by Ecology. The area selected was a portion of the 100-N parking lot identified in Attachment 2.

Ecology approved use of the parking lot and the cleanup plan in February 2013 (Attachment 3) and the equipment was moved to the area. All equipment was then decontaminated or disposed of at ERDF and the wash area was excavated as agreed. A visual inspection identified no stains or anomalies and a survey using Global Positioning Environmental Radiological Surveyor (GPERS) identified no contamination above 1.5 X background (Attachments 3 and 4). Results of the inspection and survey were provided to Ecology. DOE and Ecology agreed that no sampling would be needed. DOE and Ecology agreed to allow a delay in backfill until mid 2014, simultaneously with other backfill activities in the 100-N Area. A global positioning system (GPS) survey of the D4 equipment decontamination area (wash area) excavation is provided in Attachment 5.

Attachment 2

Area Location

Location of 100-N D4 Equipment
Decontamination Area in 2008
N

Attachment 3

Correspondence

Brown, Leslie A

From: Elliott, Wanda (ECY) <well461@ECY.WA.GOV>
Sent: Monday, April 14, 2014 8:26 AM
To: McCurley, Clay D
Subject: RE: Equipment Decontamination Area request for WCH 100-N D4

Let's just close it out with a FSCF as provided in the RAWPs. That will tie a completed bow on it.

Wanda Elliott
(509) 372-7904
Environmental Scientist
Nuclear Waste Program
Washington State Department of Ecology

From: McCurley, Clay D [mailto:cdmccurl@wch-rcc.com]
Sent: Monday, April 14, 2014 8:15 AM
To: Elliott, Wanda (ECY)
Subject: RE: Equipment Decontamination Area request for WCH 100-N D4

Oh. Now that I think of it, this area (parking lot) is not in the AOC.

From: Elliott, Wanda (ECY) [mailto:well461@ECY.WA.GOV]
Sent: Monday, April 14, 2014 8:08 AM
To: Guercia, Rudolph F; McCurley, Clay D
Cc: Boyd, Alicia; Saueressig, Daniel G
Subject: RE: Equipment Decontamination Area request for WCH 100-N D4

I don't need to see it. If the GPERS shows no contamination and there is no staining or anomalies there is no reason to sample per the RAWP. You can write up a FSCF that provides all the info- this will allow us to close that portion of the AOC.

Wanda Elliott
(509) 372-7904
Environmental Scientist
Nuclear Waste Program
Washington State Department of Ecology

From: Guercia, Rudolph F (Rudy) [mailto:rudolph.guercia@rl.doe.gov]
Sent: Wednesday, April 09, 2014 10:22 AM
To: McCurley, Clay D; Elliott, Wanda (ECY)
Cc: Boyd, Alicia (ECY)
Subject: RE: Equipment Decontamination Area request for WCH 100-N D4

I was out there this morning; pretty innocuous-not sure what sampling will tell us.

R. F. Guercia, Field Engineering
U.S. Dept. of Energy, Richland Operations Office
PH: (509) 376-5494
Fax: (509) 373-0726

From: McCurley, Clay D [mailto:cdmccurl@wch-rcc.com]
Sent: Wednesday, April 09, 2014 9:19 AM
To: Elliott, Wanda; Guercia, Rudolph F (Rudy)
Cc: Boyd, Alicia
Subject: RE: Equipment Decontamination Area request for WCH 100-N D4

Wanda/Rudy.

All equipment from the 100-N D4 Equipment Decontamination Area (Decon Pad) has been dispositioned and the area has been cleaned up. I put together a series of photos and our final GPERS diagrams to document our activities at that location (see attachment).

As agreed in the email string below, the entire area has been downposted and 2-3 feet of soil has been excavated from the area where the actual decontamination (washing) occurred. The excavated soil was disposed of at the ERDF. I performed a visual inspection day before yesterday (Monday, April 7) and observed no staining or anomalies in the excavation. The excavation was surveyed yesterday (Tuesday, April 8) using GPERS and no contamination greater than 1.5 X background was identified (see attachment). Next on the agenda is to determine if the area requires sampling. Let me know what you think.

