



U.S. Department of Energy

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

OCT 22 1997

Mr. Ted Johnson
U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

SUBJECT: Request for Information

Dear Mr. Johnson:

Pursuant to our recent telephone conversations, please find enclosed a copy of our document entitled "Effects of Root Intrusion at the Burrell, Pennsylvania Uranium Mill Tailings Disposal Site" dated August, 1997.

You will also find a copy of the 1997 Annual Prelicensing Custodial Core Report on our Falls City, Texas UMTRA disposal site.

Once you have had a chance to review these documents, please contact me with any questions or comments. I may be reached at (970) 248-6037.

Sincerely,

Russel Edge
Project Manager

Enclosure

cc w/o enclosure:
C. Jacobson, MACTEC-ERS
GWADM 3.2.3 (record thru T. Pavlisick)

Tre Johnson ltr



9712110227 971022
PDR WASTE PDR
WM-110

PDU WASTE WM-65

MISSING
IN
INDEXES

WM-65
N120411
WM-110
N104

1997 Annual Prelicensing Inspection of the Falls City, Texas, UMTRA Title I Disposal Site

1.0 Introduction

This report presents the results of the U.S. Department of Energy's (DOE's) annual prelicensing inspection of the Uranium Mill Tailings Radiation Control Act Title I disposal site at Falls City, Texas.

The inspection was conducted on January 9, 1997, by C. Jones, Chief Inspector, and D. Langdon, Assistant Inspector, both of MACTEC-ERS Technical Assistance and Remediation Contractor at the DOE Grand Junction Office (GJO). The inspection was conducted in accordance with procedures established by the GJO to comply with requirements of 10 CFR 40.27.

The purpose of the annual inspection is to confirm site integrity, to identify changes in conditions that may affect site integrity, and to determine the need, if any, for maintenance or additional inspections and monitoring.

2.0 Results of Inspection

2.1 Specific Site Surveillance Features

The specific site surveillance features listed in Table 1 and shown on Attachment 1 were in excellent and undisturbed condition with the following exception: Eight perimeter signs have been stolen from sign posts along the northeast site boundary parallel to Farm-to-Market (FM) Road 1344. These signs will be replaced at the next inspection. (If the trial with break-away security nuts at the Durango site proves successful in deterring theft, these devices may be used to mount the replacement signs at the Falls City site.)

Not all corner survey and boundary monuments were found. The grass along the fence and in the corners of the fence is very thick, tall, and uncut. (Mowing operations leave a swath of uncut grass along all fences.) This makes it difficult to locate monuments, particularly survey monuments that are flush with the ground. There was, however, no indication of disturbance in the fence corners, so all survey monuments were adjudged to be undisturbed and in place.

2.2 Transects

For the purpose of this inspection, the site was divided into three areas called transects: site perimeter, disposal cell (including side slopes), and the outlying area between the site and Tordilla Creek southwest of the site.

Site Perimeter

The barbed-wire fence is well-strung. Posts are stable and wires are taut.

Table 1. Specific Site Surveillance Features at Falls City, Texas, Disposal Site

Identifier	Feature
-	Entrance Gate
E	Entrance Sign
P1, P2, etc	Perimeter Signs (64 total)
SMK-1	Site Marker 1
SMK-2	Site Marker 2
SM-1	Survey Monument 1
SM-2	Survey Monument 2
SM-3	Survey Monument 3
BM-1	Boundary Monument 1
BM-2	Boundary Monument 2
SP-1	Settlement Plate 1
SP-2	Settlement Plate 2
SP-3	Settlement Plate 3
SP-4	Settlement Plate 4
SP-5	Settlement Plate 5
SP-6	Settlement Plate 6
SP-7	Settlement Plate 7
SP-8	Settlement Plate 8
SP-9	Settlement Plate 9
SP-10	Settlement Plate 10
MW-709	Monitor Well 709

The area between the fence and the toe of the disposal cell is covered with a healthy, robust stand of grass. Grass coverage is not yet 100 per cent but has been noted to increase each year. There are no large areas of bare soil.

