

PRELIMINARY DRAFT

PUBLIC COMMENT RESPONSIVENESS SUMMARY FOR THE PROPOSED PLAN/DRAFT MODIFICATION OF COLORADO HAZARDOUS WASTE PERMIT FOR ROCKY FLATS PLANT OPERABLE UNIT 16: LOW PRIORITY SITES

Ronald Harlan's Comments:

Comment 1 (Page 7, lines 1 & 2):

How was the exposure pathway broken for each of the five sites?

Response 1:

A brief explanation was provided during the Public Hearing in response to Mr. Harlan's question. A detailed discussion of exposure pathways for each Individual Hazardous Substance Site (IHSS) is provided within the "No Further Action Justification" Document for Operable Unit 16 (OU 16) and is summarized within the "Proposed Plan/Draft Modification of Colorado Hazardous Waste Permit for Rocky Flats Operable Unit 16: Low Priority Sites" (Proposed Plan). Both of these documents are available to the Public at the various Information Repositories for Rocky Flats Plant.

Comment 2 (Page 10, line 1):

What metals were there that are of concern within IHSS 197?

Response 2:

Scrap metal from Rocky Flats Plant construction activities were buried within IHSS 197.

Comment 3 (Page 10, Lines 8 & 9 and Lines 12 & 13):

What needs further investigation in IHSS 197 and when will further investigation be conducted?

Response 3:

Since there is scrap metal buried within IHSS 197 a potential source of contamination may exist and must be investigated. IHSS 197 has been transferred from OU 16 to OU 13 (100 Area) so that further investigation can be conducted and closure of OU 16 IHSSs can proceed. Further investigation of IHSS 197 is ongoing; radiation surveys within IHSS 197 have already been completed as part of OU 13.

Ken Korkia's Comments:

Comment 4 (Page 11, Lines 18 through 21):

Do the four parts of the exposure pathway have to be complete under the current situation or does the Proposed Plan take into consideration the hypothetical future uses that could lead to a population that may some day be exposed?

Response 4:

Future use is considered when applying the conceptual model, which contains the four parts of the exposure pathway, within the No Further Action Justification Document for OU 16.

Comment 5 (Page 11, lines 22 through 25 and Page 12, lines 1 & 2):

If you have an underground or ground-water contamination, and you know that there is definite levels of contamination, but you know that no one is currently using that source of ground water, would that be a case where you wouldn't have to clean up that source of ground water?

Response 5:

If underground and/or ground-water contamination were present DOE would consider future use, and EPA and CDH would require consideration of future use, in order to protect the Public, the Workers and the Environment.

Comment 6 (Page 12, lines 11 & 12 and line 18):

What is the source of tritium within the IHSS 194 steam condensate and is the concentration of Tritium within the IHSS 194 steam condensate higher than normal?

Response 6:

The source of Tritium within the IHSS 194 steam condensate is unknown. However, the activity of Tritium within the IHSS steam condensate (i.e., 1000 pico-curies per liter [pCi/l]) is significantly lower than the EPA set public drinking water standard of 20,000 pCi/l.

Comment 7 (Page 12, lines 22 through 24):

Is the Tritium within the steam condensate naturally occurring in all the steam that's at Rocky Flats?

Response 7:

This comment does not pertain to the OU 16 Proposed Plan. However, the source of Tritium within IHSS steam condensate is unknown as previously stated.

Ken Korkia Comments Continued:

Comment 8 (Page 13, lines 6 & 7):

Why are other areas where there were steam condensate leaks not being considered for Tritium contamination?

Response 8:

This comment does not pertain to the OU 16 Proposed Plan.

Comment 9 (Page 15, lines 17 through 20):

If a steam leak were to occur today, would it be standard procedure to do a radionuclide specific testing on that to see if there was Tritium, plutonium, uranium in the steam?

Response 9:

This comment does not pertain to the OU 16 Proposed Plan. Information regarding Standard Operating Procedures for Rocky Flats Plant response to releases to the environment be obtained from _____.

Comment 10 (Page 15, lines 22 through 24):

I hope that all the documents will be as easy to read and to comprehend as the Proposed Plan, and that the decisions will be as easy to make.

Response 10:

Comment 10 requires no response.

Ronald Harlan's Comments Continued:

Comment 11 (consolidated from Page 16, lines 18 through 22):

I question whether a 1,000 pCi/l of Tritium is a natural background, 500 pCi/l is the correct value I believe in ground water.

Response 11:

The natural background activity of Tritium within steam condensate is not known. However; the released Tritium has undergone one half-life decay since the occurrence of the release, from which a present-day maximum Tritium activity of 500 pCi/l can be predicted.

Ronald Harlan's Comments Continued:

Comment 12 (Page 17, lines 3 & 4):

I kind of wonder how the Tritium got to that high a concentration within IHSS 194 steam condensate.

Comment 12:

The source of Tritium within the IHSS 194 steam condensate is not known. The activity of Tritium within the IHSS 194 steam condensate (i.e., 1000 pCi/l) is significantly lower than the EPA set drinking water standard of 20,000 pCi/l.