

## Letter for Electronic Distribution

Original signed letter on file at the following address

Nevada Division of Environmental Protection  
Bureau of Federal Facilities  
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June 9, 2000

Ms. Runore C. Wycoff, Director  
Environmental Restoration Division  
U.S. Department of Energy  
Nevada Operations Office  
P.O. Box 98518  
Las Vegas, Nevada 89193-8518

RE: Evaluation of Data Needs for Yucca Flat/Climax Mine Corrective Action Investigation

Dear Ms. Wycoff:

It has been stated by DOE/NV that insufficient specific technical guidance, in the form of specific data needs, has been provided by NDEP to DOE/NV for UGTA related work. An example given was lack of a specific requirement for DOE to acquire site specific data at a depth which extended into the carbonates beneath the Frenchman Flat Corrective Action Unit (FF CAU).

While some overall data needs for characterizing and predicting the transport of pollutants and contaminants in the subsurface can readily be identified by NDEP, and these would be consistent with those identified in letters commenting on the FF and PM CAIPs (Liebendorfer to Wycoff, dated 09/21/99 and 12/20/99 respectively), the lack of specificity in the Conceptual Model (CMO) for the YF/CM CAU presently precludes doing more than that in this case.

Provided below is NDEP's position on this matter in the context of the Conceptual Model portion of the document Corrective Action Investigation Plan for Corrective Action Units 97 and 100: Yucca Flat and Climax Mine, Nevada Test Site, Draft, Revision No. 0, March 2000 (YF/CM DCAIP) currently under review by NDEP.

The results of the review to date indicate a lack of clarity as to what site specific data are available and were utilized in the development of the CMO presented in the YF/CM DCAIP. This lack of specific detail defining the extent to which the CMO is based on CAU-specific data limits NDEP's ability to identify specific data needed to improve the CMO and hence the overall understanding of YF/CM CAU flow system.

In order for NDEP to identify areas where additional work is needed to acceptably characterize this site, a revised CMO, confined to the YF and former CM CAUs and immediately adjacent areas, must be submitted. The CMO should depict as full a picture as possible of DOE's current understanding of the hydrogeology and its impact on contaminant distributions and travel flow paths.. However, DOE must

distinguish between which portions of the CMO were created with existing CAU-specific data and which portions of the CMO were created through interpretation of non CAU specific data. DOE must submit this revised CMO clearly delineating the origin of each source information utilized to create the CMO. Delays in submitting this information may not be considered acceptable justification for future extensions to the presently proposed Deadline for submittal of the CAIP for this project .

Questions regarding this matter may be addressed to S. Jaunaraajs at (775) 687-4670 Ex. 3030, C. Goewert at (702) 486-2865, C. Case at (775) 687-4670 Ex. 3029, or me at (775) 687-4670 Ex. 3039.

Sincerely,

Paul J. Liebendorfer, P.E.  
Chief  
Bureau of Federal Facilities

PJL/SJ/CJG/CC/js

cc:

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