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SUBMITTAL OF THE LETTER REPORT TO ADDRESS COMMENTS ON THE CLOSURE REPORT FOR CORRECTIVE ACTION UNIT 224: DECON PAD AND SEPTIC SYSTEMS, NEVADA TEST SITE, NEVADA, REVISION 0, MARCH 2008, DOE/NV/25946--XXX

Background
The Closure Report (CR) for Corrective Action Unit (CAU) 224, Decon Pad and Septic Systems, was approved by the Nevada Department of Environmental Protection (NDEP) on November 01, 2007. The approval letter contained the following two comments:

> Comment 1
> For 06-05-01, 06-17-04, 06-23-01 provide evidence that the 6 inch VCP pipe originating from building CP-2 is no longer active and sealed to prevent possible future contamination.
>
> Comment 2
> For the area that includes 06-03-01, provide evidence that active lines are no longer feeding the North and South lagoons and have been sealed to prevent possible future contamination.

To address these comments, closure documentation was reviewed, and site visits were conducted to locate and document the areas of concern. Additional fieldwork was conducted in March 2008 to seal the lines and openings described in the two comments. Photographs were taken of the closed drains and lines to document that the NDEP comments were adequately addressed and potential inadvertent discharge to the environment has been eliminated.

Documentation Review
Investigation and closure documentation was reviewed to identify the locations of potential drains, lines, and other features that could receive and/or transmit liquid. Based on the investigation findings and subsequent closure activities, no openings, distribution boxes, or other features (excluding known floor drains at CP-2) that could receive liquid were found at the CP-2 location (Figure 1), and potential manholes for the north and south sewage lagoons were identified for Corrective Action Site (CAS) 06-03-01 (Figure 2). The distribution box identified

in Figure 1 was not located during the investigation and was assumed to have been previously removed.

