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# FUSRAP

CCN 084419 - 01

FUSRAP COMMUNICATIONS DISTRIBUTION  
DOE/ORO FORMER SITES RESTORATION DIV (EW-93)  
DATE PROCESSED BY PDCC 01/09/92

FSRD Y COMM TYPE 2BQ  
COMM REF TELECON  
ADMIN RCD

SUBJECT WASTE CONTAINMENT STRUCTURE CNFSS

FROM RAMSEY TO HOUSEMAN COMM DATE 01/09/92

ADDR CODE

CLOSES CCN S WBS 158 SUBJECT CODE 7440

AFFECTED DOCUMENT  
TRACS

## RESPONSE TRACKING INFO

PRIMARY OWED TO ORG OWED BY ORG

TARGET DT CLOSING CCN COMP DT CLOSING REF

SECONDARY OWED TO ORG OWED BY ORG

TARGET DT CLOSING CCN COMP DT CLOSING REF

MESSAGE:

W/A W/O			W/A W/O			W/A W/O		
DIRECTOR, FSRD:	L. Price	FSRD	PROGRAM MANAGER: R.K. Kennedy	SAIC		PROGRAM MANAGER: G. Hovey	BPM	
DEP. DIRECTOR, FSRD:	W. Seay	FSRD	DEPUTY PROGRAM MGR: J. King	SAIC		DEPUTY PROGRAM MGR: P. Crohwell	BPM	
SITE MANAGER:	D. Adler	FSRD	TECH. DIRECTOR: J. Waddell	SAIC		R. Harbert	BPM	
	S. Cange	FSRD	SITE MANAGER: M. Byrnes	SAIC		PROJECT MANAGER: S. Uedde	BPM	
	R. Kirk	FSRD		A. Davis	SAIC	G. Palau	BPM	
PROJECT SUPPORT GRP: J. Hart	FSRD			W. McNeill	SAIC	C. Hickey	BPM	
	S. Oldham	FSRD				E. McNamee	BPM	
	G. Hartman	FSRD				CONSTRUCTION	BFC	
PRGM ANALYST: B. Hughlett	FSRD					ENGINEERING & TECHNOLOGY	BET	
SECRETARY: M. Seiber/M. Dyke	FSRD					ENVIRON HEALTH & SAFETY	BEH	
FSRD CHRON FILE						HEALTH & SAFETY	BEH	
FSRD NOTEBOOKS						TM/VEBERLINE	BEH	
READING FILE						OPERATIONS	BOP	
DOE/P&CD: French/Sistrunk	DCO					PROCUREMENT	BPO	
DOE/HQ: J. Wagoner	DHO					PROJECT ADMINISTRATION	BPA	
						TECHNICAL REPORTS	BTR	
ANL: A.J. Dvorak	ANL					PROJECT AUTOMATION	BAU	
	A. Gelsler	ANL				PROJECT CONTROLS	BPC	
	G. Mersman	ANL				PUBLIC AFFAIRS	SPR	
ORAL: 137/118 MIDDLESEX	ORAL					QUALITY ASSURANCE	BOA	
ORNL: 130 COLONIE (CISB)	ORNL					PDCC READING FILE		
						TO DOE		
						FROM DOE		
						PDCC		
						CHRON FILE		

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PLEASE RETURN TO PDCC FOR CORRECTIONS

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TELEPHONE CONVERSATION

Jan. 9, 1992

From: Jim Ramsey, BNI, FUSRAP Regulatory Compliance  
To: Van Houseman, USEPA, Mining Wastes Section (703) 308-8419

I discussed with Mr. Houseman the issue raised by Ron Kirk about the waste containment structure at NFSS and compliance with 40 CFR 192, Environmental Protection Agency Standards For Protection Against Uranium Mill Tailings.

Mr. Houseman explained first that for mining waste other than uranium mill tailings, existing depository sites are generally grandfathered as the regulations are amended. The key with uranium mill tailing wastes seem to be whether or not the wastes are "actively managed". If uranium mill tailings are actively managed then they are subject to RCRA Subtitle C and to amendments of Section 192. Mr. Houseman agreed that a situation like NFSS would not constitute active management of the wastes because they have remained effectively sealed within the pile. This was true even during the recent pile consolidation effort.

In addition, Mr. Houseman stated that 40 CFR 192 has not been amended since 1983 and that amendments to other mining wastes standards since 1983 do not effect Section 192. Therefore, it is reasonable to conclude that the pile at NFSS remains in compliance with 40 CFR 192.

Route: R. E. Kirk  
C. R. Hickey  
P. R. Huber  
M. M. Bengé  
G. R. Galen