

Comments on Draft Final Phase I RFI/RI Work Plan
for OU15 Inside Building Closures

Page ix-List of Acronyms--The HSL appears twice in this list.

Page 2-2, Sec. 2.1--A more accurate description of the interim status closure for these events might be: "Closure Plans for seven interim status closures were submitted to CDH in 1986. Five years later, after six of these closures were incorporated into the final IAG as OU15 in January, 1991, the 1986 closure plans were outdated."

Page 2-8, Sec. 2.2.4--According to personnel in building 447, the uranium chip roaster has been dismantled, steam cleaned, swipe tested and put back into service burning nonhazardous uranium chips. Apparently, the swipe test results have been lost. Swipe tests on and inside the chip roaster and the room should confirm this and justify RCRA interim status clean closure on the unit.

Figure 2-1--Remove the operable unit boundary line from the map, and the solid operable unit boundary and line definition in the legend.

Page 4-10, Sec. 4.2.4, last sentence--The sentence should read "If contaminant concentration in the steam..."

Part 7--Please clarify that samples will be taken on the inside surfaces of the cyanide hood and the uranium chip roaster. Also, clarification is needed when presenting areas to be swipe tested (including analytical methods for swipe samples) and areas to be rinsate sampled. The use of the term "steam sampling" may help clarify that steam cleaning is not a response to swipe sample analysis results, but a method of sampling for separate analytes. This point must be made clear in the final document.

Page 7-11, first sentence--The sentence should read "If contaminant concentration in the steam..."

Page 7-23, Sec. 7.6, second paragraph--Please clarify the number of duplicate samples to be taken.

Part 10--Table 10-1 and Figure 10-1 are unreadable.