

HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU

May 5, 1997

~~CONFIDENTIAL~~

TS 2/19/97

MEMORANDUM:

To: Teri Davis
John Keiling
Kim Hill

From: Dianne Williams Wilburn *DWW*

Re: LANL NOD Database

Please find attached a summary of my meeting with LANL. Please review the information and let me know if you would like to have a meeting. I would also be interested in input about how to proceed from here. Thanks.

ATTACHMENTS

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TC

Summary of Meeting - LANL's NOD Database

General Info

LANL began development of a database to consolidate information concerning NOD's for RFI reports about 18 months ago. The developed database contains information from Jan., 1995, to date. LANL started this database to help bring consistency across Field Units to reports, report content, and response to NOD's.

The format for the database was based on the format of NOD letters sent by EPA. Since NMED is now the AA and since databases change to meet changing needs, the format of the database may change based on how letters are formatted in the future.

Database Info

LANL has a filemaker 3.0 database with approximately 738 records. These records detail 44 letters from EPA and NMED concerning deficiencies in submitted reports.

Attachment I is a print out of the most detailed layout in the database. Attachment II describes each field and some detail about the type of information contained in that field.

Each layout has **NOD Document Title** as the first field. Based on conversation with LANL staff, the information in this field is straight from the subject portion of the NOD letters. Each letter has one file for each comment. For example, if a letter had 3 comments, there would be three records with the same **NOD Document Title** and each record would contain one comment. EPA and NMED Comments are entered in the field **Administrative Authority Comment**. Then the ER Project's comments are entered in the **ER Project's Response** field.

One other field of interest is **Key Issue**. This field contains key words used to identify the topic of the comment in the NOD. A list of all the categories of key issues is included as Attachment III.

Ideas

One idea would be to develop a layout which would count the number of times key issues have been discussed in NOD letters. This would give us an idea as to which items have been discussed most often. I could clone LANL's database, pull the most common key issues and have a file with which we could easily work. (LANL's database is 3.8 megabytes.) The layout could contain fields such as: NOD Document Title, ER Document Title, NOD Date, PRS, AA Comment, ER Project's Response and Key Issue.

Another idea would be to compact the database with some compression software and bring it here and just manipulate it as we narrow our focus.

*D. Jones,
please see if we
can do this*

Future Plans

LANL hopes to give all FUs access to the database. Their plans long term are to provide internet access to the database. There are also ideas about expansion to include more information, such as schedules, tracking of report date submittals, etc. Also discussed was the problem of trying to decide which field to use a link for relational database development: SWMU number, TA number, etc.



NOD Comment Response Database



NOD Document Title: List of Deficiencies, RFI Report For MDA-K, PRSs 33-002 (a, b, c, d, e), Los Alamos **CT Number:** C072
Commenting Organization: EPA **Commentor:** Barbara Driscoll **NOD Date:** 3/13/96 **Date Received:**
Response Date: 5/2/96 **Approval Date:** **Response Due To:** Project Office 4/25/96 **Admin. Auth. 5**

ER Document Title: RFI RPT TA 33: MDA K, PRSs 33-002(a,b,c,d,e) **Document Type:** RFI RPT
Doc Submittal Date: 9/30/95 **Document Number:** 95-3624 **Field Unit:** 3

Comment Category **Comment Category** **Programmatic**
 A Summary B General C Specific D Other Editorial Optional Mandatory No

PRS **Section** 4.1.2.2 **Page Number** **Line**

Administrative Authority Comment

4.1.2.2. Results of Field Screening:
 Paragraph states that tritium "sniffers" were set up in work areas and that no tritium was detected during drilling. The risk analysis indicates that a possible credible exposure pathway is inhalation resulting from tritium flux from the soil. Paragraph 4.1.2.2 should disclose the sensitivity and type of instrument used to monitor for tritium and discuss wind direction and instrument location on the day(s) monitoring/drilling occurred. This should be reported regardless of the DOE allowable effective dose equivalent.

Key Category
 RCRA Facility Investigation Report

Key Issue (Decision Sup Key Is:
 Site-Specific HASP (SSHASP)

ER Project's Response

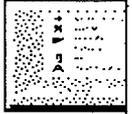
Responder

Sniffer readings do not represent ambient conditions at Material Disposal Area (MDA) K and do not represent the exposure a casual site visitor would receive. The sniffer was used for health and safety purposes only. It was set up inside the core logging trailer whenever personnel were present. Readings were also taken directly at borehole openings during drilling. All boreholes were subsequently capped. Readings above the detection limit for tritium came from air in the trailer or from an outgassing, open borehole. No sniffer data were used to make characterization decisions at MDA K. The sentence should have read, "no tritium was detected above health and safety action levels during drilling operations." Readings were often above 2 µCi/m³, but always below the health and safety action level of 5 µCi/m³ (ICF-Kaiser, 1994, 02-095).
 [a] The tritium sniffer belongs to the LANL Health Physics Measurements Group (ESH-4) and was calibrated by ESH-4 personnel prior to use in the field.
 • Manufacturer: Overhoff, Model: 394-C
 • Detection limit: approximately 2 µCi/m³ tritium
 [b] In the autumn when the drilling took place, the wind direction is typically from the southwest (LANL 1095 1164)

Action



NOD Comment Response Database **HELP**



General NOD Information:

This layout describes each field in the database and serves as a guide for data entry by the user. The ER Project Office will enter the notice of deficiency (NOD) comment information and authors and/or responders will enter NOD response information. Please use the buttons in the main menu for searches and entering responses.

