

DEC 15 1992

Mr. Albert R. Chernoff, Project Manager  
 Uranium Mill Tailings Remedial Action  
 Project Office  
 U.S. Department of Energy  
 Albuquerque Operations Office  
 P.O. Box 5400  
 Albuquerque, New Mexico 87115

Dear Mr. Chernoff:

Your letter of February 13, 1992, enclosed for our review, the draft Long-Term Surveillance Plan (LTSP) for the Lowman, Idaho, Uranium Mill Tailings Remedial Action Project site. Our comments are detailed in the enclosure. We have not received a Completion Report from the Department of Energy (DOE) for Lowman. When the Nuclear Regulatory Commission concurs in the completion of the remedial action, and the comments on the draft LTSP are resolved, NRC staff will be prepared to bring the Lowman site under the general license in 10 CFR Part 40.27, by providing written acceptance of the LTSP.

Through recent review of various LTSPs, the staff has observed that certain comments have been raised in more than one review. DOE should be aware of changes made to individual LTSPs that should generically apply to other LTSPs, as they are prepared in the future.

If you have any questions regarding these comments, please feel free to contact me at FTS 8-301-504-3439, or Allan Mullins, of my staff, at FTS-8-301-504-2578.

Sincerely,

(SIGNED) JOHN J. SURMEIER  
 John J. Surmeier, Chief  
 Uranium Recovery Branch  
 Division of Low-Level Waste Management  
 and Decommissioning  
 Office of Nuclear Material Safety  
 and Safeguards

Enclosure: As stated

cc: S. Hamp, DOE Alb  
 W. Woodworth, DOE Alb

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PDR YES ☒ NO ☐ Category: Proprietary ☐ or CF Only ☐  
 ACNW YES ☒ NO ☐

SUBJECT ABSTRACT: NRC REVIEW OF THE LOWMAN, IDAHO UMTRA SITE - LTSP

OFC	LLUR	E	LLUR	E	LLUR	E
NAME	AMullins/eb		DGMlen		JSurmeier	
DATE	12/15/92		12/15/92		12/15/92	

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COMMENTS ON LONG-TERM SURVEILLANCE PLAN  
LOWMAN, IDAHO SITE

1. Pg. 1, Section 1.3. The date for completion of the remedial action in the 3rd line should be shown without a question mark.  
  
Pg. 1, Section 1.3. In the 7th line of this section, the parenthetical reference to NRC concurrence should be deleted. NRC concurrence is not required for land transfer.
2. Pg. 3, Section 1.4. The first sentence of this section is incorrect, and should be replaced with the following: "Title I of the UMTRCA requires that Lowman and the other UMTRA Project permanent disposal sites be maintained pursuant to a license issued by the NRC. To this effect, the NRC has established, in 10 CFR Part 40.27, a general license for custody and long-term care of residual radioactive material disposal sites."
3. Pg. 3, Section 1.5. The list of required items to be covered by the LTSP should include "site inspection procedures", "inspection personnel qualifications," and "emergency response."
4. Pg. 3, Section 1.5. In the 1st full paragraph, the reference to the DOE generic document should be corrected to read "Guidance for Implementing the UMTRA Project Long-Term Surveillance Program," September 1992. The list of references on Pg. 55 should be revised accordingly.  
  
Pg. 10, Section 2.3. The reference to the Guidance document should be revised as specified above.
5. Pg. 15, Figure 2.9 The statistical details for the site need to be added to the illustration.
6. Pg. 21, Section 2.5.1. The date for the photos should be shown without a question mark.
7. Pgs. 33 and 35, Section 3.5.1. The qualifications requirements for water samplers lists a Bachelor of Science degree or equivalent, and training in OSHA health and safety, and CPR, and first aid. If college training in specific fields is intended, they should be listed.
8. Pg. 35, Figure 3.2. This figure shows two existing and two proposed POC wells, while the text discusses monitoring only two POC wells. These additional POC wells should be installed before submitting the Completion Report, and the LTSP should be revised to reflect the final conditions described in the Completion Report.

Enclosure

9. Pg. 42, Section 4.1.3. 5th line indicates that a site inspection check list will be developed during the closeout inspection. This should be provided in the final LTSP.
10. Pg. 45, Section 4.3.1. This section indicates that a "report of intrusion by humans or livestock" might be a trigger event for a contingency inspection. The site is not fenced, and such intrusions could be common. The section should be revised to consider the site-specific conditions which might trigger a contingency inspection and the type of damage to the site that would be expected and investigated.
11. Pg. 45, Section 8.0. This section states that quality assurance procedures will be developed by the Grand Junction Projects Office. The LTSP for the Spook, Wyoming, disposal site which was recently reviewed by NRC staff, included a list of activities which will be covered by quality assurance procedures. This list should be included in the Lowman LTSP.
12. Attachments 1, 2, and 4 are not included.