### DEPARTMENT OF ENERGY ALBUQUERQUE OPERATIONS OFFICE CONTRACT NO. DE-AC04-83AL18796

## Vicinity Property Completion Report

Remedial Actions
Contractor
for the
Uranium Mill Tailings
Remedial Actions
Project



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VICINITY PROPERTY COMPLETION REPORT

AT

DU-144A S TRUCK BY-PASS (CAMINO DEL RIO) DURANGO, COLCRADO

May 16, 1991

FOR

URANIUM MILL TAILINGS REMEDIAL ACTION PROJECT OFFICE
ALBUQUERQUE OPERATIONS OFFICE
U.S. DEPARTMENT OF ENERGY
ALBUQUERQUE, NM

BY

MK-FERGUSON COMPANY

AND

CHEM-NUCLEAR ENVIRONMENTAL SERVICES, INC.

MK-Ferguson Company has been granted authorization to perform remedial action under the Uranium Mill Tailings Radiation Control Act of 1978, Public Law 95-604. Remedial action was done in accordance to the EPA Standards for Cleanup of Lands and Buildings Contaminated with Residual Radioactive Material from Inactive Uranium Processing Sites, 40 CFR 192.12, 192.20-23.

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### Table

3.1 Verification Soil Sample Survey

### 1.0 SUMMARY

PROPERTY NUMBER: DU-144A

PROPERTY ADDRESS: TRUCK BY-PASS (CAMINO DEL RIO)

DURANGO, COLORADO

PROPERTY OWNER: COLORADO DEPARTMENT OF HIGHWAYS

214 WEST 6th STREET

DURANGO, COLORADO 81301

PROPERTY CATEGORY: OPEN LAND

REMEDIAL ACTION CONTRACTOR: MK-FERGUSON COMPANY

CONSTRUCTION SUBCONTRACTOR: \*

DIOLOGICAL CONTRACTOR: CHEM-NUCLEAR ENVIRONMENTAL

SERVICES, INC.

REA APPROVED: FEBRUARY 1, 1990

REMEDIAL ACTION STARTED:

REMEDIAL ACTION COMPLETED: \*

(APPENDIX C SIGNED)

VOLUME OF MATERIAL REMOVED: \*

<sup>\*</sup> Remedial action on this property was performed in conjunction with the Durango Site remediation and completed by the site subcontractor.

### 1.0 SUMMARY

Remedial action was completed on Vicinity Property DU-144A. All work on the property was performed as part of the Durango Site remediation.

Radiological surveys conducted following removal of contaminated material, but before property restoration, demonstrate that the property has been cleaned up to the EPA standards with the application of Supplemental Standards. This completion report recommends that the property be awarded with final certification.

### 2.0 OPERATIONS SUMMARY

### 2.1 Remedial Action Plan

The basic remedial action on this property was performed according to the Remedial Action Plan. The Remedial Action Plan called for remediation of the property by the Durango Site subcontractor.

### 2.2 Previously Unidentified Contamination

No new areas of contamination were identified during remedial action.

### 2.3 Unanticipated Items During Remedial Action

No unanticipated items occurred during remedial action on this property.

### 3.0 VERIFICATION SUMMARY

### 3.1 Radiological Survey Data

All survey data were acquired according to approved procedures.

### 3.1.1 Pre-Remedial Action Survey

The results of the survey defining the contaminated area requiring remedial action are presented on Drawing DU-144A-015.

### 3.1.2 Pre-Restoration Survey

### Exterior:

After removal of contamination, and prior to backfilling, a soil sample survey was conducted in the excavated areas. Soil samples were aliquoted from the 198 verification grids and analyzed by gamma spectroscopy with the opposed crystal system in accordance with Health Physics Procedure 015. The radium concentration in these soil samples ranged from 1 to 114 pCi/g, as described in Table 3.1.

Drawings DU-144A-020, DU-144A-021 and DU-144A-022 show the actual areas of excavation.

These results confirm that exterior contamination has been reduced to levels below the EPA standards for radium in soil in most areas (see section 3.1.3). Background for the Durango site is 1.5 pCi/g Ra-226.

### Interior:

There are no structures on this property.

3.1.3 JUSTIFICATION CHECKLIST FOR APPLICATION OF SUPPLEMENTAL STANDARDS

Application of	Supplemental	Standards	(SS) is	in accordance	with
40 CFR 192.22,	Subpart (x)	(check appr	opriate	Subpart):	

-	a)	Risk injury to worker/public
	b)	Environmental harm
X	c)	High cost relative to long-term benefits
	d)	High cost of cleaning up building relative to benefits
-	e)	No known remedial action
	f)	Radionuclides other than Ra-226 exist

### Brief Condition Description and Justification:

Five areas are proposed for application of supplemental standards.

Areas A, B and C have been excavated down to the water table and Ra-226 concentration in these Areas range from 40 pCi/g to 114 pCi/g. Further excavation in Areas A and C would require Z-pile along the rivers edge, pumping operations and water treatment. Continued excavation of Area B would require excavation of a 30 vertical cliff of radiological clean slag. As agreed upon by the RAC, TSC, CDH, DOE and NRC further excavation in these areas was not warranted due to the high cost relative to the long term benefits. These areas are covered with a minimum of two feet of backfill and riprap per the Durango Site Restoration Plan. With this cover in place general area exposure rates are near background levels. Background for the Durango Site is 14 micro R/hr. The estimated volume of contaminated material that remains in these areas is 125 cy.

Area D is presently covered with 3 feet of riprap. Contamination is sporadically distributed throughout the 2.5 foot layer of soil beneath the riprap. Ra-226 concentrations is soil in this area range from <1.5 to 35 pCi/g. General area exposure rates are near background. The estimated volume of contaminated material that remains in this area is 120 cy.

Area F is presently covered with 3 feet of riprap. Contamination is sporadically distributed throughout the 2 foot layer of soil beneath the riprap. Ra-226 concentrations in soil in this area range from <1.5 to 166.0 pCi/g. General area gamma exposure rates range from 16 to 25 micro R/hr. The estimated volume of contaminated material that remains in this area is a 600 cy.

Contamination in Area G does not exceed EPA standards for Ra-226; however, a lens of uranium was exposed at the high water mark on the bank of the Animas River. This lens varies from 1 to 6 inches in thickness. The extent to which the lens extends on to the property is undetermined due to an over burden of radiologically clean material that varies in thickness from 2 to 25 feet. This overburden consists mostly of slag generated by a lead smelter that operated from the 1880's to 1930. Ra-226 concentration in soil in the Uranium Lens Area range from <1.5 to 12.1 pci/g. The exposed portions of the uranium lens was covered with 2 feet backfill and riprap per the Durango Site Restoration Plan. With 2 feet of backfill and riprap over the exposed portion of the lens, exposure rates are near background levels.

All the Supplemental Standards areas are covered with a minimum of 2 feet of backfill and riprap.

General area gamma exposure rates on the property range from 14 to 25 micro R/hr. If a man spent 8 hours a day, 5 days a week, 50 weeks a year in a 25 micro R/hr. radiation field, he would receive about 50 millirem of gamma exposure in one year. This is one tenth the amount allowed the general public (10 CFR 20.105). The amount of contamination material that will remain in place is approximately 845 cubic yards.

The cost of removing the contaminated material would have been excessive, due to the need to remove the existing riprap and slag overburden from these areas and the need for additional engineering measures to achieve the work, compared to the actual health benefits realized.

Additional cost without application of Supplemental Standards = \$237,500.00.

This is a 304 percent increase over the estimated remedial action cost for the preferred option.

Yes	No	If	Supplemental Standards are Applied:
_X		1.	Open Land?
and the second second	_X	2.	Occupied Building?
-	_N/A	3.	If yes, to No. 2, is contaminated area beneath or within 10 feet of a building?
	_X	4.	Anticipated change of land use within the next 5 years?
	N/A	5.	If yes to No. 4, then will land use produce health risk?
_X			Is contamination in a habitable area?
- Ki	X REA	7.	Have owners comments been solicited? (Attach comments or record of teleconference). (See Appendix C).

Estimated volume of contaminated material to remain = 845 (cy).

Contaminated area to remain = 1150 (sy).

Exposure rate in contaminated area = 14 to 25 (micro R/hr) [at 3 feet above surface].

The Ra-226 concentration in soil in contaminated area =  $\leq 1.5$  to 166.0 (pCi/g).

### 3.2 Recommendation for Certification

### 3.2.1 Exterior:

One area of contamination was identified and removed. Soil samples after excavation and prior to backfilling indicate that the limits of 5 pCi/g in the surface 15 cm. and 15 pCi/g in any 15 cm. layer below the surface are not exceeded in most areas. Based on this information, we recommend that the exterior of this vicinity property be certified to be in compliance with EPA standards, with the application for Supplemental Standards, for the UMTRA Project.

### 3.2.2 Interior:

There are no structures on this property.

Table 3.1 VERIFICATION SOIL SAMPLE SURVEY Property DU-144A S

LOCATION (GRID NO.)	DEPTH (cm.)	CONCENTRATION (pCi/g)
A-29-15	15	2
A-29-17	15	2
A-29-21	46	
A-29-22	34	3
A-39-02	40	6 3 2
A-39-08	15	6
A-39-09	15	1
A-39-13	21	6 1 3 2 3 2 3 5 3 1 2 2 2 2 6 3 1 1 2 2 2 2 2 1
A-39-14	15	2
A-39-19	15	3
A-39-20	18	2
A-39-25	21	3
A-40-21	15	5
A-50-01	18	3
A-50-13	18	1
A-50-24	18	2
B-07-05	15	2
C-01-21	15	2
C-09-01	91	6
C-09-02	91	3
C-09-03	15	1
C-09-07	21	1
C-09-08	168	2
C-09-09	116	2
C-09-10	61	1
C-09-14	174	
C-09-15	113	14
C-10-06	18	13
C-10-07	15	4
C-10-08	15	3
C-10-09	15	5
*C-10-11	162	20
C-10-12	82	8
C-10-13	162	13
C-10-14	85	10
C-10-15	49	3
C-10-18	149	11
C-10-19	131	3
C-10-20	137	6
C-11-11	61	3 6 12 2
C-11-12	61	2

<sup>\*</sup> Areas where Supplemental Standards apply.

