



U.S. Department of Energy

Grand Junction Office
2597 B 3/4 Road
Grand Junction, CO 81503

NOV 14 1997

Mr. Joseph H. Holonich, Chief
High-Level Waste and Uranium Recovery Projects Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
Mail Stop T7J9
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Approval of Remedial Action Design Package Utilizing Supplemental Standards
for River Road Dike (391 West Ave.) Grand Junction, Colorado

Dear Mr. Holonich:

Enclosed are two copies of the Radiologic and Engineering Assessment (REA) for the following location:

GJ-44607-CC 391 West Avenue

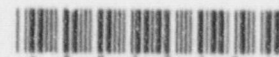
The REA has been reviewed and approved by the Department of Energy (DOE) and is being forwarded to the Nuclear Regulatory Commission for their review and approval. The engineering assessment proposes utilization of EPA supplemental standards for approximately 1,200 cubic yards of residual radioactive material (RRM) in a riparian area adjacent to the Colorado River and which extends beneath an existing flood control dike. The RRM deposit is estimated to vary between 18 and 24 inches thick at a depth ranging from 30 to 66 inches.

This property is a vacant lot situated between River Road and the Colorado River. A flood control dike runs the length of the property. The dike is built of soil, gravel, and rubble fill. The portion of the property on the river side of the dike contains exposed rubble and debris, and is heavily vegetated with tamarisk and other natural vegetation. The area below the dike lies within the 100-year flood plain and contains wetlands. This property was purchased by the City of Grand Junction for possible future expansion of the Riverfront Trail System. The surrounding area is used for commercial and industrial purposes. No other land use can be envisioned for the site due to the presence of wetlands and the dike. The area is periodically flooded by the Colorado River.

The DOE has evaluated three possible remedial action alternatives and the associated health risks, and has determined that no remediation is the best alternative. The Health Risk Analysis suggests that there are no identifiable significant health risks if supplemental standards are applied.

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This proposed course of action has been discussed with Jim Hams, Colorado Department of Public Health and Environment, Grand Junction Office and the property owner, the City of Grand Junction. Comments were solicited from the city. They object to the use of supplemental standards and desire that DOE remove all RRM. The City intends to develop the property as part of the Riverfront Trail System. City representatives stated that the development plans for this property were not firm, but that the City might reapply for construction of a U. S. Army Corps of Engineers (COE) flood control levee across this property. The City expects that the COE will require that all RRM be removed from within the foot-print of the levee.

Construction of the levee would probably require realignment of River Road and a sewer interceptor, and acquisition of private land for a new right-of-way. The City's 1986 application for a COE levee on this property was denied by COE because the high cost exceeded the benefits. We, however, do not believe the COE will look at the City's proposal any differently than the previous application. Additionally, the City is planning to reroute traffic through this neighborhood and vacate the portion of River Road adjacent to the dike and proposed supplemental standards area. This rerouting and vacation would allow for the construction of the dike over the old roadway and outside the supplemental standards area. The City had not yet returned a written response to the request for comments when this application was submitted. If a letter is received prior to approval of this application, any comments will be addressed and will be forwarded to you.

Although the DOE understands the City's concern about leaving the RRM in place, DOE contends that the cost of remediation is excessive relative to the long-term health risks resulting from the RRM at the site. This property is an undeveloped site that will probably only be used for recreational purposes (a walking and bicycling trail) in the future. The results of the analysis of health risks and engineering data indicate that implementation of Alternative 1-No Remediation/Supplemental Standards will not result in unacceptable health risks. The implementation of Alternative 2- Complete Remediation would result in meeting applicable standards, but the \$60,500 subcontract cost would be inordinately expensive relative to the minor risk of leaving the RRM in place. The implementation of Alternative 3-Partial Remediation/Supplemental Standards will not reduce the risks to the public because the most likely alignment of a footpath is along the top of the dike, where gamma radiation from the RRM already is shielded to background levels. For these reasons, The DOE recommends that no remediation be conducted on the remaining RRM.

The DOE has agreed to prepare a database to track all deposits left behind on vicinity properties through the application of supplemental standards. The end user of this database appears to be CDPHE, who will use it to control RRM from being improperly disturbed or disposed.

The justification checklist, property condition description, considerations, cost application breakdown, justification and the property owner comments are included in the REA. In summary, the RRM that would remain on the site would not pose a significant present or future

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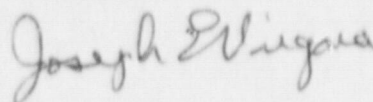
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health risk due to the low levels of radioactivity and its semi-permanent location. The supplemental standards application is being requested because remedial action would result in an estimated cost which is unreasonably high relative to the long-term health benefits (Criteria C).

The GJO would appreciate a timely review of this application because all UMTRA project activities are scheduled to end this fiscal year. If you have any questions or require any additional information, please contact John Elmer of MACTEC-ERS at (970) 248-6356 or me at (970) 248-6006.

Sincerely,



Joseph E. Virgona
Project Manager

Enclosures (2)

cc w/o enclosures:

F. Bosiljevac, DOE-AL/ERD/UMTRA

J. Decker, CDPHE/Denver

J. Hams, CDPHE/Grand Junction

J. Elmer, MACTEC-ERS

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