If you would like to view the Decon Pad, let me know and I'll be happy meet you there or, if you like, I can get a company vehicle and drive us all out there. Let me know when you would like to go.

Thanks. Clay

From: Elliott, Wanda (ECY) [mailto:well461@ECY.WA.GOV]
Sent: Thursday, February 27, 2014 2:11 PM
To: McCurley, Clay D
Cc: Boyd, Alicia; Guercia, Rudolph F
Subject: RE: Equipment Decontamination Area request for WCH 100-N D4

I concur.

Wanda Elliott
(509) 372-7904
Environmental Scientist
Nuclear Waste Program
Washington State Department of Ecology

From: McCurley, Clay D [mailto:cdmccurl@wch-rcc.com]
Sent: Thursday, February 27, 2014 1:40 PM
To: Elliott, Wanda (ECY)
Cc: Boyd, Alicia (ECY); Guercia, Rudolph F
Subject: RE: Equipment Decontamination Area request for WCH 100-N D4

Hi Wanda. We're getting close completing our activities at the 100-N D4 Equipment Decontamination Area and will soon be downposting and cleaning up the area. I'd like to make sure we're all in agreement regarding cleanup. We used only the southern portion of the area for equipment decontamination activities (see dashed white line in attachment). That includes the area where washing actually occurred and several feet out for overspray. The northern portion has been used only to stage equipment. Once all equipment and materials have been removed, D4 will:

1. Downpost the entire area (northern and southern portions) in accordance with Radcon procedures.
2. Remove 2-3 feet of soil (or as much as is necessary) in the area where the equipment was decontaminated (only the southern portion). Dispose of soil at the ERDF.
3. Perform a visual inspection and GPERS survey of the excavation.
4. Review the visual and GPERS results with DOE and Ecology to determine if the area requires sampling. If required, then perform sampling and analysis as specified below.

Do you concur with this?

Thanks. Clay

From: Elliott, Wanda (ECY) [mailto:well461@ECY.WA.GOV]
Sent: Monday, February 04, 2013 8:15 AM
To: Warren, David J
Cc: Guercia, Rudolph F; Boyd, Alicia
Subject: RE: Equipment Decontamination Area request for WCH 100-N D4

We concur.

Wanda Elliott
(509) 372-7904
Environmental Scientist
Nuclear Waste Program
Washington State Department of Ecology

From: Warren, David J [mailto:djwarren@wch-rcc.com]
Sent: Wednesday, January 30, 2013 12:14 PM
To: Elliott, Wanda (ECY); Boyd, Alicia (ECY)
Cc: Guercia, Rudolph F
Subject: Equipment Decontamination Area request for WCH 100-N D4

Wanda/Alicia,

Per section 2.1.8 of the *Removal Action Work Plan for 100-N Area Ancillary Facilities* (DOE/RL-2002-70 Rev.3), WCH is requesting Ecology approval on establishment of an Equipment Decontamination (Decon) Area at the location depicted in the attached figure(s). The equipment to be decontaminated are primarily heavy equipment and attachments that were used in the demolition and excavation of the 105-N Fuel Storage Basin, that same equipment was also used for demolition of the 1303-N, 117-N, 105-NE, and the below grade demolition of the 107-N.

