

8.0 Annual Inspection of the Gunnison, Colorado, UMTRCA Title I Disposal Site

8.1 Compliance Summary

The Gunnison, Colorado, Uranium Mill Tailings Radiation Control Act (UMTRCA) Title I Disposal Site was inspected on June 4, 2012. The disposal cell and all associated surface water diversion and drainage structures were in excellent condition and functioning as designed. Six riprap test areas on the cell apron and diversion ditches were visually inspected and photographed; no apparent rock degradation was noted when compared to previous photos. Two damaged perimeter signs were replaced. No other maintenance needs or cause for a follow-up or contingency inspection was identified.

Numbers in the left margin of this report refer to items summarized in the “Executive Summary” table.

8.2 Inspection Requirements

Requirements for the long-term surveillance and maintenance of the site are specified in the *Long-Term Surveillance Plan for the Gunnison, Colorado, Disposal Site* (DOE/AL/62350-222, Rev. 2, U.S. Department of Energy [DOE], April 1997; LTSP) and in procedures established by DOE to comply with the requirements of Title 10 *Code of Federal Regulations* Part 40.27 (10 CFR 40.27).

Table 8-1. License Requirements for the Gunnison Disposal Site

Requirement	Long-Term Surveillance Plan	This Report
Annual Inspection and Report	Section 3.0	Section 8.4
Follow-Up or Contingency Inspections	Section 3.5	Section 8.5
Routine Maintenance and Repairs	Section 5.0	Section 8.6
Groundwater Monitoring	Section 4.1	Section 8.7.1
Corrective Action	Section 6.0	Section 8.8

8.3 Institutional Controls

The 92-acre site is owned by the United States of America and was accepted under the U.S. Nuclear Regulatory Commission general license (10 CFR 40.27) in 1997. DOE is the licensee and, in accordance with the requirements for UMTRCA Title I sites, is responsible for the custody and long-term care of the site. Institutional controls at the site include federal ownership of the property and the following features that are inspected annually: site markers, survey and boundary monuments, warning/no-trespassing signs, a site perimeter fence, and a locked gate at the site entrance.

8.4 Inspection Results

The site, southeast of Gunnison, Colorado, was inspected on June 4, 2012. S. Campbell and R. Johnson of the S.M. Stoller Corporation, the Legacy Management Support contractor at the DOE office in Grand Junction, Colorado, conducted the inspection. D. Steckley, the DOE Office of Legacy Management site manager, and W. Naugle, of the Colorado Department of Public Health and Environment, attended the inspection.

The purposes of the inspection were to confirm the integrity of visible features at the site, to identify changes in conditions that may affect site integrity, and to determine the need, if any, for maintenance or additional inspections and monitoring.

8.4.1 Site Surveillance Features

The locations of site surveillance features are shown on Figure 8–1. Inspection results and recommended maintenance activities associated with site surveillance features are included in the following subsections. Photographs to support specific observations are identified in the text and on Figure 8–1 by photograph location (PL) numbers.

8.4.1.1 Site Access, Entrance Gate, and Entrance Sign

Access to the site is off Gunnison County Road 42 onto U.S. Bureau of Land Management Road 3068 to the site entrance gate. The road to the site is an all-weather gravel road maintained by the U.S. Bureau of Land Management and was in good condition.

The entrance gate is a simple barbed-wire gate in the stock fence that surrounds the site. The entrance gate, located along the south portion of the perimeter fence, was secured by a padlock and chain to the adjoining post and was in good condition.

An entrance sign is bolted to a perimeter fence post next to the entrance gate. The sign was in excellent condition.

8.4.1.2 Fence and Perimeter Signs

A three-strand, barbed-wire fence delineates the site; most of it is set along the property boundary. The fence was in good condition (PL–1). Two locked barbed-wire gates—one on the north fence line and the other on the east fence line—provide monitoring-well access. The gates were locked and in good condition.

Forty-five perimeter signs are bolted to the perimeter fence posts. Perimeter signs P1 and P3 were damaged and were replaced with new signs. Perimeter signs P6 and P38 have bullet holes but were legible. The other signs were in good condition.

8.4.1.3 Site Markers

The site has two granite site markers. Site markers SMK–1 (just inside the entrance gate; PL–2) and SMK–2 (on top of the disposal cell) were in excellent condition.

8.4.1.4 Survey Monuments and Boundary Monuments

The three combined survey/boundary monuments (SM–1/BM–1, SM–2/BM–2, and SM–3/BM–3) and eight additional boundary monuments (BM–4 through BM–11) were in excellent condition.

8.4.1.5 Monitoring Wells

Sixteen wells constitute the groundwater monitoring network for the site. The wells were secure and in excellent condition (PL–3).

