

8-10-97
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ENVIROCARE OF UTAH, INC.

THE SAFE ALTERNATIVE

February 5, 1997

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

Dear Mr. LeFevre:

The purpose of this letter is to follow up on Envirocare's letter of January 16, 1997, to you concerning third quarter monitoring results and to identify a compliance monitoring plan and any additional site specific values for any necessary constituents.

Please let me state once more that the technical information Envirocare has collected to date continues to confirm that all measured values are part of background and are native materials already present in the ground and the groundwater at the site. However, until this issue is fully resolved and the Envirocare Radioactive Material License for 11e.(2) waste modified, Envirocare will carefully and fully comply with all license requirements for apparent exceedances from results based on either Mountain States Analytical or American West Analytical Laboratories data. Envirocare plans to ask and to provide convincing support to amend the Company's Radioactive Material License for 11e.(2) waste and modify Table S-1.

Although Envirocare did not understand that Table STD-1 had been made part of our license, we are now proceeding with monitoring and evaluations based on this Table being part of the license. The attached Table lists the results of second and third quarter monitoring along with both Table S-1 and Table STD-1. For any arsenic measurements that exceed a Table STD-1 value or any other constituent that exceeds a Table S-1 value, Envirocare will sample these wells for these constituents monthly through March 1997 and quarterly thereafter as our compliance monitoring program. Based on the data collected from this increased monitoring, Envirocare may extend the monthly sampling.

Additionally, Envirocare is requesting that the Table S-1 values be established as the site specific standards for any constituent and well for which there is an apparent exceedance shown in the attached Table. As stated in our January 16th letter, it is Envirocare's position that apparent exceedances should be based on American West Analytical Laboratories data when considering either the Table S-1 or Table STD-1 values. Until this issue is satisfactorily resolved, Envirocare plans to treat any confirmed measured value that is above the values listed in either Table STD-1 or Table S-1 from either Mountain States Analytical or from American West Analytical Laboratories the same to ensure compliance with Section 11.1(g). Therefore, Envirocare is recommending the setting of site specific standards not already established as Table S-1 values for any constituent and well where the measured concentration of a constituent is above the Table S-1 value based on data from either laboratory.

Please contact me if you have any questions or need any clarification.

Sincerely,



Kenneth L. Alkema
Director of Government Affairs

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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 7-9, mg/l | 1st OR 2nd CONFIRMATION, Q2, Aug 9, 13-15, (mg/l) | INITIAL RESULT Q3, Aug 13-15, mg/l | CONFIRMATION, Q3, Oct 24-25 (mg/l) | CONFIRMATION, 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

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

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1/17/97

| WELL | PARAMETER | LAB | TABLE S-1 (mg/l) | TABLE STD-1 (11/20/95) | INITIAL RESULT Q2, May 7-9, mg/l | 1st OR 2nd CONFIRMATION, Q2, Aug 9, 13-15, (mg/l) | INITIAL RESULT Q3, Aug 13-15, mg/l | CONFIRMATION, Q3, Oct 24-25 (mg/l) | CONFIRMATION, Q3 Dec 4-5 (mg/l) |
|-------|-----------|------|---------------------|---------------------------|--|--|---|---------------------------------------|------------------------------------|
| 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