

WM Record File

WM Project 39

Docket No.

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MEMORANDUM FOR: R. E. Browning, Director
Division of Waste Management

FROM: Leo B. Higginbotham, Chief
Low-Level Waste and Uranium
Recovery Projects Branch
Division of Waste Management

SUBJECT: PROGRESS REPORT ON THE STATUS OF UMTAP:
FEBRUARY 1, 1985 - MAY 31, 1985

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GENERAL ITEMS:

In an effort to increase efficiency and reduce duplication of effort, DOE and NRC embarked on the establishment of a working agreement with regard to functioning in the UMTRA Program. This document was initially generated by DOE, and a draft copy was sent to NRC on December 20, 1984. NRC and DOE met on February 20, 1985 to discuss concerns with this Memorandum of Understanding (MOU). An NRC and DOE working session was held February 28-March 1, 1985 in Albuquerque, New Mexico. DOE sent the final version of the MOU to NRC on May 21, 1985.

As part of the preparation process for licensing UMTAP sites, NRC and DOE are jointly developing completion, monitoring, maintenance and surveillance criteria to be used for post remedial action care. The UMTRA Project Surveillance and Maintenance (M&S) Plan was received by NRC on April 5, 1985. NRC/HQ and URFO staff are reviewing the plan and expect to provide comments to DOE by early June. DOE is holding the UMTRA Licensing Plan until details in the M&S plan can be reviewed. DOE is also expecting to submit a certification plan to NRC by early summer.

DOE holds meetings throughout the year to keep the States and Indian Tribes informed of the progress in UMTAP. These meetings also provide a forum for the States and Tribes to air any issues on their specific sites or regarding the program in general. The most recent meeting was held in San Antonio, Texas on February 26-27, 1985. The most noteworthy announcement was the acceleration of certain Indian sites' (Mexican Hat, Monument Valley, Tuba City) schedules, as well as for Ambrosia Lake.

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One of the most consistently difficult areas in the NRC review of NEPA and remedial action plan (RAP) documentation is the ground-water resources sections. In an effort to resolve some of the generic concerns in these documents, NRC and DOE participated in a meeting to investigate options for improving the overall ground-water analysis justifications in UMTRAP documents on March 26, 1985. A level of mutual understanding was reached, as a result of that meeting (Enclosure 1).

Some of the construction difficulties with the high priority sites have led DOE to postpone further construction at these sites and to accelerate the remedial action schedules at lesser priority sites. DOE determined that it would be more efficient to proceed with remedial action in this manner, since these lesser priority sites are not expected to have the complications experienced at Canonsburg, Salt Lake City and Shiprock. To facilitate NRC's review and effort, DOE arranged a series of site visits during the week of May 6, 1985. These sites were described during the DOE/States/Tribes February Status meeting as being on an accelerated schedule. The Shiprock site was also visited.

NRC and DOE participated in an UMTRAP Management meeting May 29, 1985 to discuss the progress of NRC and DOE coordination in UMTRAP. NRC and DOE discussed the MOU implementation and other mechanisms for improving the way we do business. Further meetings are being scheduled to provide a better understanding of the problems both agencies face in accomplishing their mission in UMTRAP.

The NRC is continuing to streamline its procedures in executing its role in UMTRAP. One immediate area of focus is the development of Standard Review Plans so that the reviews remain consistent, even with changes in staff. Work on standard review plan (SRP) development for UMTRAP has begun, and drafts should be available in the early fall. Areas being covered are: Erosion protection, geotechnical stability, ground-water resources and radon attenuation.

STATUS OF SPECIFIC UMTRAP PROCESSING SITES

Canonsburg, PA: Construction has progressed to near completion of the liner and capillary break layer. DOE has requested that NRC personnel visit the site prior to the completion of this milestone. S. Smykowski (WMEG) and W. Dam (WMTG) visited the site operations May 16-17, 1985 for this purpose. The Division of Waste Management has been reviewing several RAP modification requests and has provided recommendations to the Division of Fuel Cycle during the week of May 20, 1985. DOE and NRC have participated in a meeting to resolve concerns regarding these modifications on March 27, 1985.

