

Letter for Electronic Distribution

Original signed letter on file at the following address

Nevada Division of Environmental Protection
Bureau of Federal Facilities
333 West Nye Lane
Carson City, Nevada 8976-0851

September 15, 2000

Ms. Runore C. Wycoff, Director
Environmental Restoration Division
U.S. Department of Energy
Nevada Operations Office
P.O. Box 98518
Las Vegas, Nevada 89193-8518

RE: Review of Addendum to the Corrective Action Investigation Plan for Corrective Action Unit 98, Frenchman Flat, Revision 1

Dear Ms. Wycoff:

The Addendum to the Corrective Action Investigation for Corrective Action Unit (CAU) 98, Frenchman Flat (Addendum), dated April 2000, has been reviewed by the Nevada Division of Environmental Protection (NDEP). In accordance with Subpart XII.8.b of the Federal Facility Agreement and Consent Order, the Addendum is hereby Disapproved with comments.

NDEP provided the Department of Energy (DOE) with comments on the Draft copy of the referenced Addendum in March 2000 which identified deficiencies in the document. These comments originated from previously documented NDEP concerns and comments contained in a DOE Peer Review Group (PRG) document regarding the lack of Frenchman Flat Corrective Action Unit (FF-CAU)-specific data. The expectation was that the work proposed in the Addendum would be directed toward addressing the concerns expressed by the NDEP which incorporated those of the PRG.

The April 2000 Final Addendum did not address these concerns. Section 5.3.2 briefly touched on these issues, however, the Addendum fails to make a direct connection between NDEP's identified deficiencies, the work being proposed by DOE, and the degree to which the identified deficiencies will be addressed by the proposed work.

It is still not possible for NDEP to comment, in a worthwhile manner on the adequacy of the proposed work to address the deficiencies identified by NDEP in the letter of March 9, 2000.

It is noted that the Addendum proposed the drilling of 2 wells, and in fact one of these wells has already been drilled. NDEP has previously concurred with the need for and the drilling locations proposed for these wells. However, it is impossible to determine if the criteria established for these wells (e.g. total depth, tests to be performed, parameters to be measured) meet the data needs identified by NDEP and the PRG. The revised Addendum must thoroughly discuss and address these details and the other comments contained in NDEP's March 9, 2000 letter.

DOE is required to propose a Milestone date for NDEP receipt of a revised Addendum by Close of Business (COB) on October 15, 2000.

Questions regarding this matter may be addressed to C. Goewert at (702) 486-2865, S. Jaunarajs at (775) 687-4670 Ex. 3030, or me at (775) 687-4670 Ex. 3039.

Sincerely,

Paul Liebendorfer, P.E.
Chief
Bureau of Federal Facilities

PJL/KKB/js

cc: Dave Bedsun, DTRA
Ken Hoar, DOE/EPD
Patti Hall, DOE/ERD
Frank Di Sanza, DOE/MWMD
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