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Tx - Iowa Army Ammunition Plant (IAAAP) Radiological Survey Plan for Yard C, Yard G, Yard L, Warehouse 3-01 and Line 1, Revision 0 dated 4/12/06 with responses to comments

Author/Originator  
Sharon Cotner

Company  
CEMVS-PM-R

Date  
4/21/2006

Recipient(s)  
Scott Marquess

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DEPARTMENT OF THE ARMY  
ST. LOUIS DISTRICT, CORPS OF ENGINEERS  
8945 LATTY AVENUE  
BERKELEY, MISSOURI 63134

REPLY TO  
ATTENTION OF:

April 21, 2006

Formerly Utilized Sites Remedial Action Program

Subject: Iowa Army Ammunition Plant Radiological Survey Plan for Yard C,  
Yard G, Yard L, Warehouse 3-01 and Line 1 (Red Sites document) dated April 12, 2006

Mr. Scott Marquess  
U.S. Environmental Protection Agency, Region VII  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

Dear Mr. Marquess:

Please find enclosed a copy of the subject document for your files. Copies of this document are also being provided to Mr. Dan McGhee (Iowa Department of Public Health) and Mr. Steve Bellrichard (Iowa Army Ammunition Plant). Also enclosed are the responses to comments submitted.

It should be noted that this is the final document (Rev. 0) describing the walkover survey and sampling which took place in September 2005. Previously furnish comments regarding the radiological classification and ultimate radiological decisions of the sites will be addressed in the Final Status Survey Plan. Only decisions pertaining to how samples were chosen and what surveys and samples were implemented are addressed in this document.

If you have any questions regarding this document, please contact Mr. Ron Frerker at (314) 260-3936.

Sincerely,

Sharon R. Cotner  
FUSRAP Program Manager

Enclosure



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Mr. Dan McGhee  
Bureau of Radiological Health  
Iowa Department of Public Health  
401 SW 7<sup>th</sup> Street, Suite D  
Des Moines, IA 50309-4611

Dear Mr. McGhee:

Please find enclosed a copy of the subject document for your review. Copies of this document are also being provided to Mr. Scott Marquess (U.S. Environmental Protection Agency) and Mr. Steve Bellrichard (Iowa Army Ammunition Plant). Also enclosed are the responses to comments submitted.

It should be noted that this is the final document (Rev. 0) describing the walkover survey and sampling which took place in September 2005. Previously furnish comments regarding the radiological classification and ultimate radiological decisions of the sites will be addressed in the Final Status Survey Plan. Only decisions pertaining to how samples were chosen and what surveys and samples were implemented are addressed in this document.

If you have any questions regarding this document, please contact Mr. Ron Frerker at (314) 260-3936.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon R. Cotner".

Sharon R. Cotner  
FUSRAP Program Manager

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REPLY TO  
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April 21, 2006

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Subject: Iowa Army Ammunition Plant Radiological Survey Plan for Yard C,  
Yard G, Yard L, Warehouse 3-01 and Line 1 (Red Sites document) dated April 12, 2006

Mr. Steve Bellrichard, SJMIA-INE  
Iowa Army Ammunition Plant  
17571 State Hwy 79  
Middletown, IA 52638-5000

Dear Mr. Bellerichard:

Please find enclosed a copy of the subject document for your review. Copies of this document are also being provided to Mr. Scott Marquess (U.S. Environmental Protection Agency) and Mr. Dan McGhee (Iowa Department of Public Health). Also enclosed are the responses to comments submitted.

It should be noted that this is the final document (Rev. 0) describing the walkover survey and sampling which took place in September 2005. Previously furnish comments regarding the radiological classification and ultimate radiological decisions of the sites will be addressed in the Final Status Survey Plan. Only decisions pertaining to how samples were chosen and what surveys and samples were implemented are addressed in this document.

If you have any questions regarding this document, please contact Mr. Ron Frerker at (314) 260-3936.

Sincerely,

A handwritten signature in cursive script that reads "Sharon R. Cotner".