LOCATION (GRID NO.)	DEPTH (cm.)	CONCENTRATION (pCi/g)
C-11-16	91	2
C-11-17	76	2 2
C-11-18	37	2
C-11-19	61	10
C-11-20	61	9
* C-11-23	110	43
C-11-24	91	10
C-11-25	88	8
C-12-16	15	ĭ
C-12-21	61	1 2
C-12-22	61	9
* C-19-04	91	20
C-19-05	101	1
C-20-01	110	9
C-20-02	73	5
C-20-03	40	5 4
C-20-04	37	6
C-20-06	59	6 2
C-20-07	177	5
C-20-08	189	3
C-20-09	110	5 3 6
C-20-10	37	9
C-20-13	210	8
C-20-14	213	12
C-20-15	37	8
C-20-19	107	8
C-20-20	82	13
C-20-24	85	7
C-20-25	64	9
C-20-11	37	11
C-21-16	113	4
C-21-17	49	9
C-21-21	79	15
C-21-22	134	6
C-21-23	15	4
C-28-05	46	12
C-29-01	43	12
C-29-02	207	12
C-29-03	98	15
C-29-04	43	
C-29-06	186	1 7
C-29-07	341	8

<sup>\*</sup> Areas where Supplemental Standards apply.

LOCATION (GRID NO.)	DEPTH (cm.)	CONCENTRATION (pCi/g)
C-29-08	238	3
C-29-09	162	7
C-29-10	88	2
* C-29-12	250	23
C-29-13	290	12
C-29-14	399	3
C-29-15	155	5
C-29-17	158	4
* C-29-18	198	43
C-29-19	219	3
C-29-20	85	7
C-29-23	37	9
C-29-24	79	6
C-29-25	107	5
C-30-11	60	2
C-30-16	73	9
C-30-17	15	16
C-30-21	43	2
C-30-22	73	5
C-30-23	18	1
C-37-04	49	3
C-37-05	64	1
C-37-09	73	7
C-37-10	21	9
C-37-15	31	3
C-38-01	40	2
C-38-02	61	2
C-38-03	61	3
C-38-06	37	3
C-38-07	46	1
C-38-08	64	3
C-38-09	15	2
C-38-11	40	2
C-38-12	58	8
C-38-13	67	
C-38-14	37	3
C-38-16	40	2
C-38-17	70	8
C-38-18	37	1
C-38-19	42	8 3 2 8 1 2
C-38-22	55	i

<sup>\*</sup> Areas where Supplemental Standards apply.

LOCATION (GRID NO.	) DEPTH (cm.)	CONCENTRATION (pCi/g)
C-38-23	24	1
C-38-24	37	4
C-38-25	15	2
C-46-02	122	12
C-46-03	34	2
C-46-04	31	
C-46-05	15	1 2
C-46-07	189	2
C-46-08	61	3
C-46-09	70	6
C-46-10	24	4
C-46-12	55	3
C-46-13	43	3
C-46-14	110	5
C-46-15	34	3
C-46-17	58	3
C-46-18	79	3
C-46-19	116	8
C-46-20	27	4
C-46-21	79	15
C-46-22	58	2
C-46-23	91	2
C-46-24	122	10
C-46-25	55	4
E-06-01	76	4
E-06-02	58	4
E-06-03	37	5
E-06-04	113	9
E-06-05	61	5
E-06-06	98	4
E-06-07	67	3
E-06-08	137	10
E-06-09	122	12
E-06-10	73	4
E-06-11	119	4
* E-06-12	94	22
E-06-13	131	3
E-06-14	128	5
E-06-15	49	6
E-06-16	168	4
* E-06-17	122	3 5 6 4 17

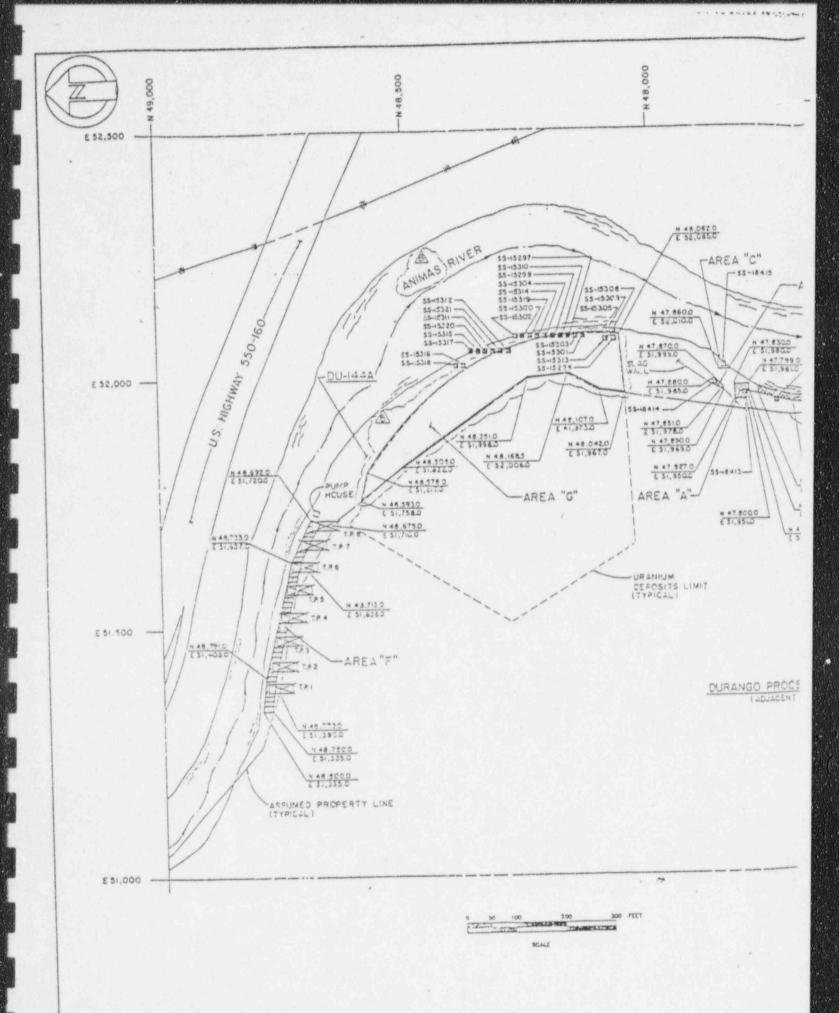
<sup>\*</sup> Areas where Supplemental Standards apply.

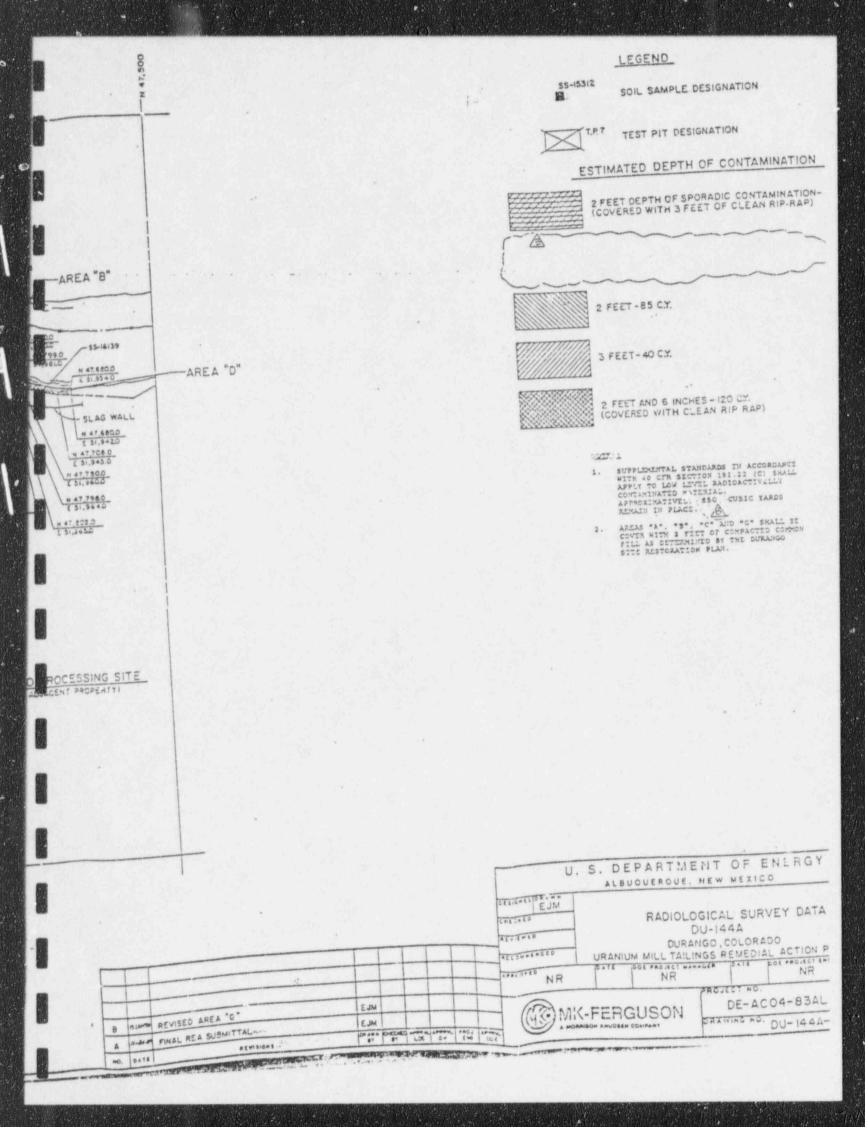
LOCATION (GRID NO.)	DEPTH (cm.)	CONCENTRATION (pCi/g)
E-06-18	125	8
E-06-19	101	8 7
E-06-20	55	14
E-06-21	226	
E-06-22	174	2 3 1 2 2 2 3 3 3 3 3 2
E-06-23	58	1
E-06-24	73	2
E-06-25	70	2
E-07-11	15	3
E-13-05	314	3
E-13-10	436	3
E-13-15	146	3
E-13-20	235	2
E-13-25	323	3
E-14-01	280	16
E-14-02	226	3
E-14-03	186	10
* E-14-04	58	22
E-14-05	15	3
E-14-06	192	7
E-14-07	238	
E-14-08	107	3 2 4
E-14-09	40	4
E-14-10	15	2
* E-14-11	104	17
E-14-12	247	4
E-14-13	85	9
E-14-14	61	9
E-14-16	143	9
XE-14-17	88	29 /
* E-14-18	61	114
* E-14-21	183	40
E-14-22	55	6

