SAFETY EVALUATION REPORT
NUCLEAR FUEL SERVICES, INC. NORTH SITE
FINAL STATUS SURVEY REPORT
SUBSURFACE SOIL CHARACTERIZATION AND FINAL STATUS SURVEY PROJECT
SURVEY UNITS 13, 14, AND 15

1. Introduction

By letter dated September 30, 2013, Nuclear Fuel Services, Inc, (NFS) submitted the Final Status Survey (FSS) Report for Survey Units 13, 14, and 15 of the subsurface soil characterization and FSS Project of the NFS North Site Area. NFS requested confirmation that these survey units are suitable for unrestricted release in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20, Subpart E.

2. Background

The NFS North Site Decommissioning Plan (DP) was approved in Amendment 27 to Materials License SNM-124, dated June 19, 2001, and supplemented by information provided to satisfy Safety Condition S-47. One product of the DP was a FSS, to be performed after an area has been fully characterized and remediation has been completed.

The FSS design is an iterative process that requires appropriate site classification based on the potential radionuclide concentration levels relative to the derived concentration guideline levels (DCGLs), and incorporates a process to ensure the quality of the data obtained. In Amendment 69 to Materials License SNM-124, dated February 15, 2006, the U.S. Nuclear Regulatory Commission (NRC) approved a revised method to derive subsurface (greater than 15 cm below the ground surface) soil DCGLs and a method to perform subsurface FSSs. These DCGLs were derived to demonstrate compliance with the 25 mrem/year dose criterion for unrestricted release of the area in accordance with 10 CFR Part 20, Subpart E.

In the approval of Amendment 69, the NRC staff (staff) concluded that the subsurface FSS Plan, as described in the revised Appendix B to Chapter 5 of the DP (dated December 14, 2005) was adequate to perform FSS for subsurface soils in the North Site area for demonstrating compliance with the radiological criteria for license termination.

The staff had the following correspondence with the licensee to clearly understand and document the FSS:

- FSS Report for Survey Units 13, 14, and 15, under letter from NFS dated September 30, 2015 (Agencywide Documents Access and Management System (ADAMS) package ML13282A461).
- Acceptance for review, NRC letter dated November 26, 2013 (ML13330A094).
- Supplemental information, under NFS letter dated January 28, 2014 (ML14036A097).
- Request for additional information (RAI), letter from NRC dated June 3, 2014 (ML14148A147).
- Response to RAI, letter from NFS dated June 25, 2014 (ML14188C089).
- Revised FSS Report, letter from NFS dated January 14, 2015 (ML15079A031)

3. Scope of the Staff Evaluation

This staff evaluation addresses only the subsurface soils FSSs. If evaluation of contamination of other media is needed prior to partial site release, that must be done separately.

4. Subsurface Final Status Survey Results

4.1. Survey Unit Demarcation

4.1.1. Evaluation

The DP discusses survey unit demarcation in Section 2.7 of Chapter 5, Appendix B. NFS states that survey units are laterally demarcated using the same concepts and criteria described in the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM, NUREG-1575, Rev. 1, 2000). Section 4.6 of the MARSSIM discusses identifying survey units. MARSSIM indicates that a goal is to distribute survey data points relatively uniformly among areas of similar contamination potential. MARSSIM recommends that sites be divided into survey units that share a common history or other characteristics, or are naturally distinguishable from other portions of the site. MARSSIM also suggests a maximum area for a Class 1 land survey unit of 2000 m^2.

The staff reviewed the licensee's demarcation of the survey units. Section 2.3 of the FSS Report describes the process NFS used to demarcate survey units; here, the licensee indicates that historical knowledge and the historical sampling data were considered in the demarcation. Sections 2.6 through 2.8 of the FSS Report describe the survey units, which description is summarized as follows:

- Survey Units 13, 14, and 15 are contiguous survey units, all of which are in the former ponds area of the North Site at NFS, on the western side of the ponds area.
- All three survey units were remediated in 2007 and 2008.
- Survey Unit 13 is 650 m^2 in area.
- Survey Unit 14 is 737 m^2 in area.
- Survey Unit 15 is 99 m^2 in area. Survey Unit 15 is surrounded on three sides by Survey Unit 14.

