U-006-305 .48

5567

K-65 SAND PROJECT U.S. DOE-FERNALD OH6 890 008 976

05/22/89

USEPA DOE-FMPC
2
COMMENTS

5567 Original File Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAY 22 1989

REPLY TO THE ATTENTION OF:
5HR-12

Mr. James A. Reafsnyder
United States Department of Energy
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Re: K-65 Sand Project
U.S. DOE-Fernald
OH6 890 008 976

Dear Mr. Reafsnyder:

In a March 10, 1989, submittal, the United States Department of Energy (U.S. DOE) and Westinghouse proposed an interim stabilization project for silos 1, 2, and 3. This project includes the installation of approximately 4 feet of sand for radon control until final remediation of the tanks is initiated. This activity is considered a removal action (#4) under the National Contingency Plan.

The United States Environmental Protection Agency (U.S. EPA) has the following comments on the proposal:

1. The proposal should include estimates of potential routine and accidental offsite doses.

2. Details for the use and regeneration of the radon treatment system should be included in the proposal. Details for control of radon emissions during the entire sand fill operation should be included.

3. The background monitor should be moved further offsite.

4. Consideration must be given for the use of E-PERM type radon detectors to monitor radon levels in the vicinity of the silos, at the property fence line, and the nearest resident. The detectors should be turned off during non-work periods.

5. There is no explanation of how the four curies criteria for grab sample measurement was developed or what it is intended to limit (worker dose, off-site concentrations, etc.).

6. Attachment 1, Page 2, Item 3: The "downwind" direction is dynamic. Monitors should be installed in four directions to compensate for shifting downwind directions.

7. Doses should be designated as effective dose equivalents, which includes organ and whole body doses.

8. Page 16, Sentence 1: Explain why workers are being given criticality training? Is criticality a credible possibility?

9. Section 6.0: The moisture limit for the sand should be specified in order to assure the proper radon retention times and the projected reductions in radon levels. Moisture monitors should be considered.

10. Figure 3.1.1, Section 7.3: Radon monitors should be placed in all four major compass directions. A monitor is not currently proposed in the southerly direction.

Please contact me at (312) or FTS 886-4436, if there are any questions.

Sincerely,

Catherine A. McCord
Remedial Project Manager

cc: Graham Mitchell, OEPA-SWDO
Maury Walsh, OEPA-CO
Grover Smithwick, U.S. DOE - ORO
Kitty Taimi, U.S. DOE - HDQ
Bruce Boswell, Westinghouse