

United States Department of Energy



# COMMENT AND RESPONSE DOCUMENT FOR THE VICINITY PROPERTY SURVEILLANCE AND MAINTENANCE PLAN BURRELL, PENNSYLVANIA

April 1993 Revised

Work Performed Under Contract No. DE-AC04-91AL62350

Jacobs Engineering Group Inc.  
Albuquerque, New Mexico



Uranium Mill Tailings Remedial Action Project

COMMENT AND RESPONSE DOCUMENT  
FOR THE VICINITY PROPERTY  
SURVEILLANCE AND MAINTENANCE PLAN,  
BURRELL, PENNSYLVANIA

APRIL 1993

Work Performed Under Contract No. DE-AC04-91AL62350

Prepared for  
U.S. Department of Energy  
UMTRA Project Office  
Albuquerque, New Mexico

Prepared by  
Jacobs Engineering Group Inc.  
Albuquerque, New Mexico

UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Burrell, Pennsylvania Date: Nov. 20, 1992

Document: S&M Plan

Reviewer: U.S. Nuclear Regulatory Commission

Comment: 1. General

To avoid confusion in future references to this document, the title should be changed to refer to it as a Long-Term Surveillance Plan, as required by 10 CFR Part 40.27.

SECTION 2

Response: Page: NA By: T. Monaghan Date: Mar 11, 1993

Comment acknowledged.

Plans for Implementation:

The document title was changed to "Burrell, Pennsylvania, Vicinity Property Long-Term Surveillance Plan," April 1993 Revised.

UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Burrell, Pennsylvania, Date: Nov. 20, 1992  
Document: S&M Plan  
Reviewer: U.S. Nuclear Regulatory Commission  
Comment: 2. 1992 LTSP Generic Guidance Document

The Burrell Surveillance and Maintenance (S&M) Plan makes multiple references to the Department of Energy (DOE) 1986 guidance document for surveillance and maintenance. Since DOE has recently completed a complete revision/update of this document (1992), DOE should revise the Burrell S&M Plan to reference this new guidance document. DOE should also review the ground-water monitoring program described in Section 4.3 of the Burrell Final Surveillance and Maintenance Plan and assure that the program is consistent with the Stabilization in Place monitoring provisions detailed in the revised Generic Guidance Document.

SECTION 2

Response: Page: 4-4 By: T. Monaghan Date: Mar 11, 1993  
D. Heydenburg

Comment acknowledged. The groundwater monitoring program described in Section 4.3 (now 4.2) of the LTSP is consistent with the provisions outlined in Section 5.4 (Monitoring at SIP and SOS Disposal Sites) of the Guidance Document.

Plans for Implementation:

All references to the 1986 guidance document were revised to reflect the latest revision, Guidance for Implementing the UMTRA Project Long-term Surveillance Program (Guidance Document), September 1992.

UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Burrell, Pennsylvania Date: Nov. 20, 1992  
Document: S&M Plan  
Reviewer: U.S. Nuclear Regulatory Commission  
Comment: 3. Phase I Inspection (Section 3.1)

In the first line of the last paragraph of this section, DOE talks about resurveying of displacement monuments (in addition to the annual inspection) to monitor the progress of displacement and lateral slope movements, but does not mention any frequency for such surveys. DOE should revise this paragraph to clearly indicate the frequency for the displacement monument surveys.

SECTION 2

Response: Page: 2-2 By: T. Monaghan Date: Mar 11, 1993  
J. Lommler

Resurveying of the displacement monuments has not occurred since 1986-87. Data from these surveys for maximum settlement measured are on file at the UMTRA Project Office. These results "...concluded that movements will be insignificant..." thus continued monitoring was not conducted.

Plans for Implementation:

The subject paragraph was deleted from Section 3.1, and Section 2.3, Displacement monuments, was further revised by stating "continued monitoring of these displacement monuments is no longer required."

UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Burrell, Pennsylvania, Date: Nov. 20, 1992

Document: S&M Plan

Reviewer: U.S. Nuclear Regulatory Commission

Comment: 4. Ground-Water Characterization (Section 4.2)

The ground-water characterization description does not provide an adequate detailed description of the existing site ground-water conditions. Section 4.2 provides a clear overall description of the hydraulic and general geologic conditions beneath the Burrell disposal cell, but does not identify the existing ground-water quality at the site. Section 40.27(b)(2) requires a detailed description of the final site conditions, including existing ground-water characterization, which can be in the form of reference (specific citations) to documents previously submitted to the Nuclear Regulatory Commission. DOE should provide adequate details of existing ground-water quality, and flow conditions, including effects of seasonal influences.

SECTION 2

Response: Page: 4-1 By: D. Heydenburg Date: Mar 11, 1993

Comment acknowledged.

Plans for Implementation:

The DOE has provided additional details on existing groundwater conditions at the Burrell site in Section 4.1 of the LTSP. In particular, results of groundwater quality sampling from the 10 monitor wells in the monitoring network have been summarized, along with results of sampling surface water from the Conemaugh River and water from the seeps at the base of the disposal cell.

Seasonal variation of groundwater levels has also been included in Section 4.1 of the LTSP.

UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Burrell, Pennsylvania, Date: Nov. 20, 1992  
Document: S&M Plan  
Reviewer: U.S. Nuclear Regulatory Commission  
Comment: 5. Existing Seeps

DOE should include provisions in the S&M Plan that any identified seep on or down-gradient from the disposal cell will be sampled during the ground-water monitoring schedule.

SECTION 2

Response: Page: 4-4 By: D. Heydenburg Date: Mar 11, 1993

Comment acknowledged.

Plans for Implementation:

Section 4.2 of the LTSP was revised to include seeps in the groundwater sampling and analysis plan.



UMTRA DOCUMENT REVIEW FORM

SECTION 1

Site: Burrell, Pennsylvania, Date: Nov. 20, 1992  
Document: S&M Plan  
Reviewer: U.S. Nuclear Regulatory Commission  
Comment: 6. Title Transfer

- a. The Site Description (Section 1.2) mentions transfer of title of the Burrell site to the Federal Government. It does not specify if it includes both the fenced area (CA-200) and the unfenced railroad tracks area (CA-800). DOE should revise this section to clearly describe the two areas as they relate to this LTSP, making reference to tract numbers as applicable.
- b. As-Built Topographic Map, Sheet 1 of 2 (Drawing No. CAN-VP200-1C-0104) should include the property boundaries of Tract 201 and 201E as per their legal description, and a legend for both the fence and the tract boundary.
- c. Page 2 of the Legal Description of Tract No. 201E has been mistakenly copied on the back of Page 1 of that of Tract No. 201. This error should be corrected.

SECTION 2

Response: Page: 1-1 By: T. Monaghan  
P. Martinez Date: Mar 11, 1993

Comments acknowledged.

Plans for Implementation:

- a. Section 1.2 of the LTSP was revised by including real estate documentation in Appendix A, and by further defining both tract boundaries.
- b. A map showing both tract boundaries and the disposal site's fence boundary is now included in Appendix A as Figure A.1.
- c. The error was corrected.