

Albert R. Chernoff, Project Manager
 Uranium Mill Tailings Remedial Action
 Project Office
 U.S. Department of Energy
 Albuquerque Operations Office
 P.O. Box 5400
 Albuquerque, New Mexico 87185-5400

FEB 18 1994

Dear Mr. Chernoff:

The Nuclear Regulatory Commission staff has completed its review of the final Long-Term Surveillance Plan (LTSP) for the Lakeview, Oregon Uranium Mill Tailings Remedial Action (UMTRA) Project site. A previous review by NRC staff identified 29 open issues with the preliminary final LTSP for the Lakeview site. All but four of these previously identified issues have been adequately addressed in the comment responses, or in the revisions to the final LTSP document. One additional open issue relating to the absence of title transfer information has also been added.

Details of these five open issues are provided in the enclosure. For consistency in tracking the open issues, the enclosure uses the same numbering convention used to identify open issues in the Comment and Response Document (NRC issues 1-29 and Grand Junction Project Office issues 30-35), which accompanied the final LTSP. Satisfactory resolution of these open issues is necessary for NRC acceptance of the LTSP, and subsequent licensing of the Lakeview site.

If you have any questions regarding our comments, please contact Dan Gillen at (301) 504-2517, or the NRC project manager, Michael Layton, at (301) 504-2584.

Sincerely,

(Signature)

Joseph J. Holonich, Acting Chief
 Uranium Recovery Branch
 Division of Low-level Waste Management
 and Decommissioning
 Office of Nuclear Material Safety
 and Safeguards

Enclosure: As Stated
 cc: S. Hamp, DOE, AL
 C. Smythe, DOE, AL
 D. Bierley, TAC, AL

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DATE	02/16/94		02/16/94		2/19/94		1/194	1/194

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Dear Mr. Chernoff:

The Nuclear Regulatory Commission staff has completed its review of the final Long-Term Surveillance Plan (LTSP) for the Lakeview, Oregon Uranium Mill Tailings Remedial Action (UMTRA) Project site. A previous review by NRC staff identified twenty-nine open issues with the preliminary final LTSP for the Lakeview site. All but four of these previously identified issues have been adequately addressed in the comment responses, or in the revisions to the final LTSP document. One additional open issue relating to the absence of title transfer information has also been added.

Details of these five open issues are provided in the enclosure. For consistency in tracking the open issues, the enclosure uses the same numbering convention used to identify open issues in the Comment and Response Document (NRC issues 1-29 and Grand Junction Project Office issues 30-35), which accompanied the final LTSP. Satisfactory resolution of these open issues is necessary for NRC acceptance of the LTSP, and subsequent licensing of the Lakeview site.

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NAME	MLAYTON/JJ	<input checked="" type="checkbox"/>	DGILLEN	<input checked="" type="checkbox"/>	JHOLONICH				
DATE	2/16/94	<input checked="" type="checkbox"/>	2/16/94	<input checked="" type="checkbox"/>	1/194		1/194		1/194

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NRC Comments on the
final Long-Term Surveillance Plan (LTSP)
Lakeview, Oregon Uranium Mill Tailings Remedial Action
(UMTRA) Project Site

Open Issue	Description
8.	If 50 percent or more of the contaminated materials were placed wet of optimum, there exists a potential for millions of gallons of excess water to be present in the cell. "Pressure equilibration" would presumably be in the form of squeezing the water from the voids of the tailings, thus creating a strong potential for seepage, likely through the embankment toe. The Department of Energy (DOE) should include procedures in the LTSP for specific surveillance of the presence or absence of seepage from the disposal cell toe.
18.	DOE recommends expanding the monitoring frequency of the Point of Compliance (POC) wells to once every five years. DOE also plans to reevaluate the monitoring program once every five years. DOE's recommended monitoring schedule would allow only one set of monitoring results beyond the post-closure baseline before the program would be reevaluated. DOE's recommendation is based on engineering design and siting considerations at the disposal site. Given that one purpose of the post-closure monitoring is to verify that the disposal cell is performing according to design, one set of sampling results beyond the baseline is not adequate for a credible reevaluation. DOE should revise the LTSP to indicate that POC monitoring will be performed on an annual schedule, then reevaluate the sampling schedule after five-years.
22.	DOE must include copies of the agency notification agreements in the LTSP. These agreements with the appropriate Federal and State agencies describe the circumstances and DOE notification procedures for reporting unusual events which could impact the integrity of the disposal cell.
23.	Based on the erosion problems that have occurred at the toe of the disposal cell, the staff concludes that specific measures for observing erosion should be included in the LTSP. The staff is aware that significant erosion has occurred at the toe of the cell; based on photographs, the erosion appears to have occurred to the full 3-foot depth of the rock toe. Therefore, it appears that a near-design condition resulted from normal rainfall and runoff, without the occurrence of any severe design rainfall event. This

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Open Issue	Description
23. (cont.)	makes careful observation of the toe and the ditch outlet very important. In addition, it is not clear how much erosion resistance is provided by the trench drains, where surface water may also tend to concentrate. Therefore, observations of erosion in these specific trench areas are also important. DOE should revise the LTSP to provide surveillance of these specific features of the site.
36.	The text indicates that the Army Corps of Engineers will coordinate with the State of Oregon on the actual transfer of title, after NRC concurs that remedial action is complete. NRC has concurred in the completion of remedial action, as shown in Attachment 2 of the LTSP. DOE must provide the court house recording information in the LTSP. Until this action occurs and transfer is recorded, DOE has no title.