



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
OFFICE OF RADIATION PROTECTION

111 Israel Road SE • P.O. Box 47827 • Olympia, Washington 98504-7827
TDD Relay Service: 1-800-833-6388

December 7, 2016

Sean Murphy, RSO
US Ecology Washington
1777 Terminal Drive
Richland, Washington 99354

License No. WN-I019-2

Subject: WN-I019-2, Annual Environmental Monitoring Report 2015

Dear Mr. Murphy:

Thank you for submitting the revised Annual Environmental Monitoring Report, for Calendar year 2015. The department has reviewed this report and is requesting that the report be reissued in its entirety to address the department's comments. The department expects that US Ecology will perform QA on this document and have the radiation safety committee review it before it is resubmitted. The department expects the report to be reissued by January 15th, 2017. Below are the comments from the department:

Comments from 2015 Annual Environmental Monitoring Report rev. 1:

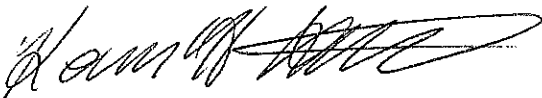
Comment No.	Section No. / ¶ / Page	Comments
1	General	Please include a revision number and issue date.
2	Table 3.1 Page 6	The first Notice of Correction/Violation involving LC 89 (Flow rate meter not calibrated) indicates that the corrective action was "Flow rate meter calibration not required". This is incomplete. A more complete response would be: USEW changed procedures to not require a calibrated flow rate meter.
3	Section 5.3 Paragraph 2 Page 19	The USEW statement "The slightly elevated Trench Cap 13 tritium concentration starting in 2006 has declined significantly." Does not seem appropriate since the level of H-3 in Trench 13 vegetation was 222 pCi/g as compared to the 2015 results of 212 pCi/g.
4	Section 5.3 Paragraph 2	USEW should not discuss data from 2006, if that data is not reflected in the graphs in appendix J.



	Page 19	
5	Section 5.3 Uranium	There is no data in the data base from 2006 for trench 16.
6	Section 5.3 Uranium	USEW should not discuss data from 2006, if that data is not reflected in the graphs in appendix J.
7	Section 6.1 Paragraph 5 Page 25	Why does USEW continue to reference out dated DOE groundwater reports? DOE issues ground water reports yearly and USEW is referencing a 2012 report.
8	Table 7.1 Page 41	Table 7.1 show audits done and provides corrective actions, but does not indicate findings that prompted the corrective actions.

If you have any questions, comments, or would like to discuss responses please do not hesitate to contact me at 360-236-3247.

Sincerely,



Kevin Siebert
Waste Management Section

cc:

Mike Ault, - Facility Manager, US Ecology
Joe Weisman - US Ecology Boise, Id
John Martell - Washington DOH
Mike Priddy - Washington DOH
Phil Rigdon- Yakama Nation
Rose Ferri- Yakama Nation