



**U.S. Department of Energy**  
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WM-61

Received: 9/4/03

Ms. Susan Frant, Chief  
Fuel Cycle Facilities Branch, NMSS  
U.S. Nuclear Regulatory Commission  
Mail Stop T8A33  
Washington, D.C. 20555-0001

**Subject: Monitor Wells at the Gunnison, Colorado, UMTRA Project Site**

Dear Ms. Frant:

The Gunnison processing site has been characterized and the proposed ground water clean up strategy is natural flushing in conjunction with compliance monitoring and institutional controls. A long-term monitoring network consisting of 13 U.S. Department of Energy (DOE) monitor wells, along with 4 surface water locations and 7 domestic wells, has been established in the Site Observational Work Plan (SOWP), March 2001. The monitoring program has also been documented in the Ground Water Compliance Action Plan, July 2001. Annual sampling, according to this plan, was initiated at the Gunnison site in May 2001.

Based on comments by the U.S. Nuclear Regulatory Commission (NRC) (letter to DOE of January 29, 2002) and the Colorado Department of Public Health and Environment (CDPHE) on the SOWP, DOE plans to install two additional monitor wells into the intermediate and deep zones of the alluvial aquifer downgradient from the Gunnison processing site to better evaluate the extent of the site-related plume in ground water and assess predicted cleanup through the natural flushing process. Of specific concern is the area where ground water flow and transport modeling has predicted that uranium concentrations may exceed the U.S. Environmental Protection Agency standard at 100 years (Figure 2 of Appendix H, SOWP). DOE is preparing to implement this request during FY 2004 and would like confirmation from NRC and CDPHE that this action will address the comments and provide an acceptable long-term ground water monitoring network in the vicinity of the Gunnison site.

In conjunction with this, DOE proposes to decommission 46 existing DOE monitor wells in the vicinity of the site not included in the proposed monitoring network (see attached Figure and Table). It is recommended that these monitor wells be decommissioned (in accordance with UMTRA Ground Water Project and State of Colorado regulations) in the interest of protecting ground water in the alluvial aquifer, removing unneeded wells from private property, minimizing access agreements and related expenses, and decreasing DOE liability. DOE would like to perform the monitor well decommissioning activities simultaneously with the installation of the new monitor wells for efficiency and cost-effectiveness, involving only one mobilization of drilling equipment to perform all tasks at the site. If regulatory approval is not granted for the decommissioning phase of the program, DOE may consider deferring installation of the new

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monitor wells until a later time when regulatory concurrence is received for the proposed monitoring program, and both activities may be performed concurrently.

In order to expedite this process, DOE would appreciate your input and concurrence on this plan early in FY 2004 to allow for issuance of a *Statement of Work and Request for Proposal* for the combined fieldwork in June 2004, and the award of a drilling contract by August 2004. Work could then commence in the field in early September 2004 (dependent on when irrigation flooding of the pasture southwest of the site is discontinued for the year).

It is suggested that this should be a topic of discussion during the Gunnison site visit on September 11, 2003, with NRC and CDPHE. If you have any questions, please contact me at 970/248-7612.

Sincerely,



Donald R. Metzler, P.Hg.  
Program Manager

Enclosures (2)

cc w/enclosures:

W. Naugle, CDPHE

R. Linton, NRC

B. Von Till, NRC

A. Kleinrath, DOE-GJO

C. Bahrke, Stoller

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Project File GWGUN 3.2.3 (Thru R. Burrows)

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