TELEFAX COVER SHEET

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ADMIN RECORD

B779-A-000186

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779 DOP Comments

GENERAL COMMENTS:

Add an additional floor plan of all levels and room numbers that are associated with 3.1.2 Decommissioning Work Area Description. Is there only two levels to building 779. From the listing of the rooms is seem to only indicated a first and second floor.

There was mentioned at the October 6, 1997, meeting that a new technology (container(s)) was being considered -- Six Pack containers, in Appendix B, 1.4 Emerging Technologies there was no mention of these containers -- there should be some mention of the possibility of using this technology and what progress has been made and the obstacles to over come and the benefits to the site.

EPA is interested in obtaining copies of work plan type documents, ie. PEP, RLCR, RSOPs, etc... that are developed with regard to building 779. EPA does not want copies of specific activity base documents like IWCPs. Unless, specifically requested.

SPECIFIC COMMENTS:

Table 3-2 on page 37 it discusses the "zero" added beryllium for excess equipment. EPA feels that a more stringent standard be applied to surface contamination. On page 51 a lower limit is being considered -- the site might use that as a marketing technique to indicate that a more stringent protocols will be instituted to protect the R.F. employees and the surrounding community. When facing the Be in building 779.

Section 5.0, Page 47: The use of 25 µg/Ft2 is not referenced to appropriate documents nor is the derivation of this value explained. Since this value is site specific, an explanation or reference to the appropriate documents that derive this value is needed in this Section.

Section 5.0, Page 47: Will lead materials be checked for leach ability by TCLP methodology ? Computer modeling may not be applicable substitute for actual laboratory analysis of materials leach ability from building surfaces.

Section 5.0, Page 47: Within the sentence dealing with "..appropriate dose models.." please include NRC's D and D (interim release 1.0).

Section 5.1, Page 48: "Non-impacted areas": Due to recent events surrounding unknown contamination on trailers not suspected to be contaminated but with contamination present, it is highly recommended that all materials be classified under "Class 3" and eliminate this last classification area. All materials should be construed as being contaminated until proven clean. Even for areas that have no history of containing potential contamination.

5.3 Be Release Criteria - last sentence -- There is reference to airborne limits. First, the units should be "mg/m^3" not in "mg/m^2". Second, the concentrations listed are not accurate -- please see the June 1994, NIOSH Pocket Guide to Chemical Hazards. In there they reference the NIOSH and OSHA Exposure limits.

5. Section 5.3, Page 51: Use the most current NIOSH, OSHA, ACGIH exposure limits for airborne beryllium. The values listed in this paragraph are erroneous both with units (µg/m3 not µg/m2) as well as with the values cited.

8.7 Waste Management Strategy 3rd para. First bullet -- this bullet need to indicated that swipes were taken during the reconnaissance level Characterization and from that data the rooms are considered non-contaminated and therefore suitable for dispositioning.

Section 8.9, Page 67: Will the PCB contaminated soils be analyzed for radiological contamination (i.e. mixed waste) ?

9.1.1 RCRA Closure Requirements under TRU Mixed Waste -- There is reference to the one gram standard -- Does this mean that no more than one gram of Pu can be associated with a RCRA unit? Not matter what the size or is there a weight per unit volume associated with the one gram standard?

Appendix B page B-8, last para - first sentence -- the would "should" needs to be replaced with "will".