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90-RF-7269

Robert M Nelson, Jr
Manager
DOE, RFO

**SUBMITTAL OF PUBLIC COMMENT RESPONSIVENESS SUMMARY FOR THE SURFACE WATER
IM/IRA PLAN FOR OPERABLE UNIT NO 2**

Enclosed is a copy of the Public Comment Responsiveness Summary pertaining to the Surface Water Interim Measures/Interim Remedial Action Plan and Decision Document for Operable Unit No 2

The most significant issue that arose from the public comments was the objection to the proposed interbasin transfer of Woman Creek seepage to the South Walnut Creek drainage where it is proposed that the water be treated and discharged. The main technical reason for this objection is that the seeps near the 903 Pad are considerably more contaminated with plutonium and americium than are the waters of either Woman Creek or South Walnut Creek, further, several commentors expressed uncertainty regarding the plutonium and americium removal efficiency of the proposed treatment system. Consequently, some commentors felt that this plan introduced a potential for degradation of the South Walnut Creek water quality.

The efficiency of the proposed system for removal of plutonium and americium can be demonstrated through bench-scale treatability studies. Due to the fact that the Woman Creek seeps are dry at this time of year, representative seep water suitable for use in treatability studies may not be available until March 1991. Thus, selection of an IRA for the Woman Creek seeps must be deferred until mid-1991, if this design is to benefit from the data gathered from the treatability studies.

Therefore, EG&G and RFO/ERD staff have decided on several changes to the IM/IRAP

- 1) Neither untreated nor treated waters originating from 903 Area seeps will be transferred from Woman Creek to Walnut Creek as part of this interim action
- 2) The facilities for treating Woman Creek waters will not be defined until after treatability study data are available

ADMIN RECORD

"REVIEWED FOR CLASSIFICATION
By [Signature]
Date 10/01/91"

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3) An IM/IRAP/Decision Document addendum will be prepared and submitted during the summer of 1991 This document will deal exclusively with control of the Woman Creek seeps

4) The existing IM/IRAP will be modified to deal with use of the initially proposed treatment facility for Walnut Creek sources only

RFO/ERD staff has discussed these proposed changes with EPA/CDH and found that the agencies are receptive to our making such a submittal at this time ER/RPD staff has discussed these matters with Frazer Lockhart, who has expressed David P Simonson's support for these measures

For further information, please contact Gary Anderson at extension 5747 or Tom Greengard at extension 7121

J M Kersh
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Orig and 1 cc - R M Nelson, Jr

Enclosure
As Stated