

**From:** Amy Snyder  
**To:** Nardiaj@westinghouse.com  
**Date:** Wed, Mar 29, 2006 4:29 PM  
**Subject:** Response to Your Questions on Burial Pit Characterization

Joe,

It is acceptable for Westinghouse (WEC) to submit a separate license amendment application for additional characterization of the burial pits to include trenching, borings and limited removal and characterization of the waste materials, provided it is in parallel with the DP and the DP briefly notes that this is being done and describes how you will factor the results into the DP (i.e., evaluate the data and revisit the assumptions made in the DP to see if they are still valid or bounding, etc.).

I spoke with Tracy Chance this morning and he said that he thought that only dose measurements would be taken for characterization of the burial pits. I was confused and explained to him that I thought that WEC was going to take samples for radiological characterization as well as the treatability study. I also explained that earlier submittals of the DP state in many places that the technical basis documents will be developed after characterization data is collected. NRC needs to know when WEC plans on performing characterization for this purpose. I asked whether WEC would be taking samples for the treatability study and he did not know if WEC would be taking samples. NRC would also like to know what, if any, samples will be taken for the treatability studies and what the volume of the soil/waste material WEC is expecting to remove.

NRC expects that WEC provide a detailed license amendment package for burial pit characterization with detailed information to NRC:

- 1) so that staff can independently evaluate whether the work (characterization of burial pits and trenching for characterization purposes, etc.) can be done safely.
- 2) so that staff can determine what data you want to collect, why and its quality, and how this data will be used. You stated in earlier that characterization data will be used to determine such things as final status survey design, determine the ratio of radionuclides for final status survey design, etc. We expect that you clearly explain what data you are collecting under this proposed license amendment package and how you plan to use it. We suggest you use the DQO process (referenced in MARSSIM). We expect that your description will put the characterization effort into context with regards to the representativeness of the entire burial pit area. If you believe that it will not be representative of the entire burial pit site, then state the reasons why and state what you hope to gain from obtaining such data.
- 3) Identification of what additional data (characterization, remediation survey, etc.) WEC will obtain in the future and how such information will be related to the DP. Include a summary or description of what you do know about the characterization of the pits (vertical and horizontal extent of contamination and identification of contaminants). An Environmental Report or information for EA purposes is needed.
- 4) A description of the work to be conducted and for closure when needed samples are collected. We expect that the package will identify where the trenching/digging/subsurface work will occur and why.
- 5) Identification and description of the safety precautions, environmental controls and monitoring, solid and liquid waste handling strategies that will be needed for the work described in the plan.
- 6) Commitment to have detailed procedures to conduct such work.

We do not agree with that borings should be of limited depth. If you are going to perform limited borings, then how will you know when you have reached the buried material? Borings can provide access into the pits and is a common method to characterize the subsurface. If you believe that boring through the waste is unsafe, you will be asked to justify your conclusion and explain why it is safe to perform trenching, if you plan on trenching. Describe what you mean by unsafe; identify the potential consequences.

The additional characterization effort covered by the an approved license amendment may be conducted separately from the approval of the DP.

Regarding Final Status Survey: Provide the technical basis documents that you have to date. They are adequate to procede but WEC needs to tie them together (describe how they relate to each other in the DP). For example explain how the surrogate analysis tech document related to the instrumentation technical basis documents.

If you have any questions, please contact me. Also, the 1/25/06 Meeting Report should be completed soon.

Sincerely,

Amy M. Snyder, Acting Section Chief  
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