

October 8, 2015

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

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF REVIEW OF THE DATA VALIDATION PACKAGE ENTITLED "DECEMBER 2014 GROUNDWATER AND SURFACE WATER SAMPLING AT THE MONUMENT VALLEY, ARIZONA, PROCESSING SITE" DATED FEBRUARY 2015 (Docket No. WM-00070)

Dear Angelito Denny:

I am writing in response to the U.S. Department of Energy (DOE) Data Validation Package (DVP) entitled "December 2014 Groundwater and Surface Water Sampling at the Monument Valley, Arizona, Processing Site" dated February 2015 [Agencywide Document Access and Management System (ADAMS) Accession Number ML15231A009]. The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the DVP and has the following comments:

1. In the "Sample Event Summary," the results for well 606 show that the well was in compliance with the sulfate/chloride ratio treatment goal of 9 milligrams per milliliter (mg/ml) in the 2013 report, while in the 2014 report the sulfate/chloride ratio is 13 mg/ml; and, as such, no longer meets the treatment goal. DOE may want to evaluate the sulfate/chloride ratio at other wells that also have met, and then failed to meet, the treatment goal to determine if there are any trends associated with the results.
2. In the "Potential Outliers Report," the text indicates that 3 outliers were observed (chloride at locations 655 and 744 and uranium at 772) while the table identifies 7 outliers (those previously noted and turbidity at locations 605 and 623 and specific conductance at locations 764 and 772). Suggest the report be reviewed to determine if this is significant.
3. In the "Time Concentration Graphs" there are changes in the scales of the x or y axis of the graphs for ammonia, chloride, nitrate, uranium, vanadium without an explanation for the change. This makes year to year comparisons of the results difficult.
4. It appears that, when a well is dry during an annual sampling event, the results for that well are not included in the graph, although the prior year's sampling results were included in the time concentration graphs in prior year's reports. In order to provide a more complete representation of the ground water conditions at the site, we suggest that the time concentration graphs for all wells be included in the report, even when the well in the current report was dry during the sampling event.

A. Denny

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

Sincerely,

/RA/

Dominick Orlando, Senior Project Manager
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket No.: WM-00070

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Monument Valley Distribution List

A. Denny

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