INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| **COMMENTS** | | | | |
| 1. | Part I | iv. | **Description of the Selected Remedy, Paragraph 4** The fourth sentence ties bombing practice to the occurrence of TNT and RDX contamination that will require remediation. Please clarify the wording because this type of soil contamination is not apparent in previous documents regarding ordnance contamination and bombing practice. | Reference to the bombing practice is incorrect and was deleted from the text. |
| 2. | Part I | iv. | **Last paragraph** Please add to this paragraph the intent to develop a site-wide institutional control plan as part of OU 10-04. This approach should fit well with the prioritization of clearance actions for the ordnance sites in OU 10-04 and the need for a site-wide approach for the Institutional Control Plans at the individual WAGs where an IC Plan has not already been developed. The prioritization of sites is tied to the response to comments from those members of the public that questioned the need for ordnance clearance. | Text was added to explain a INEEL-wide institutional control plan will be developed as part of the OU 10-04 remedial design and remedial action.. |
| 3. | Part I | v. | **Selected Remedy for the Ordnance Sites, First bullet** The first bullet should address the | Prioritization of sites for remedial action will be performed during the |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | prioritization of sites for ordnance clearance since this would be the first step prior to addressing the next items in the list. The need for an improved detection technology also is needed for implementation on the geologic environment found at the INEEL. | remedial phase. In the sections describing the selected remedial alternatives, text was added indicating a phased approach for implementation of the remedy will be used. |
| 4. | Part I | v. | **Last bullet**<br>The first sentence will be stronger if "established" is replaced with 'implemented'. Please consider this change. | Text was changed as suggested. |
| 5. | Part I | v. | **Selected Remedy for TNT/RDX Contaminated Soil Sites, Paragraph 1**<br>Please insert in this paragraph a statement pertaining to the prioritization of sites for remediation. | Prioritization of sites for remedial action will be performed during the remedial phase. In the sections describing the selected remedial alternatives, text was added indicating a phased approach for implementation of the remedy will be used. |
| 6. | Part I | ix. | **Statutory Preference for Treatment, Last paragraph**<br>This one sentence paragraph seems out of context. Please consider deleting this paragraph. | Text was changed as suggested. |
| 7. | Part I | x. | **Five-Year Review Requirements, Last paragraph**<br>Please use examples more relevant to OU 10-04. Subsidence and drainage repairs | Text was changed as suggested. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | really are not applicable to the OU 10-04 sites. Perhaps using revegetation of disturbed soils sites or signs notifying people about the potential presence of ordnance would be more applicable. | |
| 8. | Part I | x. | **Record of Decision Data Certification Checklist, First three bullets**<br>These bullet items address the typical chemical or radioactive contamination issues found at the other WAGs but they do not fit the ordnance issues very well. Even though this is just a checklist, please modify the bullet items to address ordnance or develop additional bullets that address the ordnance issues in OU 10-04. | Text was changed as suggested. An additional bullet was added about how source materials constituting threats are addressed, which is also consistent with EPA ROD guidance. |
| 9. | 1. | 1. | **Part 2: Decision Summary, Paragraph 5**<br>This paragraph appears to be the first appearance of the acronym "NPG" but it is not noted in the second sentence where it is first spelled out. Please add the acronym to the second sentence. | Text was changed as suggested. |
| 10. | 2.2.1 | 5. | **Paragraph 2**<br>The second sentence states "Except for the septic system that supports the EBR-I National Historic Landmark, most of the USTs and active septic systems have been | Text was changed to clarify the active and inactive septic systems. |

