MARSSIM Review Comments

| The correct reference is EPA 1997a. A search of the entire document was performed. Twelve pages of the MARSSIM were modified to include the correct reference: 1-3, 2-6, 2-12, 6-4, 9-3, 9-4, 9-7, N-2, N-6, N-8, N-11, and N-13. D | <u>ID</u> 3850 | Category ED-1 | <u>Chapter-Page</u> 2-11 | <u>Date</u> 7/13/98 | <u>Sector</u> PUB | <u>Org</u> PUB | Resolved Yes |
|---|--------------------------|--|---|---|---|--|-------------------------------|
| The correct reference is EPA 1997a. A search of the entire document was performed. Twelve pages of the MARSSIM were modified to include the correct reference: 1-3, 2-6, 2-12, 6-4, 9-3, 9-4, 9-7, N-2, N-6, N-8, N-11, and N-13. D | he referer | nce EPA 1997 is no | ot in the list of references | . This reference a | appears numero | ous times in the MARS | SIM. |
| MARSSIM were modified to include the correct reference: 1-3, 2-6, 2-12, 6-4, 9-3, 9-4, 9-7, N-2, N-6, N-8, N-11, and N-13. D | Resolut | ion: | | | | Resolved Date: | 4/28/00 |
| Resolution: Resolution: The original figure appeared in the EPA QA/G-9 document, Reference EPA 1996a. Figure 2-3 and Figure E-1 were modified to be consistent with Figure 0.2-1 of EPA QA/G-9, which included adding the word "requirements" as suggested. Pages 2-12 and E-2 were modified to resolve this comment. | MARS | | | | • | , , | |
| n Figure 2.3 the word "requirements" should be added to the second bullet in the Data Validation and Verification box so it reads "Verify Measurement Procedures and Reporting Requirements." This also affects Figure E.1 on page E-2. Resolution: Resolved Date: 4/2 The original figure appeared in the EPA QA/G-9 document, Reference EPA 1996a. Figure 2-3 and Figure E-1 were modified to be consistent with Figure 0.2-1 of EPA QA/G-9, which included adding the word "requirements" as suggested. Pages 2-12 and E-2 were modified to resolve this comment. | | | | | | | Resolved Ye : |
| ID Category Chapter-Page Date Sector Org Res | oox so it re E-2. | eads "Verify Measu | | | | also affects Figure E.1 | on page |
| | Resolut The ori | eads "Verify Measu ion: ginal figure appeared to be consistent | rement Procedures and red in the EPA QA/G-9 do with Figure 0.2-1 of EPA | Reporting Require ocument, Reference QA/G-9, which in | ements." This a ce EPA 1996a. I cluded adding | Resolved Date: | on page 4/28/0 :-1 were |
| | Resolut The ori modifies | ion: ginal figure appeared to be consistent sted. Pages 2-12 and | rement Procedures and red in the EPA QA/G-9 do with Figure 0.2-1 of EPA nd E-2 were modified to r | Reporting Require ocument, Reference QA/G-9, which in esolve this comm | ce EPA 1996a. I cluded adding tent. | Resolved Date: Figure 2-3 and Figure Ethe word "requirements | on page 4/28/00 -1 were |

 ReviewComments
 Page 1 of 7
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 ID
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 3849
 TEC-1
 4-36
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 GOV
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 Yes

Section 4.9.2, Table 4.3.

MARSSIM does not explain how the numbers in Table 4.3 were calculated. I have been able to deduce how the numbers were calculated, but I think there may be a mistake in the MARSSIM method used to calculate the values. It appears that the values were calculated using a confidence interval for the true variance based on th chi-squared statistic. However, I can only reproduce the numbers in the table by using values for n samples instead of n-1 degrees of freedom. Furthermore, by using a table of "Factors for Computing One-Sided Confidence Limits for Sigma" from Experimental Statistics, NBS Handbook 91, I can only reproduce the numbers in MARSSIM by using n and not the degrees of freedom as the Handbook requires.

