

Breckenridge Disposal Site Meeting



June 22, 2006

Presentation to:
NRC

ENVIRON

Goals

- 2006
 - Finish site characterization
 - Develop Conceptual Remedial Action Plan
 - Develop cost estimate for Remedial Action Plan
- Remedial Action Plan
 - Cost effective
 - Protective of human health
- Remedial Action Plan Approach
 - Minimize soil volume removed from the Site
 - Minimize soil to be disposed of out of state

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May 12, 2006 Comment Letter


- Equilibrium of uranium progeny
- Distribution coefficients
- Derived concentration guideline levels (DCGLs)
- Ingestion pathway parameters

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 **Distribution Coefficients (Kds)**

- RESRAD default Kds are for sandy soils.
- Site soils are silty clay.
- Using RESRAD defaults would not be representative of site conditions.
- NUREG 6697 cites Sheppard and Thibault as a valid reference for Kds for specific soil types.

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 **Derived Concentration Guideline Levels (DCGLs)**

- We assume that the subsurface DCGLs will be no thicker than 2 feet and are covered with at least 4 feet of backfill.
 - Similar assumption to previous Dose assessment; however, data from Fall 2004 showed the overburden was less impacted than expected.
 - From Table 6 of the May 3, 2005 Submittal
 - All 48 samples significantly below revised subsurface DCGLs
 - From Table 7 of the May 3, 2005 Submittal
 - 100 out of 105 measurements were less than the Nal detection limit
 - Similar to Fall 2004 RA, the Remedial Action Plan will include the sampling of overburden material to ensure the assumption is representative of field conditions.

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 **Ingestion Pathway**

- The references for intake values in Table 5 of ENVIRON's April 25, 2006 submittal were mislabeled.
- The correct reference should be USEPA *Exposure Factors Handbook Volume I, General Factors*, EPA 600/P-95-002Fa, August, 1997.


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 Title 10 CFR Section 40.14 Exemption

- **§ 40.14 Specific exemptions.** (a) The Commission may, upon application of any interested person or upon its own initiative, grant such exemptions from the requirements of the regulation in this part as it determines are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest.

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 Title 10 CFR Section 40.14 Exemption

- A large cost in Fall 2004 RA was transportation to the Utah disposal facility
- A solid waste disposal facility operated by EQ in Belleville, MI was recently granted a permit modification to accept 10 CFR Section 40.14 exempted waste.
- The Trust would like to explore the possibility of receiving an exemption that would allow disposal at this facility.

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