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MEMORANDUM

TO: Benito J. Garcia, Chief, HRMB, NMED
THROUGH Neil Weber, Chief, DOE Oversight Bureau, NMED
FROM: Steve Yanicak, LANL POC, DOE Oversight Bureau, NMED
DATE: January 3, 1996
SUBJECT: Review of LANL Proposed Standardized RFI Report for
Potential Release Sites, dated 11/7/95

LANL MSWA 65741/16

The DOE Oversight Bureau (DOE OB) has reviewed and prepared comments on a draft copy of a LANL proposed standardized RFI Report for Potential Release Sites, which was provided to our staff for their comments and suggestions. Staff of this Bureau would like to express to LANL their appreciation for this opportunity to participate in the review process, and particularly the opportunity to comment on the draft document.

The attached recommendations are intended for use by LANL in improving the quality and utility of the final document. The recommendations are those of the DOE OB only, and are not intended to represent the regulatory position of the NMED.

If there are any questions, please contact me (505-672-0448) or Bruce Swanton (505-827-1536) of the DOE Oversight Bureau.

SY:BS:tm

attachment

cc with attachment:

- Neil Weber, Chief, DOE Oversight Bureau, NMED
- Jorg Jansen, Program Manager, LANL ER, MS M992
- Theodore J. Taylor, Program Manager, DOE LAAO, MS A316
- Ivan Trujillo, AIP POC, DOE LAAO, MS A316
- Tracy Glatzmaier, DDEES/ER, MS M992
- File LOOK

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**Review of LANL Proposed Standardized RFI Report dated 11/7/95
Recommended Changes and Additions**

Overall Recommendations

Reviewers often find themselves involved in the simultaneous review of several reports and proposals. The Santa Fe AIP office has developed a concept called the 'summary review' for the review of sites which rank in the bottom half of sites with regard to level of concern. This involves a review limited to an expanded Executive Summary and three maps: a map depicting comprehensively the sample locations and 'hits' of all QA/QC-acceptable data for past work, a second map showing the results of the just-completed work, and a third map depicting the proposed locations for the next phase, if such is being proposed¹.

Within this concept, the executive summary should brief the reviewer on 1) known and reasonably likely site source terms, 2) significant past findings as they do or do not support the accuracy of site presumptions, 3) current findings as they do or do not support the accuracy of site presumptions, 4) objectives of next phase or rationale for NFA, VCA, etc.

The reviewer should be able to reach the necessary comfort level or define his/her objections regarding the extent to which existing data support the conclusions in items 1-3, above, by reading the Executive Summary and reviewing the maps. For this reason it may be most effective to present these maps on successive pages, even though the first and third of the maps belongs to earlier and later sections, respectively, of the report. Where additional information is needed, such as the technical capabilities of screening instrumentation, this information would be available in the appendixes.

The review of sites of greater potential concern would typically involve a review of the entire RFIR; however, even in this case an expanded Executive Summary would provide the reviewer with an overview of sufficient detail to identify for the reviewer the past findings, current findings and proposed further work. For a reviewer engaged in the concurrent review of multiple plans, this kind of up-front briefing could be instrumental in re-familiarizing the reviewer regarding the principal issues of a given site and so enable him/her to pick up a report whose review has been interrupted by other tasks and complete the review without the necessity of re-reading the entire document.

¹Where a SAP is being proposed, the reviewer would also review this section.

In general, non-essential technical information should be relegated to appendices. This reviewer has suggests several topics which could deferred to an appendix in order to enhance the rapid flow of the logic of the RFIR and facilitate an efficient review. Except under unusual circumstances the main body of an RFIR should be limited to no more than ten pages.

1. Executive Summary

What is the meaning of the 'HWA' column in Table ES-1?

Add a summary highlighting key findings in past data, e.g., contaminants previously identified, SALs exceeded, main implications of these findings. Include a statement regarding future site use decisions which have been made or are pending, if any.

Executive summaries are usually too brief to provide a real overview of the past, present, and proposed future activities of the site. See *Overall Recommendations* above.

2. Field Activities (1.3)

It is not clear whether this section is intended to cover narrative descriptions of past RFI activities prior to those being reported on in this RFIR or whether this section is for summarization of activities with respect to the most current phase work which has been performed.

3. Data Sheets (Sheets 1 and 2)

The inclusion of tables 5.1.5-1 through 5.1.7-1 at this location may have been accidental. If not:

Define 'EQL' here rather than waiting until Section 3.3. Why does not some type of analytical limit appear in Table 5.1.7-1? The regulatory reviewer may not understand why UTL is used for inorganics and radionuclides while EQL is used for organics.

