

May 23, 1981

Troy B. Conner, Jr., Esq.  
Conner, Moore & Corber  
1747 Pennsylvania Avenue, N.W.  
Suite 1050  
Washington, DC 20006



In the matter of  
U.S. Ecology, Inc.  
(Sheffield, Illinois Low-Level  
Radioactive Waste Disposal Site)  
Docket No. 27-39

Dear Mr. Conner:

This responds to your letter of April 21, 1981, to Edward F. Hawkins of the low-level waste licensing branch in which you assert that his March 27 letter provides no technical basis for the conclusion that U.S. Ecology's trench capping proposal is deficient. If U.S. Ecology would provide the technical data used in its development of the trench capping proposal, the Staff will conduct a full evaluation of the proposal. The type of information that is needed for the NRC Staff to evaluate this proposal on its technical merits is set forth in Attachment A.

In your letter you also suggest the possibility of a meeting to discuss the license conditions. As the Staff noted in its March 27 letter, we agreed to review the site closure conditions to determine whether any revisions may be warranted due to the existence of technical data which was not available when the conditions were originally developed. We are presently involved in this review. Upon completion of this review in the near future, we plan to meet with U.S. Ecology and the State of Illinois to discuss these site closure conditions.

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Finally, in the Staff's March 27 letter we requested that you direct any questions you may have to Staff counsel. As an NRC Staff attorney, I am requesting that all future questions be directed to Staff counsel.

Sincerely,

Henry J. McGurren  
Counsel for NRC Staff

Attachment  
As Stated

cc w/attachment: Andrew C. Goodhope, Esq.  
Jerry R. Kline  
Dr. Forrest J. Remick  
Scott Hadson, Esq.  
D.J. McRae, Esq.  
Cornelius J. Hollerich, Esq.  
Kenneth G. Anspach, Esq.  
John H. Cannon, Esq.  
Robert Russell, Esq.  
Mark J. Wetterhahn, Esq.  
Admiral Vincent P. de Poix  
Mr. Charles F. Eason  
Atomic Safety and Licensing Board Panel  
Atomic Safety and Licensing Appeal Board  
Docketing and Service Section

Dist  
NRC Central  
LPDR  
Shapar/Engelhardt  
Christenbury/Scinto  
Reis  
McGurren  
Chron(2)  
FF(2)  
Lessy  
Dewey  
DSmith  
KDragonette  
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### Attachment A

List of technical information required to evaluate U.S. Ecology proposal for closure Condition 8 (submitted February 10, 1981)

1. Soil testing procedures used to ensure proper compaction of subgrade.
2. Procedures for dewatering "soft soil pockets."
3. Definition of "clayey soil" using a standard engineering classification system.
4. Thickness in inches or c.m. of the thin soil layers alluded to in the proposal.
5. Method and level of compactive effort for clay soil strata.
6. Method of placement, compaction and grading of the "additional three feet of soil" alluded to in the proposal.
7. Final grading and drainage plan for trenches to receive this treatment.
8. Procedures to be employed for preparing surface for seeding, seeding, holding seed in place.
9. Erosion protection techniques during time required for germination and establishment of root zone.
10. Methods to be employed to make surface resistant to dessication cracks and frost action.
11. Permeability tests for soils to be used in compacted clay zone and in cover soil zone.

12. Analyses which demonstrate that the implementation of the process described by U.S. Ecology will yield less surface water infiltration than is presently experienced in the vicinity of trenches.
13. Analyses that demonstrate that implementation of the process described by U.S. Ecology will render trenches less susceptible to subsidence than they are presently.