



ENERGY AND ENVIRONMENT CABINET

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Governor

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Leonard K. Peters
Secretary

July 17, 2015

Ms. Jennifer Woodard
US Department of Energy
Portsmouth/Paducah Project Site Office
PO Box 1410
Paducah, Kentucky 42002

RE: Conditional Concurrence with the Sitewide Evaluation Report for the Soils Operable Unit (DOE/LX/07-1256&D2)
Paducah Site
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Woodard:

Kentucky received the D2 *Sitewide Evaluation Report for the Soils Operable Unit*, dated June 23, 2015. While the second comment was satisfactorily addressed, Kentucky was not satisfied with the revision made in response to the first comment. Please revise the document by issuance of a page change to address the attached condition.

If you have any questions or require additional information, please contact Gaye Brewer at (270) 898-8468, or e-mail gaye.brewer@ky.gov.

Sincerely,

A handwritten signature in cursive script that reads "Bill Schneider".

For April J. Webb, P.E., Manager
Hazardous Waste Branch

AJW:lww:geb

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DWM File: #1110; Graybar: AIN20110008

Attachment: RHB Condition

**Radiation Health Branch Condition Pertaining to the
Sitewide Evaluation Report for the Soils Operable Unit
Paducah Gaseous Diffusion Plant, Paducah, Kentucky**

(DOE/LX/07-1256&D2)

July 16, 2015

1. Condition #1:

The original comment read:

"The underlying intent of this sub-bullet is to explain that the survey did not indicate the presence of contaminants (specifically U-238) that exceed any of the risk-based levels of concern. The current wording (specifically "did not result in readings that indicated that any of the anomalies pose a risk to human health") can easily be interpreted as stating that there is zero risk, which is not factual.

Please revise this bullet to explain which values (e.g. risk-based no action level for the child recreational user, etc.) were not exceeded rather than making statements about not posing risks to human health."

The phrase specified in parenthesis (now underlined) indicated the text that should have been changed. The response merely amended this text with "as assessed for recreational use". While it may be helpful to add the titles of the use scenarios, the sentence after this insertion still has the same issue in that a person could easily read it to mean that there was no risk to a recreational user. This is not factual.

Please revise this paragraph to state:

"The radiological walkover survey conducted did not result in readings that indicated that any of the anomalies exceeded risk action levels when assessed for recreational use (i.e., current use scenarios), nor did the data indicate that risk action levels would be exceeded when compared to the most restrictive, reasonably probable future use scenario (i.e., the child recreational user)."

The underlined text indicates changes from the comment-response text.

- - End of Condition - -