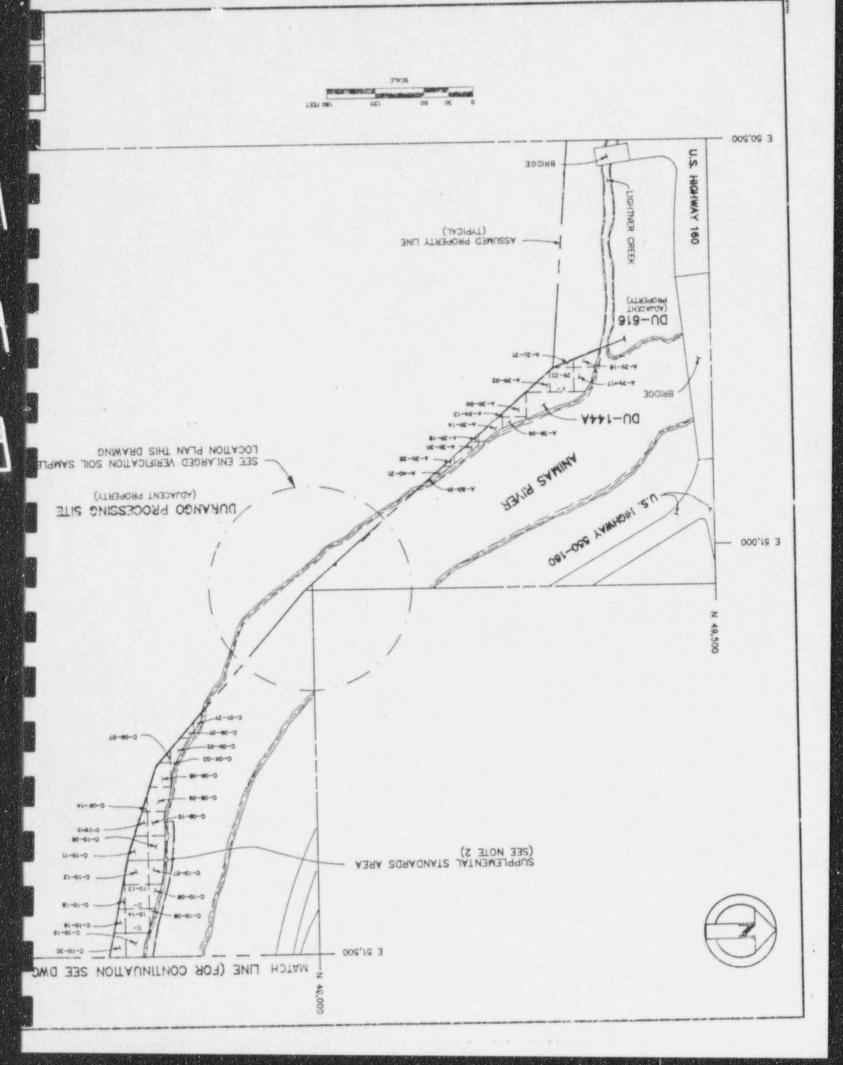
<sup>\*</sup> Areas where Supplemental Standards apply.