The staff considers that all three survey units generally have similar characteristics. The size of the survey units is within the recommendations of the MARSSIM. Survey Unit 15 encompasses an area with somewhat higher concentrations based on the historical. The staff considers this an appropriate reason to separate Survey Unit 15 from the (mostly) surrounding Survey Unit 14.

4.1.2. Findings

The staff finds that the licensee adequately demarcated Survey Units 13, 14, and 15.

4.2. Size of Survey Units

4.2.1. Evaluation

Based on considerations in the review of the FSSs for Survey Units 1, 3, and 10 (NRC letter dated June 15, 2010, ML101600349), the staff concluded that the limitation of survey unit size is not necessary for the subsurface methodology. In addition, the survey units are all of area less than the maximum size recommended in the MARSSIM.

4.2.2. Findings

The Staff finds that the survey unit sizes are adequate.

4.3. Determination of Number of Coreholes for Survey Unit

4.3.1. Evaluation

An important issue for the survey design for the subsurface FSS is the number of coreholes (boreholes) for each survey unit. The FSS Plan in the DP (Section 3.2 of Appendix B to Chapter 5) specifies that sum-of-fraction (SOF) values (which are sums of ratios of concentration to DCGL for all radionuclides) would be used in determining the number of coreholes based on the statistical test of the $DCGL_W$. For startup system (SUs) 13, 14, and 15, NFS used the SOF values to determine the corehole density based on the statistical test of the $DCGL_w$.

The FSS Plan in the DP (Section 3.3 of Appendix B to Chapter 5) specifies the process for adjusting, or considering adjustment of the corehole density to account for potential elevated volumes. The process involves evaluating existing data and determining reasonable maximum and expected maximum concentrations (90th percentile and maximum). As described in the FSS Plan in the DP (Section 3.3 of Appendix B to Chapter 5), if the 90th percentile concentration exceeds the $DCGL_W$, or if the maximum concentration exceeds 4 times the $DCGL_W$, then it is necessary to adjust the corehole density. To make the adjustment, the reasonable and expected maximum concentrations are used to determine critical volumes, using “volume factor curves” derived from the dose assessment methods and limiting doses. The smallest critical volume is then used as a basis for (potentially) adjusted corehole density.

For Survey Unit 14, the reasonable maximum concentrations and expected maximum concentrations did not exceed the DCGLs or four times the DCGLs, respectively, so no adjustment to corehole density was necessary. The NRC staff had a concern that the corehole density of Survey Unit 15 may not have been considered in planning the FSS for Survey Unit 14, which surrounds Survey Unit 15 on three sides. This concern was expressed in the request for additional information (RAI) dated June 3, 2014. The staff has reevaluated this concern. Section 2.7.1 of the original FSS Report states that Survey Unit 14 has a square-shaped void in the survey unit, which (i.e., the void) is Survey Unit 15. The report further states that the elevated data points were put into a separate survey unit, with the elevated readings confined to that separate survey unit, Survey Unit 15. Based on this consideration, the staff considers that the higher density of corehole sampling for Survey Unit 15 is not necessarily appropriate to Survey Unit 14. Thus, the staff concludes that the determined corehole density for Survey Unit 14 is acceptable.

However, for Survey Units 13 and 15, it appeared initially to the staff that the corehole density may not have been properly adjusted for the reasonable maximum concentration. For Survey Unit 13, the original FSS Report (September 30, 2013 submittal), in Section 2.6 (page 2-15), indicates that the "reasonable maximum concentration" calculation results in a maximum corehole density of 3.0 m^2 (meaning a maximum of 3.0 m^2 area per corehole). This would have resulted in 216 coreholes in Survey Unit 13. However, this was not done. The FSS Report described that instead a sampling density of 50 m^2 was used, which results in a total of 14 coreholes, which appeared to be a much smaller number than called for by the DP process. A reference to the Characterization Plan, Section 4.3, was given. However, neither Section 4.3 of the Characterization Plan nor Section 2.6 of the FSS Report provided a technical basis for the proposed sampling density. Neither section demonstrated how the proposed sampling density is consistent with the process in the DP, which is the approved methodology.

