STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH
Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80222-1530
Phone (303) 692-2000

Laboratory Building
4210 E. 11th Avenue
Denver, Colorado 80220-3716
(303) 691-4700

Roy Romer
Governor

Patricia A. Nolan, MD, MPH
Executive Director

May 11, 1994

Mr. Jay Pape
UMTRA Project Office
2155 Louisiana Blvd. NE, Suite 4000
Albuquerque, New Mexico 87110-5414

Re: Grand Junction RAP Concurrence

Dear Mr. Pape:

The Colorado Department of Health (CDH) has reviewed the Department of Energy (DOE) responses to CDH and Nuclear Regulatory Commission (NRC) comments on the Grand Junction RAP. Based on this review we feel that there are still outstanding questions which will prevent our concurrence on the RAP, as requested by DOE. These questions are as follows.

1) Both NRC and CDH requested cell performance monitoring. The response to NRC indicates that monitoring of the paleochannels will be performed, with the details to be worked out in the Long Term Surveillance and Monitoring Plan (LTSMP). However, the response to CDH was that this monitoring was not necessary. We need clarification on whether DOE does or does not intend to monitor the paleochannels. In addition, CDH is concerned that monitoring plan details will be left to the LTSMP, as the role of CDH in reviewing and approving of this document is not clear. CDH would be more comfortable with this approach if DOE committed to giving CDH concurrence authority for that document.

2) CDH also requested additional performance monitoring of the cell, regarding performance of the cover and the ability of the bedrock to accept seepage as postulated in the RAP. DOE has not addressed these issues.

3) DOE did not provide the page changes for Section 3.4 of Attachment 4.

In addition, it would be helpful in the future if you copied both the CDH Denver and CDH Grand Junction offices on RAP correspondence, as both offices are involved in the review. In this case, DOE did not copy the site manager for Grand Junction.

Please let us know how you would like to resolve the remaining issues.

Sincerely,

Paul Oliver

Paul Oliver
Grand Junction Site Manager

cc: D.Rom, NRC

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