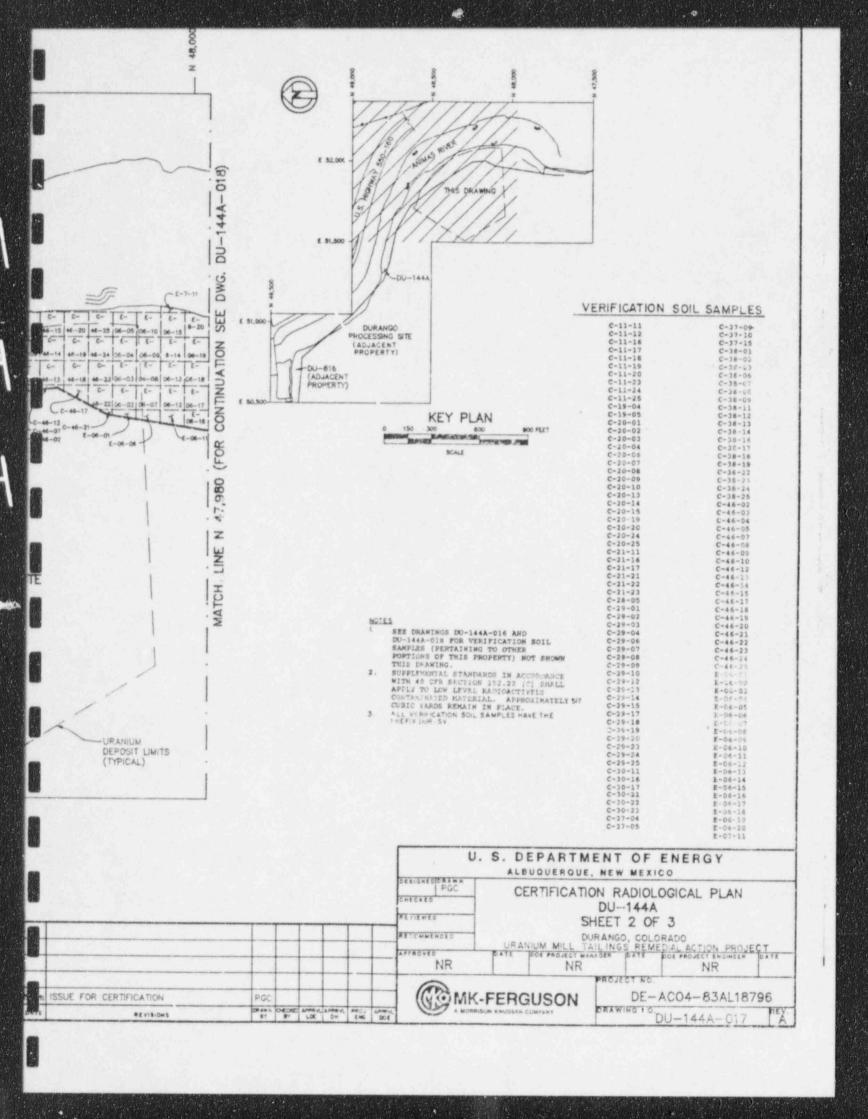
### 4.0 REFERENCES

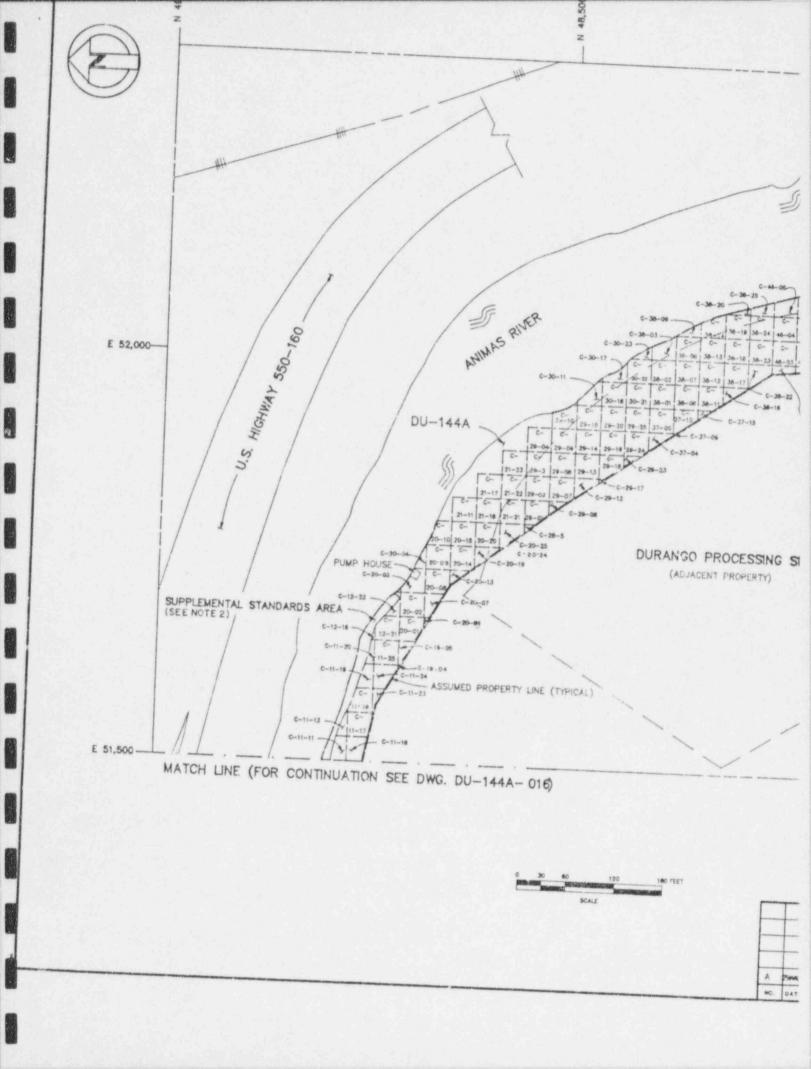
- 4.1 The Radiological and Engineering Assessment for Durango, Property DU-144A; MK-Ferguson Company/Chem-Nuclear Environmental Services, Inc.; Albuquerque, New Mexico; February 1, 1990.
- 4.2 Health Physics Procedures; Chem-Nuclear Environmental Services, Inc., for MK-Ferguson Company, Remedial Action Contractor; Albuquerque, New Mexico; June 1986.
- 4.3 Vicinity Properties Management and Implementation Manual; UMTRAP, U.S. Department of Energy; Albuquerque, New Mexico; August 1986.
- 4.4 Title 40, Code of Federal Regulations, Part 192.12-23; U.S. Environmental Protection Agency; Washington, D.C.; July 1983.

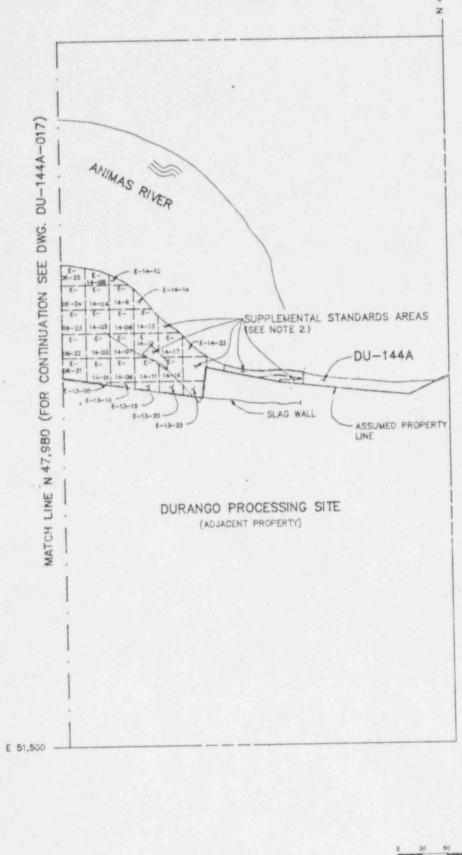






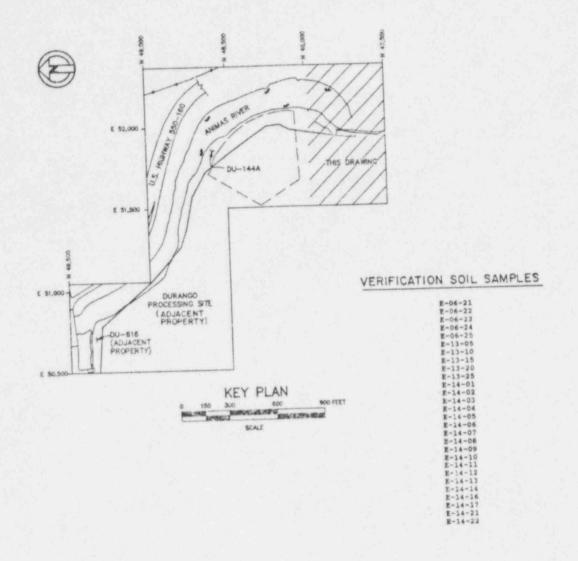




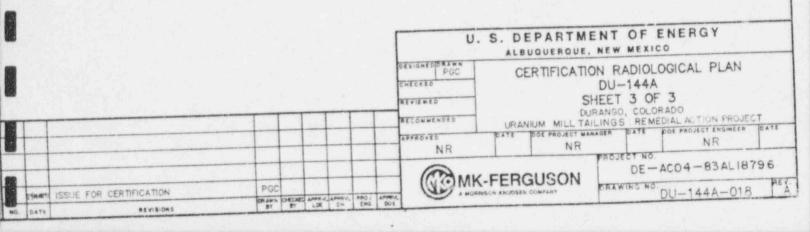


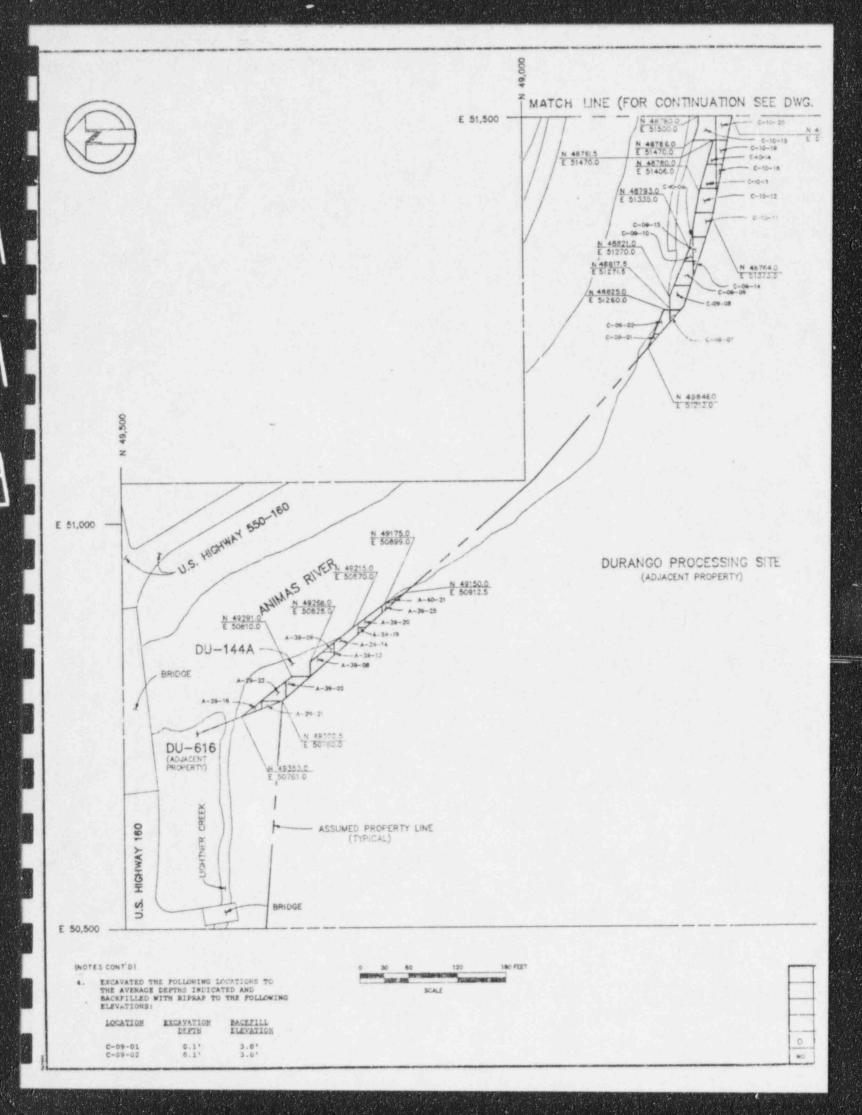


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- 1. SEE DRAWINGS DU-144A-016 AND DU-144A-017 FOR VERLYTEATION SOFT SAMPLES (PRETAINING TO OTHER PORTIONS OF THIS PROPERTY) NOT SHOWN THIS DRAWING.
- 2. SUPPLEMENTAL STANDARDS IN ACCORDANCE WITH 40 CFF SECTION 197.22 (C) SHALL APPLY TO LOW LEVEL BADIOACTIVELY CONTAMINATED MATERIAL. APPROXIMATELY 5.7 CUBIC YARDS REMAIN IN PLACE.
- 3. ALL VERIFICATION SOIL SAMPLES CONTAIN THE PREFIX DUR-SV.

