

**Happy Valley Interim Source Removal Action (ISRA)
Soil Sampling for Radionuclides
Results and Statistical Analysis
Waste Certification**

This data package provides the laboratory results and statistical analysis of pre-excavation samples taken from the Happy Valley Interim Source Removal Action (ISRA) area. This analysis and data interpretation complies with procedures approved by the California Department of Public Health¹.

Forty four (44) samples taken for waste disposal characterization were analyzed for strontium-90, tritium and gamma emitting radionuclides by gamma spectroscopy, using an off-site laboratory. Minimum detectable activity (MDA) for cesium-137 and strontium-90 averaged ~0.04 pCi/g and ~0.04 pCi/g respectively. Minimum detectable activity for tritium averaged ~1.0 pCi/g. The

Conclusions

Cesium-137 - Based on the results of the statistical analysis of Appendix 1, soil to be excavated from the Happy Valley ISRA area does not exceed the local background for Cs-137. The incremental dose from Cs-137 above background is therefore zero mrem/y. The highest Cs-137 result is 0.113 pCi/g which is less than the highest background result. The highest non-background subtracted Cs-137 result is less than an effective dose of 0.08 mrem/y⁶.

Strontium-90 - Based on the results of the statistical analysis of Appendix 1, soil to be excavated from the Happy Valley ISRA area does not exceed the local background for Sr-90. The incremental dose from Sr-90 above background is therefore zero mrem/y. The highest Sr-90 result is 0.042 pCi/g which is less than the highest background result. The highest non-background subtracted Sr-90 result is less than an effective dose of 0.013 mrem/y⁶.

Tritium - All tritium results are non-detect, the average tritium result is -0.24 pCi/g and the highest non-detect tritium result is 0.39 pCi/g. The highest non-detect, non-background subtracted tritium result is less than an effective dose of 0.0055 mrem/y⁶.

This waste is certified to be "radiologically" acceptable for shipment to, and disposal at, any Class 1, 2 or 3 disposal facility. There are no radiological controls or restrictions imposed on future disposition or use of this soil.

This waste meets the requirements of disposal facility permits^{7,8} and complies with the California Health & Safety Code

not decommissioned material, and does not originate from the proximity of any radiological facility. The sampling in this certification has therefore been conducted as a best management practice that also complies with the requirements of D-62-02. Verification sampling and/or approval by the California Department of Public Health (CDPH) Radiologic Health Branch (RHB) are not required for the off-site disposal of decommissioned material or of the subject material¹⁰.



Phil Rutherford
Manager, Health, Safety & Radiation Services

¹⁰ The California Department of Public Health (CDPH) Radiologic Health Branch (RHB) has stated in a November 9, 2007 email to Phil Rutherford (Boeing) ... “*The Governor’s Executive Order D-62-02, does not specifically require the Department of Health Services (now the Department of Public Health) to perform verification sampling of decommissioned material or to provide approval for disposal of specific decommissioned material shipped offsite (e.g., to Class I or II landfills). The California DPH has not imposed a requirement that Boeing or the Department of Energy (DOE) seek DPH verification sampling or approval of all decommissioned material destined for Class I or II landfills in compliance with the Governor’s Executive Order.*”

Appendix 1

Wilcoxon Rank Sum Statistical Test for Cesium-137 and Strontium-90

Wilcoxon Rank Sum Test -- (Cesium-137)

General Information:

Instruction on how to use this template:

[REDACTED]

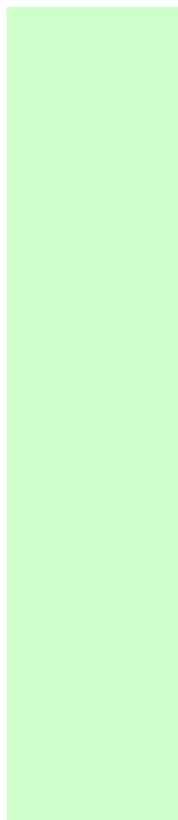
Test Result:

Survey sample concentrations do not exceed those in the background by more than the DCGL

Bkgd Ref (R) Survey (S)

| No. | Soil ID | Cs-137 | Adjusted Cs-137 | Area | Ranks | Reference Ranks |
|-----|---------|--------|-----------------|------|-------|-----------------|
|-----|---------|--------|-----------------|------|-------|-----------------|

| No. | Soil ID | Cs-137 | Adjusted Cs-137 | Area | Ranks | Reference Ranks |
|-----|---------|--------|-----------------|------|-------|-----------------|
|-----|---------|--------|-----------------|------|-------|-----------------|



| No. | Soil ID | Cs-137 | Adjusted Cs-137 | Area | Ranks | Reference Ranks |
|-----|---------|--------|-----------------|------|-------|-----------------|
| | | | | | | |

Wilcoxon Rank Sum Test -- (Strontium-90)

General Information:

Instruction on how to use this template:

[REDACTED]

Survey sample concentrations do not exceed those in the background by more than the DCGL

| No. | Soil ID | Sr-90 | Adjusted Sr-90 | Area | Ranks | Reference Ranks |
|-----|---------|-------|----------------|------|-------|-----------------|
|-----|---------|-------|----------------|------|-------|-----------------|



| No. | Soil ID | Sr-90 | Adjusted Sr-90 | Area | Ranks | Reference Ranks |
|-----|---------|-------|----------------|------|-------|-----------------|
| | | | | | | |

| Activity | +/- 2 σ Error | MDA | Non-detect? | Activity | +/- 2 σ Error | MDA | Non-detect? | Activity | +/- 2 σ Error | MDA | Non-detect? |
|----------|----------------------|-----|-------------|----------|----------------------|-----|-------------|----------|----------------------|-----|-------------|
|----------|----------------------|-----|-------------|----------|----------------------|-----|-------------|----------|----------------------|-----|-------------|