Similarly, for Survey Unit 15, the original FSS Report (September 30, 2013, submittal), in Section 2.8 (page 2-33), indicates that the "reasonable maximum concentration" calculation results in a maximum corehole density of 1.0 m^2 (meaning a maximum of 1.0 m^2 area per corehole). This would have resulted in 99 coreholes in Survey Unit 15. However, this was not done. The FSS Report described that instead a sampling density of 10 m^2 was used, which results in a total of 10 coreholes, which appeared to be much smaller than the number called for by the DP process. A reference to the Characterization Plan, Section 4.3, was given. However, neither Section 4.3 of the Characterization Plan nor Section 2.8 of the FSS Report provided a technical basis for the proposed sampling density. Neither section demonstrated how the proposed sampling density is consistent with the process in the DP, which is the approved methodology.

The staff described this concern in the November 26, 2013, acceptance review letter. In response NFS provided supplemental information in a letter dated January 28, 2014. In the supplemental information, NFS stated that the final survey design of Survey Units 13 and 15 was based on professional judgment relying on consideration of three mathematical points: (i) the corehole frequency determined using historical data; (ii) the corehole frequency of the neighboring survey units sharing similar historical properties; and (iii) areal frequency as suggested by the MARSSIM. NFS also acknowledged that the historical dataset for Survey Units 13 and 15 were incorrect in the original FSS Report and would be replaced. The staff had a follow-up concern that was provided in an RAI dated June 3, 2014. NFS responded to the RAI in a letter dated June 25, 2014 and committed to revising the FSS Report. NFS revised the FSS Report under letter dated January 14, 2015.

<u>Survey Unit 13:</u>

For Survey Unit 13, the three mathematical points (i-iii) are addressed. First, regarding (i) the corehole frequency determined using historical data, the revised FSS Report provides a revised discussion of the historical data. In the revised FSS Report, Section 2.6.2, NFS states that the 3.0 m^2 sampling density used pre-remediation data no longer considered representative of the radiological status. Section 2.6.3 of the revised FSS Report describes that the corehole spacing was reevaluated. NFS states that the post-remedial action sample results from the 2008 remedial actions were not included in the 2006 dataset that was used in [the initial] design of the corehole frequency. In the revised FSS Report, NFS also describes the depth of excavation of Survey Unit 13. Based on the depth of excavation, it appears to the NRC staff that NFS adjusted the historical dataset to remove those samples that were taken (pre-remediation) at depths less than the 3–4 m of excavation. The revised historical dataset is provided in

Appendix A.1 of the revised FSS Report. The NRC staff reevaluated the revised historical dataset, and agrees that the historical data initially used to determine the corehole density was not representative of the post-remediation conditions.

NFS's reevaluation (in Section 2.6.3 of the revised FSS Report) concluded that the sampling density required based on evaluating the reasonable maximum and expected maximum concentrations (90th percentile and maximum) would be 999 m^2, which is greater than the planned sampling density of 50 m^2. Thus, NFS concluded that the planned corehole density did not need to be adjusted based on potential elevated volumes. The NRC staff agrees with this conclusion.

Second, regarding (ii) the corehole density of neighboring survey units, in Section 2.6.2 of the revised FSS Report, NFS stated that the corehole sampling density of neighboring survey units are 50, 49, and 50 m^2 for Survey Units 12, 14, and 17, respectively. The NRC staff agrees that the sampling density for Survey Unit 13 is consistent with that of the neighboring survey units.

Third, regarding (iii), areal frequency as suggested by the MARSSIM, NFS states (in Section 2.6.2 of the revised FSS Report) that because known elevated concentrations existed in the survey unit in the past, the reference system spacing identified in MARSSIM (100 m^2) was reduced by a factor of 2, resulting in a reference system spacing of 50 m^2. The NRC staff reviewed a previous FSS Report from NFS for Survey Units 2, 8, 9, 19, and 20, in which a similar statement was made. In that case, NFS specifically referenced Section 5.3.3.2 of the MARSSIM, so NRC staff believes that this present FSS Report also references the same section of MARSSIM. In Section 5.3.3.2 of the MARSSIM, the following pertinent paragraph is found:

> Sample locations should be documented using reference system coordinates (see Section 4.8.5), if appropriate, or fixed site features. A typical reference system spacing for open land areas is 10 meters (NRC 1992a). This spacing is somewhat arbitrary and is chosen to facilitate determining survey unit locations and evaluating areas of elevated radioactivity.

NRC staff notes that this discussion in MARSSIM makes recommendations about the reference system spacing, not about spacing of actual sampling locations.

