



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 20, 1997

U.S. Department of Energy
ATTN: Joseph Virgona, Project Manager
Grand Junction Project Office
P.O. Box 2567
2597 B 3/4 Road
Grand Junction, CO 81502

SUBJECT: LAKEVIEW EROSION PROTECTION MONITORING

Dear Mr. Virgona:

The U. S. Nuclear Regulatory Commission staff has reviewed the U. S. Department of Energy (DOE) report, "Observations and Recommendations for Developing an Erosion Protection Monitoring Program for the Lakeview, Oregon, Title I disposal Site," submitted by letter dated December 20, 1996. Based on this review, the staff agrees that the initial survey proposed by DOE is needed to identify baseline conditions for the cell erosion protection. The program identified in the submittal appears to be acceptable, but additional information is needed before the staff can evaluate the acceptability of the entire monitoring program.

The staff recognizes that much of the information that is needed will be provided after the initial baseline studies are completed and evaluated. Therefore, it is premature at this time to specify future monitoring activities. Factors such as number of samples to be evaluated, number of large rocks to be observed, sampling methods, sampling frequency, and other variables can be determined only after the baseline study is completed. Therefore, the monitoring procedures outlined in the submittal will likely need to be re-evaluated.

The monitoring procedure specified by DOE indicates that some sampling will occur biannually. ("Biannual" is defined by Webster as twice a year.) In the context of the submittal, it appears that DOE would like to sample the rock every two years, or biennially; however, the NRC staff considers that sampling every two years is not sufficient and that sampling twice a year may be excessive, unless it is determined that the rock is deteriorating extremely rapidly. Sampling during each annual inspection is likely to be more appropriate, until trends or patterns are established. When the actual sampling frequency is determined after the baseline studies, DOE should clarify the intended sampling frequency.

DOE is requested to keep the NRC staff apprised of the schedule for activities at the site, including the annual inspection and the data-gathering

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J. Virgona

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activities. If you have any questions, please contact the NRC Project Manager, Ted Johnson at 415-6658.

Sincerely,

(Original signed by)

Joseph J. Holonich, Chief
Uranium Recovery Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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