



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001
December 13, 1996

Mr. Richard Sena, Acting Director
Environmental Restoration Division
Uranium Mill Tailings Remedial Action
Project
U.S. Department of Energy
2155 Louisiana NE, Suite 4000
Albuquerque, NM 87110

SUBJECT: VICINITY PROPERTY COMPLETION REPORT FOR THE MEXICAN HAT, UTAH
VICINITY PROPERTY NUMBER MH-024

Dear Mr. Sena:

The U.S. Nuclear Regulatory Commission staff has completed its review of the Vicinity Property (VP) Completion Report (CR) for property number MH-024 submitted by letter dated July 29, 1996. The property is a large arroyo (canyon) that runs from north of the former Mexican Hat processing site to the San Juan River. A pipeline from the processing site had discharged contaminated material into the arroyo. The Remedial Action Plan proposed to clean up the upper portion of the arroyo, and to apply supplemental standards to the sparsely vegetated lower portion of the arroyo, leaving approximately 1591 cubic yards of contaminated material. NRC staff concurred on this application of supplemental standards (January 3, 1992) based on the high cost of remediation and the low health benefit resulting from the remediation.

The U.S. Department of Energy (DOE) is now seeking NRC concurrence on this CR because during remedial action, DOE applied additional supplemental standards for Th-230 contamination. One grid (100 m²) in area A-1 (top of the upper portion of the arroyo) was found to have a sandstone ledge containing 85 pCi/g Th-230. The rocky area was backfilled to prevent erosion and ponding of runoff. DOE estimated that the volume of contaminated material is 100 cubic yards. DOE's justification for application of supplemental standards is the risk of injury to workers, the high cost relative to long-term benefits, and the existence of radionuclides other than Ra-226 [40 CFR 192.22(a) and (b)].

The CR contains Th-230 data for only 5 soil samples. One of the samples from Area A-1 was 92 pCi/g. In order to complete our review of the CR, NRC staff requests that DOE: 1) provide the rationale for this limited amount of Th-230 verification sampling; 2) address how the elevated soil sample of 92 pCi/g was handled; and 3) provide the analytical data for the sandstone sample.

NRC FILE CENTER COPY

WM-63

R. Sena

2

If you have any questions concerning this letter, please contact the NRC Project Manager, Harold Lefevre (301) 415-6678.

Sincerely,

[original signed by
Daniel M. Gillen for]

Joseph J. Holonich, Chief
Uranium Recovery Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

cc: R. Edge, DOE Alb
S. Hamp, DOE Alb
E. Artiglia, TAC Alb
J. Virgona, DOE GJPO

DISTRIBUTION: File Center NMSS r/f URB r/f PUBLIC
JSurmeier CCain RIV EBrummett CNWRA

DOCUMENT NAME: S:DWM\URB\HEL\MEXICAN.HAT\VP\FINALCR.D03

OFC	URB	E	URB	E	URB	E
NAME	HLefevre	HEG	DGillen	DWG	JHolonich	
DATE	12/05/96	H	12/13/96	H	12/13/96	

OFFICIAL RECORD COPY