Nod Document Title:

Information in this field is a verbatim copy of the subject line from the Notice of Deficiency (NOD) transmittal letter.

Field Unit:

This field contains the number of the field unit corresponding to the NOD.

NOD Date:

This field contains the date of the NOD.

Response Due:

There are two fields for response due. The first field, Project Office, contains the date that the response is due to the ER Project office for review and processing. The second field, Admin. Auth., contains the date the response is due to the administrative authority. The document must be postmarked no later than this date.

Response Date:

This field contains the date on the NOD response transmittal letter.

Approval Date:

This field contains the date on the letter from the administrative authorities approving the document.

ER Document Title:

This field contains the title of the original document generating the NOD. RFI work plans, RFI reports, guidance documents and cleanup reports, are examples. PRS numbers are included in title.

Document Number: This field contains the LA-UR number of the original document. A sequential number will be assigned to documents that did not receive an LA-UR number. The number is specific to this database.

Commenting Organization:

This field contains the agency title of the administrative authority. EPA, NMED, and DOE are examples of administrative authority agencies that review ER Project documents.

Commentor:

This field will contain the name of the person from the administrative authority that reviewed the document and signed the NOD transmittal letter.

Communication Tracker No.:

This field contains the number issued by the ER Project Office communication tracker system. This number can be used to reference the database maintained by the ER front office.

Comment Specific Information:

Comment Category:

There are two types of NOD comments. The administrative authority lists general comments in the NOD followed by specific ones.

Comment Classification:

NOD comments may be editorial suggestions, optional suggestions, or comments requiring a mandatory response. All NOD comments are considered mandatory except for special cases determined by the Project Office.

PRS:

This field lists PRS numbers specifically referenced in the NOD comment.

Section:

This field lists the section number in the original document specifically referenced in the NOD comment.

Page Number:

This field lists the page number of the original document that is specifically referenced in the NOD comment.

Line:

This field lists the line number on the page of the original document specifically referenced in the NOD comment.

Comment:

Two fields are used for each NOD comment. The first field contains the comment number or designator listed on the NOD. The second field contains a verbatim copy of the NOD comment.

Response:

Two fields are used for NOD responses. The first field contains the comment number or designator listed on the NOD. The second field contains the NOD response. The Field Unit is responsible for entering responses in the the NOD database and notifying reviewers that the responses have been entered.

Key Issues

- 4 additive effects
 - administrative authority (AA)
 - analytical methods
 - Applicable Regulations and Requirements (ARARs) - UST, TSCA, CWA
 - aquifer
 - ash - incinerator
 - Background Data for ER Decisions
 - baseline risk assessment (BRA)
 - best management practice (BMP)
 - cleanup - Acc. Cleanup Final Report
 - cleanup - level
 - cleanup - plan/process
 - cleanup - radionuclide soil
 - cleanup - Stop Work on
 - cleanup - Short Form Site-Specific Health and Safety Plan
 - closure
- 37 contamination - extent
 - contamination - determination of
 - data - additional
 - data - analysis
 - data - analytical
 - data - background
 - data - background after 10/1/96
 - data - environmental surveillance
 - data - non-detects
 - data - raw
 - data - summary table
 - data - tabulation
 - decontamination
 - detection limits > SAL/reportable limits higher than SAL
 - deviation from work plan, SAP, or cleanup plan
 - document formats
 - Document of Understanding (DOU)
 - drainline integrity
 - documents - supporting
 - editorial
 - ecological risk
 - ecological risk assessment (ERA)
- ∅ encounter of groundwater
 - ER and Waste Management Interactions
 - ER Standard Operating Procedures (SOPs)
 - fate and transport
 - field screening
 - figure
 - filtered vs unfiltered water samples
 - Facility for Information Management and Display (FIMAD)
 - further investigation
 - future land use

future land use scenario - industrial
future land use scenario - recreational
future land use scenario - residential
ground water
Health and Safety Plan (HASP)
high explosive (HE)
human health risk
hydrology
Interim Action Plans and Reports
Interim Action Process
Interim Measure
Investigation Derived Waste (IDW)
laboratory - fixed
laboratory - mobile
logs
maximum chemical concentration
maximum concentration limit (MCL)
multiple chemical evaluation (MCE)
no further action (NFA) concurrence
no further action (NFA) deferred
no further action (NFA) non-concurrence
no further action (NFA) criteria
not add to permit
polyaromatic hydrocarbons (PAH)
Permit Modification Request
PID/FID readings
polychlorinated biphenyls (pcb)
preliminary remediation goals (PRG)
Quality Assurance (QA)/Quality Control (QC)
radiation
reportable limits (RPLs) higher than SALs/detection limits > SALs
RFI Report Format
risk assessment
Risk Based Correction Process (RBCAP)
Sample Analysis Plans (SAPs)
sample - composite vs. discrete grab
sample - fill
sample - location
sample - sediment
sample - soil
sample - soil boring
sample - tuff
sample - water
samples returned from analytical laboratories
sampling - confirmation/verification
schedule
screening action level (SAL)
semi-volatile organic compound (SVOC)

Site-Specific HASP (SSHASP)
storage area- satellite/>90 days
springs
surface water runoff
Total Petroleum Hydrocarbons in Soil (TPH)
Toxic Substances Control Act (TSCA)
toxicity characteristic leaching procedure (TCLP)
UCL (upper confidence level)
UTLs (upper tolerance limits)
volatile organic compounds (VOC)
waste acceptance criteria (WAC)
waste characterization
wells - monitoring
wetland
xray fluorescence (XRF)