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ENVIROCARE OF UTAH, INC.
THE SAFE ALTERNATIVE

January 16, 1997

Mr. Harold LeFevre
US Nuclear Regulatory Commission
TWEN -- Room 2C22, M/C 7J9
11545 Rockville Pike
Rockville, MD 20852-2738

Dear Mr. LeFevre:

On Friday, January 10, 1997, I received from Eartintax and from Mountain States Analytical Laboratory the analytical results for the first and second confirmatory samples for the third quarter and the initial sample for the fourth quarter as required under Envirocare's radioactive materials license for the disposal of 11e.(2) material. Split samples were collected and submitted to both Mountain States Analytical and American West Analytical Laboratories for the first and second confirmatory events for the third quarter. This letter is to follow up my phone call to you on January 15, 1997, reporting the results I received.

Envirocare has hired Adrian Brown and Associates to help us evaluate the results of the 11e.(2) monitoring and the discrepancy between the data from the two laboratories. We will submit a preliminary finding of their evaluation to you during the week of January 20, 1997. A preliminary review by Adrian Brown and Associates indicates that:

- arsenic and selenium are the two major constituents of concern for which the two laboratories have significantly different results
- the two laboratories are using different analytical procedures for both arsenic and selenium
- the analytical method used by Mountain States Analytical appears to be the better procedure
- a correlation exists between the arsenic measurements between the two laboratories
- at the present time no correlation has been developed between the two laboratories for selenium.

Attached is a table which lists the results of both the second and third quarter monitoring. Included in the table are the well identification, the Table S-1 and Table STD-1 value, the modified S-1 and STD-1 values for the Mountain States analyses, an identification of the laboratory (Mountain States Analytical is abbreviated MS and American West Analytical Laboratory is abbreviated AWAL) performing the analysis, and the results of each sampling event.

As indicated, the attached table lists both the Mountain States and the American West Analytical Laboratories data. The correlation between the two laboratories for arsenic has been applied to the Table S-1 and Table STD-1 values. These results are shown on the attached table as the Table S-1 and STD-1 arsenic values for the Mountain States data. Mountain States Analytical's data are consistently 50 percent higher than the American West Analytical Laboratories data for

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arsenic. The arsenic values in Table S-1 were simply multiplied by 1.5 to account for the difference in laboratories.

Results from American West Analytical Laboratories confirm an exceedance of background arsenic concentrations listed in Table S-1 only for GW-57 and confirm no exceedances for arsenic when compared to Table STD-1 for site specific standards. Results from American West Analytical confirm an exceedance background on selenium concentrations listed in Table S-1 for Selenium in GW-24.

Results from Mountain States Analytical also listed in the attached Table indicate that there are concentrations above background values listed in Table S-1 for arsenic, selenium, and lead. The Table also lists the Site Specific Standards for arsenic in Table STD-1. A comparison with these values indicates that there are arsenic concentrations above the site specific standards in Table STD-1 as shown in the Table.

Until this issue is resolved to NRC's satisfaction, it is our intention to resample for every well and constituent when concentrations by any lab exceed the existing unmodified Table S-1 values. For the fourth quarter, Envirocare is resampling January 15-16, 1997, based on all data collected during the initial sampling of November 19-20, 1997.

Envirocare is convinced, based on our technical evaluations, that the concentrations being measured in the monitoring wells are from native materials already present and existing as part of the sites background. It is our position that we had only one actual exceedance for lead in GW-28 and one for Selenium in GW-24 during the third quarter. This position is based on using the American West Analytical Laboratories data to compare to Tables S-1 and STD-1 for selenium and arsenic. American West Analytical Laboratories data was used to establish Tables S-1 and STD-1. For lead, only the Mountain States Analytical data could be used because the detection limit for the American West Analytical Laboratories data was above the Table S-1 values.

As we have indicated in previous letters, specific information will be provided to NRC to substantiate our position. A preliminary technical memorandum supporting this position will be submitted to NRC during the week of January 20, 1997. Envirocare has also asked for a meeting to discuss this preliminary report and plans to submit a final report by March 1, 1997.

Please contact me if you have any questions.

Sincerely,



Kenneth L. Alkema
Director of Government Affairs

TABLE
SUMMARY OF 11e.(2) MONITORING FOR INORGANICS AND ORGANICS
2nd & 3rd Quarters 1996 with Table S-1 Concerns

