



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 07 1990

Mr. Mark Matthews, Project Manager
Uranium Mill Tailings Remedial Action
Project Office
U. S. Department of Energy
Albuquerque Operations Office
P.O. Box 5400
Albuquerque, NM 87115

Dear Mr. Matthews:

As you are aware, we have completed our review of the Grand Junction Preliminary Final Remedial Action Plan (RAP) and transmitted our Technical Evaluation Report (TER) to you. In addition, you have also submitted preliminary final RAPs for the Lowman and Falls City sites, a draft RAP for the Maybell site, and draft completion reports for the Green River and Spook sites. We have indicated in the past that schedule slips by the U.S. Department of Energy (DOE), coupled with pressure to meet the 1994 mandated completion date for the program, would lead to multiple concurrent submittals to the U.S. Nuclear Regulatory Commission (NRC). We have indicated that this would lead to a backlog of work at NRC that could impact your ability to proceed with site remediation. In anticipation of such multiple concurrent submittals, we agreed to perform reviews of in-house work based upon the priorities set by DOE during our weekly telephone conferences. We have also stated in the past that it is extremely important for DOE to ensure that documents submitted to us for review be of high quality. High quality documents can be reviewed more quickly and efficiently, thus, enabling my staff to better keep up with the multiple submittal of DOE documents that has evidently now begun. I would like to call your attention to certain problems related to document quality that were encountered during our Grand Junction RAP review, to avoid their reoccurrence in the future.

One significant problem was that design changes were being made right up to the point of submittal to NRC, resulting in inconsistencies between various parts of the documentation. Furthermore, at our October 11, 1990, meeting (which occurred over a month after the submittal) it was evident that all aspects of the design had not been completely resolved. The excavation depth change is a significant one, and requires consideration of impacts to other aspects of the design, including stability, settlement, and infiltration performance assessment. These impacts were not addressed in the RAP. Rather, they were briefly touched upon in a note to reviewers tucked into one of the RAP attachments.

In addition, it appears that, in preparation of the RAP, there was a lack of interaction between the Technical Assistance Contractor (TAC) and the Remedial Action Contractor (RAC). For example, the RAP did not clearly describe what was intended for the rock/soil final layer of the cover, i.e., an engineered rock/soil matrix or a loose topsoil for rooting vegetation. It was not clear to the reviewing NRC staff, and it did not appear during the October 11, 1990, meeting that the DOE/TAC/RAC staff were of one mind as to its design.

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Mark Matthews

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Lack of interaction between the TAC and RAC was further evidenced by the presentation of two independent infiltration analyses. Multiple inconsistencies in the specifications and the Remedial Action Inspection Plan (RAIP) point toward insufficient coordination among RAC contributors.

Based on review of the Remedial Action Selection Report (RAS) included as part of the Grand Junction RAP, we conclude that in addition to the need for reference improvements as indicated in my August 13, 1990, letter, many sections of the RAS need to be strengthened to provide a complete discussion of the particular aspect and its contribution to meeting the EPA standards. For example, the section on the cover design should not just state each layer's function, but should also reference pertinent design calculations, summarize the results of those calculations, and discuss the resulting design in terms of the EPA standards.

I suggest that we discuss these documentation issues during our next DOE/NRC management meeting, scheduled for December 11, 1990. Please contact me or Dan Gillen of my staff (FTS 492-0517), if you have any questions.

Sincerely,

ORIGINAL SIGNED BY

Paul H. Lohaus, Chief
Operations Branch
Division of Low-Level Waste Management
and Decommissioning, NMSS

cc: R. Lightner, DOE Hq.
M. Abrams, DOE Alb.

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SUBJECT ABSTRACT: INDICATE SHORTCOMINGS OF GRAND JUNCTION RAP

OFC :LLOB :LLOB :LLOB

NAME:DGillen/jj * :MFliegel * :PLohaus

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I suggest that discussion of these documentation issues be added to the agenda for our next DOE/NRC management meeting, scheduled for December 11, 1990. Through discussion in this forum, we can prevent similar problems with future documentation. In the meantime, should you wish to discuss this transmittal, please contact me or Dan Gillen of my staff (FTS 492-0517).

Sincerely,

Paul H. Lohaus, Chief
Operations Branch
Division of Low-Level Waste Management
and Decommissioning, NMSS

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