



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

March 1, 2018

Ms. Bernadette Tsosie, Site Manager
U.S. Department of Energy
Office of Legacy Management
2597 Legacy Way
Grand Junction, CO 81503

**SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION (NRC) STAFF REVIEW OF THE
U.S. DEPARTMENT OF ENERGY'S RESPONSES TO NRC COMMENTS ON
THE DRAFT GROUNDWATER FLOW MODEL FOR THE TUBA CITY,
ARIZONA, DISPOSAL SITE (Docket Number WM-00073)**

Dear Ms. Tsosie:

I am writing in response to Richard Bush's letter, dated April 26, 2017, providing the U.S. Department of Energy's (DOE's) responses to the U.S. Nuclear Regulatory Commission (NRC) staff's comments on the draft Groundwater Flow Model for the Tuba City, Arizona Disposal site (Agencywide Documents Access and Management System (ADAMS) Accession Number ML17118A155). DOE will use the Groundwater Flow Model to develop information necessary to develop a Groundwater Corrective Action Plan (GCAP) for the Tuba City site. When the DOE has developed the GCAP, the NRC will review the GCAP and provide comments to the DOE or, if appropriate, concur on the GCAP. The NRC staff has been reviewing and providing comments on the documents the DOE is developing to support the draft GCAP, such as the draft Groundwater Flow Model, because it is more efficient to review the supporting documents as they are developed, instead of waiting until DOE submits the GCAP.

The NRC staff reviewed the draft Groundwater Flow Model and provided our comments on March 28, 2016 (ADAMS Accession Number ML16075A139). The NRC staff has reviewed the DOE's responses and has determined that the DOE provided adequate responses to comments 9, 11, 17 and 18. We will review the next revision of the modeling report to determine the status of our remaining comments. In several responses, DOE referenced technical reports that support technical assumptions associated with the groundwater flow model. DOE offered to provide NRC with an electronic version of a 2013 report entitled, "Draft Remedial Investigation Report, Tuba City Dump Site, Tuba City, Arizona." Please provide this report and a copy of the succeeding final report from 2015 entitled, "Final Remedial Investigation Report, Tuba City Dump Site, Tuba City, Arizona" or a weblink to these reports.

In the section entitled, "*Path Forward for Comment Resolution*," DOE stated "Future data collection efforts and model runs will be designed to address the range of issues and concerns expressed." DOE also stated that additional data will be collected and that future analytical activities will be used to support the next iteration of groundwater model development and will be documented in a future revision of the report. The NRC staff looks forward to reviewing the future revision of the groundwater flow model report when it is available.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning the NRC review of the report, please contact me at 301-415-6749 or by email at Dominick.Orlando@nrc.gov.

Sincerely,

/RA/

Dominick A. Orlando, Senior Project Manager
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

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