

From: Amir Kouhestani
To: William J LRP Lenart
Date: 7/18/05 12:17PM
Subject: Re: Responses to comments on SLDA [USACE's 3/25/2005 SLDA Draft Final RI Report]

-7/18/05

Bill:

Staff has completed backcheck review of USACE's July 12, 2005 responses to our May 26, 2005 review comments about USACE's Draft final Remedial Investigation Report dated March 25, 2005.

1) Staff has no further comments with respect to the USACE's responses to our May 26 comments about the SLDA dose assessment.

2) With respect to USACE's responses to our comments on groundwater we offer the following:

a) The USACE's responses to NRC's comments on the vertical movement of groundwater between the different water bearing units is significantly more definitive than the presentation made in the current draft final RI report. Staff do not disagree with the USACE's response. The discussion in your responses has provided additional information on the lack of vertical movement of organic chemicals, DNAPLs, from the overburden to the lower water bearing units. Staff notes USACE have used DNAPLs, which are geochemical tracers, to support USACE's position that vertical groundwater movement between the water bearing units is extremely low. The USACE should consider inclusion of the supplemental information in the final RI report to more clearly state the limitations of vertical movement of the groundwater and potentially radionuclides dissolved in the groundwater from the overburden to the lower water bearing units. USACE should also consider to revise the conceptual site model to reflect your current much stronger position on vertical groundwater flow.

b) The USACE's DNAPLs evaluation was based upon quarterly 1998 through 2000 licensee groundwater data. Staff recommends USACE reviewing all the licensee's groundwater data from 2000 through the present. It is critical that the USACE report that the earlier results are still valid with this more recent monitoring data.

Please call me if you have any questions.

vr,
Amir Kouhestani
NRC SLDA Project Manager

>>> "Lenart, William J LRP" <William.J.Lenart@lrp02.usace.army.mil> 07/12/05 9:03 AM >>>

Amir, I thought I had sent this to you but when I went back and checked the email address I had for you I had a typo and didn't realize it. Attached are the responses to the comments your agency provided on the RI for the SLDA project in Parks Township, Armstrong County, PA. Please review the responses and if you have any questions or comments notify myself or David Frothingham.

Bill Lenart
Project Manager SLDA

CC: Barrett, Jim R.; David G LRB Frothingham; Harper, Sam (PADEP); Maiers, Bob (PADEP); Shearer, Dwight

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Creation Date: 7/18/05 12:17PM
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Priority: Standard
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