

Author: Joe Virgona at DOEGJPO  
Date: 12/3/96 2:03 PM  
Priority: Normal  
TO: Sharon Arp at UMTRA  
CC: Charles Jones  
CC: Carl Jacobson  
CC: Mark Plessinger  
Subject: GUN LTSP

GUN



----- Message Contents -----

Sharon,

Below are our comments on the Gunnison LTSP comments from NRC. Also, please send me a copy of the information referenced in comment #1. It will help us understand better any rock issues early on and also may help us with Lakeview.

If you have any comments, please contact Charles directly.

thanks

joe

RECORD

----- Forward Header -----

Subject: GUN LTSP  
Author: Charles Jones at DOEGJPO  
Date: 11/27/96 12:57 PM

A Nov. 21 letter from J. Holonich to R. Sena contains comments of NRC reviewer H. Lefevre on the draft GUN LTSP. Item 8, which refers to Plate 1, is a concern to GJO. The NRC reviewer and the LTSP author are unaware of current site inspection procedures and the recently adopted, short inspection report format. Plate 1 does not play a significant role in either. Specifically:

"Plate 1 will serve as the baseline for preparing the site inspection map."

No, not really. Plate 1, from the LTSP, is used to create a CAD file. GJO uses the CAD file to create figure(s), as necessary, for the inspection report. But inspection reports no longer contain a Plate 1 (for cost reduction) unless special circumstances at the site warrant an oversize drawing of the entire site.

"The inspection team will annotate copies of the site inspection map during site inspections."

GJO does not do this anymore. It is awkward and inefficient. Field notes are sometimes written on the photograph log or in the little orange notebook, or not at all. GJO is beginning to use small tape recorders for field notes, and this is working very well indeed. The choice is solely the inspector's. So, use of Plate 1 for field notes is only one among several options. LTSPs should not attempt to establish procedures. Procedures change too often.

"The annotated site inspection map must include the following information: [5 bullets follow]"

Since there are no longer 'annotated site inspection maps', it is misleading and inaccurate to suggest to the regulator that they do, or

GUN 030.02  
GUN 07.00

; that certain information "must" be found on them.

To avoid misrepresentation, Section 3.6.2 should be deleted. Plate 1 -- after GJO has its CAD file for a site -- is not the important document this section implies that it is. We carry a Plate 1 with us, of course, for general orientation; but seldom does it become a record of the inspection.

To reflect honestly and accurately what DOE actually does during an inspection -- and later with the inspection report -- we recommend:

1. Delete Section 3.6.2 entirely from the LTSP. If this section isn't deleted now, while the LTSP is in draft stage, GJO will have to do so later at unnecessary cost.

2. Incorporate the 5 bullets of Section 3.6.2 in Section 3.6.5 Site Inspection Report. That is where the NRC will find the information identified by the bullets.

3. Respond to the NRC reviewer's comment by pointing out that DOE does not inspect by "traverses" but by areas (transects) and that these are identified, usually in a figure, in the inspection report.

n important role.

Apparently Section 3.6.2 in the most recent draft LTSP states or implies that "Plate 1" will be annotated by the DOE inspection team to include traverses made during the course of the annual inspection.

4. DISCUSSION: The proposed concentration limits for hazardous constituents presented in Table 2.3, page 2-21, included some values that have increased substantially from those that were proposed in the RAP and reiterated in the Staff's TER, i.e., arsenic, net gross alpha, radium-226/228, antimony, tin, vanadium, and zinc.

COMMENT: Discuss the basis for these increased limits, including clarification of what additional background data was used to modify the values. This information does not have to be included in the LTSP. It should be provided as additional information supporting changes from what was presented in the RAP.

INTERESTING!

5. DISCUSSION: The TER indicated that in the LTSP, DOE should address the need for sampling any observed water along the existing gullies. The LTSP did not include any discussion on this subject.

COMMENT: The LTSP should be revised to include, either in the checklist or in the "site-specific concerns" section, discussion on checking adjacent gullies for seepage and sampling any seepage observed.

