

MAR 4 1994

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

Dear Mr. Chernoff:

Mr. Frank Bosiljevac's letter of January 18, 1994, transmitted to the Nuclear Regulatory Commission for review and concurrence, Revision 3, Review A, to the Remedial Action Inspection Plan (RAIP) for the Ambrosia Lake, New Mexico, Uranium Mill Tailings Remedial Action (UMTRA) Project site. The NRC staff's review has resulted in comments detailed in the enclosure.

NRC staff will concur in the RAIP when the identified comments are adequately addressed. Any questions may be addressed to the NRC Project Manager, Allan Mullins, at (301) 504-2578.

Sincerely,

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: C. Smythe
M. Scoutaris
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REVIEW OF REMEDIAL ACTION INSPECTION PLAN
FOR THE AMBROSIA LAKE, NEW MEXICO
URANIUM MILL TAILINGS REMEDIAL ACTION PROJECT SITE

1. Section 6.4.1 of the Remedial Action Inspection Plan (RAIP) indicates that only specific gravity and sodium sulfate soundness tests will be performed on the La Cuchilla rock source. In general, this limited amount of testing is not considered to be acceptable. Unless adequate justification can be provided to substantiate the high quality and consistency of this rock source, the full suite of durability tests should be conducted, similar to those tests specified for subcontractor-proposed sources.
2. Section 6.4.4 of the RAIP indicates that certain durability tests, including schmidt hammer, tensile strength, and petrographic examination, will not be conducted for riprap types A and B at time of production. The U.S. Department of Energy (DOE) further indicated that initial test results from these three tests will be used along with other tests for scoring rock to be produced at a later date. As discussed in the Nuclear Regulatory Commission staff's comments on RAIPs at several other sites, use of previous test data is not considered acceptable for scoring rock to be produced at a later date. This procedure is unacceptable because rocks of differing quality or type could be produced from the same quarry, depending on the location in the quarry. DOE should either perform the entire suite of tests for all rock produced or use only the test results from tests that have been actually conducted on a sample which is representative of the rock to be used.
3. Section 6.5.6 of the RAIP should indicate that the procedures for verifying thickness of riprap layers will include using depth measurements on a specified grid, as conducted at various other Uranium Mill Tailings Remedial Action Project sites.

Enclosure