



U.S. Department of Energy

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MAR 03 2000

Thomas H. Essig, Chief
Uranium Recovery and Low-Level Waste Branch
U.S. Nuclear Regulatory Commission
Mail Stop T7J8
Washington, D.C. 20555-0001

wm-54

Subject: Draft *Guidance for Implementing the Long-Term Surveillance Program for UMTRCA Title I and Title II Disposal Sites*

Dear Mr. Essig:

Three copies of the draft *Guidance for Implementing the Long-Term Surveillance Program for UMTRCA Title I and Title II Disposal Sites* are enclosed for NRC review. This guidance document is intended to supercede the February 1996 guidance document entitled *Guidance for Implementing the Long-Term Surveillance Program for UMTRA Project Title I Disposal Sites*.

The purpose of the new document is to generalize the previous guidance to include the Title II disposal sites in addition to the Title I sites. This opportunity was also used to modify certain sections of the existing guidance to bring it more directly in line with the regulations and current program practice.

As requested by Mr. Dan Gillen of your staff, the text in the document that has been modified from the previous guidance has been shaded. Since the 1996 guidance had already received NRC approval, Mr. Gillen suggested that we do this to expedite the NRC review, thereby allowing the staff to concentrate on the changes.

Section 2.4.1.6, entitled *Inspection Reporting Requirements*, has been significantly revised to reflect the reporting format agreed upon by NRC in the September 25, 1996, letter from Joseph J. Holonich of NRC to Joseph Virgona of DOE (subject, *Format for Annual Inspection Reports for UMTRCA Title I Sites*).

Section 2.4.5, entitled *Emergency Measures and Ground Water Corrective Action*, has been revised to draw a clearer distinction between the concept of "Corrective Action" and other site repairs. The EPA regulations in 40 CFR 192 use the term "Corrective Action" only in relation to ground water. The DOE feels that these revisions will result in guidance that is more in line with the language of the regulations.

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Also, please note that Attachment 1 has been augmented by including 10 CFR 40.28 and Appendix A in addition to 10 CFR 40.27; and Attachment 3 contains a revised model inspection checklist.

If NRC has questions about this document, please contact me at 970-248-6037.

Sincerely,



Russel Edge
LTSM Program Manager

Enclosure

cc w/enclosure:
Project File LGPF 1.2 (H. Salter)

cc w/o enclosure:
M. Plessinger, MACTEC-ERS

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