

May 17, 2011

Mr. Richard Bush
UMTRCA Program Manager
U.S. Department of Energy
2597 B 3/4 Road
Grand Junction, CO 81503

SUBJECT: COMMENTS ON, DEPARTMENT OF ENERGY POSITION PAPER ENTITLED
“TEMPORARY SHUTDOWN OF THE GROUNDWATER REMEDIATION
SYSTEM” FOR THE TUBA CITY, ARIZONA DISPOSAL SITE

Dear Mr. Bush:

I am writing to provide U.S. Nuclear Regulatory Commission (NRC) staff comments on the November 12, 2010, Position Paper entitled “Temporary shutdown of the groundwater remediation system” for the Tuba City, Arizona disposal site. The NRC staff comments are summarized below.

1. It is not clear from the report how long the U.S. Department of Energy (DOE) intends to suspend remediation activities. It appears that DOE intends to suspend activities for up to five years. It would be helpful if a more definitive suspension period were defined and a list of planned activities during remediation suspension was included.
2. DOE appears to have based their conclusion that limited migration of contaminants of concern will occur on a numeric model, without having the specifics of the model reported to DOE at the time of the report. In addition, the title for Figure 6 “Model-Predicted Particle Travel Distances at Five Years...” is misleading. The figure appears to depict iso-concentrations at five years. However, comparison to Figure 2 existing ISO- concentration map is difficult as Figure 6 does not include topography, while figure 2 does.
3. While we agree that the suspension of drawdown of groundwater may allow the water table to re-saturate areas that have become unsaturated, it is not clear if DOE’s model takes into account that re-saturation of groundwater may increase concentrations of contaminants of concern

Based on the above we suggest that DOE increase the monitoring frequency during the suspension of remediation activities.

R. Bush

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If you have any questions concerning the NRC staff comments, please contact me at 301-415-6749 or by email at Dominick.Orlando@nrc.gov

Sincerely,

/RA/

Dominick A. Orlando, Senior Project Manager
Special Projects Branch
Decommissioning and Uranium Recovery
Licensing Directorate
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

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