

**DOE RESPONSES TO U.S. EPA COMMENTS ON THE  
DRAFT INTEGRATED REMEDIAL DESIGN PACKAGE FOR AREA 1, PHASE II  
(REVISION D, SEPTEMBER 1998)**

**GENERAL COMMENTS**

- 1) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: Not Applicable (NA) Pg. #: NA Line #: NA  
 Original General Comment #: 1  
 Comment: The text of the Area 1, Phase II Integrated Remedial Design Package (A1PII IRDP) implementation plan has been reorganized. In some cases, cross-references have not been modified as needed to match the new structure. For instance, line 10 on page 4-9 refers to Section 3.1.1.3 for details on the handling of trees and brush. However, Section 3.1.1.3 no longer exists, and Section 3.1.5.2 is the correct reference. All cross-references should be checked and corrected as necessary.
- Response: Noted.
- Action: All cross-references will be corrected prior to issuance of the Final Implementation Plan upon regulatory approval of the A1PII Supplemental Characterization Package.
- 2) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: Not Applicable (NA) Pg. #: NA Line #: NA  
 Original General Comment #: 2  
 Comment: Some pages of text, especially in Section 3, were photocopied so line numbers in the right-hand margin are wholly or partially missing. Future draft documents should be more carefully photocopied so that line numbers are clear and complete.
- Response: Noted.
- Action: Future draft documents will be more carefully photocopied so that line numbers are clear and readable.
- 3) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: Not Applicable (NA) Pg. #: NA Line #: NA  
 Original General Comment #: 3  
 Comment: Information regarding delineation of soil exceeding the waste acceptance criteria (WAC) in the footprint of the former sewage treatment plant (STP), specific mixing procedures for digester sludge stabilization, and disposal not included. This information should be submitted to the regulatory agencies for review and approval as soon as it is available.
- Response: All of the identified issues are addressed in the A1PII Supplemental Characterization Package.
- Action: Figures contained in the Supplemental Characterization Package clearly present the data, modeling results and excavation limits for above WAC material in the STP footprint. Sampling and analysis was performed on both the digester sludge and the associated debris. The analytical results and the disposition plan for the digester sludge and associated debris are summarized in the white paper that is presented in

Attachment 1 of the Supplemental Characterization Package. As described in the white paper, the digester sludge will be stabilized with above-WAC technetium-99 contaminated soil from the STP area and subsequently disposed offsite. The construction requirements for stabilizing the digester sludge are presented in Section 02205 of Revision 0 of the STP Excavation technical specifications. The associated debris will be visually inspected to determine its disposition; debris with no visible residue mass will be disposed in the OSDF; debris with visible digester sludge residue mass will either be cleaned or dispositioned off site.

Action: The required information is presented in the A1PII Supplemental Characterization Package and Revision 0 of the STP Excavation technical specifications.

**SPECIFIC COMMENTS**

1) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: 2.3.2.2 Pg. #: 2-28 and 2-29 Line #: NA  
 Original Specific Comment #: 1

Comment: The text discusses Phase 3 sampling to delineate technetium-99 contamination and refers to 41 sampling locations. However, the table in Appendix B-4 and Figure 2-23 indicate 46 sampling locations for Phase 3. The text should be revised to resolve this discrepancy. In addition, the text on page 2-28 provides no discussion of analytical results for samples collected from sampling locations 70 through 76. This information should be included.

Response: The A1PII Supplemental Characterization Package presents and summarizes the data and excavation limits for technetium-99 in the STP area. Text and figures in that package describe the sampling data and evaluation process that was used to establish the limits of above-WAC technetium-99 contaminated soil.

Action: The required information is presented in the A1PII Supplemental Characterization Package.

2) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: 2.3.2.3 Pg. #: 2-30 Line #: 26  
 Original Specific Comment #: 2

Comment: The text has been corrected to use the term "detection quantitation limit" as a result of U.S. Environmental Protection Agency's (U.S. EPA) Original Specific Comment No. 14 on the November 1997 IRDP. The word "detection" should be deleted from this term.

Response: Noted.

Action: The word "detection" will be deleted from the term "detection quantitation limit" in future submittals.

3) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: 3.2.2.1 Pg. #: 3-14 Line #: 16 and 17  
 Original Specific Comment #: 3

Comment: The text states that stabilized digester sludge and other technetium-99 contaminated soil will be separated from uranium-contaminated soil in Soil Pile (SP-)7. The cover letter indicates that the two contaminated soil areas will be separated by a ditch to prevent

runoff from the technetium-99 soil from contaminating the uranium-contaminated soil. The material excavated to create the ditch will then be used to construct a berm between the two areas. It is not clear why these controls are necessary given the fact that the U.S. Department of Energy (DOE) plans to ship all stockpiled material in SP-7 off site for disposal in Fiscal Year 1999. The text should be revised to address this issue.

