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Richard H. Campbell  
UMTRAP Project Office  
U.S. Department of Energy  
Albuquerque Operations Office  
P.O. Box 5400  
Albuquerque, NM 87115

Dear Mr. Campbell:

This is in response to your August 11, 1982 request for NRC comments on the final draft Remedial Action Concept Paper (RACP) for the Durango, CO inactive uranium mill tailings site. These comments were discussed by Kathleen Hamill of my staff and John Themilus of the Albuquerque Project Office on August 31, 1982. It is my understanding that, on the basis of that conversation, all of these comments can be easily resolved. However, should you have any questions related to NRC's position on these matters, please don't hesitate to contact me.

Sincerely,

*[Signature]*  
Signed by:  
R. A. Scarano

Ross A. Scarano, Chief  
Uranium Recovery Licensing Branch  
Division of Waste Management

OFC	: WMUR <i>[Signature]</i>	: WMUR <i>[Signature]</i>	:	:	:	:
NAME	: KJHamill	: RAScarano	:	:	:	:
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ATTACHMENT I  
NRC STAFF COMMENTS ON  
AUGUST 1982 DOE DURANGO RACP

1. pg. 4 (Sec. 4.1): The Table 1 summary of EPA's interim remedial action cleanup standards indicates that remedial action would be required if Ra-226 concentrations on open lands were greater than 5 pCi/gm. This implies that remedial action would be necessary if measurements indicated that the total concentration was greater than 5 pCi/gm. In view of the specific language of the EPA standard, which references concentrations "attributable to residual radioactive material from any designated processing site," NRC interprets the interim EPA standard of 5 pCi/gm to be above background concentrations.
2. pg. 6 (Sec. 4.3): This section indicates that among the factors which must be considered in the evaluation process used for determining the preferred option is meeting the requirements of the NRC regulations. As previously indicated, NRC's review will be limited to assuring that the proposed DOE action will meet the EPA standards as they are finally promulgated. The fact that the NRC regulations do not apply to Title I activities is accurately reflected in the discussion contained in Section 4.2. Therefore, the reference to meeting the NRC regulations in Section 4.3 is inconsistent and inappropriate.
3. pg 6 (Sec. 4.3): The discussion of environmental factors to be considered in the evaluation of alternative options mentions the effects on potable ground water. The proposed EPA standard defines an underground source of drinking water to be an aquifer in which the groundwater contains less than 10,000 milligrams/liter total dissolved solids. Thus, it appears that EPA intended that water of a quality appropriate for other uses, such as agricultural uses, also be considered and protected. Various state water quality standards, such as Wyoming (which establishes 500 mg/l TDS for domestic use and 5000 mg/l TDS for livestock use) and New Mexico (which establishes a value of 1000 mg/l TDS for both domestic and agricultural use), provide evidence supporting this interpretation by establishing limits for use categories other than domestic drinking water well within the 10,000 mg/l value. Therefore, NRC staff considers use of the term "potable" ground water may too narrowly restrict the scope of the evaluation of potential impacts on groundwater.
4. pgs. 8-9 (Sec. 5): In the discussion of stabilization measures for Options 2 and 3 it is stated that a cover of "riprap" may be required to protect against long-term surface erosion. It is not entirely clear what the phrase "riprap" is intended to imply; however, such a phrase can have very precise meanings. It might be inappropriate to use such descriptive terminology at this early conceptual stage.
5. pg. 9 (Sec. 5): In the discussion of Option 3, offsite disposal, it is stated that after reclamation "access to the disposal site would be

restricted." This statement seems to imply that a fence would be necessary to ensure limited access to the site. Since the level of ongoing maintenance that will be required will vary depending on the disposal site selected, this concept might be better expressed by stating that a "site control program" will be established.

6. pgs. 15-16 (Secs. 8 and 9.5): In Section 8 it is indicated that 30% of the estimated costs are attributable to engineering, environmental analysis, site acquisition, and maintenance and surveillance activities. In Section 9.5 it is stated that the Technical Assistance Contractor (TAC) will be responsible for conducting maintenance activities at disposal sites following completion of remedial action. In view of the fact that the level of ongoing site control will likely vary in relation to the disposal option selected, it is unclear what maintenance activities are currently envisioned.