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Riverton, WY:

NRC provided comments to DOE on the draft RAP on February 2, 1985. DOE requested urgent (less than 1 week) NRC review of the revised EA Hydrology Appendix. NRC complied and held a meeting with DOE and their contractors on May 1, 1985. Further measurements and monitoring at the Riverton site are being conducted by the DOE in May. The Riverton final RAP is expected for NRC review and concurrence in early June. Since outstanding analyses are still being conducted, NRC expects to provide a conditional concurrence at best.

Lakeview, OR:

DOE submitted the Draft EA and RAP for NRC review in mid-March. However, the absence of essential collateral documents delayed any effective review until the second week of April. NRC/HQ, URFO and DOE staffs met May 20, 1985 to discuss the NRC's initial comments and concerns. Final comments are expected to be sent to DOE by the end of June. Due to schedule pressure, DOE has already published the final EA on May 1, 1985.

Salt Lake City, UT :

Division of Waste Management (WM) completed the Technical Evaluation Memorandum (TEM) documenting the NRC review and decision on the conditional concurrence with the Remedial Action Plan (RAP). Outstanding issues have been seismology and rock sizing at the Clive disposal site. NRC staff visited the site on April 18, 1985 to observe contractor operations. Train transport of the tailings to Clive is expected to begin early July.

Shiprock, NM:

NRC is reviewing revisions to the RAP, as well as changes in the construction specifications. Staff observed construction at the site during the week of May 6, 1985. Remaining open issues are: seismicity, rock sizing, water quality and radon barrier design. The Remedial Action Inspection Plan and the Health Physics Monitoring Plan were received for NRC review on April 30, 1985, and comments were sent to DOE by letter dated May 20, 1985.

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Grand Junction, CO: A meeting was held in Denver, Colorado State Offices to discuss options for stabilization of the tailings at Grand Junction. Erosion protection questions were revised regarding the preferred alternative-disposal at Cheney Reservoir. Co-disposal with the Rifle tailings has been eliminated as an option.

Durango, CO: URFO comments on the draft EIS were forwarded to DOE in mid-February. The draft RAP is expected in June. Local residents have pressured DOE to reconsider stabilization in place (SIP). Senator Hart conducted a meeting in Durango on March 9, 1985 to hear comments from interested parties.

Gunnison, CO: NRC provided comments to DOE on the draft EA and RAP on March 8, 1985. As a result of concerns expressed by local citizens, DOE has decided to re-evaluate the SIP preferred option for remedial action and has had to revise the schedule for this site.

Rifle, CO: Co-disposal with the Grand Junction tailings is no longer being considered. DOE is proceeding with another alternate site selection process.

Accelerated Sites: Mexican Hat, Tuba City, Ambrosia Lake and Monument Valley have been moved up in the schedule. NRC will be receiving documents as early as October, 1985.

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Leo B. Higginbotham, Chief
Low-Level Waste Management
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Enclosure:
Points of Agreement of UMTRAP Hydrogeology

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POINTS OF AGREEMENT

DOE/TAC/NRC MEETING ON LIMTRAP HYDROGEOLOGY
MARCH 26, 1985

1. Background water quality is the water quality that existed prior to uranium recovery (see AEA for definition of uranium recovery).
2. Objectives and limitations of modeling and characterization programs should be clearly stated; modeling should be based on appropriate data.
3. NRC has no objections to DOE's proposed rule-of-thumb approach for characterization of background groundwater quality, which utilizes an inventory of existing water wells and springs, and three (3) upgradient wells per groundwater-bearing unit.
4. Chemical concentrations within plumes should be defined spatially using isopleth maps for selected constituents, as appropriate; hydrogeologic cross-sections should be included in evaluations, as appropriate.
5. The actual extent of water contamination can be useful in estimating future contaminant migration on a site-specific basis.
6. It is of critical importance to build a defensible case in evaluating feasible aquifer restoration/protection alternatives (e.g., matrix approach).
7. In all hydrogeologic evaluations, try a reasonably conservative, defensible approach first, in lieu of complicated analysis.

Signed on March 26, 1985 by the following:

Michael F. Weber (NRC)
John Thackston (TAC)
Giorgio Gnugnali (NRC)
E. F. Hawkins (NRC)
David Ball (DOE)