

**Responses to NRC Comments
Bush River Study Area
Final Status Survey Plan, Radioactive Waste Management Facility**

Comments		Responses
1	In section 2.1, please list the county which the site is located. Please include description of current land uses in and around the site along with a summary of anticipated land uses.	Agreed. We will add the county name in this section.
2	In section 3.1, you state that the Adamsite Vaults final report provides reasonable documentation that radioactive contamination was minimal in that area. Please submit that report.	Agreed. This report will be provided to the NRC.
3	Table 4-2, Characterization Sample and Measurement Data needs units to be placed in the table.	Agreed. The table will be revised to show units of measure.
4	Section 4.2.6 discusses the abandoned 22 nd Street Landfill Sump. Survey results need to be included in the document or referenced.	The data will be provided in the FSSP, or the landfill sump will be resurveyed during the FSS.
5	Section 4.3.2 references Table 4-3 which should be Table 4-5.	Agreed.
6	Section 5.1.2 does not discuss the positive strontium 90, carbon 14, or technicium 99 in the samples listed on Tables 5-1 or 5-2. Why were these contaminants not of a concern?	A discussion of why Cs-137 and Co-60 were identified as the only COCs is presented in section 4.3 of the final HHRRA, dated June 2004. This document will be forwarded to you. The methodology of selecting the COCs will be summarized and added to a revised section 5.1.2 of the FSSP.
7	Table 5-1 has two separate groupings of data. Please discuss the difference between the groupings and their significance.	This is an error that will be corrected in the FSSP. The second grouping of data will have headings added to the columns.
8	The Data Quality Objectives, Table 5-5, gives the specifics for the soil areas but does have the objectives for the building surfaces portion of the release.	Agreed. Data quality objectives for building surfaces will be added to the FSSP.
9	Section 5.5 states that WESTON maintains a Corporate Quality Assurance Program. The following attributes are contained in the Appendix D, Decommissioning Plan Checklist, NUREG-1757 Volume 1, Rev 2, 'Consolidated NMSS Decommissioning Guidance, Decommissioning Process for Materials Licensees'. Since a decommissioning plan was not required many of the attributes a decommissioning plan need addressed in the Final Status Survey Plan. Please submit the program or provide the following attributes:	The Corporate Quality Assurance Program referenced in Section 5.5 is an umbrella document that covers Weston's diverse set of clients and their QA/QC requirements and allows for development of operation-, client-, or project-specific QA programs. For the Bush River Study Area final status survey, we will implement Weston's Quality Assurance Program for U.S. Department of Energy Projects (DOE QAP) as it provides the QA required for this project. The DOE QAP is based on the current DOE Order 414.1C and is being provided with these responses. The Weston DOE QAP and related work instructions (WIs) are primarily implemented for DOE clients, but were developed for use by other Nuclear Programs Operations staff as well. This manual will be forwarded for your review.
9a	A description of the QA program management organization.	The Weston QA program management organization is described in Section 1.2 of the DOE QAP that will be submitted to the NRC.
9b	A description of how work performance is evaluated.	Management Assessments and Independent Assessments are performed as described in

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		Sections 9 and 10 of the DOE QAP and in DOE/ABQ-WI-006, <i>Assessments</i> .
9c	An organization chart of the QA program organization	An organization chart of the Weston QA program organization is provided as Figure 1-1 of the DOE QAP that will be provided.
9d	A commitment that activities affecting the quality of final site survey will be subject to the applicable controls of the QA program and activities covered by the QA program are identified on program defining documents.	Requirements for work processes, including establishment of applicable procedures, plans, and controls are established in Section 5 of the DOE QAP. The PM and site manager are directly responsible for ensuring compliance with applicable controls. Project QA officers work with the PM to ensure QA program requirements are met. A commitment statement will be added to the FSSP.
9e	A brief summary of the company's corporate QA policies.	The Corporate Quality Management System and policy, and integration with the DOE QAP are described in Section 1.1 of the DOE QAP.
9f	A description of the management reviews, including the documentation of concurrence in these quality-affecting procedures.	Management Assessments and Independent Assessments are described in Sections 9 and 10 of the DOE QAP and in DOE/ABQ-WI-006, <i>Assessments</i> .
9g	A description of the quality-affecting procedural controls of the principal contractors.	Sections 4, 5, and 7 of the DOE QAP define requirements for quality-affecting procedural controls and subcontractor requirements.
9h	A description of how NRC will be notified of changes (a) for review and acceptance of the QA program as presented or referenced in the final survey plan before implementation and (b) in organizational elements within 30 days after the announcement of the changes.	Any revisions to the DOE QAP are submitted to affected clients. DOE/ABQ-WI-004 describes document and revision control.
9i	A description of how management regularly assesses the scope, status, adequacy, and compliance of the QA program.	Weston management regularly assesses the QA program as described in the DOE QAP Introduction, Sections 1.1, 1.2, and 3.
9j	A description of the instruction provided to personnel responsible for performing activities affecting quality.	The DOE QAP, Section 2 and DOE/ABQ-WI-002 provide training and qualification requirements.
9k	A description of the training and qualifications of personnel verifying activities.	The PM is responsible for ensuring project-specific training and qualification requirements are met in accordance with Section 2 of the DOE QAP and DOE/ABQ-WI-002.
9l	A description of the self-assessment program to confirm that activities affecting quality comply with the QA program.	Assessments are performed in accordance with Sections 9 and 10 of the DOE QAP and DOE/ABQ-WI-006.
9m	A commitment that persons performing self-assessment activities are not to have direct responsibilities in the area they are assessing.	Sections 9 and 10 of the DOE QAP and DOE/ABQ-WI-006 require independence of personnel conducting assessments.
9n	A description of the organizational responsibilities for ensuring that activities affecting quality are (a) prescribed by documented instructions, procedures, and drawings and (b) accomplished through implementation of these documents.	Project managers, site managers, and project QA representatives are responsible for ensuring that procedures are adequate and that project personnel follow prescribed procedures, instructions, and/or drawings. Project personnel are responsible for following prescribed procedures. The DOE QAP defines these requirements in Sections 1.2 and 5.
9o	A description of the procedures to ensure that	Section 5 of the DOE QAP requires that work be

