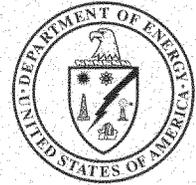


DOE/ID-11033
January 2003
Revision 0



U.S. Department of Energy
Idaho Operations Office

The 2002 Institutional Controls Monitoring Report for Operable Unit 3-13



Idaho National Engineering and Environmental Laboratory

**DOE/ID-11033
Revision 0**

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January 2003

**Prepared for the
U.S. Department of Energy
Idaho Operations Office**

ABSTRACT

This report documents results of the annual inspection to verify implementation of the institutional controls (ICs) specified in the Waste Area Group 3 Operable Unit 3-13 Record of Decision. The inspections of ICs are required to be conducted annually. The Institutional Control Plan for the Idaho Nuclear Technology and Engineering Center was used as the basis for conducting the annual inspection. Information, including detailed site maps, ICs, and checklists, is available from that document.

WAG 3 inspections of release sites requiring ICs were conducted by the Idaho National Engineering and Environmental Laboratory on May 7, 8, 9, and 13, 2002. Representatives of the United States Department of Energy Idaho Operations Office, Environmental Protection Agency Region 10, and the Idaho Department of Environmental Quality conducted independent inspections of selected release sites on June 19 and 20, 2002. This report documents the observations of each of the inspections conducted.

SUMMARY

The purpose of this report is to document the results of the annual inspection of the institutional controls (ICs) associated with Waste Area Group (WAG) 3, Operable Unit (OU) 3-13 at the Idaho National Engineering and Environmental Laboratory (INEEL). The Record of Decision (DOE-ID 1999) identifies the use of institutional controls as necessary to protect human health and the environment from contaminated sites. These controls are identified in the Institutional Control Plan for the Idaho Nuclear Technology and Engineering Center, Waste Area Group 3, Operable Unit 3-13 (DOE-ID 2003).

The INEEL conducted inspections of the sites requiring institutional controls on May 7, 8, 9, and 13, 2002. Representatives of the Department of Energy Idaho Operations Office, Environmental Protection Agency Region 10, and the Idaho Department of Environmental Quality conducted independent inspections of selected release sites on June 19 and 20, 2002. Inspections were conducted in accordance with the current Institutional Controls Plan for WAG 3. This Institutional Controls Monitoring Report documents the observations of each of the inspections conducted and provides recommendations and suggestions for future inspections given by the regulatory Agencies.

Based upon the inspections conducted of the 63 WAG 3, OU 3-13, Comprehensive Environmental Response, Compensation and Liability Act sites that require Institutional Controls, no significant deficiency was observed with respect to institutional controls that would impact human health or the environment. Of the 63 sites only 10 sites had minor deficiencies.

CONTENTS

ABSTRACT	iii
SUMMARY	v
ACRONYMS	ix
1. INTRODUCTION/PURPOSE.....	1
2. INSPECTION SUMMARY.....	2
2.1 Facility-Wide Requirements.....	2
2.2 Results of the Field Inspection	2
2.3 Document Reviews.....	3
2.4 Summary of Deficiencies and Corrective Measures	3
2.4.1 2001 Deficiencies, Corrective Actions, and Status	4
2.4.2 2002 Deficiencies, Corrective Actions, and Status	4
2.4.3 2002 Action Items, Deficiencies, Corrective Actions, and Status.....	4
3. REFERENCES	15
Appendix A—Institutional Controls Field Inspection Checklists.....	17
Appendix B—Summary of 2002 Group 4 and Group 5 Well Deficiencies.....	47
Appendix C—Agencies’ Institutional Controls Field Notes and Minutes from Kick-off and Close-out Meetings.....	51

TABLES

1. 2001 deficiencies, corrective actions, and status	5
2. 2002 deficiencies, corrective actions, and status	9
3. 2002 Agency action items, corrective actions, and status.....	12

ACRONYMS

BBWI	Bechtel BWXT Idaho
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFLUP	Comprehensive Facilities and Land Use Plan
DOE	Department of Energy
DOE-ID	Department of Energy Idaho Operations Office
EPA	Environmental Protection Agency
IC	institutional controls
ICARE	Issue Communication and Resolution Environment
ICMR	Institutional Controls Monitoring Report
ICPP	Idaho Chemical Processing Plant
IDEQ	Idaho Department of Environmental Quality
INEEL	Idaho National Engineering and Environmental Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center
NEPA	National Environmental Policy Act
NFA	No Further Action
NOD	Notice of Disturbance
OU	operable unit
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
TBD	to be determined
USGS	United States Geological Survey
WAG	waste area group
WCF	Waste Calcining Facility

The 2002 Annual Institutional Controls Monitoring Report for Operable Unit 3-13

1. INTRODUCTION/PURPOSE

The purpose of this report is to document the results of the annual institutional control (IC) inspection conducted for Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) sites in Waste Area Group 3 (WAG 3), Operable Unit (OU) 3-13 at the Department of Energy's (DOE's) Idaho National Engineering and Environmental Laboratory (INEEL). The Idaho Nuclear Technology and Engineering Center (INTEC) is designated as WAG 3, OU 3-13, and was formerly known as the Idaho Chemical Processing Plant (ICPP). An annual inspection is required by the WAG 3, OU 3-13 Record of Decision (ROD) (DOE-ID 1999) and the WAG 3 Institutional Control Plan (DOE-ID 2003). This report does not replicate detailed information (e.g., site descriptions, site maps, ICs) provided in the Institutional Control Plan. This report includes the following information:

- The results of the field inspection, including checklists, visual inspection results, and reviews of selected Notice of Disturbance documentation
- Deficiencies
- Improvements.

2. INSPECTION SUMMARY

The INEEL conducted an inspection to verify implementation of the specified institutional controls at release sites on May 7, 8, 9, and 13, 2002. On June 19, 2002, representatives of the Department of Energy Idaho Operations Office (DOE-ID), the Environmental Protection Agency (EPA), and the Idaho Department of Environmental Quality (IDEQ) conducted an independent inspection of selected sites. A follow-up inspection was conducted by the INEEL on August 15, 2002, to verify the status of corrective actions identified during the 2002 inspections. All of the 2002 inspections used the checklists available in the IC Plan (DOE-ID 2001). The following sections outline the methodology used to conduct and the results of the 2002 IC inspections.

2.1 Facility-Wide Requirements

The INEEL Comprehensive Facilities and Land Use Plan (CFLUP) provides guidance on facility and land use at the INEEL through the 100-year (year 2095) scenario (DOE-ID 1996). The CFLUP includes the following specific information about the INTEC facility:

- A map based on surveyed coordinates of the institutionally controlled release sites
- A list of required ICs for each release site
- The objective of the control or restriction
- The control or restriction
- The time frame that the restrictions apply
- A point of contact.

The CFLUP was not included for review during the 2002 inspection due to formal direction from the White House that requires all federal agencies (including DOE and the INEEL) not to release any information about contaminated sites. This directive is in response to the September 11, 2001, terrorist attacks. DOE is reviewing how to classify the CERCLA sites information in the CFLUP. The CFLUP electronic version is anticipated to be made available to on-Site resources to assist in complying with the WAG 3 IC Plan. A hard copy document may be revised and released as a sensitive document (Official Use Only) in the future.

2.2 Results of the Field Inspection

The INEEL performed the field inspection on May 7, 8, 9, and 13, 2002, using the checklists in the IC Plan (DOE-ID 2001). During the field inspection, the previously identified deficiencies from the 2001 inspection were assessed to determine if the appropriate corrective measures were performed, in addition to the requirements specified in the IC Plan. Additionally, the INEEL conducted a follow-up inspection on August 15, 2002, to status corrective actions for deficiencies identified during the 2002 inspections. Copies of completed checklists from the field inspections are provided in Appendix A. Additionally, Appendix B contains a summary of the deficiencies discovered during the inspections of the 2002 Group 4 and Group 5 wells. The deficiencies for the wells have been submitted to the INEEL Issue Communication and Resolution Environment (ICARE) system for corrective actions and tracking.

The results of the June 19 and 20, 2002, field inspection by DOE-ID and the Agencies and the kick-off and closeout meeting minutes for those inspections are included in Appendix C.

There have been no significant changes at the WAG 3 sites since the previous inspection; therefore, it was determined that photographs were not required for this annual report.

2.3 Document Reviews

As identified in the 2001 Institutional Controls Monitoring Report (ICMR), a list of the Notice of Disturbance (NOD) documents completed between March 2001 and May 2002 was provided to the EPA and State of Idaho. The list consisted of 13 NODs. The Agencies selected the four NODs listed below for a complete review:

- INTEC-OU3-13-D01-Emergency #1 – Clean-up of Oil Spill East of CPP-655
- INTEC-OU3-13-D01-09 – Installation of New Electrical Duct Banks
- INTEC-OU3-13-D01-03 – West Valley Fuel Project
- NUMBER 56 – Replace T in Firewater Line Near CPP-651.

The Agencies' review included the NOD document, associated work order, and training records for the personnel working on the NOD.

The Agencies also requested the documentation for the in-progress NOD listed below. The Agencies were provided with a copy of the NOD, associated work order, and training records of the personnel working on the following NOD:

- INTEC-OU3-13-D02-01 – Utilities Installation to the New Spent Nuclear Fuel Facility.

Records associated with work orders and training are the responsibility of the individual projects. The following deficiencies were identified in the records reviewed by the Agencies: NOD INTEC-OU3-13-D01-09 did not include training records for three individuals listed on the JSA; INTEC-OU3-13-D01-03 did not include training records for six of seven individuals listed in the pre-job briefing; Number 56 did not include training records for one of twelve individuals listed in the JSA; INTEC-OU3-13-D02-01 did not include a work order. In addition, the type of documentation provided with each NOD was inconsistent.