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

**DOCUMENT TITLE/DESCRIPTION:** Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | removed from the EBR-I area." It is assumed the intent is to say that inactive septic systems were removed. Please verify the language used in this sentence. | |
| 11. | 2.4 | 12. | **Paragraph 2**<br>The state agency that is designated as signatory to the FFA/CO is the Idaho Department of Health and Welfare (IDHW). The Division of Environmental Quality was part of the IDHW in 1991 and did not become a department until several years later. Please correct the state agency designation in this paragraph. | The correction to the text was made as suggested. |
| 12. | 4. | 18. | **Paragraph 1**<br>The first sentence is incomplete. There appears to be a phrase or thought missing at the end of the sentence. Please verify that the sentence is conveying the complete thought.<br>The priorities spelled out for remediation in these paragraphs is in line with past discussions that are based upon comments received from the public. The three agencies involved in this action should discuss the option of presenting a matrix or other explanation to describe the thought | The first sentence was corrected. Prioritization of the sites will be defined during development of the remedial design/remedial action plan. In the sections describing the selected remedy, text was added to indicate remediation would be implemented in phases. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | process used to prioritize these actions. | |
| 13. | 4. | 18. | **Paragraph 7**<br>This paragraph should be expanded to include the site-wide IC Plan development in OU 10-04 that was going to be done under OU 10-08. The modification in the prioritization of site remedial actions is a direct spin-off from the public's comments and the need to develop the site-wide IC Plan is directly tied to the prioritization. Please expand this paragraph to incorporate a more thorough explanation. | Text was added to explain an INEEL-wide institutional control plan will be developed and implemented as part of OU 10-04 RD/RA. The prioritization of sites for remedial action will be specified during RD/RA planning. |
| 14. | 5.6 | 25 | **Paragraph 1**<br>Delete the "and" in the second sentence. | Text was changed as suggested. |
| 15. | 6.2 | 32. | **Bullet 5**<br>This statement is consistent with the land use plan but it is inconsistent with the risk evaluation which includes a future residential scenario. Please note this variation which is applied for conservatism in the risk assessment. | Text was changed as suggested to note conservatism in the risk assessment. |
| 16. | 7.1 | 34. | **Paragraph 4**<br>The statement that 'the Tribes consider all | Intact inert projectiles are saved for historical interest. This will be noted in the responsiveness section. |

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

**DOCUMENT TITLE/DESCRIPTION:** Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | contamination at the INEEL poses a threat to the traditional subsistence and spiritual ecosystem" appears to conflict somewhat with their stated views regarding the historical nature of the ordnance and their comment regarding clearance in their attached comments. It is suggested the language in this paragraph either note their view regarding the historical significance of the ordnance to the Tribes or that the statement be modified. | |
| 17. | 7.2.1 | 35 | **Paragraph 3**<br>Please spell out the terms for HTRE in the first appearance of this acronym in this location. It is in the acronym list. | Text was changed as suggested. |
| 18. | 7.2.3.3 | 40 | **First Paragraph**<br>In the last sentence, the discussion of interactions between TNT and RDX does not provide much detail, other than that the interactions are complex and can be either additive or antagonistic, depending on the effect. Since these two contaminants frequently occur together, it would be helpful to provide more information regarding how cumulative risk might be affected when they co-occur at a site. Alternatively, it can be stated that the | Text was modified to indicate the effects of TNT and RDX effects are assumed to be additive for risk evaluation at these sites. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | effects of TNT and RDX are assumed to be additive, because available toxicity information does allow other assumptions, such as reduced risk through antagonistic interaction. | |
| 19. | 7.2.4.3 | 42. | In the first sentence, change **combing** to **combining**. | Text was changed as suggested. |
| 20. | 7.2.5 | 44 | **Table 3**<br>Please rephrase the sixth topic in this table to more clearly state where GWSCREEN can account for longitudinal, lateral, and vertical dispersion. The explanation in the right hand column seems to lead the reader in an indirect understanding of the capabilities of the model versus how the model may have been applied. | Comment noted. This table was developed to further explain assumptions made in the HH BRA. One of the assumptions made in the GWSCREEN was to use the plug and flow model, this does not account for longitudinal, lateral, or vertical dispersion. This assumption is conservative in the fact that dispersion is not taken into account. This type of model only provides a lag time for the source to travel through the unsaturated zone before it reaches the aquifer. The paragraph in question does evaluate over or underestimation of risk from several sides of the issue that may have occurred in the risk assessment. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| 21. | 7.3.1 | 46. | **Table 3**<br>The use of cancer slope factors is listed as potentially overestimating risk, because slope factors are associated with 95% UCLs. Slope factors for nonradionuclide contaminants are based on an upper confidence bound on the slope of the dose-response curve, and their use is thus unlikely to underestimate risk. Slope factors for radionuclides, on the other hand, are maximum likelihood estimates, and their use represents a realistic estimate of risk, not a conservative estimate. This is an important distinction. | Under the uncertainty factor column, it now states use of the cancer slope factor is for nonradionuclides. This is also stated in the comment section. A statement regarding radionuclide slope factors was also added. |
| 22. | 7.2.5 | 50. | **Table 4**<br>The last sentence in the right hand column mistakenly refers to "sites". The lead contamination occurs only at one site. Please correct the sentence. | Text was corrected as suggested. |
| 23. | 7.3 | 43. | **First Paragraph**<br>It is stated that the results of the WAG 6 and WAG 10 ERAs were integrated into an INEEL-wide evaluation of potential risks to ecological receptors in the OU 10-04 RI/FS, and that the results and methodology are in Section 11 of the | The methodology was moved to Section 7.5. The text was changed to reflect this. |