The grass had been cut to within 4 to 5 inches of the ground. The cuttings were apparently baled and hauled away. The "haying" was very clean and thorough. The site has a well-cared for appearance.

As mentioned above, a swath of grass was left uncut along the fence, but also along rock drains and around some of the as-built features, such as site markers and settlements plates. This is noted for the record, not because it is considered a particular problem. The uncut grass may indeed be beneficial as habitat for pheasant and other ground nesting or ground feeding birds.

As noted in last year's inspection report, grass is beginning to grow over and into the northern and southern rock drains. The apron outfall, midway along the northeast sideslope, is not yet affected. DOE will continue to monitor this condition. If control becomes necessary, a controlled burn or limited application of herbicide will be implemented.

Minor gully erosion, particularly in the area of the south corner of the site, was noted immediately after construction of the site was completed. Remnants of gully erosion are still evident, but they appear to be increasingly stabilized by the establishment of grass.

Disposal Cell

The top and side slopes of the disposal cell are in excellent condition. The top of the disposal cell, like the area around the base (between the disposal cell and the fence), is covered with a well-established stand of Bermuda grass. The grass is recently cut and in excellent condition. Thin and bare spots in the vegetation, noted previously, along the edge of the top of the disposal site are filling in and are no longer a concern.

All side slopes are in excellent condition except that small trees, greasewood and an unidentified species, occur at a few places on the northeast and southeast side slopes. (These trees were cut down by the groundwater sampling field party that visited the site the week of January 20.) Henceforth, inspectors will be prepared to cut new trees as they appear.

There was no evidence of trees anywhere on top of the disposal cell. It is believed, therefore, that grass cutting is an effective control.

Regraded and Outlying Areas

No development or change in land use within 0.25 miles of the site was observed.

At the request of ERD-UMTRA, the area south and southwest of the site, between the site boundary and Tordilla Creek, was inspected for springs and seeps (Attachment 2). None were found. There is evidence of minor headcutting in Tordilla Creek, which was dry at the time of this inspection. Gullies leading into Tordilla Creek from the direction of the site were followed headward, but none ended at a spring or seep. All were related to normal surface runoff. Nor did inspectors see anomalies in the vegetation anywhere in this outlying area that would indicate persistent moisture associated with a spring or seep.

3.0 Conclusions and Recommendations

3.1 Conclusions

Overall, this inspection found the Falls City site in excellent condition with no disturbances.

