



Department of Energy

Washington, DC 20585

November 18, 2014

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Deputy Director
Mail Stop T8F5
Washington, DC 20555-0001

Subject: Request for Concurrence with Revisions to the Annual Site Inspection Process at the Durango, Colorado, Disposal Site

To Whom It May Concern:

The U.S. Department of Energy, Office of Legacy Management (DOE-LM) is proposing a reduction in the number of perimeter signs visually inspected during the annual site inspection at the Durango, Colorado, Site. The report *Long-Term Surveillance Plan for the Durango Disposal Site, Durango, Colorado, January 2011* (LTSP) provides guidance for site inspectors and has been accepted by the U.S. Nuclear Regulatory Commission (NRC).

The LTSP requires inspection of each of the 82 perimeter signs marking most of the boundary of the site (the Durango disposal site does not have a perimeter fence). To date, the perimeter signs have been inspected during each Annual Inspection, with very few sign-related deficiencies as noted in the annual inspection reports. However, during the past several years the native vegetation (Oak Brush) has grown considerably along the western end of the north property line. This area of the property boundary is also along a steep hillside. The dense vegetation and the steep hillside combined have made inspecting several of the signs difficult and a concern for the safety of the site inspectors.

To ensure the health and safety of inspectors during annual inspections, DOE-LM will discontinue visual inspection of perimeter signs 40, 41, 42 and 43, located along the north boundary of the site, beginning with the 2015 annual inspection. DOE-LM has discussed this change to the requirements of the LTSP with the Colorado Department of Public Health and Environment (CDPHE). The CDPHE representatives who participate in the annual site inspection fully agree with DOE-LM that visual inspection of these four perimeter signs should be discontinued; that the steep hillside and dense vegetation are more of a deterrent to trespass onto the site in this area than the signs.

DOE-LM will continue to comply with all other requirements of the LTSP during the annual site inspection. Additionally, should the environmental conditions at the site change (i.e. drought or fire) such that the amount of vegetation in the area is reduced, DOE-LM will resume visual inspection of the signs. DOE-LM requests your concurrence to change the LTSP inspection requirements for the Durango disposal site.

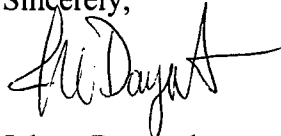
NIMSS01



Please contact me at (970) 248-6016 or Jalena.Dayvault@lm.doe.gov. Please send any correspondence to:

U.S. Department of Energy
Office of Legacy Management
2597 Legacy Way
Grand Junction, CO 81503

Sincerely,

A handwritten signature in black ink, appearing to read "Jalena Dayvault". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jalena Dayvault
Site Manager

cc:

D. Orlando, NRC
M. Cosby, CDPHE
W. Naugle, CDPHE
D. Miller, Stoller (e)
File: DUD 0535.10 (rc grand junction)