

Responses to NYSERDA's April 20, 2011 Comments on the *Phase I Characterization Sampling and Analysis Plan West Valley Demonstration Project, Rev. 1*

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1	1	General Comment	The West Valley Demonstration Project (WVDP) Phase 1 Characterization Sampling and Analysis Plan (CSAP) identifies that subsurface soil contamination exists in a number of Waste Management Areas (WMAs), but that the extent of this contamination is unknown. At some point, the other sources of subsurface contamination (buried contamination and contaminated groundwater) need to be evaluated to ensure that those areas are identified and characterized.	Comment acknowledged. The primary goal of the Phase 1 CSAP is to satisfy Phase 1 Decommissioning decision-making needs. The CSAP is not currently designed to answer all contaminant nature and extent questions that may exist for the site, particularly for those that are primarily related to Phase 2 decision-making.. The assumption is that additional data collection may be required beyond what is currently identified by the CSAP to support Phase 2 decision-making.
2	General Comment	General Comment	<p>The predominant focus of the WVDP Phase 1 CSAP is to obtain samples from each WMA, which will provide additional information for all areas. This process does not necessarily ensure that all areas will be adequately characterized for decommissioning purposes. NYSERDA believes that additional sampling will eventually need to be done to ensure that all areas have been adequately characterized for the purposes of making Phase 2 decisions or in preparation for the Phase 2 Final Status Survey Plan (FSSP). WMA 5, for example, is known to have subsurface contamination, but the only subsurface sampling required is the area surrounding buried infrastructure. Contingent sampling is possible, but only if contamination has been detected in the surface soils.</p> <p>NYSERDA believes that a second CSAP and FSSP will be needed to support the Phase 2 decisions for the remaining WMAs.</p>	See response to Comment #1.
3	General Comment	General Comment	The WVDP Phase 1 CSAP identifies that additional documents (e.g., the Phase 1 Decommissioning Plan	DOE will provide NYSERDA copies of the additional supporting documents.

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			Waste Management Plan, the Quality Assurance Project Plan, etc.) are planned. It is anticipated that these documents will provide additional detail about the Phase 1 areas (i.e., soil segregation and waste disposal pathways). NYSERDA requests an opportunity to review and comment on these supplemental documents.	
4	General Comment	General Comment	The use of the Gamma Walkover Survey (GWS) in areas where saturated soils exist may be problematic and could lead to a large measurement error. NYSERDA recommends a field walkover inspection clearly delineating the wetlands or ponded areas, or areas where soil saturation is possible. If, after a field walk-over inspection, areas are identified as having the potential for higher levels of saturated soils, then NYSERDA recommends the completion of additional systematic surface and subsurface sampling.	The CSAP recognizes the GWS data collection would not be appropriate in areas where standing water or saturated soil conditions exist. Section 6.5 states that in areas with standing water or saturated soil conditions systematic sampling will be used with a density of one sample per 200 m ² . This density is less than required for Final Status Survey (FSS) Class 1 areas, but greater than what is required for FSS Class 2 areas. If CSAP sampling in these areas identifies contamination above CG levels, then either remediation will take place, or additional sampling will take place to better define the extent of contamination. Section 6.5 calls for sampling the 0-15 cm soil layer initially. If any of these sample results indicate contamination above background conditions, the 15-100 cm interval would be sampled. If those samples indicated contamination above background conditions, sampling would continue in one meter intervals vertically until contamination was bounded.
5	General Comment	General Comment	The GWS is not the most optimum tool for selecting subsurface sample locations "to maximize the possibility that contamination will be encountered," as subsurface soils and infrastructure may have been backfilled with clean fill. The process of subsurface sampling along buried infrastructure is best performed systematically.	The CSAP does not propose to use GWS data collection as the means for identifying areas where subsurface contamination is a potential concern. DOE is also not proposing to systematically sample the subsurface across the entire WVDP premises. DOE is committed to exploring the possibility of subsurface contamination in those areas where Phase 1 Decommissioning decisions may be made and there is a reason to believe that subsurface contamination may be present. Example areas identified in the CSAP include buried infrastructure , areas where there is evidence of historical fill activities (e.g., in WMA 5 and WMA 2), areas where it is known that contamination was buried (e.g., WMA 5 and WMA 6), and areas where historical data collection suggest buried contamination might be present

