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50-367

Mr. Harold R. Denton
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In response to your letter of November 20, 1981, in which you requested our comments on the proposed Bailly Nuclear One site restoration plan, we offer the following comments:

1. Sealing and capping of wells: We are unclear about the extent of proposed sealing/capping of wells, sump casings, transducers, etc., before backfilling in the excavation and in areas separated from the excavation. We recommend that all Unit 3 wells in the excavation be filled with concrete before backfilling. Because of the hydrologic connection between Units One and Three at the excavation site, wells which are not cemented are potential avenues for flow between the lower sand and upper sand aquifers. While this would probably not appreciably alter the flow system in either aquifer unit, it could allow any future contamination that might occur in the lower sand aquifer to migrate more easily into the upper sand near the excavation site. In such a case, the west end of the Cowles Bog Wetland Complex could be impacted if water of undesirable quality would move through the slurry wall or the sheet pilings on the northeast part of the excavation.

Monitoring wells outside the excavation which are necessary to future monitoring should not be capped.

2. H-Piles: We see no problems arising from the leaving-in-place of the H-Piles after cutting them off at +8 feet. Their total removal might destroy the integrity of the hydrologic regime of the area.

3. Slagged Lay-Down and Railroad Spur Areas: There is inadequate information for us to be able to comment on the proposal for the slagged lay-down area and railroad spur area. This area, from the plan description, appears to be adjacent to Lakeshore property. We would need more information, including a map, to evaluate this part of the proposed plan.

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Add: Harold Denton

4. <u>Backfill Material</u>: Groundwater flow near the excavation could also be affected by the nature of the backfill material. If this material differs appreciably in hydrologic conductivity from the original material, the water table altitude may differ, which could slightly alter the shallow groundwater regime. The mineralogical and chemical composition of the backfill material could affect groundwater quality near the Cowles Bog Wetland Complex if the material is significantly different from the original material. Even if the water is potable, the chemistry of dissolved constituents may differ enough to have an impact on plants in the wetlands. Thus, quartz sand such as originally was present, is the most desirable fill material. The following backfill materials appear suitable:

a. Material removal from the excavation or other clean, inorganic fill materials of a character not appreciably different in hydrologic conductivity or quality from the original material.

b. Sand, presently located on the Bailly site which is silicious in composition and arenaceous in size, or sand of the type generally found in the area surrounding the Bailly site.

We are assured that the Nuclear Regulatory Commission will retain its regulatory responsibility through completion of the Bailly Nuclear One site restoration. We are pleased with NRC's and NIPSCO's intention to restore the property and we appreciate this opportunity to make comments on the plan.

Sincerely,

Nancy C. Garrett
ACTING DEPUTY
Director