2.4 Summary of Deficiencies and Corrective Measures

Deficiencies and associated corrective measures were documented during the inspections and are included in the IC inspection checklists (Appendix A). The regulatory Agencies' representatives provided additional recommendations for various aspects of the ICs, the Institutional Control Plan, the institutional controls inspection checklists, and upcoming inspections. The deficiencies and corrective measures previously identified during the 2001 IC inspection were assessed to ensure that the appropriate corrective measures had been implemented. The following sections describe the deficiencies, proposed corrective action, and current status by year beginning with the 2001 inspection.

2.4.1 2001 Deficiencies, Corrective Actions, and Status

Table 1 provides a listing of the deficiencies and corrective actions from the 2001 IC inspections. The current status of the corrective actions for the deficiencies has been provided by the INEEL.

2.4.2 2002 Deficiencies, Corrective Actions, and Status

Table 2 provides a listing of the deficiencies and corrective actions from the 2002 IC inspections. The current status of the corrective actions from the 2002 IC inspections, as identified by the INEEL, is also provided.

2.4.3 2002 Action Items, Deficiencies, Corrective Actions, and Status

Table 3 provides a listing of the action items that came from the Agency inspections in June 2002. Current status, as identified by the INEEL, is also provided in the table.

Table 1. 2001 deficiencies, corrective actions, and status.

2001 Deficiency Location	2001 Deficiency Identified	Corrective Actions	Status
Overall inspections	<ol style="list-style-type: none"> 1. Revise inspection checklists to add a signature line for DOE-ID to the inspection checklists; change “observed boundary monuments” to “observed boundary monuments or fixed building/fence structure” as applicable. 	<ol style="list-style-type: none"> 1. Revised IC checklists w/ signature line. Added footnote to checklists that “Boundary monuments may be a fence corner or building.” 	<ol style="list-style-type: none"> 1. Complete May 2002.
	<ol style="list-style-type: none"> 2. Provide a discussion in the IC Plan concerning the use of survey boundary marker pins versus survey points associated with permanent structures such as buildings or fences. 	<ol style="list-style-type: none"> 2. Revised Section 4.1 to include the language. 	<ol style="list-style-type: none"> 2. IC Plan revision is scheduled for completion in January 2003.
	<ol style="list-style-type: none"> 3. The IC inspection checklist discussion should be modified to reflect that a sample of NODs/training records would be spot-checked during the IC inspections. 	<ol style="list-style-type: none"> 3. Footnote on checklist identifies that “Agency inspectors may assess a random sampling of this information to determine if there are any deficiencies.” 	<ol style="list-style-type: none"> 3. Complete May 2002.
	<ol style="list-style-type: none"> 4. Section 4.7.3 in the 2001 IC Plan should be modified to reflect the statement that training records will only be spot-checked. 	<ol style="list-style-type: none"> 4. Section 4.7.3 will be revised in the 2002 update to the IC Plan. 	<ol style="list-style-type: none"> 4. IC Plan revision is scheduled for completion in January 2003.
	<ol style="list-style-type: none"> 5. Revise the IC checklist to read “evidence of unauthorized human intrusion.” This will help to eliminate confusion associated with existing or authorized intrusions at WAG 3 sites. 	<ol style="list-style-type: none"> 5. IC checklist was revised as requested. 	<ol style="list-style-type: none"> 5. Complete May 2002.

Table 1. (continued).

2001 Deficiency Location	2001 Deficiency Identified	Corrective Actions	Status
INEEL CFLUP	Revisions are being made to the CFLUP, but document is not yet available to general public.	The CFLUP is not yet available to the general public due to issues associated with Homeland Security.	The INEEL classifiers are reviewing the information that may be released for the CFLUP and institutional controls at WAG 3. The classifiers' decision on what information may be released should be available prior to the 2003 IC monitoring inspections.
Group 1 – Tank Farm Interim Action	<ol style="list-style-type: none"> 1. CPP-58 had signs on three sides/approaches. Construction prevented the posting of the fourth sign. 2. Add CPP-26 to the list of sites included in the tank farm. 	<ol style="list-style-type: none"> 1. Additional contamination was found during construction. CPP-58 was made larger and site has been surveyed in and signed. 2. CPP-26 was added to the Group 1 list. 	<ol style="list-style-type: none"> 1. Complete August 2002. 2. Complete August 2002.
Group 2 – Soils Under Buildings and Structures	CPP-41A did not have signage on one side of the site due to an equipment lay-down area. Site was surveyed and marked.	CPP-41A still has only one sign. It was decided during the inspection that this was adequate for the site.	Complete June 2002.

Table 1. (continued).

2001 Deficiency Location	2001 Deficiency Identified	Corrective Actions	Status
Group 4 – Perched Water	1. The ROD requires a DOE-ID directive to restrict drilling in the contaminated zone.	1. DOE-ID has identified that the Environmental Checklist process will serve as the directive for restricting groundwater use at INTEC.	1. The Agencies will assess whether the DOE directives associated with National Environmental Policy Act (NEPA) analysis and approvals may be used in place of the DOE directive on groundwater use. A new section will be included in the IC Plan that discusses the NEPA analysis in lieu of the DOE-ID Directive. Completion of the plan is expected in January 2003.
	2. Well inspection checklists were not available; however, the Long-Term Stewardship Program is developing checklists that can be used for the 2003 inspections.	2. Begin using the Long-Term Stewardship well inspection sheets	2. Next year, well inspection checklists from the Long-Term Stewardship Program will be used to supplement the Agency review of Group 4 and Group 5 wells.
	3. Wells PW-2, PW-4, PW-6, and USGS-50 have crumbling concrete pads around the base of the wells.	3. Pad on PW-6 was repaired but pads on the other wells were still crumbling, no maintenance had been performed on the well bases.	3. An ICARE was filed on the potential deficiencies so that they can be corrected. See Appendix B for a listing of deficiencies found during the 2002 inspections.

Table 1. (continued).

2001 Deficiency Location	2001 Deficiency Identified	Corrective Actions	Status
Group 5 – Snake River Plain Aquifer	1. The ROD requires a DOE-ID directive to restrict drilling in the contaminated zone.	1. DOE-ID has identified that the Environmental Checklist process will serve as the directive for restricting groundwater use at INTEC.	1. The Agencies will assess whether the DOE directives associated with NEPA analysis and approvals may be used in place of the DOE directive on groundwater use. A new section will be included in the IC Plan that discusses the NEPA analysis in lieu of the DOE-ID Directive. Completion of the plan is expected in January 2003.
	2. Several wells were found to have potential deficiencies. These included USGS-35, USGS-47, USGS-49, USGS-52, LF2-11, LF2-12, LF3-09, LF3-10, LF3-11, and LF3-11A (see Group 5 checklists for specific details of the deficiencies).	2. Begin using the Long Term Stewardship well inspection sheets.	2. Next year, well inspection checklists from the Long-term Stewardship Program will be used to supplement the Agency review of Group 4 and Group 5 wells.
	3. Well inspection checklists were not available; however, the Long-Term Stewardship Program is developing checklists that can be used for the 2003 inspections.	3. The following wells still had potential deficiencies: USGS-35 through USGS-39, USGS 43, USGS-46, USGS-49, USGS-121, LF2-09, LF2-10, LF2-12, LF3-08, LF3-11, and LF3-11A.	3. An ICARE was filed on the potential deficiencies so that they can be corrected. See Appendix B for a listing of deficiencies found during the 2002 inspections.
Group 6 – Buried Gas Cylinders	CPP-84 - No survey boundary monuments were observed.	The survey is scheduled.	Complete July 2002.

Table 2. 2002 deficiencies, corrective actions, and status.

Group No.	Site ID	2002 Deficiency	Corrective Actions	Status
1	CPP-58	Site and new contamination area need to be resurveyed and boundary markers placed at four corners of the site.	New survey boundary markers were installed in August 2002. Signs still need to be put up on the south and west sides of the site. Signs need to be revised to include the potential hazard due to the nitric acid release.	Signs revised to include new contaminate. Signage is scheduled for installation in January 2003.
2	CPP-68	Survey boundary markers could not be found for this site. It appeared that the existing markers might have been covered over with asphalt.	New survey boundary markers for this site were installed in 2002.	Complete August 2002.
3	CPP-48	The Site is located in the wrong place. Site is located to the east of the posted site.	Following the Agency inspection, additional investigation of site documentation has been performed to properly locate the site. Site is being resurveyed in the correct location. The site is located approximately 13 ft to the east of the existing french drain.	Complete September 2002.
3	CPP-55	One signpost was bent over.	Signpost was replaced.	Complete May 2002.
3	CPP-09	Survey boundary marker missing on the SE corner of the site.	Site boundary marker on the SE corner of the site was installed in August 2002.	Complete August 2002.
3	CPP-37A, -37B, and -37C	Sites need to be resurveyed to delineate the new boundaries. Sign on the West Corner needs the correct contact phone number placed on it.	A new contact number was placed on the sign in the west corner. The new site has not been resurveyed; still awaiting the approved New Site ID form.	The survey of the new Site CPP-37C and the expanded Site CPP-37B is scheduled for completion in January 2003. Signage is scheduled to be placed following the completion of the survey.

Table 2. (continued).

