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Environmental Protection Agency  
ATTN: Mr. Paul Cahill, Director  
Office of Federal Activities  
Washington, D.C. 20460

Dear Mr. Cahill:

This letter is in response to your December 28, 1982 letter regarding cleanup standards proposed in the NRC's FES on decommissioning of the TVA Edgemont uranium mill. As suggested in your letter, the NRC headquarters and Uranium Recovery Field Office staff met with EPA headquarters and Region VIII staff on January 25, 1982. The purpose of the meeting was to discuss EPA's concern that, contrary to EPA's standards for Title I sites and the anticipated standards for active tailings sites, the cleanup limits proposed in the FES would allow for leaving unnecessarily high levels of residual contamination at the mill site once tailings were transported to a new disposal area.

The NRC's objective was to require removal of all tailings from the disposal site, but also allow flexibility in what amount of residual contaminated soil below the tailings would have to be moved. The NRC staff recognized that from a cost benefit standpoint it was not reasonable or desirable to remove all residual contaminated subsoils from the site. To allow this flexibility and since there were no specific EPA or NRC regulatory limits for cleanup of such residual contamination at licensed tailings sites, TVA was urged by the NRC staff to use a recently developed NRC document, "Disposal or Onsite Storage of Residual Thorium or Uranium from Past Operations" in developing proposed cleanup criteria for residual contamination at the Edgemont site. The NRC, after independently evaluating TVA's proposed criteria and determining that they were equivalent to the criteria in the subject NRC document, presented them in the FES and indicated that further characterization of residual contamination, once tailings were moved, would be necessary to determine specific cleanup levels. In our meeting, EPA staff argued that the referenced NRC document was developed for special cases where there were no nearby disposal areas. While we agreed on this point, we still felt that the position paper was a reasonable approach and provided the flexibility necessary in determining what levels of residual contamination beneath the piles needed to be cleaned up. In our discussions, it became readily apparent that the basic objective of our respective staffs was essentially the same. The EPA staff pointed out that the Title I standards, which present a 15 pCi/g Ra-226 limit above background in subsurface soils, also allow for supplemental standards, Section 192.21(c), that would also allow similar flexibility when necessary.

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In light of the above discussions and since the EPA standards were developed for decommissioning uranium mills, albeit inactive mills, it was agreed that the cleanup criteria for residual contamination at the Edgemont site would be modeled after the Title I standards. It was agreed that such an approach would allow sufficient flexibility on a cost-benefit basis for determining the amount of contaminated material that would be moved. Based on similarities in the criteria in the Title I standards and the subject NRC document, we expect that there would be little or no difference in overall activities, regardless of which criteria are used. When EPA issues standards specifically for active mills, we recognize that adjustments to the criteria being used for Edgemont may be necessary.

In addition to the cleanup criteria, we also discussed Region VIII's concern that there was insufficient site characterization data in the Edgemont FES. In the FES we only presented that data necessary to evaluate the basic alternatives being evaluated for decommissioning of the Edgemont site. We explained in our meeting that the FES was a conceptual type document that looked at basic site data and alternatives which were evaluated against specific criteria to determine environmental impacts. The license to be issued to TVA will contain several license conditions that will not only require TVA to meet these criteria, but also conduct studies and obtain more comprehensive site data to show how these criteria will be met. As we receive these data, we will perform additional evaluations prior to approving specific plans to implement the authorized decommissioning. EPA Region VIII will be provided copies of these data as they are received and our evaluations when they are completed.

We appreciated the opportunity of meeting jointly with your headquarters and Region VIII staff and feel that the meeting was beneficial in resolving EPA's concerns. As discussed at the meeting, we will keep Region VIII staff informed of significant developments at the Edgemont site.

Sincerely,

Original Signed By:

R. Dale Smith, Director  
 Uranium Recovery Field Office  
 Region IV

CC: R. Brich, S.D.  
 T. Donovan, TVA  
 B. Magnuson, U.S. Senate Staff

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