In Section 2.6.2 of the revised FSS Report, NFS further states that the location of specific coreholes was determined using the VSP software, based on the "Locating a Hotspot" function (or module) of VSP. Thus, NRC staff concludes that NFS created the sampling design based on a goal of finding hot spots (or elevated areas) of 50 m^2 size with high probability (based on screen shots from the software, it appears NFS used approximately 91% probability). The staff notes that the survey unit is a former pond area, and it is reasonable that potential remaining elevated areas would likely be of size 50 m^2 or larger. In addition, though NFS did not design the sampling based on comparison of the median concentration for the survey unit (i.e., based on use of the Wilcoxon Rank Sum test) it appears to the staff that the design would be appropriate for that purpose as well. The staff concludes that the choice to set corehole density at an area of 50 m^2 is reasonable and acceptable.

Survey Unit 15:

For Survey Unit 15, the three mathematical points (i-iii) are addressed by NFS in the same manner as for Survey Unit 13. First, regarding (i) the corehole frequency determined using historical data, the revised FSS Report, Sections 2.8.2 and 2.8.3, provides a revised discussion of the historical data and reevaluation of corehole spacing. The revised historical dataset is provided in Appendix A.3 of the revised FSS Report. The NRC staff agrees with NFS that the historical data initially used to determine the corehole density was not representative of the post-remediation conditions.

NFS's reevaluation (in Section 2.8.3 of the revised FSS Report) concluded that the sampling density required based on evaluating the reasonable maximum and expected maximum concentrations (90th percentile and maximum) would be 999 m^2, which is greater than the planned sampling density of 10 m^2. Thus, NFS concluded that the planned corehole density did not need to be adjusted based on potential elevated volumes. The NRC staff agrees with this conclusion.

Second, regarding (ii) the corehole density of neighboring survey units, in Section 2.8.2 of the revised FSS Report, NFS stated that the corehole sampling density of neighboring survey unit is 49 m^2 for Survey Unit 14 (which mostly surrounds Survey Unit 15). The NRC staff agrees that the sampling density for Survey Unit 15 is more dense than that of the neighboring survey units.

Third, regarding (iii), areal frequency as suggested by the MARSSIM, NFS states (in Section 2.8.2 of the revised FSS Report) that because known elevated concentrations existed in the survey unit in the past, the reference system spacing identified in MARSSIM (100 m^2) was reduced by a factor of 10, resulting in a reference system spacing of 10 m^2. The NRC staff notes, as for Survey Unit 13, that the discussion in MARSSIM makes recommendations about the reference system spacing, not about spacing of actual sampling locations.

Similarly to Survey Unit 13, in Section 2.8.2 of the revised FSS Report, NFS further states that the location of specific coreholes for Survey Unit 15 was determined using the VSP software, based on the "Locating a Hotspot" function (or module) of VSP. For Survey Unit 15, NFS used a hot spot size of 10 m^2. Although NFS did not give specific reasons for the hot spot area being smaller that for Survey Unit 13, Survey Unit 15 was indicated to be an area that previously contained elevated concentrations, which was the reason for separating Survey Unit 15 from the surrounding Survey Unit 14. Thus, to NRC staff, choosing a smaller potential hot spot area is appropriate. In addition, though NFS did not design the sampling based on comparison of the median concentration for the survey unit (i.e., based on use of the Wilcoxon Rank Sum test) staff considers that the design would be appropriate for that purpose as well. The staff concludes that the choice to set corehole density at an area of 10 m^2 is reasonable and acceptable.

Survey Unit 14:

In the June 3, 2014, RAI, NRC expressed concern about whether the sampling design properly considered the corehole density of neighboring survey units. Survey Unit 15 is one of the neighboring survey units, and it had a sampling density of 10 m^2 per corehole. In the initial FSS Report, NFS had not specifically addressed why the higher density of corehole sampling for Survey Unit 15 is not also applicable to Survey Unit 14. In its June 25, 2014, response to the RAIs, NFS addressed this issue regarding neighboring survey units. NFS stated that the

number of coreholes for Survey Unit 14 was determined following the method approved in the DP. To the NRC staff, the response did not address the staff concern from the RAIs. However, the staff has reevaluated this concern in light of the revised FSS Report. The Staff considers that, in essence, Survey Unit 15 was carved out of Survey Unit 14, because NFS had data indicating a higher potential for elevated concentrations in the specific portion of the area that is in Survey Unit 15. Thus, it is not appropriate to apply the corehole density from Survey Unit 15 to Survey Unit 14. NFS did consider the sampling density of the other neighboring survey units around Survey Unit 14. Thus, the NRC staff concludes that NFS consideration of sampling density for neighboring survey units is appropriate and acceptable.