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

**DOCUMENT TITLE/DESCRIPTION:** Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | ROD. Section 11 deals primarily with limited action, although Section 11.2.1 does discuss INEEL-wide ecological monitoring. Please clarify. | |
| 24. | 7.3.1 | 43. | **Second Paragraph, Last Sentence**<br>It is stated that all radioactive contaminants were eliminated based on comparison with ecologically based screening levels. Some readers might not be aware that the EBSLs for radionuclides are quite high compared to human health-based screening levels, since the focus in radioecological risk assessment is on reproductive effects in populations, rather than cancer in individuals. For example, the EBSL for Cs-137 is 4,950 pCi/g. Without an understanding of this fundamental difference, some readers who are aware of numerous areas on the INEEL with significant radiological contamination might find it difficult to believe that all radionuclides would be screened for ecological effects. | A statement to this effect was added in this section. |
| 25. | 7.3.2.2 | 52. | **Second Paragraph**<br>In the first sentence, changing **birds and animals** to **birds and mammals** would make this statement more accurate. | Text was changed as suggested. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| 26. | 7.3.3 | 53. | **Last paragraph**<br>Please delete "in" from the first sentence of this paragraph. It is not needed. | Text was corrected as suggested. |
| 27. | 7.3.3 | 54. | **Fourth Paragraph**<br>The third sentence is future tense, but should be past tense. "The INEEL-wide risk assessment conducted under the OU 10-04 comprehensive investigation will consider the OU 10-04 sites eliminated ... and Craters East of INTEC." | Text was corrected as suggested. |
| 28. | Table 5 | 57. | **Table 5, Footnote d**<br>Please check and correct the verb tense in the second sentence of this footnote as needed. | Text was corrected as suggested. |
| 29. | Table 5 | 57. | **Ibid., Table 5, Page 57, Footnote e**<br>The first sentence refers to "EPCs" but the acronym is not spelled out in the sentence or the acronym list. Please add the acronym to both the list and spell it out in the sentence. | Text was corrected as suggested. |
| 30. | 7.4 | 59. | **Paragraph 2**<br>The acronym "NGP" should be NPG. Please correct. | Text was corrected as suggested. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| 31. | 7.4 | 59. | **Second Paragraph**<br>In the last sentence, change **detected** to **detect**. | Text was corrected as suggested. |
| 32. | 7.4 | 60. | **Paragraph 2**<br>The bulleted items do not add up to the "nine sites" noted in the text preceding the bullets. The NPG is missing from the list. If this is the missing site, please add it to the bulleted list. | Text was corrected by adding the NPG to the list. |
| 33. | 7.5.2.1 | 65. | **Second Paragraph**<br>In the last sentence, change: "can be found from Anderson et al. (1996)." to: can be found **in** Anderson et al. (1996). | Comment incorporated as suggested. |
| 34. | 7.5.3 | 66. | **Second Paragraph**<br>Change: "summarizes the results of these efforts and discussed their implications" to: summarizes the results of these efforts and **discusses** their implications. | Text was corrected as suggested. |
| 35. | 7.5.3.2 | 69. | **Paragraph 3**<br>The intent of the last sentence in this paragraph is not clear. Please explain the relationship between the close proximity of the facilities to sensitive biological resources areas and the lack of surveying | The following text was added "..future monitoring of these areas is considered important to ensure protection." |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | of the firing fan. | |