Sharon R. Cotner  
FUSRAP Program Manager

Enclosure

**Comments on the Rev B Iowa Army Ammunition Plant  
Radiological Survey Plan for Yard C, Yard G, Yard L, Warehouse 3-01, and Line 1 dated August 24, 2005**

No.	Sec./ para./ line	Comment	Initials	Response	Initials
1	Page 1, Section 1-1	first sentence - Word "Plant" missing the letter "t"	Bellrichard	Added a t.	
2	Page 1, Section 1-1	first sentence - Change "in Burlington" to "near Middletown"	Bellrichard	Changed Burlington to near Middletown.	
3	Page 1, Section 1-2	add a space between first and second paragraph	Bellrichard	Space added.	
4	Page 1, Section 1-2, 2nd paragraph, last sentence	This sentence was written for the screening sites, in that, if no Rad was found, no further action was necessary. As FUSRAP is responsible for Rad and Chem contamination at these sites, this sentence needs to be rewritten. Possibly if you qualified the no further action statement to rad only might be sufficient.	Bellrichard	Concur in part - paragraph changed as follows: "The areas under investigation have been designated as impacted in accordance with MARSSIM. The scope of this survey plan is to generate data, which, when combined with data from the aerial scan, will support a determination of a MARSSIM Classification as a Class III, Class II, or Class I and the need for additional delineation data. ." This change was made due to State and EPA comments.	
5	Page 4, Table 3-1	Steve Bellrichard is the IAAAP Project Manager. Please remove Leon's name. My phone number is 753-7150.	Bellrichard	Changed to Steve Bellrichard. Changed phone number as well.	
6	Page 20, section 5.1.1, 2nd paragraph, 6th sentence	Need to be more clear that you are talking about the land between the bunkers, not Yard C itself, as Yard C's primary purpose is to store ammo, not to produce hay.	Bellrichard	Sentence changed to read "The majority of the land in Yard C is basically an open field that is currently being used for hay production."	
7	Page 20, section 5.1.1, 2nd paragraph, 2nd sentence	Add the word "be" between "can accessed".	Bellrichard	Added "be".	
8	Page 26, section 5.3.3	I would beef up this sentence to say exactly what has been surveyed at yard 1 (i.e. interior of warehouse and loading docks).	Bellrichard	Sentence changed to "The interiors and loading docks of Warehouse L3-71, L3-72, and L3-73 were surveyed by FUSRAP in 2003."	
9	Page 26, section 5.4.1, first paragraph, last sentence	Because chemical investigation have been conducted at line 3, I would qualify the "no investigations" with rad.	Bellrichard	Sentence changed to "No radiological investigations specific to Warehouse 3-01 are known to have been conducted."	
10	Page 28, section 5.5 - general comment	I would remove all non rad related discussion from this section and focus just on the rad history and investigation that has taken place here. You could add some general statement regarding chem contamination, but don't get into specifics, as this make the EPA review more time consuming.	Bellrichard	No change - EPA comments suggest adding more historical information.	
11	Page 35, section 5.5.3, 4th paragraph, first	The Army and not the USACE signed all of the 3 current RODS for the IAAAP	Bellrichard	Changed sentence to reflect Army.	

**Comments on the Rev B Iowa Army Ammunition Plant  
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12	<p>sentence Page 35, section 5.5.3</p>	<p>Why is the AEC 1975 interior RAD survey is not mentioned here. I think it should be, as well as a discussion about the difference in buildings surveyed between the 1975 AEC and the 2000 DOE survey.</p>	Bellrichard	<p>Text changed to "At the request of the DOE, Oak Ridge National Laboratory (ORNL) conducted an indoor radiological survey which included all the buildings surveyed by AEC in 1975 including five additional buildings denoted below at the IAAAP in 2000 and published their findings in <i>Results of the Indoor Radiological Survey of the Iowa Army Ammunition Plant, Middletown, IA, July 2001.</i>"</p>
13	<p>Page 37, third bullet</p>	<p>I would mention that the plastic pail containing the RAD was removed and disposed of by AO.</p>	Bellrichard	<p>Text changed to reflect pail was removed and disposed of. "Building 1-61. Contamination was found inside a plastic storage pan (removed and disposed of) located in Bay R and it was identified by gamma spectroscopy as DU. It was found to be readily transferable. A smear sample of the pan was analyzed showing 2,500 dpm/1100 cm<sup>2</sup>. Direct measurements were as high as 1000 dpm/100 cm<sup>2</sup> alpha and 30,000 dpm/100 cm<sup>2</sup> beta. The contaminated plastic storage pan found in Building 1-61 was relatively new, suggesting that the contamination was likely due to Army operations."</p>
14	<p>Page 45, Section 5.5.6</p>	<p>With out the figures it is hard to comment on the "two areas" to be surveyed. Perhaps you could add some text to provide a reason for concentrating on these areas.</p>	Bellrichard	<p>Figures have been added.</p>
15	<p>Page 50, Section 7.0, last paragraph, last sentence</p>	<p>As with the 2004 screening survey plan, the IAAAP does not agree with the "to IAAAP" statement. The IAAAP will not be responsible for disposition of FUSRAP waste. No change necessary, just realize the IAAAP will not be doing this.</p>	Bellrichard	<p>Noted.</p>
16	<p>Figures (General)</p>	<p>remove all blue FUSRAP Screening Areas from legend b. label red FUSRAP areas in legend, something like "general site boundaries", otherwise, the boundaries need to be adjusted. For example the red boundary on figure 5-4 shows a larger area than the warehouse itself. This would lead one to believe you are surveying the ground around the warehouse. Also, the boundary on figure 5-2 does not follow the yard's fence. The legend is confusing. I think "AEC &amp; DOE" should</p>	Bellrichard	<p>FUSRAP Screening Areas and FUSRAP areas removed from the legends. Boundaries have been adjusted.</p>
17	<p>Figure 5-6</p>		Bellrichard	<p>Concur - legend has been clarified.</p>