Post-FSS verification of corehole sampling density

NFS has also committed to performing a post-FSS verification of the necessary corehole density, based on the FSS data. These post-FSS verifications are described in Section 5.9 of the revised FSS Report and show that, based on the FSS data obtained, the corehole density for Survey Units 13, 14, and 15 was sufficient. The staff agrees with NFS' conclusion regarding the post-FSS verification of corehole sampling density.

Revision of the FSS Report

As indicated in the NRC Staff's RAIs of June 3, 2014, NFS had not revised the FSS Report based on the supplemental information provided in January 2014, some of which was a significant change to information in the original FSS Report. As indicated above, NFS has now revised the FSS Report (January 14, 2015, submittal). The staff has verified that the appropriate changes to the FSS Report have been made. The staff concludes that the revisions are acceptable to document the changes previously described by NFS.

4.3.2. Findings

The Staff finds that the determination of the number of coreholes is adequate for Survey Units 13, 14, and 15.

4.4. Surrogate Ratios from Characterization and from FSS Results

4.4.1. Evaluation

The FSS Plan for the North Site subsurface includes use of surrogate radionuclides to estimate concentrations of hard-to-detect radionuclides. For the North Site, the hard-to-detect radionuclides are Tc-99, Pu-238, Pu-239/240, Pu-241, Pu-242, Th-230, U-233/234, and U-238. Am-241, U-235, and Th-232 are the surrogate radionuclides, with Am-241 the surrogate for the plutonium isotopes; U-235 the surrogate for U-233/234, U-238, and Tc-99; and Th-232 the surrogate for Th-230. In 10 percent of the systematic FSS samples, the surrogates and the hard-to-detect radionuclides are measured, and ratios of the surrogate to each hard-to-detect radionuclide are determined. The ratios are used to estimate the concentrations of the hard-to-detect radionuclides for the other 90 percent of the samples for which only the surrogate concentrations are measured directly. The hard-to-detect radionuclides are also referred to as inferred radionuclides, because they are inferred or estimated from the surrogate radionuclide concentrations. In the FSS Report, the multiple radionuclide concentrations are accounted for by determining the sum of fractions (the fractions being the concentration of a radionuclide as a fraction of its DCGL).

In a September 11, 2012, meeting with staff, NFS stated that they preferred to continue the approach to surrogates that was approved in the DP (described above). In addition, NFS committed to evaluate the contribution to dose of the mean HTD concentrations (see NRC safety evaluation report (SER) dated June 13, 2013 [ML13129A166] for discussion of the commitment). NFS stated that for future survey unit FSS Reports, NFS would include two additional tables to evaluate the cumulative to date HTD data and the HTD data for the individual survey units. NFS stated that the tables would include the calculated Sum of Net Mean Dose Contribution. Based on NFS's commitments, NFS evaluates the surrogate data in two ways: (i) surrogate ratios will be determined and used to estimate concentrations of the inferred HTDs (as in the DP); and (ii) contributions to dose will be evaluated directly from the measured concentrations of the HTDs.

For point (i), regarding estimating concentrations of the inferred HTDs, NFS provides tables of results used for these assessments in Tables 4-3, 4-4, and 4-5 in Section 4.5 of the revised FSS Report. Per the approved method, NFS used the 95 percent upper confidence level on the mean ratio as the basis for estimating the inferred HTDs. Thus, NFS has addressed the HTDs per the DP method.

For point (ii), regarding calculating contributions of HTDs to dose, NFS provided discussion of the potential dose impacts from HTDs in Section 5.8 of the revised FSS Report. For the individual Survey Units 13, 14, and 15, NFS indicates the maximum contribution to be 2.79 percent of the DCGL, or 0.70 mrem/yr (for Survey Unit 14) (from Tables 5-24, 5-25, and 5-26 of the revised FSS Report). For the cumulative impact of the entire North Site, NFS indicates the contribution of the HTDs to be 1.40 percent of the DCGL, or 0.35 mrem/yr (from Tables 5-23 of the revised FSS Report). The staff concludes that the data indicate that the dose contribution from the HTDs is insignificant.

