UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
URANIUM RECOVERY FIELD OFFICE
BOX 25325
DENVER, COLORADO 80225

OCT 29 1992

Docket No. WM-64
WM-73

U.S. Department of Energy
Albuquerque Operations Office
ATTN: Albert R. Chernoff
Project Manager
P.O. Box 5400
Albuquerque, New Mexico 87115

Dear Mr. Chernoff:

In our review of the certification data for the uranium mill tailings site at Lakeview, Oregon, we have identified several requirements that have not been addressed in the Final Completion Report. Please respond to the enclosed comments and provide appropriate revisions to the Final Completion Report so that we may complete our review.

Although DOE did not provide placement volume data, NRC accepts your certification that testing was done proportionally throughout the remedial action. Though accepted for this project, you should provide the necessary construction data in future completion reports and not presume acceptance based on certification.

Several of the issues raised in our review of the Lakeview Final Completion Report appear to be generic in nature since similar issues were identified in our review of the Tuba City Draft Completion Report. We therefore request that you include volume placement data summaries when you provide the Tuba City Final Completion Report for our review. In addition, please review the Draft Completion Report for Durango and revise as necessary. We will suspend our review of the Durango Draft Completion Report until you have completed any necessary revisions.

If you nave any questions, please contact the NRC Lakeview project manager, Ray Gonzales, at FTS (303) 231-5808.

Sincerely,

for Ramon E. Hall
Director

Enclosure:
As stated

OFFICIAL DOCKET COPY

9802030005 921029
PDR WASTE
WM-73 PDR

cc:
S. Hamp, DOE
P. Mann, DOE
R. Edge, DOE
F. Miera, Oregon
D. Stewart-Smith, Oregon

Casework Nos. 040WM064920E
040WM048050R
040WM073200E

bcc:
Docket File WM-64
Docket File WM-48
Docket File WM-73
PDR/DCS
URFO r/f
LJCallan, RIV
LLUR Branch, LLWM, 5E2
ROGonzales
DLJacoby
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PM:URFO*	PM:URFO	DD:URFO	D:URFO:RIV	
ROGonzales/lv	DLJacoby	EFHawkins	REHall	
10/22/92	10/27/92	10/28/92	10/28/92	

*Previously concurred

LAKEVIEW, OREGON

REVIEW COMMENTS ON THE
FINAL COMPLETION

The following requirements were described in the RAP, RAP addendums, PIDs, or in the RAIP but do not appear to have been addressed in the Final Completion Report. Please revise the Final Completion Report (FCR) as appropriate.

1. Design Specification 02200-2.1.C.2.a requires that Radon Barrier Materials be uncontaminated soil whose projected Ra-226 content not exceed 5.0 pCi/gm. This requirement has not been addressed in the FCR.

2. Design Specification 02200-2.1.C.3 requires that Geochemical Flow Barrier materials be select, natural, uncontaminated materials similar to the Radon Barrier. Therefore comment I-1 also applies to the Geochemical Flow Barrier.

3. Design Specification 02200-3.5.B requires that the top 6 inches of the subgrade of each permanent drainage ditch be compacted to a minimum of 95 percent of maximum density. This requirement has not been addressed in the FCR.

4. Procedure 6.2.1 of the RAIP, Rev. 3, requires, in part, that a minimum of 1 gradation/classification test per week be performed on Radon Barrier material, when an appreciable amount of material is placed. The same requirement is specified for the Geochemical Flow Barrier. In Section 4, Volume 3, Appendix E, of the FCR, DOE states that a minimum of one test per day was performed whenever more than 150 yd^3 of Radon Barrier material were placed. The same statement is made for the Geochemical Flow Barrier in Section 2, Volume 3, Appendix E, of the FCR. NRC agrees that this testing frequency meets the requirement. However, it appears that there may be a typographical error here. Was one test per day performed as stated in the FCR or was one test per week performed?

5. Design Specifications 02200-1.4.C and 02200-3.4.B.5 require that Type 1 materials be placed in the upper portions of the Disposal Cell. This requirement has not been addressed in the FCR.

6. Design Specifications 02200-1.4.D and 02200-3.4.B.5 require that Type 2 materials be placed in the lower portions of the Disposal Cell. This requirement has not been addressed in the FCR.

7. Design Specification 02200-3.4.B.6 requires that Vicinity Property materials be placed in the Encapsulation Cell. This requirement has not been addressed in the FCR.

8. In Section 4, Volume 3, Appendix E, of the FCR, DOE states that there were 28 passing gradation and classification tests performed on Radon Barrier material. DOE provided a summary table showing the results of gradation, classification and PI tests in a submittal dated July 17, 1992. As the table has 32 entries we assume that some of the samples were re-tests. The following comments concern the summary table.

   a) Were tests G-RB-04 and G-RB-04-R1 performed on the same soil? If yes, then why did one sample have a ML classification while the other had a MH classification? Also, if the soil was the same, why did one sample have a PI of 3 while the other had a PI of 11. If the tests were not run on the same soil, then there were more that 28 samples tested.

   b) Were tests G-RB-015A and G-RB-015B performed on the same soil? If yes, then why did one sample have a ML classification while the other had a MH classification? If the tests were not run on the same soil, then there were more that 28 samples tested.

   c) Were tests G-RB-016, G-RB-016-R1, and G-RB-016-R2 performed on the same soil? If yes, then why was the minus 200 fraction almost twice as much for test G-RB-016-R2 as it was for test G-RB-016? Also, if the soil was the same, why did one sample have a PI of 10 while the others had PIs of 0? If the tests were not run on the same soil, then there were more that 28 samples tested.

9. Design Specifications 02200-3.5.B and 02200-3.5.C, PID No. 13-S-09, require that subgrade areas be compacted to 95 percent of maximum dry density. In order to determine the appropriate maximum dry density value, laboratory compaction tests are required. Please discuss the testing frequency that was used for performing laboratory compaction tests or identify the section in the RAIP or other documentation where the laboratory compaction test frequency is described.

10. PID No. 03-S-29 proposed to substitute B-2 bedding for the apron, key trench, and ditch. However, As-Built Drawing LKV-DS-1321 indicates that B-1 bedding was used as was originally proposed. Please clarify and revise the Final Completion Report if necessary.