

Comments on Documentation Submitted in Support
of Restart of IM/IRA Construction at 881 Hillside

881 Hillside Work Procedures; Construction and Drilling. Under item 4 of the prerequisites, it is stated that high volume air samplers will be checked with an alpha scanner at the end of each day when earth moving is done. As this is an attempt to provide qualitative real-time analysis of radioactive air monitoring, the alpha scan requirement should have an associated protocol and criteria for use in evaluating this information. For example, how will this information be used? What procedures are in place to compare the information resulting from the alpha scan to background? Under what circumstances will this information be used to shut down the construction or drilling operation?

881 Hillside, Operable Unit 1, Quality Assurance Project Plan (Drilling). Section 5.1 outlines the approach and key assumptions which are to be followed to meet the objectives of the drilling program. It is stated that no geochemical analyses or packer test will be taken from the borings along the influent/effluent line. This is not in accordance with the January, 1990 Final IM/IRA Plan and Decision Document. Within the Final Decision Document it stated that soils will be sampled along the proposed piping alignment in order to determine the final disposition of the excavated soils.

Abandonment of boreholes must be in accordance with applicable requirements.

Within section 5.2 it is stated that back pressure permeability tests will be performed on approximately 10 bedrock units. Is this statement supposed to state that back pressure permeability tests will be performed on approximately 10 bedrock samples?

Section 5.2 states that double packer tests will be conducted at various intervals within the bedrock portion of the boreholes. This statement must be justified in light of the fact that the January, 1990 Final Decision Document states that single packer injection apparatus will be used.

Section 5.2 states that temporary casings will be installed to insure that the borehole stays open prior to conducting the packer testing. A conservative maximum time limit should be placed on the period between completing the borehole and performing the packer test so as to minimize the potential for migration of contaminants from the alluvial system into the bedrock system.