<<decon area request figure.doc>>

Generally when looking for a decon area we try to find a location that is adjacent a facility or waste site where future removal/remediation or soils would also remove any contaminants that may be introduced to the soil during equipment decon activities. Due to the limited amount of real estate available with the FR project ramping up, we were unable to find an area that would fit the above criteria and be out of the way for current and near term FR activities. That being the case, we chose an area that is out of the way of the FR project but also happens to be outside of the Area of Contamination, as identified in the RAWP. Per section 2.1.8 of the RAWP, we will be using only standard industry practices, which includes pressure washing with cold and hot (if needed) clean water, as well as utilizing the following practices to ensure that no contamination remains in the soil once decon activities are complete:

1. Berming around the area to ensure that all potentially contaminated water is contained within boundary
2. Minimizing the use of water to the extent practical
3. Removing 2-3 feet of soil (or as much as is necessary), to remove any contamination that may be introduced to the soil

4. Radiological survey and visual inspection of the area excavated to remove the decon pad
5. As determined by DOE and Ecology, if the decon area requires closure, Sampling and Closeout in accordance with the *100-N Area Sampling and Analysis Plan for CERCLA Waste Sites* (DOE/RL-2005-92) and the *Remedial Design Report/Remedial Action Work Plan for the 100-Area* (DOE/RL-96-17)

Please respond as to whether or not you approve of this Decon Area request. Feel free to contact me if you have any questions. Thanks.

David Warren
100-N D4 Environmental Project Lead
WCH
539-6040

Attachment 4

Attachments to Correspondence

100-N D4 Equipment Decontamination Area (Decon Pad)

Photo 1 – Aerial View of 100-N D4 Decon Pad on 01/15/2014.

Photo 2 – Decon Pad Wash Area on 03/26/2014 (facing southwest).

100-N D4 Equipment Decontamination Area (Decon Pad)

Photo 3 – Decon Pad Wash Area on 03/26/2014 (facing north-northwest).

Photo 4 – Wash Area Excavation on 04/07/2014 (facing north-northwest).

100-N D4 Equipment Decontamination Area (Decon Pad)

Photo 5 – Wash Area Excavation on 04/07/2014 (facing west-northwest).

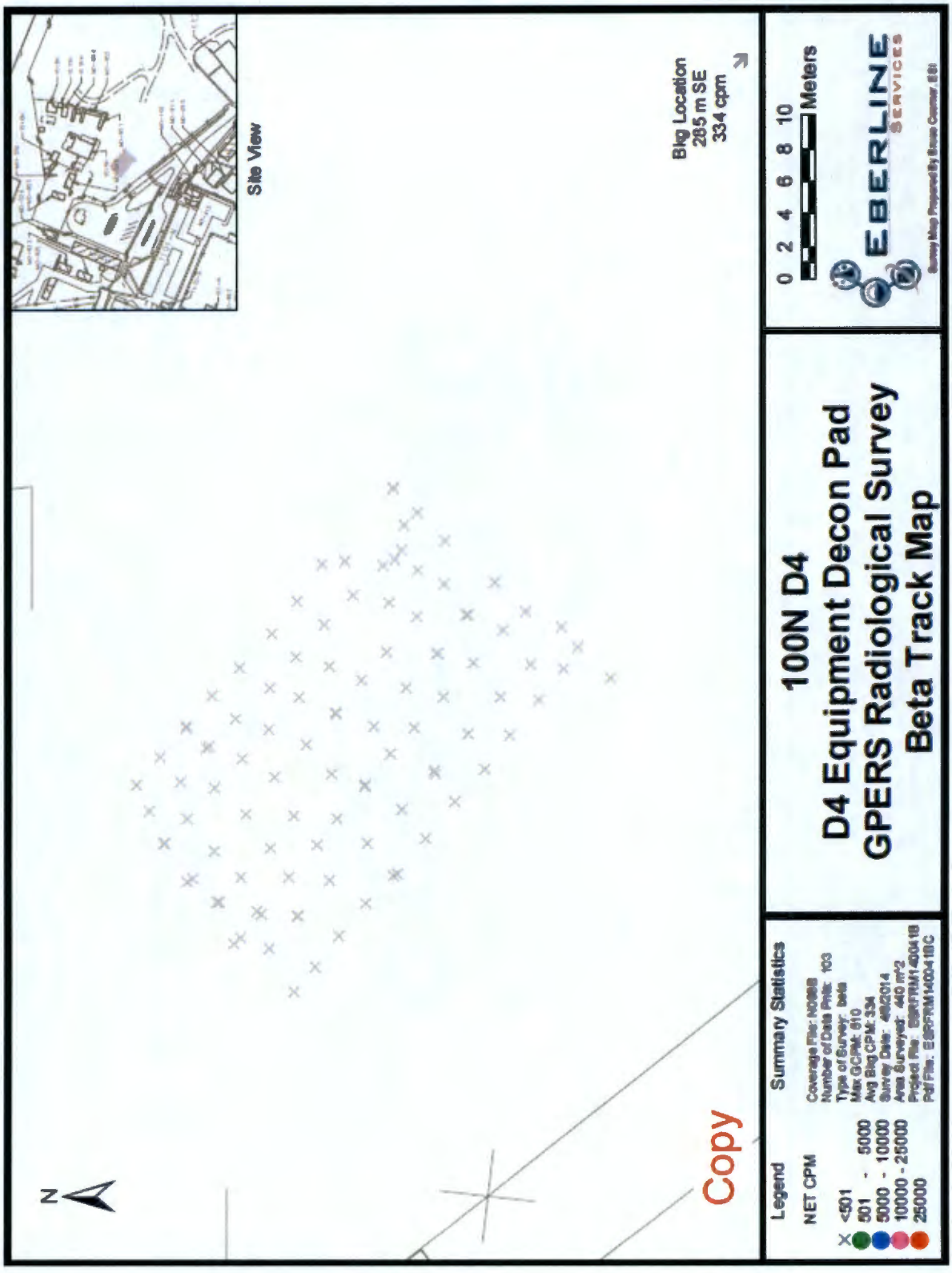
Photo 6 – Wash Area Excavation on 04/07/2014 (facing northeast).