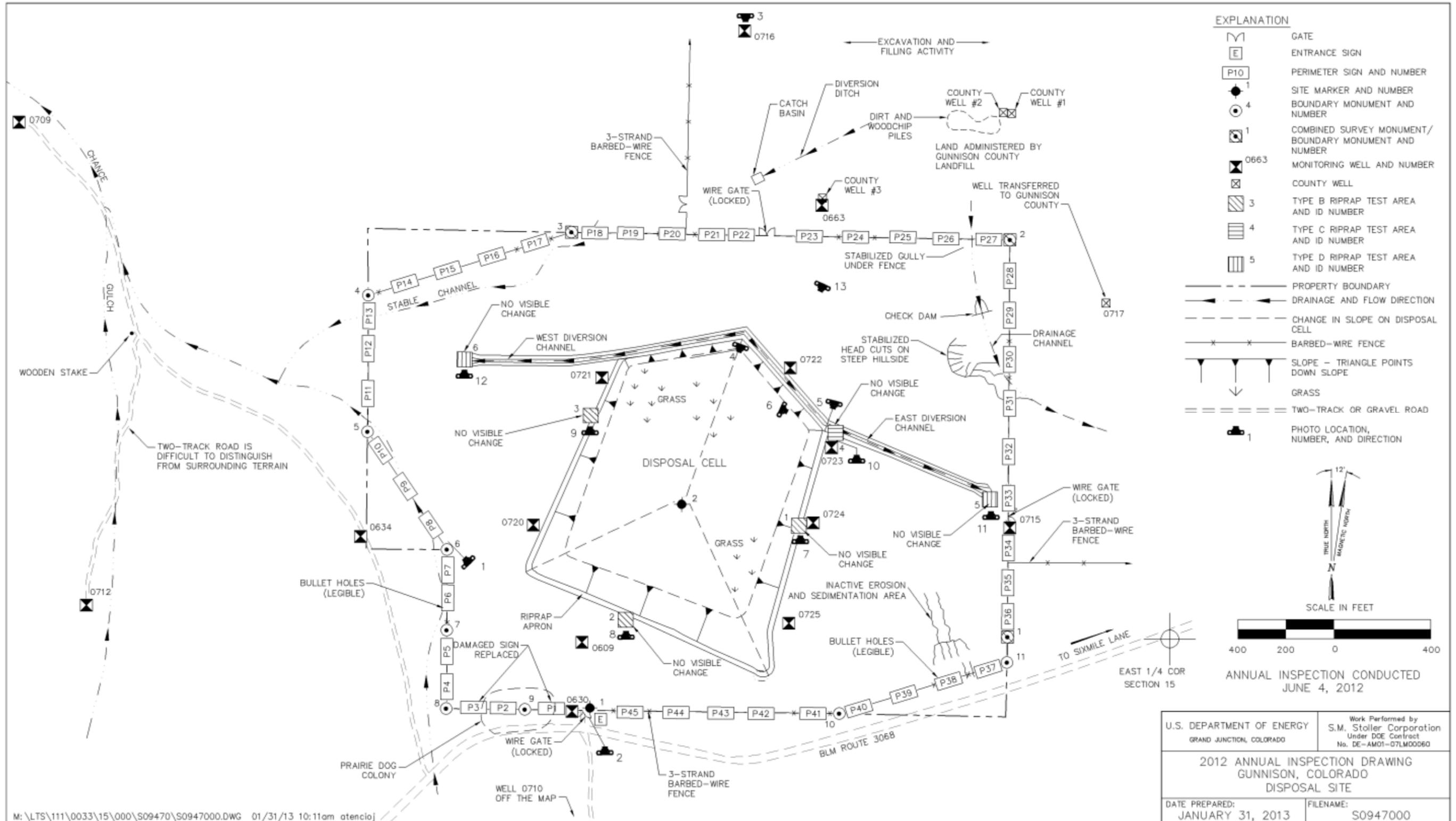


Figure 8-1. 2012 Annual Compliance Drawing for the Gunnison Disposal Site

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8.4.2 Inspection Areas

In accordance with the LTSP, the site is divided into four inspection areas (referred to as “transects” in the LTSP) to ensure a thorough and efficient inspection: (1) the top of the disposal cell; (2) the disposal cell side slopes, apron, and diversion channels; (3) the area between the disposal cell and the site boundary; and (4) the outlying area.

Within each area, the inspectors examined specific site-surveillance features, drainage structures, vegetation, and other features. Inspectors examined each area for evidence of erosion, settling, slumping, or other disturbances that might affect the site’s integrity, protectiveness, or long-term performance.