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				(e.g., the western edge of WMA 12, etc.). If NYSERDA is aware of other areas where potential contamination may be present, these should be identified and demarcated so that they can be properly addressed as CSAP Technical Task Orders are prepared for those areas. In the case of buried infrastructure, the CSAP calls for systematically trenching buried infrastructure of potential concern to determine whether contamination is present.
6	General Comment	General Comment	The CSAP repeatedly refers to "area[s] where standing water or saturated soil conditions prevent GWS data collection." How these "areas" are defined is unknown. To the reader, it appears that the CSAP assumes these areas to be relatively small, discrete areas, as a maximum of five surface samples is called for. In reality, these areas may be very large, contiguous areas (e.g., the Erdman Brook valley). In such cases, a much larger number of samples would be more indicative of the areas sampled. It is recommended that the text "and at most five" be removed from each discussion of the Surface Soil Sampling in Wetlands. The sampling density of 200m ² should reference the number of samples in a saturated "area."	The CSAP expects that standing water/saturated areas will be identified and delineated as part of GWS work. Note that for portions of the site, inaccessibility for GWS surveys because of saturated soil conditions is a seasonal concern; consequently, GWSs will be conducted when access is anticipated to be best (e.g., late summer). The CSAP does not anticipate small areas will be saturated – 5 samples at 200 m ² per sample is 1,000 m ² . To address NYSERDA's concern that large areas maybe under-sampled, DOE proposes to add text that at minimum one sample will be collected per 500 m ² for areas exceeding 2,500 m ² in size, which would be the equivalent of 20 samples per Class 2 area, a sample density that is higher than would be anticipated for demonstrating FSS closure if none of the samples yielded results greater than the CG requirements. Note that the largest contiguous areas that are potentially inaccessible to GWS data collection are in WMA 4 and WMA 12, areas where impacts above CG requirements are not expected.
7	4	Para. 1	Due to the variations in historical operations, it is likely that the concentrations of each of the radionuclides of interest (ROIs) vary by site location. Therefore, NYSERDA recommends that a second sample be collected immediately downstream of the EQ-1 discharge to Erdman Brook.	This comment is presumably focused on the potential use of surrogates at the site. At this stage it is not DOE's expectation that surrogates will serve a useful purpose. However, per NYSERDA's request, text will be added to the appropriate WMA appendix requiring an additional sample to be collected immediately downstream of the EQ-1 Erdman Brook discharge.
8	15	Section 3.2/ Lines 6-9	This section states that "DOE and/or its contractors will maintain an administrative record of characterization activities, including electronic and hardcopy documents, data sets, and related	DOE will provide NYSERDA access to the administrative record referenced, including permission to copy records that NYSERDA would like.