| 36. | 7.5.6 | 76. | **Conclusions and Recommendations, Last Paragraph**<br>In the second sentence, **may possible** should be **may be possible**. Actually, if the WAG ERAs estimated risk to ecological receptors, based on conservative assumptions, that should be stated. A statement such as "some apparent risk to receptors at the sites may be possible" has so many qualifiers that it really does not say anything. | Text was corrected as suggested. |
| 37. | 8. | 78. | **Figure 13**<br>Please add MDA to this figure. The MDA is referred to in Section 8.1 but it is not designated on this figure. The reader must refer back to Figure 2 on page 3 to find the location for this ordnance site. Please add MDA to the figure. | Comment incorporated as suggested. |
| 38. | 8.6.9 | 94. | **Paragraph 2**<br>I think it is a stretch to state 'The public was supportive of the preferred alternative for the UXO Areas ..." The comments from the public, and the CAB in particular, lead us to modify the approach that will be | Text was changed to note the public concern with cost and to explain implementation of the remedy will be phased to reduce cost. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | used for remediating these sites. We are now prioritizing the sites to focus remediation on the highest risk sites first. Please revisit this text and modify to reflect our change in direction | |
| 39. | 8.7 | 94. | Please add a bullet to this list that describes our intent to prioritize sites for remediation. | The text in community acceptance section has been changed to explain a phased approach will be used in implementing the remedy, which will be developed during remedial design. |
| 40. | 8.7 | 95. | **Paragraph 2**<br>Please refer to the modified Figure 13 in the first sentence, with the addition of MDA, instead of Figure 2 which is at the beginning of the document. | Text was corrected as suggested. |
| 41. | 8.7 | 95. | **Last paragraph**<br>Please insert language in this paragraph outlining our need to develop a site-wide IC Plan under OU 10-04. | Section 11 was modified to fully explain development and implementation of an INEEL-wide institutional control plan. |
| 42. | 8.7.1 | 96. | **Table 10**<br>The "Net Present Value" for "Deed restriction reviews" seems inordinately large. Please verify this projected cost. | The need for deed restriction reviews during the 100 year period of institutional controls is not required, therefore this cost element was deleted. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| 43. | 8.8.2 | 98. – 99. | **Table 11**<br>Please add a footnote to describe the letter "A" in the right hand column and other letter designations that could be used. | Text was corrected as suggested. |
| 44. | 9. | 103. | **Figure 18**<br>Please correct the spelling of the term used to describe the TNT. | Text was corrected as suggested. |
| 45. | 9.2.1 | 106. | **Paragraph 1**<br>Please round "32.8-ft" to 33 ft to be consistent with page 101. | Text was corrected as suggested. |
| 46. | 9.2.3.1 | 107. | **Second Paragraph**<br>It is stated that the total estimated risk for all pathways for the 100-year future residential scenario at the Experimental Field Station is less than 1E-04, and the exposure point concentration for TNT is listed as 1,100 mg/kg in Table 14. However, the risk for the same scenario at the Fire Station II Zone and Range Fire Burn Area is listed as being equal to 1E-04 on page 105, and Table 12 shows the exposure point concentration for TNT at this site to be 130 mg/kg. Please explain this discrepancy. It may be possible for the risk at the Fire Station II Zone and | Comment incorporated. The phrase ". . future residential scenario is 1E-04 (1 in 10,000) from TNT." was changed to ". . future residential scenario is 1E-04 (1 in 10,000) from TNT primarily." The exposure point concentrations for the Fire Station II Zone and Range Fire Burn Area are 48.5, 3.2, and 0.7 for the residential scenario (this site have more than one sub-area with TNT contamination). The exposure point concentration for the Experimental Field Station was 56.7 for the residential scenario. TNT was the primary COC at both of these sites. Phenanthrene did slightly |

