

The Boeing Company  
Santa Susana Field Laboratory  
5800 Woolsey Canyon Road  
Canoga Park, CA 91304-1148

Certified Mail

February 12, 2008  
In reply refer to SHEA-106973

Mr. Norman Riley  
SSFL Project Director  
California Department of Toxic Substances Control  
1001 "T" Street  
PO Box 806  
Sacramento, California 95812-0806

SUBJECT: RCRA Facility Investigation of Radioactive Materials Handling  
Facility Santa Susana Field Laboratory

Dear Mr. Riley:

On behalf of the Department of Energy (DOE), The Boeing Company (Boeing) will be submitting a RCRA Facility Investigation (RFI) Work Plan Addendum Amendment (Work Plan) for sampling and analysis to be performed at the Radioactive Materials Handling Facility (RMHF) located in Area IV at the Santa Susana Field Laboratory (SSFL). Portions of the RMHF are included in a Part A permit issued to Boeing and DOE, and the latest revision of the closure plan for these radiological facilities was submitted to DTSC in October 2006. Implementation of the RMHF closure activities will be completed following DOE's completion of the Area IV Environmental Impact Statement (EIS) and final DTSC approval of the RMHF closure plan.

DOE and Boeing respectfully request a variance to the standard approach for RFI sampling at the RMHF to allow timely characterization of potential chemical impacts in accessible portions of the site. As specified in the RFI Work Plan Addendum (prepared by Ogden Environmental and Energy Services in 1996), RFI sampling at former radiological facilities has been performed following their release for (radiological) unrestricted use by DOE. Since the RMHF closure and release for (radiological) unrestricted use will not occur until both the Area IV EIS and the RMHF decontamination and decommissioning (D&D) activities are complete (now estimated to be in 2013), a significant delay in the RFI schedule would result if this approach is taken for the RFI sampling at the RMHF. Thus, to continue to achieve progress on the RFI and to meet the Consent Order completion date of 2017, DOE and Boeing request that DTSC allow investigation of the RMHF prior its release by DOE for (radiological) unrestricted use.



Mr. N. Riley

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DOE and Boeing realize that this request requires additional measures to be implemented, including analysis of all RFI samples for radiochemistry, and implementation of additional health and safety measures for compliance with DOE regulation 10 CFR 835 (Occupational Radiation Protection). These additional requirements will be described in detail in the RMHF RFI Work Plan, planned to be submitted to DTSC in early March.



As will be described in the RMHF RFI Work Plan, the proposed field work will include collection and analysis of samples from accessible locations within one of the RMHF permitted radiological facilities, specifically at Building 4621 and the associated Mixed Waste Storage Yard. This sampling was originally included as part of the RMHF Closure Plan (H&A, 2006). Although the closure plan has not yet been approved by DTSC, this sampling is being included as part of the RFI Work Plan in order to obtain as much characterization data as possible prior to preparation of the Group 7 RFI Report, which is currently planned for submittal in June 2009, several years before the closure and demolition activities of the radiological facilities in 2013. Any additional sampling or analysis requirements included in the final DTSC-approved RMHF closure plan will be implemented along with completion of the RMHF closure plan sampling at the currently inaccessible areas (i.e., inside Buildings 4021 and 4022). All data to be collected as part of the RMHF closure (i.e., samples collected during both the RFI sampling program and during the facility closure activities) will be reviewed by DTSC as either part of the RFI process for completion and approval of the Group 7 RFI Report, or as part of the RMHF permitted facility closure process.

DOE and Boeing would appreciate DTSC's response to this request at your earliest convenience. Implementation of the RMHF RFI Work Plan prior to radiological facility and DOE release for (radiological) unrestricted use will allow for timely RFI reporting and progress toward site closure. If you have any questions, please call me at (818) 466-8782.

Sincerely,

A handwritten signature in black ink that reads 'Raynesh Amar'.

Raynesh Amar  
Boeing Program Manager  
DOE Site Closure

cc:

Mr. Gerard Abrams, DTSC  
Mr. Thomas Johnson, DOE  
Mr. Art Lenox, Boeing  
Ms. Dixie Hambrick, MWH