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JShaffner

APR 30 1985

Ref: SA/KNS

Mr. John D. Vaden, Supervisor
Radiological Health Section
Department of Human Resources
505 East King Street
Carson City, Nevada 89710

WM Record File

WM Project 8

Docket No. _____

PDR ☒

LPDR _____

Distribution:

SHASTNER

STARMER

LBA DEM

(Return to WM, 623-SS)

L3

Dear Mr. Vaden:

This is in reference to your March 4, 1985 letter requesting NRC review and comment on the revised US Ecology closure plan for the Beatty low-level radioactive waste disposal facility. Waste Management (WM) staff reviewed the revisions to the closure plan which were intended to address areas of concern that WM raised on the previous version.

It is the staff's opinion that the revised closure plan does not adequately address a number of these concerns. We have included three enclosures which form the basis of the WM opinion. Enclosure 1 was prepared by the Low-Level Waste Project Branch. Enclosure 2 was prepared by the Geotechnical Branch and presents comments regarding concerns with respect to flood protection, environmental monitoring and transport processes in the unsaturated zone. Enclosure 3 provides comments from the perspective of the Engineering Branch.

We do not feel that the best way to resolve these rather complex issues is for the licensee to respond item by item to each of the comments as was done in the past but rather to reflect the points made in an overall revision of the plan. The issues involving site closure are complex and a common understanding by all parties involved is necessary. If you feel it would be useful, NRC staff would be willing to participate in a meeting with the licensee and the State to discuss and perhaps arrive at resolution of the technical, administrative, and financial concerns raised herein.

Sincerely,

Original signed by:
D. Nussbaumer

Donald A. Nussbaumer
Assistant Director for
State Agreements Program
Office of State Programs

Enclosures:
As stated

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PDR WASTE
WM-8 PDR

OFFICE	SA <u>KNS</u>	SA <u>DA</u>					
SURNAME	KNSchneider/bh	DA Nussbaumer					
DATE	4/29/85	4/29/85					