6.0 Grand Junction, Colorado, Disposal Site

6.1 Compliance Summary

The Grand Junction, Colorado, Uranium Mill Tailings Radiation Control Act (UMTRCA) Title I Disposal Site (site) was inspected on December 9, 2020. No changes were observed on the disposal cell or in the associated drainage features. Inspectors identified minor maintenance needs that will be handled during the next routine maintenance event, but no cause for a follow-up inspection was identified.

A portion of the disposal cell remains open to receive low-level radioactive materials from various sources. The open disposal cell and its supporting structures and facilities are not included in the annual inspection. Ongoing disposal cell cover study areas, which include a cover study on top of the disposal cell and lysimeter facilities adjacent to the north and east sides of the disposal cell, are not inspected. This annual inspection includes the completed portion of the disposal cell and the remaining portions of the disposal site.

The U.S. Department of Energy (DOE) Office of Legacy Management (LM) conducts annual groundwater monitoring at the site as a best management practice. Three monitoring wells are sampled to verify that groundwater in onsite paleochannels is not affected by potential seepage (i.e., transient drainage) from the disposal cell. Groundwater monitoring was last completed May 29, 2020. Groundwater monitoring results confirm that groundwater in the paleochannels continues to be unaffected by potential transient drainage from the disposal cell.

6.2 Compliance Requirements

Requirements for the long-term surveillance and maintenance of the completed portion of the disposal cell and the remaining portion of the site are specified in the site-specific Interim Long-Term Surveillance Plan (LTSP) (DOE 1998) and in procedures LM established to comply with the requirements of the U.S. Nuclear Regulatory Commission (NRC) general license at Title 10 *Code of Federal Regulations* Section 40.27 (10 CFR 40.27). Table 6-1 lists these requirements.

Requirement	LTSP	This Report	10 CFR 40.27
Annual Inspection and Report	Sections 3.0 and 6.2	Section 6.4	(b)(3)
Follow-Up Inspections	Section 3.4	Section 6.5	(b)(4)
Maintenance and Repairs	Sections 2.7.3 and 4.0	Section 6.6	(b)(5)
Corrective Action	Section 5.0	Section 6.7	_
Groundwater Monitoring	Section 2.6	Section 6.8	(b)(2), (b)(3)

Table 6-1. Interim Requirements for the Grand Junction, Colorado, Disposal Site

6.3 Institutional Controls

The 360-acre site, identified by the property boundary shown in Figure 6-1, is owned by the United States. Low-level radioactive waste will be received until the disposal cell's legally mandated closure date or until it is filled to capacity, whichever comes first.

In December 2020, Congress passed legislation that will extend the final disposal cell closure date from 2023 to 2031. LM's operations to receive radioactive waste at the site will cease in September 2031. Following closure of the disposal cell, the Interim LTSP (DOE 1998) for the site will be revised and finalized; with NRC acceptance of the final LTSP, the site will come under NRC's general license. Institutional controls (ICs) at the site include federal ownership of the property, administrative controls, and the following physical ICs that are inspected annually: the disposal cell and associated drainage features, entrance gate and signs, perimeter fence and signs, boundary monuments, and wellhead protectors.

6.4 Inspection Results

The site, 18 miles southeast of Grand Junction, Colorado, was inspected on December 9, 2020. The inspection was conducted by P. Wetherstein, H. Petrie, and L. Sheader of the Legacy Management Support contractor. S. Woods from LM also attended the inspection. The purposes of the inspection were to confirm the integrity of the disposal cell and other visible site features, identify changes in conditions that might affect conformance with the Interim LTSP, and determine the need, if any, for immediate maintenance, corrective action, or additional inspection and monitoring.

6.4.1 Site Surveillance Features

Figure 6-1 shows the locations of site features in black and gray font, including site surveillance features and inspection areas. Site features that are present but not required to be inspected are shown in italic font. Observations from previous inspections that are currently monitored are shown in blue text, and new observations identified during the 2020 annual inspection are shown in red. Inspection results and recommended maintenance activities associated with site surveillance features are described in the following subsections. Photographs to support specific observations are identified in the text and in Figure 6-1 by photograph location (PL) numbers. The photographs and photograph log are presented in Section 6.10.