NOTE: Whether or not the inclusion of Sheets 1 and 2 at this location is accidental, the comment above regarding UTL vs. EQL stands.

4. Soils (2.2.2)

As with the sampling and analysis plan (Section 5.1.11) it may be wise to describe the depth of the soil/tuff interface across the site in question or to

include an appendix with this information to which both this and Section 5.1.11 could refer.

5. **Background Comparisons (3.2)**

"The results of focused data validation should exclude from consideration for background comparison any contaminant that is identified as an artifact of analytical laboratory or field contamination, analytical interference, or improper analyte identification or quantitation."

This statement is reasonable, but is certain to provoke questions from the regulatory reviewer and will lengthen the review cycle time. This might be avoided by clarifying for the reviewer how and when the missing sample data will be replaced or how it is feasible to reach supportable conclusions without the sample data in question. NOTE: This last possibility is remote, as it is difficult to explain how data which was initially thought necessary but has proven invalid can now somehow be dispensed with.

6. **Specific Results, Conclusions and Recommendations (5.0)**

This reviewer assumes Section 5.0 refers to results of the work done within the scope of the just-completed phase, and that 5.1.3 *Previous Investigations* is to be a summary of data from earlier phase work within the entire history of the site. Are data for past 'hits' not to be presented? It seems not, since no data table examples appear within section 5.1.3. How can the regulatory reviewer evaluate completeness of the sampling scheme whose results are reported in tables 5.1.4-1 through 5.1.6-1 unless maps and data tables are included which summarize past results? The regulatory reviewer must be able to compare past results with current results in order to determine whether data gaps have been filled as well as whether apparent trends in past data were adequately pursued. The map format of Figure 5.1.5-1 is suggested for inclusion of past site data. See *Overall Recommendations*.

7. **Background Comparisons (5.1.5)**

It is confusing that data tables presented after Section 1.3, *Field Activities*, reappear here. Perhaps their earlier placement is accidental.

8. **Map depiction (5.1.5-1)**

It is suggested that MCE values be presented for each site location, otherwise the format for the proposed map is excellent.

9. Screening Assessment (5.1.7.1)

Reiterate 'Multiple Contaminant Evaluation' for 'MCE'.

"Add a column to the table to show the results of the MCE calculations as applicable."

It is not clear how a column for MCE results can be added to tables 5.1.7-1 et seq. since it is likely that different 'cocktails' of multiple contaminants may exist in different samples. Include an example table with an MCE results column. Also, the guidance is unclear regarding what situation makes inclusion of an MCE column 'applicable'. This reviewer suggests that MCEs for each sample site should always be presented.

10. Exposure Assessment (5.1.7.2.2)

Only the summary results of the assessment and an overview of the assessment approach need be in the main report. The details of exposure scenario, pathways and estimation of contaminant intake might be better placed in an appendix. What is meant by the second bullet: 'concentration and location of COPCs in soil'? Is this different than the data presented in Tables 5.1.5-1 et seq.? If this is meant to be the location for the narrative discussion of the tabular data then this should be so stated.

11. Risk and Dose Characterization (5.1.7.2.4)

Re: The second bullet, 'toxicology of the COPCs', this material should be included in an appendix, not in the main report.

12. Extent of Contamination

Suggested change: "Also, the Phase I investigation may have been so reconnaissance in nature, that nature and extent may not have been found.", to the following: "Also, the Phase I investigation may have been limited to reconnaissance in which case nature and extent may not yet have been determined."

13. Sampling and Analysis Plan (5.1.11)

Proposed sample locations This reviewer has proposed (comment 6) that a map depicting sample results obtained preceding the results of the current phase be presented for comparison with Figure 5.1.5-1. If a new round of sampling is being proposed the guidance directs that a map following the format of Figure

5.1.4-1 is to be used for locating proposed sample sites. The reviewer is likely to be comparing these three maps² with each other to determine if trends identified in early work have or are proposed to be followed up on, if boundaries of contaminated areas previously identified have been found, etc. It is suggested that these three maps be presented on successive pages in Section 5.1.4, Field Investigation(s) and that each be shown in the same scale whenever possible. (See *Overall Conclusions*.)

NOTE: NMED/AIP acknowledges and appreciates the inclusion of its recommendations in this section. The clarity and precision of the guidance is improved over that submitted by AIP to LANL/DOE. We hope that this guidance, which was the product of a cooperative AIP/DOE/LANL effort, results in sampling and analysis plans (SAP) which satisfy regulatory as well as technical requirements in future RCRA Facility Investigation Reports.

We appreciate the opportunity to
comment on draft documents.

²Past results, current results and proposed locations for the next round of samples.