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Ser 1832.4/L7182
29 May 1997

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering Command
To: U.S. Environmental Protection Agency (Attn: Ms. Claire Trombadore)
California Department of Toxic Substances Control (Attn: Mr. Chein Kao)
California Regional Water Quality Control Board (Attn: Mr. Richard Hiett)
Subj: RESPONSE TO COMMENTS ON THE DRAFT FINAL PHASE III RADIATION INVESTIGATION FIELD WORK PLAN, ENGINEERING FIELD ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA
Encl: (1) Response to Agency Comments on the Draft Final Phase III Radiation Investigation Field Work Plan, dated 15 Oct 1996, Hunters Point Shipyard, Engineering Field Activity, West, Naval Facilities Engineering Command, San Francisco, California

1. Enclosure (1) is forwarded as the Navy's response to Agency comments on the Draft Final Phase III Radiation Investigation Field Work Plan dated 15 October 1996.
2. If you have any questions regarding this enclosure, please contact Ms. Luann Tetirick at (415) 244-2561, FAX (415) 244-2654.

Original signed by:

RICHARD E. POWELL
By direction of
the Commanding Officer

Copies to:

PRC Environmental Management, Inc. (Attn: Mr. James Sickles, w/o encl)
Roy F. Weston, Inc. (Attn: Ms. Karla Brasaemle)
RASO (Attn: Mr. Erik Abkemeier)

Blind copies to:

62.3, 182A, 1832, 1832.4, 09CMN, 09CRG (w/o encl)
62C HPS CSO (Eddie Sarmiento)
Information Repository (3 copies, w/encl)
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Activity File: HPS (aka HPA) (File: L7182LT.DOC) ab

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
COMMENTS ON THE PHASE III RADIATION INVESTIGATION
DRAFT/FINAL FIELD WORK PLAN**

This report presents the Navy's responses to EPA's comments presented in letters to the Navy dated October 3, 1996, and January 2, 1997, on the Phase III radiation investigation draft field work plan. EPA's letter to Ms. Luann Tetirick, of the Navy dated January 2, 1997, states that EPA will accept the Phase III radiation investigation final field work plan dated October 15, 1996, based on the adequacy of the Navy's responses to the October 3, 1996, comments. Radiological information and survey data provided in the draft/final field work plan and these responses to EPA's comments are based on files from the U.S. Naval Radiological Affairs Support Office (RASO) and interviews conducted by the Navy's subcontractor (PRC) with former Naval Radiation Defense Laboratory (NRDL) personnel. RASO provided this information to Engineering Field Activity West; PRC Environmental Management, Inc.; and the appropriate state and federal agencies overseeing work at Hunters Point Shipyard (HPS). Agency comments presented in this report will be incorporated in the draft Phase III radiation investigation report.

SPECIFIC COMMENTS:

Comment on Response to EPA

Comment 1:

EPA Region IX's in-house radiation expert, Mr. Steve Dean, has expressed an interest in possibly obtaining a copy of the data in electronic format. Will this be possible or will it only be available in hard copy?

Response

Little data are available in electronic format from previous Phase I and Phase II radiation investigations at HPS. Some soil gamma spectroscopy data are available in electronic format from the Phase I radiation investigation. Over 70 percent of the data collected during the Phase III radiation investigation are in electronic format, including all analytical data and data collected using the global positioning system (GPS). This data will be available to the Agencies upon request after the completion of the Phase III radiation investigation report. All other data will be available in hard copy.

**Comment on Response to EPA
Comment 4**

This response is insufficient. EPA would like the information requested in the original comment briefly summarized and included in the work plan as documentation. Information derived from the Navy's thorough review should be provided in the work plan as justification for decisions regarding action or no action during Phase III.

Response

No additional surveys were proposed in the phase III radiation investigation field work plan for Buildings 830 and 831 since these buildings were evaluated and released by the Atomic Energy Commission (AEC) as part of terminating the radioactive material licenses issued to HPS. Currently, the sites are owned and operated by the University of California at San Francisco (UCSF).

