

Colorado Department of Health  
Hazardous Materials & Waste Management Division  
Comments  
on  
FINAL  
RFI/RI WORK PLAN  
FOR  
OU-12  
(400/800 Area)  
ROCKY FLATS PLANT  
OCTOBER, 1992

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General Comments:

The Division notes that several SOPs are under development or revision. These must be approved before the specific segment of the FSP begins. Collection of samples or data without an approved SOP may result in the rejection of the resulting data.

Specific Comments:

Section 2.4.2.2: DOE's comparisons of contaminant concentration levels to maximum background concentrations is inappropriate. Since a maximum background value may be an anomaly any comparison should be made to the upper tolerance limits of the background data not the maximum concentration.

Figure 2-3: The storm drains added to this figure as a result of the June 1992 site visit have not been included in the explanation. Please add.

Section 3.0: We previously asked that our comments to the Chemical-Specific Benchmark Tables (Gary Baughman to Martin Hestmark, cc'd to Rich Schassburger, dated June 12, 1992) be incorporated into the final workplan version. Though some of the comments have been addressed, many remain unresolved. Until the Benchmark tables are fully amended, the Division will be unable to grant unrestricted and final approval to this workplan. Please

contact the Division for a list of those comments that remain unresolved.

Section 6.3.3.1: The Division notes that Figure 6-1 does not show NaI probe nor asphalt sample locations within the boundaries of the West Cooling Tower Pond (IHSS 136.1) while such stations are shown for the adjoining West Loading Dock (IHSS 116.1) and the soil covered East Cooling Tower Pond (IHSS 136.2). However, we acknowledge that the potential for radionuclides upon the asphalt surface of the West Loading Dock warrants the stations while suspected burial of radionuclides beneath the pavement at IHSS 116.1 would be of little value. Also, the lack of pavement at the East Cooling Tower Pond favors the use of the NaI probe.

Section 6.3.1.2 and 6.3.2.2: The Division recognizes that the proposed monitoring wells for the loading docks (IHSSs 116.1 and 116.2) are prescribed by the IAG. Although their immediate need specific to the units may be questioned, it is desirable to have at least these two wells within the Operable Unit and covered by the budget. The Division expects that "dependent" wells at the other IHSSs are being budgeted under this RFI/RI.

Section 6.3.4.1: The Division notes that the FSP for this IHSS does not specify duplicate surficial soil sampling to confirm laboratory HPGe results comparable to the previous IHSSs. However, we acknowledge that confirmation of laboratory HPGe results need not be IHSS specific, and that the proposed subset of duplicates should be adequate to confirm laboratory HPGe results.

Section 6.3.5.1: The statement in the first paragraph that nine tripod-mounted HPGe locations will be used to supplement the vehicle-mounted HPGe is misleading. Six of the nine sites are specific to the East Cooling Tower Pond (IHSS 136.2). DOE must ensure that 100% coverage is afforded by the three proposed methods.

Section 6.3.9.1: From the first paragraph, page 36, it is unclear how or where the subset of two subsurface samples will be obtained. Will they be taken from beneath the paved portion of the site?

Section 6.3.10: The statement is made in the first paragraph that the "steel boxes containing depleted uranium will be removed prior to conducting any sampling at this IHSS." Consequently, the FSP as shown on Figure 6-11 must be altered and expanded. A revised Figure 6-11 is attached which shows the addition of two sites and the relocation of a third site.

Section 6.4.5: Regarding the Kansas Soil Sampler, DOE must ensure that an approved SOP is available to field personnel prior to initiating the specific activity.

REVISION NO. 0

FILE NAME 40103\F01-611.DWG

DATE 9/30/92

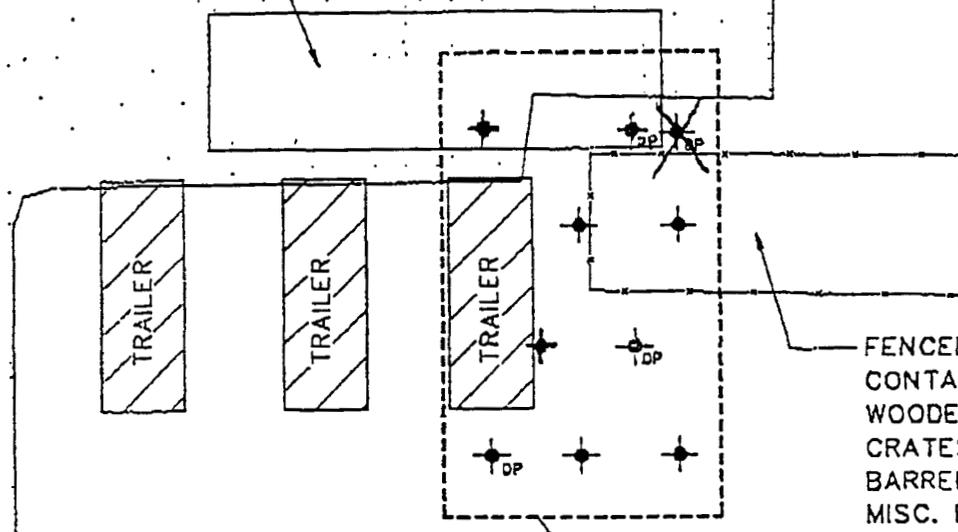
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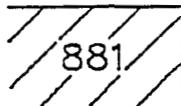
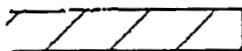


AREA CONTAINING  
STEEL BOXES HOLDING  
DEPLETED URANIUM



FENCED AREA  
CONTAINING  
WOODEN PACKING  
CRATES, EMPTY  
BARRELS, AND  
MISC. EQUIPMENT

IHSS 147.2



EXPLANATION



BUILDING



IHSS BOUNDARY



PAVEMENT



SOIL OR GRAVEL



FENCE



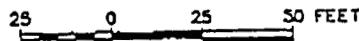
TRIPOD MOUNTED HPGE  
RADIATION SURVEY



SURFICIAL SOIL/DEPTH  
PROFILE SAMPLING LOCATION



DEPTH PROFILE SAMPLE  
LOCATION



IHSS 147.2

Activity	Number
Radiation Survey	7
Nal Probe	at anomalous HPGe readings
Depth Profile	3
Surficial Soils (25-ft grid)	7

NOTE: LOCATION OF PHYSICAL SITE  
FEATURES ARE APPROXIMATE

PREPARED FOR  
U.S. DEPARTMENT OF ENERGY  
ROCKY FLATS PLANT  
GOLDEN, COLORADO

FIGURE 6-11  
FIELD SAMPLING PLAN FOR  
IHSS 147.2-BUILDING 881  
CONVERSION ACTIVITY