RECORD OF TECHNICAL CHANGE

Technical Change No. ROTC CAP-1
Project/Job No. Corrective Action Unit 139
Project/Job Name Waste Disposal Sites

The following technical changes (including justification) are requested by:

Alissa Silvas (Name) Technical Document Lead (Title)

Description of Change:

1. Page 10, Executive Summary, second paragraph — Replace the fifth bullet with the following:
   CAS 06-19-03, Waste Disposal Trenches, will be closed in place with administrative controls. A soil cover will be installed using compacted, unprocessed native soil. The cover will have a minimum thickness of 2 feet and sufficient slope to prevent ponding and infiltration. Monuments will be installed, UR warning signs will be posted, and a UR will be implemented. In addition, as a BMP, the water line that currently runs through the CAS will be diverted to a location outside the waste trenches and cover boundary.

2. Page 1, Section 1.2 — Replace the first sentence with the following:
   The approved closure activities for CAU 139 include removal of soil and debris contaminated with plutonium (Pu)-239, excavation of geophysical anomalies, removal of surface debris, construction of a soil cover, and implementation of use restrictions (URs).

3. Page 3, Table 1, fifth row, last column — Replace the second bullet with the following:
   Construct a soil cover using compacted, unprocessed native soil.

4. Page 10, Figure 4 — Replace Figure 4 with the attached figure.

5. Page 11, Section 2.1.3 — Replace the first full paragraph on Page 11 with the following:
   The site will be closed in place with administrative controls. As a BMP, the water line that runs through the CAS will be diverted to a location outside of the waste trenches and cover boundary. A soil cover will be installed using compacted, unprocessed native soil. The cover will have a minimum thickness of 2 ft and sufficient slope to prevent ponding and infiltration. Monuments will be installed to delineate the UR area, and UR warning signs will be posted. A UR will be implemented to prohibit any unauthorized intrusive activity. The corrective actions will be confirmed by visual inspection and photographic documentation of the final site conditions. Annual site inspections will be required to ensure that the signs are intact and legible and that the UR is maintained.

6. Page 11, Section 2.2 — Replace the first paragraph with the following:
   Construction activities will include removal of contaminated soil and debris, implementation of URs, and construction of a soil cover over the disposal trenches at CAS 06-19-03, Waste Disposal Trenches. No engineered structures will be constructed as part of site closure. Therefore, a construction quality assurance/quality control (QA/QC) plan is not required.

7. Page 13, Section 2.3.1 — Delete the first paragraph on Page 13.

8. Delete the contents of Appendix A.1, Engineering Specifications and Drawings, and add the following footnote to the cover page of Appendix A.1:
   Engineering specifications and drawings are not required for closure of CAU 139. This Appendix is included here as required by the approved Federal Facility Agreement and Consent Order outline for a Corrective Action Plan.
Justification:
The waste trenches at CAS 06-19-03 contain waste that has been buried for at least 35 years. The waste trenches are in an area of low use with little potential for future exposure to personnel. As currently configured, there is adequate cover over the trenches and little potential for water to infiltrate or pool within the waste. This was demonstrated during installation of a water line in this area in 2004. A waste trench was breached at that time, and the top of the waste was approximately 3 feet below the existing ground surface. Precipitation at NTS is extremely low, and the evapotranspiration rate is high. Therefore, precipitation does not penetrate more than a few feet below ground surface. Distance to groundwater in this area is approximately 1,500 feet.

Site characterization conducted in 2006 consisted of collecting samples from areas outside the waste trenches. No contaminants of concern were identified based on the samples collected outside the waste trenches; therefore, no contaminants of concern have migrated laterally beyond the boundaries of the landfill.

The Nevada Administrative Code requirements are intended to limit infiltration into waste trenches, and current site conditions meet this intent. No migration of contaminants was discovered during the site investigation, the trenches are currently covered, and no erosion has been noted since closure more than 35 years ago.

The current configuration of the CAU 139 waste trenches is sufficient to limit infiltration, prevent exposure to the waste, and prevent contaminant dispersion.

The project time will be decreased by approximately 10 days.

Applicable Project-Specific Document(s):


Approved By:  

/s/ Kevin Cabble  
NNSA/NSS Federal Sub-Project Director  
See original  

Date 1-6-09

/s/ Acting Federal Project Director  
NDEA  
See original  

Date 1-6-09

Date 1-8-09