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IN REPLY REFER TO:

United States Department of the Interior



NATIONAL PARK SERVICE
Southeast Utah Group
Arches and Canyonlands National Parks
Natural Bridges National Monument
Moab, Utah 84532-2995

L7619(SEUG-RM)

January 23, 1997

Mr. Joseph J. Holonich, Chief
Uranium Recovery Branch
Division of Waste Management (MS T7-J9)
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Holonich:

Atlas Corporation has sent us a copy of a December 16, 1996 letter to you regarding their Corrective Action Program (CAP) Review.

In our role as a Cooperating Agency on the reclamation plan Environmental Impact Statement, we would like to offer a few observations on the CAP Review.

It appears that many of the water concentrations from de-watering wells reported as "U" for undetected were perhaps reported that way because the detection limits used were too high. Potential problems with using detection limits that are too high include:

- 1) False Negatives: Implying something is not there when it really is.
- 2) Decreased ability to fingerprint wastes from the pile as they enter the river or other places.
- 3) Inability to compare the concentrations with low drinking water criteria or other common benchmarks, many of which are lower than some of the detection limits used.

Here is a comparison of some of the detection limits used in the CAP versus what we routinely recommend be used in the National Park Service:

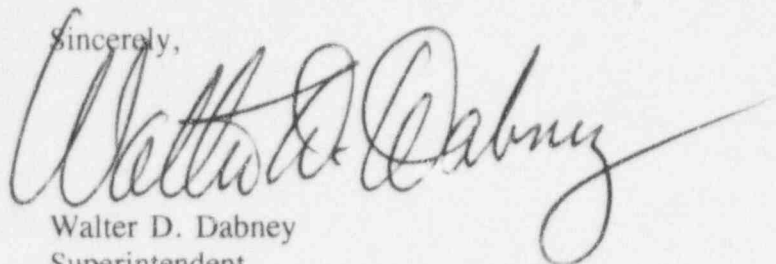
<u>analyte</u>	<u>used (ppm)</u>	<u>recommended (ppm)</u>
aluminum	0.5	0.05
arsenic	1	0.005
barium	0.2	0.001
beryllium	0.04	0.0005
boron	1	0.1

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<u>analyte</u>	<u>used (ppm)</u>	<u>recommended (ppm)</u>
cadmium	0.05	0.002 or 0.0005
chromium	0.1	0.003
iron	1	0.1
lead	0.5	0.001
selenium	1	0.001
silver	0.1	0.0001
zinc	0.2	0.01

We hope this information is helpful in determining progress in attaining groundwater protection standards. If you have any questions about the contents of this letter, please contact Roy Irwin of our Water Resources Division at (970) 225-3520.

Sincerely,



Walter D. Dabney
Superintendent
Southeast Utah Group

cc:

Vijai Rai, OPEC-DOI
Dan Kimball, WRD-NPS