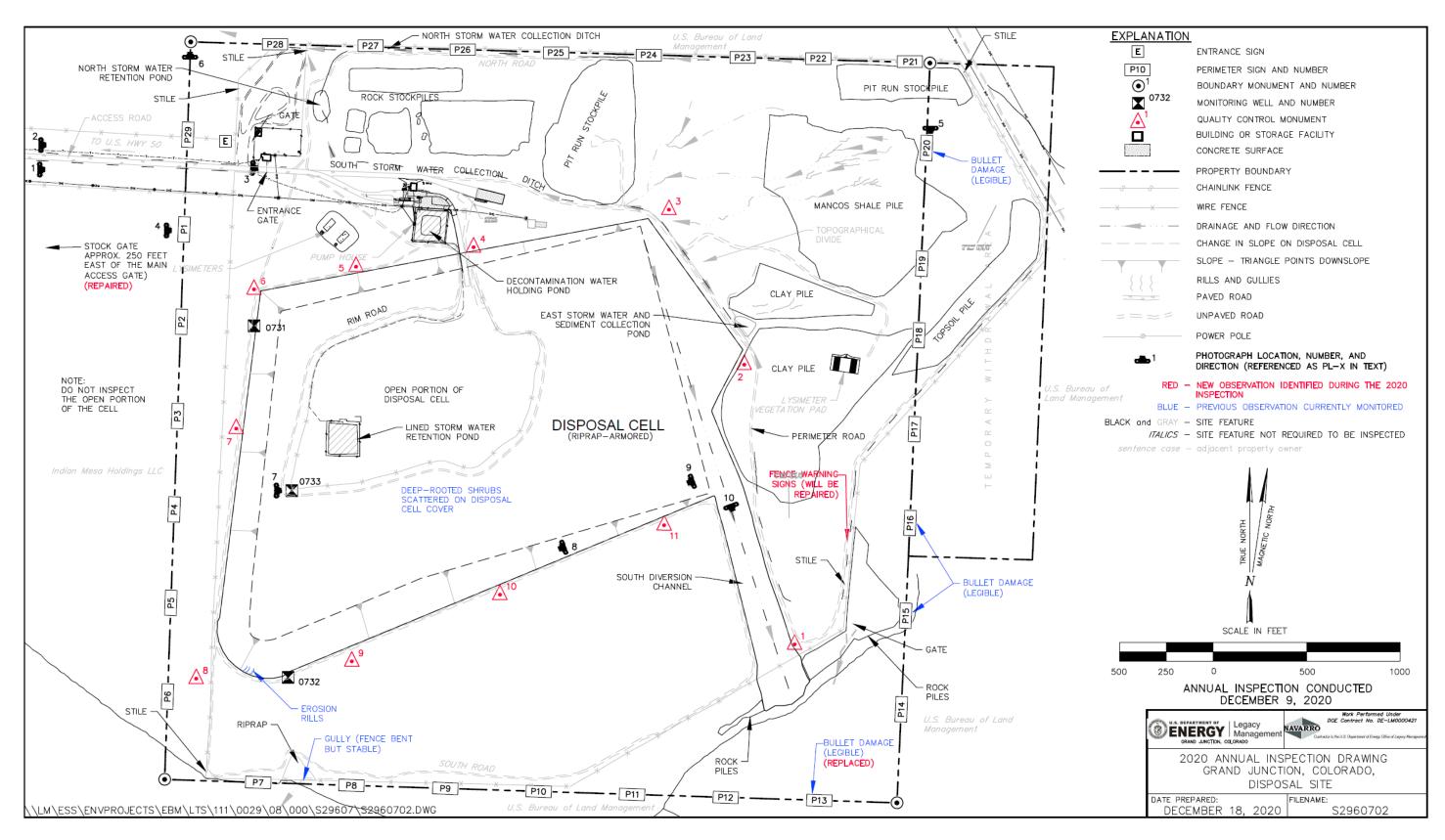


Figure 6-1. 2020 Annual Inspection Drawing for the Grand Junction, Colorado, Disposal Site

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6.4.1.1 Access Road, Entrance Gates, and Entrance Signs

Access to the site is from U.S. Highway 50 by a right-of-way grant on federal land that is administered by the U.S. Bureau of Land Management (BLM). There is a steel double-swing access gate (PL-1) along the highway right-of-way fence providing access within the BLM-administered right-of-way. The access gate (PL-2) is secured by a locking device that was locked and functional at the time of the inspection. LM is one of several parties with access to the locking device.

Although it is not required by the Interim LTSP, LM maintains the site access road and associated right-of-way. A stock gate, east of the access gate was found open and damaged. The gate was repaired following the 2020 inspection.

The site entrance gate was locked and functional, and site entrance signs on and next to the entrance gate were in good condition (PL-3). No immediate maintenance needs were identified.

6.4.1.2 Perimeter Fence and Signs

A perimeter fence encloses the disposal cell features and operations areas. It consists of a standard four-strand, barbed-wire fence in some areas and a woven wire fence topped with barbed wire in others. The perimeter fence does not match the property boundary in several areas. There are 29 perimeter signs attached to steel posts set in concrete positioned at regular intervals along the property boundary (PL-4). Perimeter sign P13, previously reported with bullet damage, was replaced. Perimeter signs P15, P16, and P20 have bullet damage but remain legible (PL-5). In addition to the perimeter signs, the perimeter fence also has warning signs ("No Trespassing" and "Controlled Area" signs). Several warning signs on the perimeter fence near the stile east of the south diversion channel are damaged and will be repaired during the next routine site maintenance event. No immediate maintenance needs were identified.

