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MEMORANDUM FOR: Leo B. Higginbotham, Chief
WMLUFROM: Malcolm R. Knapp, Chief
WMGT

SUBJECT: REVIEW OF UMRAP DRAFT CERTIFICATION PLAN, TAR-85055

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We have completed our review of the UMRAP Draft Certification Plan. Given the importance of this document to the UMRAP program, we think the Certification Plan does not contain enough information to allow the NRC to adequately determine what DOE intends to do for certification. In addition, the Certification Plan is deficient in that it does not specify the types of data to be collected and audits to be performed during remedial actions. Further, the Certification Plan does not discuss the criteria to be used to decide when new information warrants NRC involvement. Attached are major and detailed comments. Contributors to this review included William Ford, Jose Valdes, and William Dam. This review was coordinated by William Ford who can be reached at ext. 74697.

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PDR WASTE
WM-39 PDRMalcolm R. Knapp, Chief
WMGTEnclosure:
As stated

NOTE: *For concurrence see previous page.

DFC	:WMGT*	kd	:WMGT *	:WMGT *	:WMGT *	:WMGT	:	:
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We have completed our review of the UMTRAP Draft Certification Plan. Given the importance of this document to the UMTRA program, we think the Certification Plan does not contain enough information to allow the NRC to adequately determine what DOE intends to do for certification. In addition, the Certification Plan is deficient in that it does not specify the types of data to be collected and audits to be performed during remedial actions. Further, the Certification Plan does not discuss the criteria to be used to decide when new information warrants NRC involvement. Attached are major and detailed comments. This review was coordinated by William Ford who can be reached at ext. 74697.

Enclosure:
As stated

DFC : WMGT	kd : WMGT	MF : WMGT	Ali : WMGT	WMGT	:	:
NAME : WFord	W Ford	MFliegel	PJustus	KJackson	MKnapp	:
DATE : 85/08/21	85/08/21	85/08/21	85/08/21	85/08/	:	:

MAJOR COMMENTS ON UMTRA CERTIFICATION PLAN

The Certification Plan is very sketchy and does not contain enough information to allow NRC to adequately determine what DOE intends to do for certification. The plan should clearly lay out in detail the information that DOE expects to present in a Certification Report. Without this detail, the plan cannot provide guidance to DOE in the process of certification and in the preparation of the Certification Report. Further, without a detailed description of what DOE intends to do, the NRC cannot provide the detailed comments needed to reach agreement on what constitutes appropriate certification.

The Certification Plan does not specify what types of data and audits DOE intends to collect and perform during remedial actions. The data to be collected and the audits to be performed during remedial actions should either be specified in the Remedial Action Plan or the Certification Plan. If this information is not included in the Certification Plan, the Remedial Action Plans must be revised to include it. We recommend that the information be included in the Certification Plan.

The Certification Plan does not discuss the criteria to be used to decide whether a design change or the discovery of new information during remedial action activities would require NRC involvement prior to certification. The Certification Plan should define when NRC involvement is warranted, because the actual site remedial action may differ from the Remedial Action Plan either due to last minute design changes, contractor negligence, or unexpected conditions encountered during remedial action. Such a statement would provide guidance during remedial action on whether the NRC should be contacted. This would allow the NRC to interact early in the certification process to prevent costly retrofits after remedial actions are completed.

DETAILED COMMENTS ON UMTRA CERTIFICATION PLAN

Page 3, 2.0 Certification Report

The Certification Plan contains a proposed outline for Certification Reports. Based on the outline, the Certification Report will not contain a section that describes new data gathered during remedial action activities and what effect this information has on the remedial action's compliance with the EPA standards. Examples of new information that could affect compliance include discovery of faults and fractures, unexpected chemicals, and increased volumes of contaminated materials.

The Certification Report should summarize new data and design changes that could significantly affect certification. This summary should also include the date(s) that the NRC was notified of the change and the resolution. Developing a suitable summary (e.g. table) will shorten the time it takes the NRC to complete its review. Contacting the NRC early will allow issues to be resolved as they occur rather than after restoration has taken place.

Page 6, 3.0 Certification Procedures

Section 3 summarizes the process of certification. This section states that the certification process is anticipated to take approximately ten months. It is not clear if this period begins with report preparation or if it begins with NRC's review. The activities to which this time period refers to should be defined.

Figure 1

Figure 1, which outlines the activities and responsibilities of the certification process, is incomplete in three areas. First, the figure should be revised to identify NRC involvement with major design changes and inspections so that issues can be resolved early in the remedial action process. Second, the figure does not show NRC's concurrence in certification and finally, it incorrectly implies that the licensing process terminates with certification.

Page A2-1, Appendix 2

It would be helpful to include a paragraph for each appendix to Appendix 2 that describes its purpose, to clearly differentiate it from the other appendices. Further, a second paragraph should be supplied for each appendix, which describes the total content of the appendix in addition to the occasional examples provided in the draft.

Page A2-2, Appendix 2

Appendix 2 contains the Site Completion Report Summary Outline, which includes a heading that summarizes "as found conditions". However, no discussion is provided in the outline for the Site Completion Report Summary as to what type of "as found" geologic and hydrologic conditions will be summarized in Section III of the report (i.e., Remedial Action Assessment). Reports of the actual geohydrologic, geochemical, stratigraphic, structural and geomorphic conditions encountered during site preparation would appear to be appropriate. Such activities would include, for example, searching the excavations for evidence of faulting, as was recommended by the NRC for the South Clive Site, Utah.

Page A2-3, Certification Bases

Appendix 2 describes the Site Completion Report Summary Outline, which will contain a section titled "Certification Bases". The Certification Bases will include the RAC statement of recommendation for certification and a summary of radiological and geophysical evidence on which the recommendation for certification (from the RAC's point of view) is made. This statement implies that other information, including engineering, geologic, hydrologic, and geochemical data, will not be considered as a bases for recommendation of certification. This section should be revised to include all the information used as a basis of certification recommendation.

Page A2-4, Appendix A

Appendix A of the Site Completion Report will contain a list of specific items requiring DOE and NRC approval before revision. The outline for Appendix A provides examples of these types of items. However, it does not provide a discussion of how to identify items that are not in the list of examples, but would require DOE and NRC approval. Appendix A should contain this information.

Page A2-5, Appendix B

The Certification Plan states that Appendix B of the Site Completion Report will contain a complete set of construction specifications used, and any approved changes to specifications and why the changes were approved. However, the Appendix does not indicate who will approve the specifications. Appendix B should specify what is meant by approved changes.