

INTEROFFICE CORRESPONDENCE

DATE March 2, 1992

TO M J Harris, Chemical Technology, Bldg T771J, X5914

FROM W A Moore, Ecology & National Environmental Policy Act Division, Bldg 051, 273-6217

SUBJECT NEPA DOCUMENTATION REQUIREMENTS FOR N R T PROJECT - WAM-0080-92

I am in receipt of your memo of February 18, 1992, concerning the appropriate level of NEPA documentation for the N R T project. As I understand the project, up to 100 pounds of plutonium-contaminated soil are to be obtained at RFP and sent to the laboratory of Nuclear Remediation Technology, Inc (NRT) in San Diego, CA. The soil will be obtained either by collecting it from the ground in the vicinity of OU 2 or by collecting it from 55-gallon barrels of potentially-contaminated soil that have already been removed from the ground as part of the OU 2 site characterization program. These drums of soil are presently in OU 2 awaiting characterization. NRT wishes to use the soil to test the efficacy of its processes in removing plutonium from soils. The involvement of DOE is limited to collecting and shipping the soil.

As noted in your memo, this project is very similar to the Integrated Demonstrated (ID) Project (EC 4391) under which RFO collected and shipped plutonium-contaminated soil samples to the Nevada Test Site for similar testing with different processes. The role of RFO in the NRT project appears to be exactly the same as its role in the (ID) project: collecting and shipping plutonium-contaminated soil for off-site testing. RFO's activities in the ID project were categorically excluded from further NEPA documentation requirements under the "site characterization" exclusion (RFO/CX 0007-90 Rev). Therefore, I expect that collecting and shipping plutonium-contaminated soil under the NRT project will also be categorically-excludable under the same exclusion. There is some uncertainty about this because use of the site characterization exclusion for the ID project created some dissent within DOE, HQ. However, if consistency means anything, the ID project is a perfect precedent for the work you propose in this NRT project.

Before preparing the environmental checklist for this project, the following points should be clarified:

1. The method of soil collection should be settled and described in detail.
 - a. If soil is to be taken from barrels, how will the barrel contents be characterized to determine if they are appropriate for the tests? Appropriate assurances about worker and public health protection from resuspension should be included in this description.
 - b. If soil is to be collected from the ground, describe the method (shovel?, backhoe?) and how worker and public health will be protected from the possibility of resuspension.
2. Disposition of soil samples and any other material or equipment that may become contaminated during the tests should be described. Will they be returned to RFP? Disposed of by NRT? Particular attention should be paid to fate of any media that might retain the collected plutonium.