Group No.	Site ID	2002 Deficiency	Corrective Actions	Status
3	CPP-14	Survey boundary marker on the east point of the site between Bldg. 664 and 654 on Cedar Street is missing. The marker might have been covered over with test material from the Tank Farm Cap test.	The boundary marker was reinstalled in August 2002.	Complete August 2002.
3	CPP-36	Survey boundary marker on the NE corner near Bldg. CPP-708 is missing.	Survey boundary markers were installed in August 2002.	Complete August 2002.
4 & 5	N/A	The specific deficiency items found during the inspections of the wells in Group 4 and Group 5 have been documented in the ICARE system. However, the biggest issue with all the wells remains to be locks (missing or not secure enough to prevent entry into the well) and the deterioration of the concrete pads. Also, Group 5 Wells LF2-12 and LF3-11 were missing abutments around the wells. See Appendix B for a complete listing of deficiencies.	None at this time. The ICARE system requires that corrective action be performed on the wells to correct the deficiencies found during the 2002 monitoring inspections. USGS was notified of deficiencies on wells that they control.	ICARE # 27977 is in the system. Completion dates have not been assigned.
6	CPP-84	Survey boundary markers are needed on the four corners of this site. North arrows need to be replaced on all the signs.	Survey boundary markers were installed in August 2002. North arrows have not been replaced.	North arrows will be replaced prior to the 2003 IC inspections.
6	CPP-94	Gas cylinders have been removed; however, the site should have surveyed boundary markers placed on the four corners of the site.	No change in this site.	Survey should be complete and markers in place by the 2003 IC Inspections.
NFA	CPP-95	If survey coordinates are available for this site, then they should be recorded on a map that can be shown to the Agencies during their inspections.	No change in this site.	Not applicable.

Table 2. (continued).

Group No.	Site ID	2002 Deficiency	Corrective Actions	Status
Document reviews	N/A	NOD # INTEC-OU3-13-DO1-Emergency #1 had no training records or listing of personnel that worked on the job in the File. STD 101-Integrated Work Control Process does not require formal work packages for this type of activity.	Guidance is being prepared for the NOD process and a formal closeout will be part of the NOD guidance. The NOD requestor/project will be responsible to maintain and make available all work control records associated with the NOD for audit purposes.	Complete September 2002.

Table 3. 2002 Agency action items, corrective actions, and status.

Agency Action Items	Corrective Actions	Status
1. INEEL will check with other DOE sites to determine if the INEEL response to safeguarding government records is consistent. EPA will also do an internal check. The Agencies can then address affected IC items such as using the CFLUP for IC tracking, noticing stakeholders of IC changes, and the distribution of the IC Plan and ICMR.	To be determined (TBD) by DOE and the Agencies.	Completion expected prior to 2003 IC monitoring inspections.
2. The INEEL Long-Term Stewardship monitoring well checklist does not include an inspection of USGS wells. This needs to be resolved so that a reliable process for performing an IC inspection of WAG 3 monitoring wells can be adopted.	TBD by DOE and the Agencies.	Completion expected prior to 2003 IC monitoring inspections.
3. The description column in Item 6 of the Group 2 inspection checklist needs to be completed with the status of each Group 2 site as described in the Closure Evaluation Criteria and Checklist flowchart.	The 2002 version of the IC Plan includes this change.	IC Plan revision is scheduled for completion in January 2003.
4. The IC Plan needs to be revised to explain how the NEPA process can be used in place of a new DOE directive to control use of site groundwater.	The 2002 version of the IC Plan has been revised to complete this action item.	IC Plan revision is scheduled for completion in January 2003.
5. The Group 1 checklist needs to be revised to eliminate individual columns for sites within the tank farm fence.	The 2002 version of the IC Plan includes this change.	IC Plan revision is scheduled for completion in January 2003.
6. Verify that the area of CPP-26 outside the tank farm fence is a No Further Action (NFA) site.	This has been verified through a review of the Proposed Plan and the WAG 3 OU 3-13 ROD.	Complete July 2002.

Table 3. (continued).

Agency Action Items	Corrective Actions	Status
7. Reconsider if IC monitoring requires inspection of work orders and training records. Resolve this issue prior to revising the IC Plan.	TBD by DOE and the Agencies.	IC Plan revision incorporated wording agreed to in conference call on 11/22/02. The revised wording in the IC Plan eliminates the requirement to review work orders and training records on an annual basis. The revision identifies that the agencies, at their discretion, may request these records for review as part of the institutional control inspection.
8. Ensure consistent management of ICs between CERCLA sites at INEEL. Work with INEEL Long-Term Stewardship Program.	A Site-wide IC Plan is currently being developed.	Site-Wide IC Plan is expected to be complete by October 2003.
9. Update warning signs at CPP-58 with new hazard (i.e., nitric acid). Remove old sign.	The signs were updated in August 2002.	Complete August 2002.
10. Explain the presence of stakes marked "CPP-38."	Wooden stake was marked wrong. The markers will be changed to the correct site, i.e., CPP-36.	Complete September 2002.
11. Install markers in old Waste Calcining Facility (WCF) concrete cap to delineate CPP-36.	Epoxy-covered markers will be placed in the cap prior to the 2003 IC monitoring inspections.	Complete July 2002.
12. Check OU 3-13 Remedial Investigation/Feasibility (RI/FS) to determine nature of unacceptable risk for Group 3 site CPP-48.	RI/FS was checked and site was moved to its correct location in August 2002. An acid leaching tank for the WCF was located at this site. The tank was closed under the Resource Conservation and Recovery Act, but was placed into the RI because of residual contamination at this location.	Complete September 2002.
13. Install markers and provide explanation in IC Plan for deviation from plan to place warning signs at all avenues of approach at CPP-41A. Install markers at other sites located under concrete.	The 2002 version of the IC Plan includes this change.	IC Plan revision is scheduled for completion in January 2003.

Table 3. (continued).

Agency Action Items	Corrective Actions	Status
14. Install warning signs and markers at CPP-37C.	The site will be surveyed and the signs will be installed.	Scheduled for surveying and signage installation in January 2003.
15. Repair deficiencies at wells USGS-50, MW-17, USGS-49, MW-1, USGS-121.	An ICARE notice on the Bechtel BWXT Idaho (BBWI) wells has been submitted. DOE will work with the U.S. Geological Survey (USGS) to develop a well inspection protocol for the USGS wells.	ICARE # 27977 has been submitted; corrective action dates are not yet set for completion of this item.
16. Add warning sign for CPP-06 on signpost for CPP-09 to show location of Site CPP-06 that is under the asphalt road within the boundaries of CPP-09. Provide explanation in IC Plan for deviation from plan to mark boundaries of NFA sites.	CPP-06 has been added to the existing signs for CPP-09. The 2002 version of the IC Plan includes a discussion about the deviation for marking NFA sites.	Complete September 2002.
17. Make permanent change to CPP-04 and CPP-05 warning signs that were corrected with a permanent marker pen.	These changes were made in September 2002.	Complete September 2002.
18. Add footnote to NFA inspection checklist that CPP-88 boundary is marked by the INTEC fence.	The updated IC Plan includes this change.	Completion expected prior to 2003 IC monitoring inspections.
19. Determine USGS method of abandonment for Well LF3-11.	TBD by DOE and the Agencies.	Completion expected prior to 2003 IC monitoring inspections.
20. Review work orders and training records selected by Agencies.	This action is in progress by the Agencies.	Completion expected prior to 2003 IC monitoring inspections.
21. Look at preliminary draft Notice of Disturbance Process write-up and clarify approach to managing disturbed contaminated soil (i.e., backfill excavation with contaminated soil vs. replacing with clean fill).	The approach and wording have been clarified in the NOD Agency Approval Form.	Complete September 2002.

3. REFERENCES

- DOE-ID, 1996, *INEL Comprehensive Facility and Land Use Plan*, DOE/ID-10514, Rev. 0, Department of Energy Idaho Operations Office, March 1996.
- DOE-ID, 1999, *Final Record of Decision Idaho Nuclear Technology and Engineering Center*, DOE/ID-10660, Rev. 0, Department of Energy Idaho Operations Office, Environmental Protection Agency, and Idaho Department of Health and Welfare, October 1999.
- DOE-ID, 2001, *Institutional Control Plan for the Idaho Nuclear Technology and Engineering Center, Waste Area Group 3, Operable Unit 3-13*, DOE/ID-10729, Rev. 1, Department of Energy Idaho Operations Office, Environmental Protection Agency, and Idaho Department of Health and Welfare, March 2001.
- DOE-ID, 2003, *Institutional Control Plan for the Idaho Nuclear Technology and Engineering Center, Waste Area Group 3, Operable Unit 3-13*, DOE/ID-10729, Rev. 3, Department of Energy Idaho Operations Office, Environmental Protection Agency, and Idaho Department of Health and Welfare, January 2003.

Appendix A
Institutional Controls Field Inspection Checklists

2002 IC Monitoring Report
WAG 3, OU 3-13 BBWI Internal Inspection Checklists
May 2002

WAG 3, OU 3-13 INSTITUTIONAL CONTROL FIELD INSPECTION CHECKLIST

DATE (S)/TIME (S): 5-8-02 and 5-9-02

INSPECTOR: Lee Tuott BBWI
Name Title Organization

INSPECTOR: Robert Sanders SERG
Name Title Organization

INSPECTOR: _____
Name Title Organization

1. Group Number or NFA Designation: 1
2. Identify security restrictions that would limit or control public trespass:
yes Restricted Security Access to the INEEL
yes Restricted Security Access to INTEC fenced boundary
3. Release sites with land use other than Industrial: NONE
4. Release Site IDs, descriptions, and visual inspection matrix. On the table below please indicate "YES" or "NO" for observations based upon the visual inspection. If actions have been taken associated with remediation, site changes, or changes in land-use, take photographs and fill out the "Site Inspection Photo Number Log" for the annual report. Sign location specifications are provided in the ICP. Deficiencies should be addressed in No. 7.