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			information such as maps, diagrams, geologic logs, field notebooks, and photographs.” NYSERDA requests the opportunity to review, and possibly obtain copies of these records.	
9	40	Para. 2	Due to the expected "bathtub ring" of contamination (as described in Section J.7, 5th paragraph) from sediments surrounding the stream channel centerline, NYSERDA recommends that systematic sampling be conducted laterally outward orthogonal to the stream centerline extending to the potential high watermark during a flood event such as the August 2009 event.	“Bathtub rings” of contamination have been encountered at other DOE sites. These are difficult to identify via systematic sampling since they typically are very spatially discrete in nature and usually have no visual indication. They are easiest to identify by a combination of GWS and biased sampling. By their nature they exist in soils that are typically not saturated and so can be scanned. DOE’s preference would be to rely on the GWS protocols as described. If there are specific locations of particular concern to NYSERDA, DOE would recommend calling these out for biased sampling as Technical Task Orders for those areas of potential concern. Alternatively if NYSERDA already knows locations that should be biased sampled, they could be incorporated as additional sampling requirements in the appropriate WMA appendices.
10	56	Section 7.1/ Para. 3/ Lines 7-8	The text states that remedial action survey identified for WMA 2 will be submitted for quick-turnaround analysis of Sr-90. Please explain the technical basis for solely analyzing for Sr-90, when Cs-137 and off-site analysis for all 18 ROIs are identified in the remedial support surveys for WMA 1?	The referenced paragraph talks about submitting samples from both WMA 1 and 2 for quick turnaround Sr-90 analysis. The purpose in both cases is to determine whether there is obvious contamination that should be immediately addressed. In neither case do the quick-turnaround analyses substitute for off-site analysis for all 18 ROIs to determine the residual activity concentrations of the dig face as part of the FSS process once excavation is believed to be complete.
11	57	Section 7.1/ Para. 1/Lines 5-6	The remedial action survey identified for the 476 foundation pilings in WMA 1 will be submitted for quick-turnaround analysis of Sr-90. Please explain the technical basis for solely analyzing for Sr-90, when Cs-137 and off-site analysis for all 18 ROIs are identified in the remedial support surveys for WMA 1?	See response to comment #10. Samples from the piles will be submitted, eventually, for analysis of all 18 ROIs as part of the FSS process. The purpose of the initial screen for Sr-90 is determine if there is unacceptable contamination prior to submitting the sample for a full suite analyses.
12	63	Section 8.3/ Para. 2/Line 8-10	This section states that “If the application for the rule described above results in an unacceptably high rate of false positive “hits” for Pu-239, the comparison process may be modified to also	DOE has not established what would be an “unacceptably high” false positive rate, and would prefer to leave this until actual CSAP data are collected and available for review. Text can be added that the process would not be modified

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			account for measurement uncertainty.” Clarify what constitutes “unacceptably high rate of false positive “hits”? Also, please explain why Pu-239 may require a different statistical approach (i.e., the 95% UTL or three-times-uncertainty rule).	without prior consultation with NYSERDA in the event that false positives are observed. Pu-239 is a potential issue because it has measureable activity concentrations in background soils, but is a measurement with significant measurement uncertainty at those levels. For most background radionuclides (e.g., U-238, Ra-226, Th-232, K-40, Cs-137, etc.) the variability observed in off-site laboratory analyses of background samples is driven by the heterogeneity present in actual background activity concentrations, not measurement error. With Pu-239, the reverse will likely be true; consequently, small changes in laboratory performance for individual samples can result significant changes in analytical error for individual Pu-239 results. This in turn can lead to the appearance of Pu-239 above the 95%UTL as calculated from a background data set when in fact the higher value simply reflected higher measurement uncertainty. Whether this becomes an issue or not for the site is difficult to say without actually having CSAP surface soil data in hand to review, particularly the estimated measurement error associated with Pu-239 results and the degree to which that error is relatively constant across samples or shows wide variability itself.
13	65	Section 9.1/ Items #1&2	It may be worthwhile to note that a comprehensive high resolution Light Detection and Ranging (LiDAR) topographic survey and orthophotography was conducted in November 2010, and will be used to support CSAP activities.	Thanks, will add text acknowledging the LiDAR.
14	67	Section 9.3/ Para. 2	To ensure that datasets are spatially rectified to a projected coordinate system and usable across computing platforms, electronic maps need to be delivered in ESRI ARC map documents, with associated layer files, in addition to being delivered in AutoCAD .dwg format.	Will add requirement that maps be delivered in both AutoCad and ESRI shape file formats, with coordinate systems consistent with the site’s State Plane requirements.
15	79	Section 11.1/Para. 1	Based on the extent of perennially saturated soils in the valleys of Erdman Brook and Frank’s Creek, an estimation of "accessible portions of the site" for GWS of 140 acres is likely an overestimation. This "accessible area" may be as small as 110acres. As	Will add a requirement to obtain soil moisture estimates as part of GWS data collection.