Additional information concerning operations at Buildings 830 and 831 was obtained recently. On May 5, 1997, Dr. Edward Alpin, the former Director of the Biological and Medical Division of NRDL was interviewed over the telephone by PRC. Dr. Alpin stated that Buildings 830 and 831 were built one year before the disestablishment of the NRDL in 1969. The buildings were used to raise rats, mice, and dogs used in radiological experiments at other NRDL facilities at HPS. Neither building was licensed for radioisotopes, and no experiments were allowed by NRDL in the buildings. Dr. Alpin stated that radioactive isotopes were never used in Buildings 830 and 831. For this reason, no radiation investigations are proposed at these buildings.

**RESPONSES TO CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY (Cal/EPA),
DEPARTMENT OF HEALTH SERVICES (DHS) COMMENTS FORWARDED FROM
DEPARTMENT OF TOXIC SUBSTANCES CONTROL(DTSC) COMMENTS ON THE
PHASE III RADIATION INVESTIGATION
FINAL FIELD WORK PLAN**

This report presents the Navy's responses to the comments from DTSC forwarded to DHS in a letter dated November 15, 1996, on the phase III radiation investigation final field work plan dated October 15, 1996. Radiological information and survey data provided in the final field work plan and these responses to DHS comments are based on files from Radiological Affairs Support Office (RASO). RASO provided this information to Engineering Field Activity West; PRC Environmental Management, Inc.; and the appropriate state and federal agencies overseeing work at Hunters Point Shipyard (HPS). Agency comments presented in this report will be incorporated in draft Phase III radiation investigation report.

GENERAL COMMENTS:

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| Comment 1 | The responses to comments and the changes and additions to the document appear adequate, unless noted below as needing additional clarification or verification. |
| Response | This comment is noted. |
| Comment 2 | Please verify that Hunters Point Shipyard is another name for Hunters Point Annex, and HPA is equivalent to HPS. Both designations were used in the document. |
| Response | The Navy has changed the designation of Hunters Point Annex (HPA) to Hunters Point Shipyard (HPS). |
| Comment 3 | Please verify that NUREG-1507 referenced in the newly added Appendix A, Attachment X, is to be used in addition to NUREG-5849. If so, this reference should be added to page 6 under Section 2.1. "Radiological Survey Guidance Documents" and to "References" on page 52. |
| Response | This comment is noted, and the reference will be added. NUREG-1507 was referenced an example of a possible technical approach to evaluate data generated from the Phase III radiation investigation. |

SPECIFIC COMMENTS:

Comment 1 **Page 18, Section 3.1.2.1, Building 214 (Room 1050), Recommendation.**
"Building 214" was changed to "Building 215." Please verify that this is a
"typo" and will be changed back to the earlier version, "Building 214."

Response **"Building 215" is a typographical error and will be changed back to "Building**
214."

Comment 2 **Page 29, Section 3.1.4.6, Buildings 830 and 831, Site Reconnaissance. Please**
verify that the "building" referred to includes both Buildings 830 and 831
and that they are owned, instead of leased, by University of California at
San Francisco.

Response **The report will be revised to explain that the University of California at San**
Francisco (UCSF) owns Buildings 830 and 831.

Comment 3 **Page 5 of Responses to Comments, Response to Comment 7 (Page 23,**
Section 3.1.3.6, Building 365). DHS was unable to find the letter attached
that references this building. The attached documents only referred to
Buildings 815, 364, and 816. The additional responses and additions to
pages 23 and 24 of the text appear to adequately address DHS' concerns
about this building. Please specify where in the document sent to DHS
(Memorandum 165-52, dated 19 August 1979, from A. F. Wardwell,
regarding monitoring and decontamination of ex-NRDL Buildings 815, 364,
and 816) is the information regarding Building 365. If this information is
not available, please clarify or remove the sentence, "These letters are
provided as an attachment." from the response to Comment 7.

Response **The Navy apologizes for the confusion. Because DHS's concern about Building**
365 has been adequately addressed, the Navy will not submit any more
documentation concerning this building unless requested to do so.

Comment 4 **Page X-2, Attachment X of Appendix A. The first sentence of the last**
paragraph references NUREG-5489. Please verify if this is the correct
document or whether it was intended as NUREG-5849.

Response **The report will be revised to correctly refer to NUREG-5849.**