

April 4, 1997

MEMORANDUM TO: Deborah DeMarco, Technical Assistance Project
Manager, RMB/NMSS

FROM: Daniel M. Gillen, Assistant Branch Chief, URB/DWM

SUBJECT: TRANSFER OF MONEY FROM TASK 2 TO TASK 4; CONTRACT NRC-02-96-
004, JOB CODE J5147

Task 2 - "Annotated Outline of Groundwater Chapter of Uranium Recovery Title I and Title II Reclamation Standard Review Plan" supports the development of groundwater chapter of Standard Review Plan (SRP) under Task 4. Originally under Task 4, only one groundwater chapter was to be developed for the SRP for both Title I and Title II site reclamation reviews. DWM saw a potential for confusion between Title I and Title II reviews if review procedures for both were presented in a single chapter in the SRP, and decided that two separate SRP chapters should be developed for Title I and Title II sites. This change in scope of work under Task 4 involves some additional effort to produce two separate chapters. Therefore it is recommended that \$ 2,702.73 left in Task 2 be transferred to Task 4.

The revised Statment of Work indicating the change in the scope of work is attached. The estimated staff effort for this task has been revised from 420 staff hours to 440 staff hours. The additional 20 hours is the estimated staff effort needed to produce two sepearte review plans instead of a single review plan.

Should you have any questions, please call me at 415-7295 or Banad Jagannath at 415-6653

Encl.: as stated

cc: J. Holonich
B. Jagannath

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REVISED STATEMENT OF WORK, APRIL 4, 1997

TASK NO. 04 TITLE: GROUND-WATER CHAPTER OF URANIUM RECOVERY TITLE I AND II RECLAMATION STANDARD REVIEW PLAN

JOB CODE	J5147
NRC ISSUING OFFICE	NMSS
NRC PROJECT MANAGER	DEBORAH DEMARCO, 415-7796
NRC TECHNICAL MONITOR	WILLIAM FORD, 415-6630
DOCKET NUMBER:	NONE
TAC NUMBER:	L50032
FEE RECOVERABLE:	NO

1.0 Background

Before a conventional uranium processing site is restored a reclamation plan that describes planned restoration activities is reviewed by NRC staff. This is true for Title I facilities (U.S. Department of Energy) and Title II facilities (commercial). To help the staff review these documents the NRC staff has prepared a standard review plan for reclamation activities. However, this review plan needs to be updated with respect to ground-water restoration activities.

2.0 Objective

The objective of this task shall be to prepare a ground-water chapter of the reclamation standard review plan for Title I and Title II sites. In order to avoid any confusion between review details for Title I and Title II sites, it has been decided to produce two independent chapters of groundwater review plans. Included in the review plan shall be a review effort focused on ground-water corrective actions or alternate concentration limits.

3.0 Technical Qualifications Required

The CNWRA shall provide the services of geohydrologists and geochemists who have an understanding of ground-water movement, chemistry, and transport associated with uranium mill tailings disposal sites. Familiarity with the Nuclear Regulatory Commission regulatory process is required.

4.0 Level of Effort

The estimated effort for this revised task is 440 staff hours (0.2 FTE).

5.0 Completion Date

Approximately 6 to 7 months will be required to complete the task.

6.0 Scope of Work

1. Using the previously prepared annotated outline the CNWRA staff shall identify the regulatory and environmental requirements from 10 CFR Part 40, Appendix A, Criteria, 5, 7, and 13 and relevant sections of 40 CFR Parts 192 Subparts A through E and 40 CFR Part 264 that are related to the applicable section of the review plan and need to be met;

by using appropriate information gathered from:

- (a) NRC files.
- (b) U.S. Environmental Protection Agency regulations and guidance.
- (c) the public literature.

2. As the Standard Review Plans proceed through "significant" revisions CNWRA staff shall provide copies of the current draft to the NRC. It is not expected that these drafts shall be formal deliverables to the NRC, but shall be sent by FAX and e-mail, with the purpose of maintaining an active dialogue between CNWRA and NRC staff.
3. A draft of the Acceptance Criteria Section shall be prepared which includes qualitative and quantitative options for acceptance criteria. NRC staff will review these drafts and provide the CNWRA guidance on which options shall be specified in the review plan. However, while the NRC staff conducts it's review; work would not stop on preparation of the review plan. Only options selected shall be incorporated into the review plan.
4. A draft of the Conclusions Section shall be prepared that includes a short, one to three paragraph conclusion that needs to be made concerning the regulatory requirements identified under item 1. NRC staff will review these drafts, but while the NRC staff conducts it's review; work would not stop on preparation of the review plan.
5. The CNWRA shall prepare drafts of the review plans that contain quantitative and qualitative options for review criteria and procedures that could be acceptable in meeting the requirements identified under item 1 above and support the conclusions identified in item 4. Options that are identified shall be based on (1) previous NRC review precedents, (2) operational experience, (3) inspection results, and (4) information outlined in item 1 above. All options identified must be directly within NRC's regulations. The NRC staff will provide the CNWRA guidance on which option will be incorporated into the final review plan. Therefore, the final review plan shall have only those review criteria and procedures the staff wants to adopt in it's formal review process. NRC staff will review these drafts, but while the NRC staff conducts it's review; work would not stop on preparation of the review plan. It is anticipated that the NRC staff will communicate it's review observations in active dialogue with the CNWRA staff and not through formal review transmittals.
6. Final draft provided to NRC staff.
7. NRC staff reviews final draft.
8. CNWRA staff prepare final review plans that are camera ready for publication by NRC as a NUREG.

7.0 Meeting and Travel

Many NRC records, which cannot be readily provided, may have to be researched. Therefore, some trips to search the NRC records may be necessary. It is estimated 1 one person trip of one week duration to Washington D.C. may be required.

One trip to Washington DC may be required to discuss NRC comments on the "final draft". It is estimated that this trip might require 1 individual's time for 2 days in Washington D.C.

8.0 NRC-Furnished Materials

The NRC will furnish materials as requested by CNWRA staff or the CNWRA staff shall have to travel to Washington DC or Austin Texas to access the public document rooms.

9.0 Schedule

The following schedule of the staff time required is based on estimates of time intervals to accomplish this task. The time required to obtain responses from NRC staff for various phases is estimated under the response column.

Calendar Time To Accomplish Tasks

	CNWRA Staff <u>(Weeks)</u>	Response <u>(Weeks)</u>	Deliverable(s) (Weeks from <u>Contract Award</u>)
Literature research -	7		
Drafts of Acceptance Criteria and Conclusions Sections prepared.	11		18
Final Draft Prepared	3		22
NRC staff review of final draft		3	
Final Review Plan chapters	3		28

10.0 Technical Direction

Technical instructions may be issued from time to time during the duration of this task. Technical instructions shall not constitute new assignments of work or changes of such nature as to justify an adjustment in cost or period of performance. Directions for changes in the scope of work, cost, or period of performance shall be coordinated through the NMSS Project Manager.