100-N D4 Equipment Decontamination Area (Decon Pad)

Photo 7 – Wash Area Excavation on 04/07/2014 (facing east).

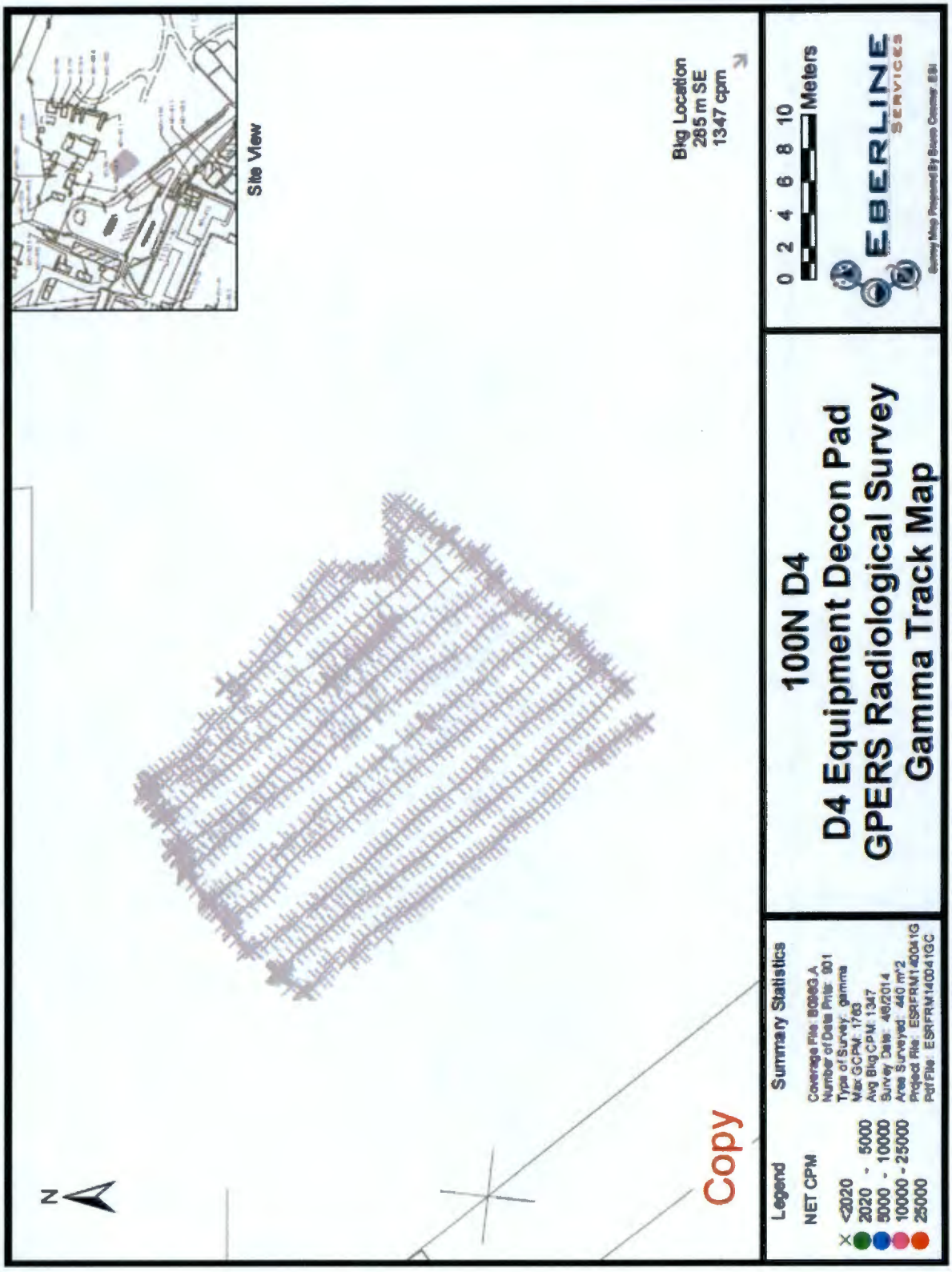
100-N D4 Equipment Decontamination Area (Decon Pad)

