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DEC 05 1985

URFO:SLW
Docket No. 40-181
0400181301E

Mr. John Themelis
U.S. Department of Energy
Albuquerque Operations Office
P.O. Box 5400
Albuquerque, New Mexico 87115

Dear Mr. Themelis:

As stated in our letter of November 12, 1985, the Uranium Recovery Field Office (URFO) review of the Processing Site Characterization Report (PSCR) had been delayed, but our comments would be transmitted by November 30, 1985. We have now completed our review of the PSCR for the mill tailings site at Lakeview, Oregon, and our specific comments are enclosed with this letter.

If you have any questions regarding our comments, please contact me or Edward F. Hawkins.

Sincerely,

/s/

R. Dale Smith, Director
Uranium Recovery Field Office
Region IV

Enclosure: As stated

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OFC	: URFO	: URFO	: URFO	:	:	:	:
NAME	: SWastler/lv	: EHawkins	: RDSmith	:	:	:	:
DATE	: 85/11/19	: 85/11/19	: 12/5/85	:	:	:	:

Comments on the
Processing Site Characterization Report (PSCR)
Lakeview, Oregon

Hydrology

1. The table on page 165 represents pump test methods utilized in calculating parameters from wells at the mill site. Along with the pump test methods are their associated results which include transmissivity, storage coefficient, and hydraulic conductivity. It is unclear as to how the arithmetic mean relates to actual field responses when they are so variable. This variability is displayed for multiple pump test methodology conducted at individual wells, with limited or poor correlative results. These uncorrelative results are shown for each set of pump tests in Table 5.4, page 165.

The conclusions and values from the data presentation in Table 5.4 are not adequate. Page 83, paragraph 1, states that the arithmetic mean for transmissivity of the shallow zone is 33.7 ft²/day and that of the deep zone is 103.4 ft²/day. These values are neither practical or useful for hydrological purposes.

An example trending toward more correlative results are the set of tests for the shallow zone incorporating wells 519 and 521 and the deeper zone incorporating wells 520 and 512, rather than grouping all the test results together to show the arithmetic mean, etc. The latter has very little usefulness when trying to understand or interpret the subsurface hydrological environment.

It should be noted that there are not always clear-cut explanations or values that can be ascertained from field testing, but in such cases, the more correlative results should be the basis for interpretation and analysis.

The key to a sound ground-water protection strategy is the ability to extrapolate meaningful values from resultant test data. Values similar to ones discussed previously would be more appropriate for practical field application. Therefore, submit new ground-water values that more clearly reflect the hydrologic regime existing at the processing site.

2. Pump test values for parameters in Table 5.4 do not include horizontal hydraulic conductivity. Submit the associated values for hydraulic conductivity (horizontal) as an amendment to the Table 5.4, page 165. This is to include values for both shallow and deep testing zones.