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | Range Fire Burn Area to exceed that at the Experimental Field Station based on other contaminants. Since the tables list only TNT, it can be assumed that this was the only contaminant above risk-based concentrations at both sites. | elevate the risk from dermal absorption of soil at the Fire Station II Zone and Range Fire Burn Area, but cancer risks from all other exposure pathways were from TNT. The risk for the future residential scenario at the Experimental Field Station was 9E+05. |
| 47. | 9.5.1 | 113. | **Paragraph 2** Please round "32.8-ft" to 33 ft to be consistent with page 101. | Text was corrected as suggested. |
| 48. | 9.7.4 | 120. | **Table 24, Criteria column** Ground water is two words when referenced in IDAPA. Please correct. | Text was corrected as suggested. |
| 49. | 9.9.1 | 128. | **Table 25** The "Net Present Value" for "Deed restriction reviews" seems inordinately large. Please verify this projected cost. | The need for deed restriction reviews during the 100-year period of institutional controls is not required, therefore this cost element was deleted. |
| 50. | 9.10.2 | 131. | **Table 26** The first column should be changed to reflect the spelling of ground water as two words to match the spelling used by the State. | Text was corrected as suggested. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | The third description in the column under "Reason" should be changed to use the correct spelling of remediation.<br>Please add a footnote to describe the letter "A" in the right hand column and other letter designations that could be used. | |
| 51. | 10.4 | 137. | **Last paragraph**<br>Please correct the last acronym to reflect the presence of only one COC. | Text was corrected as suggested. |
| 52. | 10.5.3 | 142. | **Table 30, First column**<br>Please correct the spelling of ground water in the reference to the State standards. As noted previously, it is spelled as two words in the standard. | Text was corrected as suggested. |
| 53. | 10.6.1 | 140. | The last sentence appears to misstate the ability of natural processes to render 'lead nontoxic or hazardous." Please check the wording of this sentence and correct as needed. | Text was revised to clarify the hazardous of lead at the site. |
| 54. | 10.6.7 | 145. | Please delete "for" in the first sentence.<br>Please add 'for' to the second sentence before "Alternative 1." | Text was corrected as suggested. |
| 55. | 10.6.9 | 146. | **Paragraph 1**<br>Please correctly spell 'public' in the | Text was corrected as suggested. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | second sentence. | |
| 56. | 10.7 | 147. | **Paragraph 1**<br>Environment should be singular in the third sentence. Please correct. | Text was corrected as suggested. |
| 57. | 10.7 | 146. | **Bullet 2**<br>Please change "physical" to the adverb form. | Text was corrected as suggested. |
| 58. | 10.8.2 | 149. | **Table 32**<br>Please spell ground water as two words when referring to the State's rule.<br>Please add a footnote to describe the letter "A" in the right hand column and other letter designations that could be used. | Text was corrected as suggested. |
| 59. | 11. | 153. | **Paragraph 1**<br>Please insert the need to develop a site-wide IC Plan in OU 10-04 for the reasons noted previously. | Text was added to explain an INEEL-wide institutional control plan will be developed during 10-04 remedial design. |
| 60. | 11.1 | 153. | **Paragraph 3**<br>Please modify this paragraph or add a paragraph to include site-wide IC Plan development. | Text was added to explain an INEEL-wide institutional control plan will be developed during 10-04 remedial design. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| 61. | 11.1 | 157. | **Table 33**<br>The second and third descriptions in the column titled "Basis for No Action or Institutional Controls" refer to "UTS" which is assumed to be UST. Please correct or identify "UTS". | Text was corrected as suggested. |
| 62. | 11.1 | 161. | The second description in the right hand column refers to "may not be practical or feasible in some. | See response to IDEQ #63. |
| 63. | 11.1 | 162. | The second description in the right hand column refers to "may not be practical or feasible in some area." Please make "area" plural. | Text was corrected as suggested. |
| 64. | 11.1 | 170. | The first description under "Site Name" refers to "Ordnance & Dry Explosives" which is assumed to refer to the riverbed. Please correct. | The phrase, "Ordnance & Dry Explosives East of the Big Lost River" is the accepted name of this ordnance site. |
| 65. | 11.1 | 154. | **Paragraph 2**<br>The reference to an "O&MM Plan (first sentence) is assumed to be an O&M Plan (second sentence). Please correct or modify this paragraph and the following section to also refer to an O&MM Plan. | Text was corrected as suggested. |
| 66. | 11.2 | 184. | **Last paragraph**<br>Please correct the reference from OU 10- | Text was corrected as suggested. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | 08 to 10-04 for the site-wide IC Plan. | |
| 67. | 11.2.1 | 185. | **Paragraph 3**<br>The second sentence should refer to "ecologically sensitive" areas, not "area". Please correct. | Text was corrected as suggested. |
| 68. | 13. | 189. | It seems appropriate to describe the changes made since receiving comments from the public on the Proposed Plan. The prioritization of the sites for remediation and the placement of the IC Plan in this OU deserves discussion | The text has been changed to explain a phased approach will be used in implementing the remedy, which will be developed during remedial design. |
| 69. | 13.2 | 189. | **Last paragraph**<br>Please change "effect" to 'affect' in the last sentence. | Text was corrected as suggested. |
| 70. | Part III | 203-243 | **Part 3: Responsiveness Summary**<br>Please review all responses to comments from the public to ensure the responses are informative and truly responsive. The general tone of some of the responses needs modification. | The responses to comments were revised to be more responsive and considerate. |
| 71. | Part III | 203. | **Draft Response 2[a], First paragraph**<br>Please replace "than" with 'then' in the sixth sentence. | Text was corrected as suggested. |

