



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

March 4, 2019

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

**SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF REVIEW OF THE
"DRAFT LONG-TERM SURVEILLANCE PLAN FOR THE NATURITA,
COLORADO, DISPOSAL SITE" (Docket No. WM-66)**

Dear Ms. Denny:

I am writing to in response to the U.S. Department of Energy report entitled "Draft Long-Term Surveillance Plan [LTSP] for the Naturita, Colorado, Disposal Site" dated February 2018, (Agencywide Documents Access and Management System (ADAMS) Accession Number ML18037A720). The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the draft revised LTSP and has two comments:

1. In Section 2.1.1, Site Ownership, the revised LTSP states that Appendix B includes documentation for two agreements that enable access to portions of the site. The first agreement, made with UMETCO Minerals Corporation, is for access to the west toe drain outlet, also known as the diversion channel. This agreement was executed on May 15, 2011. The second agreement, made with the Bureau of Land Management, is for a right-of-way for the east and west toe drains, also known as the storm waste drainage structures. The second agreement listed was executed on March 18, 2003. Both of these agreements were made after the original LTSP was approved for the Naturita, Colorado Disposal Site; however, they are not included as listed revisions and the need for them was not discussed in the revised LTSP. Please provide the rationale for including the rights-of-way in the final LTSP.
2. Section 3.5.5 contains several bullets listing the NRC Office, Division and Directorate which will be notified if there is a Priority 1 or 2 event. The names of the NRC Office, Division and Directorate have been changed since the LTSP was approved. To avoid this issue in the future, NRC staff would therefore recommend that the revised LTSP just state that the appropriate NRC offices will be contacted. For example, the last sentence of the section could state ".... and will notify appropriate offices at the NRC."

In accordance with 10 CFR 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 Web site at

<http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning the NRC comments please contact me at 301-415-0708 or at elise.striz@nrc.gov.

Sincerely,

/RA/

Elise Striz, Hydrogeologist
Uranium Recovery and Materials
Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket No.: WM-00066

cc: Naturita CO Disposal Site dist. List

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF U.S. NUCLEAR
REGULATORY COMMISSION STAFF REVIEW OF THE "DRAFT LONG-TERM
SURVEILLANCE PLAN FOR THE NATURITA, COLORADO, DISPOSAL SITE"
(Docket No. WM-66) **DATE March 4, 2019**

R. Evans RIV

T. Pruett, RIV

ADAMS Accession No.: ML19057A496*** via email**

OFFICE	DUWP	DUWP	DUWP	DUWP
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