4/28/00 Resolution: Resolved Date: Table 4.3 was revised to provide the correct information. The first column was retitled "Degrees of Freedom" and the incorrect value for 5 degrees of freedom at the 95th level of confidence was corrected to be 4.34. A reference for the source of the information in the table (EPA 1990) was added. An explanation of how degrees of freedom are used to determine the number of measurements from the table was added. Text on pages 4-35, 4-36, 4-37 and 4-38 was modified to reflect the changes to Table 4.3. <u>ID</u> Chapter-Page Category <u>Date</u> <u>Sector</u> <u>Org</u> Resolved 3865 GOV **EPA** ED-1 5-30 4/15/99 Yes Change title of Table 5.3 to indicate this table is used with the Wilcoxon Rank Sum test. 4/28/00 Resolution: Resolved Date: The title of Table 5.3 was changed to "Values of N/2 for Use with the Wilcoxon Rank Sum Test." Page 5-30 and xiii in the table of contents were modified to resolve this comment. Org ID Category Chapter-Page Date Sector Resolved 3845 ED-1 5-33 7/13/98 **PUB PUB** Yes Equation 5-2. Sign P in the denominator should be listed as Sign p. 4/28/00 Resolution: Resolved Date: The typographical error in the equation was corrected. Page 5-33 was modified to resolve this comment. ID Category Chapter-Page Date Sector Orq Resolved 3866 FD-1 4/15/99 GOV **EPA** 5-34 Yes Change title of Table 5.5 to indicate this table is used with the Sign test. 4/28/00 Resolution: Resolved Date: The title of Table 5.5 was changed to "Values of N for Use with the Sign Test." Page 5-34 and xiii in the table of contents were modified to resolve this comment.

<u>ID</u> Category Chapter-Page <u>Date</u> Sector Org Resolved 3853 ED-1 6-10 4/15/99 GOV **EPA** Yes The citation in the last line of the first paragraph in Section 6.4.1 is incorrect. A section should not reference itself. 4/28/00 Resolution: Resolved Date: The correct citation is Section 6.7.1. Page 6-10 was modified to resolve this comment. <u>ID</u> Category Chapter-Page <u>Date</u> Sector Org Resolved 3868 ED-1 6-23 4/15/99 GOV **EPA** Yes Third full paragraph, the reference ANSI 1978 is not in the reference list. It appears to be referring to ANSI 1996b. 4/28/00 Resolution: Resolved Date: The correct reference is ANSI 1996b. A comprehensive search of the MARSSIM was conducted to identify other locations citing this reference, but the reference only appears once in the manual. Page 6-23 was modified to resolve this comment. <u>ID</u> Category Chapter-Page <u>Date</u> <u>Sector</u> Org Resolved 3861 TEC-1 6-33 4/15/99 GOV **EPA** Yes Figure 6.2 shows the background curve with center (mean) 0 and with a sigma squared = B at a spot marked by two lines which appear to be at +/- one sigma of a normal curve. B is the mean of the background counts. HPSR-1 page 6-25 shows the background curve also with mean 0 but it shows a sigma only and does not show sigma squared = B. I think HPSR-1 shows mu sub 0 as the mean background. It shows mu sub 0 at the top of the background distribution where center is 0 on the x-axis. Is this depiction and the labels in Figure 6.2 correct? I do understand the mean at 0, but I do not understand the sigma-squared = B. For a Poisson distribution, does sigma squared equal 2 sigma (meaning sigma equals 2 always) equal the mean background or something? 4/28/00 Resolution: Resolved Date: No modifications were made in response to this comment. Figure 6.2 is correct as it is shown in the December 1997 MARSSIM. It is possible that 0 could be relabelled as B, L_c relabelled as L_c + B, and L_d relabelled as L_d + B to show gross counts instead of net counts, but this relabelling would not make the figure more correct or easier to interpret. ID <u>Org</u> Category Chapter-Page Date Sector Resolved 3854 TEC-1 7-8 **EPA** 4/15/99 GOV Yes Section 7.3.1 should include the recommendation that the action level be communicated to the laboratory. 4/28/00 Resolution: Resolved Date: A recommendation was added to Section 7.3.1 that the information provided to the laboratory specifically include the action level. Page 7-8 was modified to resolve this comment.