Act702(NDA)-3vMDA

■DA -0.18 0.53NDA

Soil Data from Happy Valley ISRA

Appendix 2
Analytical Radionuclide Results

ISRA Soil Sample Results for Happy Valley

| Project Name | Sampling Organization | Sampling Date | Sampling Location (General) | Sample Serial Number | Media Type | Isotope | Value | Error (+/-) | MDA | Non-Detect? | Units | Error Type | Analysis Protocol | Analysis Organization | Document | Status |
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|----------|--------|
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|----------|--------|

ISRA Soil Sample Results for Happy Valley

| Project Name | Sampling Organization | Sampling Date | Sampling Location (General) | Sample Serial Number | Media Type | Isotope | Value | Error (+/-) | MDA | Non-Detect? | Units | Error Type | Analysis Protocol | Analysis Organization | Document | Status |
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|----------|--------|
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|----------|--------|

ISRA Soil Sample Results for Happy Valley

| Project Name | Sampling Organization | Sampling Date | Sampling Location (General) | Sample Serial Number | Media Type | Isotope | Value | Error (+/-) | MDA | Non-Detect? | Units | Error Type | Analysis Protocol | Analysis Organization |
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|

ISRA Soil Sample Results for Happy Valley

| Project Name | Sampling Organization | Sampling Date | Sampling Location (General) | Sample Serial Number | Media Type | Isotope | Value | Error (+/-) | MDA | Non-Detect? | Units | Error Type | Analysis Protocol | Analysis Organization | Document | Status |
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|----------|--------|
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|----------|--------|

ISRA Soil Sample Results for Happy Valley

| Project Name | Sampling Organization | Sampling Date | Sampling Location (General) | Sample Serial Number | Media Type | Isotope | Value | Error (+/-) | MDA | Non-Detect? | Units | Error Type | Analysis Protocol | Analysis Organization | Document | Status |
|--------------------------------|-----------------------|---------------|-----------------------------|----------------------|------------|--------------|----------|-------------|--------|-------------|-------|------------|-----------------------|-----------------------|----------|--------------|
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0077RadS001 | Soil | Strontium-90 | 0.0307 | 0.0238 | 0.0372 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0078RadS001 | Soil | Strontium-90 | 0.0004 | 0.0232 | 0.0459 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0079RadS001 | Soil | Strontium-90 | 0.00167 | 0.0184 | 0.0353 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0080RadS001 | Soil | Strontium-90 | 0.0227 | 0.019 | 0.0295 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0081RadS001 | Soil | Strontium-90 | 0.0142 | 0.017 | 0.0287 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0084RadS001 | Soil | Strontium-90 | 0.00833 | 0.0263 | 0.0455 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0085RadS001 | Soil | Strontium-90 | 0.0419 | 0.0261 | 0.0419 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0086RadS001 | Soil | Strontium-90 | 0.000108 | 0.0164 | 0.0334 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0087RadS001 | Soil | Strontium-90 | 3.85E-05 | 0.0223 | 0.0397 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0088RadS001 | Soil | Strontium-90 | 0.00507 | 0.0218 | 0.0381 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0089RadS001 | Soil | Strontium-90 | 0.0103 | 0.0272 | 0.0471 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0090RadS001 | Soil | Strontium-90 | 0.0299 | 0.0272 | 0.0451 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0091RadS001 | Soil | Strontium-90 | 0.0272 | 0.0283 | 0.0472 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0092RadS001 | Soil | Strontium-90 | 0.0264 | 0.0247 | 0.041 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/29/2009 | Happy Valley | ISWC0093RadS001 | Soil | Strontium-90 | 0.0273 | 0.0216 | 0.0333 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234325 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/30/2009 | Happy Valley | ISWC0082RadS001 | Soil | Strontium-90 | 0.000193 | 0.0153 | 0.0306 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234376 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 7/30/2009 | Happy Valley | ISWC0083RadS001 | Soil | Strontium-90 | 0.0378 | 0.0236 | 0.0348 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 234376 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 8/17/2009 | Happy Valley | ISWC0094RadS001 | Soil | Strontium-90 | -0.00381 | 0.026 | 0.0476 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 235405 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 8/17/2009 | Happy Valley | ISWC0095RadS001 | Soil | Strontium-90 | -0.00968 | 0.0123 | 0.0296 | NDA | pCi/g | 2 sigma | EPA 905.0 Modified | GEL | 235405 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 07/01/2009 | Happy Valley | ISWC0001S001 | Soil | Thorium-228 | 1.38 | 0.153 | 0.0622 | NDA | pCi/g | 2 sigma | EML HASL 300, 4.5.2.3 | GEL | 233955 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 07/01/2009 | Happy Valley | ISWC0002S001 | Soil | Thorium-228 | 1.41 | 0.119 | 0.0551 | NDA | pCi/g | 2 sigma | EML HASL 300, 4.5.2.3 | GEL | 233955 | Pre-remedial |
| ISRA HV Waste Characterization | MWH | 07/01/2009 | Happy Valley | ISWC0003S001 | Soil | Thorium-228 | 1.27 | 0.129 | 0.0626 | NDA | pCi/g | 2 sigma | EML HASL 300, 4.5.2.3 | GEL | 233955 | Pre-remedial |

ISRA Soil Sample Results for Happy Valley

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|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|----------|--------|
|--------------|-----------------------|---------------|-----------------------------|----------------------|------------|---------|-------|-------------|-----|-------------|-------|------------|-------------------|-----------------------|----------|--------|

