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# STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

RETURN ORIGINAL TO PDR, HQ.

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



September 22, 1989

Joseph E. Virgona  
Project Engineer  
U.S. Department of Energy  
P.O. Box 2567  
Grand Junction, Colorado 81502



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

Re: Colorado Response to Supplemental Standards Application for GJ-97002-OT - Phase II,  
GJ - 97003 OT - Phase II, GJ. - 97004 - OT - Phase II, and GJ - 97005 - OT - Phase II; GRJ-X

Dear Mr. Virgona:

We have reviewed the Application for Supplemental Standards (SS) noted above and find them to conform to the requirements of 40 CFR 192 with exception to the items noted below:

1. Control Plan. The recommendation in Section 3.0 recognizes the potential for future migration of tailings from Main Street area. It suggests development and implementation of a long-term tailings management, disposal and migration plan addressing undiscovered deposits, deposits left in place through the application of SS and deposits not within existing inclusion boundaries. We find that this plan is an integral component of the application of SS to ensure that the definition of "control" is met; i.e. that tailings are placed in a condition that will minimize the risk to man over a long period of time.
2. Risk Assessment. The risk assessment does not consider radiation exposure to a worker who is completing utility repairs in the future. This exposure would be higher than that experienced on the surface in cases where storm sewer repair trench excavation. Given the significant quantities of tailings left in utility corridors throughout Mesa County this potential risk of exposure to workers should be assessed.

An adequate response to item 1 will be necessary prior to our concurrence. Item 2 may be addressed by a Utility Worker Health Risk Analysis provided by DOE on September 13, 1989. We anticipate providing comments on this analysis by October 24, 1989. Until this analysis is found satisfactory, item 2 remains an open issue.

If you have any questions, please call me at 303-331-4813.

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

ELB:lh

cc: Bud Franz/CDH  
Jody Garcia/DOE  
Mark Achen/GJ  
Ed Hopkins/NRC

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Certified By Mary C. Ford

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