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			previously mentioned (see General Comment #4, to achieve the proper interpretation of the GWS data, it would be beneficial to conduct a soil moisture measurement immediately before or during the GWS at each measurement location.	
16	A-19	Sect. A.9.5/ 1st Bullet	What is the technical basis for sampling only two locations of buried infrastructure in WMA 1, when all other WMAs identify three sampling locations?	Size of the area of interest – which is just that portion of WMA 1 that will not be excavated (which does not leave much area left).
17	D-2	Section D-3/ Para. 3	The "scarring" in the 1966 aerial photograph that "potentially indicates limited disposal operations" is not within the boundary of the CDDL as drawn on all CSAP maps. To incorporate the "scarred" area, the CDDL boundary needs to be expanded.	Comment acknowledged. This does not have an impact on proposed CSAP activities in WMA 4.
18	E-11	Section E.7/ 5th Bullet	The fifth bullet states that the subsurface soils in WMA 5 may be contaminated by subsurface releases from the Process Building, and that the western and northern extent of these subsurface soil impacts is unknown. Yet, the required sampling for WMA 5 only consists of buried infrastructure soil sampling below one meter. Based on surface soil results, there are 18 contingent samples identified. It is NYSERDA's opinion that the number of subsurface soil samples may not be sufficient to adequately characterize WMA 5.	See response to Comment #1. Delineating the extent of groundwater contamination beneath WMA 5 is beyond the scope of the CSAP and is not required to support Phase 1 Decommissioning decision-making.
19	E-11	Section E.7/ 6th Bullet	The sixth bullet identified that low-levels of Sr-90 and H-3 groundwater contamination exist in the eastern half of WMA 5. The potential sources of this contamination include hardstand spills, WMA 3, buried infrastructure or other undocumented releases. Yet, the required sampling for WMA5 only consists of buried infrastructure soil sampling below one meter. Based on surface soil results, there are 18 contingent samples identified. It is NYSERDA's opinion that the number of subsurface soil samples may not be sufficient to adequately characterize WMA5.	See response to comment #18.
20	F-7	Section	This paragraph states ". . . radiation levels from soil	Drawing 40A-S-29 indicates that the stretch of sanitary line

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		F.4.3.1/ Para. 2	contamination hampered the project." Was the line repair made? What is the current status of this broken sewage line?	15WS902-6"-A10 from the office building south to Manhole D was sleeved with 4" coiled black plastic. These repairs are believed to have been made in 1974.
21	F-13	Section F.9.3	Due to the current activities and the addition of a potentially clean backfill, it may be beneficial to conduct the systematic surface and subsurface sampling at and around the Contractor Access Hardstand and Low-Level Radioactive Waste Rail Packaging and Staging Area (as identified in Figure F.1 for WMA 6), regardless of the GWS results, as these areas are currently being used for waste storage.	Soils beneath hardstands will be characterized after the removal of hardstand materials. Soils in the vicinity of the Low-Level Radioactive Waste Rail Packaging and Staging Area will be sampled at least to a depth of 1 m as part of characterization work to support the planned HLW Canister Interim Storage Facility per a CSAP Technical Task Order that has already been prepared.
22	F-16	Section F.9.4/2nd Bullet	This section describes the collection of soil cores around the New Sewage Treatment Facility, yet no known contamination or suspected release is mentioned for this area. Please clarify the sampling rationale.	There was historical data from the immediate vicinity of the New Sewage Treatment Facility that suggested contamination might be present in the subsurface. The purpose of these cores is to definitively establish that soil contamination is not associated with this facility.
23	F-40	Figure F.16	Clarify the reason for the "possibly > background" classification around and leading from the New Sewage Treatment Facility as there is no known contamination or suspected releases identified for this area. Similarly, why is the area around and leading from the Old Sewage Treatment Facility not classified as "possibly >background" given the significant contamination known to exist in that area? Also, correct the typographical error in the key. "Possibly >bakcground" should be amended to read "Possibly > background."	See response to Comment #22. Figure will be modified to reflect the fact that contamination above background is likely associated with the Old Sewage Treatment facility and associated waste line. Typographical error will be corrected.
24	G-3	Section G.1/WVDP Caissons/ Para. 2	In addition to the volume, it would be helpful to know the type of waste (e.g., vessels, equipment, PPE, etc.) placed in the Caisson 1.	The report, "Estimated Radionuclide Inventory for the NRC-licensed Disposal Area at the West Valley Demonstration Project" (Wild 2000), indicates that drums containing approximately 823 ft ³ of general waste and sludge from the O2 Building (the original Low-level Waste Treatment Facility) were placed in Caisson 1.
25	G-7	Section G.4.2	Being in such close proximity to the SDA, it is suggested that WMA 8 be included in the	The CSAP was intended only to discuss WMA's within its scope, but WMA 8 will be added for completeness per the

