

05-AMRC-0038

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

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Distribution

TRANSMITTAL OF COMMENT RESPONSE MATRIX FOR THE, "RISK ASSESSMENT WORK PLAN FOR THE 100 AREA AND 300 AREA COMPONENT OF THE RCBRA" (DOE/RL-2004-37 DRAFT A)

Thank you for your comments submitted on Draft A of the Risk Assessment Work Plan for the 100 Area and 300 Area Component of the RCBRA (DOE/RL-2004-37, Draft A). Attached is the comment-response matrix for all comments received on the Work Plan. The comments are organized according to the commenting organization or individual. Comments received on the Work Plan, as well as relevant suggestions made during the data quality objectives (DQO) process (interviews, discussions, and workshops), have been incorporated into the revised document as indicated in the comment-response matrix.

The revised Work Plan (DOE/RL-2004-37, Rev. 1) will be printed and distributed upon approval by the regulatory agencies, and will also be posted to the Risk Assessment and Site Closure web site (www.bhi-erc.com/projects/risk/risk.htm).

Thank you for your participation in the 100 Area and 300 Area Component of the River Corridor Baseline Risk Assessment.

Sincerely,

Leif Erickson, Assistant Manager for the River Corridor

James P. Valy on

AMRC:JPS

Attachment

cc w/attach:

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	Consens us Advice #165: Prelimina ry comment s received 8/24/04; final 9/13/04	risk integration	provide an integrated, comprehensive view of risk.	of this project and other risk assessment projects related to the integration of groundwater and source operable units, as well as the integration and alignment of the risk assessments themselves. Based on discussions between the Tri-Parties (DOE, EPA, and Ecology) on September 20, 2004, the DOE has committed to developing a risk assessment integration document for the Hanford Site. This document will demonstrate how and when the alignment of risk assessments will take place. The DOE, EPA, and Ecology will establish the format, content and schedule for preparing this document. The schedule for completing the document will be established by the Tri-Parties by the end of December 2004.
22.	HAB Consens us Advice #165: Prelimina ry comment s received 8/24/04; final 9/13/04	Inclusion of 200 Area Groundwat er	The 100 and 300 Areas RCBRA should consider the arrival of groundwater plumes from the 200 Area.	The 100 Area and 300 Area Component of the RCBRA is evaluating risk from current contaminant concentrations in groundwater beneath the 100 and 300 Areas. Future groundwater contaminant concentrations and flow patterns of groundwater from the 200 Area are being evaluated separately by the Composite Analysis Project. The results of the Composite Analysis will be integrated in the River Corridor Baseline Risk Assessment as those data are available.
23.	HAB Consens us Advice #165: Prelimina ry comment s received 8/24/04; final 9/13/04	Groundwat er	The river corridor risk assessment exposure scenarios should include groundwater consumption in both the 100 and 300 Areas.	Groundwater consumption will be evaluated for both the 100 and 300 Areas. Groundwater exposure pathways are identified in the preliminary conceptual exposure model in Section 3.1.5.2 of the Work Plan.
24.	ODOE (8/24/200 4)	Risk Integration	We strongly recommend that DOE-RL and/or its contractors prepare a brief document (15-20 pages) that clearly articulates how the Columbia River, River Corridor, and Central Plateau Baseline risk assessments will be integrated. The document should be composed of key schedule and geographic boundary graphics demonstrating the comprehensive nature of this multi-year activity. We still lack the information necessary to understand how all the risk assessment work fits together.	See Response to Comment # 21. The Section 1 text describing integration has also been expanded.