



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 27, 2017

Mr. Richard Bush, Program 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  
FEBRUARY 2016 GROUNDWATER AND SURFACE WATER SAMPLING AT  
THE TUBA CITY, ARIZONA, DISPOSAL SITE (Docket Number WM-00073)

Dear Mr. Bush:

I am writing in response to the U.S. Department of Energy (DOE) report entitled "February 2016 Groundwater and Surface Water Sampling at the Tuba City, Arizona, Disposal Site", dated April 2016 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML16207A062). The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the report and has the following comments:

1. During the 2/2016 inspection of the site by the NRC, the inspector noted that DOE's current groundwater sampling plan, also called the Constituent Sampling Breakdown, included a list of 18 analytes for analysis. This list differed from the list provided in the 1999 Groundwater Corrective Action Plan (GCAP), but was similar to the list provided in the 1996 Long-Term Surveillance Plan. Specifically, the current sampling plan included arsenic, silica, and vanadium, three chemicals not listed in the GCAP. The list dropped cadmium, chromium, tin, and zinc which were listed in the GCAP. During the onsite visit, DOE representatives could not explain the discrepancy between current sampling requirements and the requirements provided in the GCAP. Has the DOE determined the reason for this discrepancy?
2. The Water Sampling Field Activity Verification Checklist indicates that only 3 of 37 extraction wells were sampled and the only rationale provided was that site hydrologist stated that only 3 wells need to be sampled. In addition the Work Order for the sampling indicates that 37 extraction wells were to be sampled. Please provide more information on the rationale for this determination by the site hydrologist.
3. Time concentration graphs for well numbers 1003, 1004, 1006, 1007 and 1101 appear to be missing from the report.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 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 Website at <http://www.nrc.gov/reading-rm/adams.html>.

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If you have any questions concerning the NRC review of the report, please contact me at 301-415-6749 or by email 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

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**ADAMS Accession No.: ML17076A111**

<b>OFC</b>	DUWP	DUWP	DUWP	DUWP
<b>NAME</b>	DOrlando	CHolston	TSmith	DOrlando
<b>DATE</b>	03/27/17	03/21/17	03/23/17	03/27/17

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