6. DISCUSSION: The LTSP (page A1-1) acknowledges that: (1) the final disposal site will consist of approximately 92 of the roughly 115 acres transferred on June 15, 1992, to the DOE by the Secretary of the Interior by means of 43 CFR Public Land Order 6931, and (2) that the legal description of the final disposal site will be included in the revised LTSP subsequent to completion of the final site survey.

COMMENT: Provide the legal description of the final disposal site in the revised LTSP.

7. DISCUSSION: The LTSP Baseline Map (Plate 1) indicates that the map is in draft form pending completion of the final site survey.

COMMENT: Provide the final Baseline Map in the revised LTSP.

8. DISCUSSION: LTSP Section 3.6.2 (Site inspection maps) indicates that the map (Plate 1) will be annotated by the inspection team to include traverses made during the course of the annual inspection.

COMMENT: Revise the LTSP to ensure that the locations of the traverses are indicated on the inspection drawing accompanying the completed annual inspection report.

More work  
for us



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 21, 1996

Mr. Richard Sena, Acting Director  
Environmental Restoration Division  
Uranium Mill Tailings Remedial Action  
Project  
U.S. Department of Energy  
2155 Louisiana NE, Suite 4000  
Albuquerque, NM 87110

SUBJECT: LONG-TERM SURVEILLANCE PLAN FOR THE GUNNISON, COLORADO, URANIUM MILL  
TAILINGS REMEDIAL ACTION PROJECT DISPOSAL SITE

Dear Mr. Sena:

The U.S. Nuclear Regulatory Commission staff has reviewed the U.S. Department of Energy's (DOE) long-term surveillance plan (LTSP), dated May 1996 for the Gunnison, Colorado, disposal site. The LTSP was transmitted by a letter of June 13, 1996. Comments are enclosed that have been developed based on the staff's review.

If you have any questions regarding this subject, please contact the NRC Project Manager, Harold E. Lefevre, at (301) 415-6678.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Holonich", with a small flourish underneath.

Joseph J. Holonich, Chief  
Uranium Recovery Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: As stated

cc: S. Arp, DOE A1b  
S. Hamp, DOE A1b  
J. Virgona, DOE GJPO  
E. Artiglia, TAC A1b

### 3.6.2 Site inspection maps

Plate 1 will serve as the baseline for preparing the site inspection map. The inspection team will annotate copies of the site inspection map during site inspections. The annotated site inspection map must include the following information:

- Inspection traverses.
- Photographic locations.
- Locations and descriptions of any new, anomalous, or unexpected features.
- Features identified during previous inspections for observation or monitoring.
- Inspection date and type of inspection.

### 3.6.3 Site inspection photographs

A photographic record of the site inspection must be maintained. Site conditions should be documented by ground photographs to record developing trends and to enable the DOE to make decisions concerning additional inspections, custodial maintenance or repairs, or corrective action. If possible, any site feature or condition requiring inspectors to make a written comment, explanation, or description will be photographed. A site inspection photo log will be used to record the photographs. A separate photo log should be completed for each roll of exposed film, with an entry for each photograph.

At a minimum, the site features listed in the long-term surveillance guidance (DOE, 1996) should be documented with photographs during site inspections. In addition, any new or potential problem areas identified during a site inspection must be well documented with photographs. All site inspection photographs, as well as all corresponding photo log forms, will be maintained in the permanent site file.

### 3.6.4 Field notes

The inspection team will use field notes to record observations made during the inspection but not recorded on the inspection checklist or inspection map. The field notes will become part of the permanent site file.

### 3.6.5 ) Site inspection report

After every site inspection, the DOE will prepare a site inspection report that discusses scope of the inspection, observations made, and conclusions drawn from the inspection. At a minimum, the inspection report will include

- Description of the site conditions.
- Completed site inspection checklists and any relevant supporting documentation, including names and qualifications of the field inspectors.