



The Oregon Department of Energy

LABOR & INDUSTRIES BUILDING, ROOM 102, SALEM, OREGON 97310

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TO: Lakeview Advisory
Committee Distribution

DATE: August 9, 1985

FROM: Felix R. Miera

SUBJECT: Lakeview Remedial Action Committee Meeting

An Advisory Committee meeting is scheduled for August 14, 1985, at the Lake County Court House, Memorial Hall, beginning at 7:00 p.m. Enclosed is an agenda for the meeting. As you will note, there are several important items listed on the agenda for discussion.

Jim Brinkman of Sergeant, Hauskins & Beckwith, a U.S. Department of Energy (US DOE) Contractor, will present the initial geotechnical and geochemical data and results collected at the proposed alternate site for final disposition of the tailings.

We would also like to discuss with you several items that deal with the Draft Remedial Action Plan issued by the US DOE in March 1985. Attached to this meeting announcement is a copy of our staff comments submitted on the Draft to the US DOE for your information.

In addition, there is also attached for your review and comment, a copy of a proposed "Lakeview Site Management Plan". The management plan was recently submitted to the US DOE and will be important to the accomplishment of the Final Remedial Action at the site. Your input is requested. Finally, we would like to discuss with you, the Department's recommendations to the Energy Facility Siting Council on the Draft plan. These recommendations will be made to the Council at their meeting in Lakeview September 6th.

FRM:tg
24-Memos (F1)

WM Project No.

WM Project

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Docket No.

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Lakeview Remedial Action
Advisory Committee Meeting
August 14, 1985
Meeting Time - 7:00 p.m.

Agenda

- I. Activity Status Report
- II. Progress Report by Sergeant, Hauskins & Beckwith on the geotechnical and geochemical evaluation of the proposed alternate site.
- III. Discussion of the Draft Remedial Action Plan
 - A. Comments submitted by the Oregon Department of Energy
 - B. Proposal for a "Lakeview Site Management Plan"
 - C. Recommendations on the Draft to be presented to the Energy Facility Siting Council
- IV. Public Comment Period

The Lakeview Remedial Action Committee welcomes public comments and suggestions relevant to matters within the Committee's jurisdiction. This opportunity is provided to bring concerns or matters not included on the agenda to the Committee's attention.

FM:tg
25-Sitmisc (F1)
08/08/85



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July 30, 1985

Mr. John Themelis
US DOE, Albuquerque Office
PO Box 5400
Albuquerque, NM 87115

Dear Mr. Themelis:

The Oregon Department of Energy (ODOE) has reviewed the Draft Remedial Action Plan (DRAP) proposed for the Lakeview Uranium mill tailings site. These comments are in addition to those provided primarily concerning the draft environmental assessment, but pertaining in part to the DRAP.

Of major concern to ODOE staff is the completion of the remedial action in a timely fashion, within budget projections, and above all in a spirit of keeping future radiation exposures as low as is reasonably achievable (ALARA). Toward this end, I will summarize several points of general comment that we wish to call out for your attention:

1. It is stated in several places in the DRAP, but has since been the subject of reconsideration, there shall be a two foot thick, low permeability clay liner beneath the final disposal site.

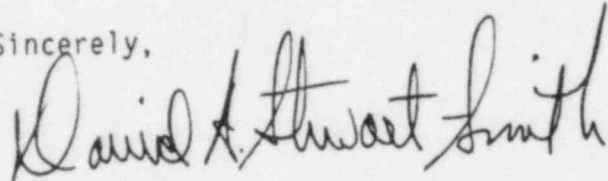
With the understanding that it is important that there be an appropriate balance of permeability between the cap and the liner, we feel strongly that the use of a liner is the only way to assure isolation of the tailings from the environment. Backed by our commitment to an ALARA-based site design, you may consider this a matter of concurrence.

2. A comprehensive site management plan, agreed to by the US DOE and the ODOE is Oregon's only way of assuring that state funds are being spent effectively, and that the waste isolation requested by the Act and the ALARA philosophy is achieved. Comments on the latest draft of this management plan have been forwarded to Dave Ball of your office.

3. We consider concurrence in the final RAP, to be provisional. There shall be several steps in facility design and construction where Oregon's approval must be provided prior to moving ahead with additional work. We will, after all, as the agency responsible for protecting the public health and safety in this matter, must be able to live with the results once remedial action is complete. These points are indicated in the information sent to Dave Ball.
4. The comments on the DRAP provided by the USNRC must be reconciled prior to Oregon's concurrence in the RAP.

In addition to these overall comments, we have prepared specific comments keyed to the DRAP. I have attached these as a separate document, to this letter. Thank you for this opportunity to provide comments on the DRAP, we look forward to continued cooperation in this project. We would especially like to thank the staff of the Jacobs-Weston technical assistance team for their assistance and hard work. In particular, Leon Stepp, Project Manager for Jacobs-Weston, without whose skill and effort we would be in a much less favorable position to proceed. Should you have any questions, or would like additional clarification on any of these comments, please contact me at (503) 378-3187.

Sincerely,



David A. Stewart-Smith, Manager
Radioactive Materials Program
Siting and Regulation Division

DS-S:ja
1-Letter(d1,f1)

Attachments

Oregon Department of Energy
Comments on the Draft Remedial Action Plan
Lakeview, Oregon

Page 28 (top bullet) - Please clarify how the distinction will be made between contaminated and uncontaminated wood chips from the raffinate pond.

Page 28 - Please provide a plan whereby the processing site and the relocation site will be stabilized and protected from damage and erosion between construction seasons.

