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Mr. James A. Morley, Project Manager
Uranium Mill Tailings Project Office
U.S. Department of Energy
P. O. Box 5400
Albuquerque, NM 87115

WM- 54462
MAR
(Return to WM, 623-SS)

Dear Mr. Morley:

My staff has reviewed the Remedial Action Concept Papers (RACP's) for the Grand Junction and Rifle sites. Our comments were discussed by telephone with Mr. Chris Timm and Mr. Leon Stepp of Jacobs Engineering on February 23, 1983. We are transmitting these comments formally with this letter. If you have any questions regarding our comments, please contact Mr. George C. Pangburn at (301) 427-4574 commercial or 427-4574 FTS.

Sincerely,

Original signed by

Edward F. Hawkins, Acting Chief
Low-Level Waste Licensing Branch
Division of Waste Management

Enclosure:
Comments on Rifle and Grand
Junction reports

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PDR WASTE
WM-54 PDR

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OFC	: WMLL: <i>[Signature]</i>	: WMLL	: WMLL	: WMLL <i>EFH</i>	:	:
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NRC LOW-LEVEL WASTE LICENSING BRANCH COMMENTS ON
DRAFT REMEDIAL ACTION CONCEPT PAPER FOR THE RIFLE SITE

1. Section 4.2, Page 7: Sentence beginning "The NRC has not..."
This sentence incorrectly implies that NRC has a responsibility for issuance of regulations under Title I of the Uranium Mill Tailings Radiation Control Act of 1978. We suggest the sentence either be modified to correct this implication or be removed.
2. Section 5, Page 11, First paragraph: This paragraph identifies alternatives for consideration in the Rifle paper, but does not mention codisposal with the Grand Junction tailings at a new site. By contrast, the Grand Junction RACP considers codisposal as an alternative for the Lucas Mesa site. Inasmuch as codisposal is discussed in the Grand Junction paper, we believe it should also be discussed here.
3. Section 5.2, Page 13, First paragraph: The discussion of stabilization-in-place includes mention of a gravel layer to be added to minimize wind and water erosion. Later (Section 5.3, Page 18, First paragraph) the relocation alternative mentions either revegetation or installation of a rock cover as an erosion control. Is there a reason for not including revegetation under the stabilization-in-place alternative?
4. Section 5.3, Page 15, First paragraph: A second site for relocation of tailings, Flatiron Mesa, is mentioned in passing. If the site is suitable we suggest it be considered on an equal basis with Lucas Mesa. Conversely, if this site is not a realistic alternative, it would be useful to mention why it was not considered further.
5. Section 6.2, Page 19, First paragraph: Last sentence in paragraph should be modified to read: "These concerns as well as general site suitability will be addressed during the studies for the EIS."
6. Section 6.3, Page 20, Second paragraph: The last sentence in the paragraph mentions items requiring further study. It is not clear from the preceding sentences whether these items need study for a

determination on site feasibility or on reprocessing feasibility. Clarification would be useful.

7. Section 8, Page 21, Second paragraph: The copy received by NRC was distorted on this page and does not show the range of costs for various alternatives.

NRC LOW-LEVEL WASTE LICENSING BRANCH COMMENTS ON DRAFT
REMEDIAL ACTION CONCEPT PAPER FOR THE GRAND JUNCTION SITE

1. Section 3, Page 6, First paragraph: The second sentence mentions EPA standards being issued in December, 1982 while the first paragraph on page 7 mentions that the standards were published on January 5, 1983. These dates should be reconciled.
2. Section 4.2, Page 7, First sentence: See comment 1 on attached NRC comments on Rifle RACP.
3. Section 5.2, Page 14, First paragraph: See comment 3 on attached NRC comments on Rifle RACP.
4. Section 5.3, Page 15, Second paragraph: In the Rifle RACP, the Lucas Mesa Site was considered suitable for disposal of the Rifle tailings. However, the cited paragraph finds Lucas Mesa to be "environmentally and economically less acceptable" for Grand Junction tailings alone, but suitable enough for co-disposal of Grand Junction and Rifle tailings. It is not clear as to how the site can be the prime relocation site for Rifle and yet be considered less acceptable for Grand Junction. Clarification of this point is needed here.
5. Section 5.3, Pages 20-21: The description of the Lucas Mesa site does not provide any basis for the conclusion referenced in Item 4 above that it is "environmentally and economically less acceptable." Whatever considerations led to this conclusion are not presented here for the reader to evaluate.
6. Section 6.2, Page 22, Last sentence: See comment 5 on attached NRC comments on Rifle RACP.
7. Section 6.3, Page 23, Last paragraph: As noted in Item 5 above, the conclusion that "Either the 6 & 50 Reservoir or the Cheney Reservoir site appears to be suitable..." is unsupported. The basis for this conclusion should be provided.
8. Page 26, Figure 8.1: Under the heading "Activity/Event," the listing "Complete and Publish DEIS" should read as "Complete and Publish FEIS."