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			Potentially Affected WMAs.	suggestion.
26	G-22	Figure G.2	Assuming that “radiologically controlled” means roped off (fenced) and posted, it is unclear why half of the NDA cover is radiologically controlled and the other half is not. Please clarify why the NDA is not radiologically controlled. [Resolution of this comment may affect Figure 7 on P. 79 and Figure J.1 on p.J-19.]	The radiological controlled areas are areas defined by WVES and roped off and posted.
27	H-2	Section H.2/ Para. 2	For informational consistency between appendices, suggest adding the following sentences to the end of the paragraph. “Groundwater flows vertically through the unweathered Lavery Till to the Kent Recessional Sequence. The Kent Recessional Sequence is more permeable and does transport groundwater in a northeasterly direction, discharging to Buttermilk Creek.”	Text will be added as suggested.
28	J-1	Section J.2/ Para. 3/ Line 7	Replace “west/northwest” with “north/northeast.”	Thank you. Text will be corrected as indicated.
29	J-1	Section J.2/ Para 4/Line 1	A few man-made features currently exist in WMA 12 South: 1) A buried natural gas line services the West Valley Demonstration Project. The line crosses Frank’s Creek on the east side of the SDA, then crosses Erdman Brook just north of the SDA, and continues across WMA 12 to WMA 1. 2) An actively used, buried leachate transfer line is used to transfer leachate from the NDA interceptor trench (WMA 7) to the Liquid Waste Treatment Facility (WMA 2). The transfer line crosses Erdman Brook northwest of the NDA and continues in a northerly direction to WMA 2. 3) In 2009, NYSERDA and DOE completed erosion mitigation work on Erdman Brook and part of Lagoon Road Creek, just to the northwest of the NDA and SDA. The work included the realignment of the stream channel,	Text will be modified to reflect the information in the comment.

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			grading of a knickpoint, lining the new channel with geotextile and placing medium stone fill on top. The work was necessary to keep surface water flow in a central channel to ensure continued stability of the North Slope of the SDA.	
30	J-1	Section J.2/ Para. 4/ Lines 1-3	Records indicate that WMA 12 was disturbed by Nuclear Fuel Services (NFS) during disposal operations at the SDA (1963-1969). From the historical photographs, trucks and heavy equipment could access the northern trenches of the SDA using a road (presumably called Lagoon Road) that crossed over Erdman Brook just west of what is now known as Lagoon Road Creek. While it is unclear if trucks carrying waste used this road, the road was built by NFS for the purpose of accessing the SDA and most likely the NDA, too. Historical photographs from 1980 show that significant re-grading work was completed in the Erdman Brook corridor northwest of the SDA and NDA, and show Lagoon Road no longer in place. In addition, historical photographs also show that some of the soil excavated from the trenches (for the purpose of disposal at the SDA) was pushed over the side of the embankment that is currently known as the North Slope. [NYSERDA can provide the historical photographs referenced in this comment, should DOE decide they want them]	It would be helpful if NYSEKDA provided the referenced photographs. The question is what potential contamination issues this raises for WMA 12, and exactly where those contamination concerns would be. The topic warrants further discussion with NYSEKDA prior to modifying the CSAP.
31	J-2	Section J.4.1/ Para. 2/ Line 1	Insert "and Frank's Creek" after "... and banks of Erdman Brook)."	Text will be modified as requested.
32	J-2	Section J.4.1/ Para. 3/ Line 1	Suggest changing "possible" to "known" as there is a known area of radiological contamination on the east side of WMA 12 south extending from WMA 7 to the Erdman Brook channel.	Text will be changed as requested.
33	J-4	Section J.4.4/ Para. 2	See Comment #20.	See response to Comment #20.
34	J-5	Section J.5/	Was this hot-spot marked? With the hot spot being	A hot spot of this size would likely not be found with