**Comments on the Rev B Iowa Army Ammunition Plant  
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18	General Comments	<p>be "Buildings surveyed by both AEC and DOE". "DOE" should be "Buildings surveyed by DOE only". This really only makes sense if the buildings (02, 03, 05, and 07) that were only surveyed by AEC are highlighted and colored. I think these buildings need to be included in your survey, unless you have a good reason why they are not. In other words, the general rule we have been following is that if there is documentation that AEC used a building, it will be screened by FUSRAP. I think the AEC 1975 survey is such documentation. Who better to know which building to survey than the AEC. The 2001 DOE survey report does not adequately address the difference in surveys.</p> <p>All the technical fundamentals, making the report of this screening survey a good decision document, seem to be present. There are some substantive things, which we discussed and to which we all agreed at the TPP, that are missing. These items will become apparent in the specific comments below. But, for an immediate example, see Specific Comment #1.</p>	IOWA	<p>This survey was designed in accordance with MARSSIM to fully support Final Status Survey Evaluation at a later date. All data to be collected during this survey will be collected with sufficient quality such that the data can be used for Final Status Survey purposes in the future. However, the intent of this survey was to collect sufficient evidence to allow for delineation or collection of additional data IF elevated areas were identified that would need additional investigation or remediation. Thus the survey was designed to allow decision logic while in the field – if the survey does not identify elevated areas the data can be used during final status survey evaluation purposes, however, if elevated activity was identified, the field team would have the authority to perform additional investigation to support further designs.</p> <p>The actual Final Status Survey Plan capturing the substantive items identified during the TPP is in the process of being written.</p>	See Comment #18
19		<p>We recommend amending the plan in such a way as to make the report of the survey effort a "decision document" (for want of better nomenclature) rather than a "data presentation document." These decisions, then, can be incorporated into the RI Work Plan rather than additional surveys to generate the necessary decisions.</p>	IOWA		

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20		<p>For example, develop a "null hypothesis," which can be tested by the data. Then it can be accepted or rejected.</p> <p>The areas covered by this survey plan have been previously classified as, regardless of any modifiers, "impacted." This term has specific meaning in MARSSIM, which is, "Areas with a possibility of containing residual radioactivity in excess of natural background or fallout levels." (MARSSIM, p. GL-11) Once classified as impacted a Final Status Survey must be performed on that area. There is no other alternative. We will make recommendations to modify this plan to support a designation of Class III survey areas and how to use the data to support this type of survey.</p>	IOWA	<p>After a discussion that occurred on April 6, 2006 the comment was withdrawn.</p>	
21		<p>The current survey plan intends to act as a QA document for the data generated in the aerial scanning efforts. The scanning data from this survey will be "gross counts," adjusted for background. Please insure, in comparing the two data sets, that the data associated with Figure 5-2, "Gross-count results for the AMS aerial survey for the entire IAAAP facility" is used. The data associated with Figure 5-4 "Man-made gross count results for the IAAAP survey" are the aerial scan results after processing by an algorithm and cannot be compared to walk-over results. The flyover data is normalized for 1m from the ground. [Reference: "IAAAP AERIAL RADIOLOGICAL SURVEY—Draft Final, July 10, 2003."] ]</p>	IOWA	<p>Concur – when making technical comparisons between the two surveys – the "comparable" count rates for the two individual surveys will be utilized. However, it is not the intent to compare the surveys against each other, but rather to use both surveys to compliment and augment the data from the other. For example, the flyover survey showed that there is not widespread contamination in the general area within the flyover detectors' viewing window. The gamma walkover survey will be utilized to support the flyover data by reporting the count rates in the "shadow" areas that may have been shielded from view during the flyover.</p>	
22	Section 1.2, "Purpose and Scope	<p>The second paragraph states:</p> <p><i>The scope of this survey plan is to adequately investigate the areas identified in the PA as having a low probability for radioactive contamination in the soil. This survey will prove the existence of radioactive contamination in these areas or, provide evidence to declare no further action for radiological concerns</i></p>	IOWA	<p>Concur in part – paragraph changed as follows:  <i>"The areas under investigation have been designated as impacted in accordance with MARSSIM." The scope of this survey plan is to generate data, which, when combined with data from the aerial scan, will support a determination of a MARSSIM Classification as a Class III, Class II, or Class I as well as the need for additional delineation data."</i></p>	