Release Site	Description	Status of Remedial Action	Evidence of Human Intrusion	Observed* Boundary Monuments	Observed* Warning Signs/Barriers
CPP-15	Solvent burner E. of CPP-605	Pre-Design	NO	yes	yes
CPP-16	Contaminated soil from leak in line from CPP WM-181 to PEW Evaporator	Pre-Design	NO	yes	yes
CPP-20	CPP-604 Radioactive Waste Handling Area	Pre-Design	NO	yes	yes
CPP-24	CPP Tank Farm Area bucket spill	Pre-Design	NO	yes	yes
CPP-25	Contaminated soil in the Tank Farm area N of CPP-604	Pre-Design	NO	yes	yes
CPP-26	Contaminated Soil in the Tank Farm Area from Steam Flushing	Pre-Design	NO	yes	yes
CPP-27	Contaminated soil in the Tank Farm Area E of CPP-604	Pre-Design	NO	yes	yes
CPP-28	Contaminated soil in Tank Farm Area S of WM-181 near VB A-6	Pre-Design	NO	yes	yes

* - For Group 1, Boundary Monuments and signs are located on the perimeter fence around the Tank Farm Area

<i>Release Site</i>	<i>Description</i>	<i>Status of Remedial Action</i>	<i>Evidence of Human Intrusion</i>	<i>Observed Boundary Monuments</i>	<i>Observed Warning Signs/Barriers</i>
CPP-30	Contaminated soil in the Tank Farm Area near valve box B-9	Pre-Design	NO	yes	yes
CPP-31	Contaminated soil in Tank Farm Area S of tank WM-183	Pre-Design	NO	yes	yes
CPP-32	Contaminated soils in Tank Farm Area SW & NW of VB B-4	Pre-Design	NO	yes	yes
CPP-33	Contaminated soils in Tank Farm Area near WL-102 NE of CPP-604	Pre-Design	NO	yes	yes
CPP-58	CPP PEW Evaporator overhead pipe spills	Pre-Design	NO	NO-see # 7	yes
CPP-79	Tank Farm release near VB A-2	Pre-Design	NO	yes	yes
CPP-96	Tank Farm Interstitial Soils	Pre-Design	yes	yes	yes

5. Institutional Controls records review. On the table below, please indicate "YES", "NO", or "NA" for records reviewed during the inspection. Answers of "NA" indicate that the records, such as work permits or personnel training records, were not applicable at the time of the inspection (i.e., release site not accessed for work purposes).

<i>Release Site</i>	<i>CFLUP Review</i>		<i>Observed Work Permit(s)/RWPs</i>	<i>Observed Personnel Training Records</i>	<i>Observed NOD(s)</i>	<i>Observed Notices to Affected Stakeholders</i>
	<i>Observed Surveyed Maps</i>	<i>Listing of Required ICs</i>				
CPP-15	See # 7					
CPP-16						
CPP-20						
CPP-24						
CPP-25						
CPP-26					yes	
CPP-27						
CPP-28						
CPP-30						
CPP-31						
CPP-32						
CPP-33						
CPP-58						
CPP-79						

Release Site	CFLUP Review		Observed Work Permit(s)/RWP(s)	Observed Personnel Training Records	Observed NOD(s)	Observed Notices to Affected Stakeholders
	Observed Surveyed Maps	Listing of Required ICs				
CPP-96					yes	

6. Listing of Work Permits/RWPs/NODs.^a Deficiencies should be addressed in No. 7

Standard 101 Work Permits	Radiological Work Permits	Notices of Disturbance
N/A	N/A	INTEC-04-3-13-D01-05
		INTEC-04-3-13-D01-05

DEFICIENCIES:

7. Provide a description of any deficiencies and what efforts or measures have been or will be taken to correct problems:

CPP-58 - This site is being resurveyed due to additional contamination found. New signs also need put up after the survey is complete.

CFLUP Review - The review of the CFLUP was not possible due to Homeland Security issues. This document may not be available to the public in its present format.

IMPROVEMENTS:

8. Describe any additional IC requirements that may be necessary due to unique circumstances observed during the visual inspection:

^a Agency inspectors may assess a random sampling of this information to determine if there are any deficiencies.

WAG 3, OU 3-13 INSTITUTIONAL CONTROL FIELD INSPECTION CHECKLIST

DATE (S)/TIME (S): 5-8-02

INSPECTOR: Lee Tuott BBWI
Name Title Organization

INSPECTOR: Robert Sanders BERG
Name Title Organization

INSPECTOR: _____
Name Title Organization

1. Group Number or NFA Designation: 2
2. Identify security restrictions that would limit or control public trespass:
yes Restricted Security Access to the INEEL
yes Restricted Security Access to INTEC fenced boundary
3. Release sites with land use other than Industrial: NONE
4. Release Site IDs, descriptions, and visual inspection matrix. On the table below please indicate "YES" or "NO" for observations based upon the visual inspection. If actions have been taken associated with remediation, site changes, or changes in land-use, take photographs and fill out the "Site Inspection Photo Number Log" for the annual report. Sign location specifications are provided in the ICP. Deficiencies should be addressed in No. 8.

Release Site	Description	Evidence of Human Intrusion	Observed Boundary Monuments	Observed Warning Signs/Barriers
CPP-02	Floor Drain W of CPP-603	NO	yes	yes
CPP-41A	Fire Training Pits CPP-666 and CPP-663	NO	yes	yes - also see #8
CPP-60	Paint Shop at CPP-645	NO	yes	yes
CPP-68	Abandoned gasoline tank CPP VES-UTI-652	NO	see #8	yes
CPP-80	CPP-601 Vent Tunnel drain leak	NO	yes	yes
CPP-85	WCF Blower Corridor	NO	yes	yes
CPP-86	CPP-602 Waste Trench Sump	NO	yes	yes
CPP-87	CPP-604 VOG Blower cell sump and floor drain	NO	yes	yes

Release Site	Description	Evidence of Human Intrusion	Observed Boundary Monuments	Observed Warning Signs/Barriers
CPP-89	CPP-604/605 tunnel excavation	NO	yes	yes

5. Institutional Controls records review. On the table below, please indicate "YES", "NO", or "NA" for records reviewed during the inspection. Answers of "NA" indicate that the records, such as work permits or personnel training records, were not applicable at the time of the inspection (i.e., release site not accessed for work purposes).

Release Site	CFLUP Review		Observed Work Permit(s)/RW Ps	Observed Personnel Training Records	Observed NOD(s)	Observed Notices to Affected Stakeholders
	Observed Surveyed Maps	Listing of Required ICs				
CPP-02	See #7 on Group 1 sheet					
CPP-41A						
CPP-60						
CPP-68						
CPP-80						
CPP-85						
CPP-86						
CPP-87						
CPP-89						

6. Provide the current status of any remedial actions at the release sites (i.e., a detailed description of the project's status based on the flowchart from Figure 3-1, Operable Unit 3-13 Group 2 Closure Evaluation Criteria and Checklist).

Release Site	Description
CPP-02	Pre D&D/Sta RDA
CPP-41A	
CPP-60	
CPP-68	
CPP-80	
CPP-85	
CPP-86	

Release Site	Description
CPP-87	
CPP-89	

7. Listing of Work Permits/RWPs/NODs.^b Deficiencies should be addressed in No. 8.

Standard 101 Work Permits	Radiological Work Permits	Notices of Disturbance

DEFICIENCIES:

8. Provide a description of any deficiencies and what efforts or measures have been or will be taken to correct problems:

CPP-41A - One sign was missing and sign near the door to 1683 needs to be replaced.

CPP-68 - Looks like the survey boundary markers have been covered with road asphalt

CPP-41-A - Survey markers for 2 corners of the site away from the Building 1683 - in the lay-down areas could not be located during the Agency inspection on 6-19-02 - R 6-19-02

^b Agency inspectors may assess a random sampling of this information to determine if there are any deficiencies.

IMPROVEMENTS:

9. Describe any additional IC requirements that may be necessary due to unique circumstances observed during the visual inspection: _____

I certify that the above inspection report is true and accurate to the best of my ability.

Joe T. [Signature] 7-10-02
Inspector signature Date

R. Sanders 5-8-02
Inspector signature Date

Inspector signature Date

WAG 3, OU 3-13 INSTITUTIONAL CONTROL FIELD INSPECTION CHECKLIST

DATE (S)/TIME (S): 5-8-02 and 5-9-02

INSPECTOR: Lee Tuott BBWI
Name Title Organization

INSPECTOR: Robert Sanders SERG
Name Title Organization

INSPECTOR: _____
Name Title Organization

1. Group Number or NFA Designation: 3
2. Identify security restrictions that would limit or control public trespass:
yes Restricted Security Access to the INEEL
yes Restricted Security Access to INTEC fenced boundary
3. Release sites with land use other than Industrial: none
4. Release Site IDs, descriptions, and visual inspection matrix. On the table below please indicate "YES" or "NO" for observations based upon the visual inspection. If actions have been taken associated with remediation, site changes, or changes in land-use, take photographs and fill out the "Site Inspection Photo Number Log" for the annual report. Sign location specifications are provided in the ICP. Deficiencies should be addressed in No. 8.