3.1 Observations and Recommendations

1. Perimeter signs along FM 1344 are apparently collectors' items. Eight have been stolen.
(See page 1.)

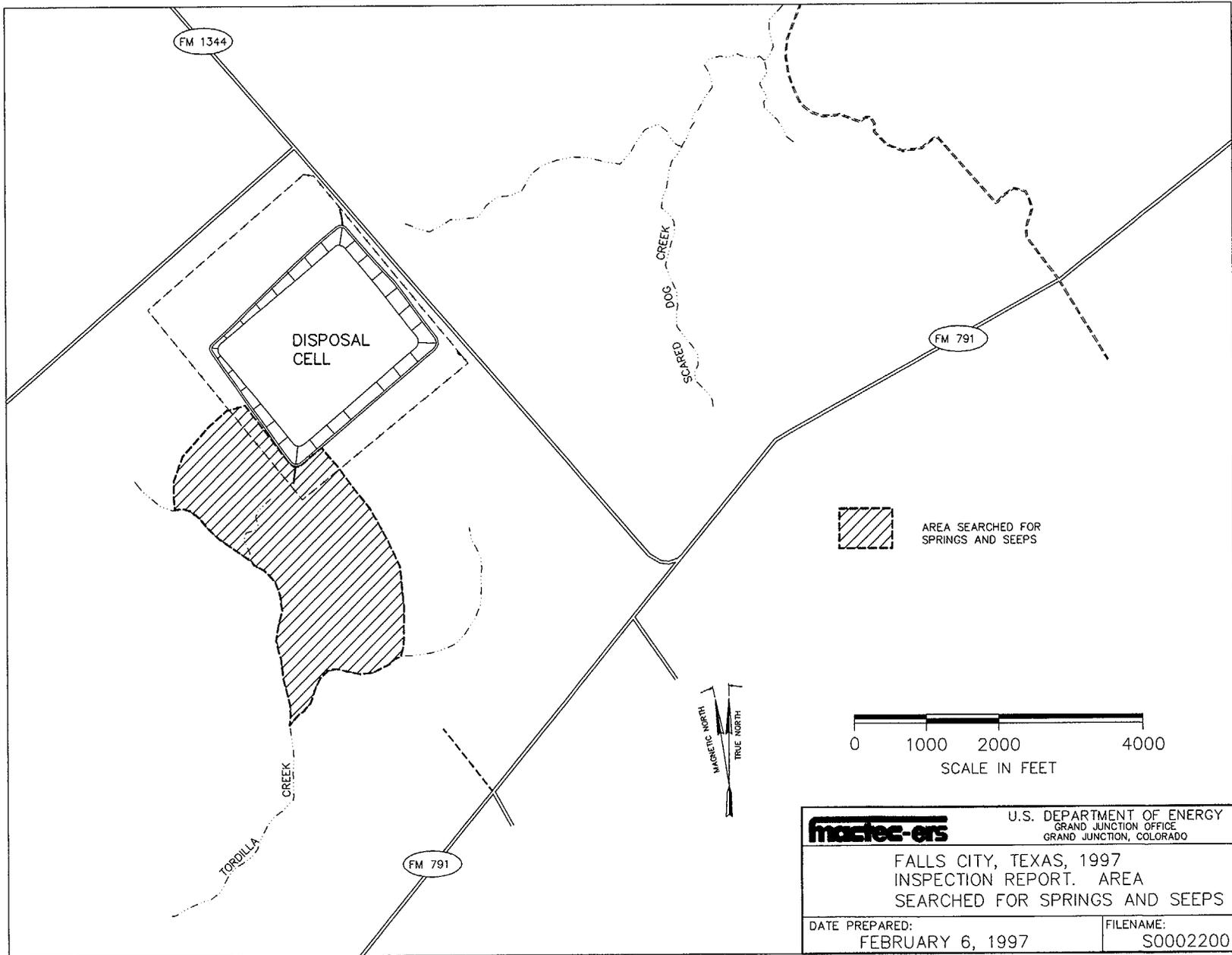
Recommendation: Replace signs at next inspection. Consider use of break-away security nuts to mount the replacement signs.

2. Grass is beginning to grow into the northern and southern rock drains. (See page 2.)

Recommendation: Continue to monitor and evaluate methods for control, e.g., controlled burn vs. herbicide.

