

~~Return to WMUR 467-SS~~

DISTRIBUTION:

WM-41

APR 30 1982

41/WMS/82/04/15/0

- 1 -

WMUR:WMS
WM-41

Robert W. Ramsey, Jr., Program Manager
Remedial Action Programs Office
Office of Nuclear Energy, NE-301
U.S. Department of Energy
Washington, D.C. 20545

WM Record File

WM Project 41

Docket No. _____

PDR ☒

LPDR _____

Distribution: _____

(Return to WM, 623-SS)

Dear Mr. Ramsey:

We have reviewed the DOE Environmental Assessment (EA) for remedial action at approximately 100 Vicinity Properties associated with the UMTRAP Vitro Processing Site in South Salt Lake City, UT. This EA was provided by our copy of the January 27, 1982 memorandum to you from Richard H. Campbell, Project Manager, UMTRAP Project Office, DOE-AL. The primary purposes of our review were to provide you with our comments on the EA and our overall judgement regarding the adequacy of the EA in assessing the environmental consequences of remedial action at all of these vicinity properties. In addition, we wanted to identify those individual vicinity properties specified by the EA which we consider to be unusually significant in the sense that we feel it necessary for the NRC staff to individually review and concur in their remedial action plans. For the remainder of the specified Vitro Site vicinity properties, we feel that our review of the EA coupled with our continuing participation as a NEPA cooperating agency in the preparation of the Vitro Processing Site EIS will suffice to fulfill our UMTRCA Title I responsibilities to review and concur in the selection of UMTRAP remedial actions, provided only that there is no exception from applicable EPA standards.

By Attachment I we are providing our comments on the EA and its adequacy as the required environmental documentation for the proposed vicinity property remedial actions. On Attachment II we have individually identified the unusually significant Vitro Site vicinity properties as discussed above. We thus anticipate receiving the individual remedial action plans for the Attachment II properties for our review and concurrence. We intend on adding to the Attachment II list as appropriate, when the remaining vicinity properties are identified and sufficiently characterized.

DIST:

TICKET NO:

OFC :	:	8601230546 820430	:	:	:
NAME :	:	PDR WASTE	:	:	:
DATE :82/04/15	:	WM-41	:	PDR	:

94

APR 30 1982

41/WMS/82/04/15/0

- 2 -

From an overall standpoint, and excluding the Central Valley Water Reclamation Facility (CVWRF) not covered by the EA, we would caution that the DOE should assure itself that the approximately 100 properties covered by the EA encompass the vast majority of tailings relocated by various means from the Vitro Site to vicinity properties. Otherwise a meaningful assessment of environmental consequences may not be presented by such an EA. Provided this is the case, we feel the EA generally to be an adequate environmental review document to assess the consequences of remedial action at those Vitro Site vicinity properties covered by its scope.

Sincerely,

181

Ross A. Scarano, Chief
Uranium Recovery Licensing Branch
Division of Waste Management

cc: (w/attachments)
Richard H. Campbell, DOE-AL
Dr. William E. Mott, DOE-HQ
Robert J. Stern, DOE-HQ

Case Closed: (33000041050E)

DIST:

TICKET NO:

OFC	WMUR	WMUR	WMUR				
NAME	W. J. Duffer	DE Martin	RA Scarano				
DATE	81/04/20	4/29/82	4/30/82				

ATTACHMENT I
NRC STAFF COMMENTS ON DOE
VITRO SITE VICINITY PROPERTIES
ENVIRONMENTAL ASSESSMENT (EA)

