



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
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May 20, 1996

Mark Evans, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Historical Radiological Assessment - Responses to EPA comments

Dear Mr. Evans:

Thank you for the opportunity to review the Navy's March 6, 1996 response to EPA's letter dated June 2, 1995 regarding the Historical Radiological Assessment ("HRA"). As discussed at our meeting on April 3, 1996, it appears that the majority of EPA's outstanding issues have been resolved. EPA believes that many of our concerns about radioactivity at the Naval Submarine Base in Groton, CT are adequately governed by either the Nuclear Regulatory Commission or Navy programs (e.g., building releases) and therefore do not need to be evaluated further under Superfund. However, conventional contamination at the site must be adequately characterized.

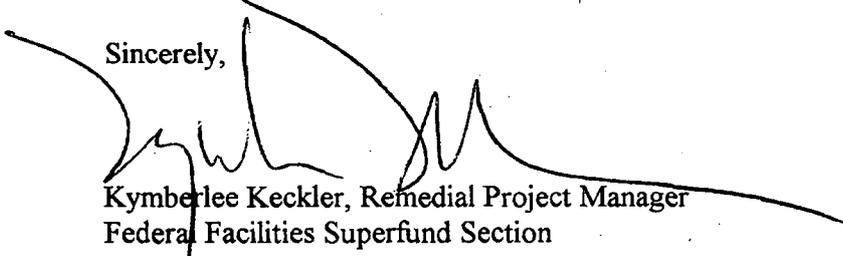
As discussed at the meeting, several comments will be addressed through text changes (e.g., comment numbers 1, 9, 11, and 27). I look forward to reviewing the revised text.

After review of the additional data presented, Cobalt-60 appears to be an adequate tag compound. EPA therefore rescinds all previous comments regarding this issue.

Carbon-14 bioaccumulates in the environment (see NUREG/CR-3332, ORNL-5968, Chapter 9). Please revise the response to comment number 14b and the HRA text accordingly.

Please do not hesitate to contact me at (617) 573-5777 should you have any questions or wish to arrange a meeting.

Sincerely,



Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section



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