



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

AUG 28 1980

WMUR:JER/HJM
Project WM-39

Dr. Donald H. Groelsema
Remedial Action Program
Nuclear Waste Management Programs
Office of Nuclear Energy
U. S. Department of Energy
Washington, DC 20545

Dear Dr. Groelsema:

This letter is in response to your April 1, 1980 request for review of the tentative outline for the Uranium Mill Tailings Remedial Action Program Environmental Impact Statements developed by Sandia Laboratories.

The outline is comprehensive and appears to meet all requirements spelled out by the Council on Environmental Quality in Title 40 Code of Federal Regulations Part 1502 - Environmental Impact Statements. We have reviewed and generally agree with (subject to specific comments contained in Attachment 1) the EIS outline as submitted.

If you have any questions concerning our comments, contact Mr. J. E. Rothfleisch of my staff at FTS 427-4536.

Sincerely,

A handwritten signature in cursive script, appearing to read "H. J. Miller".

H. J. Miller, Section Leader
Uranium Recovery Licensing Branch
Division of Waste Management

Enclosure:
As stated

cc: Mr. R. H. Campbell, with enclosures

REVIEW COMMENTS ON TENTATIVE OUTLINE
FOR THE UMTRAP ENVIRONMENTAL
IMPACT STATEMENTS

- Page 1 - It is suggested that the format be rearranged so that the Summary (and conclusions) follow immediately after the cover sheet as recommended in 40 CFR 1502.10.
- Chapter 3 - It is assumed that the description of the alternatives to the proposed action will also include a discussion of the relative advantages and disadvantages of alternative disposal sites. We suggest that the following siting criteria be featured prominently in selecting the optimum tailings disposal site:
- (a) Locate the tailings disposal area remote from people so that population exposures will be reduced to the maximum extent reasonably achievable.
 - (b) Locate the tailings disposal area so that disruption and dispersion by natural forces (particularly wind erosion and flooding) is eliminated or reduced to the maximum extent reasonably achievable.
 - (c) Locate the tailings where potential for and consequences of seepage to usable groundwater of tailings contaminants are eliminated or reduced to the maximum extent reasonably achievable.
- Chapter 4 - The description of the environment at proposed and alternate sites should emphasize those aspects which are most important in assuring long term containment of mill tailings. More specifically, the topographic, geologic, hydrologic, and weather conditions which determine the potential for long term erosion and stability and seepage control should be emphasized. This should not be restricted merely to concern for potential events over a 1000 year period. Draft EPA criteria referred to in the proposed outline require demonstrating stability for a minimum of 1000 years not just for 1000 years as suggested. Protection for many thousands of years is practicable and cost-effective and a routine matter in licensing of active mills. For example, designing to protect against a conservative probable maximum flood (PMF) series is required in licensing mills (that is, 1.4 x PMF plus a 100 year flood).

- Section 4.1 - The potential affected areas should also include the areas along the transportation routes between the mill-tailings sites and the disposal sites.
- Section 4.5 - Change "Section 4.5" to read "Section 4.4" in the last two sentences.
- Section 4.10.2 - Please clarify whether this section will discuss radiation levels at off-site structures and contaminated open lands outside the processing site perimeter. The remedial action at off-site structures should be described at least in enough detail to characterize in general terms the nature and extent of associated impacts. Detailed treatment of off-site structures does not appear appropriate; attempting this would likely only serve to delay the overall remedial action program. With regard to open land contamination caused by blowing of tailings, the EIS must be complete and comprehensive.
- Section 5.2.7 - The noise level along the transportation route between the tailings pile and the disposal site could be an important consideration.