Response: See response to OEPA Comment #10.

Action: See action for OEPA Comment #10.

- 4) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: 3.2.5 Pg. #: 3-19 Line #: NA  
 Original Specific Comment #: 4  
 Comment: The second and third paragraphs of this section are repetitive. One of the two paragraphs should be omitted.

Response: Noted.

Action: The second paragraph will be deleted prior to issuance of the Final Implementation Plan.

- 5) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: 3.2.5.3 Pg. #: 3-22 Line #: NA  
 Original Specific Comment #: 5  
 Comment: The text states that the radiation scanning system (RSS) will be used to scan the perimeter and floor of the sludge drying bed excavation to confirm that above-WAC material is not present. It is likely that the RSS will be used for the same purpose in other STP areas during remediation. Although procedures for using the RSS have been incorporated into the User's Manual, calibration information has not yet been provided to the regulatory agencies for review and approval. This information should be provided in a comparability or other document before the RSS is used during STP remediation activities.

Response: Calibration information is being developed for the RSS. This information will be presented to regulatory agencies for review prior to use in the A1PII project. No equipment will be used for certification until it is approved by the regulatory agencies.

Action: Calibration information for the RSS will be submitted to regulatory agencies.

- 6) Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: Appendix B-2 Pg. #: NA Line #: NA  
 Original Specific Comment #: 6  
 Comment: U.S. EPA's Original Specific Comment No. 7 on the November 1997 IRDP requests that undefined, nonstandard data qualifiers, such as "NV," in Appendix B be defined. However, all isotopic data in the Appendix B-2 table are still qualified as "NV," and no definition of the qualifier is provided. The table should be revised to include a definition of this and all other data qualifiers used in the table.

Response: "NV" is the abbreviation for "not validated."

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Action: A table with data qualifiers will be included with future submissions to the regulatory agencies.

7) Commenting Organization: U.S. EPA Commentor: Saric  
Section #: Appendix B-4 Pg. #: 1 Line #: NA  
Original Specific Comment #: 7

Comment: The result for sample "A1P2TC-50-2-R" is noted as "<MDL," but all other similar results are listed as "<MDC." This discrepancy should be corrected and the acronym used should be defined.

Response: "MDL" is the acronym for "minimum detection limit", "MDC" is the acronym for "minimum detectable quantity". Both acronyms mean the same thing.

Action: All acronyms will be defined prior to issuance of the final Implementation Plan.

8) Commenting Organization: U.S. EPA Commentor: Saric  
Specification #: 02205 Pg. #: NA Line #: NA  
Original Specific Comment #: 8

Comment: U.S. EPA's Original Specific Comment No. 26 on the November 1997 IRDP notes that the removal of old agricultural drainage tile is not discussed in this specification. DOE's response states that Specification 02205 will be modified to include removal of agricultural drainage tiles. However, the text of Specification 02205 has not been modified to include this information. Section 3.5 of this specification should be modified to include the removal and handling of agricultural drainage tiles. Also, for consistency with page 3-16 of the implementation plan, the specification should state that the excavations will not be extended to remove drainage tiles that may be present beyond excavation limits.

Response: The process for handling agricultural drainage tile was inadvertently omitted from Section 02205 of the STP Excavation technical specifications.

Action: The removal and handling of agricultural drainage tile will be added to Section 02205 via DCN. This will describe a process that is consistent with the approach presented in the Implementation Plan; excavation and removal of agricultural drainage tile will extend to the excavation limits to reach FRLs.

9) Commenting Organization: U.S. EPA Commentor: Saric  
Specification #: 15160 Pg. #: 1 Line #: NA  
Original Specific Comment #: 9

Comment: The text of Section 1.1 refers to three pumps, PMP-1 through PMP-3. However, other sections of the IRDP, such as Section 3.3 of the Systems Plan (Appendix D of the implementation plan), refer to a fourth pump, PMP-4. This discrepancy should be reconciled.

Response: Section 15160 is correct in specifying three pumps. Revision 0A of the Systems Plan was not updated to the final configuration when it was submitted with the draft IRDP.

Action: Revision 0 of the Systems Plan was revised to reflect the current design of three pumps.

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