

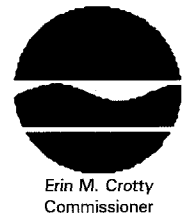
**New York State Department of Environmental Conservation  
Division of Solid and Hazardous Materials**

**Bureau of Radiation**

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September 13, 2002

Dr. Judith Leithner  
U.S. Army Engineering District, Buffalo District  
1776 Niagara Street  
Buffalo, NY 14207-3199

Re: Niagara Falls Storage Site  
Draft Baseline Risk Assessment Interim Deliverable  
(August 5, 2002)

This letter transmits the New York State Department of Environmental Conservation's comments on the Niagara Falls Storage Site's draft Baseline Risk Assessment Interim Deliverable, which was delivered to our office on August 5, 2002. This document, which in its present state is an outline with many sections still to be written, appears to be well thought out. However, since many sections are still under development and data are still being obtained, more comments may be coming once the draft risk assessment is completed.

Thank you for the opportunity to comment on this. If you have any questions or need further information, please contact John Mitchell, of this Bureau, at (518) 402-8573.

Sincerely,

Paul J. Merges, Ph.D.  
Director  
Bureau of Radiation, DSHM

Enclosure

cc: w/encl. - Lt. Col. J. M. Hall, USACE  
P. Giardina, USEPA  
A. Salame-Alfie, NYSDOH  
H. Sandonato, DEC Reg. 9

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**ENCLOSURE**

**New York State Department of Environmental Conservation  
Division of Solid & Hazardous Materials  
Bureau of Radiation**

**Comments on the  
Niagara Falls Storage Site's Draft Baseline Risk Assessment Interim Deliverable  
September 13, 2002**

- Comment 1: Page 1-2, Section 1.1, Strategy and Objectives: The third bullet contains the word "significantly" which may be too subjective. This word should be removed from the sentence.
- Comment 2: Page 2-3, Section 2.1.2.2, Background Characterization and Comparison: The first sentence of the first paragraph states, "The chemical-specific 95% upper tolerance limit, with 95% coverage (hereafter referred to as 95% UTL) . . . ." Two sentences later, the acronym "UTL" is used yet has never been defined. One could assume from the previous definition that UTL stands for upper tolerance limit, but it should be defined for clarification, unless wherever UTL is used, it is really supposed to be 95% UTL. If the latter is the case, we suggest changing "hereafter referred to as the 95% UTL" to read, "hereafter referred to as the UTL."
- Comment 3: We would like to see sensitivity analysis performed on the distribution coefficients presented as RESRAD parameters in Table 3.1
- Comment 4: The NFSS BRA should reference, and incorporate information therein, the many U.S. Department of Energy documents related to NFSS and the Fernald site wastes similar to those at NFSS. In addition, the reviewers should discuss appropriate sections of the National Research Council report published in 1995 entitled "Safety of the High-Level Uranium Ore Residue at the Niagara Falls Storage Site, Lewiston, New York."