

R. R. Sarter
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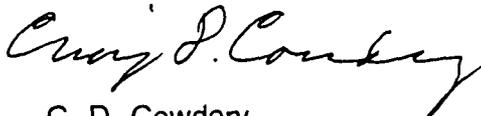
for WSRIC training is January 1994. Setting up a separate class for personnel associated with Environmental Restoration Program Division is an option that is being pursued.

The asbestos problem revolves around DOE/RFFO verbal comments on FO. 28, the procedure for tank and pipeline inspection. The problem is that asbestos could be encountered on some segments of pipelines and any personnel removing the asbestos will require the proper training and necessary certification. Work is in progress on the procedure that should address these concerns and still allow the procedure to be implementable.

As a separate issue, one of the activities proposed in the OU 9 Technical Memorandum No. 1, Volume 2 - Outside Pipelines was the use of additional geoprobe samples as part of a more aggressive sampling approach in order to provide data for a "No Further Action" classification on sections of the pipelines. Based on DOE/RFFO comments, geoprobe samples that were not in the scope of the RFI/RI Work Plan were removed. It is true that these samples would have expanded the original scope of Stage I investigation. Also, no work was performed to determine what spacing of these samples would support "No Further Action" or could be used in lieu of samples required for later stages of the investigation. EG&G Rocky Flats is concerned that, historically, the regulatory agencies have viewed the RFI/RI Work Plans as the minimum amount of sampling and investigation required to meet Phase I RFI/RI requirements. Many of these investigations have been delayed because of extra sampling that required additional stages of field effort. Although samples, every 200 feet, might meet the minimum requirements of the RFI/RI Work Plan, it is unlikely that the regulatory agencies will find this spacing acceptable for "No Further Action." EG&G Rocky Flats strongly suggests pursuing this approach even though it is not currently in the technical memorandum. At a minimum, EG&G Rocky Flats would determine how much data will be required to support a "No Further Action." If it can be demonstrated that, regardless of what is required by the RFI/RI Work Plan, additional sampling will either be required for other stages of the remediation or that additional sampling will save taxpayer money, that sampling should be pursued now rather than later.

A final concern is that the investigation of "active" pipelines is not currently included in OU 9 Technical Memorandum No. 1, Volume 2 - Outside Pipelines. EG&G Rocky Flats would like to propose a limited investigation of these lines that would not involve test pits. This methodology would utilize either hand augers or geoprobe samples in such a way as to maintain the integrity of the pipe. If this effort was started now, it could avoid the delays that occurred on the OU 9 Field Sampling Plan for the Outside Tanks.

If you have any questions regarding this correspondence, please call me on extension 6953 or digital page 5466, or B. D. Peterman at extension 8659 or digital page 5472.



C. D. Cowdery
Project Manager - OU 9
Industrial Area OU Closures/Decontamination & Decommissioning Team

Orig. and 1 cc - R. R. Sarter

CDC:alk

cc:

J. R. Burd - Scientific Applications International Corporation
J. M. Roberson - DOE/RFFO
S. W. Slaten - " "