



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20545-0001

June 10, 1998

Mr. Frank Bosiljevac
ERD-UMTRA
U.S. Department of Energy
Albuquerque Operations Office
P.O. Box 6400
Albuquerque, New Mexico 87185-5400

SUBJECT: COMMENTS ON LONG-TERM SURVEILLANCE PLAN FOR THE GREEN RIVER, UTAH, URANIUM MILL TAILINGS REMEDIAL ACTION PROJECT SITE

Dear Mr. Bosiljevac:

The U.S. Nuclear Regulatory Commission (NRC) staff has completed its review of the U.S. Department of Energy's (DOE's) "Long-Term Surveillance Plan [LTSP] for the Green River, Utah Disposal Site," dated May 1998. Based on this review, the NRC staff has identified the following issues that require additional information and clarifications to be provided:

- Until such time as the DOE, the U.S. Army Corps of Engineers, and the U.S. Department of the Army complete the final perpetual easement agreement, documentation of the DOE's waiver of ingress/egress requirements from the U.S. Department of Justice should be included in Attachment 2 to the LTSP.
- It is not clear whether a right-of-access agreement with the State of Utah was necessary. The DOE should provide documentation of any such agreement in the LTSP; and
- The legal description of the final disposal site boundary provided in Attachment 2 to the LTSP and on Plate 2 do not agree. The DOE should indicate which description is correct and modify the document appropriately.

In addition, the DOE should clarify the total area encompassed by the final site boundary based on the correct legal description, as different values are provided in Section 1.3 and Attachment 2 of the LTSP.

Additional editorial comments are provided in the enclosure.

These issues and comments must be resolved before NRC can place the Green River disposal site under the general license at 10 CFR 40.27 for long-term care.

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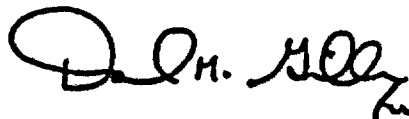
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F. Bosiljevac

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If you have any questions concerning this letter or the enclosure, please contact Mr. James Park, the NRC Project Manager for the Green River site, at (301) 415-6699.

Sincerely,

A handwritten signature in black ink, appearing to read "J. J. Holonich".

Joseph J. Holonich, Chief
Uranium Recovery Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. WM-68

Enclosure: As stated

cc: W. Sinclair, UT
D. Metzler, DOE/GJO
W. Woodworth, DOE/Alb

Editorial Comments on the U.S. Department of Energy
"Long-Term Surveillance Plan for the Green River, Utah Disposal Site" (May 1998)

1. DOE states in Section 1.3 (p. 1-2) that the legal land description for the state-owned land boundary is provided in Attachment 2 to the LTSP. However, this description is not provided as stated. The LTSP should be revised appropriately to address this inconsistency.
2. The thickness of the combined riprap A and filter bedding layer of the erosion cover is given as 1.0 feet (0.3 meters) in Figure 2.3 (p. 2-7). This thickness is inconsistent with the description provided in the text (p. 2-6) and with the detailed drawing shown in Figure 2.4 (p. 2-8), where, in both locations, it is given as 1.5 feet (0.45 meters). This inconsistency should be resolved.
3. In Section 5.4 (p. 5-9), the text refers to quality assurance procedures described in the text. However, no procedures are identified or provided. This inconsistency should be resolved.
4. On p. 7-2, DOE states that, following a preliminary assessment of potential damage or disruption to the disposal site during an unscheduled inspection, it will prepare and submit a correction action plan to NRC within 60 days, in accordance with requirements in 10 CFR Part 40. The NRC staff is not aware of any requirements in 10 CFR Part 40 that require such a plan within the stated time period. The DOE should clarify this discussion.
5. DOE refers to Attachment 3 of the LTSP as (1) the location for the permanent site file index (p. 3-1), and (2) the location for the documents identified to be transferred to GJO for the long-term surveillance program (p. 10-2). It is not clear whether these two descriptions of the attachment are consistent. In any case, Attachment 3 to the LTSP is empty. These apparent inconsistencies should be resolved.
6. The DOE/Grand Junction Office Quality Assurance Program Plan is described in Section 12.0 (p. 12-1) and referenced as (DOE, 1992d). However, Section 14.0 (References) of the LTSP has not been updated to reflect this document. This inconsistency should be resolved.

Enclosure

F. Bosiljevac

- 2 -

June 10, 1998

If you have any questions concerning this letter or the enclosure, please contact Mr. James Park, the NRC Project Manager for the Green River site, at (301) 415-6699.

Sincerely,

[D. Gillen for]

Joseph J. Holonich, Chief
Uranium Recovery Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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cc: W. Sinclair, UT
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