

STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

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MAY 09 2006

Colorado Department
of Public Health
and Environment

May 3, 2006

Mr. Linn Havelick
Director of Environmental Health and Safety
Chauvenet Hall Rm. 194
1015 14th Street
Golden, CO 80401

Subject: RML 617-01 – Response to Comment Response Dated April 6, 2006 on the Colorado School of Mines Research Institute - Creekside Site Draft Site Characterization Work Plan Dated January 24, 2006 Prepared by S.M. Stoller Corporation

Dear Mr. Havelick:

Staff has completed its review of the Colorado School of Mines Research Institute - Creekside Site Draft Site Characterization Work Plan Dated January 24, 2006 prepared by S.M. Stoller Corporation. Before accepting the report, clarification in your response is needed.

With regards to mixing of materials and possible disposal on-site, we agree that this issue will be resolved at a future date if that is the proposed final disposal option. We would simply state regarding CSMRI's response that independently following NRC's position is not an option. CDPHE will make the determination on mixing using our existing authority and consistent with our rules and regulations.

On page 5 in your response to CDPHE comments regarding page 5-3, Site Characterization a method of excavation is described to something like peeling an onion. Due to the heterogeneity of the material on site and possible shielding of contaminated zones by cleaner soils, trenching to verify that there are no deeper deposits should be included.

On page 9 in your response to CDPHE comments regarding page 6-10, 6.8 Sample Acquisition, it is indicated that a correlation factor to compare wet weight and dry weight soil samples will be used. Please describe how this correlation factor will be used.

On Page 10, with regards to Appendix G – ALARA Assessment, we still disagree with your response. Cleaning up just to the DCLG's may not be adequate if you can do better, and this has been done at numerous other radioactive sites. A simple statement that the cleanup objective is to the DCLG's, however additional removal may be done to meet the ALARA principle, should be included.

We look forward to receiving the final Site Characterization Report and decommissioning plan as required by 3.16.4 of the Colorado Rules and Regulations Pertaining to Radiation Control.

If you have any questions with regards to this letter, please call me at 303.692.3452.

Yours Truly,



Philip S. Stoffey
Project Manager
CSMRI Creekside Site
Hazardous Materials and Waste Management Division

cc: Joseph Gordon, Stoller Project Director
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