

Department of Energy Albuquerque Operations Office P. O. Box 5400 Albuquerque, New Mexico 87185-5400

FEB 1 0 1994

Mr. Larry Mize Section Manager Groundwater Protection Division State of Utah 168 N. 1950 W. Salt Lake City, UT 84114

Dear Mr. Mize:

The Department of Energy's (DOE) Uranium Mill Tailing Remedial Action (UMTRA) Project is proposing a change to the groundwater protection strategy for the UMTRA disposal cell near Green River, Utah.

Enclosed is a white paper that discusses the propose change and includes the technical position that supports the change in the groundwater protection strategy.

Ar proximately one week ago, the white paper was informally transmitted to the Nuclear Regulatory Commission (NRC). On February 8, 1994, the DOE Project Office conducted a conference call with the NRC's Green River, Utah, UMTRA Project Manager and technical staff. During the conference call, the NRC said they have neither observed a fatal flaw nor a deficiency in the proposed change and gave the green light to proceed.

To proceed with the proposed change to the groundwater protection strategy for surface remedial action disposal, the following actions are required: 1) modifying the Surface Remedial Action Plan (RAP); 2) modifying the final Long -Term Surveillance Plan (LTSP); and 3) obtaining the NRC's and the state of Utah's concurrence on the RAP modification.

Please review the enclosed white paper that includes the technical solution supporting the groundwater protection strategy. Also, note that the proposed changes, once finalized and concurred upon would eliminate the need for the neutron access tubes that now exist in the tailing disposal cell. Another change would concern the designated Point of Compliance (POC) wells. Because a narrative supplemental standard would be the new strategy based on wide spread ambient contamination not caused by the milling activities at the former processing site, the need for POC wells would be eliminated. However, the DOE proposes to keep the wells and continue to monitor at a reasonable frequency as a best management practice to ensure continued protection of human health and the environment; and to verify the disposal cell continues to perform as designed.

I suggest that the DOE Project Office and your designated point of contact representing the state of Utah have a conference call after the white paper has been reviewed. It would be advantageous to the DOE if the conference call can take place within the next two weeks.

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Mr. Larry Mize

The DOE would not ask for the state of Utah's formal concurrence until the modified RAP has been formally transmitted to the designated point of contact at the state of Utah.

If you have any questions, please call me at (505) 845-5657 or Steve Hamp, the DOE site manager at (505) 845-5640.

Sincerely,

Don Motelen

Don Metzler Hydrology Manager Uranium Mill Tailings Remedial Action Project Office

Enclosure

cc w/o enclosure: L. Morten, Utah M. Layton, NRC S. Hamp, UMTRA F. Bosiljevac, UMTRA