Decon Pad GPERS (Beta) on 04/08/2014



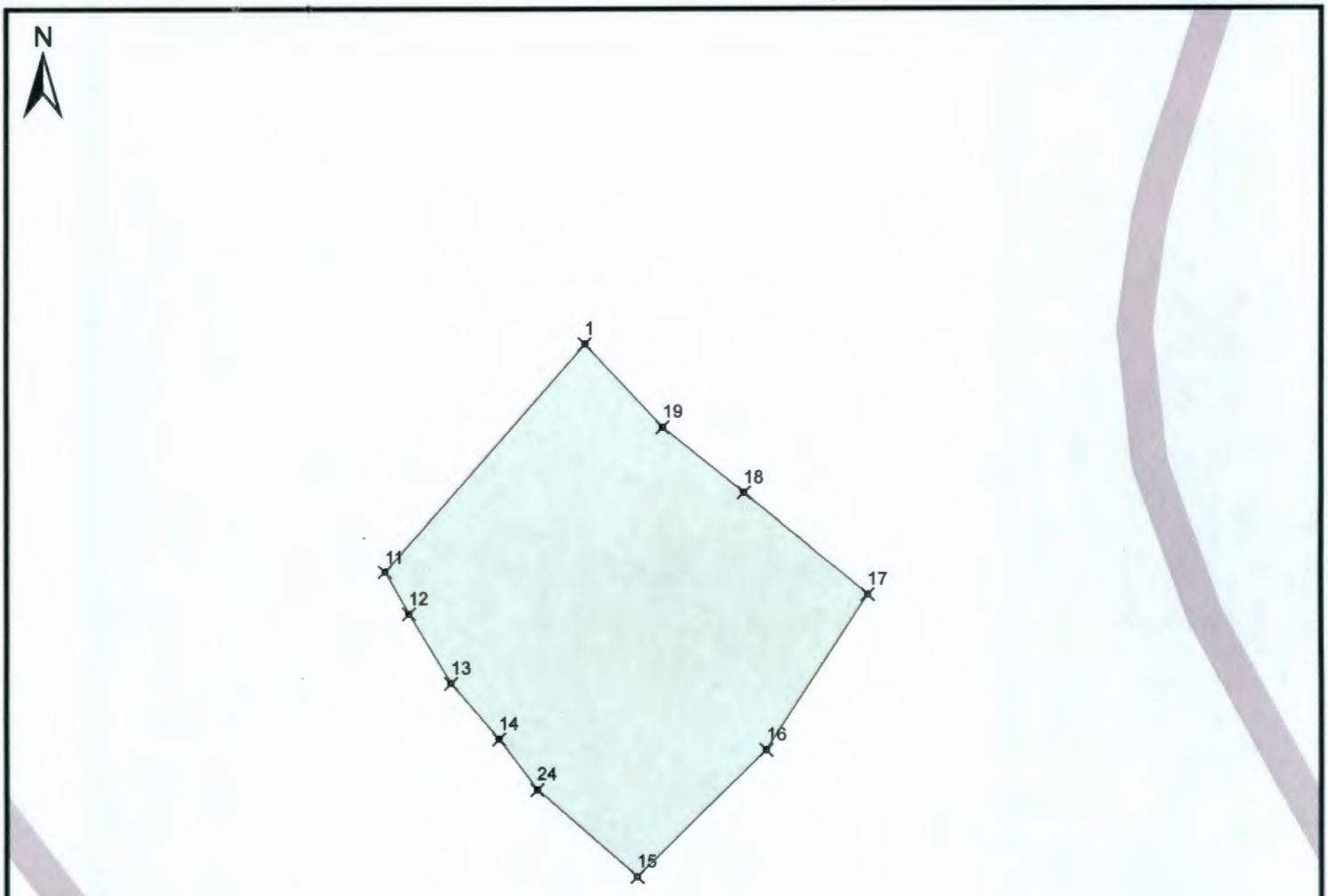
100-N D4 Equipment Decontamination Area (Decon Pad)