3848 TEC-1 7-11 7/13/98 PUB **PUB** Yes Section 7.5. EPA has published a guidance document describing sampling techniques and strategies that could be included in this section (or possibly Appendix M). "Preparation of Soil Sampling Protocols: Sampling techniques and Strategies." EPA/600/R-92/128, Office of Research and Development, July 1992. Resolved Date: 4/28/00 Resolution: A summary of the document was prepared and added to Appendix M. Page M-10 was modified to resolve this comment. ID Category Chapter-Page Date Ora Resolved Sector 3869 ED-1 4/24/00 GOV **EPA** C-21 Yes The list of agreement states needs to be updated. Massachusetts and Ohio have become agreement states and Pennsylvania, Oklahoma, Minnesota, and Wisoconsin are developing agreements with the NRC. 4/28/00 Resolution: Resolved Date: The list of agreement states in Table C.2 was updated to include Massachusetss and Ohio. The text on page C-20 was modified to include a reference to the NRC website for checking on the current list of agreement states and update the date Table C.2 was updated. Pages C-20 and C-21 were modified to resolve this comment. <u>ID</u> Chapter-Page Category <u>Date</u> <u>Sector</u> <u>Orq</u> Resolved 3859 **PUB** TEC-1 D-24 4/15/99 **PUB** Yes I don't think Figure D.7 is correct. First, on page 5-36 the figure is cited as being the risk of not sampling a circular area. It looks like 1 minus the risk. Second, the x-axis is labelled as pi times L squared. On page 3-21 of NUREG-1505 there is a figure with the x-axis given as the radius of a circular area. If I were to square this axis and multiply by pi I should get Figure D.7. Figure D.7 makes no sense to me. 4/28/00 Resolution: Resolved Date: Figure D.7 is correct. Figure D.7 shows the probability of locating a small area of elevated activity. Page 3-21 in NUREG-1505 shows the risk of missing a small area of elevated activity. The text on page D-23 describing Figure D.7 was modified to "The probability of sampling a circular area of size A with either a square or triangular sampling pattern is shown in Figure D.7." <u>ID</u> Chapter-Page Resolved Category <u>Date</u> <u>Sector</u> Org 3855 **EPA** TEC-1 I-5 4/15/99 GOV Yes At the end of Table I.3 include guidance on what to do if there are more than 50 measurement results in the data set. 4/28/00 Resolution: Resolved Date: An equation for calculating the test statistic for sample sizes greater than 50 was added at the end of Table I.3. Page I-5 was modified to resolve this comment.

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<u>ID</u> Category Chapter-Page <u>Date</u> Sector Org Resolved 3847 7/13/98 ED-1 I-30 **PUB PUB** Yes Table I.11 Column 'E'. The equation in Cell E2 should be =IF(B2="R",D2,0), with similar changes in Cells E3 thru E23. This equation needs to be modified for lines 2 through 23 in the table. Resolution: 4/28/00 Resolved Date: The column references in the formula for Column E were modified to refer to Column D. Page I-30 was modified to respond to this comments and comment 3846. <u>ID</u> Chapter-Page Date Sector <u>Org</u> Resolved 3846 ED-1 I-30 7/13/98 **PUB PUB** Yes Third line and Title of I-11. There is no Table 8.7 in the final MARSSIM. This section should refer to Table 8.6. 4/28/00 Resolution: Resolved Date: The typographical error was corrected. Page I-30 was modified to resolve this comment and comment 3847. Page xv in the Table of Contents was modified to reflect the correct title for Table I.11. Chapter-Page <u>ID</u> Category <u>Date</u> <u>Sector</u> Org Resolved 3856 ED-1 L-3 4/15/99 GOV **EPA** Yes This appendix needs to be updated. Phone numbers for EPA Regions I, III, and VIII need to be changed to reflect the new area codes. The address for EPA Region III has changed. Does NRC still maintain an office in Walnut Creek? 4/28/00 Resolution: Resolved Date: Revised telephone numbers and addresses for DOE, EPA, and NRC organizations were located using the Internet. The revised numbers provide general contacts or public relations contacts for each organization rather than an individual's telephone number. The Air Force provided updated telephone numbers and addresses for their contacts. Pages L-2, L-3, L-4, L-5, and L-8 were modified to resolve this comment. <u>ID</u> Category Chapter-Page **Date** Sector Org Resolved 3857 **EPA** ED-1 GL-1 4/15/99 GOV Yes The word "spike"should be added to the glossary and the index. Resolution: Resolved Date: 4/28/00 The MARSSIM Work Group could not identify a consensus definition of the word "spike" to include in the glossary. The interagency work group developing the Multi-Agency Radiation Laboratory Analytical Procedures Manual (MARLAP) is currently working to provide a consensus definition for "spike." To prevent duplication of effort and promote consistency in guidance, the MARLAP definition of "spike" will be included in the MARSSIM glossary after the MARLAP is published.