8.4.2.1 Top of the Disposal Cell

The rock-covered top of the disposal cell was in excellent condition (PL–4). There was no evidence of erosion, settling, slumping, or rock degradation. Several isolated patches of grass are randomly distributed over the disposal cell cover; however, these shallow-rooted plants are not a cause for concern.

8.4.2.2 Disposal Cell Side Slopes, Apron, and Diversion Channels

The riprap-covered side slopes, apron, and diversion channels were in good condition (PL–5 and PL–6). No evidence of slumping, settling, rock degradation, or encroachment of vegetation was observed.

The condition of the riprap in six monitoring test areas was visually inspected and photographed. The test areas, each roughly 1 square meter in area, are in critical flow path locations in the apron and diversion channels. The corners of each monitoring plot are marked with orange paint. The riprap in all of the test areas was in excellent condition. When the rocks were compared to the photos taken of them in 2007, there was no evidence that individual rocks had split or otherwise been degraded (PL–7 through PL–12). As outlined in the LTSP, annual photographing and comparing of these test areas was performed through 2002; after that, the LTSP requires the test areas to be photographed every 5 years (through 2017). The next and final set of photos will be taken in 2017.

Precipitation runoff from the cell occasionally ponds in a low-lying area along the southeast corner of the cell. The riparian-type vegetation that has become established in this area indicates that the area retains moisture much of the time. Water collection in this area does not pose a problem because the cell is designed to drain to the southeast, and any water that ponds there is below the elevation of the encapsulated tailings material. This location was dry at the time of the inspection.

8.4.2.3 Area Between the Disposal Cell and the Site Boundary

There are reclaimed and undisturbed areas between the disposal cell and the site perimeter. Both types of areas were in good condition (PL–13). No erosion concerns were observed. In general, reclaimed areas have good vegetation coverage, consisting mostly of grass. As expected, shrubs and forbs are much less abundant and less diverse in reclaimed areas than they are in undisturbed areas.

8.4.2.4 Outlying Area

Gunnison County owns the land that adjoins the site boundary to the north and east, and uses the land for a municipal landfill. Landfill operations have encroached to within approximately 400 feet of the northeast corner of the DOE property boundary. Although landfill activities do not appear to threaten the site, future inspections will continue to monitor the level of activity occurring near the DOE property boundaries and site surveillance features (e.g., fences, monitoring wells).

8.5 Follow-Up or Contingency Inspections

DOE will conduct follow-up inspections if (1) an annual inspection or other site visit reveals a condition that must be reevaluated during a return to the site, or (2) a citizen or outside agency notifies DOE that conditions at the site are substantially changed.

No need for a follow-up or contingency inspection was identified during the inspection.

8.6 Maintenance and Repairs

Two damaged perimeter signs were replaced during the inspection. No other maintenance items were identified.

8.7 Environmental Monitoring

8.7.1.1 Groundwater Monitoring

DOE monitors groundwater at the site to demonstrate compliance with U.S. Environmental Protection Agency groundwater protection standards in 40 CFR 192.03 and to demonstrate that the disposal cell is performing as designed. The monitoring network consists of 16 wells, including six point-of-compliance (POC) wells to monitor cell performance, two wells to monitor background groundwater quality, and eight wells for water-level measurements.

In accordance with the LTSP, groundwater was sampled and water levels were measured annually from 1998 through 2001. Following the 2001 sampling event, the monitoring frequency changed to once every 5 years. The most recent sampling event was in 2011.

The indicator analyte for cell performance at the site is uranium. This analyte was selected on the basis of its presence in tailings pore fluid, its relatively high mobility in groundwater, and its low concentration in upgradient (background) groundwater. The target concentration for uranium is 0.013 milligram per liter (mg/L). The basis for this value is the maximum observed concentration of uranium in background samples determined prior to long-term surveillance and maintenance. The UMTRCA maximum concentration limit that the U.S. Environmental Protection Agency established for uranium is 0.044 mg/L.

Table 8–2. Active Monitoring Wells at the Gunnison Disposal Site

Point-of-Compliance and Background Wells	Water-Level Wells
0720 (point-of-compliance)	0630
0721 (point-of-compliance)	0634
0722 (point-of-compliance)	0663
0723 (point-of-compliance)	0709
0724 (point-of-compliance)	0710
0725 (point-of-compliance)	0712
0609 (background)	0714
0716 (background)	0715

8A Groundwater at the site was sampled in May 2011. The concentrations of uranium in samples collected at background wells 0609 and 0716 were 0.0038 mg/L and 0.0022 mg/L, respectively. The concentrations of uranium in samples collected from POC wells ranged between 0.001 mg/L and 0.005 mg/L, which is consistent with historical results. Uranium results from the POC wells were an order of magnitude below the action level of 0.013 mg/L, indicating that the disposal cell continues to perform as an efficient containment system. The groundwater will be sampled again in 2016.

