

November 9, 2000

Mr. Arthur Kleinrath, Project Manager
U. S. Department of Energy
Grand Junction Office
2597 B 3/4 Road
Grand Junction, CO 81503

SUBJECT: U.S. DEPARTMENT OF ENERGY - DRAFT LONG-TERM SURVEILLANCE
PLAN FOR SHERWOOD SITE

We have reviewed the draft document, "Long-Term Surveillance Plan for the Sherwood Project (UMTRCA Title II) Reclamation Cell," dated December, 1999. Our comments on this Long-Term Surveillance Plan (LTSP) are provided in Attachment 1. These comments were finalized following our review of the Completion Review Report (CRR) submitted by the State of Washington Department of Health (WDOH). In the CRR, WDOH documented that all applicable standards were met by the design and final construction at the Sherwood site in Wellpinit, Washington.

In general, the LTSP is considered to be adequate to meet the requirements of 10 CFR 40.28. However, because the tailings that remain there will be saturated for an indefinite period of time, and a large amount of water is impounded behind the dam, the structure is formally classified as a dam. To meet Federal obligations under the requirements of the National Dam Safety Program Act, the dam must be inspected at regular intervals. Therefore, our comments are directed principally at those additional inspection items that must be included in the LTSP to meet applicable requirements.

You will note that our comments include a reference to monitoring piezometers along the dam face. At this time, these piezometers have not been installed, but the licensee has provided a commitment to WDOH to install them. Therefore, our comments are based on the assumption that the piezometers will be installed.

This review was performed by Ted Johnson. If you have any questions, please contact Mr. Johnson at (301) 415-6658.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA/ D Gillen for

Philip Ting, Chief
Fuel Cycle Licensing Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards

Enclosure: NRC Staff Comments on Sherwood Draft LTSP

cc w/encl: Western Nuclear Inc
Gary Robertson, Washington Department of Health

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NRC Staff Comments on Sherwood Draft LTSP

The inspection activities and inspection procedures provided in the draft LTSP, particularly the Appendix C checklist, cover inspection areas in sufficient detail to provide adequate long-term monitoring of the site features. However, because the embankment/dam will be formally classified as a dam and will need to be inspected to meet applicable dam safety regulations, DOE should provide additional dam safety information and should add several inspection procedures to the LTSP. (It may be useful to include these inspection and reporting procedures as a separate appendix in the final LTSP.).

1. The following dam safety information should be included in the final LTSP:

a. The LTSP should provide a detailed description of the dam features, including the dam, overflow areas, diversion channels, impoundment volume, and drainage area. Detailed drawings with plan views and sectional views should be included.

b. The LTSP should provide a detailed description of the piezometers, including locations, types, elevations, and construction/completion data.

2. The LTSP should include provisions for DOE to provide a report to the NRC staff that includes the following dam safety information:

a. The report should include a detailed evaluation of the field inspection to the NRC staff including information related to piezometric levels and graphs of piezometer data as a function of time. DOE should also include any visual observations of settlement, movement, erosion, seepage, leakage, cracking, deterioration in general, geologic conditions, foundation deterioration, condition of spillways and outlets, evidence of uplift pressure in foundations or abutments, or any other significant conditions.

b. The report should discuss the evaluations and observations identified above, and should provide findings, conclusions, and recommendations. This report may be provided separately or in the Title II annual report, but should provide all of the details and evaluations discussed above. An example of the type of report normally prepared for dam safety purposes was provided to Mark Plessinger electronically on November 6, 2000. This report is an example of a dam safety report prepared for the NRC staff by the Federal Energy Regulatory Commission.