

Boeing Comments on Technical Memorandum Subarea HSA 7, 3 and NBZ

Page, Section	Comment
General Comment	There are numerous instances of repetitive text throughout the document. It is suggested that general historical material and/or interviewee recollections regarding RMHF as a whole could be presented once only, while material specific to individual buildings are could be discussed in the individual building sections.
Page vii	Change “demolition” to “decommissioning”
Page viii	Change “Megawatts per day” to “Megawatt days”
Page 2, Section 1.0	<p>Add the following sentence at the end of the last paragraph of section 1.0.</p> <p><i>“However, on May 5, 2011, SB 990 was declared “invalid and unconstitutional in its entirety” by the United States District Court (Central District of California). The Court also “enjoined [the DTSC] from enforcing or implementing SB 990”.”</i></p> <p>Alternatively, suggest deleting all references to SB 990.</p>
Page 3 and Page 12	<p>The whole concept of classifying areas into Class 1, 2 or 3 based on a MARSSIM DCGL_w (page 3) is no longer valid, since the AOC defines the DCGL_w as zero. Thus, Class 2 (< DCGL_w or < 0) and Class 3 (small fraction of DCGL_w or small fraction of zero) are meaningless concepts.</p> <p>EPA has correctly redefined its classification policy based on a high (Class 1), medium (Class 2) or low (Class 3) potential for contamination based on its various lines of inquiry listed on page 12. However, EPA should stop referring to the MARSSIM definition of the classes based on numerical DCGL_ws.</p>
Page 8, Section 1.6	<p>Edit the last sentence of the second paragraph ...</p> <p><i>“Numerous additional information requests have been ongoing and, on December 23, 2010, and January 11, 2010 during the months of December 2010 and January, March, April, May, June, July and August of 2011, Boeing provided numerous additional documents in response to both EPA original information requests and EPA queries of Boeing’s document database for the SSFL.”</i></p>

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Page 29, Footnote 1	Interviewee #254 is probably recounting the incident A-0033 (not A-0070) that did occur at the Hot Lab on November 24, 1964. The same interviewee #254 recollection is repeated in the Group 5D Tech Memo on page 37 for the Hot Lab. Incident A-0033 is also described in full on page 53-54 of the Group 5D Tech Memo for the Hot Lab.
Page 35, Footnote 1	Interviewee #7 references to <i>“building 9 (an open-ended building with only a roof)”</i> are actually references to Bldg 4563 (see Figure 1.3a). <i>“The enclosed building next to Building 9”</i> is actually Building 4075 (see Figure 1.3a). This same interview and footnotes are repeated on page 94. Suggest correcting or eliminating repetition.
Page 43	Edit the following sentence. <i>“... and areas the under-floor the floor drain lines are highly contaminated.”</i>
Page 56, Section 2.2	Some of the narrative in Section 2.2 for Building 4022 is repetitive of material in Section 2.1 for Building 4021. Suggest identifying and deleting repetitive text.
Page 62, Table 2.2	References to “Europium” in Table 2.2, <i>“Chronology of Fuel at RMHF Vault, 176 through 1985”</i> are incorrect. I suspect the original data source referred to EU, meaning “enriched uranium”, not Eu, meaning “europium.”
Page 160, Footnote 3	The incident report A0056 written on November 3, 1976 cannot refer to a February 14, 1978 incident (A0064) which happened in the future. Both reports discuss the contaminated leachfield but discuss different events related to the leachfield. It is true however that we have not located documentation on the original event that caused the leachfield contamination in the early 1960s.
Page 166	Suggest including the results of the Cabrera MARSSIM survey of the RMHF perimeter that included soil sample results for the leachfield area. http://www.etc.energy.gov/library/D&D_page/05-1018.00_Boeing_RMHF_Perimeter_FSSR.pdf