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		<p><i>necessary if there is a failure to prove the existence of contamination.</i></p> <p>We recommend that this paragraph be modified to read:</p> <p><i>The areas under investigation are initially designated as "Class III Survey Areas." The scope of this survey plan is to generate data, which, when combined from the aerial scan, will support a determination of a Class III Survey Area for the areas identified in the PA. The decision criteria in this survey, and the data generated by it, could possibly be transformed to a Class III Final Status Survey. From that point, an entire area, or parts thereof, could be reclassified as a Class I or Class II area with the remainder requiring no further action.</i></p> <p>We further recommend that the following sentence be added to this section. "Based on the data from the Aerial Radiological Survey, the only radiological contaminant of concern is depleted uranium."</p>		<p>Concur in part - <i>"Based on the data from the historical evaluation and the Aerial Radiological Survey, the only radiological contaminant of concern is depleted uranium."</i></p>	
23	Section 4.1, "The Problem."	<p>The first sentence of the first paragraph states, "Individual areas located within the boundaries of IAAAP have been identified as potentially affected by various modes of radiological contamination." We recommend changing this sentence to read, "Individual areas located within the boundaries of IAAAP have been classified as impacted areas."</p> <p>We recommend that this paragraph be revised in its entirety to read:</p> <p><i>The decision for the individual areas</i></p>	IOWA	<p>After a discussion that occurred on April 6, 2006 the comment was withdrawn.</p>	
24	Section 4.2, "The Decision."		IOWA	<p>Concur. Paragraph has been revised as suggested.</p>	

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25	Section 4.3, "Inputs to the Decision."	<p><i>will be based on accepting or rejecting the Null Hypothesis (H<sub>0</sub>): "Residual radioactive contamination does not exceed the radiological screening levels." If the null hypothesis is rejected for a specific area, a decision must be made to re-define the area, and for those in which radiological contamination exceeds the radiological screening levels for the site classify them as Class I or Class II areas. If the null hypothesis is accepted, the individual areas will be cleared by a Class III Final Status Survey.</i></p>	IOWA	<p>Concur in part – the following sentence has been inserted at the end of the first paragraph <i>"The results of the historical information evaluation and the aerial radiological scan (documented as Aerial Radiological Survey), will be combined with the results of the soil samples obtained in this survey and the scanning data from waterways, between buildings and other areas possibly not detected by the flyover to form a complete survey of each area."</i></p>	
26	Section 4.4.1, "Biased Soil Sample Collection."	<p>The first and second paragraphs appear to contradict one another. The first paragraph implies that anomalies will be investigated as a part of this plan. The second says that they will be noted. Additionally, we recommend that the very last sentence of this section be revised to read, "Not only is the collection of biased soil samples from multiple count rate ranges needed to accept or reject the null hypothesis, using MARSSIM's elevated area criteria, but also to assist in planning future characterization</p>	IOWA	<p>Deleted – "will be noted in field logbooks" from second paragraph sentence.</p> <p>Concur in part. Sentence changed to read <i>"Not only is the collection of biased soil samples from multiple count rate ranges needed to accept or reject the null hypothesis but also to assist in planning future characterization efforts."</i></p>	

