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MEMORANDUM FOR: Myron H. Fliegel, WMGT  
Division of Waste Management

FROM: Michael F. Weber, WMGT  
Division of Waste Management

Mark Larson, WMGT  
Division of Waste Management

SUBJECT: NRC/TAC MEETING ABOUT HYDROGEOLOGIC CHARACTERIZATION  
OF THE MEXICAN HAT AND MONUMENT VALLEY UMTRAP SITES

On Wednesday, June 12, 1985, we met with Bill Mason, John Thackston, and John Dupuy of DOE's Technical Assistance Contractor (TAC) and Mark Haisfield (NRC) to discuss proposed hydrogeologic characterization of the Mexican Hat and Monument Valley UMTRAP sites. Preliminary characterization of the sites indicated potential contamination of shallow groundwater downgradient of both sites. The proposed characterization activities are intended to characterize this contamination and develop the kinds of information necessary to comply with EPA's guidance in Subpart C of 40 CFR Part 192. This memorandum documents our response to the TAC representatives at the meeting.

The TAC's specific purpose for the meeting was to present the proposed characterization activities and ask NRC whether these activities appeared to be reasonable based on available information. As depicted in the enclosures, the proposed activities include the installation of approximately 10 additional wells at Mexican Hat and approximately 15 additional wells at Monument Valley. Most of the meeting focused on optimal locations for these new wells. The TAC stated that well locations will be adjusted following our meeting to optimize the value of information to be collected from the wells.

At the conclusion of the meeting, we stated that the proposed characterization activities constituted a reasonable approach based on information available to us at this time, but that additional characterization may be necessary depending on analyses of results obtained from the new wells or other sources. The TAC recognized the potential need for an iterative approach for site characterization and stated that they will make their best effort to prepare a defensible evaluation for comparison against the EPA standards. The TAC also agreed to provide NRC with copies of the proposed Statements of Work (SOW's) and data files consisting of site-specific hydrogeologic information that the TAC has collected at these sites and the Tuba City UMTRAP site.

As a follow-up activity for internal consideration, the TAC asked for our comments on their hydrogeologic evaluation of the Lakeview UMTRAP site. They

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consider this evaluation to be a prototype approach for hydrogeologic evaluations of other UMTRAP sites and asked if URFO's approval of the approach would constitute generic acceptance. We responded that WMGT had not reviewed the Lakeview evaluation because the technical reviews were performed by URFO and that URFO's approval of the Lakeview approach would not necessarily constitute acceptance for other UMTRAP sites reviewed by the technical staff in WMGT. In light of the TAC's generic interest in NRC's comments on the Lakeview approach, we should consider performing a technical review of the approach.

If you have any questions about our meeting with the TAC, please contact us.

Enclosure:

Maps of Existing and Proposed Wells

Enclosures available in DCC.

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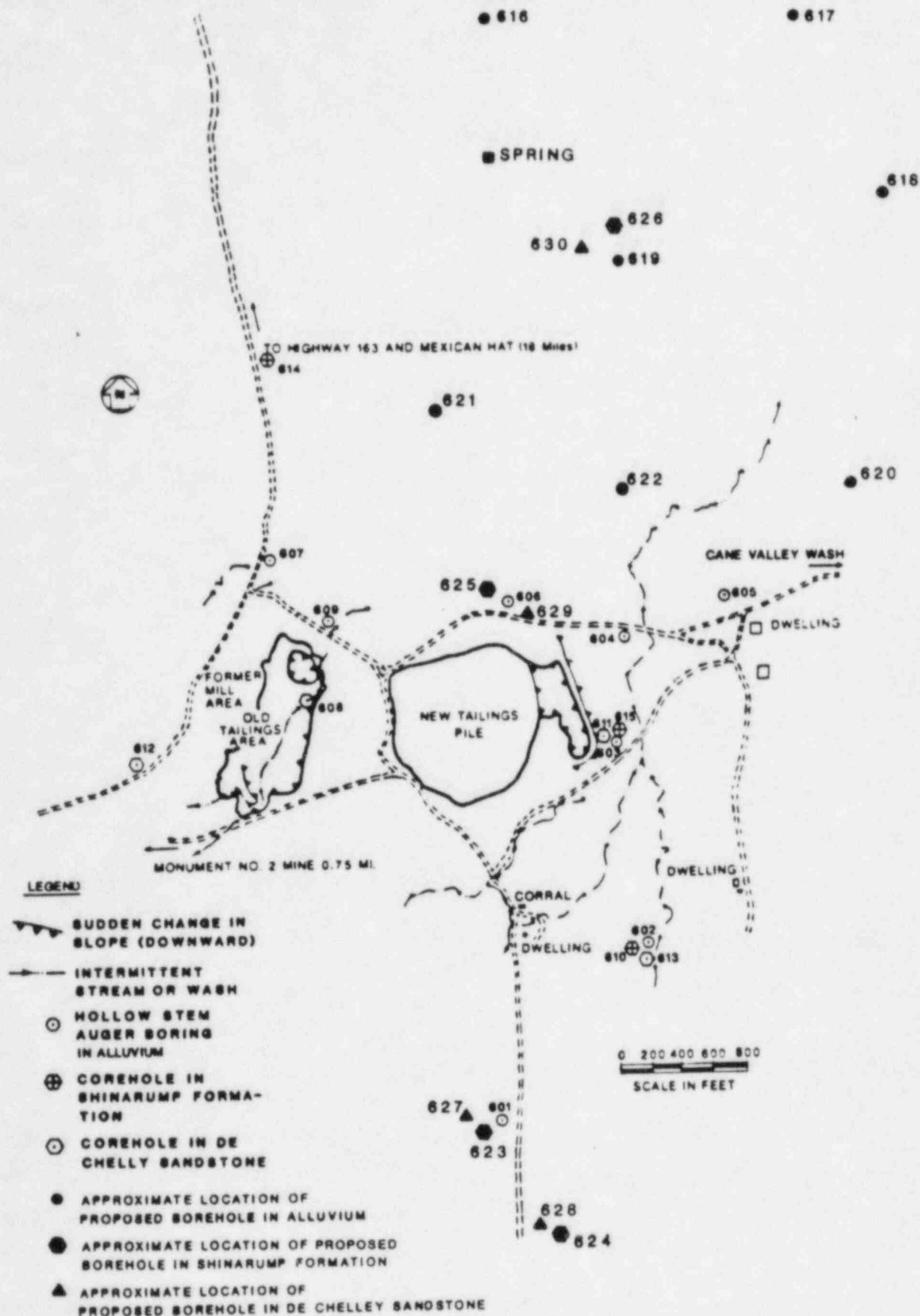
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ENCLOSURE A



FIGURE 6

- PROPOSED MONITOR WELL LOCATIONS
- EXISTING MONITOR WELL LOCATIONS



**FIGURE 6**  
**MONUMENT VALLEY SITE MAP WITH EXISTING & PROPOSED**  
**MONITOR WELL LOCATIONS**