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NAVAL SEA SYSTEMS COMMAND DETACHMENT
RADIOLOGICAL AFFAIRS SUPPORT OFFICE (RASO)
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IN REPLY REFER TO:

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RCN: 952290-10
Ser 02/02E **00843**
05 OCT 1995

From: Officer in Charge, Naval Sea Systems Command Detachment,
Radiological Affairs Support Office (RASO)

To: Commander, Engineering Field Activity West, Naval
Facilities Engineering Command (ATTN: Dave Song, Code
1832.3)

Subj: REVIEW OF NAVY RESPONSE TO COMMENTS ON THE SUBSURFACE
RADIATION INVESTIGATION

Ref: (a) Facsimile Transmission NAVFACENCOM EFA West memo
Mr Song of 26 Sep 95
(b) Response to ARC Ecology, California Environmental
Protection Agency, Department of Toxic Substances
Control and Department of Health Services, and U. S.
Environmental Protection Agency Comments on the Results
of the Subsurface Radiation Investigation In Parcels B
and E, Draft Report. CTO 0155

1. As requested in reference (a), NAVSEADET RASO has reviewed
reference (b) and the following recommendations are provided:

a. Change the response to comment 3 of the USEPA to the
following: "The Navy agrees with the EPA in that the effects of
bioturbation should not be underestimated and as such it will be
considered when remedial alternatives are addressed."

b. In the response to comment 1 from (CAL/EPA) DTSC change
the words "non-effected" to "non-impacted" and "effected" to
"impacted".

c. Change the last sentence from the response to comment
number 6 from DHS to read: "Any disagreement with the public health
assessment from the Agency for Toxic Substances and Disease
Registry (ATSDR) should be directed to the Public Health Service
and not to the Navy. However, until there is a validated
alternative to ATSDR's public health assessments the Navy will
abide by their methodology and conclusions."

d. Change the response to comment 20 from DHS to the
following: "If there is such a requirement it will be addressed
during the remedial investigation."

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e. Integrate the definition of background radiation from 10 Code of Federal Regulations, Part 20.1001 to the response to comment 5 from ARC Ecology. It should also be noted that background radiation is not only standard terminology in the radiation protection community, but also it is the standard terminology in the regulations.

2. NAVSEADET RASO point of contact is LCDR L. L. Fragoso or Mr. R. W. Lowman, DSN 953-4692, commercial 804-887-4692.


D. E. FARRAND

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