

February 26, 1997

Mr. Richard Sena, Acting Director
Environmental Restoration Division
Uranium Mill Tailings Remedial Action
Project
U.S. Department of Energy
2155 Louisiana NE, Suite 4000
Albuquerque, NM 87110

SUBJECT: COMPLETION REPORT FOR THE LOWMAN, IDAHO VICINITY PROPERTY LO-021S

Dear Mr. Sena:

The U.S. Nuclear Regulatory Commission staff has completed its review of the page changes of the completion report for the Lowman, Idaho Vicinity Property LO-021S, submitted by the U. S. Department of Energy (DOE) by letter dated December 10, 1996. Based on its review, the staff has identified that DOE has not properly addressed the open issues as discussed in the enclosure. These issues were identified earlier in our letter dated February 23, 1995.

In order to support a timely review, please provide within 30 days of the date of this letter all of the necessary information as discussed in the enclosure. If you have any questions concerning this letter or the enclosure, please contact the NRC Project Manager, Mohammad Haque, at (301) 415-6640.

Sincerely,

(Original signed by)
Daniel M. Gillen for

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

Enclosure: As stated

cc: W. Woodworth, DOE Alb
S. Hamp, DOE Alb
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NRC STAFF EVALUATION OF DOE RESPONSE TO COMMENTS ON
LOWMAN, IDAHO VICINITY PROPERTY LO-021 COMPLETION REPORT

COMMENT 1: Page six of the report indicates that five trees are in areas included for supplemental standards, but drawing 017 indicates four trees. If the gamma readings for location 3SS indicate contamination, that area and volume should be added to those of locations 1SS and 2SS and the appropriate pages revised.

DISCUSSION: DOE revised page 6, and provided it to the NRC. The revision in Section 3.1.3 on page 6 indicated that there were three trees and a large bush in the area. In addition, DOE's response indicated that Tables 3.4 and 3.5 would be added and Note 1 on Drawing LO-017 would be revised; but, these were not provided. DOE also indicated that the gamma reading at location 3SS was not elevated and thus that area did not need to be included in the supplemental standards application.

STATUS: DOE should provide Tables 3.4 and 3.5 and the revised Drawing LO-017, as proposed.

COMMENT 2: Page six refers to the gamma exposure allowed to the general public under 10 CFR 20.105. The report is dated September 26, 1994, and should refer to 10 CFR 20.1301 which was effective January 1, 1994. Also, Appendix B of the report contains a copy of the old regulation and this should be removed, or replaced with the current regulation.

DISCUSSION: Page 6 was adequately revised and provided to NRC. The old regulation is to be removed from Appendix B.

STATUS: No further action is required.

COMMENT 3: It is recommended that DOE attempt once more to obtain the owner's comments and the State's concurrence on the application, as required by the 40 CFR 192.22.

DISCUSSION: DOE indicated in its response that it would provide a copy of the State's letter and a copy of the letter sent to the property owner. Neither was provided. DOE also indicated that another 8 or 9 pages would be added or revised, but these were not provided. Among these proposed changes, NRC staff noted that Sections 3.1.2 and 3.2.2 would be altered to indicate that the grab air sample results of less than 0.01 WL met the DOE guideline for estimating the annual WL average to be less than 0.03. However, the Uranium Mill Tailings Remedial Action Project should meet 40 CFR 192.12(b) that states "... and reasonable effort shall be made to achieve, an annual average (or equivalent) radon decay product concentration (including background) not to exceed 0.02 WL."

STATUS: DOE should provide appropriate page changes and additions for the CR including discussion demonstrating that the grab sampling results for this property provide reasonable assurance that the structure's annual average WL does not exceed 0.02.

ENCLOSURE