

NOV - 9 1989

Mr. Mark Matthews, Acting Project Manager
 Uranium Mill Tailings Project Office
 Albuquerque Operations Office
 U.S. Department of Energy
 P.O. Box 5400
 Albuquerque, NM 87115

Dear Mr. Matthews:

We have reviewed the draft Surveillance and Maintenance Plan (S&MP) for the Spook UMTRA Site in Converse County, Wyoming transmitted by your letter dated September 22, 1989. Enclosed are our comments resulting from the review.

I would like to highlight one general comment (Comment No. 1) which we believe is important to preparation of not only this plan but other surveillance plans as well. The surveillance plan, in addition to providing the basis for issuance of a general license, will also establish the detailed procedures to be followed at each site to help fulfill terms and conditions of that license. With this in mind, care should be taken to consider the site-specific conditions when making general references to requirements in the DOE generic document, "Guidance for UMTRA Project Surveillance and Maintenance."

If you have any questions regarding these comments, please do not hesitate to contact me or Dan Gillen of my staff (FTS 492-0517).

Sincerely,

ORIGINAL SIGNED BY

Paul H. Lohaus, Chief
 Operations Branch
 Division of Low-Level Waste Management
 and Decommissioning, NMSS

Enclosure: As stated

cc: S. Mann, DOE Hq.
 M.Scoutaris, DOE Alb.

Distribution: Central File # WM-72

RBangart, LLWM
 PLOhaus, LLOB

JGreeves, LLWM
 MFliegel, LLOB

MBell, LLRB
 DGillen, LLOB

NMSS r/f
 JSurmeier, LLTB
 JJones, LLOB r/f

PDR YES ☒

PDR NO ☐ Category: Proprietary ☐ or CF Only ☐

ACNW YES ☒

NO ☐

SUBJECT ABSTRACT: REVIEW OF SPOOK S&MP

* See Previous Concurrence

OFF	:LLOB*	:LLOB*	:LLOB*	:LLWM	:LLWM	:NMSS
NAME:	DGillen/jj	MFliegel	PLohaus	:	:	:
Date:	11/07/89	11/07/89	11/08/89	11/ /89	11/ /89	11/ /89

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Dear Mr. Matthews:

We have reviewed the draft Surveillance and Maintenance Plan (S&MP) for the Spook UMTRA Site in Converse County, Wyoming transmitted by your letter dated September 22, 1989. Enclosed are our comments resulting from the review.

As a general consideration in your preparation of this and other surveillance and maintenance plans, we wish to point out that, by condition of the general licence (NRC rulemaking in progress), each of these documents will eventually become the detailed licence requirements. With this in mind, care should be taken to consider the site-specific conditions when making wholesale references to requirements in the DOE generic document, "Guidance for UMTRA Project Surveillance and Maintenance." Further, the final S&MP should be written in terms of post-licensing conditions, not proposed or present conditions (see enclosed comment 1).

If you have any questions regarding these comments, please do not hesitate to contact me or Dan Gillen of my staff (FTS 492-0517).

Sincerely,

Paul H. Lohaus, Chief
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 Division of Low-Level Waste Management
 and Decommissioning, NMSS

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NO ☐

SUBJECT ABSTRACT: REVIEW OF SPOOK S&MP

OFC :LLOB	:LLOB	:LLOB	:LLWM	:LLWM	:NMSS
NAME:DGillen/jj	:MFliegel	:PLOhaus	:	:	:
Date:11/7/89	:11/7/89	:11/8/89	:11/ /89	:11/ /89	:11/ /89

ENCLOSURE

NRC COMMENTS ON
DRAFT SURVEILLANCE AND MAINTENANCE PLAN
FOR THE SPOOK UMTRA SITE IN
CONVERSE COUNTY, WYOMING

UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Spook, Wyoming
Document: Surveillance and Maintenance Plan
Commenter: Nuclear Regulatory Commission

Date: November 6, 1989

1. General - Once the NRC rulemaking is complete, the general license will contain a condition that requires care for the site in accordance with the provisions of the surveillance and maintenance plan (S&MP), referred to in the proposed rulemaking as the Long-Term Surveillance Plan, or LTSP. Therefore, the provisions of the S&MP will become licence conditions.