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	instructions, procedures, and drawings include quantitative acceptance criteria and qualitative acceptance criteria for determining that important activities have been satisfactorily performed.	conducted in accordance with prescribed procedures that include acceptance criteria and technical standards applicable to the work and final product. DOE/ABQ-WI-004 requires technical review of procedures developed by Weston staff, and DOE/ABQ-WI-005 provides item and equipment control requirements.
9p	A summary of the types of QA documents that is included in the program.	The DOE QAP references applicable WIs, such as: <i>Records Management</i> (DOE/ABQ-WI-001); <i>Project Training Record</i> (DOE/ABQ-WI-002); <i>Quality Improvement</i> (DOE/ABQ-WI-003); <i>Document Preparation, Review, and Control</i> (DOE/ABQ-WI-004); <i>Item and Equipment Control</i> (DOE/ABQ-WI-005); <i>Assessments</i> (DOE/ABQ-WI-006). As applicable, Weston Operating Practices, Weston Radiation Operating Procedures (WROPs) and any project-specific procedures will be implemented under this program.
9q	A description of how the licensee develops, issues, revises, and retires QA documents.	Section 4 and DOE/ABQ-WI-001 and -004 describe development, review and approval, distribution, revision, and archival of project documents and records.
The following items did not seem to be addressed:		
10	A map or drawing of the buildings classified by residual radioactivity levels, divided into survey units with an explanation of the basis for division into survey units.	Figures of buildings E2354 and E2371 will be added to section 5.5.3 of the FSSP to depict the survey units within these buildings. Text will be added to this section to explain the basis for the survey units.
11	A description of calibration and operational checks of all instrumentation. In particular, what will be the acceptance criteria of the daily source checks?	Section 4.2.2 of the FSSP will be revised to specify that instrument calibration will be traceable to NTIS and performed only by licensed calibration contractors. The acceptance criteria for daily source checks will be +/- 10%.
12	A description of how the samples to be analyzed in the laboratory will be collected, controlled, and handled.	Section 5.5.2.6 of the FSSP will be revised to describe how samples collected in the field will be collected, controlled, and handled.
13	A description of the clean fill placed over the soil areas and how that will affect surveys performed now.	Section 5.5.2.4 of the FSSP will be revised to include the use of supplemental samples currently in secured storage in building E2371 that were collected from within a 5 foot radius of the MARSSIM specified sampling locations. If neither a removal action verification sample, nor a supplemental sample is within 5 feet of the MARSSIM specified location, another sample will be collected. If clean fill has been placed over the soil at this location, it will be carefully removed until the original post RA grade is visually observed, at which depth the new sample will be collected.
14	A description of how you will determine the random start point of the survey unit.	Section 5.5.2.4 describes the random start point for each soil survey unit. Section 5.5.3 will be revised to describe the random start point for building surface survey units.

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15	A description of the radiation safety training that the licensee will provide to each employee.	The FSS will be performed by a CHP and RCT, and at least one will have prior experience with the removal action at the Rad Yard. Prior to commencing field work, a hazard analysis will be performed to familiarize the field team with the expected and potential radiological hazards at the site. Both team members will have current HAZWOPER certification. The text will be revised accordingly.
16	A description of any daily worker “jobsite” or “tailgate” training that will be provided at the beginning of each workday or job task to familiarize workers with job-specific procedures or safety requirements.	The text will be revised to indicate that before commencing work each morning, the CHP and RCT will discuss the plan of the day and associated radiological and industrial safety concerns.
17	A description of the documentation that will be maintained to demonstrate that training commitments are being met.	The text will be revised to indicate that the hazard analysis and a log of the daily “tailgate” discussions will be retained in project files.