

April 30, 2002

Mr. Donald Metzler, Technical/Project Manager
U.S. Department of Energy
Grand Junction Office
2597 B3/4 Road
Grand Junction, CO 81503

SUBJECT: COMMENTS - DRAFT SITE OBSERVATIONAL WORK PLAN FOR THE
GREEN RIVER, UTAH, UMTRA PROJECT SITE

Dear Mr. Metzler:

By letter dated February 19, 2002, you submitted the U.S. Department of Energy's Draft Site Observational Work Plan (SOWP) for the Uranium Mill Tailings Remedial Action Project site at Green River, Utah. The staff reviewed the Green River SOWP and found the document complete and comprehensive. Staff identified three comments, included as an enclosure, for your consideration in completing the final SOWP.

If you have any questions regarding this letter, please contact Ted Johnson, the Project Manager for the Green River site, at (301) 415-6658 or by e-mail to tlj@nrc.gov.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm.html> (the Public Electronic Reading Room).

Sincerely,

/RA/c/GSJ

Daniel Gillen, Chief
Fuel Cycle Facilities Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Enclosure: Comments

Docket No.: WM-68

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NAME	TJohnson*	JMuszkiewicz	MLayton	GJanosko	DGillen for
DATE	4/25/02	4/25/02	4/25/02	4/26/02	4/30/02

*See previous concurrence

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**COMMENTS ON THE
DRAFT SITE OBSERVATIONAL WORK PLAN
FOR THE GREEN RIVER, UTAH, UMTRA PROJECT SITE**

1. Earlier DOE documents for the Green River disposal cell hypothesized a mechanism called “water harvesting,” to explain the increasing concentrations of some tailings constituents in the ground water near the disposal cell. DOE indicated that water harvesting occurred when run off from the disposal cell accumulated in the anchoring trench for the rock cover and seeped into the shallow ground water, carrying re-dissolved constituents. The final SOWP should discuss any outcomes of DOE’s efforts to verify the occurrence of water harvesting at the site.
2. DOE discusses the installation of several new wells and the replacement of one well currently designated as a Point of Compliance (POC) well. A modification to the existing Long Term Surveillance Plan must be submitted for NRC review and approval before any such well replacement occurs.
3. DOE indicated that it plans to initiate several studies to identify potential fracture zones near the disposal cell. Few details were provided on these future studies. DOE should consider performing pumping tests on selected wells to evaluate potential anisotropy caused by fractures, and examine the potential use of surface geophysical methods such, as geoelectric imaging, for locating and evaluating fracture zones.