HLWYM HEmails

From: Brittain Hill
Sent: Wednesday, May 31, 2006 8:09 AM
To: 'A Sun'
Subject: Re: minor comments about Groundwater protection ISG

Hola Alex - Hope your son is feeling better. It's tough on the parents when the kids are sick.

Thanks for the comments - some brief replies below. Please give me a call if we need to discuss these or other things further.

Thanks-
Britt

>>> "A Sun" [redacted] 05/30/06 4:08 PM >>>
Hi, Britt,

Sorry about this late reply. I went to a conference for the most time last week and then my son got sick.

I have gone through your revised draft and I only have minor comments:
(1) The term "compliance point" was used multiple times in the text.
However, it is not well defined. On page 7, "...verify that the wells are located at the compliance point..." may cause some confusion to the reader. How can multiple wells be located at the same point?
** Compliance point is direct from EPA (e.g., 66 FR 32114). I agree that this could be ambiguous, and will take a look at rewording this to something along the lines of "in the accessible environment above the highest concentration in the plume of contamination," which is the alternative regulatory language.

(2) The description on well screened interval is a little ambiguous.
On page 2, it is said the screened interval "need to be supported by data from existing water supply wells in the Town of Amargosa Valley", whereas on page 9, it says the screened level need to "include the highest concentration of radionuclides in the plume ..." Is it possible that the existing wells in Amargosa Valley do not support the latter characteristics?
** not sure what the concern is. The calculated interval must include the highest concentration in the plume. The screening should be representative of current wells (i.e., diameter, permeability, cementing/casing etc.) but in no way restricts the location or position of the screened interval for the plume calculation. Please suggest alternative wording to text if you think this is ambiguous.

(3) The potential "plume" reflects DOE's mass transport model prediction. Do staff need to worry about transport model uncertainty at all when review groundwater protection?
** Since the transport model will be evaluated as part of the PA for individual protection, and this PA is the basis for groundwater protection, then there is no need for a duplicative review. Groundwater needs to focus on the representative volume calculation, and verify that the PA appropriately calculates concentrations in the RV.

I hope my comments help.

Best regards,

Alex

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