

U.S. Department of Energy

Grand Junction Office
2597 B³/₄ Road
Grand Junction, CO 81503

SEP 22 1999

John J. Surmeier, Chief
Uranium Recovery Branch
U.S. Nuclear Regulatory Commission
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
Mail Stop T7J9
Washington, D.C. 20555

Dear Mr. Surmeier:

Enclosed are two copies of the *Final Site Observational Work Plan (SOWP) for the Uranium Mill Tailings Remedial Action (UMTRA) Project New Rifle Site* for your review and comment. The purpose of the SOWP is to: 1) present existing environmental data relevant to the contaminated ground water; 2) document the application of the observational approach; 3) identify significant data gaps and subsequent field investigations; 4) complete the risk analysis; and 5) target a compliance strategy based on the working conceptual model. The SOWP reflects EPA's final protection standards issued in January 1995.

Based on previous data, coupled with additional data collected in 1998, the Department of Energy has determined that natural flushing of the upper most aquifer, in conjunction with the establishment of alternate concentration limits (for constituents without MCLs) and institutional controls, is the appropriate ground water compliance strategy for the New Rifle Site for all constituents except vanadium. Pending results of a pilot study, the strategy for vanadium may require some type of active remediation. This action will be discussed in more detail in the New Rifle Ground Water Compliance Action Plan.

Numerical modeling of ground water flow and transport indicate that constituents of concern (with the exception of vanadium) will decrease in concentrations during the 100-year natural flushing period. The proposed alternate concentration limits (ACLs) are protective of human health and the environment. Institutional controls in the form of a deed restriction and zone district will prohibit ground water use during the period of natural flushing while ground water monitoring will be conducted to observe the progress of remediation.

Information presented in the final SOWP supports the proposed compliance strategy in a manner that is consistent with the regulatory compliance framework. The Grand Junction Office respectfully requests a "no technical objection" opinion or comments by December 15, 1999. 1.1.0

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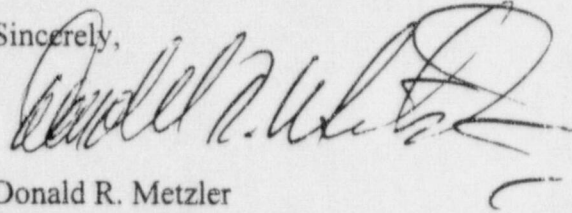
John J. Surmeier

-2-

SEP 22 1998

If you have any questions regarding this SOWP, please do not hesitate to contact me at (970) 248-7612.

Sincerely,



Donald R. Metzler
Technical/Project Manager

Enclosure

cc w/o enclosure:

C. Abrams, NRC

D. Gillen, NRC

M. Layton, NRC

B. VonTill, NRC

S. Marutzky, MACTEC-ERS

Project File GWRFL1.1 (P. Taylor)

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