Decon Pad GPERS (Gamma) on 04/08/2014

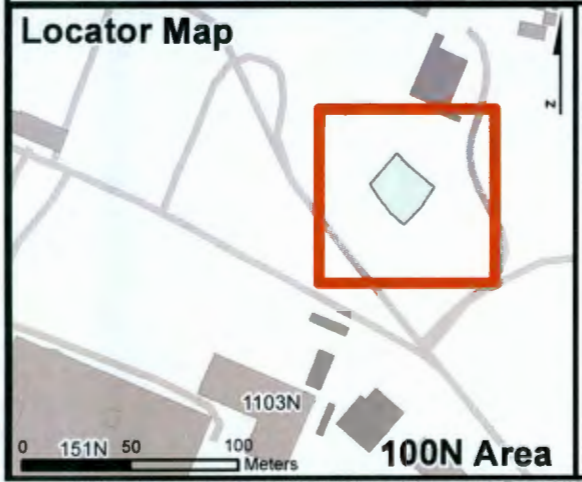


Attachment 5

100N GPS Survey for D4 Equipment Decontamination Area (Wash Area)



Name	Northing	Easting	Elevation
1	149434.144	571505.643	141.329
11	149419.96	571493.24	141.341
12	149417.348	571494.73	141.417
13	149413.076	571497.355	141.425
14	149409.646	571500.319	141.396
15	149401.198	571508.85	141.348
16	149408.981	571516.837	141.307
17	149418.527	571523.043	141.253
18	149424.937	571515.433	141.319
19	149429.009	571510.423	141.352
24	149406.552	571502.691	141.394



100N GPS Survey for D4 Equipment Decontamination Area (Wash Area)

GPS Survey Points 2/26/14

× See Coordinate Description (Above)

Decontamination Area

Roads

0 2.5 5 10 Meters

US State Plane 1983, Zone: Washington South 4602;
NAD83, NAVD88; Units are in Meters

WCH: V:\maaye\ArcMap\100N\100N_washdown.mxd Date: 2/27/2014