1. Sec. 1.2 (p. 2) - To our knowledge, no final and documented determination has been made regarding the environmental impact assessment for the DOE proposed partial cleanup of the Central Valley Water Reclamation Facility (CVWRF) where an exception from meeting EPA Standards may, and probably will, be required. The NRC staff has reviewed preliminary CVWRF remedial action documentation, advised the DOE that it found it seriously lacking, and the documentation has not yet been resubmitted to NRC in revised form for our review and concurrence. We certainly consider the CVWRF to be an unusually significant vicinity property, containing more tailings than any other single vicinity property, and thus would normally have included it on Attachment II. We understand though that this EA has been scoped purposely to exclude it from consideration since its remedial action plan development is already being handled separately.
2. Sec. 1.2 (p. 4) - The Vitro Site vicinity property cleanup cost estimate provided to NRC staff at the January 27, 1982 DOE/NRC Vitro Site PDEIS meeting was approximately \$11M (including engineering). We do not understand why vicinity property construction costs alone are noted in the EA as up to \$25M (apparently even excluding the CVWRF).
3. Sec. 1.2 (p. 4) - In our judgement, not all vicinity property materials would have to be already on the Vitro Site before the processing site remedial action could begin, even if the processing site tailings were to be stabilized in place. Surely a significant parallel effort between the two activities can be projected even assuming stabilization in place..
4. Sec. 1.3.2 (p. 5) - We feel that Alternative 2 (in effect, a scheme approximating stabilization in place at each vicinity property) would be inconsistent with the intent of Title I of UMTRCA to minimize, in a conclusive manner, the potential health hazard due to tailings removed from inactive sites. Overall, the thousands of UMTRAP vicinity properties may subsequently require a permanent

and inordinately large environmental monitoring and administrative organization to implement and assure that the Alternative 2 radiation control remained "in-place". Alternative 2 also exhibits the potential for each vicinity property being considered as a disposal site, and therefore technically subject to licensing by the NRC.

5. Sec. 3 and Appendix D (in general) - Throughout these two key sections it is not clear whether the results presented numerically in the text are risks to worker individuals, to the total of workers, occupants, and residents associated with the vicinity properties, or to the total Salt Lake City area population. This should be clarified at each point where a numerical value is presented.
6. Sec. 3.1 (p. 15) - Because vicinity property remedial actions will be carried out over an extended period (5 yrs assumed for EA calculations), this section should also estimate exposures to the general public in the Salt Lake City area. This would appear even more important considering the EA's characterization of the area as dry and prone to high winds.

The risk to a worker would appear to be a one in 500 chance of a case of lung cancer. We do not view that risk as "highly unlikely", especially given that these projects may require a large number of workers over an extended period. We note for example that if 1,000,000 remedial action man hours (p. 22) is required over an estimated 5 yr period, this equates to 500 workers for 5 yrs. It would appear therefore that at least one case of lung cancer among the workers is to be expected.

7. Sec. 3.14 (p. 23) - The remedial action operations protocols to be developed should be submitted for NRC review and concurrence. In this manner, we can provide a generic concurrence that will apply to a number of properties and which could then be utilized, modified only by site specific factors, at other UMTRAP sites. This would fulfill part of our UMTRCA Title I requirement to concur in the performance of remedial action at vicinity properties. We are assuming that the protocols are different documents, since they are not yet prepared, from the Salt Lake City generic Radiological Control Plan (RCP) and Health Physics & Safety Plan (HP&SP), on which we previously provided review and comments.

8. Sec. 4.2 (p. 27) - The excess health effect (cancer) to workers is stated as 0.001 (gamma) and 0.0012 (radon) here, whereas it appears to be stated as 0.001 and 0.002, respectively, on p. 16. This inconsistency should be explained.

ATTACHMENT II
NRC STAFF IDENTIFICATION OF UNUSUALLY
SIGNIFICANT VITRO SITE VICINITY PROPERTIES^a

	<u>Tailings (yd³)</u>
1. Ice Cream Manufacturing Plant (2575 So. 300 W.)	13,000
2. Commercial Location (2565 So. 300 W.)	13,000

-
- (a) This list is based only on review of the 23 properties already included on the official list for remedial action (excluding the Fire Station and CVWRF properties). Other vicinity properties may be added to this list after they are identified and characterized sufficiently.