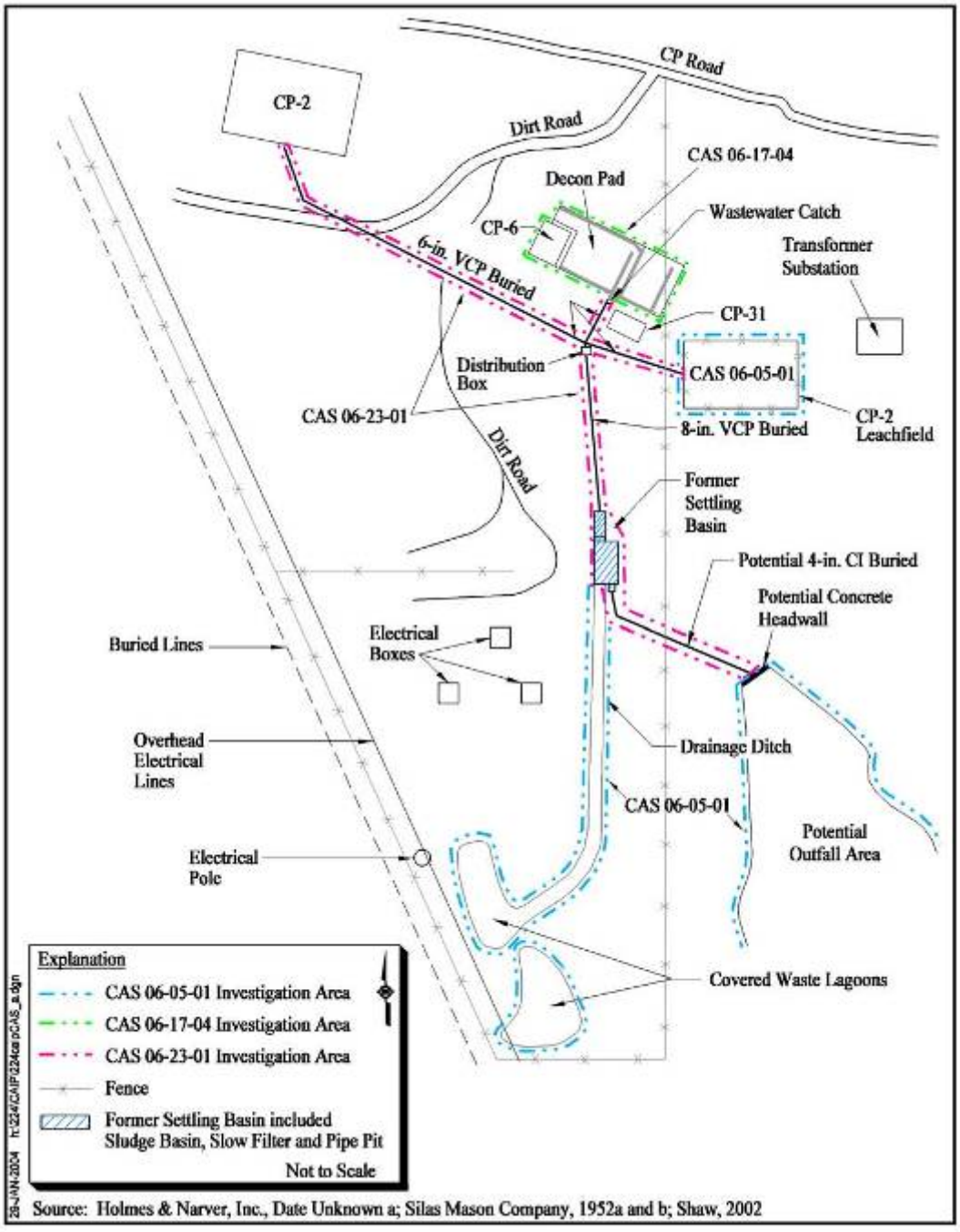

Figure 1. CP-2 Area Configuration

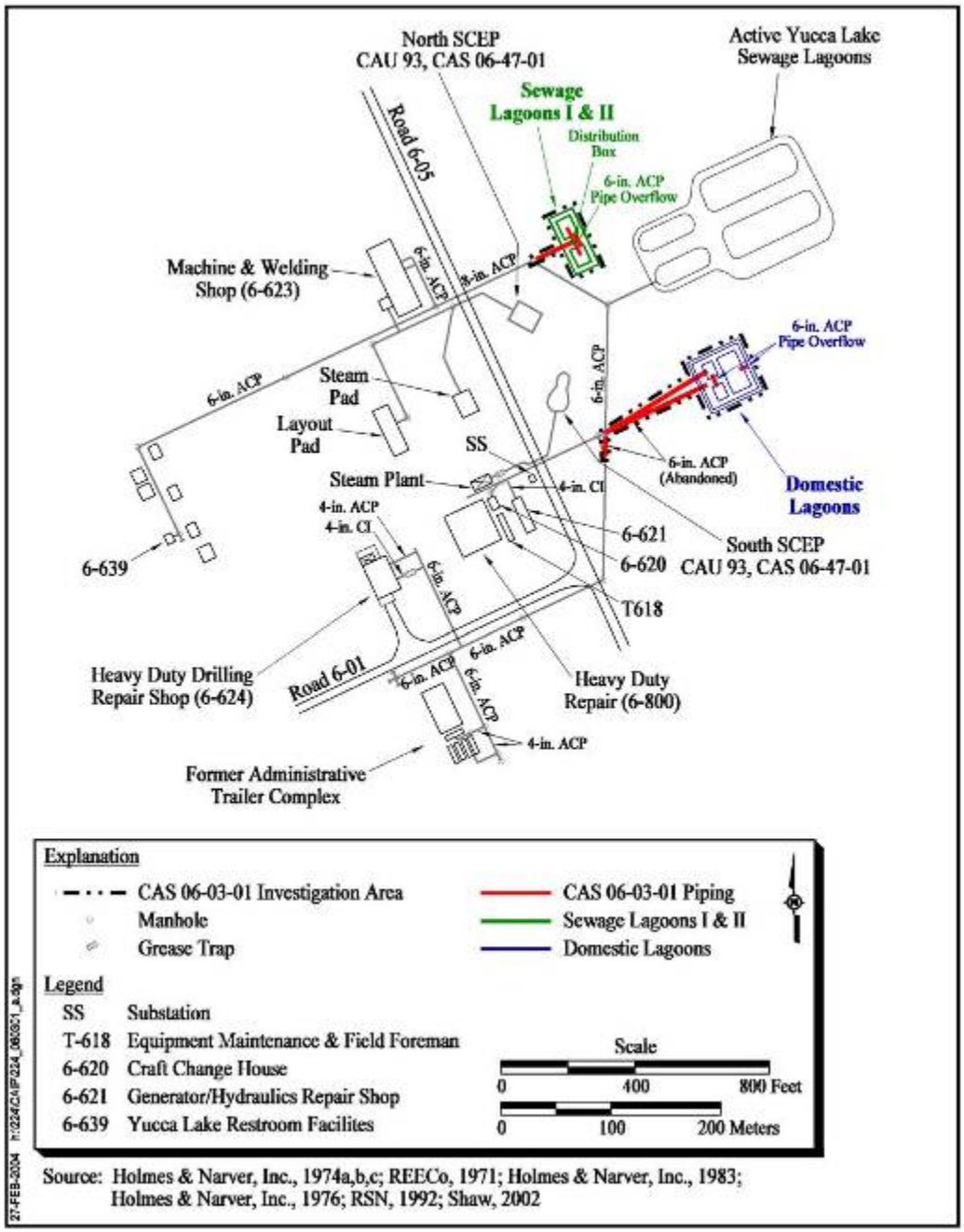

Figure 2. CAS 06-03-01 Configuration

Field Verification

A field visit with construction personnel and facility owners was conducted on March 11, 2008, to verify site conditions and identify the number and location of drains and lines required to be filled with grout. 20 drains and apparent drain openings were identified on the slab of the former CP-2 location. An example of the floor drains at the CP-2 location is shown in Figure 3. Some drains have metal grate-type covers, and some openings that appear to be drain pipes did not have drain covers. A current site map of the Area 6 sewer system was reviewed, and the area of the currently active sewer line was identified in the vicinity of CAS 06-03-01. The at-grade manhole cover for the inactive closed south sewage lagoon was located and opened for inspection. Piping openings in the bottom of the manhole were verified to be accessible for filling with grout (Figure 4). A line leading into the west side of the manhole was confirmed to have been previously grouted from the adjacent active manhole. The proximity of the CAS 06-03-01 manhole and active sewer system manhole are shown in Figure 5. The north sewage lagoon manhole could not be located; however, portions of a manhole and associated debris are located on the ground surface approximately 100 yards north of the estimated location of the former manhole (Figure 6). It is speculated that the manhole was removed during construction of the currently active sewer line and that the debris was moved to its current location on the edge of Yucca Lake. Prior to conducting the additional field activities, a utility survey was conducted, and a manhole was not located.