Page 36 (5.6.1, 3rd paragraph) - Are any state or local permits required for the relocating of Hammersley Creek? How can ODOE be of assistance?

Page 43 (5.8.2) and Page 55 (7.2.5) - Last paragraph. Oregon must have equal standing as the US DOE regarding availability of information and final site certification.

Page 55 (7.2.4) - Oregon must have access to preliminary engineering drawings as well.

Page 56 (7.2.9) - What will be the level of US DOE audit involvement? How will the State of Oregon access this information?

Page 57 (8.1), paragraph 2 - The State of Oregon, being the eventual custodian of the disposal site must be involved as an equal partner in the design of the surveillance and maintenance (S&M) program. In addition, we believe that there should be an option for ODOE to serve as the S&M contractor.

Page 60 & 61 (9.6 & 9.8), paragraph 2 - These records and drawings should be available to the State as well.

Glossary - Designations of Radium-226 and Rn-226 - Radon-222 and Ra-222 do not serve any clarifying purpose, and are misleading. Please correct these.

Page B-32 (B.1.3.1.), third bullet - Will there be any confirmatory surveys to ascertain the degree of mixing and the usefulness of the assumption of average concentration values?

Page B-41 (B.1.3.4.) - Blending of the Radon barrier material to eliminate pockets of sand should be a requirement; it is stated in a permissive tense. The same blending will be necessary for the clay liner material.

Page B-74 (B.3.3.2.), paragraph 2 - Is an average permeability of 1×10^{-7} a reasonable figure for materials considered to be clay? What will be the projected travel times for tailings constituents from the site as a function of changes in permeability? Please provide this analysis, considering a range of 10^{-5} to 10^{-10} cm/sec permeability and an assessment of the availability of materials of this range of permeability in the Goose Lake Valley, or as a trucked-in clay material. Please consider SO_4 , U, Ra, As and Th, and a reasonable range of fluctuating groundwater levels. What would be the travel time to the edge of the 40-acre site given a reasonable range of parameters?

Lakeview Site Management Plan

Discussion

Oregon is contributing significant state funding to the Lakeview remedial action program. Because of this, it will be necessary to commit to an action plan guiding the expenditure of these funds. This plan consists of the identification of significant points in the remedial action process where Oregon participation and concurrence will be necessary before work can proceed by the contractor. This management plan covers 3 time frames.

1. pre-construction property acquisition and engineering.
2. construction work and health physics.
3. post-construction approval and monitoring.

Each time frame will be presented in terms of decision points to be agreed upon by the State of Oregon before we will approve the expenditure of state funds.

Schedule oversight, fiscal oversight and mechanism for involvement of local advisory committee

I. Pre-Construction Property Acquisition and Engineering

Property acquisition is the responsibility of the State of Oregon. Preparation for acquisition includes proof of title, property appraisals, negotiation, and if necessary, condemnation proceedings.

During the pre-construction phase, several key events must be reviewed and approved by the Oregon Department of Energy. These are:

1. initiation of preliminary engineering review by construction contractor.
2. initiation of site design engineering by construction contractor.
3. approval of a comprehensive environmental monitoring program to include preoperational.
4. approval of a final site design.
5. approval of construction phase health physics program.
6. approval of construction sub-contractors.

7. approval of contracts for borrow materials, water, and rights of entry or passage.
8. approval of overall construction plan for the entire project.

In addition, Lakeview Program Manager will review monthly statements of work performed and funds expended by federal contractors. Any discrepancies with overall site action plan will be reconciled with US DOE site manager and construction contractor site manager within 15 days of the end of the month. It is important that the Oregon Department of Energy maintain close communications with the UMTRA project office and federal contractors throughout this planning period.

II. Construction Work and Health Physics Program

The Oregon Department of Energy will maintain at least contact with the Albuquerque office US DOE, and with the construction contractor throughout the construction phase.

The Lakeview local task force will be involved in reviewing site design and construction progress and in making recommendations to the State of Oregon, the US DOE, and the construction site manager. This includes but is not limited to:

- ° the task force will be the forum for problems associated with such local impacts as dust control, traffic problems and road deterioration, contractor employee conduct, and others.
- ° the task force will suggest ways that the remedial action program can be of maximum benefit to the economic health of the community.

The construction contractor will produce a month-by-month schedule of work to be performed and an associated cost estimate by the beginning of each work session.

The State of Oregon will receive monthly statements of actual work performed and costs incurred within 15 days following the end of the statement period.

All discrepancies between the construction plan and actual work performed will be outlined in an attachment to the statement. In addition, any shortfall in the monthly goals shall be rescheduled within the same working season, and a construction plan amendment produced to show how the work can be made up that season.

During the construction phase, several key events must be reviewed and approved by the Oregon Department of Energy. These are:

1. approval of the month-by-month construction plan for each construction season by April 1st. We must have 2 working weeks to review and approve the seasonal month-by-month plan.
2. initiation of construction.

3. approval of the final excavation.
4. approval of final liner construction and placement.
5. approval of site condition for winter construction stoppage.
6. approval of final site completion, release of existing mill site properties for unrestricted use, and final approval of adjacent properties clean-up.

In addition, through periodic site inspections, the quality control of various aspects of site construction will be subject to state review, and authority to require changes to make improvement. This includes, but is not limited to:

- dust control measures
- health physics program (Oregon Health Division)
- liner and cap material composition, condition, and placement
- nuisance issues with local residents

III. Post Construction

The State of Oregon Department of Energy will have first consideration as the post-construction monitoring contractor.

As the federal post-construction monitoring funding comes to a close, a fund will be established in the state treasury. This fund will be sufficient to provide, from the interest of the account, for continued environmental monitoring by the State of Oregon.

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