



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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'85 AUG 27 P1:58

AUG 16 1985

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Index #

Title of file

Edmund B. Moran, Jr.
Assistant Attorney General
Environmental Control Division
100 West Randolph Street, 13th Floor
Chicago, IL 60601

Dear Mr. Moran:

SUBJECT: US ECOLOGY INC. SHEFFIELD, ILLINOIS LOW-LEVEL WASTE BURIAL SITE

By letter dated July 10, 1985 (copy enclosed) Dr. Terry Lash, Director, IDNS requested of Mr. Larry Toler, District Chief, U.S. Geological Survey (USGS) that all USGS structures on the Sheffield low-level radioactive waste disposal facility (LLWDF) be removed or decommissioned by October 31, 1985. This request was made of USGS without the knowledge or consent of the U.S. Nuclear Regulatory Commission (NRC).

I remind you, and hope that you will remind Dr. Lash, that the NRC continues to be the primary regulatory authority for the Sheffield LLWDF. Further, as you well know, there is currently a legal proceeding before the Atomic Safety and Licensing Board involving decommissioning to which the State of Illinois, the NRC and the site licensee, US Ecology Inc., are parties. For these reasons the NRC has a regulatory interest in any decommissioning activities associated with Sheffield. We are disturbed that IDNS has chosen to make this request of USGS without consultation with the NRC. Decommissioning activities that are not already authorized by the existing license or by Commission regulations should not take place without prior NRC approval.

In particular, some of the facilities which would be decommissioned as a result of Dr. Lash's request, particularly USGS monitoring wells, are, in the opinion of the NRC staff, an integral part of the post-closure activities associated with site decommissioning. The NRC's mandate for protection of public health and safety, and the environment therefore dictates that we exercise our regulatory authority and not approve the removal of any facilities that we deem necessary for the protection of public health and safety.

WM Record File

WM Project

Docket No. 27-39

PDR ☒

LPDR ☒

Distribution:

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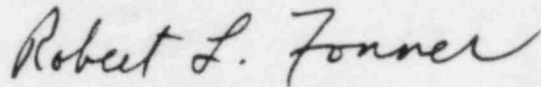
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Members of the NRC staff met with the USGS Office of Hazardous Waste Hydrology in Reston, VA on July 30, 1985. The staff indicated to USGS which of their monitoring locations are considered by NRC to be an integral part of the site closure plan. This information is attached.

I look forward to your full cooperation in this matter. If you have any questions about the contents of this letter please do not hesitate to contact me.

Sincerely,



Robert L. Fonner, Deputy Director
Regulations Division
Office of the Executive Legal Director
Counsel to NRC Staff

Enclosures:

1. Ltr to L. Toler from
T. Lash dtd 7/10/85
2. USGS Monitoring Well
Locations

cc. Dr. Terry R. Lash
US Ecology
Mark Wetterhahn
Robert Rader



STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY
1035 OUTER PARK DRIVE
SPRINGFIELD 62704
(217) 546-8100

TERRY R. LASH
DIRECTOR

DAN L. WILLIAMS
DEPUTY DIRECTOR

July 10, 1985

Mr. Larry Toler, District Chief
United States Geological Survey
102 East Main Street, 4th Floor
Urbana, IL 61801

Dear Larry:

The Department is actively pursuing decommissioning of the Sheffield low-level radioactive waste disposal site. While the steps necessary to accomplish this decommissioning are still being negotiated by the Department, US Ecology and the U.S. Nuclear Regulatory Commission (NRC), it is likely that application of a final cap will be required. This will necessitate removal of all structures on the site, in order to eliminate all controllable releases of radionuclides. One structure which concerns the Department is the tunnel built by the United States Geological Survey (USGS) which has been proven to be a conduit for releases of radionuclides.

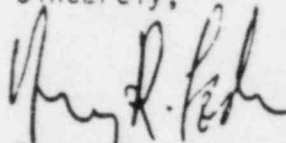
In a letter dated April 17, 1978 (copy attached), J.S. Cragwell, Jr., Chief Hydrologist for USGS made a commitment to use "the best available technology to remove and plug" any USGS structures on the Sheffield site. This would include observation wells, the tunnel, and any and all support structures. Since the studies that use these structures will be completed in September, 1985, I am requesting that these structures be removed and plugged to prevent the possibility of unnecessary leakage of radionuclides. I am further requesting that these activities be completed by the end of October, 1985.

In this regard, please submit within 60 days to this Department a plan for removing and plugging the USGS structures on the Sheffield site. This plan should provide detailed information on the technologies you plan to use to accomplish this task.

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Mr. Larry Toler
July 10, 1985

If you have any questions on this matter, please contact Mr. David Flynn of the Department's Office of Environmental Safety. Thank you for your continued cooperation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Terry R. Lash". The signature is stylized with a large, looped "T" and a cursive "Lash".

Terry R. Lash
Director

TRL:aes

USGS Monitoring Well Locations Considered to be an Integral Part
of Post Closure Monitoring and Surveillance of the Sheffield LLWDF

<u>USGS Well Number</u>	<u>Location</u>
511 or 548	West of Site
519	Vic. Tr. 18
520	Vic. Tr. 18
513	North of Site
514	North of Site
515	North of Site
518	North of Site
554,555,556,557,516 (one only)	North of Site
535 or 550	North of T-23
539 or 538	North of T-14
549 or 529	South of T-14
531	South of SW Corner
530	South of Trench 11
510	South of SW Corner
523	South of Trench 11
524	South of Trench 11
527	South of Trench 11
537	East of Site
504	East of Site
505	East of Site
564	NE of Site
5-6	Wells in Preferential Migration Pathway NE of Site
3-4	Wells, including 602, between SE corner of site and strip mine pond

Note: These USGS wells in conjunction with other wells on and in the vicinity of site would be part of a post closure monitoring plan. Sampling locations may be reduced at the end of a post-closure observation period.