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WELL	PARAMETER	LAB	TABLE S-1 (mg/l)	TABLE STD-1 (11/20/95)	INITIAL RESULT Q2, May 7-	1st OR 2nd CONFIRMATION ON, Q2, Aug	INITIAL RESULT Q3, Aug 13	CONFIRMATION ON, Q3, Oct 24-25 (mg/l)	CONFIRMATION ION, Q3 Dec 4-5 (mg/l)
GW-19A	Arsenic	MS	*0.054	*0.054	0.044	0.047	0.047	0.045	0.041
GW-19A	Arsenic	AWAL	0.036	0.05				0.022	0.031
GW-19A	Silver	MS	0.005				0.01	<0.003	U
GW-19A	Silver	AWAL	0.005					<0.01	<0.01
GW-24	Arsenic	MS	*0.048	0.05	0.033	0.034	0.034	0.034	0.04
GW-24	Arsenic	AWAL	0.032	0.05				0.02	0.028
GW-24	Mercury	MS	0.00029				0.0005	<0.0001	U
GW-24	Mercury	AWAL	0.00029					<0.001	<0.001
GW-24	Selenium	MS	0.009		0.032	0.033	0.039	0.028	U
GW-24	Selenium	AWAL	0.009					<0.005	0.014
GW-25	Arsenic	MS	*0.165	*0.165	0.117	0.117	0.117	0.095	0.11
GW-25	Arsenic	AWAL	0.11	0.11				0.077	0.089
GW-25	Selenium	MS	0.005				0.009	0.009	U
GW-25	Selenium	AWAL	0.005					<0.005	<0.005
GW-26	Cyanide	AWAL	0.005					<0.005	<0.005
GW-26	Cyanide	MS	0.005				0.007	<0.002	0.002
GW-26	Arsenic	MS	*0.3	*0.3	0.0234	0.215	0.218	0.197	0.27
GW-26	Arsenic	AWAL	0.2	0.2				0.14	0.17
GW-26	Mercury	MS	0.0002		0.0006	0.0014	0.0014	<0.0001	U
GW-26	Mercury	AWAL	0.0002					<0.001	>0.001
GW-26	Selenium	MS	0.014				0.018	0.027	U
GW-26	Selenium	AWAL	0.014					<0.005	0.006
GW-26	Silver	MS	0.005				0.008	<0.003	U
GW-26	Silver	AWAL	0.005						<0.01
GW-27	Arsenic	MS	*0.089	*0.089	0.11	0.071	0.104	0.072	0.079
GW-27	Arsenic	AWAL	0.059	0.059				0.044	0.061
GW-27	Silver	MS	0.005				0.008	<0.003	U
GW-27	Silver	AWAL	0.005						<0.02
GW-28	Arsenic	MS	*0.117	*0.117			0.09	0.079	0.098
GW-28	Arsenic	AWAL	0.078	0.078				0.056	0.068
GW-28	Lead	MS	0.005				0.007	0.0049	0.008
GW-28	Lead	AWAL	0.005					<0.05	<0.005
GW-28	Selenium	MS	0.005				0.007	0.007	U
GW-28	Selenium	AWAL	0.005					<0.005	<0.005
GW-29	Arsenic	MS	*0.035	0.05	0.028	0.029	0.029	U	0.037
GW-29	Arsenic	AWAL	0.023	0.05	0.028	0.029		0.016	0

*Table S-1 Modifications for MS Data

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GW-57	Arsenic	MS	*0.039	0.05	0.046	0.047	0.047	0.047	0.049
GW-57	Arsenic	AWAL	0.026	0.05				0.022	0.033
GW-57	Mercury	MS	0.00038				0.0009	<0.0001	U
GW-57	Mercury	AWAL	0.00038					<0.001	<0.001
GW-57	Selenium	MS	0.005				0.008	0.009	U
GW-57	Selenium	AWAL	0.005					<0.005	<0.005
GW-57	Silver	MS	0.005				0.008	<0.003	U
GW-57	Silver	AWAL	0.005					<0.01	0.01
GW-58	Cyanide	AWAL	0.005					<0.005	<0.005
GW-58	Cyanide	MS	0.005				0.006	0.002	0.003
GW-58	Arsenic	MS	*0.18	*0.18			0.127	0.129	0.21
GW-58	Arsenic	AWAL	0.12	0.12				0.086	0.11
GW-58	Selenium	MS	0.005				0.01	0.018	U
GW-58	Selenium	AWAL	0.005					<0.005	<0.005
GW-58	Silver	MS	0.005				0.007	<0.003	U
GW-58	Silver	AWAL	0.005					<0.01	<0.01
GW-60	Cyanide	AWAL	0.005					>0.005	<0.005
GW-60	Cyanide	MS	0.005				0.008	<0.002	0.006
GW-60	Arsenic	MS	*0.0435	0.05	0.035	0.034	0.034	0.039	0.033
GW-60	Arsenic	AWAL	0.029	0.05				0.022	0.025
GW-60	Selenium	MS	0.015				0.031	0.027	U
GW-60	Selenium	AWAL	0.015					<0.005	0.013
GW-63	Arsenic	MS	*0.051	*0.051	0.036	0.039	0.039	0.041	0.047
GW-63	Arsenic	AWAL	0.034	0.05				0.023	0.029
GW-63	Chromium	MS	0.005				0.01	<0.005	U
GW-63	Chromium	AWAL	0.005					<0.01	
GW-63	Silver	MS	0.005				0.01	<0.003	U
GW-63	Silver	AWAL	0.005					<0.01	

*Table S-1 Modifications for MS Data