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27	<p>Section 4.4.2, "Random/Systematic Sampling."</p>	<p>efforts."</p> <p>We recommend re-naming this section, "Sample Parameters" and deleting the first two paragraphs. As written, the first two paragraphs are actually irrelevant. Since the areas under investigation have already been designated Class III, if the recommendation above is accepted, only levels above the screening levels are of concern. In Class III areas scan and sample coverage can be anywhere from 10%-100%. The aerial data supplies 100% scanning and the calculation of 12 samples provides 100% "statistical coverage." As agreed at the TPP, your scanning efforts would concentrate in those areas "shaded" from the flyover.</p> <p>Using a Class III designation addresses the situation described in the currently written second paragraph of this section. If there are two totally different areas in one survey unit, the statistics will enable accepting or rejecting the null hypothesis. If the null hypothesis for this sampling effort is similar to the one we recommended and the data supports rejecting it, the survey unit can be further divided into areas that maintain their Class III status and those that would be designated at least Class II.</p>	IOWA	<p>Do not concur – this text is designed to imply what decision logic is used to determine if random or systematic samples will be obtained. This logic is utilized in Section 5 for site specific areas. It so happens that the decision reached in Section 5 only applied random samples, but the logic in this section is still viable.</p>
28	<p>Section 5, "SURVEY IMPLEMENTATION."</p>	<p>Each survey unit has a sub-section of the form 5.x.2, entitled "Gamma Walkover Surveys." Each of these paragraphs contains the sentence, "If elevated radiological activity is identified due to the presence of increased gamma readings, the survey will either attempt to determine the extent of the elevated activity or gather enough additional information for proper planning of additional surveys to be performed during the planned Remedial Investigation." We recommend replacing these sentences with, "The survey results will be used to</p>	IOWA	<p>Do not concur – This survey was designed in accordance with MARSSIM to fully support Final Status Survey Evaluation at a later date. All data collected during this survey were collected with sufficient quality such that the data can be used for Final Status Survey purposes in the future. However, the intent of this survey was to collect sufficient evidence to allow for delineation or collection of additional data IF elevated areas were identified that would need additional investigation or remediation. Thus the survey was designed to allow decision logic while in the field – if the survey does not identify elevated areas</p>

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		test the null hypothesis. If the hypothesis is rejected, the survey areas will be modified and re-designated for further action during the Remedial Investigation."		the data can be used during final status, however, if elevated activity was identified, the field team would have the authority to perform additional investigation to support further designs.
29	Section 5.5.8, "Soil Sample Collection [Line 1]."	The current plan specifies taking 24 soil samples at Line 1. This is twice the number calculated for statistical 100% coverage. If it is prudent to take this number of soil samples, we recommend creating two survey units from Line 1, East Side and West Side, thus separating the two efforts. Each survey unit will then have twelve soil samples.	IOWA	Concur in part – When designing this survey in accordance with MARSSIM, it was determined that due to the physical separation of the two areas, the total size of the areas to be surveyed, and the increased probability of encountering contamination above background in these areas, it would be prudent to take more soil samples. In addition, to fully support Final Status Survey Evaluation (once the separate Final Status Survey Plan for IAAP has been approved) it was deemed prudent to take enough samples to justify two survey units once survey unit boundaries are established.
30	Editorial Comments	The second paragraph of Section 4.1 (p. 5) contains the phrase "...questions that requires..." We recommend changing this phrase to read, "... questions that require..."	IOWA	Concur.
31	page 20, section 5.1.1, 2nd paragraph, last sentence	Remove this sentence	Mr. Haines	Removed sentence.
32	Page 22, section 5.1.3	Interior of bunkers will not be allowed at this time.	Mr. Haines	Noted
33	Page 24, section 5.2.3	Interior of bunkers will not be allowed at this time.	Mr. Haines	Noted
34	Page 32, last paragraph	Delete the model number for the grenade. This type of info is not appropriate for a public document	Mr. Haines	Model numbers deleted.
35	Page, last paragraph before section 5.5.2.2	Delete model number for the warhead. This is a global type comment. Completely review this section and make sure this type of information is not included.	Mr. Haines	Model numbers deleted. Global review done to insure deletion.
36	Page 36, section 5.5.3, paragraph starting with, "At the request...."	The first sentence is inaccurate in that not all of the building surveyed by AEC in 1975 were surveyed by DOE in 2000. According to the FUSRAP PA, buildings 1-02, 1-03, 1-05 (1E and 2E), and 1-07 were only surveyed by AEC. Conversely, according to the FUSRAP PA, buildings 1-61, 1-100-1, 1-137-4, and 1-148 were only surveyed by DOE.	Bellrichard	While the PA does state that buildings 1-2, 1-3, 1-5, and 1-7 were surveyed by AEC, the Congressional Report from June 2000 does not report those buildings as surveyed by AEC.  According to the <i>Results of the Indoor Survey of the Iowa Army Ammunition Plant, Middletown, Iowa</i> , the DOE surveyed 1-18, 1-61, 1-100-1, 1-100-2, 1-137-4, and 1-

