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Post Docket = 70-3085

From: Amir Kouhestani
To: Bill Lenart; David Frothingham (E-mail)
Date: 5/26/05 4:14PM
Subject: **ACTION:** USACE Draft-Final Remedial Investigation Report (March 2005)

-5/26/05
William Lenart and David Frothingham:

In response to your 25 March 05 request, Subject as Above, and the provisions of the Memorandum of Understanding Between the U.S. Nuclear Regulatory Commission [NRC] and the U. S. Army Corps of Engineers [USACE] for Coordination of Cleanup & Decommissioning of the Formerly Utilized Site Remedial Action Program (FUSRAP) Sites With NRC-Licensed Facilities, I submit the following NRC staff comments for the USACE's consideration. NRC staff comments about the review of the groundwater portion of the draft-final Remedial Investigation Report will be submitted to USACE for consideration, in a separate email. This note will be posted against NRC Docket # 70-3085.

If you have any questions about our comments or need additional information please feel free to contact me at 301/415-0023.

vr,
Amir Kouhestani
NRC SLDA Project Manager
Division of Waste Management & Environmental Protection

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NRC Staff Comments on USACE Draft-Final Remedial Investigation Report, March 2005

1. Section 6.3.4.1, page 6-28. Justify excluding Dry Run from existing exposure units, and tentatively designating Dry Run as a MARSSIM Class 3 survey area under MARSSIM. Dry Run sediment is known to contain elevated enriched uranium concentrations. Seeps in upper trench area contain enriched U up to 21 pCi/L (sample SP-DR-01, June 2004); and Dry Run sediment concentrations of uranium-234 are higher than derived Exposure Point Concentrations (EPCs) for any single exposure unit. For example, Dry Run sediment sample WS/SE-DR-04 contains 29 pCi/g uranium-234 compared to exposure unit 1 EPC value of 7.4 pCi/g.

2. Section 6.3.4.2, page 6-32 and Section 6.6.2, page 6-56. Justify the use of a 4 meter thick contaminated zone in future use scenarios. USACE modeled the depth of the contaminated zone as from the surface to a depth approximately equal to the bottom of the trenches (4 meters). The residual contamination outside the burial trenches appears to be constrained to a depth of 6 inches. As a result, the derived EPCs for future use scenarios (Table 2) are smaller than actual near-surface contamination concentrations used in current use scenarios. For example, the USACE-derived EPC value for plutonium-239 under the current site use scenarios is 80 times higher than that for future use values.

3. Section 6.3.3, pages 6-24 through 6-28. Clarify whether Dry Run sediment contamination is excluded from all three exposure units, and thereby excluded from the exposure unit-specific dose assessments for the four exposure scenarios. Starting at page 6-26, the specific descriptions of the pathways considered for the adolescent trespasser, construction worker and subsistence farmer all include exposure to dry sediment. However, the exposure unit designation on Figure 6-1 excludes most of Dry Run.

4. Section 6.3.3, page 6-28. After first set of bullets, the text incorrectly states that the groundwater pathway is not considered for the subsistence farmer.

5. Sections 6.3.3.3 & 6.3.3.4, pp. 6-26 to 6-28. For the future use scenarios (subsistence farmer and construction worker), justify the use of 3,350 square meters for the area of the contaminated zone. This is less than the area of the upper trenches, and it is less than 2% of the total area of the SLDA.

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CC: Barrett, Jim R.; Maiers, Bob (PADEP); Shearer, Dwight

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