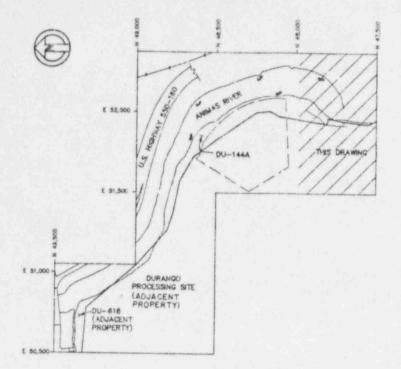




DU-144A-021) 738.0 ANNAS RIVER HICHWAY E 51,500 PROCESSING PROPERTY 616 TUS DRAWING (ADJACENT PROPERTY) KEY PLAN 900 FEET ENCAVATED THE FOLLOWING LOCATIONS TO THE LIMITS INDICATED TO THE FOLLOWING AVERAGE DEPTHS. BACKFILLED WITE COMPACTED COMMON FILL FOLLOWED BY A MINIMUM OF 6 INCHES OF TOPSOIL AS DIRECTED BY THE CONTRACTOR'S REPRESENTATIVE: GENERAL HOTES: THE LATEST REVISION OF THE FOLLOWING TECHNICAL SPECIFICATIONS APPLY TO THE REMEDIAL ACTION WORK REQUIRED FOR PROPERTY NO. DU-144A: SECTION 02110 CLEARING AND GRUBBING LOCATION EXCAVATION DEPTH BACKFILL SECTION 07130 A-29-16 A-29-21 A-29-22 A-39-02 A-39-09 A-39-13 A-39-14 A-39-19 A-39-20 A-36-25 A-40-21 A-50-01 CONTAMINATED MATERIAL 0.01 0.5 REMOVAL 0.4' 0.8' 1.5' 0.2' 0.3' 0.1' 0.3' 0.3' 0.3' 0.1' 0.3' 11.0' 11.0' SECTION 02200 EXCAVATION AND BACKFILL SECTION 02480 LANDSCAPING A-30-C1 C-09-07 C-09-08 C-09-10 C-09-10 C-09-15 C-10-16 C-10-11 C-10-12 C-10-13 C-10-14 C-10-15 C-10-18 C-10-19 C-10-19 C-10-20 MOTEST DU-144A-022 FOR EXCAVATION AND RESTORATION PLANS (FERTALFILL TO OTHER PORTIONS OF THIS PROPERTY) NOT SHOWN THIS DRAWING. TOPPED DISTURBED WON-RIPRAP LOCATIONS (SEE NOTE 4.) WITH NATIVE SEED, MULCH AND PERTILIZER. U. S. DEPARTMENT OF ENERGY ALBUQUERQUE, NEW MEXICO OFFICHED CACE EXCAVATION AND RESTORATION PLAN AS-BUILT DRAWING The Blue

BECOVERED

BECOVERED DU-144A SHEET 1 OF 3 DURANGO, COLORADO URANIUM MILL TAILINGS REMEDIAL ACTION PROJECT TOATE DOE PROJECT MANAGER TOATE DOE PROJECT ENGINEER NR APPROVED NR PROJECT NO. MK-FERGUSON DE-ACO4-83AL18796 PH PM ABO DECKE ANDRY APPRIX BY LOK DR DU-144A-020 and PGC MANY AS BUILT



KEY PLAN

150 300 600 900 FEET

N 47,849.0 E 51,995.0



ETAIL 1

### NOTES:

- 1. SEE DRAWING DU-144A-020 FOR GENERAL NOTES AND DRAWINGS DC-144A-022 AND DG-144A-021 FOR EXCAVATION AND RESTORATION PLANS (REPTAINING TO OTHER PORTIONS OF THIS PROPERTY) NOT SHOWN THIS DRAWING.
- 2. EXCAPATED THE FOLLOWING LOCATIONS TO THE LINITS INDICATED TO THE POLLOWING AVERAGE DEPTIES.

  BACKFILLED WITH COMPACTED COMMON FILL FOLLOWED BY A MINIMUM OF 6 INCRES OF TOPSOIL AS DIRECTED BY THE CONTRACTOR'S REPRESENTATIVE:

LOCATION	EXCAVATION DEPTH	BACKFILL
E-06-21	1.9'	7.41
E-06-22		5.77
B-06-23	2.61	1.9
E-06-24	2.51	2.4'
E-06-25	11.0	2.3'
E-13-05	1.1"	10.31
E-13-10	1.3'	14.31
E-13-15	0.61	
E-13-20	5.4	7.71
E-13-28	16.21	10.61
8-14-01	1.61	9.21
E-14-62	5.61	7.4"
E-14-03	6.91	6.11
E-14-04	0.6	4.4
E-14-05	0.21	0.5
E-14-06	2.21	6.37
E-14-07	5.3	2.21
E-14-08	0.91	3.51
E-14-09	0.31	2.21
E-14-11	4.71	3.4"
E-14-12	8.1'	8.11
E-14-13	0.51	2.81
E-14-16	2.31	4.71
E-14-17	4.8	2.91
E-14-22	0.2	1.8

3. TOPPED DISTURBED LOCATIONS WITH MATIVE SEED, MULCH AND PERTURZER

# AS-BUILT DRAWING DESIGNED POC CRECKED AST - APPROVED REVISIONS PGC PU BC BC AST - COLD APPROVED AST - C

DESIGNED DEAWN
PGC PGC

EXCAVATION AND RESTORATION PLAN
DU-144A
SHEET 3 OF 3

DURANGO, COLORADO
URANIUM MILL TAILINGS REMEDIAL ACTION PRO

DURANGO, COLORADO

URANIUM MILL TAILINGS REMEDIAL ACTION PROJECT

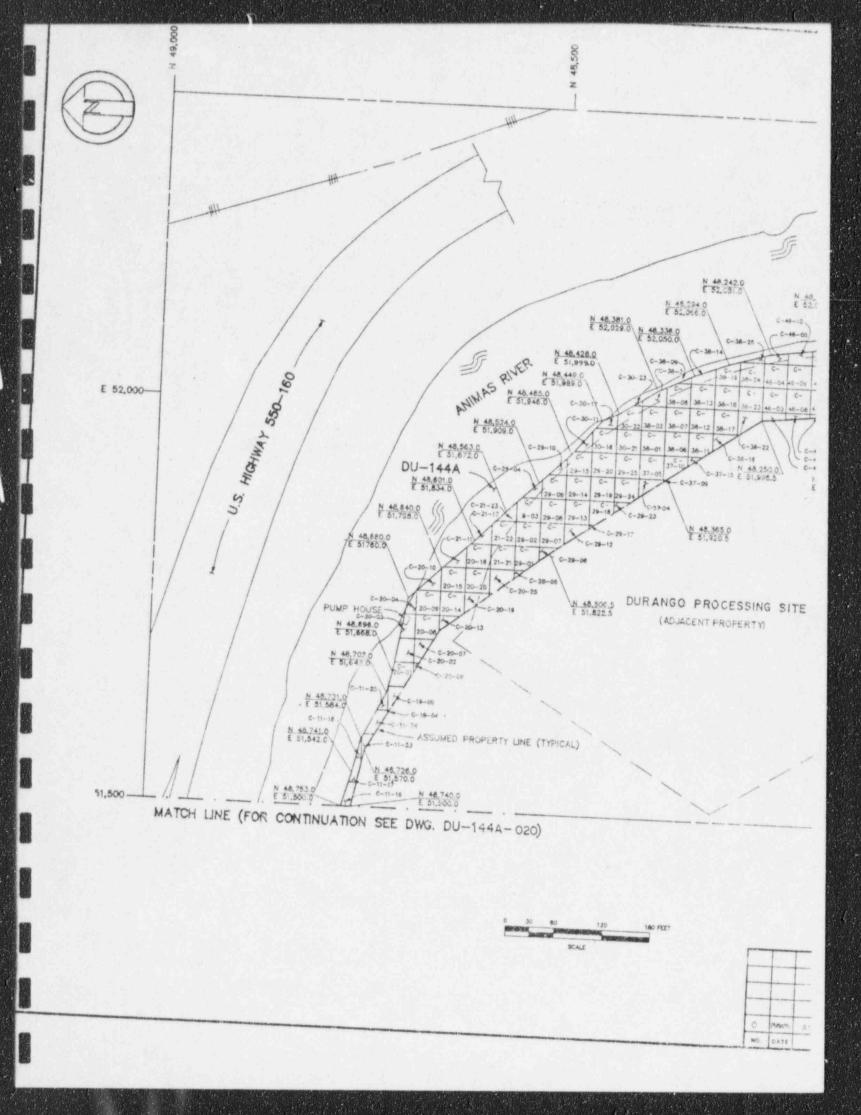
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DU-144A-022



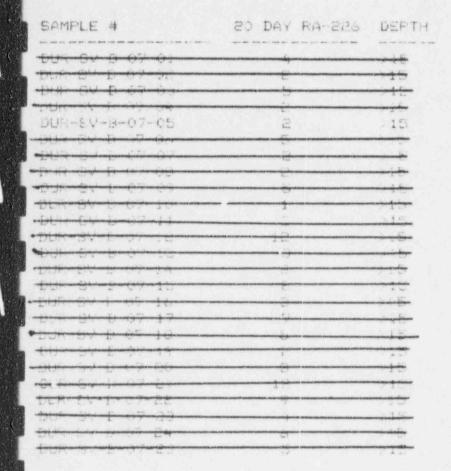
APPENDIX A
RADIOLOGICAL SURVEY DATA

SAMPLE #	20 DAY RA-226	DEPTH
- No. 100 - No. 1	and the control and the control and the control and the control and	
DUR-SV-A-29-16	2	>15
DUR-SV-A-29-17	1	>15
DUR-SV-A-29-21	6	>15
DUF-61-A-29-22	3	15

SAMPLE #	20 DAY RA-2	25 DEPTH
DUR-SV-A-39-01 DUR-SV-A-39-05 DUR-SV-A-38-64	5	715 715
DUR-SV-A-37-08 DUF-SV-A-37-09	6	>15 >15 >15
DUR-SV-A-39-13 DUR-SV-A-39-13 DUR-SV-A-39-14	3	>15 >15 >15
DUK-07-A-19-19 DUK-57-A-39-20	3 8	>15 ->15
TUI-87-9-39-65	3	245