| <u>ID</u> 3862 | Category ED-1 | <u>Chapter-Page</u> PRE-V | <u>Date</u> 4/15/99 | Sector GOV | <u>Org</u> EPA | Resolved Yes |
|-------------------|--|--|-------------------------------------|-----------------------------------|---|-----------------|
| Section 2. | 5 in the Table of Co | ntents does not match th | ne title of Section | 2.5 on page 2-2 | 25. | |
| Resolu | ıtion: | | | | Resolved Date: | 4/28/0 |
| Page | v of the Table of Co | ntents was modified to a | ccurately reflect t | he text on page | 2-25. | |
| <u>ID</u> | <u>Category</u> | <u>Chapter-Page</u> | <u>Date</u> | <u>Sector</u> | <u>Org</u> | Resolve |
| 8863 | ED-1 | PRE-XXIII | 4/15/99 | GOV | EPA | Ye |
| nclude D | CGL sub W and DC | GL sub EMC in the list of | abbreviations. | | | |
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| | | dentify an error in MARS ation to the MARSSIM us | | | | 0 |
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| 3860 | TEC-1 | PRE-XXVII | 4/15/99 | GOV | NRC | Ye |
| | | able and unit conversion etc. For example, there i | | | | |
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| dpm to | o dps, dpm to pCi, a where the incorrec | the conversion factors list and pCi to dpm. A compr at conversion factors wer , A-2, A-5, A-7, A-11, A-14 | ehensive search e used. Seventee | of the MARSSII en pages were r | M was performed to ide modified to resolve this | • |
| <u>ID</u> | <u>Category</u> | <u>Chapter-Page</u> | <u>Date</u> | <u>Sector</u> | <u>Org</u> | Resolve |
| 864 | ED-1 | RDM-4 | 4/15/99 | GOV | EPA | N |
| | rth line above the bo areas where concer | ox at the bottom of the pa ntrations" | age insert the wor | d "where" so it | becomes "Class 2 area | s are |
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| The se | entence was modificated to resolve this contents | ed as suggested to make | the statement gra | ammatically cor | rect. Page Roadmap-4 | was |

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 Page 6 of 7
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<u>ID</u> Category Chapter-Page <u>Date</u> Sector Org Resolved 3858 ED-1 REF-1 4/15/99 **EPA** GOV No Several references have been updated since the publication of MARSSIM, for example EPA QA/G-5, EPA QA/G-9, and NUREG-1505. 4/28/00 Resolution: Resolved Date: No modifications were made to the manual to resolve this comment. The MARSSIM was prepared using the versions of the reference documents listed in the reference section, and there is no need to update this list. When a revision of MARSSIM is prepared all of the references will be reviewed to determine if more recent versions are available and whether or not the revised references are still consisitent with the guidance in MARSSIM. <u>ID</u> Category Chapter-Page <u>Date</u> <u>Sector</u> <u>Org</u> <u>Resolved</u> 3867 ED-1 REF-3 4/15/99 GOV **EPA** Yes Reference DOE 1991a and 1991b appear to be the same document. DOE 1991a could not be obtained for the list of MARSSIM references. A brief visual inspection of Chapter 6 could not identify where either of these documents are referenced in MARSSIM. Resolution: Resolved Date: 4/28/00 DOE 1991a and 1991b do refer to the same document. The correct reference is shown as DOE 1991a. A

comprehensive search of the WordPerfect version of the manual was conducted and no reference to either DOE 1991a or DOE 1991b was located in the final version of the manual. The reference list was modified to indicate that these two references were deleted. Pages Ref-3 and Ref-4 were modified to resolve this comment.