

Colorado Department of Health**Review and Comment**

**Draft Phase I RFI/RI Work Plan for OU 14
September, 1992**

General Comments :

1. Utility site plans and maps presented for the OU 14 IHSSs in Section 6 should be of a larger scale that is readily readable by contractors in the field.
2. Please review the entire FSP (Section 6) and ensure that it is consistent with CDH correspondence of 9/1/92 regarding Soil Sampling Methodology for Industrialized Area OUs (Gary Baughman to Frazer Lockhart). Change the FSP where needed.
3. The Division suggests that the number of surficial soil samples required in each IHSS be determined analytically. This may very well result in a lesser amount of sampling and testing required to characterize the surface of the OU 14 IHSSs.
4. Each IHSS description in Section 2.2 should have an approximate area in square feet indicated (example: the text for IHSS 131). The Division would like this number to cross-check the adequacy of the surficial soil samples and borings proposed.

Specific Comments :**2.2 OU 14 Background:****Page 2-6:**

The location of IHSS 131 should be investigated and documented. This is a specific requirement of Table 5 of the Statement of Work (SOW) portion of the IAG. The second paragraph of this section of the text says: "Radiological surveys detected plutonium contamination on three sides of Building 776" and the third paragraph states: "The current location of this IHSS is on the north side of Building 776." Obviously, there remain discrepancies on the site location which should be one of the primary goals of

this workplan.

Page 2-7 & 2-8:

For IHSSs 160 and 161, the Workplan should determine and verify the destination of the soils excavated during the removal activities in the early 1970s. As mentioned above, this is a specific requirement of the IAG SOW in Table 5. This workplan does not address this task.

Page 2-9:

IHSS 162 in Figure 2-7 is located "from the north end of Building 776 to the north end of Building 881", while in the paragraph 2.2.5 is located "from the south end of Building 771 to the north end of Building 850". In addition, paragraph 2.2.6 indicates, that "the origin of the slab was from Building 776." However, the Figure 2-7 description says "a radioactively contaminated slab from Building 771". Please address these apparent inconsistencies.

Figure 2-1 through 2-6:

These figures were developed for OU 12 and need to be expanded for use in this workplan. Maps and cross-sections of this nature should cover all OU 14 IHSSs. In addition, please correct the spelling of the word 'contour' in the title blocks of Figure 2-5 and 2-6.

Figure 2-30:

The site conceptual model needs to be completed with the cross sectional diagram of a typical IHSS showing the range of potential exposure pathways.

Page 5-10:

In order to calculate the PRGs, future land-use must be assumed to be residential, not industrial.

Section 6.4.2:

This section should be completed by the following: All samples shall be analyzed for total plutonium, total americium, uranium 233/234, uranium 235, uranium 238, gross alpha and gross beta.

Page 6-5:

The second sentence on this page needs to be explained more fully in order for the Division to understand the procedure.

Section 6.3:

Task 1 should describe the strategy for locating all borings and other field activities.

Sections 6.3.1 & 6.5.3:

Please include pertinent points presented in our letter of 9/1/92 (copy is attached to these Comments) in these sections.

Section 6.5.3:

The second paragraph of this section should be moved to Section 6.5.2.

Page 6-22:

The first paragraph reference to EMD OP FO.8 should refer to EMD OP FO.23 instead, with remark: 'not yet approved, but under development'.

Figure 6-3:

Most of the 2" surface scrapes are shown on 25' centers in lieu of 50' centers. Unless there is a special reason to supersede the IAG requirements for this IHSS, DOE can delete as many as 54 of the 2" surface scrapes. If a special reason exists for the additional samples, please add text detailing the situation.

Table 6-1A:

Take out 'TM1' from the first box and replace with 'agency update of any change to workplan required by additional data'.