

1. *"The EE/CA lists Cl-36 as one of the Radionuclides of Concern but the Interim Removal Action Work Plan screens out this isotope. Please provide an explanation for this."*

CABRERA Response:

The rationale for discriminating Cl-36 from the list of Radionuclides of Concern is explained on pages 17-18 of the IRA Work Plan. In summary, staff interviews provided the following information: 'Cl-36 was used in the lab environment only. Vials containing Cl-36 and any left over supplies were diluted and disposed via sewage disposal into the sanitary sewer. Empty and rinsed vials were likely disposed of in the radioactive waste disposal trenches because they contained the radioactive symbol label.'

At the time of the interviews with the NADC staff regarding Cl-36 disposal practices, the EE/CA was already undergoing review by EPA Region VII. Changing the ROC list in the EE/CA at that point was deemed unnecessary since the EE/CA is an evaluation document only. In contrast, the Action Memorandum for Site 1, which formally documents the chosen Removal Action recommended in the EE/CA, will have the same ROC list as the IRA Work Plan.

2. *"EE/CA states that monitoring for radionuclides was not conducted in the past. But the Interim Removal Action Work Plan on page 21 states that 'Monitoring has not identified any of these radioactive or chemical constituents of concern in the soil or ground water near the burial sites'. Please explain which monitoring they are referring to? Are they referring to monitoring of samples from monitoring wells?"*

CABRERA Response:

Upon closer review, the statement in paragraph 3 on page 21 of the IRA Work Plan referenced above will be deleted. The information is indeed incorrect and does not contribute vital information to the section. Monitoring information is presented elsewhere in the IRA.