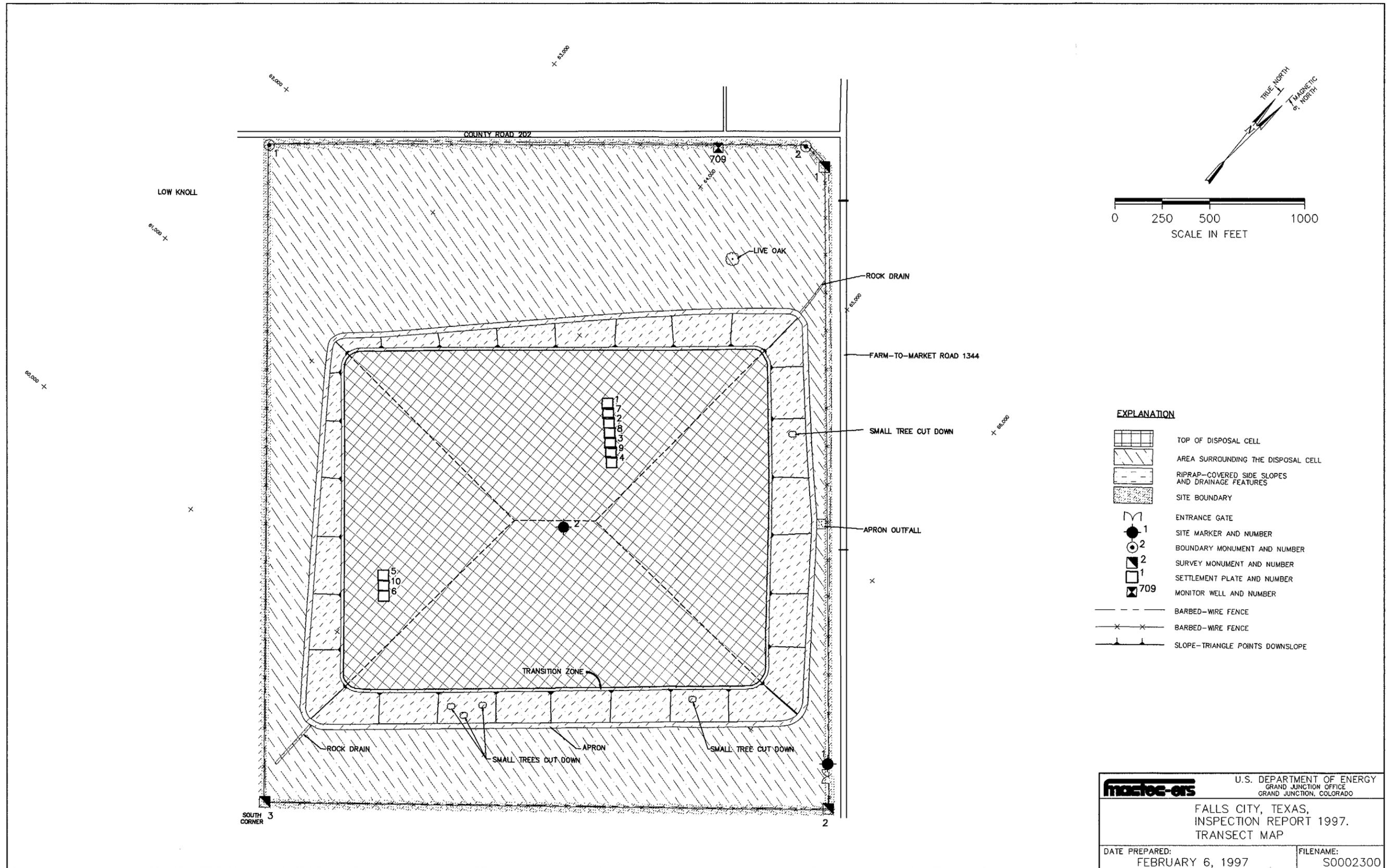
3. Small trees are beginning to appear on the northeast and southeast side slopes. (See page 3.)

Recommendation: Cut down trees as they appear during the next and following site visits.

