

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

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March 11, 1996

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ALAMEDA POINT
SSIC NO. 5090.3

Commander
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: George Kikugawa
900 Commodore Drive
San Bruno, California 94066-2402

Dear Mr. Kikugawa:

PRE-DRAFT, RADIATION SURVEY AND FIELD SAMPLING WORKPLAN, NAVAL AIR STATION, ALAMEDA

The California Department of Toxic Substances Control (DTSC) and Department of Health Services, Environmental Management Branch (DHS) have reviewed the pre-draft Radiation Survey and Field Sampling Workplan. Ms. Deirdre Dement, Associate Health Physicist for the DHS performed the review and developed our comments on this document. These comments are enclosed. Please incorporate these comments in the draft Radiation Survey and Field Sampling Workplan.

If you have any questions regarding these comments, please call me at (510) 540-3809 and I will be glad to set up a conference call with Ms. Dement to discuss our comments.

Sincerely,

A handwritten signature in cursive script that reads "Thomas P. Lanphar".

Thomas P. Lanphar
Project Manager
Base Closure Branch

Enclosure

cc: See next page



Mr. Kikugawa
March 11, 1996
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cc. Mr. Gina Kathuria
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

LCDR Mike Petouhoff
Base Environmental Coordinator
Alameda Naval Air Station
Building 1, Code 52
Alameda, California 94501

Mr. James Ricks
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Department of Health Services
Review of Pre-Draft Radiation Survey and Field Sampling Plan,
February 23, 1996, Naval Air Station Alameda, CA

The following comments and questions are in response to the request from Mr. Tom Lanphar of Department of Toxic Substances Control to review the pre-draft radiation survey and field sampling workplan for specific areas of Alameda Naval Air Station located in Alameda, CA.

General Comments:

1. It is not clear to the reviewer that field sampling will occur, even though this is a "radiation survey and field sampling workplan". The only reference to collection of soil samples was found on page 23, section 5.1 under health and safety. What volume of soil is needed for each sample? Is there enough sample to split for comparative analysis with other agencies or for duplicate analysis to be performed for QA/QC verification? Will samples spiked with known quantities of the radionuclides of concern be submitted "blind" to the laboratories performing sample analysis as part of the QA/QC process?

Specific Comments:

1. Page 1, Section 1.1. Will the data be sufficient to adequately assess the degree of contamination and potential hazards related to exposure to radioactive contaminants?

2. Pages 2 and 14, Sections 1.1 and 3.1.1. Why was 18" chosen as the height to take exposure rate measurements?

3. Page 3, Section 1.2.4. How will surface surveying be used to determine the extent of contamination? Are there any plans to take groundwater and soil samples for radiological analysis?

4. Page 5, Section 1.3. If Strontium-90 (Sr-90) is not detected with the surface survey, will there be any further attempt to detect (to confute or affirm) the presence of Sr- 90 with soil or water sampling?

5. Page 14, Section 3.1.6. Why were a minimum of two background locations chosen for each task location? NRC NUREG/CR-5849 recommends 6 to 10 background readings. How will the background measurements be used in the analysis of results (e.g., What statistical tests will utilize the background measurements?)

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Plan, February 23, 1996, Naval Air Station Alameda, CA**

6. Page 22, Section 4.0. Explain how "radiation levels significantly above background" will be determined?

7. Page 27, Section 6.3.1. There is no mention of using a Ra-226 (the radionuclide of concern) source to determine the Ra-226 efficiencies for each instrument and probe. The efficiencies will be needed to convert counts per minute (cpm) to disintegrations per minute (dpm).