

April 11, 1990

**Certified Mail  
Return Receipt Requested**

Mr. G. Michael Vasquez  
Radiation Specialist  
Nuclear Material Inspection Section  
U.S. NUCLEAR REGULATORY COMMISSION  
Region IV  
Arlington, Texas 76011

Dear Mr. Vasquez:

As a result of a telephone conversation between you and Lee Lacey of Sequoyah Fuels Corporation (SFC) on April 10, 1990, I am writing this letter to provide technical justification for changes to the Pond 2 special monitoring program. As I understand it, Reau Graves committed to semi-monthly monitoring of Pond 2 wells beginning April 15. Subsequently, Lee Lacey contacted you to request that (1) the schedule be relaxed to monthly, (2) special monitoring analysis be restricted to nitrates, and (3) ten representative wells be selected for the special monitoring program.

What little groundwater occurs in the area of Pond 2 travels very slowly. Transport time has been estimated in a June, 1984 hydrology report at 122 feet/year. Therefore, SFC believes that a monthly monitoring schedule will serve very adequately to identify and track trends.

Currently, the only species showing up significantly in the monitoring wells surrounding Pond 2 is nitrates. Nitrates are highly soluble and very mobile in groundwater. They would be far and away the earliest precursor of any increase in groundwater contamination levels. If a significant increase in nitrate concentration should occur, further investigation will be initiated. With these issues in mind, SFC believes that special monitoring for nitrates will achieve the results NRC desires.

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There are presently thirty wells around Pond 2, which are many more wells than are needed to adequately monitor the groundwater in the area. A well upgrade and reduction program is being considered. Ten of these wells have been selected as representative of the pond area, encompassing the pond on all sides. The attached drawing of the Pond 2 area shows all monitoring wells, with the ten proposed wells indicated as stars. SFC believes these wells will be more than adequate for the special monitoring program.

Should you have any questions concerning this letter, please contact Lee Lacey at 918/489-3207.

Sincerely,

  
Scott P. Knight  
Vice President  
Administration

SPK:LRL:nv

Attachment

xc: Chuck Robinson, NMSS

★ — PROPOSED MONITOR WELLS FOR INCREASED SAMPLING

2310

★ ● ED-8

2311

ED-6

2317



2312

● ED-11

ED-6

2318



RAFFINATE  
POND #2

2305



2313

2330



2329



2319

2328



2326



2338



2321



2326



2339



M-1



M-2



M-3



M-4



T-1



2314



T-4



ED-1



T-6



North

Scale

0 100'

● Monitor Well

W-2-A1