



Department of Energy

Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

October 25, 2001

U.S. Environmental Protection Agency
Attn: Wayne Pierre
Environmental Cleanup Office
M/S ECL -133
1200 Sixth Avenue
Seattle, WA 98101

SUBJECT: Response to the August 22, 2001, EPA Request for Information Pursuant to Section 104 of CERCLA for WAG 7 of the INEEL -- (EM-ER-01-173)

Dear Mr. Pierre:

This response to your request of August 22, 2001, includes those Government records pertinent to your request in the possession of the Department of Energy (DOE) and BBWI, the Management and Operations contractor for the INEEL, that EPA does not already have. DOE believes that EPA has all the pertinent documents with the exception of financial records. DOE is a party to the Federal Facility Agreement and Consent Order (FFA/CO) for the INEEL. BBWI performs work at the INEEL as directed by DOE. The FFA/CO establishes the schedule under which EPA receives characterization information for WAG 7 and the other remediation work at the INEEL. EPA has all draft and final documents that describe the characterization of the RWMC. Engineering files are being compiled into the draft RI/FS for OU 7-13/14 at this time and will be provided to EPA in March 2002, as called for in FFA/CO schedule. We are providing with this letter summary financial records that may assist EPA in understanding the use of funds in FY 2001.

DOE requested an extension of the deadline to submit our response, which would have allowed us to provide answers within the context of the FY 2002 Federal budget. At this time, DOE is operating under a continuing resolution and does not have a final appropriation.

Below are answers to your questions:

1. Explain in detail Energy's reasons for not taking waste zone core samples in Pit 9 as required under the Stage I Work Plan.
 - (a) Provide all documents generated or received by Energy that relate or refer in any way to waste zone core samples.

DOE-ID has not yet taken waste zone core samples from Pit 9 because we do not yet have a mechanism for taking such samples safely. Initial efforts to develop a system proved costly and time consuming. The Department has not stopped looking for a commercially available system to take core samples. BNFL has a 20-year history of coring in the silos used for waste storage

in Great Britain. They have submitted an unsolicited proposal to DOE that calls for 5 coring campaigns. DOE is reviewing the proposal.

At the same time INEEL was working on a design of a coring system, it developed methods to probe Pit 9 and the rest of the subsurface disposal area. To date, 339 probes have been placed in the SDA.

2. Explain in detail Energy's reasons for not performing the Stage II RA Work Plan for Pit 9.

(a) Provide all documents generated or received by Energy that relate or refer in any way to performance of the Stage II RA Work Plan.

DOE believes it has performed within the spirit of the Stage II RA Work Plan and, whenever possible, within the letter of the RA Work Plan. Since no coring system was available during Stage I, DOE has not taken physical samples from Pit 9 that would confirm probing data at the selected retrieval location. Nevertheless, the location selected has been approved by all parties to the FFA/CO.

3. Explain in detail Energy's reasons for not performing the In-Situ Vitrification "hot test" as required under the OU 7-13/14 RI/FS Work Plan.

(a) Provide all documents generated or received by Energy that relate or refer in any way to the in-situ vitrification "hot test."

DOE sent a letter to EPA Region 10 on August 27, 2001, stating our reasons for removing the requirement for an in-situ vitrification "hot test" from the work plan. We received a reply from EPA on September 5, 2001. To restate our concerns, while in-situ vitrification provides an exceptionally durable final waste form, the release of gas to the environment and the consistent occurrence of surface eruptions when the technology has been used make it unsuitable for the remediation of the SDA. The potential eruption of molten radioactive material at the surface of the SDA would be technically manageable but would not be acceptable to the public. For this reason, two of the principle decision makers for the OU 7-13/14 ROD (Beverly Cook, Manager of the Idaho Operations Office and Stephen Allred, Director IDEQ) stated that they would not approve a ROD that included in-situ vitrification. Since the decision makers will not approve the alternative, it is imprudent to continue to invest in this alternative. Sufficient data are available to provide relative cost estimates and risk reduction information required for the RI/FS.

4. Explain in detail Energy's reason for not performing the Ex-Situ Treatability Study as required under the OU 7-13/14 RI/FS Work Plan.

(a) Provide all documents generated or received by Energy since October 1997 that relate or refer in any way to the Ex-Situ Treatability Study.

DOE will not have material to test for the appropriate ranges of characteristics until it is able to retrieve material from the SDA. It is not an efficient use of funds to perform treatability studies on simulated mixtures. After material has been retrieved, ex-situ treatability studies may be appropriate.

5. Explain in detail Energy's reasons for not performing any other activity required under the approved Work Plans for the Radioactive Waste Management Complex, Subsurface Disposal Area.
 - (a) Provide all documents generated or received by Energy since the date of approval of any pertinent Work Plan that relates or refers in any way to a required activity that will not be performed.

DOE intends to meet the deadline for delivery of the OU 7-13/14 RI/FS in March 2002. The RI/FS will meet EPA requirements and guidance for a RI/FS. DOE provided EPA with the draft Second Addendum to the OU 7-13/14 Work Plan in January 2001. DOE has been following this focused approach to address all data quality objectives using available technology. Independent reviews have repeatedly affirmed that the focused approach being taken by DOE will provide adequate information to meet all the data quality objectives for the RI/FS. Data supplied by the OU 7-10 retrieval or core samples are not available, at this time.

On the positive side, data not considered in the original Work Plan are also being used. For example, Rocky Flats' trailer records, used to confirm disposal records, were not available when the Work Plan was written and the type B probes were not available when the Work Plan was written. Basic EPA guidance is to provide enough available information to allow decision makers to make a risk appropriate decision. DOE believes that the data collected will meet EPA's guidance.

Sincerely,



Kathleen E. Hain, Director
Environmental Restoration

Enclosure

cc: Dean Nygard, IDEQ