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		4th Bullet	located so close to the stream channel, GWS may not be appropriate to locate is or characterize its extent. It is suggested that systematic surface soil sampling be conducted for this area.	systematic sampling. However, if activity concentrations are what is described, it would clearly be identified by the GWS. Note that the GWS protocols require complete coverage of surface areas.
35	J-6	Section J.5/ Last Para.	Qualify "groundwater" with "shallow" in this context.	Text will be qualified as indicated.
36	J-7	Section J.7/ Para 3	This section states "Any soil contamination present is expected to be limited to surface soils." Given the interpretation of the air photos, this is not a reasonable expectation. Clearly, there was a significant amount of soil pushed out of an area of known contamination, which would infer an expectation that contamination exists below 1m. Therefore, it would seem logical to sample to depth in this area, regardless of the sample results from WMA2 along the boundary of WMA 12 South.	Note that the first paragraph of this section states that subsurface contamination may exist along the border with WMA 2. Note too that significant subsurface characterization will occur along the border as part of WMA 2 sampling activities, and that as part of WMA 2 characterization activities this subsurface sampling may extend into WMA 12 to bound the lateral extent of contamination as necessary. Finally, any surface soil contamination will be sampled and pursued to depth until vertically bounded. The contamination impacts in this area based on historical information have a surface expression; consequently, DOE believes the possibility of subsurface contamination and its lateral and vertical extent along the border of WMA 2 will have been adequately addressed with the activities as proposed.
37	J-8	Section J.7/ Para. 1	This section states "Because Erdman Brook and Frank's Creek are primarily eroding features . . . one would not expect to see contamination extending more than one meter into the subsurface." This expectation does not seem realistic as the knickpoint scour pools (often deeper than 1m) observed on these stream systems are routinely filled with deposited sediments when the knickpoints migrate upstream.	To reflect the presence of knickpoints in Erdman Brook, the proposed sediment sampling will be modified to include both a 0-15 cm sample and a 25-100 cm sample.
38	J-8	Section J.7/ Para. 1	This section states "Because Erdman Brook and Frank's Creek are primarily eroding features . . . one would not expect to see contamination extending more than one meter into the subsurface." There is significant photographic evidence that large areas of the Erdman Brook valley were reworked with heavy equipment in 1980, which may have spread contamination across the valley and to a depth	If NYSERDA has information/photos showing the location of valley reworking, this would assist in developing a systematic subsurface sampling program for those portions o of the valley that might be of concern. Without more definitive information regarding the location and extent of reworking activities it would be difficult to design a sampling program that would be effective in finding any buried contamination that might be present.

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			greater than 1m. It is suggested that systematic subsurface sampling of Erdman Brook Valley be conducted.	
39	J-9	Section J.9.2/ 1st Bullet	Perennially saturated soils may constitute 50 percent of the surface area of WMA 12 South. Given the fact that GWS is not appropriate for these areas, and the fact that large areas of the Erdman Brook valley were reworked with heavy equipment in 1980, it is suggested that systematic surface soil sampling occur in these areas.	See response to Comment #6.
40	J-10	Section J.9.2/ 3rd bullet	This section states ". . . other than to address area too wet to perform a gamma walkover survey." It should be noted that these areas include groundwater seep areas downslope from WMA 2 that are likely contaminated and too wet for GWS to be appropriate.	Additional text will be added to reflect this observation.
41	J-13	Section J.9.4/ 2nd Bullet	Frank's Creek and Erdman Brook sediments should be sampled at least every 10m, not 30m, and, given the "bathtub ring" effect, lateral bounding samples should also be collected. (See Comment #9.)	See response to Comment #9. Sampling density will be increases to one sample per 10m per NYSERDA request.
42	K-1	Section K-2/ Para. 2	A more accurate description of the surface drainage for WMA12 North would be stated as it drains to the southwest through NP-1 gully into Quarry Creek.	Text will be modified as suggested.
43	K-8	Section K.9.3	Figures D-4 and D-5 (p. D-20 and D-21) indicate a road leading from the "scarred" area in WMA 12 North to the Lagoons in WMA2. Given that materials may have been transported to/from WMA 2 and significant reworking of surface soils in WMA 12 North has occurred, it is suggested that a systematic subsurface sampling be conducted in WMA 12 North.	Based on DOE's interpretation of those photographs, NA 12 North appeared to be used as a borrow area for clean soils. DOE does not see a reason for systematically sampling the subsurface.