<i>Release Site</i>	<i>Description</i>	<i>Status of Remedial Action</i>	<i>Evidence of Human Intrusion</i>	<i>Observed Boundary Monuments</i>	<i>Observed Warning Signs/Barriers</i>
CPP-01	Concrete settling basin E of CPP-603	Pre-Design	NO	yes	yes
CPP-03	Temporary Storage Area SE of CPP-603	Pre-Design	NO	yes	yes
CPP-04	Contaminated Soil Area near CPP-603 Settling Tank	Pre-Design	NO	yes	yes
CPP-05	Contaminated Soil Area near CPP-603 Settling Basin	Pre-Design	NO	yes	yes
CPP-08	CPP-603 basin filter line failure	Pre-Design	NO	yes	yes
CPP-09	Soil contamination NE corner of CPP-603 SB	Pre-Design	NO	yes - see # 7	yes
CPP-10	CPP-603 plastic pipe break	Pre-Design	NO	yes	yes
CPP-11	CPP-603 sludge and water release	Pre-Design	NO	yes	yes
CPP-13	Pressurization of solid storage cyclone NE of CPP-603	Pre-Design	NO	yes	yes
CPP-14	Old Sewer Treatment Plant W of CPP-604	Pre-Design	NO	yes - see # 7	yes

Release Site	Description	Status of Remedial Action	Evidence of Human Intrusion	Observed Boundary Monuments	Observed Warning Signs/Barriers
CPP-19	CPP-603 to CPP-604 line leak	Pre-Design	NO	yes	yes
CPP-34*	Soil storage area (disposed trenches) in the northeast corner of the ICPP	Pre-Design	NO	yes	yes
CPP-35	CPP-633 decontamination spill	Pre-Design	NO	yes	yes
CPP-36	Transfer Line leak from CPP-633 to WL-102	Pre-Design	NO	yes - See #7	yes
CPP-37A/B	Gravel Pits and Debris Landfill in/out of INTEC	Pre-Design	NO	see #7	yes
CPP-44	Grease Pit S of CPP-608	Pre-Design	NO	yes	yes
CPP-48	French Drain S of CPP-633 see #8	Pre-Design	NO	yes	yes
CPP-55	Mercury contamination area S of CPP-t-15	Pre-Design	NO	yes	yes - see #7 & 8
CPP-67	CPP Perc Ponds #1 and #2	Pre-Design	NO	yes	yes
CPP-91	CPP-633 blower pit drain	Pre-Design	NO	yes	yes
CPP-92	Soil boxes W of CPP-1617	Pre-Design	NO	yes	yes
CPP-93	Simulated calcine disposal	Pre-Design	NO	yes	yes
CPP-97	Tank Farm soil stockpiles	Pre-Design	NO	yes	yes
CPP-98	Tank Farm shoring boxes	Pre-Design	NO	yes	yes
CPP-99	Boxed soil	Pre-Design	NO	yes	yes

5. Institutional Controls records review. On the table below, please indicate "YES", "NO", or "NA" for records reviewed during the inspection. Answers of "NA" indicate that the records, such as work permits or personnel training records, were not applicable at the time of the inspection (i.e., release site not accessed for work purposes).

Release Site	CFLUP Review		Observed Work Permit(s)/RWPs	Observed Personnel Training Records	Observed NOD(s)	Observed Notices to Affected Stakeholders
	Observed Surveyed Maps	Listing of Required ICs				
CPP-01	See #7 on the Group 1 checklist					
CPP-03					yes	
CPP-04						
CPP-05						
CPP-08						
CPP-09						
CPP-10						
CPP-11						
CPP-13						
CPP-14						

* - Metal Posts Mark the surveyed corners

<i>Release Site</i>	<i>CFLUP Review</i>		<i>Observed Work Permit(s)/RWPs</i>	<i>Observed Personnel Training Records</i>	<i>Observed NOD(s)</i>	<i>Observed Notices to Affected Stakeholders</i>
	<i>Observed Surveyed Maps</i>	<i>Listing of Required ICs</i>				
CPP-19						
CPP-34						
CPP-35						
CPP-36						
CPP-37A/B						/
CPP-44						
CPP-48						
CPP-55						
CPP-67						
CPP-91						
CPP-92						
CPP-93						
CPP-97						
CPP-98						
CPP-99						

6. Listing of Work Permits/RWPs/NODs.^c Deficiencies should be addressed in No. 7.

<i>Standard 101 Work Permits</i>	<i>Radiological Work Permits</i>	<i>Notices of Disturbance</i>
Yes	NO	INTEC-043-13-001-03

^c Agency inspectors may assess a random sampling of this information to determine if there are any deficiencies.

DEFICIENCIES:

7. Provide a description of any deficiencies and what efforts or measures have been or will be taken to correct problems:

CPP-SS - sign missing on East side, one fence post was bent over

CPP-09 - Boundary Marker missing on Southeast corner of the site

LT 7-10-02
CPP-37A&B - Needs resurveyed (change in site size) and the sign on NW corner needs a new phone number.

LT 7-10-02
CPP-37C - needs to be resurveyed. This is a new site. LT 7-10-02

CPP-14 - Could not find boundary marker at the East Point between Building 664 & 654 on Cedar Street.

CPP-36 - remark corner (NE) near Building 708

IMPROVEMENTS:

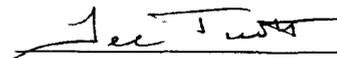
8. Describe any additional IC requirements that may be necessary due to unique circumstances observed during the visual inspection:

CP-SS - Replaced sign on East Side on 5-9-02. Fence Post straightened on 5-12-02

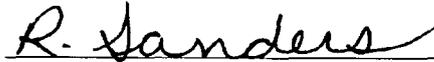
CP-36 Survey markers will be epoxied and placed on the WCF Cap to delineate site boundaries

CPP-4B - This site is not located accurately. The boundary monuments & signage will be relocated following a review of drawings by Site Operations & determination of the correct location. LT 7-10-02

I certify that the above inspection report is true and accurate to the best of my ability.


Inspector signature

7-10-02
Date


Inspector signature

5-9-02
Date

Inspector signature

Date

**WAG 3, OU 3-13 INSTITUTIONAL CONTROL FIELD INSPECTION
CHECKLIST**

DATE (S)/TIME (S): 5-8-02 and 5-9-02

INSPECTOR: Lee Tuott BBWI
Name Title Organization

INSPECTOR: Robert Sanders SERG
Name Title Organization

INSPECTOR: _____
Name Title Organization

- Group Number or NFA Designation: 4
- Identify security restrictions that would limit or control public trespass:
yes Restricted Security Access to the INEEL
yes Restricted Security Access to INTEC fenced boundary
- Release Site ID and Description: CPP-83 - Perched Water System at INTEC CPP 55-06
- Release sites with land use other than Industrial: NONE
- Provide the current status of any remedial actions at the release sites, e.g., remedial design, construction, O&M, etc:

6. Visual inspection matrix. If actions have been taken that would modify or close a monitoring well or respond to a deficiency identified in a previous inspection, take photographs and fill out "The Site Inspection Photo Number Log" for the annual report.

Well ID	Well ID Label Intact and Readable?	Locked?	Abutment Condition	Concrete Pad Condition	Surveyed Location Map Available?	Evidence of Human Intrusion (i.e., unauthorized drilling, unlocked or missing well lock)
CPP-33-1	See #10	yes	OK	OK	yes	NO
CPP-33-2	yes	yes ^{see #10}	OK	OK	yes	NO
CPP-33-3	yes	yes ^{see #10}	OK	OK	yes	NO
CPP-37-4	yes	yes	OK	OK	yes	NO
CPP-55-06	yes	yes	OK	OK	yes	NO
PW-1	yes	yes	NO*	OK	yes	NO

*- PW-1 no abutments, but is inside a metal building

Well ID	Well ID Label Intact and Readable?	Locked?	Abutment Condition	Concrete Pad Condition	Surveyed Location Map Available?	Evidence of Human Intrusion (i.e., unauthorized drilling, unlocked or missing well lock)
PW-2	yes	yes	OK	Poor*	yes	NO
PW-3	yes	yes	OK	OK	yes	NO
PW-4	yes	yes	OK	Poor*	yes	NO
PW-5	yes	yes	OK	OK	yes	NO
PW-6	yes	yes	OK	OK	yes	NO
MW-1	yes - NO - TAPE coming off	yes	OK	OK	yes	NO
MW-2	yes	yes - not secured	OK	OK	yes	NO
MW-3	yes	yes - not secured	OK	OK	yes	NO
MW-4	yes	yes	OK	OK	yes	NO
MW-5	yes	yes	OK	OK	yes	NO
MW-6	yes	yes	OK	OK	yes	NO
MW-7	yes	yes	OK	OK	yes	NO
MW-8	yes	yes	OK	OK	yes	NO
MW-9	yes	yes	OK	OK	yes	NO
MW-10	yes	yes	OK	OK	yes	NO
MW-11	Under Pavement near spent Fuel Storage area					
MW-12	yes	yes	OK	OK	yes	NO
MW-13	yes	yes - but not secure	OK	OK	yes	NO
MW-14	yes	yes	OK	OK	yes	NO
MW-15	yes	yes	OK	OK	yes	NO
MW-16	yes	yes	OK	OK	yes	NO
MW-17***	yes	yes - but not secure	OK	OK	yes	NO
MW-18	yes	yes	OK	OK	yes	NO
MW-20	yes	yes	OK	OK	yes	NO
USGS-50	yes	yes - NO real	OK	OK**	yes	NO Locky - also see #10 COVER MISSING
CPP-33-4-1	yes	yes	OK	OK	yes	NO
CPP-33-4-2	yes	yes	OK	OK	yes	NO
1236-ICPP-S-132	yes	yes	OK	OK	yes	NO
1385-ICPP-SCI-P-216	yes	yes	OK	OK	yes	NO
1386-ICPP-SCI-P-217	yes	yes	OK	OK	yes	NO
1387-ICPP-SCI-P-218	yes	yes	OK	OK	yes	NO

* - concrete pad is chipping away on top
 ** - See # 10 (this is from Agency inspection on 6-19-02)
 *** MW17 was secure at the time of agency inspection on 6-19-02.
 LT 7-10-02