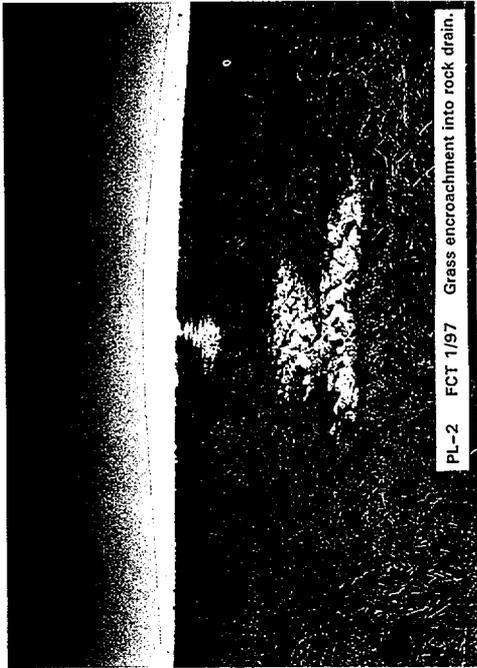


mactec-ors		U.S. DEPARTMENT OF ENERGY GRAND JUNCTION OFFICE GRAND JUNCTION, COLORADO	
FALLS CITY, TEXAS, 1997 INSPECTION REPORT. AREA SEARCHED FOR SPRINGS AND SEEPS			
DATE PREPARED: FEBRUARY 6, 1997		FILENAME: S0002200	

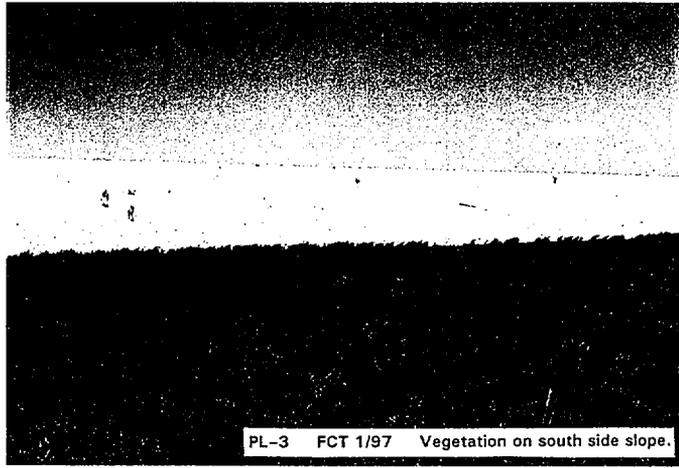
Attachment 2. Falls City, Texas, 1997 Inspection Report. Area Searched for Springs and Seeps.



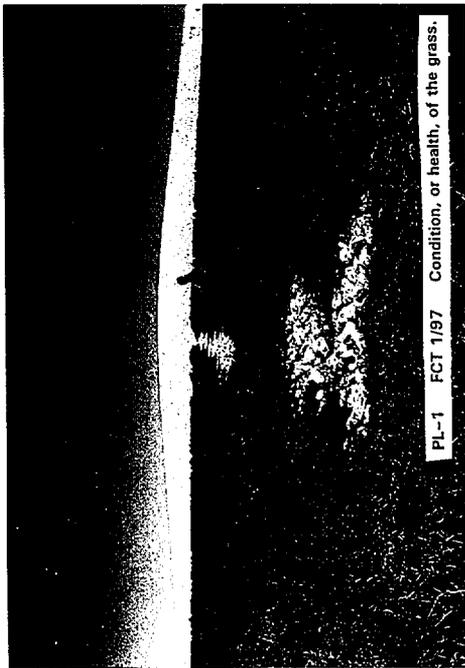
Attachment 1. Falls City, Texas, Inspection Report 1997. Transect Map.



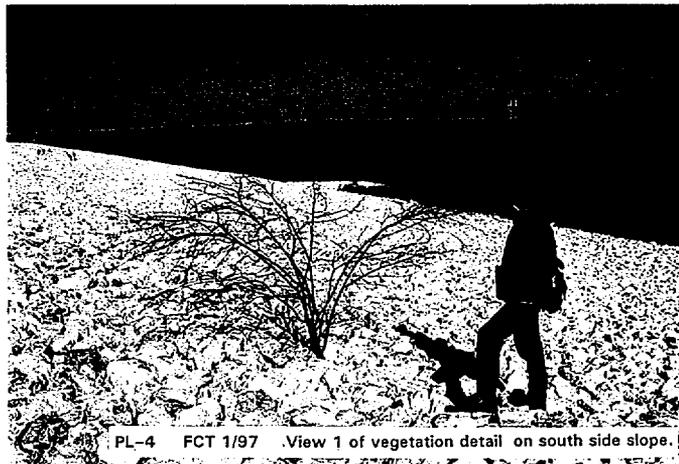
PL-2 FCT 1/97 Grass encroachment into rock drain.



