

memorandum

DATE January 27 1993
REPLY TO
ATTN OF EM 453 (J Ciocco 3 7459)
SUBJECT Review Comments for Draft Final Phase III RFI/RI Report Rocky Flats Plant
881 Hillside (Operable Unit No 1) October 1992
TO Rich Schassburger Rocky Flats Office

The Office of Southwestern Area Programs Rocky Flats/Albuquerque Production Division (EM 453) has reviewed the subject document and is providing the attached comments. Please address these comments before the document is finalized.

Generally we have major concerns regarding the use of different approaches to define background conditions for inorganics and radionuclides and different methods to compare metals and radionuclides concentrations to these background levels. There appear to be inconsistencies in approach and methodology between the main body of the RFI/RI Report the Public Health Evaluation and the Environmental Evaluation. In addition the actual methods used appear to be flawed. These problems lead to different conclusions about which inorganics and radionuclides occur above background levels.

We also have concerns regarding the report's insufficient discussion pertaining to the quality control data obtained during these investigations. We recommend that a separate section of the report be devoted to the interpretation and discussion of these data in order to support such conclusions as organic contamination being the result of laboratory contamination.

Call me at (301) 903 8191 or Jeff Ciocco if you have any questions related to these comments.



Autar Rampertaap
Chief
Rocky Flats Branch
Rocky Flats/Albuquerque Production Division
Office of Southwest Programs
Environmental Restoration

Attachment

cc w/o attachment
R Greenberg EM 453

cc w/ attachment
S Grace RF
B Thatcher RF