



DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, WEST
NAVAL FACILITIES ENGINEERING COMMAND
900 COMMODORE DRIVE
SAN BRUNO, CALIFORNIA 94066-5006

N00236.001591
ALAMEDA POINT
SSIC NO. 5090.3
IN REPLY REFER TO:

5090.1
Ser 612.4/L8166
23 Jun 1998

Ms. Mary Rose Cassa
Project Manager
Office of Military Facilities
Department of Toxic Substances Control
Region 2
700 Heinz Ave., Suite 200
Berkeley, CA 94710-2737

Subj: RESPONSE TO DEPARTMENT OF TOXIC SUBSTANCES CONTROL AND DEPARTMENT OF HEALTH SERVICES COMMENTS ON THE WORK PLAN DRAFT FINAL BUILDINGS 5 AND 400 CONTAMINATED DRAIN PIPING REMOVAL (WP NO. NASA-1, REV 1, APRIL 8, 1998) AND THE WORK PLAN DRAFT FINAL LANDFILL 1 & 2 RADIOLOGICAL SURVEYS AND ANOMALY REMOVAL (WP NO. NASA-2, REV 1, APRIL 10, 1998)

Dear Ms Cassa:

Enclosed are responses to DTSC and DHS comments dated May 18, 1998 on the NASA-1 document for Alameda Point. There were no comments submitted on NASA-2. These documents will be finalized soon and the landfill radiological surveys will begin. Removal of anomalies within the landfills and inside buildings 5 and 400 will not proceed until the Action Memorandum/Final Remedial Action Plan is submitted.

If you have any questions, please contact me at (650) 244-2549, Fax (650) 244-2774.

Sincerely,

GEORGE KIKUGAWA
Remedial Project Manager
By direction

Encl:

- (1) Response to DTSC and DHS comments on the Work Plan, Draft Final, Buildings 5 and 400 Contaminated Drain Piping Removal (WP No. NASA-1, Rev 1, April 8, 1998)

Copies to:

Alameda Point, BRAC Environmental Coordinator (Attn: Mr. Steve Edde)
U.S. Environmental Protection Agency (Attn: Ms. Anna Marie Cook)
U.S. Environmental Protection Agency (Attn: Ms. Lynn Suer)
CAL Department of Health Services (Attn: Ms. Penny Leinwander)
CAL Regional Water Quality Control Board (Attn: Mr. Dennis Mishek)
Radiological Affairs Support Office (Attn: LCDR Lino Fragoso)
ARRA, (Attn: Ms. Elizabeth Johnson)
TTEMI, San Francisco Office (Attn: Mr. Ed Ho/Conrad Sherman)
TTEMI, Sacramento Office (Attn: Mr. Dan Shafer/Neal Hutchison)

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Subj: RESPONSE TO DEPARTMENT OF TOXIC SUBSTANCES CONTROL AND DEPARTMENT OF HEALTH SERVICE COMMENTS THE WORK PLAN DRAFT FINAL BUILDINGS 5 AND 400 CONTAMINATED DRAIN PIPING REMOVAL (WP NO. NADA-1, REV 1, APRIL 8, 1998) AND THE WORK PLAN DRAFT FINAL LANDFILL 1 & 2 RADIOLOGICAL SURVEYS AND ANOMALY REMOVAL (WP NO. NASA-2, REV. 1, APRIL 10, 1998)

IOC (Attn: David Horton)
NWT (Attn: Mike Wilson)
SSPORTS (Attn: Ron Lencker)

**Response to the California
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
and the DEPARTMENT OF HEALTH SERVICES
Review Comments submitted May 18, 1998
Regarding the Draft Final Work Plans for Buildings #5 and #400
and Landfills Sites #1 and #2**

Work Plan No. NASA-1, Revision 1, dated April 8, 1998:

GENERAL COMMENTS:

1. Comment -Although not a requirement for this removal action, it would be beneficial to SSPTS Environmental Detachment to have documentation supporting the quality of their radium analyses since future projects may require them. An audit of the laboratory by a qualified third party using the checklist from EPA QA/G-5 could be used to demonstrate all aspects of quality assurance are adequately addressed. The following items specific to radiochemistry are also recommended to be covered in the laboratory quality assurance manual:

- a) Use of NIST Traceable Standards for Calibration Standards
- b) Instrument Calibration:
 - i) Tolerance Charts
 - ii) Statistical QC Charts
 - iii) Efficiency and Background Control Charts
 - iv) Geometry and Calibration matrix Controls
 - v) Recalibration Schedules
 - vi) Background Subtraction Controls
- c) Laboratory QA/QC Control Samples (internal)
 - i) Duplicates
 - ii) Matrix Spikes
 - iii) Method Blanks
- d) Gamma Spectrometry Library Verification
- e) Radioanalytical Specifications and Methods
- f) Holding Times for Daughter ingrowth
- g) Formulas for sample activity, MDC, MDA, counting uncertainty, total propagated uncertainty
- h) Personnel Training and Qualifications
- i) Participation in Performance Evaluation Programs
- j) Audit Frequencies and by whom
- k) Data Validation Procedures
- l) Records Management

Response - The Navy agrees with the need to have documentation supporting the quality of the solid radiological sample analyses performed. Note that, over the past year, the number of solid samples analyzed by the laboratory has decreased significantly from the

number analyzed when Mare Island and Long Beach Naval Shipyard samples were being taken. Based on this reduction in the quantities of samples counted and recent Navy policy to minimize solid samples in favor of survey results when practicable, the SSPORTS Environmental Detachment may chose to send future solid samples to an outside laboratory for analyses.

NASA-1 and NASA-2, Revision 2 (Final Issue) will include the requirement to either demonstrate quality assurance aspects of the SSPORTS laboratory, using EPA QA/G-5 as a guide, or to utilize an approved outside laboratory for solid sample analyses.

2. Comment - Figures 4 and 5 need to be revised to more clearly show the pipes that will be removed.

Response - Figures 2, 3, 4 and 5 will be revised in NASA-1, Revision 2 (Final Issue) to clearly indicate which pipes will be removed, as well as, to identify any connecting piping that will remain in place after necessary surveys/sampling has been performed.

3. Comment - DHS will be performing independent surveys and sample collection during this removal action. Therefore, DHS requests notification prior to any replacement of piping that would limit access to pipe internals.

Response - Page 10, paragraph 5.2.1.1 of NASA-1, Revision 2 (Final Issue) will require final confirmation surveys of piping sections to remain in place before replacement piping can be installed. The final confirmation surveys and sampling will be controlled by the addition of the requirement for the Project Manager's (Ron Leneker) signature in Enclosure 7, Table 2 of NASA-1. This signature will be made only after DHS has concurred that replacement of piping may proceed.

Work Plan No. NASA-2, Revision 1, dated April 10, 1998:

No comments were submitted for Work Plan No. NASA-2.