

7/2/2019

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From: Parr, Nancy B. <parrnb@westinghouse.com>

Sent: Friday, June 28, 2019 10:12 PM

To: Kuhn, Kimberly M.; Berresford, James; Taylor, G. Ken

Cc: logsdocj@westinghouse.com; Joyner, Diana P; Wills Jr, Edward L.; Grant, Jeremy; Crews, Randy E; Bates, Raymond, L

Subject: June 2019 CA Monthly Progress Report

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*** Caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Please find the attached electronic submittal of the Consent Agreement Monthly Report. Please note that as we discussed, we removed 1-4 inches of soil today in an area underneath the intermodal container C-40 footprint. Soil sampling of the container footprint area will begin on Monday as specified in the Southern Storage Area OU Work Plan, Phase 2.

Thanks,

Nancy Parr

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Our ref: LTR-RAC-19-50

June 28, 2019

Subject: June 2019 CA Progress Report

Ms. Kuhn:

In accordance with Item 19 of Consent Agreement (CA) 19-02-HW, this progress report is being submitted to you, including the following requested information:

- (a) a brief description of the actions which Westinghouse has taken toward achieving compliance with the Consent Agreement during the previous month;
- (b) results of sampling and tests, in tabular summary format received by Westinghouse during the reporting period;
- (c) brief description of all actions which are scheduled for the next month to achieve compliance with the Consent Agreement, and other information relating to the progress of the work as deemed necessary or requested by the Department; and
- (d) information regarding the percentage of work completed and any delays encountered or anticipated that may affect the approved schedule for implementation of the terms of the Consent Agreement, and a description of efforts made to mitigate delays or avoid anticipated delays.

In response to the above requirements, the following is being reported to the Department since the last progress report on May 30, 2019:

- (a) Actions during the previous month:
 - Westinghouse began implementation of the Remedial Investigation (RI) work plan on 6/10/19. To comply with **Item 4** of the CA, the following was completed.
 - Utility location for affected areas.
 - Direct-push lithologic borings L1-L16
 - Rotosonic drilling of permanent wells: W-69, W-70, W-85, W-86, W-88, W-89, W-90, W-91, W-92
 - Vacuum-clearing for installation of permanent wells: W-72, W-73, W-74, W-75, W-76, W-79, W-80, W-81, W-82, W-83, W-84, W-87

- In accordance with **Item 1** of the CA, Westinghouse submitted the FINAL Remedial Investigation Work Plan on 6/18/19 (LTR-RAC-19-44). The final plan addressed the comments made by the Department in a letter to Westinghouse on 5/24/19.
- In accordance with **Item 2** of the CA, Westinghouse submitted Addendum 1 to the RI Work Plan, entitled “Southern Storage Area (SSA) Operable Unit Sampling Work Plan” on 6/18/19 (LTR-RAC-19-45). On 6/28/19, Westinghouse received the results of the Phase 1 sampling and with DHEC approval installed gravel in this area. Also, Westinghouse removed the degraded intermodal container, C-40 and packaged it for disposal. Upon removal of the container, radiological surveys performed on the soil underneath indicated some radiological surface impact near the back of the container. The area was cleaned up by removal of the top surface layer of soil (anywhere from 1 – 4 inches).
- In accordance with **Item 2** of the CA, Westinghouse submitted Addendum 2 to the RI Work Plan, entitled “Wastewater Treatment Area Operable Unit East Lagoon Sediment Characterization” on June 30 (LTR-RAC-19-49).

(b) Results of sampling and tests:

- The following table summarizes the results of the RI Work Plan, Addendum 1 - Phase 1 samples for the SSA OU. Based on these results as well as radiological surveys, Westinghouse determined that the soil in this area meets radiological free release criteria.

Sample Location	Isotopic Uranium (µg/g)	Technetium-99 (pCi/g)	pH	Ammonia (mg/kg)	Nitrate (mg/kg)	Fluoride (mg/kg)
1	2.635	3.62	5.55	86.4	2.15	1.32
2	0.9126	5.16	5.23	134	0.799	0.724
3	2.8009	0.785	4.48	84.8	1.19	ND
4	0.8123	4.81	4.63	55.4	1.30	ND
5	0.8086	4.22	5.23	53.5	1.08	ND
6	1.3662	-4.81	4.75	58.8	0.722	0.405
7	1.8245	3.60	5.49	149	1.60	1.36
8	0.6785	2.21	4.95	46.1	0.873	ND
9	1.8562	2.07	4.92	53	2.17	0.778
10	3.4219	-2.3	5.00	76.1	1.88	0.832
11	8.3490	4.46	4.72	51.0	2.84	0.702

- Regarding the soil underneath intermodal container C-40, 3 samples were taken in the areas of degraded drums was completed in the SSA OU. The results of 2.91, 2.93, and 3.85 ppm U were reported to the Department on 6/18/19 as part of the RI Work Plan, Addendum 1.

(c) Brief description of all actions which are scheduled for the next month:

- In accordance with **Item 4** of the CA, Westinghouse will continue to implement the Work Plan to include the following actions:

- Perform utility location as needed for W-77 and W-93 installation
- Hand auger W-78, as it is co-located with a Tc-99 soil sampling location
- Continue Rotasonic drilling of permanent wells within the controlled access area (CAA)
- Install Staff Gages
- Perform Bathymetric surveys
- Perform sediment, soil, and surface water sampling (weather permitting)
- Complete Phase 2 sampling identified in Addendum 1 to the RI Work Plan, entitled “Southern Storage Area (SSA) Operable Unit Sampling Work Plan”
- With DHEC approval, initiate Phase 1 sampling identified in Addendum 2 to the RI Work Plan, entitled “Wastewater Treatment Area Operable Unit East Lagoon Sediment Characterization”
- Meet with the Department to review the Conceptual Site Model (CSM), updated with RI data

(d) Percentage of work completed and any delays encountered or anticipated:

- 100% of lithologic borings are complete
- 10/25 (40%) of wells with known locations are installed
- 10/13 (77%) of remaining wells for installation have been vacuum-cleared to 5 feet
 - Well installation percentages exclude the 4 wells in flood plain whose location will be determined by the CSM output
- The installation of W-77 and W-93 have been delayed by unanticipated underground obstructions and densely located utilities in the vicinity of the proposed installation areas. Three alternate locations have been vacuum-cleared but have encountered subsurface interference. Westinghouse personnel have communicated the installation delays with the Department during the weekly update calls on June 20 and June 27. Additional locations are being evaluated and will be discussed with the Department for final approval prior to installation.

Respectfully,

Nancy B. Parr for

Diana P. Joyner
Principal Environmental Engineer
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Cc: N. Parr, Environmental Manager
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ENOVIA Records