Because of this eventual incorporation of the S&MP into the license, care should be taken to consider the site specific conditions when making wholesale references to requirements in the DOE generic guidance document. References should be specific, direct, and qualified if necessary. For example, Section 3.1 of the S&MP indicates, "The inspection procedures, photography procedures, pre-inspection familiarization, and other requirements will be those described in Section 3.3 of the Guidance Document." Section 3.3 has requirements for the inspection team that conflict with statements in Section 3.1 of the S&MP (see Comment 4). When revising the draft S&MP, DOE should review all references to the generic document to insure that all referenced requirements are appropriate for and consistent with the S&MP.

Although it may be appropriate for this early draft to be written in terms of proposed or present conditions, the final form of the S&MP should be written in terms of post-licensing conditions. In particular, Section 1.2 (Site Description) should be replaced with a legal description of the site and site ownership (not "private property"), and a detailed description of the final site conditions. Reference to information in the Completion Report is acceptable. Further, use of "will be" should become "has been" or "is". For example, "Two permanent survey monuments will be [have been] established..." and "Since the Spook pile will be [is] buried beneath 49 to 65 feet of overburden material...".

SECTION 2

Response: _____

Date: _____

By: _____

Plans for Implementation:

SECTION 3

Confirmation of Implementation:

Checked by: _____

Approved by: _____

Date: _____

Date: _____

UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Spook, Wyoming
Document: Surveillance and Maintenance Plan
Commenter: Nuclear Regulatory Commission

Date: November 6, 1989

2. Figures 1.3 and 2.1, Attachment 1 - The contours and elevations shown on Figures 1.3, 2.1, and Attachment 1 should be revised to reflect the new grading plan that will result from the backfill volume modification.

SECTION 2

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Date: _____

By: _____

Plans for Implementation:

SECTION 3

Confirmation of Implementation:

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Approved by: _____

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Date: _____

UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Spook, Wyoming

Date: November 6, 1989

Document: Surveillance and Maintenance Plan

Commenter: Nuclear Regulatory Commission

3. Survey Monuments - Section 2.1.1 of the S&MP indicates that there will be two permanent survey monuments established at the Spook site. However, Section 2.6.1 of DOE's "Guidance for UMTRA Project Surveillance and Maintenance" contains a statement that a minimum of three permanent survey monuments will be established at each site. The Spook S&MP should be revised to be consistent with the guidance document, or to include justification for the reduction to only two monuments.

SECTION 2

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SECTION 3

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UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Spook, Wyoming

Date: November 6, 1989

Document: Surveillance and Maintenance Plan

Commenter: Nuclear Regulatory Commission

4. Phase I Inspection - Section 3.1 of the S&MP includes a statement that the inspection team will be comprised of an engineer and a degreed professional familiar with the surveillance and maintenance program. However, Section 3.3.1 of DOE's guidance document states that if only two inspectors are assigned, one will be a geotechnical engineer/geologist and one will be a civil engineer. The Spook S&MP should be revised to be consistent with the guidance document. Requiring only a degreed professional familiar with the program does not ensure that the technical expertise necessary to assess the long-term stability status will be provided.

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UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Spook, Wyoming

Date: November 6, 1989

Document: Surveillance and Maintenance Plan

Commenter: Nuclear Regulatory Commission

5. Contingency Plans - Section 6.2 of the S&MP includes a statement that DOE will become aware of problems through, for one, detection/compliance monitoring. Since there is no planned groundwater monitoring associated with the Spook surveillance and maintenance, this statement should be deleted. In addition, this section should be revised to require timely notification of the NRC prior to DOE actually conducting a contingency inspection.

SECTION 2

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SECTION 3

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Date: _____

Approved by: _____

Date: _____