Mr. 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:

Enclosed is a conversation record of the telecon held on April 12, 1994 between the U.S. Nuclear Regulatory Commission staff and the U.S. Department of Energy and contractor staff. The telecon was held at your staff's request to discuss NRC comments on DOE's geomorphological report, dated May 1993, on Chartiers Creek bank stability associated with the Completion Report issue for the Canonsburg, Pennsylvania, Uranium Mill Tailings Remedial Action Project site.

If you have any questions, please contact the NRC Project Manager, Mike Fliegel at (301) 415-6629.

Sincerely,

15 Joseph J. Holonich, Chief High-Level Waste and Uranium Recovery Projects Branch Division of Waste Management Office of Nuclear Material Safety and Safeguards

NH16 1/1

Enclosure: As stated

C. Smythe, DOE Alb CCI

- S. Hamp, DOE Alb
- D. Bierley, TAC Alb
- J. Yusko, PA DER

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NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Steve Hamp Ed Artiglia, and John Lamler Mohammad Haque, Mike Fliegel, Ted Johnson, Dan Rom, Keith McConnell, John Thoma	ORGANIZATION (of DOE, Albuque TAC, Albuque NRC, NMSS/DW	fice, dept,etc) erque, NM erque, NM M	TELEPHONE NO (505) 845 (301) 504	TELEPHONE NO. (505) 845-5640 (301) 504-2580	

SUBJECT: Canonsburg, PA - Completion Report issue identified in NRC's letter of March 8, 1994 in reference to the DOE's Geomorphological Study Report

SUMMARY: This telecon was held at the request of DOE's Site Manager, Steve Hamp, to discuss NRC staff comments on DOE's Geomorphological Study Report, dated May 1993, relating to the stability of the Chartiers Creek bank on the northwest portion of Area A. NRC has had a long-standing concern about whether there is control of the radioactive material buried in this area for the minimum 200-year period. Hamp indicated that, though the report discusses sloughing and erosion problems on the Residential Area side of the Chartiers Creek bank, there was no need for any immediate action by DOE as there was no immediate concern of any exposure of contaminated materials as a result of sloughing of the banks of the Chartiers Creek. Hamp reiterated DOE's argument that since this issue surfaced after NRC had concurred in the Remedial Action Plan, NRC should concur in the Completion Report (CR). The issue itself can be resolved after the site passes into the general license by tying it to the Long-Term Surveillance Program (LTSP). NRC staff stated that concurrence and licensing of the site will not occur with an issue of this nature unresolved. The staff discussed the following options available to DOE:

**Option 1:** If DOE can not demonstrate that the minimum 200-year stability criteria with no maintenance is met, DOE should consider a plan that relies on enhanced surveillance and a commitment to long-term maintenance to resolve this issue. Of particular concern to NRC is whether one severe event or series of events, occurring between DOE surveillance inspections, could result in release of radioactive material from that area. DOE can resolve this issue, either by showing that release of radioactive material between surveillance inspections is sufficiently unlikely, or by protecting the area from a sufficiently severe event.

**Option 2:** DOE can revise the geomorphologic report and/or other reports to demonstrate that Area A will be stable for at least 200 years, i.e., that no radioactive material will be released, without relying on active maintenance. DOE can propose physical improvements, e.g., recontouring slopes and constructing erosion protection, to achieve 200 year stability.

Hamp indicated that DOE will likely pursue option 1. Technical details of the analysis needed to address NRC concerns, were discussed. Additional information and analyses will be needed to justify either of the options chosen by DOE.

Hamp also requested another telecon to be scheduled next week to discuss the other outstanding issues identified in NRC's March 8, 1994 letter.

ACTION REQUIRED: DOE to respond.

NAME OF PERSON DOCUMENTING CONVERSATION MONAMMAd Hague	SIGNATURE	w. Hague	DATE: 4/12/94
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