Well ID	Well ID Label Intact and Readable?	Locked?	Abutment Condition	Concrete Pad Condition	Surveyed Location Map Available?	Evidence of Human Intrusion (i.e., unauthorized drilling, unlocked or missing well lock)
1388-ICPP-SCI-P-219	yes	yes	OK	OK	yes	NO
1389-ICPP-SCI-P-220	yes	yes	OK	OK	yes	NO
1390-ICPP-SCI-P-221	yes	yes	OK	OK	yes	NO
1391-ICPP-SCI-P-222	yes	yes	OK	OK	yes	NO
1392-ICPP-SCI-P-223	yes	yes	OK	OK	yes	NO
1393-ICPP-SCI-P-224	yes	yes	OK	OK	yes	NO
1394-ICPP-SCI-P-225	yes	yes	OK	OK	yes	NO
1395-ICPP-SCI-P-226	yes	yes	OK	OK	yes	NO
1396-ICPP-SCI-P-227	yes	yes	OK	OK	yes	NO
1397-ICPP-SCI-P-228	yes	yes	OK	OK	yes	NO
1398-ICPP-SCI-P-229	yes	yes	OK	cracked	yes	NO
1399-ICPP-MON-A-230	yes	yes	OK	OK	yes	NO
1400-ICPP-SCI-P-247	yes	yes	OK	OK	yes	NO
1401-ICPP-SCI-P-248	yes	yes	OK	OK	yes	NO
1402-ICPP-SCI-P-249	yes	yes	OK	OK	yes	NO
1403-ICPP-SCI-P-250	yes	yes	OK	OK	yes	NO
1404-ICPP-SCI-P-251	yes	yes	OK	OK	yes	NO
1405-ICPP-SCI-P-252	yes	yes	OK	OK	yes	NO

7. Are any non-CERCLA wells operating in the groundwater IC restriction area?

YES NO NA

If YES, describe the wells and what program(s) they operate under. _____

8. Does a DOE-ID Directive exist that restricts drilling into contaminated zones at OU 3-13 or the INEEL?

YES NO

If NO Explain: DOE IS USING the ENVIRONMENTAL Checklist and the NEPA process to restrict drilling into contaminated zones

9. Have required notices been sent to affected stakeholders (if applicable)?

YES NO NA

If NO Explain: _____

DEFICIENCIES:

10. Provide a description of any deficiencies and what efforts or measures have been or will be taken to correct problems: CPP-33-1 - Inside tank farm area, could not see label / CPP-33-2 - Locked but needs the lock welded (easily removed) / CPP-33-3 - Same issue as CPP-33-2 / USGS-50 - Well housing cover was off & laying on the ground.

USGS-50 - Concrete pad cracked, -RS 6-19-02

IMPROVEMENTS:

11. Describe any additional IC requirements that may be necessary due to unique circumstances observed during the visual inspection: An ICARE notice was developed and submitted to the ICARE system SD that the issues found during the inspection would be corrected and documented.
ICARE - # 27977

I certify that the above inspection report is true and accurate to the best of my ability.

[Signature]
Inspector signature

7-10-02
Date

R. Sanders
Inspector signature

5-9-02
Date

Inspector signature

Date

WAG 3, OU 3-13 INSTITUTIONAL CONTROL FIELD INSPECTION CHECKLIST

DATE (S)/TIME (S): 5/9/02

INSPECTOR: Lee Tuott BBWI
Name Title Organization

INSPECTOR: Robert Sanders SERG
Name Title Organization

INSPECTOR: _____
Name Title Organization

1. Group Number or NFA Designation: 5

2. Identify security restrictions that would limit or control public trespass:

yes Restricted Security Access to the INEEL
NO Restricted Security Access to INTEC fenced boundary

3. Release Site ID and Description: CPP-23 CPP Injection Well (MAH-FE-PL-304)

4. Release sites with land use other than Industrial: None

5. Provide the current status of any remedial actions at the release sites, e.g., remedial design, construction, O&M, etc:

6. Visual inspection matrix. If actions have been taken that would modify or close a monitoring well or respond to a deficiency identified in a previous inspection, take photographs and fill out "The Site Inspection Photo Number Log" for the annual report.

Well ID	Well ID Label Intact and Readable?	Locked?	Abutment Condition	Concrete Pad Condition	Surveyed Location Map Available?	Evidence of Human Intrusion (i.e., unauthorized drilling, unlocked or missing well lock)
MW-18	yes	yes	OK	OK	yes	NO
USGS-34	yes	yes	OK	OK	yes	NO
USGS-35	yes	see #10	OK	OK	yes	NO
USGS-36	yes	yes	OK	OK	yes	NO
USGS-37	yes	yes	OK	OK	yes	NO
USGS-38	yes	see #10	OK	OK	yes	NO

Well ID	Well ID Label Intact and Readable?	Locked?	Abutment Condition	Concrete Pad Condition	Surveyed Location Map Available?	Evidence of Human Intrusion (i.e., unauthorized drilling, unlocked or missing well lock)
USGS-39	yes	see #10	OK	OK	yes	NO
USGS-40	yes	yes	OK	OK	yes	inside INTEK
USGS-41	yes	yes	OK	OK	yes	Perimeter
USGS-42	yes	yes	OK	OK	yes	Fence
USGS-43	yes	yes	OK	covered with dirt	yes	NO
USGS-44	yes	yes	OK	OK	yes	NO
USGS-45	yes	yes	OK	OK	yes	NO
USGS-46	see #10	yes	OK	OK	yes	NO
USGS-47	under	Pavement				→
USGS-48	yes	yes	OK	cracked	yes	NO.
USGS-49	yes	yes	ONE post Tipped over	Pad above Ground	yes	NO - Inside INTEK Perimeter Fence
USGS-51	yes	yes	OK	OK	yes	NO - Inside PERC Pond Fence
USGS-52	yes	yes	OK	OK	yes	NO - Inside Perimeter Fence
USGS-57	yes	yes	OK	OK	yes	NO
USGS-59	yes	yes	OK	OK	yes	NO
USGS-67	yes	yes	OK	OK	yes	NO
USGS-77	yes	yes	OK	OK	yes	NO
USGS-82	yes	yes	OK	OK	yes	NO
USGS-84	yes	yes	OK	OK	yes	NO
USGS-85	yes	yes	OK	OK	yes	NO
USGS-111	yes	yes	OK	OK	yes	NO
USGS-112	yes	yes	OK	OK	yes	NO
USGS-113	yes	yes	OK	OK	yes	NO
USGS-114	yes	yes	OK	OK	yes	NO
USGS-115	yes	yes	OK	OK	yes	NO
USGS-116	yes	yes	OK	OK	yes	NO
USGS-121	yes	see #10	OK	OK	yes	NO
USGS-122	yes	yes	OK	OK	yes	NO
USGS-123	yes	yes	OK	OK	yes	NO
LF2-08	yes	yes	OK	Pad OK cracking	yes	NO
LF2-09	yes	yes	OK	Pad cracking	yes	NO
LF2-10	yes	yes	OK	Pad cracking	yes	NO
LF2-11	In middle of old Landfill - not accessible					
LF2-12	yes	NO	OK	OK	yes	NO - see #10

Well ID	Well ID Label Intact and Readable?	Locked?	Abutment Condition	Concrete Pad Condition	Surveyed Location Map Available?	Evidence of Human Intrusion (i.e., unauthorized drilling, unlocked or missing well lock)
LF3-08	yes	SEE #10	OK	OK	yes	NO
LF3-09	yes	yes	OK	OK	yes	NO
LF3-10	yes	yes	OK	OK	yes	NO
LF3-11A	yes	NO	MISSING	OK	yes	NO

7. Are any non-CERCLA wells operating in the groundwater IC restriction area?

YES NO NA

If YES, describe the wells and what program(s) they operate under. _____

8. Does a DOE-ID Directive exist that restricts drilling into contaminated zones at OU 3-13 or the INEEL?

YES NO

If NO Explain: Env. Checklist and NEPA process used to restrict Drilling

9. Have required notices been sent to affected stakeholders (if applicable)?

YES NO NA

If NO Explain: _____

DEFICIENCIES:

10. Provide a description of any deficiencies and what efforts or measures have been or will be taken to correct problems: USGS-34 - USGS-39 - Locked but Hinges could be removed / USGS-46 - Stamped but NO label / USGS-121 - Locked, but top can be removed / LF2-12 - missing abutment post - not Locked / LF3-08 - Locked but cover can be removed / LF3-11 - appears to be abandoned / LF3-11A - TOP could be screwed off * NO Abutment Posts

IMPROVEMENTS:

11. Describe any additional IC requirements that may be necessary due to unique circumstances observed during the visual inspection: ICARE Submitted to track and correct issues associated with Group 5 wells. (ICARE # 27977)

I certify that the above inspection report is true and accurate to the best of my ability.

Joe T. ... 7-10-02
Inspector signature Date

R. Sanders 5-9-02
Inspector signature Date

Inspector signature Date

WAG 3, OU 3-13 INSTITUTIONAL CONTROL FIELD INSPECTION CHECKLIST

DATE (S)/TIME (S): 5-9-02

INSPECTOR: Lee Tuott BBWI
Name Title Organization

INSPECTOR: Robert Sanders SERG
Name Title Organization

INSPECTOR: _____
Name Title Organization

1. Group Number or NFA Designation: 6
2. Identify security restrictions that would limit or control public trespass:
yes Restricted Security Access to the INEEL
NO Restricted Security Access to INTEC fenced boundary
3. Release sites with land use other than Industrial: NONE
4. Release Site IDs, descriptions, and visual inspection matrix. On the table below please indicate "YES" or "NO" for observations based upon the visual inspection. If actions have been taken associated with remediation, site changes, or changes in land-use, take photographs and fill out the "Site Inspection Photo Number Log" for the annual report. Sign location specifications are provided in the ICP. Deficiencies should be addressed in No. 7.

Release Site	Description	Status of Remedial Action	Evidence of Human Intrusion	Observed Boundary Monuments	Observed Warning Signs/Barriers
CPP-84	Buried Gas Cylinders	Pre-Design	NO	NO	yes - see #7
CPP-94	Buried Gas Cylinders	Pre-Design	yes	see #8	

5. Institutional Controls records review. On the table below, please indicate "YES", "NO", or "NA" for records reviewed during the inspection. Answers of "NA" indicate that the records, such as work permits or personnel training records, were not applicable at the time of the inspection (i.e., release site not accessed for work purposes).