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DUR-SV-C-09-01	6	>15
DUR-5V-C-09-02	3	>15
DUR-SV-C-09-03		>15
DUR-SV-C-09-07		>15
DUR-5V-C-09-08	2	>15
DUR-8V-0-09-09		4.15
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DUR-EV-C-11-17	2	>15
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DUR-89-0-11-29	43	>15
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DUR-5V-C-20-03	40.00	>15
DUR-SV-0-20-04	6	>15
DUR-SV-C-20-06	8	>15
DLR-5V-0-20-07	5	15
DUR-5V-U-20-03	3	>15
DUR-SV-C-20-09	1 1 1 1 6	>15
DUK-5V-0-20-10	9	>15
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DUR-SV-C-21-11	11	115
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DUR-SV-C-2:-22	6	>15
DJR-3V-0-21-28	4	>15

EAMPLE #	20 DAY	RA-226	DEPTH
DUR-SV-C-29-01	12		>15
DUR-SV-C-29-08	12		015
DUR-SV-C-29-03	15		>15
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DUR-8V-C-29-06	7		>15
DUR-9V-C-89-07	8		>15
DUR-6V-C-29-08	3		>15
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SAMPLE #	20 DAY FA-225	DEPTH
DUR-SV-C-38-01	2	>15
DUR-87-0-38-02	2	>15
DUF-SV-C-99-03	3	215
DUR-SV-C-38-C6	3	>15
DUR-57-C 38-07	1	15
DUR-SV-C 38-08	3	> 15
DUR-6V- 59-09	2	>15
DUR-5V-0-38-11	8	>15
DUR-5V-0-3E-12	0	315
LUR-SV-0-38-13	8	>15
DUR-91-08-14	3	>15
DUI30-30-15	2	>15
DUR-3V-C-38-17	8	>15
DUR-8V-C-30-18	1	>15
DUR-SV-0-08-19	2	>15.
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DUR-57-C-99-23		>15
DJR-5V-C-23-24	4	>15
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SAMPLE #	20 DAY RA-226	DEPTH
#WF 64 6 46 4		
DUR-SV-C-46-02	1/3	>15
DUR-5V-C-46-03	2	>15
DUR-8V-5-46-04	1	>13
DUR-EV-C-+6-05	2	>15
DJR-SV-C-45-05		>15
DUR-SV-0-40-07	2	>15
DUR-8V-0-46-08	3	> 15
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JUN-EV-0-46-13	3	546
DUM-E-1-6-46-14	5	15
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DUR-6V-C-46-17	9	>15
DUR-SV-C-46-18	3	215
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DUR-8V-C-46-20	4	>15
DUR-8V-C-46-21	5	715
DUN-EV-0-45 88		15
DUP-5V-0-46-23	23	15
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DUR-SV-C-46-25	4	15

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DUR-EV-E-06-01	4	>15
DUR-SV-E-06-02	4	>15
DUR-5V-E-06-03	5	>15
DJR-SV-E-05-04	9	>15
DUR-SV-E-06-05	5	>15
DLR-SV-E-08-06	- 4	>15
DUR-5V-E-06-07	3	>15
DUR-SV-E-06-08	10	>15
DUP-5V-E-06-09	12	>15
DUR-SV-E-06-10	4	15
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DUR-SV-E-06-14	5	0.15
DUR-8V-E-06-15	6	>15
DUR-SV-E-06-16	4	>15
DUR-SV-E-06-17	17	>15
DUI:-87-E-06-16	. 8	7 1015
DUR - GV-E-05-15	7	0.15
DUI:-SV-E-06-20	14	>15
DUR-60-E-08-21	2	>15
DUE -50-E-06-23	3	215
DLR-DV-E-CE-DS	1	>15
DUR-67-1-06-84	2	>15
DUR-5V-17-06-25	£	15

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Standard Report

Page 1

SAMPLE #	20 DAY RA-226	DEPTH
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DUR-SV-E-14-01	16	>15
DUR-SV-E-14-02	3	>15
DUR-SV-E-14-03	10	>15
DUR-SV-E-14-04	22	>15
DUR-SV-E-14-05	3	>15
DUR-SV-E-14-06	7	>15
DUR-SV-E-14-07	3	>15
DUR-SV-E-14-08	2	>15
DUR-SV-E-14-09	4	>15
DUR-SV-E-14-10	2	>15
DUR-SV-E-14-11	17	>15
DUR-SV-E-14-12	4	>15
DUR-SV-E-14-13	9	>15
DUR-SV-E-14-14	9	>15
DUR-SV-E-14-16	3	>15
DUR-SV-E-14-17	29	>15
DUR-SV-E-14-18	114	>15
DUR-SV-E-14-21	40	>15
DUR-SV-E-14-22	6	>15 00011
DUR-SV-E-14-18	114	

Vicinity Property No. DU-144A S

#### APPENDIX B

OWNERS/STATE, DOE AND NRC COMMENTS TO APPLICATION SUPPLEMENTAL STANDARDS

ENGINEERS AND CONSTRUCTORS



MEADQUARTERS OFFICE ONE ERIEVIEW PLAZA CLEVELAND OHIO U.S.A. 44114 PHONE (216) 523 5600 TELEX 985542

September 7, 1989

Alfred A. Shablo District Engineer Colorado Department of Highways 214 West 6th Street Durango, CO 81301

SUBJECT: Use of Supplemental Standards - 100-144

Dear Mr. Shablo:

In accordance with the Uranium Mill Tailings Radiation Control Act (UMTRA) of 1978, Public Law 95-604, the Department of Energy (DOE) included property (DU-144) for remedial action. Further evaluation of the contamination on your property has been performed and a recommendation has been proposed to leave the contaminated material and place 2' of soil and riprap over the area. This recommendation is proposed per the Code of Federal Regulations 40 CFR 192, Supplemental Standards. We are basing the recommendation on the criteria presented below. Your comments/concurrence are requested.

The Radiological and Engineering Assessment (REA) performed on the property (DU-144) has revealed that radioactive contaminated materials are present in two areas on your property; the Riprap Area and Uranium Lens Area (Figure 3.1). The contamination in the Riprap Area is presently covered with 3 feet of radiologically clean riprap. Contamination is sporadically distributed through the 2 foot layer of soil beneath the riprap. In the Uranium Lens Area, contamination is present in a 1 to 6 inch lens that is exposed at the high water mark on the bank of the Animas River. This lens possibly extend from the river back to the property line beneath 2 to 25 feet of radiologically clean overburden.

The overburden consists mainly of slag generated by a lead smelter that was operated from the 1880's to 1930. It has been tentatively proposed that 2 feet of backfill and riprap be placed over the exposed portions of the Uranium Lens along the river. The cover will be blended to match the existing topography.

REPLY TO MK FERGUSON COMPANY
REMEDIAL ACTIONS
CONTRACTOR UMTRA PROJECT
PO BOX 9136
ALBUQUERQUE NEW MEXICO U.S.A. 8719

Alfred A. Shablo September 7, 1989 Page 2

Because of the cost involved in cleaning up the material, coupled with the low health hazard, we are recommending that the contaminated material in these areas be left in place. This action is permitted under Title 40, Code of Federal Regulations, Section 192.21 and 22. The sections of the EPA Standards, which are established for the cleanup of Uranium mill tailings, allow residual radioactive materials to remain in place when certain conditions are met. The criteria defining when remedial action need not take place (Supplemental Standards) are as follows:

(1) The estimated cost of remedial action is unreasonably high relative to the long-term benefits, and the residual radioactive materials do not pose a clear present or future hazard.

After the proposed remedial action occurs and the Uranium Lens has been covered with 2' of backfill and riprap, general area radiation levels will range from 14 to 25 micro R/hr. Background for the Durango area is 14 micro R/hr. If a person spent 8 hours a day, 5 days a week, for 50 weeks in a 25 micro R/hr radiation field, he would receive about 50 millirem of gamma exposure in one year. This is one-tenth the amount allowed the general public (10 CFR 20.105). The actual amount of contaminated material that will remain in place after remedial action is approximately 940 cubic yards.

In compliance with the EPA regulations found in the Code of Federal Regulations 40 192.21, we solicit your comments concerning this action. We are attaching a copy of the applicable sections of the Code of Federal Regulations for your convenience in responding to this proposed action. To comply with EPA regulations, we must receive a written response with your concurrence/comments. We request your response by September 18, 1989.

If you have any questions or need additional information concerning this matter, please call either Dave Charlton of my staff at 1-800-443-4379, or Ms. Jolene Garcia of the U.S. Department of Energy at (505) 846-1238.

Sincerely,

MK-Farguson Company

J/G. Oldham Project Director

JGO/RAP/RDJ/mno

Enclosures

cc: w/o enclosures:

J. Garcia, DOE/UMTRA C. Moore, TAV/UMTRA

Document Control

# STATE OF COLORADO

DEPARTMENT OF HIGHW - YS District V Maintenance Section 33

214 W. 6th Street Durango, Colorado 81301 (303) 259-0021

October 3, 1989



A. A. Shablo District Engines

Mr. J. G. Oldham, Project Director MK-Ferguson Company P.O. Box 9136 Albuquerque, New Mexico 87119

Dear Mr. Oldham:

MK-FERGUSON CO.
ALBUQUERQUE

OCT 05 1989

RECEIVED

I gave verbal approval to your plan of leaving the contamination in place on our property to Mr. Ron Jacobs by telephone today. This letter will confirm our approval to go ahead with your plans.

If we can be of further assistance, please feel free to contact us.

Sincerely.

