



Department of Energy

Washington, DC 20585

January 3, 2019

Mr. Dominick A. Orlando
Senior Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop T8F5
Washington, DC 20555-0001

Subject: Draft Seep Monitoring Evaluation Report, Mexican Hat, Utah, UMTRCA Title I Disposal Site (NRC Docket No. WM-0063)

Dear Mr. Orlando:

Enclosed are two copies of the draft "Seep Monitoring Evaluation Report, Mexican Hat, Utah, UMTRCA Title I Disposal Site" for review and comment. The report presents the results of recent and historical seep monitoring at the Mexican Hat, Utah, Uranium Mill Tailings Radiation Control Act (UMTRCA) Title I Disposal Site and provides an evaluation of the need for continued seep monitoring. In accordance with the U.S. Department of Energy (DOE) Long-Term Surveillance Plan (LTSP) and draft Groundwater Compliance Action Plan for the site, a combination of observational seep monitoring and intermittent groundwater quality monitoring has been performed at the site as a best management practice since 1998.

The *Resolution of Seep and Ground Water Monitoring at the Mexican Hat, Utah, UMTRCA Title I Disposal Site* report (2006) resulted in concurrence by the U.S. Nuclear Regulatory Commission, DOE, and the Navajo Nation that further seep and groundwater quality monitoring at the site was not warranted, and all groundwater monitoring wells at the site were abandoned in 2007. Additionally, it was agreed the utility of collecting water quality samples at seeps would be reevaluated if observed seep flows were to significantly increase relative to historical levels. However, in accordance with the 2007 LTSP, seven seep locations were designated for visual observational monitoring during annual site inspections for a minimum 10-year period.

The 2007 LTSP required annual visual observations of the seven designated seep locations through 2016, at which time an evaluation was to be conducted to determine whether to continue or discontinue visual seep monitoring; the enclosed report provides that evaluation. Additionally, observational seep monitoring was performed during the 2017 and 2018 annual inspections.

Based on observations that the seeps are nearly all dry and there is no significant human or environmental health risks associated with the seeps, there is no need to resume water quality monitoring of seeps at the site. Visual observations, photographs, and qualitative flow estimates will continue to be made during annual site inspections to document seep conditions; the need to continue long-term visual monitoring of the seeps may be revisited in the future. Upgradient background Seep 0261 is proposed to be removed from the annual visual monitoring program. The utility of collecting water quality samples at groundwater seeps may be reevaluated if observed seep flows appreciably increase in the future.



This report should be used for official use only since it is considered a draft document. As such, the draft report should not be made publicly available. Once comments are received, the report will be finalized and made publicly available on the DOE Office of Legacy Management website.

Please contact me at (970) 248-6621 or at Angelita.Denny@lm.doe.gov 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 'Angelita Denny', with a long, sweeping horizontal stroke extending to the right.

Angelita Denny, Site Manager
Office of Legacy Management

Enclosure

cc w/enclosure:

M. Roanhorse, NN AML/UMTRA
M. Kautsky, DOE-LM (e)
A. Kleinrath, DOE-LM (e)
E. Tyrrell, Navarro (e)
DOE Read File
File: HAT 0410.02 (records)