

40-8907



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

~11/8/96

Mr Ken Hooks  
Project Manager, UNC Church Rock Site  
Nuclear Regulatory Commission  
Mail Stop T7J9  
Washington D.C. 20555-0001

Dear Mr Hooks:

The following are the comments for the Technical Evaluation Report by NRC on UNC's Five Year Review:

**South West Alluvium**

- EPA, NMED and NSF agree that remediation standards for sulfate, nitrate and TDS need to be re-evaluated. We also agree that attaining final remedial standards for these constituents may be difficult because the chemical equilibrium will change with continuing decline in water levels in the alluvium.
- We do not believe it is appropriate to eliminate any standards at this time. This matter can be handled after EPA's Five Year Review, with a new Feasibility study. It is anticipated that EPA will conclude that progress towards meeting the current clean up standards has not been evident from five years of monitoring data.
- NSP and NMED agrees with NRC that UNC has not evaluated certain hazardous constituents identified in the ROD and incorporated in the NRC License. Whilst data for these constituents have been presented, UNC has not adequately evaluated how the data has been impacted by the corrective action.  
EPA and NRC made a decision in 1989 to eliminate certain constituents (antimony, barium, chromium, copper, iron, mercury, silver, thallium, zinc) based on the data that was available at that time. The data suggested that concentrations of these constituents were already below cleanup levels set in the ROD, thus the Remedial Design and Remedial Action Plan did not require UNC to monitor for these constituents.
- It may be appropriate to collect data on these constituents to make sure that they are still below the cleanup standards or deemed necessary for geochemical analysis.
- We agree that Corrective Action in the SW Alluvium should continue.

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### **Zone 3, Gallup Formation**

- NSP and NMED agrees with NRC that compliance with NRC standards, whether the current standards or any amended standards, must be demonstrated by UNC, before remedial action ceases on any impacted aquifers. NSP applauds NRC's statement that "Dewatering may not represent, by itself, compliance with standards".

- We believe it may be appropriate to evaluate separate remedial goals for each of the three aquifers.

- We support proposal to restart wells 714 and 715.

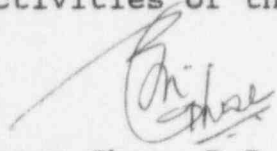
### **Zone 1, Gallup Formation**

- EPA, NSP and NMED agree that remedial action in zone 1 should continue until ACL application has been accepted and ALARA been demonstrated. Before granting an ACL, a waiver would be required from New Mexico Water Quality Commission (NMWQCC), for variance from NMWQCC clean up standards.

- EPA, NSP and NMED agree to sampling semiannually rather than present quarterly sampling.

### **Other Issues**

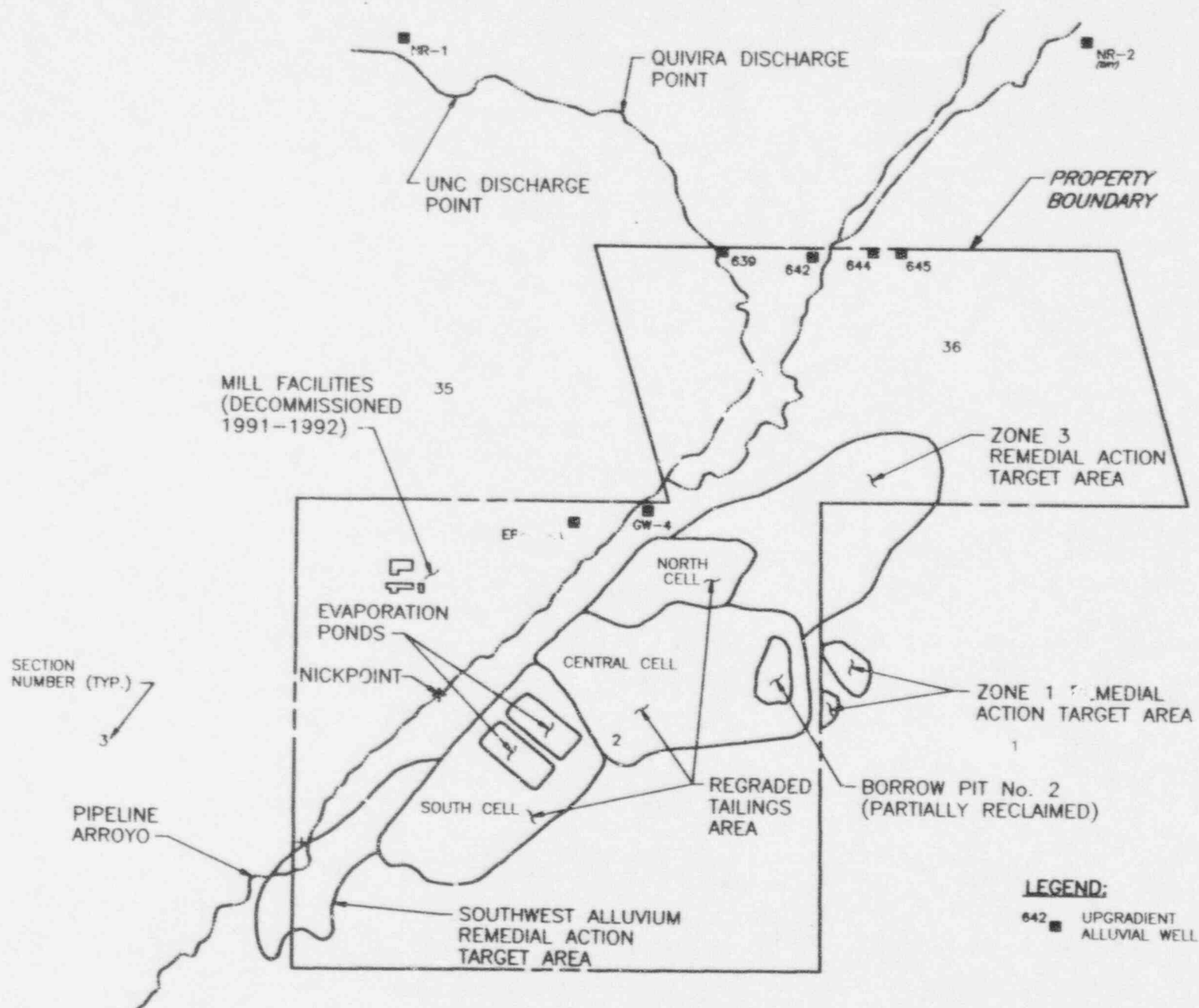
NSP and NMED have expressed their concern for potential impacts to the alluvial groundwater from the Quivara Mining Company operation north of the North Cell. There are two areas of concern: 1) Area north of the north cell where alluvial groundwater passes through before recharging Zone 3 of the Gallup Formation. This area was identified in the ROD as having been impacted by mounded seepage from the North Cell. 2) Area around the 600 series wells in Section 36. The exact specifics of impacts in this area(2) are unclear, and may be due to specific impacts from the Gallup formation, or due to poorly defined activities of the Quivara Mining Company.



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cc J. Curtiss, NSP  
S. Kent, NMED

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