

WM Record File AUG 23 1985 Project 39

Docket No.

PDR

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MEMORANDUM FOR:

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

FROM:

John T. Greeves, Chief  
Engineering Branch  
Division of Waste Management

SUBJECT:

WMEG REVIEW OF THE DRAFT "CERTIFICATION PLAN FOR URANIUM  
MILL TAILINGS REMEDIAL ACTION PROJECT PROCESSING SITES"

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REBrowning

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HJMiller

JOBunting

DGillen

LBHigginbotham

GGnugnoli

PDR

As requested in your Technical Assistance Request of July 26, 1985 (TAR #85054), we have reviewed the draft Certification Plan for the UMTRAP Project processing sites. Although specific comments are included in the enclosure, there are two major comments we would like to bring to your attention.

First, the certification plan appears to be very general. Due to its brevity, the document could eventually create miscommunication between the NRC and the DOE. This problem may be avoided if wording such as "a complete set of [construction specifications, calculations, construction drawings]" is replaced by specific detailed information.

Secondly, due to the large volume of material that will be sent to the NRC at the time of certification, it would be useful if the DOE included summaries of the information submitted. The response time (as identified in the MOU) for NRC review of the certification report is 45 days. Summaries of the detailed information will help to assure that the NRC response time is met.

If you should have any questions concerning this review, please contact Steve Smykowski of my staff.

ORIGINAL SIGNED BY

John T. Greeves, Chief  
Engineering Branch  
Division of Waste Management

Enclosure:  
As stated

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DATE	: 08/24/85	: 08/24/85	: 08/24/85	:	:	:	:

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WMEG Review of the Draft "Certification Plan for Uranium Mill  
Tailings Remedial Action Project Processing Site"

1. Figure 1 - The last item in this figure implies that the licensing process is part of the certification process. These are two separate processes. The licensing process should not be considered part of the certification process.
2. Section III, 2-b, c - The "as found condition" for "actual radiation" and "actual quantities of material found" will be summarized in the remedial action assessment. It is unclear what the word "actual" means. Do "actual radiation" and "actual quantities of materials found" represent the values that have been reported in the RAP (estimations) or do they represent values that have been determined during the remedial action process?
3. Appendix 2, Section III-5, Page A 2-3 - This section indicates that a summary of the completed condition will be included in the Site Completion Report. It is unclear whether geotechnical data from the site will be included in this summary (i.e. field densities, moisture contents, soil classifications, etc.). Since this section will contain the details and basis for verifying that remedial action has been completed as specified in the RAP, it should include a summary of the geotechnical data that was generated during remedial action.
4. Appendix 2, Section IV, Page A2-3 - It is unclear what will be included in the "summary of radiological and geophysical evidence" by which the recommendation for certification is to be made. Will any geotechnical data be included? It is recommended that this section be more specific when identifying what will be included in the summary.
5. Appendix A, Page A2-4 - What is meant by "end use requirements"?
6. Appendices B, C, D, Pages A 2-5 to A 2-7 - These appendices indicate that a "complete set" of information (i.e. construction specifications, calculations, and drawings) will be included in the RAC Site Completion Report. Due to the voluminous material that will be included in the report, it is recommended that a summary be presented for each set of information. This will reduce the staff review time and help to assure the reviews are completed within the time period specified in the MOU.

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