Jon T. Vickers

Maintenance Superintendent

JTV:mh

cc: Shablo Watson File

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# STATE OF COLORADO

#### COLORADO DEPARTMENT OF HEALTH

4210 East 11th Avenue Denver, Colorado 80220 Phone (303) 320-8333

November 1, 1989

ATTHER CONTROL CO.

h 201 - 5 680

CEVED:



Ray Romer Covernor

Thomas M. Vermon, M.I. Executive Director

J. G. Oldham MK-Ferguson Company P.O. Box 9136 Albuquerque, New Mexico 87119

Re: State Concurrence on Durango Processing Site Draft REA for DUR-144, File No. DUR-XIII.N

Dear Mr. Oldham:

On October 10, we received from your staff a Draft Radiological and Engineering Assessment (REA) for Vicinity Property No. Dur 144. The State herein provides concurrence on this document.

The Vicinity Property Dur 144 includes a strip of land located between the processing site to the south and the Animas River to the north. Approximately 940 cubic yards of contaminated material have been identified along this strip in areas beneath either 2 to 20 foot thick slag piles or 3 foot thick riprap. The REA states that the decontamination of these areas would require removal of the overlying slag and riprap piles at great expense as compared to the long-term health benefits.

The recommended option involves backfilling the contaminated exposed area beneath the slag pile with two feet of backfill material and riprap. No action is recommended in the riprap area. It is stated that health risks associated with exposure to these contaminated areas after the recommended remediation will be minimal.

We concur that supplemental standards should appropriately be applied to this area, and that the recommended options will satisfactorily protect the public health and environment.

J. G. Oldham November 1, 1789 Page 2

If you have any questions, please contact Patricia Martinek at (303) 331-4828.

sincerely,

Edward L. Bischoff/ UMTRA Program Manager

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

cc: B. Franz, CDH

M. Matthews, DOE

J. Garcia, DOE

M. Thomson, MK-F

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# STATE OF COL

#### COLORADO DEPARTMENT OF HEALTH

4210 East 11th Avenue Denver, Colorado 80220-3716 Phone (303) 320-8333 Telefax: (303) 322-9076 (Main Building/Denver) (303) 320-1529 (Ptarmigan Place/Denver) (303) 248-7198 (Grand Junction Regional Office)



Roy Romer Covernor

Thomas M. Vernon, M.D. Executive Director

MK-FERGUSON CO. ALBUQUERQUE

December 28, 1989

J. G. Oldham MK-Ferguson Company P.O. Box 9136 Albuquerque, New Mexico 87119

RECEIVED

AN 08 1990

State Concurrence on Durango Processing Site Final REA for DU-144A, File DUR-XIII.N

Dear Mr. Oldham:

We are pleased to provide State concurrence on the Final REA for DU-144A.

On November 1, 1989, we provided State concurrence on the draft REA for DU-144. The final REA is substantitively similar to the draft REA. Therefore, our comments have not changed.

We concur that supplemental standards should be applied to this area, and that the recommended options will satisfactorily protect the public health and environment.

If you have any questions, please contact Patricia Martinek at (303) 331-4828.

Sincerely,

Edward L. Bischoff UMTRA Program Manager

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

cc: B. Franz, CDH

M. Matthews, DOE

J. Garcia, DOE

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- Rob P.

# RADIOLOGICAL AND ENGINEERING ASSESSMENT (REA) Review Form

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#### RADIOLOGICAL AND ENGINEERING ASSESSMENT (REA) Review Form

Date Received: 1/25/90 (Revised) DOE Location No. DU-144A

Date due DOE:

[K] RECOMMEND APPROVAL AS NOTED BELOW

[ ] DO NOT RECOMMEND APPROVAL AS NOTED BELOW

REVIEWED BY: Itherty Much DATE: 1/29/90

REVIEWED BY: DATE: 1/29/90

VP MANAGER: Carry Nove DATE: 2/1/90

PAGE	COMMENT
2	In "Estimated Extent of Contamination" section, the following should be added to the end of the first paragraph: "However, the deposit in Area G does not exceed the EPA standards or NRC guidelines, as discussed in Appendix D."
2	In "Option I" section, it should be stated that areas D and F are presently covered with 2 feet of riprap.
2	In "Option Il" seciton, the depths should be specified as estimated.
2	In "Option II" section, the excavation depth in Area D is inconsistent with drawing DU-144A-015, which indicates a depth of 2½ feet. (Also on page 3.)
5	Estimated volume of material to remain should be 845 cy.
17	Is this the cost for common fill and riprap?
18	Item 1.1 should state "Z-Pile" not "2-Pile." Item 2.1 should indicate a quantity of 85 cy and Item 2.5 should indicate a quantity of 40 cy (per Drawing DUR-144A-015). Item 2.5 should indicate Area B.
App. C	The most recent letter from CDH should be included.



#### REVIEW COMMENTS

UMTRA Project No. DE-ACO4 83AL 18796

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20	In.	Na		-
211	le:	1.815	8133	е.

Durango

Document Reviewed

Site No. DU-144A

Radiological and Engineering Assessment (REA)

Date February	6,	1990
1		1
Page	_ (	of

Reference Drwg. No., Spec. Sec., Etc.)	I Davidson I		Resolution
Page 2	TAC	In "Estimated Extent of Contamination" section, the following should be added to the end of the first paragraph: "However, the deposit of Area G does not exceed the EPA standards or NRC guidelines, as discussed in Appendix D."	Agreed, REA revised.
Page 2	TAC	In "Option I" section, it should be stated that Areas D and F are presently covered with 2 feet of riprap.	Agreed, REA revised.
Page 2	TAC	In "Option II" section, the depths should be specified as estimated.	Agreed, REA revised.
Page 2	TAC	In "Option II" section, the excavation depth in Area D is inconsistent with drawing DU-144A-015, which indicated a depth of 2.5 feet. (Also on page 3)	REA revised to indicate an estimated depth of 2.5 feet in Area D.
Page 5	TAC	Estimated volume of material to remain should be 845 cy.	Agreed, REA revised.
Page 17	TAC	Is this the cost for common fill and riprap?	The cost for riprap will be added to the table.
Page 18	TAC	Item 1.1 should state "Z-Pile" not "Z-Pile."  Item 2.1 should indicate a quantity of 85 cy and  Item 2.5 should indicate a quantity of 40 cy  (per Drawing DU-144A-015). Item 2.5 should  indicate Area B.	Agreed, REA revised.
Appendix C 2786F	TAC	The most recent letter from CDH should be included.	See Appendix C.

NRC/UMT/0490-0024

UNITED STATES

DU-144A

FILE

#### NUCLEAR REGULATORY COMMISSION

REGION IV

URANIUM RECOVERY FIELD OFFICE BOX 25325 DENVER, COLORADO 80225

APR 1 2 1990

URFO: PWM Docket No. 40-WM039 040WM039480F

MK-FERGUSON CO. ALDUQUERQUE

APR 2 4 1990

RECEIVED

Mark L. Matthews, Project Manager Uranium Mill Tailings Project Office U. S. Department of Energy P. O. Box 5400 Albuquerque, New Mexico 87115

Dear Mr. Matthews:

The NRC has completed a review of the Radiological and Engineering Assessment (REA) for vicinity property number DU-144A located in Durango, Colorado.

Based upon our review, we conclude that the criteria for applying supplemental standards contained in 40 CFR 192.21(c) have been met. The proposed remedial action of covering the exposed areas with 2 feet of backfill and riprap is reasonable under the circumstances and meets the requirements of 40 CFR 192.22(a). The Site Restoration Plan, which is yet to be submitted, will be required to include provisions to place the cover material as proposed.

We therefore concur with the application of supplemental standards as proposed in the REA for vicinity property DU-144A. Should you have any questions, please contact Paul Michaud of my staff at FTS 776-2805.

Sincerely.

Ramon E. Hall

Director

Case Closed: 040WM039480E

REP	INFO	DIST	REP	INFO	DIST
	V	100			PDC
	1	JEH			MWH
	1	WAZ	-602.1	-	EAP" 8
	6	REC			MEP
_		CDW			FJF/MKE
1		JOH			GG/PD
1		סננ			JEJ
_	1	TOM			TRS
1		JOP			DEW
1		D23			IWS
1		SJS/DC			TGS
-					RSW
	- 1	- 1	1		-

Vicinity Property No. DU-144A S

APPENDIX C
LEGAL DESCRIPTION

#### LEGAL DESCRIPTION

The property which is the subject of this Completion Report, the address of which is Truck By-Pass, Camino del Rio, Durango, Colorado, is more particularly described in the County Recorder's Office, as follows:

DU-144 has been divided into two portions, two simplify the application for Supplemental Standards to one portion of the property. This property is Highway 550/160 right of way. A portion of the property on the east side of the highway was previously remediated. The part of the property of concern is the highway right of way on the west side of the highway. More specifically, the highway right of way on the west side of the Animas River adjacent to the Durango UMTRA Processing Site.