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37		It is my understanding from what was said at the TPP meeting, AO has surveyed all of these buildings as well. State of Iowa said they could get access to these records. I don't see that this info was pursued, was it?	Bellrichard	148. This information was not pursued for this document. The bunkers are not a primary radiological concern from AEC operations, however, the surveys will be pursued for use during the remedial investigation and/or the decision for further actions.
38	Figure 5-9	Buildings 1-66-1, 1-66-2, and 1-63-7 should be colored green (i.e. surveyed by both AEC and DOE), source DOE survey	Bellrichard	These buildings have been added to the map and will be colored as surveyed by both AEC and DOE.
39	Figure 5-9	Not all of building 1-12 was surveyed. It is my understanding that only the southern 1/3rd of this structure was.	Bellrichard	The intent of the figure is just to show that a survey was done and by whom.
40	Figure 5-9	This figure would be a good place to show where RAD has been found (Bay CC in building 1-12).	Bellrichard	Visually could not display this information at current scale. The intent of this map was to identify soil areas adjacent to AEC-used buildings that would require coverage. Building interiors will be addressed in greater detail in the future Remedial Investigation.
41	Figure 5-8 - General Comment	Please review DOE survey, lots of mistakes on figure	Bellrichard	Corrections have been made.
42	Figure 5-8	Similar to comment 41 above, buildings 1-02, 1-03, 1-05 (1E and 2E), and 1-07 were only surveyed by AEC. These are not marked on your map.	Bellrichard	Figures have been modified to address this.
43	Figure 5-8	Should the "Focus Area" be revised to cover the buildings listed in comment 42?	Bellrichard	Figures have been modified to correct this.
44	Figure 5-8	This figure would be a good place to show where RAD has been found (1-63-6, 1-11, and 1-61	Bellrichard	Visually could not display this information at current scale. The intent of this map was to identify soil areas adjacent to AEC-used buildings that would require coverage. Building interiors will be addressed in greater detail in the future Remedial Investigation.
45	Figure 5-8	Why is building 1-148 left out of the "focus Area"?	Bellrichard	Building 1-148 has been included in the Focus Area.
46	Figure 5-8	Building labeled 1-67, should be labeled 1-67-1.	Bellrichard	Label Changed to 1-67-1
47	Figure 5-8	Building labeled 1-82-75B should be labeled 1-100-1, building 1-82-75B was not surveyed	Bellrichard	Label was changed to 1-100-1.
48	Figure 5-8	Building labeled 1-65-1 should be labeled 1-65-5	Bellrichard	Label changed to 1-65-5
49	Figure 5-8	Building 1-65-1 and 1-65-2 are not labeled and should be colored green (i.e. AEC and DOE)	Bellrichard	Concur.

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50	Figure 5-8	Building 1-100-2 is missing. I could not find the building either, but it should be researched.	Bellrichard	Building 1-100-2 is on Figure 5-9.
51	Page 50, Section 7.0, last paragraph, last sentence	As with the 2004 screening survey plan, the IAAAP does not agree with the "to IAAAP" statement. The IAAAP will not be responsible for disposition of FUSRAP waste. No change necessary, just realize the IAAAP will not be doing this.	Bellrichard	Noted
52	Page 20, Second Paragraph, last sentence	Delete the last sentence. This type of information should not be published.		Deleted.
53	Page 32 Section 5.5.2.1, last and second to last Paragraph.	Delete model numbers from any and all products. It is okay to say grenades or warheads, but it is not acceptable to say XMW123 grenade. This comment is global, so if other parts of the document contain model numbers, please remove.		Deleted.
54		Can justify the "no further action" for rad comment		Concur - sentence changed in section 1.2
55	General comment	The document lacks historical information to support a sampling program and that the details of the sampling program that will be conducted are lacking. So, based on a quick turnaround review, I'm not in a position to support one of the stated purposes in the plan, which was that the plan would provide data that could justify "no further action" for rad.  The plan may produce such data, but it's not clear to me based on what is written in the plan that it will certainly yield data that will further our knowledge of the site, and will contribute to defining what work will be required during the RI. If the supporting historical/background information that is presented with the walkover results is beefed up (presumably in the RI Report?), then we may be in a position to support NFA if the data accommodates it.	SM	See comment response #4.