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

**DOCUMENT TITLE/DESCRIPTION:** Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| 72. | Part III | 210. | **Draft Response 6 [a], Item 2**<br>Please replace the single parenthesis with a comma. | Text was corrected as suggested. |
| 73. | Part III | 210. | **Last paragraph**<br>The end of the second sentence requires some editing to clarify whether you are trying to say "significantly" or "spatially" or both. | The term 'spatially' was deleted. |
| 74. | Part III | 212. | **Draft Response 6 [c], First paragraph**<br>Please delete "of"; it is not needed in this sentence. | Text was corrected as suggested. |
| 75. | Part III | 213. | **Draft Response 11**<br>The reference to "geological surveys" should be changed to 'geophysical surveys'. | Text was corrected as suggested. |
| 76. | Part III | 218. | **Draft Response 18[c], Paragraph 5**<br>Please insert 'a' before "localized hotspot" for readability. | Text was corrected as suggested. |
| 77. | Part III | 221-222. | **Draft Response 21[b]**<br>This response only portrays the positive aspects of using airborne surveys. It is recommended that this response be expanded to point out some of the negative | Comment noted. The ROD now states that wide-scale UXO detection and mapping will be postponed until more cost-effective technology is demonstrated and proven. In addition to magnetometers, helicopter |

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

**DOCUMENT TITLE/DESCRIPTION:** Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | aspects of airborne survey technologies which can be focused on maybe just two of the common technologies. It can be pointed out that airborne magnetic surveys or similar surveys that are dependent upon the presence of ferrous metal are of limited usefulness in basalt terrain because of interference from the iron rich minerals in basalt. Airborne thermal imagery is limited to shallow depth detection of materials exhibiting different thermal properties than the surrounding soil, rock, and vegetation. All airborne technologies are limited by the altitude imposed on the aircraft and the sensitivity to increased flight altitudes imposed for safety considerations. | conductivity meters are being demonstrated, which are not limited to detection of ferrous items and is also effective in terrain dominated with basalt. While there are safety and security issues that must be addressed, DOE-ID safety and security have confirmed that these issues can be addressed and that approval to perform aerial surveys can be obtained. |
| 78. | Part III | 222. | **Draft Response 21[e], Bulleted items**<br>This list is not consistent with the results of the preliminary matrix attempt to prioritize the ordnance sites for remediation. This list should be modified to reflect the prioritization.<br>The first paragraph uses Adak Island in Alaska as an example for evaluating and remediating UXO. It is my understanding that airborne surveys are not a component of the CERCLA action on Adak Island | The text has been revised to indicate remediation will be phased and large-scale UXO survey postponed until more cost-effective technology became available.<br>The example of Adak Island is used in regard to the process of assessing risk from UXO, determining the extent of UXO removal to allow specified land use, and establishing appropriate institutional controls. The |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | because of terrain, vegetation, and weather. Please verify that this is a good example to cite for the proposed efforts at the INEEL.<br>The second paragraph refers to a helicopter-based airborne survey technology that has been investigated by the site. The paragraph fails to mention that the INEEL safety people have not approved this technology because of the low altitude needed for adequate ordnance detection sensitivity and the speed required for efficiency in covering the large ordnance areas. Please note the safety concern expressed by the INEEL. | method for UXO detection is not the issue, but rather how the information from UXO surveys is used to make decisions regarding UXP removal and defining land use options.<br>DOE-ID safety has recently confirmed that approval can be obtained to perform aerial survey if all safety requirements can be met. The system developed at Oak Ridge National Laboratory meets or is close to meeting these requirements. |