Release Site	CFLUP Review		Observed Work Permit(s)/RWPs	Observed Personnel Training Records	Observed NOD(s)	Observed Notices to Affected Stakeholders
	Observed Surveyed Maps	Listing of Required ICs				
CPP-84	see	#7 on the Group 1 checklist				
CPP-94						

Standard 101 Work Permits	Notices of Disturbance

DEFICIENCIES:

7. Provide a description of any deficiencies and what efforts or measures have been or will be taken to correct problems: CPP-84 - NO boundary markers at Fence Posts and signs need a new North Arrow sticker.
- _____
- _____
- _____

IMPROVEMENTS:

8. Describe any additional IC requirements that may be necessary due to unique circumstances observed during the visual inspection: CPP-94 - Removal of buried cylinders is complete. Waiting for Final remedial action close out. Site is posted with warning signs
- _____
- _____

I certify that the above inspection report is true and accurate to the best of my ability.

[Signature] _____ 7-10-02
Inspector signature Date

R. Sanders _____ 5-9-02
Inspector signature Date

Inspector signature Date

^d Agency inspectors may assess a random sampling of this information to determine if there are any deficiencies.

WAG 3, OU 3-13 INSTITUTIONAL CONTROL FIELD INSPECTION CHECKLIST

DATE (S)/TIME (S): 5-7-02

INSPECTOR: Lee Tuott BBWI
Name Title Organization

INSPECTOR: Robert Saunders SERG
Name Title Organization

INSPECTOR: _____
Name Title Organization

1. Group Number or NFA Designation: 7
2. Identify security restrictions that would limit or control public trespass:
yes Restricted Security Access to the INEEL
yes Restricted Security Access to INTEC fenced boundary
3. Release sites with land use other than Industrial: none
4. Release Site IDs, descriptions, and visual inspection matrix. On the table below please indicate "YES" or "NO" for observations based upon the visual inspection. If actions have been taken associated with remediation, site changes, or changes in land-use, take photographs and fill out the "Site Inspection Photo Number Log" for the annual report. Sign location specifications are provided in the ICP. Deficiencies should be addressed in No. 7.

Release Site	Description	Status of Remedial Action	Evidence of Human Intrusion	Observed Boundary Monuments	Observed Warning Signs/Barriers
CPP-69	Abandoned LRWST CPP VES-SFE-20	Pre-Design	NO	yes - Building	yes

5. Institutional Controls records review. On the table below, please indicate "YES", "NO", or "NA" for records reviewed during the inspection. Answers of "NA" indicate that the records, such as work permits or personnel training records, were not applicable at the time of the inspection (i.e., release site not accessed for work purposes).

Release Site	CFLUP Review		Observed Work Permit(s)/RWP s	Observed Personnel Training Records	Observed NOD(s)	Observed Notices to Affected Stakeholders
	Observed Surveyed Maps	Listing of Required ICs				
CPP-69	See #7 on Group 1 checklist					

WAG 3, OU 3-13 INSTITUTIONAL CONTROL FIELD INSPECTION CHECKLIST

DATE (S)/TIME (S): 5-8-02

INSPECTOR: Lee Tuott BBWI
 Name Title Organization

INSPECTOR: Robert Sanders SERG
 Name Title Organization

INSPECTOR: _____
 Name Title Organization

1. Group Number or NFA Designation: NFA
2. Identify security restrictions that would limit or control public trespass:
 _____ Restricted Security Access to the INEEL
 _____ Restricted Security Access to INTEC fenced boundary
3. Release sites with land use other than Industrial: _____
4. Release Site IDs, descriptions, and visual inspection matrix. On the table below please indicate "YES" or "NO" for observations based upon the visual inspection. If actions have been taken associated with remediation, site changes, or changes in land-use, take photographs and fill out the "Site Inspection Photo Number Log" for the annual report. Sign location specifications are provided in the ICP. Deficiencies should be addressed in No. 87

Release Site	Description	Status of Remedial Action	Evidence of Human Intrusion	Observed Boundary Monuments
CPP-06	Trench east of CPP-603 Fuel Storage Basin	5-Year Remedy Review	NO	yes NO #7
CPP-17	Soil storage area south of CPP Peach Bottom Fuel Storage Area	5-Year Remedy Review	NO	yes
CPP-22	Particulate air release south of CPP-603	5-Year Remedy Review	NO	yes
CPP-88	Radiologically contaminated soil	5-Year Remedy Review	yes	yes
CPP-90	CPP-708 ruthenium detection	5-Year Remedy Review	NO	yes
CPP-95	Airborne plume	5-Year Remedy Review	yes	NO-5#7

5. Institutional Controls records review. On the table below, please indicate "YES", "NO", or "NA" for records reviewed during the inspection. Answers of "NA" indicate that the records, such as work permits or personnel training records, were not applicable at the time of the inspection (i.e., release site not accessed for work purposes).

Release Site	CFLUP Review		Observed Work Permit(s)/RWPs	Observed Personnel Training Records	Observed NOD(s)	Observed Notices to Affected Stakeholders
	Observed Surveyed Maps	Listing of Required ICs				
CPP-06	See #7 on the Group 1 checklist					
CPP-17						
CPP-22						
CPP-88						
CPP-90						
CPP-95						

6. Listing of Work Permits/RWPs/NODs.^f Deficiencies should be addressed in No. 7.

Standard 101 Work Permits	Radiological Work Permits	Notices of Disturbance
N/A	N/A	INTEC-043-13-DOI-04
		" DOI-06
		" DOI-emerg. #1
		" DOI-emerg #2
		" DOI-07
N/A	↓	" DOI-08
PWD-01-022	N/A	" DOI-09
N/A		" DOI-10
N/A		" DOI-11
N/A	↓	" DOI-12
PWD-02-033	N/A	#56
N/A	N/A	N/A
N/A	N/A	N/A

DEFICIENCIES:

7 Provide a description of any deficiencies and what efforts or measures have been or will be taken to correct problems: CPP-95 - Due to the shape of the site (Airborne Plume) NO Survey markers, however NOD's are required

^f Agency inspectors may assess a random sampling of this information to determine if there are any deficiencies.

CPP-06 - During the Agency inspection on 6-19-02,
the Boundary markers for this site could not
be found. OK 6-19-02

IMPROVEMENTS:

RA S. Q. Describe any additional IC requirements that may be necessary due to unique
circumstances observed during the visual inspection: _____

I certify that the above inspection report is true and accurate to the best of my ability.

Jim J. [Signature]
Inspector signature

7-10-02
Date

R. Sanders
Inspector signature

5-8-02
Date

Inspector signature

Date

Appendix B
Summary of 2002 Group 4 and Group 5
Well Deficiencies

Appendix B

Summary of 2002 Group 4 and Group 5 Well Deficiencies

The following issues with the Group 4 and Group 5 wells were identified during the preinspection for the June 2002 WAG 3 Institutional Control (IC) Inspection. The preinspection was performed on May 7, 8, 9, and 13, 2002.

Monitoring wells - The IC Plan requires that the wells be reviewed for well security (locking), abutments in place, availability of survey map, and condition of concrete around the wellhead. The following wells were identified as having “issues” with the wellhead:

Observations of Monitoring Wells

Well #	Location	Comment
CPP-33-2	INTEC	Needs further evaluation to assess the level of “secure” needed. Specifically, it appears that a bolt could easily be removed to gain access. Does the bolt need to be tack-welded (as some others are with similar design) to eliminate easy access or is the set-up sufficient?
USGS 50	INTEC	Wellhead cover was not on the well, metal plate on top of the well did not secure the wellhead. Locked plug was not secure. Notified Kent Miller, INTEC Environmental Support, of the condition. Kent reviewed the well and notified DOE-ID; USGS; Leah Street, BBWI; and the Plant Shift Supervisor.
PW-4	S of INTEC	The wellhead cover is locked, but the wellhead is not secure as the cover can be removed without tools.
MW-2	INTEC	The wellhead cover is locked, but the wellhead is not secure as the cover can be removed without tools.
MW-3	INTEC	The wellhead cover is locked, but the wellhead is not secure as the cover can be removed without tools.
MW-13	INTEC	The wellhead cover is locked, but the wellhead is not secure as the cover can be removed without tools.
MW-17	INTEC	The wellhead cover is locked, but the wellhead is not secure as the cover can be removed without tools.
USGS#49	INTEC, between fences	Observed from a distance. Area in vicinity of wellhead pad has “sunk”, leaving the concrete pad considerably above the elevation of the surrounding ground. One abutment is also tipped due to the ground movement. This needs to be evaluated to ensure that there isn’t an issue with potential surface water runoff towards the wellhead.
USGS #46	W of INTEC	There is no identifier for this well other than the “stamped” monument.
USGS-48, PW-2, PW-4, #1399,	Various	The concrete pads for these wells are either spalling (fairly major surface deterioration) or have some major cracks. The well standard calls for a pad sloped away from the wellhead. However, it’s not clear when the condition is such that a pad does not provide adequate protection – or what adequate protection is needed, if any.
USGS-128	SW of INTEC	No barriers
LF-3-11a	SW of INTEC	Well lacks barriers, box, lock
LF 2-12	S of INTEC	Post missing, no box/lock, and note: this “well” is completed in a manner that is different from other monitoring wells.

