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MEMORANDUM

DATE: JAN 30, 1996

FROM: JIM BURD/SAIC *JMB*

TO: DAVE GEORGE/OES

SUBJECT: OUS DRAFT FINAL RFI/RI REPORT, COMMENT RESOLUTION.

You asked SAIC to review the responses to comments for the subject document. We reviewed the responses that you submitted to us and have the following observations:

- The responses were generally adequate.
- Comment 17 asks for more detail explaining why the stage numbering in the RFI/RI differs from the proposed stage numbering in the Work Plan. The 2nd paragraph in section 2.2 of the RFI/RI says, "The stage numbering presented in the following sections may not match stage numbers assigned in the Work Plan for particular IHSSs..." The comment response says that the chronological order of steps presented in the report match the chronological order presented in the Work Plan. Are stages and steps the same thing? Does the comment intend to say that the statement made in the 2nd paragraph is not accurate because the stage numbering does in all cases match for each IHSS in the Work Plan and the RFI/RI? If the stage numbering did not vary in the 2 documents, the statement in Section 2.2 should be deleted. If the stages did vary in some cases, the response to comments is inaccurate.
- Comment 31 recommended that the report qualitatively address the impacts and implications of the large mid-June 1995 storm event relative to the capacities of the A and B series ponds. Preparation of the report was well under way when this storm event occurred, consequently that event could not be addressed quantitatively. The first 3 sentences of the response to comments should be added to the text of the RFI/RI. These sentences address the hydraulic conditions of the soil and ponds prior to the storm and the effects of the storm when those conditions exist.

In addition the response to this comment indicated that no unique conclusions could be made because not enough information about the level of contamination in the surface water resulting from the storm were available. What is known is that all of the storm water runoff was contained in Great Western Reservoir and the sediment carried by the storm runoff will ultimately be deposited there. The response stated that, "There is little reason to believe that this storm transported contamination within OUG that is high enough to cause elevated levels of contamination to be transported offsite." No basis for this statement was provided. Concentrations of contamination in runoff may be low based on soil concentrations in OUG but the impacts of the concentrating effect of Great Western Reservoir of runoff derived sediment may be significant. The concentrating effect is evident from the OUG investigation. That investigation determined that the deep sediment in Great Western Reservoir did in fact contain about 4 pCi/g plutonium at a depth of about 18 inches (resulting from a mid 1970s contamination event). The text should discuss the possibility of off-site movement based on this study and the 1995 runoff event.

- Comment 53 addressed the impacts on species relative to the life stages spent on site. The response indicated that for purposes of the risk screen all receptors were assumed to spend 100 percent of their time on site. The response did not indicate if this clarification would be included in the text of the report. Please revise the text with this clarification.



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