8.8 Corrective Action

Corrective action is taken to correct out-of-compliance or hazardous conditions that create a potential health and safety problem or that may affect the integrity of the disposal cell or compliance with 40 CFR 192.

No corrective action was required in 2012.

8.9 Photographs

Photo Location Number	Azimuth	Photograph Description
PL–1	315	Perimeter fence along the west side of the site.
PL–2	0	Site marker SMK–1 at the site entrance.
PL–3	180	Monitoring well 0716 north of the disposal site.
PL–4	200	View southwest across the top of the disposal cell.
PL–5	196	East side slope and riprap apron of the disposal cell.
PL–6	115	Northeast corner of the disposal cell and the east diversion channel.
PL–7	0	Riprap Test Area No. 1 (Type B riprap) on the cell's east apron (June 4, 2012).
PL–7A	0	Riprap Test Area No. 1 (Type B riprap) on the cell's east apron (May 21, 2007).
PL–8	0	Riprap Test Area No. 2 (Type B riprap) on the cell's south apron (June 4, 2012).
PL–8A	0	Riprap Test Area No. 2 (Type B riprap) on the cell's south apron (May 21, 2007).
PL–9	0	Riprap Test Area No. 3 (Type B riprap) on the cell's northwest apron (June 4, 2012).
PL–9A	0	Riprap Test Area No. 3 (Type B riprap) on the cell's northwest apron (May 21, 2007).
PL–10	0	Riprap Test Area No. 4 (Type C riprap) in the east diversion channel (June 4, 2012).
PL–10A	0	Riprap Test Area No. 4 (Type C riprap) in the east diversion channel (May 21, 2007).
PL–11	0	Riprap Test Area No. 5 (Type D riprap) at the east diversion channel outlet (June 4, 2012).
PL–11A	0	Riprap Test Area No. 5 (Type D riprap) at the east diversion channel outlet (May 21, 2007).
PL–12	0	Riprap Test Area No. 6 (Type D riprap) at the west diversion channel outlet (June 4, 2012).
PL–12A	0	Riprap Test Area No. 6 (Type D riprap) at the west diversion channel outlet (May 21, 2007).
PL–13	205	Reclaimed and undisturbed areas north of the disposal cell.



GUD 6/2012. PL-1. Perimeter fence along the west side of the site.



GUD 6/2012. PL-2. Site marker SMK-1 at the site entrance.



GUD 6/2012. PL-3. Monitoring well 0716 north of the disposal site.



GUD 6/2012. PL-4. View southwest across the top of the disposal cell.



GUD 6/2012. PL-5. East side slope and riprap apron of the disposal cell.



GUD 6/2012. PL-6. Northeast corner of the disposal cell and the east diversion channel.



GUD 6/2012. PL-7. Riprap Test Area No. 1 (Type B riprap) on the cell's east apron (June 4, 2012).



GUN 5/2007. PL-7A. Riprap Test Area No. 1 (Type B riprap) on the cell's east apron (May 21, 2007).



GUD 6/2012. PL-8. Riprap Test Area No. 2 (Type B riprap) on the cell's south apron (June 4, 2012).



GUN 5/2007. PL-8A. Riprap Test Area No. 2 (Type B riprap) on the cell's south apron (May 21, 2007).



GUD 6/2012. PL-9. Riprap Test Area No. 3 (Type B riprap) on the cell's northwest apron (June 4, 2012).



GUN 5/2007. PL-9A. Riprap Test Area No. 3 (Type B riprap) on the cell's northwest apron (May 21, 2007).



GUD 6/2012. PL-10. Riprap Test Area No. 4 (Type C riprap) in the east diversion channel (June 4, 2012).



GUN 5/2007. PL-10A. Riprap Test Area No. 4 (Type C riprap) in the east diversion channel (May 21, 2007).



GUD 6/2012. PL-11. Riprap Test Area No. 5 (Type D riprap) at the east diversion channel outlet (June 4, 2012).



GUN 5/2007. PL-11A. Riprap Test Area No. 5 (Type D riprap) at the east diversion channel outlet (May 21, 2007).



GUD 6/2012. PL-12. Riprap Test Area No. 6 (Type D riprap) at the west diversion channel outlet (June 4, 2012).



GUN 5/2007. PL-12A. Riprap Test Area No. 6 (Type D riprap) at the west diversion channel outlet (May 21, 2007).



GUD 6/2012. PL-13. Reclaimed and undisturbed areas north of the disposal cell.

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