

Department of Energy

Albuquerque Operations Office P.O. Box 5400 Albuquerque, New Mexico 87115

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WM Record File

Distribution:

WM Project 37.
Docket No.

Mr. Dale Smith, Director
Uranium Recovery Field Office
Region IV
U.S. Nuclear Regulatory Commission
P.O. Box 25325
Denver, Colorado 80225

LPDR____

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Dear Mr. Smith:

The Technical Approach Document (TAD) has recently been distributed to all project participants. This document discussed the technical approaches and design criteria utilized by DOE in developing the Remedial Action Plans (RAPs) and associated final designs. Due to the publication of the TAD, we feel a modification to the RAPs is in order and we request your agreement.

A component of the Remedial Action Plan is the appendix containing the Engineering and Hydrological Calculation Summaries. These summaries were originally included in the RAP to aid reviewers in following the technical approaches which were used to perform the calculations that support the conceptual and final designs. Since we now have a formal Technical Approach Document, there is no longer a reason for including the Engineering and Hydrological Calculation Summaries in the RAP.

The full set of calculations compiled both by the TAC for conceptual design and the RAC for final design are submitted to the reviewers. Since these calculations are now sufficiently standardized, the formal summaries no longer serve a useful function. In addition, the reviewers are now sufficiently familiar with the standard calculation approaches that they no longer need or even consider the Engineering and Hydrological Calculation Summaries. It is our understanding that the NRC has, in informal discussions, indicated the Calculation Summaries are no longer required or used. It should be noted that the major part of the Summaries is methodology which is given in the TAD. Hence, it is our intention to cease the preparation of the Calculation Summaries for the RAP, and we request your acceptance of our position.

We feel there are some data and detail in the Calculation Summaries, however, that need to be retained in the RAP. This information will be transferred to either the Site Characterization or Site Design sections of the RAP. We believe that this approach will have no effect on the reviewers and will not compromise the quality of the RAP, but it will enhance UMTRA Project efficiency.

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In accordance with eliminating the Engineering and Hydrological Calculation Summaries from the RAP, we will make certain that the calculations provide a logical and consistent description of the work which leads to a particular design detail, i.e., there must be a consistent "thread of rationale" through the calculations. In addition, a Standard Operating Procedure specifying the format of the calculations will be compiled, and the calculations will be issued concurrently with or as soon as possible after issuance of the draft RAP and final RAP.

> Sincerely, John Glibhemely

John G. Themelis, Project Manager Uranium Mill Tailings Project Office

cc:

R. Williams, JEG J. Oldham, MK-F

M. Knapp, NRC Silver Spring