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To: "Stephen Cohen" <SJC7@nrc.gov>
Date: 12/23/05 1:26PM
Subject: RAMC December 7 Submittal

Stephen,

I reviewed the RAMC December 7th submittal.

Overall, it looks much better than previous ACL submittals for non radionuclides.

My comments are as follows:

1. Page 3-4, methodology for ACL. RAMC should provide the data sets rather than simply results in Table 1. The values presented in Table 1 and subsequent tables appear reasonable, but it is not possible to review which wells and data were selected for the statistical analysis.
2. Page 5, 4th paragraph. RAMC cites a retardation factor for sulfate of 1.5. What is the basis for a retardation factor for sulfate?
3. Page 7, Table 2. RAMC proposes ACLs for the Dakota, TRA and TRB. When compared to measured results from wells, the Dakota and TRA appear to be okay, but one well for TRB may be problematic. For the Dakota it looks to be okay, while wells 36-01 and 36-04 have had values close to but below for Cl, SO₄ and TDS. For the TRB, well 31-66 has recently spiked and been erratic for Cl, SO₄ and TDS above the proposed ACLs. For the TRA, well 36-02 had two measurements in 1997 over for the Cl, however these values appear anomalous and look much different than previous and subsequent lab results.
4. Page 10, Bedrock 2nd paragraph. Does the sentence with "...exist upgradient of the northernmost..." read correctly? It may have been intended to say downgradient. Otherwise, explain the upgradient with respect to the site hydrogeology.
5. Page 10, Bedrock 3rd paragraph. With the exception of approved wells in the stability monitoring plan, RAMC proposes to abandon all other TRB, TRA and Dakota wells. NMED requires that RAMC seek approval before plugging and abandoning the remaining wells.
6. Page 11, Table 3. TRB well 36-01 has been dry recently, so it may be worth considering another well location. Otherwise, support that this is the best location, which in the future is anticipated to have more water.

As a clarification, the ACLs would apply to the POC wells only, correct?

KCM

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