

October 8, 2015

Mr. Richard Bush, Program Manager  
U.S. Department of Energy  
Office of Legacy Management  
2597 Legacy Way  
Grand Junction, CO 81503

SUBJECT: U.S. DEPARTMENT OF ENERGY DATA VALIDATION PACKAGE ENTITLED  
"FEBRUARY 2015 GROUNDWATER AND SURFACE WATER SAMPLING AT  
THE TUBA CITY, ARIZONA, DISPOSAL SITE," DATED JUNE 2015 (Docket  
Number WM-00073)

Dear Mr. Bush:

I am writing in response to the U.S. Department of Energy's (DOE's) Data Validation Package (DVP) entitled "February 2015 Groundwater and Surface Water Sampling at the Tuba City, Arizona, Disposal Site" dated June 2015 [Agencywide Document Access and Management System (ADAMS) Accession Number ML15254A412]. The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the DVP and has the following comments:

1. In the "Laboratory Performance Assessment" it is not clear how the anion/cation balance is determined. Seven locations had charge balances greater than 10 percent, but the report only states that no analytical errors were identified. It is not clear what actions are necessary when the charge balance of greater than 10 percent is identified.
2. In the "Sampling Quality Control Assessment," it states "These 27 wells were purged and sampled using the low-flow sampling method and Category II criteria: 0251, 0258, 0262, 0263, 0264, 0265, 0266, 0267, 0272, 0273, 0274, 0281, 0282, 0286, 0287, 0288, 0289, 0290, 0906, 0908, 0929, 0934, 0940, 0941, NMW-6S, NMW-7D, and NMW-9D. The sample results for these wells were qualified with a "Q" flag, indicating the data are qualitative because of the sampling technique." It is not clear how the data are "qualitative" and what this means with respect to the report.
3. In the same section, the trip and equipment blanks were not analyzed, and an explanation was not provided. Suggest that this be reviewed to determine if it is significant.
4. In the "Time Concentration Graphs" section, the Horizon A graph for nitrate, sulfate and uranium at locations 686, 687, 688, 901, 945, and 946 appear to be missing from the report and a new well 929 added. Suggest that the report be reviewed to determine why the graphs were not included.

R. Bush

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In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning the NRC staff comments, please contact me at 301-415-6749 or by e-mail at [Dominick.Orlando@nrc.gov](mailto:Dominick.Orlando@nrc.gov).

Sincerely,

*/RA/*

Dominick A. 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-00073

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Materials Decommissioning Branch  
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