Surrogate ratios based on historical characterization data are also used in the survey design, specifically as part of the potential adjustment of corehole density to satisfy criteria for local area DCGLs. NFS committed to compare surrogate ratios obtained from the FSS results to surrogate ratios determined based on the historical data to verify that the planning of the FSS was appropriate. NFS provides that comparison in Section 5.7 of the FSS Report. The comparison indicated that some of the surrogate ratios based on historical data were non-conservative when compared to ratios developed from the FSS data. NFS performed additional evaluations to verify that the FSS designs were appropriate (i.e., not impacted by the non-conservative ratios). The staff concludes that these additional evaluations are appropriate and, therefore, the use of surrogate ratios for the design of the FSSs is acceptable.

4.4.2. Findings

The staff finds that overall, the use of surrogates and determinations of HTD concentrations and results of the surrogate evaluations are acceptable for Survey Units 13, 14, and 15.

4.5. FSS Results and Demonstration of Compliance with DCGLs

4.5.1. Evaluation

NFS provides an analysis of the sample results for compliance with the subsurface DCGLs in Chapter 5 of the FSS Report. NFS calculated the SOF values for each sample in the survey

units and provides a histogram summary of the SOF values in Section 5.1 of the FSS Report. If all individual samples from a survey unit have an SOF (relative to the surface DCGL) no greater than one, then the survey unit passes without further statistical analyses. In Section 5.1, NFS stated that for Survey Units 13, 14, and 15 each sample SOF value is less than or equal to one. Thus, all survey units pass (i.e., the null hypothesis that residual radioactivity in the survey unit exceeds the $DCGL_w$ is rejected) and no further compliance tests are necessary in this case. The Staff reviewed the analyses of individual sample SOFs, and agrees with the conclusion that the SOF values are no greater than 1 for Survey Units 13, 14, and 15.

4.5.2. Findings

The staff finds that the results of the subsurface survey demonstrate that the subsurface residual radioactivity in Survey Units 13, 14, and 15 are within the criteria.

4.6. Possible Surface Soils in Survey Unit 14 Needing a Surface Survey

4.6.1 Evaluation

Based on the original FSS Report, it appeared to the NRC staff that Survey Unit 14 may contain surface soils, for which a surface FSS would need to be completed. The staff asked for additional information in its June 3, 2014, RAIs. NFS provided a response in its June 25, 2014 submittal. NFS provided additional detail about the elevations of original site soils for coreholes in the area of coreholes 360, 363, and 366, which are the coreholes about which Staff expressed concern. This information indicates that original site soils (i.e., soils that were not excavated) are several feet below the planned final grade of this area. NFS also provided the soil boring logs for these three coreholes, which showed that there was fill material present at the top of each corehole down to depths of 8–10.5 ft. This additional information shows that the subject area of Survey Unit 14 does not contain soils that will be surface soils when the final site grading is completed.

4.6.2 Findings

The staff finds that surface soils are not present in Survey Unit 14 and no surface FSS is needed for this survey unit.

4.7. Potential for Re-contamination and Disturbance

4.7.1 Evaluation

NFS is not requesting a partial site release of Survey Units 13, 14, and 15 at this time; instead, the licensee is requesting “confirmation that these survey units will be suitable for unrestricted release in accordance with 10 CFR, Part 20, Subpart E” (Ref. 1). Decommissioning and sampling activities continue in other parts of the North Site area, giving rise to a potential for Survey Units 13, 14, and 15 to be re-contaminated. In the DP, the licensee discusses how re-contamination of decommissioned areas is prevented. When partial site release is requested, the potential for re-contamination or other disturbance of the survey unit areas must be considered and addressed.

6. Conclusion

Based on the above evaluations and findings, for the subsurface soils, the staff finds that the FSSs for Survey Units 13, 14, and 15 were performed in a manner that is consistent with the subsurface FSS Plan in the DP. The staff also finds that FSS results indicate that residual radioactivity remaining in the subsurface soils is within acceptable criteria.

7. Recommendations

The staff approves confirming that the subsurface soils of Survey Units 13, 14, and 15 are currently suitable for unrestricted release, subject to the caveats described in Section 4.7.

PRINCIPAL CONTRIBUTOR:

Duane Schmidt, NMSS/DUWP/RDB