

WM DOCKET CONTROL
CENTER



RECEIVED
NRC

1985 JUL 26 AM 11:07

'85 AUG -1 P3:38

STATE OF NEVADA
DEPARTMENT OF HUMAN RESOURCES

HEALTH DIVISION

505 East King Street
Carson City, Nevada 89710

RICHARD H. BRYAN
Governor

REGION VI&F

JERRY GRIEPENTROG
Director

July 23, 1985

WM Record File

WM Project

Docket No.

PDR

LPDR

S.V. Wright, Jr., Vice-President
U.S. Ecology, Inc.
P.O. Box 7246
Louisville, KY 40207

Distribution:

Shaffer

R. Lee

STARMER

K-Schnieder

(Return to WM, 623-SS)

Dear Mr. Wright:

This is a list of subjects we would like to discuss at the meeting on U.S. Ecology's Site Closure dated February 7, 1985, scheduled for July 25, 1985.

Our review of the site closure plan indicates that while there is a large amount of data presented about the site, it is not presented in an organized manner. Further, in some areas, there is a lack of in-depth data and documentation. Therefore, we are requesting U.S. Ecology, Inc. to modify the site closure plan by reorganizing it and supplying additional information.

1. The site characterization is not complete and is not presented with enough detail.
 - a. Technical information is needed to document the direction of flow of the water under the site.
 - b. Information addressing water use in the area, both present and anticipated, should be included in the closure plan.
 - c. A cross section map across the valley with elevations is needed to indicate whether the knoll the site is on would be above the 300 year flood plain.
 - d. A determination should be made of the ways radionuclides may be transported from the site. This should include movement of water through the unsaturated zone and the possibilities of wastes reaching the ground water below the site. Also, the presence of tritium in site wells should be explained.

8508140322 850723
PDR WASTE
WM-8

PDR

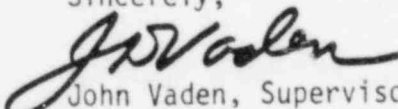
ORIG NOT REC'D

U.S. Ecology Site Closure
July 23, 1985
Page Two

- e. A technical model illustrating all site characteristics should be developed.
2. More information is required on performance assessment of the site.
 - a. Determine the pathways through which radioactive waste is most likely to escape from the site and the degree of likelihood of this happening.
 - b. Determine what radionuclides are likely to follow the pathways and estimate the quantities of such releases. Determine the likely dilution of the radionuclides when they reach the outside edge of the buffer zone.
 - c. Predict the time the releases of radionuclides are likely to occur after site closure.
 - d. Estimate the amount of slumping of trench surfaces that will occur during the 100 years after site closure, in cubic feet of dirt needed to fill-in the trenches.
3. Based on the above, specify the type and extent of environmental monitoring needed at the site in the post closure period.
 - a. Develop a plan for monitoring the buffer zone between the chemical and radiological site for determining the migration of chemicals or radioactive materials.
 - b. Justify the proposed six month post closure period on the basis of the findings in paragraph (2) above.
4. Define all possible mitigating actions that can be taken if the postulated releases discussed in paragraph (2) above occur. Estimate and rank the potential effectiveness for each type of mitigating action.

All of the information about the site, including the above, any that we have or USGS has, should be organized into one package which should demonstrate that comprehensive consideration has been given to containment of radionuclides onsite, that if migration of radionuclides occurs offsite it will be discovered by the monitoring system, and that there are procedures and methods which can be employed to mitigate or stop the migration.

Sincerely,


John Vaden, Supervisor
Radiological Health

bcc: Jack Hornor, NRC; JV/RF; Stan Marshall; Larry Franks; U.S. Ecology File