



Department of Energy

Washington, DC 20585

September 9, 2014

ATTN: Document Control Desk, Deputy Director
Decommissioning and Uranium Recovery Licensing Directorate
Division of Waste Management and Environmental Protection
Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission
Mail Stop T8 F5
Washington, DC 20555-0001

Subject: Request for Concurrence with the U.S. Department of Energy's Planned Reduction in Monitoring Frequency at the Shiprock, New Mexico, Disposal Site

To Whom It May Concern:

The U.S. Department of Energy, Office of Legacy Management (DOE-LM) is proposing a reduction in the frequency of monitoring at the Shiprock, New Mexico, disposal site. To ensure that an effective and efficient approach is used to monitor groundwater and surface water at the site, DOE-LM will reduce the sampling frequency at all locations from semiannual (March and September) to annual (September). The report *Optimization of Sampling at the Shiprock, New Mexico, Site* (March 2013) presents the basis for annual sampling at the site. DOE-LM previously transmitted this report for U.S. Nuclear Regulatory Commission review.

The July 2002 *Final Ground Water Compliance Action Plan for Remediation at the Shiprock, New Mexico, UMTRA Site* (GCAP) allowed for sampling to change from semiannual to annual in 2010 (Appendix B). The GCAP requires semiannual monitoring for the initial 7 years of remediation (i.e., after active pumping began in 2003), followed by annual monitoring for the next 5 years, then monitoring every 5 years thereafter. The seventh year of semiannual monitoring was in 2009, and monitoring frequency could have been reduced to annual starting in 2010. However, because stakeholders had expressed concerns about the compliance strategy, and enhancements to the remediation system required additional data, DOE-LM elected to continue sampling semiannually. Sampling locations include the locations required by the GCAP plus numerous additional locations.

DOE-LM will continue to monitor all sampling locations required in the GCAP along with additional locations on an annual basis. DOE-LM has demonstrated that annual sampling will provide sufficient data to support the current compliance strategies for the site and maintain protection of human health and the environment. Consequently, DOE-LM requests your concurrence with this proposal to reduce the monitoring frequency from semiannual to annual monitoring at the Shiprock, New Mexico, disposal site, beginning with the planned September 2014 monitoring event, consistent with the approved GCAP.

FSME20



September 9, 2014

Please call me at (970) 248-6018 if you have any questions. Please send any correspondence to:

U.S. Department of Energy
Office of Legacy Management
2597 Legacy Way
Grand Junction, CO 81503

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Kautsky", with a stylized flourish at the end.

Mark Kautsky
Site Manager

cc:

D. Orlando, NRC
M. Roanhorse, NN UMTRA/AML
S. Austin, NN EPA
D. Taylor, NN DOJ
R. Bush, DOE (e)
S. Campbell, Stoller (e)
D. Miller, Stoller (e)
File: SHP 400.02(A) (rc-grandjunction)



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Sites\Shiprock\9-3-14 Request to NRC Change Monitoring Frequency