| 79. | Part III | 225. | **Draft Response 24[b]**<br>Please insert 'are' in front of "found on the INEEL" in the second sentence. | Text was corrected as suggested. |
| 80. | Part III | 228. | **Draft Response 25[b]**<br>The last sentence is very strongly worded. It seems appropriate to reword the last sentence on this page to indicate the Tribes find current solutions accepted at other sites by other Tribes to not be satisfactory. It is possible that a better solution will be found at another site in the future that they | The text was revised to indicate DOE will pursue conservative remedial approaches to address tribal concerns. |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | may find acceptable. | |
| 81. | Part III | 238. | **Comment 26 Draft Response, Human Health Standards, Paragraph 2**<br>Please insert 'that' after "process" for readability in the first sentence.<br>Please replace "contaminates" with 'contaminants' in the second sentence. | Text was corrected as suggested. |
| 82. | Part III | 240. | **Unexploded Ordnances**<br>The first paragraph of this draft response does not state any of the known limitations of airborne survey technologies. It seems appropriate to point out a few of the limitations as noted previously. | The text has been revised as follows to indicate issues associated with aerial, towed, and hand-held detection methods:<br>"The OU 10-04 feasibility study identifies, describes in detail, and evaluates the proven geophysical methods to detect the type of UXO present at the INEEL. Alternative methods considered for UXO detection and mapping included detection systems towed by land-based vehicles and hand-held instruments. Use of a towed system requires that all vegetation be removed, thus requiring vast amount of vegetation to be destroyed. Towed systems are also limited to covering |

Last saved by fenst

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

**DOCUMENT TITLE/DESCRIPTION:** Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | | about 50 acres/day as opposed to 200 – 500 acres/day by an airborne system. Use of hand-held UXO detection instruments is very slow and labor intensive, as only a few acres can be covered per day per technician. All methods can be performed safely although the safety requirements are highest for the airborne survey methods." |
| 83. | Part III | 243. | **Responsiveness Summary References**<br>Please verify that the correct title is listed for authors VanHorn, Hampton, and Morris, April 1995. The title does not appear to be correctly cited. | This was corrected. |
| 84. | 9.10.2 | 129-130. | **ARARs**<br>This section refers to potential soil concentrations that should not exceed "1% (10,000 ppm) TNT and RDX when excavated ..." The section also links potential TNT soil concentrations of greater than 10,000 ppm to the soil being considered RCRA regulated, apparently as reactive (D003) hazardous waste. This linkage is not apparent and clarification is requested. | The U.S. Army Corps of Engineers reviewed a report prepared by Arthur D. Little "Testing to Determine Relationship Between Explosive Contaminated Sludge Components and Reactivity" and concluded that, for environmental media contaminated with secondary explosives at a concentration of 10% or greater, these soils should be considered RCRA |

INEEL
Idaho National Engineering & Environmental Laboratory

**PROJECT DOCUMENT REVIEW RECORD**

**DOCUMENT TITLE/DESCRIPTION:** **Waste Area Groups 6 and 10: *Draft Record of Decision Experimental Breeder Reactor-1/Boiling Water Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Revision Draft A, April 2002, (Operable Units 6-05 and 10-04)**

**DATE:** 1st set - June 25; 2nd set - July 1, 2002 **REVIEWER:** IDEQ

| ITEM NUMBER | SECTION NUMBER | PAGE NUMBER | COMMENT | RESOLUTION |
|---|---|---|---|---|
| | | | | reactive and would require a D003 waste code.<br>Reference: USACE HQ Environmental Division Lessons, October 30, 2002, "Classification and Management of Soils Containing Secondary Explosives" |