

~~State of Colorado~~
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STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

4210 East 11th Avenue
Denver, Colorado 80220
Phone (303) 320-8333

RETURN ORIGINAL TO PDR, HQ.



Roy Komer
Governor
Thomas M. Vernon, M.D.
Executive Director

September 28, 1989



Joe E. Virgona
Project Engineer
Department of Energy
Grand Junction Project Office
P.O. Box 2567
Grand Junction, Colorado 81502-2567

Re: Draft Generic Supplemental Standards Application; GRJ X

Dear Mr. Virgona:

We have reviewed this document and offer the following comments.

1. Owner Comments. Owner comments should be solicited to verify contaminant location information, gather information concerning future use and provide an opportunity to comment on the proposed action. Comments should be included in the supplemental standards application package. In addition, the application package should respond to issues raised in the comment letters.
2. Land Use Information. Comments from the applicable land use planning agency should be solicited in order to verify the likelihood of future changes in use. These comments should be bound in the application package and issues raised in comment letters should also be addressed in the application package.
3. Risk Assessment. A fundamental basis for application of supplemental standards is the finding that leaving the tailings in place does not pose a clear present or future hazard. In the case of this generic package, it seems that most likely scenario for a future hazard would be relocation of tailings excavated during a utility repair to a location that presents a risk such as a future home site. The application package should assess the likelihood of such an incident or series of incidents over time based on real utility repair data in evaluating this hazard. The application package should also assess the likely levels of such contaminated material removed during utility repair. This assessment should consider mixing of tailings with non-radioactive soils when determining likely contaminant levels.

DESIGNATED ORIGINAL

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Certified By Mary C. Hood

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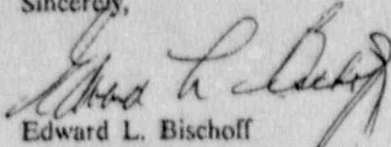
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The application package should also include a copy of the Utility worker risk assessment prepared by DOE dated September 8, 1989, in order to address risks to utility workers. This study has not been completely reviewed by the Colorado Department of Health at this time. We anticipate providing comments to DOE by October 23, 1989.

Sincerely,



Edward L. Bischoff
UMTRA Program Manager
Hazardous Materials and
Waste Management Division

ELB:lh:5237K

cc: Bud Franz/CDH
Jolene Garcia/DOE
Ed Hawkins/NRC ✓
Paul Lohaus/NRC