## ATTACHMENT B

## VICINITY PROPERTY CERTIFICATION SUMMARY AND DECISION

VP NO. DU-144AS

The data presented in the certification folder indicate:	E	TAC valuation	on	E	DOE valuation	on
<ol> <li>The Ra-226 concentration in the top         15 cm of soil averages ≤5 pCi/g above         background over 100 sq m, in-situ [ ]         lab [X].     </li> </ol>	Yes	No []	N/A []	Yes [ ]	No [ ]	N/A [ ]
2. The Ra-226 concentration in any 15 cm of soil below the top 15 cm surface layer averages ≤15 pCi/g above background over 100 sq m, in-situ [ ] lab [X].	[]	M	[ ]	[ ]	i 1	[]
			nostr	uctures		
<ol> <li>The indoor gamma readings are</li> <li>uR/h above background in every habitable room.</li> </ol>	[]	11	IXI	[]	[ ]	11
in any habitable room is <0.02 working	11	[]	(×)	[]	1.1	1.1
levels, or at most 0.03 WL.			els excee material	ed 0.03 W	L due t	to non-
5. Supplemental standards were applied in accordance with EPA standards 40 CFR Part 192.21.	M	[]	11	11	1 1	1.1
TAC Recommendation: [ ] Certification, [X] [ ] Holding pending long-term RDC results (dimeasurements per the TAC/RAC consensus for Comments: 67.2 # E-14-17 should be	etector orm, [	s previo	ously insta	illed), [ ] ge 2 / Stag	Reque ge 3).	st additional
Mach Apille 6/17/9,	1	0	onf.	a for	26	17/91
Radiological Services Manager / Date			/icinity Pr	operty Ma	nager	/ Date
DOE Decision: [ ] Certification, [ Y Certifica						
[ ] Hold pending long-term RDC results, [ ] as noted below, [ ] Close Out (Stage 2/Stage		auditi	onai mea:	our ernernt	5 65	
Comments:	D	acti	n B.	4al	ance	06-17- or/Date
			DOE Cen	ification E	Evaluat	or/Date
NRC Concurrence Dated:	100 Marie 1					

# CERTIFICATION REVIEW SUMMARY

Property No.: Du - 144 A S Reviewed by: R. Conway Date: 6/12/91
Address: Truck By-Puss Approved by: Allo h Auly Date: 6/17/9/  (Cumino Del Rio)  Nurango, CO 8130/  Mark Miller  Manager, Radiological Services
Property Category: Open Louis Jacobs-Weston Team
Quantity of soil removed: N/A (yd3) This property was remediated in anywhetion with the processing site.
The recommendation for certification is based on a review of the Completion Report and other available data describing remedial actions and resulting radiological conditions at this property. Measurement methods and data are compared to the requirements provided in the Vicinity Properties Management and Implementation Manual, and in 40 CFR 192. The following recommendations are made according to the intent of those requirements:
1.0 CERTIFICATION
This property complies with the EPA standards and is recommended for Certification.
<ul> <li>This property is recommended for Certification only after the conditions listed in 3.0, below, are met.</li> </ul>
- Remedial actions were refused by the property owner, and the property cannot be Certified.
2.0 SUPPLEMENTAL STANDARDS
- Supplemental Standards were not applied at this property.
- Supplemental Standards were applied as described in the Completion Report.
- The following agencies concurred in the application of Supplemental Standards at this property.
3.0 CONDITIONS NRC
- Annual average RDC results are required.
- The following additional measurements are required:
- The following additional actions must be completed:

		COM	<b>IPLIA</b>	NCE*		
CE	RTIFICATION REQUIREMENT	Yes	No	N/A	COMMENTS (Reference Page in Completion Report)	
ı.	SOIL EXCAVATION  1. Were soil samples collected/analyzed? (List quantity of surface and subsurface samples.)	1			198 sail sampler all tablem at 215cm depths	
	Did grid intervals equal 10 meters or less?  (List grid size and quantity sampled.)	J			198 verfædim gride men sangele	
	Were adequate spatial averaging techniques clearly demonstrated?	1			Nat required for verification.	
	Was an outdoor gamma survey conducted?  (List results.)			1		
	<ol> <li>Were alternate measurements performed? (List types of measurements, range, and average of results.)</li> </ol>			1		
	6. Were all contaminated areas sampled after excavation?	J			Fine over of contomunation.  A, B, C, D + F	

<sup>\*</sup> If no or N/A, then an explanation is required.

		CON	MPLIA	NCE*		
CERTIFICATION REQUIREMENT		Yes	No	N/A	COMMENTS (Reference Page in Completion Report)	
	7. Were soil concentrations of Ra-226, averaged over 100 square meters, less than or equal to:  o 5 pCi/g plus background (surface)? o 15 pCi/g plus background (subsurface)?		1		Of the 198 grade sampled all were than 15 p C:/8 except element of each where supplemental stoud are being applied.  BKG=1.5 p C:/8.	
	If excavation was done around structures or utility conduits to structures, was contamination removed to meet EPA Standards?			J		
	Were assessment measurements taken in the lowest habitable level of every habitable building?		The second secon	- Comment	open land - no structurer	
	Were small rooms scanned and large rooms (2000 ft <sup>2</sup> ) gridded at intervals of 10 feet or smaller?			1		
	Were verification measurements taken at locations of prior maximum readings?			1		

<sup>\*</sup> If no or N/A, then an explanation is required.

# VICINITY PROPERTY CERTIFICATION REVIEW FOR COMPLIANCE WITH RADIOLOGICAL STANDARDS (continued)

		COA	APLIA	NCE*	
CERTIFICATION REQUIREMENT		Yes	No N/A		COMMENTS (Reference Page in Completion Report)
	INDCOR GAMMA SURVEY (continued)  4. Were instrument readings converted to indicate microR/hr? (List range of readings.)				
	5. After remedial action, was the average value for each room or 2000 ft <sup>2</sup> area less than 20 microR/hr above background?				
	6. If any reading exceeded 20 microR/hr above background, was it satisfactily investigated to ensure no tailings involvement?				
111.	INDOOR RDC MEASUREMENTS  1. If RDC measurements were performed before remedial action, and results were above standards, were they repeated after remedial action was complete?				mo Structurer
	If RDC measurements were not performed before remedial action, were they taken in every habitable structure after remedial action?				

<sup>\*</sup> If no or N/A, then an explanation is required.

# VICINITY PROPERTY CERTIFICATION REVIEW FOR COMPLIANCE WITH RADIOLOGICAL STANDARDS (continued)

		CON	APLIA	NCE"	
CERTIFICATION REQUIREMENT		Yes No		N/A	COMMENTS (Reference Page in Completion Report
111.	INDOOR RDC MEASUREMENTS (continued)  3. If tailings were excavated within 10 ft of the structure or around utility conduits into the structure, were RDC measurements performed after remedial action?				
	If grab samples were used for verification,     were acceptable procedures used?			V	
	<ol> <li>Were grab sample results less than 0.01</li> <li>WL? (List range and average of results.)</li> </ol>				
	If annual average measurements were used for verification, were acceptable procedures followed?				
	<ol> <li>Were annual average RDC results less than EPA WL standards? (List range and average of results.)</li> </ol>				
	8. If annual average RDC results were between 0.02 WL and 0.03 WL, was appropriate justification given?				

<sup>\*</sup> If no or N/A, then an explanation is required.

CERTIFICATION REQUIREMENT		CO	APLIA	NCE"	
		Yes	No	N/A	COMMENTS (Reference Page in Completion Report)
V.	OTHER VERIFICATION MEASUREMENTS			1	Adequate data in present.
	If adequate verification data are not presented, were additional measurements taken?				
	Were acceptable procedures used?			V	
	Were surface alpha contamination levels less than:			1	
	o 20 dpm/100 sq cm for removable alpha activity?				
	o 100 dpm/100 sq cm for total alpha activity?			V	
	Was Ra-226 the only radionuclide of concern at this property?			1	
	<ol> <li>Were additional measurements performed?</li> <li>(List type and results.)</li> </ol>			1	

<sup>\*</sup> If no or N/A, then an explanation is required.

		CON	MPLIA	NCE*	
CERTIFICATION REQUIREMENT		Yes	No	N/A	COMMENTS (Reference Page in Completion Report)
V.	SUPPLEMENTAL STANDARDS		/		Supplemental standards were applied to deven unfecation
	If numerical standards were not met, is     this due to the presence of natural     radioactivity? What data show this?		7		supplemental standards were applied to deman unfecation of stated in the completion Report.
	<ol> <li>If all residual radioactive material at the property was not cleaned up, were supplemental standards (40 CFR 192 Subpart C) applied?</li> </ol>				Continuinated once to remain = 1150 sy.  Value of continuented staterial : 845 cy  Exposers sale sauge : 14 to 15 or/hr.  BKG- 14 UR/hr.
	3. Was the application of supplemental standards in accordance with the Plan for Implementing EPA Standards?				<ul> <li>[] a. Risk injury to workers/public</li> <li>[] b. Environmental harm</li> <li>M c. High cost relative to long-term benefits</li> <li>[] d. High cost of cleaning up building relative to benefits</li> <li>[] e. No known remedial action</li> <li>[] f. Radionuclides other than Ra-226 exist</li> </ul>
	Did appropriate state and Federal agencies concur in this application of Supplemental Standards? (Note: final NRC concurrence of the Completion Report is obtained following the DOE certification decision.)		CONTRACTOR OF THE PROPERTY OF		The application of Supplemental Standards appears in the REA.   The application of Supplemental Standards does not appear in the REA. Supplemental Standards were applied in the field.
					State concurrence dated 1/8/90 NRC concurrence dated 1/8/90

<sup>\*</sup> If no or N/A, then an explanation is required.

## VICINITY PROPERTY CERTIFICATION REVIEW FOR COMPLIANCE WITH RADIOLOGICAL STANDARDS (continued)

	CON	PLIA	NCE*		
CERTIFICATION REQUIREMENT		Yes	No	N/A	COMMENTS (Reference Page in Completion Report)
VI. SITE AUDIT REPOR  1. If a site audit was property, were the				J	
	s efforts were evaluated es, were the results				
VII. ADDITIONAL CONS 1. Are there any ad- considerations?	IDERATIONS  Iditional comments or	1			Grid number 12-14-17 should be marked for application of supplemental standards.
	ecommended for neeting the EPA standards pactive material?				

<sup>\*</sup> If no or N/A, then an explanation is required.