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HUNTERS POINT
SSIC NO. 5090.3

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March 31, 1998

Mr. Richard E. Powell
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-2402

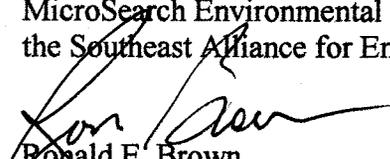
Dear Mr. Powell,

MicroSearch Environmental Corporation, as the Technical Advisor to the Southeast Alliance for Environmental Justice (SAEJ), has reviewed the Parcel E Draft Feasibility Study, Hunters Point Shipyard. We would like to comment on the following section of the Draft FS:

Section 4.2.4 Removal and Disposal of Scattered Radium Dials

Page 4-9, Paragraph 2, describes the mitigation measures for radioactive materials scattered by soil redistribution from IR-02 Northwest to other parts of Parcel E. During the proposed excavations, "if conditions prove to be more complicated than expected..., this mitigative measure will be reevaluated" and "Any radium-containing devices that are excavated will be contained in drums and shipped to an appropriate off-site facility." This seems to suggest that some radioactive materials might be left in place and capped while others are removed from the site, possibly travelling through the local community. Would the radioactive soil waste be staged on site until the total amount of all waste is known and excavated, or would it be removed from HPS after each anomaly is excavated? The community will most likely not want to have radioactive material moved through the neighborhood, only to discover that some materials may be left on site anyway. Would staged waste be reburied on site if disposal is reconsidered?

Sincerely,
MicroSearch Environmental on behalf of
the Southeast Alliance for Environmental Justice


Ronald E. Brown
President

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