Figure 3. CP-2 Floor Drains

Figure 4. CAS 06-03-01 South Lagoon Manhole

Figure 5. CAS 06-03-01 South Lagoon Manhole and Active Sewer Manhole (foreground)

Figure 6. Suspected Location of the CAS 06-03-01 North Lagoon Manhole (removed)

Drain and Piping Closure

A utility survey using a hand-operated magnetometer was completed in an attempt to locate the CAS 06-03-01 north sewage lagoon manhole. The survey failed to locate any buried anomalies in the area which could be an indication of a buried manhole.

Fieldwork to fill drains and piping with grout was conducted on March 3, 2008. The bottom of the CAS 06-03-01 south sewage lagoon manhole was filled with grout to a depth of approximately one foot (Figure 7). The pipe openings in the bottom of the manhole were effectively sealed to prevent discharge to the closed septic system. Each of the 20 floor drains in the former building CP-2 foundation were located and marked with red paint. Sediment within the drains was removed to allow no less than four inches of grout to fill the openings. An example of floor drains in the CP-2 foundation filled with grout is shown in Figure 8.

Figure 7. CAS 06-03-01 South Lagoon Manhole Grouted

Figure 8. CP-2 Floor Drains Grouted

All known drains and piping associated with CAU 224 sewer systems have been filled with grout to prevent possible future discharge of liquid to the closed sewer system, and NDEP comments on the CR for CAU 224 have been addressed.

Please direct comments and questions to Kevin J. Cabble, of my staff, at (702) 295-5000.

John B. Jones
Acting Federal Project Director
Environmental Restoration Project

ERD:KJC

Enclosure:
As stated

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