

April 26, 2001

Mr. Timothy J. Bauer  
Assistant Project Leader  
Environmental Survey and  
Site Assessment Program  
Oak Ridge Institute for Science  
and Education  
P.O. Box 117  
Oak Ridge, TN 37831-0117

SUBJECT: COMMENTS ON DRAFT REPORT - CONFIRMATORY SURVEY OF THE  
EXCAVATED DRAIN SYSTEM OF THE SOUTHEAST WING OF BUILDING 3A,  
LAKE CITY ARMY AMMUNITION PLANT (RFTA NO. 01-001)

Dear Mr. Bauer:

I am responding to your letter dated April 12, 2001, which provided a draft copy of the subject report for our review and comment. We have reviewed the draft report and have the following comments:

1. p.3 - Reference System - The report should state whether the drawing was generated by ORISE or was supplied by LCAAP.
2. p.3 - Subsurface Soil Sampling and Borehole Logging - Given that the introduction says that drain pipes were removed and the trenches were partially backfilled, it is difficult to grasp as to how ORISE's staff could identify sampling points at "suspected pipe joints" locations. It is suggested that the sentence be edited or clarified.
3. p.3 - Sediment Sampling - As with the discussion supporting the subsurface soil sampling scheme, the text describing the sampling of sediments should state that two sediment samples were collected.
4. p.3 - Sample Analysis and Data Interpretation - This section should clearly state that only two samples were selected for alpha spec analysis. The last sentence of the section should note that all reported concentrations are expressed as "pCi/g dry."
5. p.4 - Surface Scan and Borehole Logging - It is not clear from the text whether the boreholes were actually logged by lowering a radiation detector into each hole. If so, provide a table with data for each borehole. If not, change the title of that section.

The presentation of surface scan measurements characterizing radioactivity in soil samples and excavation walls needs to be supported by a table, especially since one measurement implies the presence of more radioactivity. It is suggested that a new table be

added, presenting the range of results by specific locations or elevations within trenches. For the results presented here, the data need to refer to trench elevations at which the elevated measurements were noted and compare them to the results of soil concentrations given in Table 1 of the report.

6. p.4 - Radionuclide Concentrations in Soils - A review of the results discussed in the text and Table 1 indicates that alpha spectroscopy results are not included. It is recommended that a new table be included, presenting isotopic U results for the two samples analyzed by this method.
7. p.5 - Comparison of Results with Guidelines - Given the conclusions reached in this section and in the Summary section (see 2nd sentence of 2nd para., p.5), it is recommended that a sentence be added after the last sentence of this section (Comparison of Results with Guidelines). For example, the sentence might note: Moreover, the results of surface scan measurements indicate that additional radioactive contamination may be present in trench soils along the line of the prior floor drains.

Should you have any questions, please do not hesitate to contact either Jean-Claude Dehmel at (301) 415-6619 or me at (301) 415-6605.

Sincerely,

**/RA/**

Stewart W. Brown, Project Manager  
Decommissioning Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

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