



U.S. Department of Energy

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U.S. Nuclear Regulatory Commission
Mail Stop T8F5
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Subject: Notification of De Minimus Polypropylene Placed in the Crescent Junction Disposal Cell

The purpose of this letter is to inform you that the Moab Uranium Mill Tailing Remedial Action (UMTRA) Project is now using plastic liners in many of its containers being shipped to the disposal cell at Crescent Junction, Utah. The plastic liner is dumped into the cell along with the tailings.

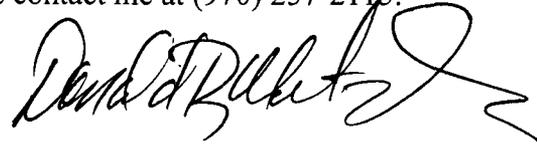
The Moab UMTRA Project is working to the Remedial Action Plan dated July 2008, for which we received a letter of conditional concurrence that same month. The conditional concurrence was related to not having a final ground water compliance action plan in place.

The project has been experiencing some difficulty with tailing materials being retained by the containers at dumping. Several methods to minimize the held material have been tried including shaking the containers more aggressively at dumping, spraying the containers with a surfactant prior to filling, painting the inside surface of the containers with a Teflon-like coating to reduce the resistance to emptying, and lining the containers with plastic sheeting, which is dumped with the material into the disposal cell. We are currently using all four methods as we determine operational parameters for our varying conditions both tailings and seasons.

The Remedial Action Plan states in the specifications "in the waste cell, non-soil materials will be placed in the contaminated tailings fill in a manner that will not result in voids in the waste mass" (Addendum B -31-00-20-page 5, RAP).

The characteristics of the liners being used include 2.5 micrometers thickness made of high density polypropylene (HPDE). Sheets placed in individual containers are approximately 1,000 square feet and weigh less than 12 pounds compared to the more than 60,000 pounds of tailings per container. Consequently, the weight of the tailings and compaction equipment being utilized easily prevent any voids associated with adding some plastic.

Therefore, our conclusion is that the HPDE liners do not prevent us from adequately compacting the materials placed of in the disposal cell. If you have any questions or require additional information, please contact me at (970) 257-2115.



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