

From: Mark Travers
Sent: Monday, June 26, 2006 2:57 PM
To: Jamnes L. Cameron (jlrc@nrc.gov)
Cc: George (Mike) McCann (gmm@nrc.gov); 'bab1@nrc.gov'; 'pjl2@nrc.gov'; Jay Steinberg (Custodialtrust@lepetomaneintrustee.com); David Heidlauf; Chris Greco
Subject: Breckenridge - Meeting Follow-Up

Mr. Cameron,

On behalf of the Custodial Trust, ENVIRON would like to thank you for the opportunity to meet with you and your staff on Thursday, June 22, 2006 to discuss status and outstanding issues at the Breckenridge Disposal Site (the "Site").

This email serves as ENVIRON's summary of take-away action items that ENVIRON will be addressing in the coming weeks. ENVIRON is committed to prepare a response to comment letter to address the comments provided in the NRC letter from Dr. Lee's dated May 12, 2006. The response letter will focus on the following topics:

1. Equilibrium - The one filter cake composite sample (BR-COMP3) that yielded results which are questionable and not consistent with ENVIRON's assertion that Ra-226 is less than 50% equilibrium with U-238 will be resampled. The sample, BR-COMP3, originally collected on November 28, 2001, will be recreated to the extent practicable. If the results of this sample is consistent with the rest of the Site equilibrium data, ENVIRON will use a 50% equilibrium level in the revised dose assessment. Should the results confirm the original result for BR-COMP3, additional characterization may be necessary.
2. Partition Coefficients - ENVIRON will provide documentation of soil type at the Site and justify the use of the Sheppard and Thibault Kds cited in NUREG 6697. ENVIRON will also review the reference to determine if there is a range of pH values outside of which the reference Kds would not be valid. If such range exists, ENVIRON will confirm that the pH of the soil at the Site is within this range.
3. DCLGs - ENVIRON will provide information that confirms that subsurface soils at the DCGLs brought to the surface in a reasonable scenario (i.e, excavation for a basement) would result in a dose less than 25 mrem/year.
4. Intake Values - ENVIRON will provide justification for the use of the EPA Exposure Factors Handbook including any NRC sites that have utilized this reference in the dose assessment.

ENVIRON will also submit a petition to the NRC for an exemption pursuant to 10 CFR Section 40.14. This exemption would potentially allow soils to be disposed of at a solid waste facility in Belleville, MI that has recently been granted a permit modification allowing it to accept such exempt material.

ENVIRON and the Trust are committed to providing a letter that responds to the above issues and reports on the above tasks within the next two to four weeks. Concurrently we will submit a letter that will confirm our intent to proceed expeditiously in collection of additional and analysis samples to resolve the data from BR-COMP3. Sampling and analysis of the area where BR-COMP3 was collected is expected to require 6 to 8 weeks. The Supplemental Site Characterization Work Plan would be revised, if appropriate, following the collection and analysis of a sample(s) from to resolve the question with BR-COMP3.

Please contact David Heidlauf or me if you have any questions or comments.

Regards,
Mark

Mark A. Travers | Principal

ENVIRON International Corporation | 123 North Wacker Drive, Suite 250 |
Chicago, Illinois USA 60175

+1.312.853.9430 (Office) | +1.312.853.9025 (Facsimile) |
+1.312.375.8080 (Cellular) | mtravers@environcorp.com |
www.environcorp.com

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Subject: FW: Breckenridge - Meeting Follow-Up
Creation Date 10/25/2006 11:19:15 AM
From: "David Heidlauf" <dheidlauf@environcorp.com>

Created By: dheidlauf@environcorp.com

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GMM (George McCann)

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ch_po.CH_DO

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Files	Size	Date & Time
MESSAGE	4704	10/25/2006 11:19:15 AM
TEXT.htm	16288	
Mime.822	24039	

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