PL-3 FCT 1/97 Vegetation on south side slope.



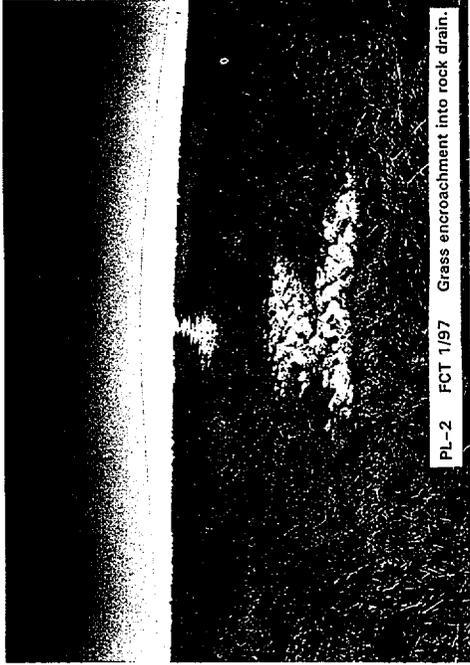
PL-1 FCT 1/97 Condition, or health, of the grass.



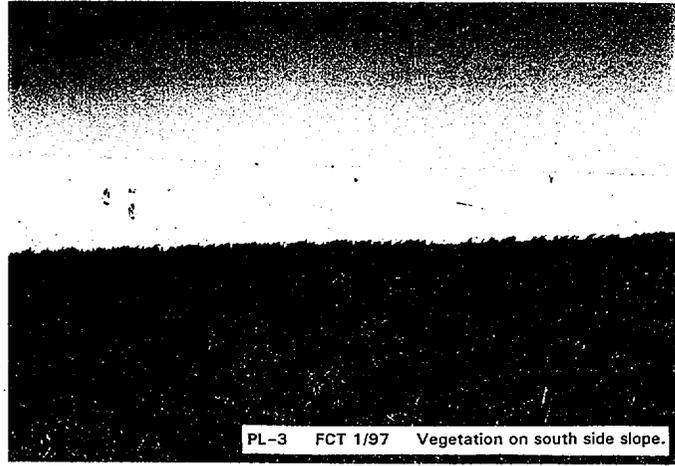
PL-4 FCT 1/97 View 1 of vegetation detail on south side slope.



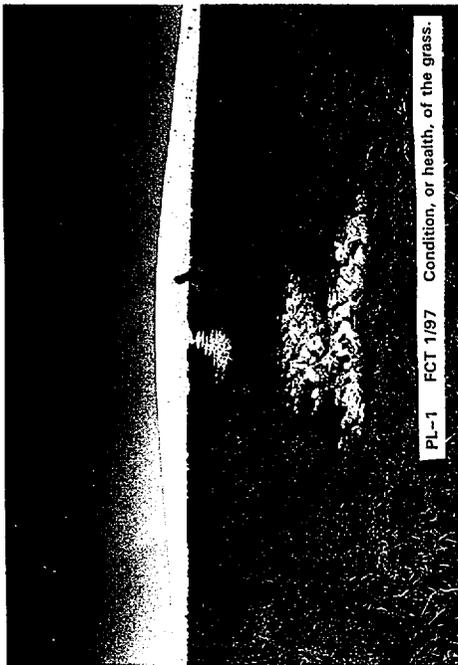
PL-5 FCT 1/97 View 2 of vegetation detail on south side slope.



PL-2 FCT 1/97 Grass encroachment into rock drain.



PL-3 FCT 1/97 Vegetation on south side slope.



PL-1 FCT 1/97 Condition, or health, of the grass.



PL-4 FCT 1/97 View 1 of vegetation detail on south side slope.



PL-5 FCT 1/97 View 2 of vegetation detail on south side slope.