Appendix C

Agencies' Institutional Controls Field Notes and Minutes from Kick-off and Close-out Meetings

JUNE 19, 2002 WAG 3 INSTITUTIONAL CONTROLS–Field Notes (EPA, IDEQ, and DOE-ID)

CPP-58

- Beech & Olive: Two pins placed w/ red circle
 - Signs not up yet at new boundary end
 - Signs need to be revised w/ new contaminants (nitric acid)
 - Site Hazard: Radionuclides; these need to be updated w/ nitric acid info
 - Contact sign info: only phone #; position replaced for name for contact (“WAG 3 Operations”)
-

CPP-48 Group 3

- Original location is an active dry well
 - Marked area west of originally identified location as guestimate of where site is located
- [Check RI of this site to determine how this was identified as an unacceptable risk]; Lee Tuott indicated this could be an NFA site because contamination was removed
-

CPP-36

- Markers will be epoxied into old WCF cap (site that runs across Olive)
 - Two pins marked CPP-38?
-

CPP-37C

- This is debris site with recently signed New Site ID Form doesn’t have signs yet nor does petro site which has not been resolved
-

CPP-41A

- Pin placed under metal shed not seen at time of inspection

- Pin placed under parking area not seen under truck at time of inspection
 - Pins at NW & NE corner of site were located
 - Warning sign located near NW pin on step handrails
 - We need to note in the IC Plan that one sign for 41A is an exception from plans to have signs placed at "all avenues of approach."
-

USGS-50

- Metal cover and plastic piece on top of well casing can be lifted off well
 - Well pad is cracked; gap at casing
 - Arrow at top of well casing marks survey point
 - Doug Kuhns stated that the cover for the well is on order
-

CPP-04

- Four signs with "and 05" printed with permanent marker; permanent change will be made later
-

MW-17

- Well noted earlier in DOE checklist replaced with new well cover
 - Lee Tuott considers usefulness of having a consistent cover design for wells
-

USGS-49

- Pad eroded underneath such that pad is not touching the ground
-

CPP-06

- Could not be found. Think that pins in road mark the site. One pin was missing and appeared to have been dragged out by a snowplow.

–Decided to add signs for CPP-06 placed on the signposts for CPP-09 because CPP-06 falls within the boundaries of CPP-09.

MW-1

–Well label is beginning to come off

–Kathy Ivy notes brass survey markers placed in concrete base of well and decision is made to place markers at CPP-41A and other sites located under asphalt

CPP-84 gas cylinders

–Survey markers have not been installed since last year’s IC Inspection

USGS-121

–Well cover comes off even with lock installed

MW 3-11 Abandoned Well

–Observed bentonite pellets in well with uncapped standpipe

–LF 3-11A PVC riser unsecured without casing south of abandoned well

–Margie English states that if USGS is abandoning well, we should know how they are doing this

IC Monitoring Report Agency Inspections Kick Off Meeting

Date: June 19, 2002

Attendees:

Margie English-IDEQ
Mark Clough-IDEQ
Kathy Ivy-EPA
Lee Tuott-BBWI
Jim Bruce-BBWI
George Henckel-BBWI
Doug Vandel-BBWI
Dave Trenchak-BBWI
Doug Kuhns-DOE-ID
Bob Sanders-SERG, Inc.
Jonathan Witt-SERG, Inc.

Meeting Minutes and Inspection Notes:

These are the meeting minutes from the Agency (EPA Region 10 and Idaho Department of Environmental Quality (IDEQ)) kick-off meeting for the annual Institutional Control (IC) Monitoring inspections for 2002.

1. Rachael Collins was not able to attend the kick off meeting; she asked that we conduct the meeting without her.
2. A discussion was held on the new security guidance from DOE and the White House.
 - OOU (official use only) documents must be locked up and secured when not in use and shredded when they are no longer needed.
 - Dave Trenchak handed out guidance about how the INEEL will handle this new guidance.
 - OOU documents can be sent to the EPA and State of Idaho; however, they have to handle the documents the same as DOE. EPA and the State of Idaho can make copies, but the document cannot be distributed to the general public. A discussion was held between the State of Idaho and the EPA about the use of the Comprehensive Facilities and Land Use Plan (CFLUP).
 - It was suggested by Kathy Ivy (EPA) that the IC Plan be revised to include the information designated for the CFLUP. It was also noted that an ESD for the WAG 3 Record of Decision (ROD) may need to be developed and approved for this change in the IC plan; however, this is dependent on the final direction from DOE.
 - A discussion was held about what the EPA is doing in light of this new guidance, at other Federal Facilities and DOE sites, and what other WAGs are doing at the INEEL.
 - The State of Idaho had concerns about this guidance (about OOU documents) being too restrictive and not within the scope of the White House memo.

- Dave Trenchak will meet with Carl Robertson (DOE security person) to follow-up on the guidance we will use for the IC Monitoring Reports and IC Plan.
 - Kathy Ivy felt that the intent of stakeholder notifications is only for large items such as the opening of the ICDF.
 - In the interim each site should be looked at on a case-by-case basis for stakeholder notification. The WAG 3 ROD should not be changed until specific guidance comes from EPA HQ, etc.
3. A discussion was held about the deficiencies and the status of corrective actions from the 2001 IC Monitoring Report.
 4. A discussion was held concerning the need for review of certain documents such as training records. Some felt that the yearly review may be excessive and therefore it may not be needed every year. A review of the OU 3–13 ROD indicated that annual IC monitoring inspections are required.
 5. Long-term Stewardship should address some of these issues. EPA would like to know the schedule for development of the Long-term Stewardship Plan.
 - Will WAG 3 ICs be rolled into this plan and if so what is the schedule.
 - The State of Idaho and the EPA would both like to see one IC Plan for the whole INEEL.
 6. The annual agency IC Monitoring inspections were held after lunch.

IC MONITORING REPORT AGENCY INSPECTIONS CLOSE OUT MEETING

DATE: 6-20-2002

ATTENDEES:

Margie English-IDEQ
Kathy Ivy-EPA
Rachael Collins-DOE-ID
Lee Tuott-BBWI
Jim Bruce-BBWI
Bob Sanders-SERG, Inc.
Jonathan Witt-SERG, Inc.

MEETING MINUTES:

The agencies (EPA and IDEQ) held their annual inspection of the Institutional Controls (IC) for the WAG 3 IC Monitoring Report on June 19, 2002. These are the meeting minutes of the close out meeting held on June 20, 2002. These minutes are intended to supplement the agency checklists and identify topics for 2003 IC Plan revision.

- 1) Discussions began on the review of the Notice of Disturbances (NOD) and Work Orders.
 - A discussion was held on the lack of documentation for NOD INTEC-OU3-13-DO1-Emergency #1. Based on this discussion BBWI will gather more information about the process for this type of NOD.
 - Jim Bruce (BBWI) went through the documentation for the West Valley Project (NOD INTEC-OU3-13-DO1-03) in detail. Comments associated with this discussion included:
 - Some items discussing CERCLA should be included under #7 (Environmental) of the Pre-job Briefing Checklist.
 - Check on section of the Radiological Control Pre-job Planning Checklist that includes the final results. The agencies questioned why the final results are on the pre-job checklist.
- 2) Reviewed and discussed the outstanding items from the inspections and meetings.
 - BBWI will check with other DOE sites to interpret the White House security memo and subsequent DOE guidance. EPA will also do an internal check within EPA to determine what the EPA policy will be.
 - New NEPA discussion will be sent to the State of Idaho and EPA for their review prior to finalization of the IC Plan.
 - The INEEL Long-Term Stewardship monitoring well checklist does not include an inspection of USGS wells. This needs to be resolved so that a reliable process for performing an IC monitoring inspection of the WAG 3 monitoring wells can be adopted.

- The Group 1 checklist (item #4) needs to be revised to eliminate the individual columns for sites within the Tank Farm Fence. The checklist should consist of CPP-5, CPP-58, and CPP-96 (CPP-96 will represent the remainder of the Tank Farm sites listed in the checklist).
- Verify that the area of CPP-26 outside the Tank Farm Fence is a NFA site.
- Determine if IC monitoring requires the review of work orders and training records.
- Ensure consistent management of ICs between CERCLA sites at the INEEL. Work with INEEL Long-Term Stewardship Program to resolve this issue.
- Revise the CPP-58 signs to include the new hazardous constituent (Nitric Acid) found at the site. The new signs need to be posted when CPP-58 is surveyed in.
- BBWI will look at putting new survey brass caps on the corners of CPP-41A, away from Building CPP-1683.
- CPP-48 has been moved, BBWI will look in the RI/FS to verify where the site was located in the RI document.
- New survey epoxy caps will be placed on the WCF cap to delineate the size of CPP-36.
- CPP-37C will be added to the lists, surveyed, and signed once the new Site ID Form is approved.
- Explain the presence of stakes marked “CPP-38”.
- All wells that were spot checked during the agency inspection will be noted in their inspection checklists. BBWI should not change the completed internal inspection sheets.
- The concrete pad on USGS 49 is suspended above the ground and should be repaired as quickly as possible. DOE may need to talk with USGS.
- Even though CPP-06 is a NFA Site, a new sign should be put up on the same posts as the signs for CPP-09, (CPP-06 lies within the boundaries of CPP-09).
- Add a footnote to the NFA inspection checklist and document in the IC Plan that the INTEC perimeter fence represents the extent of CPP-88.
- Look as using brass caps in place of pins in asphalt locations.
- Survey markers need to be placed on the four corners of CPP-84. The existing fence will be used to delineate the site.
- A table should be included in the IC Monitoring Report that discusses how the issues from the 2001 IC Monitoring Report were addressed, or not addressed.
- The well top on USGS-121 has rusted away and could be removed even though the lock was locked. The well top should be replaced.

- BBWI will get a cross section of the abandoned well (LF3-11) and a copy of the procedure used for abandonment and send to EPA and IDEQ.
 - The agencies will complete their review of the NODs and work orders.
 - The approach to managing disturbed contaminated soil (i.e., backfilling excavation with contaminated soil vs. replacing with clean fill) needs to be clarified.
- 3) The Preliminary Draft NOD Process was handed out for discussion. Lee Tuott discussed the possibility of revising the NOD Form by adding more information about handling different types of soil disturbances.