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TENNESSEE VALLEY AUTHORITY
KNOXVILLE, TENNESSEE 37902



Mr. Ross A. Scarano, Section Leader
New Facilities Section
Uranium Recovery Licensing Branch
Division of Waste Management
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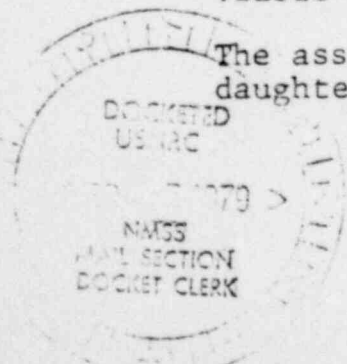
Dear Mr. Scarano:

This is in response to your request for TVA's comments on NRC's draft generic environmental impact statement on uranium milling. We appreciate the opportunity to provide comments.

In our review we have noted several areas of concern. In section 8.4.9 (page 8-20), with regard to the option of lining before backfilling the pit as in Alternative 2, it is doubtful that a clay liner could be applied to pit walls below the water table. If this were feasible, the integrity of the liner probably could not be maintained once the groundwater gradient was reestablished. With respect to section 12.7 (page 12-26), if a substantial start on facilities for tailings disposal under then-existing standards has been made, it is not appropriate to impose more stringent criteria which would require substantial modifications absent extraordinary circumstances where the health and safety of the public would be affected.

In section 10, Tables 10.1 (page 10-2) and 10.3 (page 10-9), monitoring for the short-lived radon daughters in units of WL should be acknowledged as an adequate substitute for radon gas monitoring. About 95 percent of the dose due to radon exposure is due to these short-lived daughters. Therefore, accurate measurement of these daughter concentrations is essential in estimating health effects. Since these daughter concentrations are only indirectly obtained from radon gas measurements, direct measurements of the daughter concentrations themselves should be considered a viable if not more accurate method for monitoring.

The assumption used in Appendix G-3.4 (page G-23) that daughter concentrations for ingestion pathways are identical



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Mr. Ross A. Scarano

to those of the parent isotopes for which concentrations are computed explicitly can lead to erroneous results because of the differences in the transfer factor, B_{vi} , for different isotopes.

Sincerely,

Herbert S. Sanger, Jr.
Herbert S. Sanger, Jr.
General Counsel

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