



**Rocky Mountain
Remediation Services, L L C**
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**INTEROFFICE
CORRESPONDENCE**

**CORRES. CONTROL
LTR NO**

K-H Corres #

March 19, 1998

Originator Ltr Log #
CLG-013-98

Chris Gilbreath, CDPHE, T119A, X6687

98 - RF -

Paul Valentinielli, E/C/D/F, T130F, X6047 *PV*

**RESPONSE TO COMMENTS ON THE SOIL SAMPLING AND ANALYSIS PLAN
TO CHARACTERIZE IHSSs 121 AND 148 AT BUILDING 123 (rev 0),
FEBRUARY 1998 - CLG-013-98**

DIST	LTR	ENC
BENSON, C A		
CARMEAN C H		
CRAWFORD, A C		
DAWSON D		
EDWARDS J D		
FINDLEY M E		
FITZ, R C		
GUINN, L A		
HUGHES F P		
LAW J E		
MITTLESTADT D R		
OVERLID, T W		
PATTERSON J W		
SUTTON, S R		
WHEELER, M		

use of this letter is in response to comments made on the Soil Sampling and Analysis Plan
to characterize IHSSs 121 and 148 at Building 123

SECTION

are the resolutions to comments made on the Building 123 SAP

NOTE:

In addition to Section 6 0 - Quality Assurance improve this section considerably. Some
of the commitments to QA/QC are to follow referenced procedures and guidance documents
which are not readily available to the regulatory agencies. To be able to completely
evaluate these commitments, CDPHE needs to be able to review these documents. The
following are of particular interest:

- Rocky Flats Administrative Procedure 2-G32-ER-ADM-08 02, *Evaluation of ERM Data for Usability in Final Reports,*
- RMRS Quality Assurance Program (Implementation of 10 CFR 830 120)
- 1-31000-COOP-01, *Conduct of Operations,*
- 1-31000-COOP-11, *Pre-Evolution Briefing,*
- Corrective Action Process (CAP),
- RMRS QA-03 01, *Corrective Action procedure,*
- Site Procedures 1-D23-QAP-10 02, *Inspection,*
- 1-31000-COOP-19, *Returning Systems and Equipment to Service,*
- 1-V51-COEM-DES-210, *Design Process Requirements,*
- 1-I97-ADM-12 01, *Control of Measuring and Test Equipment*

SECTION:

Copies of the listed documents will be provided for review

NOTE:

Section 6 11, Analytical Data states that data validation will be performed. Since data
validation has not always been reported in the past, CDPHE needs to be able to review
this information when it becomes available.

SECTION:

The information will be provided when available

ADMIN. RECORDS	X
RMRS RECORDS	X
CONTROL	
TRAFFIC	
PATS/T130G	
CLASSIFICATION	
UCNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER

SIGNATURE

Date

NON REPLY TO RF CC NO

ACTION ITEM STATUS

PARTIAL/OPEN

CLOSED

TR APPROVALS

ORIG & TYPIST INITIALS

PV hed



ADMIN RECORD
B123-A-00058



INTEROFFICE CORRESPONDENCE

DATE March 19, 1998
TO Chris Gilbreath, CDPHE, T119A, X6687
FROM Paul Valentinelli, E/C/D/F, T130F, X6047 *PV*
SUBJECT RESPONSE TO COMMENTS ON THE SOIL SAMPLING AND ANALYSIS PLAN
TO CHARACTERIZE IHSSs 121 AND 148 AT BUILDING 123 (rev 0),
FEBRUARY 1998 - CLG-013-98

PURPOSE

The purpose of this letter is in response to comments made on the Soil Sampling and Analysis Plan to Characterize IHSSs 121 and 148 at Building 123

DISCUSSION

Listed below are the resolutions to comments made on the Building 123 SAP

COMMENT:

- 1 The additions to Section 6 0 - Quality Assurance improve this section considerably. Some of the commitments to QA/QC are to follow referenced procedures and guidance documents which are not readily available to the regulatory agencies. To be able to completely evaluate these commitments, CDPHE needs to be able to review these documents. The following are of particular interest:

Rocky Flats Administrative Procedure 2-G32-ER-ADM-08 02, *Evaluation of ERM Data for Usability in Final Reports*,
RMRS Quality Assurance Program (Implementation of 10 CFR 830 120)
1-31000-COOP-01, *Conduct of Operations*,
1-31000-COOP-11, *Pre-Evolution Briefing*,
Corrective Action Process (CAP),
RMRS QA-03 01, *Corrective Action procedure*,
Site Procedures 1-D23-QAP-10 02, *Inspection*,
1-31000-COOP-19, *Returning Systems and Equipment to Service*,
1-V51-COEM-DES-210, *Design Process Requirements*,
1-I97-ADM-12 01, *Control of Measuring and Test Equipment*

Resolution:

- Copies of the listed documents will be provided for review

Comment:

- 2 Section 6 11, Analytical Data states that data validation will be performed. Since data validation has not always been reported in the past, CDPHE needs to be able to review this information when it becomes available.

Resolution.

- The information will be provided when available

Comment:

- 3 The PARCC parameters are mentioned in Section 6.11, but the discussion of them is disorganized and incomplete. Two parameters, precision and accuracy, are the titles of the next two sub-sections. Two other parameters, comparability and completeness, are discussed under the accuracy sub-section. Representativeness is not discussed at all. All five parameters should be included, either within Section 6.11 or under a separate PARCC sub-section.

Resolution:

- The text has been modified to provide additional information and clarification.

Comment:

- 4 The additional activities discussed in Section 8.0 need to focus on issues pertinent to the Soil Sampling and Analysis Plan. Is it anticipated that the soil sampling prescribed in this document will generate waste (e.g., IDW) and how will it be dispositioned?

Resolution:

- The text has been modified to reflect waste dispositioning.

RESPONSE REQUIREMENTS

No response is necessary. If you have any questions, call me at the above extension.

hed

cc

C L Guthrie, RMRS
T Hopkins, RMRS
M T Aycock, SEG CO