

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 3, 2022

Russell J. McCallister
Federal Cleanup Director
Moab Uranium Mill Tailings
Remedial Action Project
U.S. Department of Energy
200 Grand Avenue, Suite 500
Grand Junction, CO 81501

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF'S COMMENTS ON

U.S. DEPARTMENT OF ENERGY MOAB URANIUM MILL TAILINGS REMEDIAL ACTION PROJECT ALTERNATIVE FINAL COVER SYSTEM

90 PERCENT DESIGN REPORT (DOCKET WM-00110).

Dear Russell McCallister:

By letter dated April 6, 2022, the U.S. Department of Energy, Office of Environmental Management (DOE-EM), provided the Crescent Junction Disposal Site Evapotranspiration Cover System 90 Percent Design Report to the U.S. Nuclear Regulatory Commission (NRC). The submittal is available in the NRC's Agencywide Documents Access and Management System (ADAMS) Accession No. ML22096A243. DOE provided the 90 percent design to facilitate the NRC staff's review and understanding of the changes to the remedial action plan that it is considering.

The NRC staff has completed its review of the 90 percent design report and has prepared comments for the DOE's consideration. The NRC staff's comments are focused on aspects of the remedial action plan that are impacted by the proposed change in the cover system design: geotechnical stability (slope stability and settlement), surface water hydrology and erosion protection, radon attenuation, biointrusion, vegetation, soil properties, and water balance modeling. The NRC staff's comments are provided in the enclosure to this letter and have been organized by the previously stated topics.

The NRC staff is available to clarify its comments, if necessary. The NRC staff recognizes that the U.S. Department of Energy, Office of Legacy Management (DOE-LM) may have additional insights on the ET cover design. Further discussions between DOE-EM, DOE-LM, and the NRC may help identify ways to address the NRC staff's comments. The NRC staff looks forward to working with DOE on this revision to the remedial action plan for the Moab project.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public inspections, exemptions, requests for withholding," of the NRC's "Agency Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC website at https://www.nrc.gov/reading-rm/adams.html.

If you have any questions regarding this letter, please contact me at (301) 415-0724, or by e-mail at Douglas.Mandeville@nrc.gov.

Sincerely,

Ash 7. Mahata Signed by Mandeville, Douglas on 10/03/22

Douglas T. Mandeville, Project Manager Uranium Recovery and Materials Decommissioning Branch Division of Decommissioning, Uranium Recovery and Waste Programs Office of Nuclear Material Safety and Safeguards

Docket No.: WM-00110

Enclosure:

NRC Staff Comments on DOE 90 Percent Design

cc: C. Pulskamp (DOE) Moab Mill ListServ U.S. Nuclear Regulatory Commission Staff's Comments on 90 Percent Design of Revised Cover System for Moab Uranium Mill Tailings Remedial Action Project DATE October 3, 2022

DISTRIBUTION:

ADAMS Accession No.: ML22262A065; Ltr ML22262A067

OFFICE	NMSS/DUWP /URMDB	IRES/DRA/FXHAB		NMSS/DUWP /URMDB
NAME	DMandeville <i>DM</i>	STabatabai <i>ST</i>	RVon <i>RV</i>	DMandeville <i>DM</i>
DATE	Sep 26, 2022	Sep 27, 2022	Oct 1, 2022	Oct 3, 2022

OFFICIAL RECORD COPY