

ANDREA BEATTY RINKER
Director

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WM DOCKET CONTROL CENTER STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

86 Mail Stop PV-11 SEP 10 P3:32 Olympia, Washington 98504-8711 • (206) 459-6000
August 27, 1986

WM Record File 101 WM Project 10
Docket No. _____
PDR
LPDR

Mr. Lee Olson, Project Manager
Basalt Waste Isolation Project
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Distribution:
REB MJB Linehan
JOB Hildenbrand
(Return to WM, 623-SS) Hale
FROM: COLE - NRC

Dear ^{Lee} Mr. Olson:

It has come to my attention that USDOE and Rockwell may soon initiate radioactive tracer and pump tests at well DC 23. If this is true it concerns me because you did not notify us of this activity, and you did not provide the state of Washington timely and complete information regarding this testing as required in Section 117 of the Nuclear Waste Policy Act.

We have not received specific details about your planned testing, but it appears the proposed tracer and pump tests are in conflict with the following:

- Section 113(c) of the Nuclear Waste Policy Act which places specific restrictions on the use of radioactive material during site characterization.
- The agreement made at the May 7 USDOE/States/Tribes meeting and confirmed at the August 13 USDOE/States/Tribes meeting. At both meetings, USDOE agreed not to start new work at federal sites until the states had an opportunity to review the 15-20 page document which describes ongoing work. In addition, USDOE agreed to consult with the states prior to beginning new work.
- The general stop work order issued to Rockwell Operations on May 13, 1986.
- The Hydrologic Test Strategy agreement with NRC and the state of Washington which calls for a consensus on the hydrologic baseline before pump tests are initiated.
- State of Washington water quality and water rights laws and regulations which preclude contamination of groundwaters.

In addition, the need to monitor and differentiate the source of environmental contamination from a repository or from defense wastes was a major comment on the Defense Waste DEIS and the EMMP annotated outline. We are concerned that your use of radioactive

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tracers, rather than the conventional tracers, may destroy the baseline for radioactive iodine.

Even if these legal and procedural obstacles can be resolved, the state will have continuing strong objections to the use of any radioactive tracer in the basalt aquifers. On many occasions, and most recently in our response to the Defense Waste DEIS, we have expressed concern over the ability to perform postclosure monitoring of releases from a deep repository. Such monitoring would logically be performed at depth and in the aquifers now involved in hydraulic testing. Iodine-131/129, in fact, would be one of the most objectionable radionuclide tracers, since it would occur in the leading edge of a release plume from the repository. It would be essential to postclosure monitoring to have an iodine baseline in each of several aquifers above the repository, and the deliberate introduction of radioiodine today could destroy that baseline. Since there are adequate synthetic organic tracers available, they should be seriously considered for use in any proposed tracer tests. We are available and willing to work with you in the future planning of such tests.

Please provide us with the rationale for and the description of these tests. Thank you for your anticipated cooperation.

Sincerely,



Terry Husseman, Director
Office of Nuclear Waste Management

TH:kc

cc: Warren Bishop