

11/9/95

November 9, 1995

MEMORANDUM FOR: Robert C. Pierson, Chief
Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

FROM: Michael F. Weber, Chief
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management, NMSS

SUBJECT: TECHNICAL ASSISTANCE REQUEST REGARDING NFS

My staff has reviewed the request by Nuclear Fuel Services, Inc. (NFS), to include two former (20.304) onsite waste disposal areas under the scope of the Pond 4 remediation effort. The description of the proposed activities, contained in the letter from Andrew M. Maxin, NFS, to you dated September 22, 1995, were reviewed and compared to those activities described in the "Decommissioning/Interim Measures Workplan for the Pond 4 Area, Solid Waste Management Units 2, 4, and 6" (Pond 4 Workplan). It appears that the scope of work for the 20.304 disposal areas is within that of the Pond 4 remediation effort.

The activities described in the Pond 4 Workplan allow contaminated soil to remain, or be returned to, excavation areas after removal of contaminated debris. The decommissioning timeliness provisions of 10 CFR Part 70 became effective on August 15, 1994. These provisions require licensees to begin decommissioning any site area that contains residual radioactivity when no principal activities have been conducted in that area for 24 months. Unless an alternative schedule is approved, decommissioning activities should commence in the Pond 4 and 20.304 burial areas by August 15, 1996.

For the 20.304 disposal areas my staff recommends that NFS propose a plan to monitor the downgradient groundwater wells (104A, 105A, and 106A) for potential impact to groundwater from the remediation effort. My staff and I also recommend that the disposal areas (Pond 4 and 20.304) be completely remediated to unrestricted use levels rather than return contaminated materials to the excavations to be remediated again a short time later under the timeliness provisions. We suggest a meeting with NFS at NRC headquarters to have them describe their future remediation plans given the timeliness provisions, any long-term plans for the site, and any lessons learned from the Pond 4 decommissioning.

Docket: 70-143
License: SNM-124
Casework/RITS/TAC No.: 70-1439JOS/211AA/L30808

Contact: Jack Parrott, NMSS/DWM/LLDP
415-6700

TICKET: D95-577

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