6.4.1.3 Site Markers

Granite site markers similar to those at other UMTRCA sites will not be installed until the disposal cell is closed.

6.4.1.4 Boundary Monuments

Four boundary monuments delineate the corners of the property boundary (PL-6). All were present and in good condition, and no immediate maintenance needs were identified.

6.4.1.5 Aerial Survey Quality Control Monuments

Eleven aerial survey quality control monuments installed in December 2020 were inspected during the 2020 inspection. No maintenance needs were identified.

6.4.1.6 Monitoring Wells

The groundwater monitoring network consists of three monitoring wells (0731, 0732, and 0733) (PL-7). All wellhead protectors were locked and undamaged, and no immediate maintenance needs were identified.

6.4.2 Inspection Areas

In accordance with the Interim LTSP, the site is divided into four inspection areas to ensure a thorough and efficient inspection. The inspection areas are (1) the closed portion of the disposal cell, (2) diversion structures and drainage channels, (3) the area between the disposal cell and the property boundary or site perimeter fence, and (4) the outlying area. Inspectors examined specific site surveillance features within each area and looked for evidence of erosion, settling, slumping, or other modifying processes that might affect the integrity of the disposal cell and the site's conformance with the Interim LTSP requirements.

6.4.2.1 Closed Portion of the Disposal Cell

The closed portion of the disposal cell is armored with basalt riprap to control erosion (PL-8). The rock showed no significant weathering. There was no evidence of erosion, settling, slumping, rock degradation, or other modifying processes that might affect the integrity of the disposal cell.

Grasses and weeds were growing on most of the disposal cell cover (PL-9). Historically, deep-rooted shrubs on top of the disposal cell have been treated with herbicide. Although treatment is not required by the Interim LTSP, LM plans to continue controlling the deep-rooted shrubs as needed.

During the 2014 annual inspection, several small erosion rills were noted in soils at the base of the disposal cell's southwestern corner. The channels were repaired and covered with gravel following the 2019 inspection. No immediate maintenance needs were identified.

6.4.2.2 Diversion Structures and Drainage Channels

The south diversion channel is a large, riprap-armored structure that intercepts run-on water from offsite and onsite, as well as stormwater runoff from the disposal cell, and conveys the water into a natural drainage that flows away from the site to the southwest (PL-10). Grasses, weeds, and shrubs grow within the diversion channel, but this vegetation is not expected to degrade the channel's performance. The discharge area of the channel is armored with large-diameter basalt riprap.

Other drainage features at the site include north and south stormwater collection ditches, the north stormwater retention pond, and the east stormwater and sediment collection pond. These small drainage features control stormwater runoff primarily from the various stockpiles of disposal cell cover materials. The stormwater collection ditches also capture stormwater run-on from offsite locations. The diversion channel, ditches, and ponds were functioning as designed, and no immediate maintenance needs were identified.

6.4.2.3 Area Between the Disposal Cell and the Site Boundary or Perimeter Fence

There are 11 discrete stockpiles of rock and soil between the disposal cell and the perimeter fence on the north and east sides of the site. Most of these materials eventually will be used to cover and close the open disposal cell. Vegetation and surface rocks generally protect the stockpiles from significant erosion.

Most of the flat areas between the disposal cell and the site (property) boundary are vegetated with native shrubs, scant perennial grasses, and annual weeds. Localized erosion previously reported along the perimeter road near the east stormwater and sediment collection pond have been repaired. Erosion rills on the west side of the perimeter road will continue to be monitored and maintenance performed as necessary. No immediate maintenance needs were identified.

6.4.2.4 Outlying Area

The area beyond the site boundary for 0.25 mile was visually observed for erosion, changes in land use, or other phenomena that might affect the long-term integrity of the site. No such changes were identified. Most of the land surrounding the site is rangeland administered by BLM, and private property on the west side is used primarily for cattle grazing. No land use changes were evident in that area. Outside the site's eastern boundary is a 40-acre area of right-of-way that was issued by BLM to DOE for stockpiled materials. Some of the withdrawal area is included within the site perimeter fence and contains materials stockpiles. This area is not included in the Interim LTSP but is inspected as an offsite area.

6.5 Follow-Up Inspections

LM will conduct follow-up inspections if (1) a condition is identified during the annual inspection or other site visit that requires a return to the site to evaluate the condition or (2) LM is notified by a citizen or outside agency that conditions at the site are substantially changed. No need for a follow-up inspection was identified.

6.6 Maintenance and Repairs

The stock gate that was identified as damaged during the inspection was repaired following the 2020 inspection.

Inspectors identified repairs needed to the southeast perimeter fence warning signs that will be addressed during the next routine site maintenance event. No other immediate maintenance needs were identified.

6.7 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 need for corrective action was identified.

6.8 Groundwater Monitoring

In accordance with the Interim LTSP, LM conducts annual groundwater monitoring as a best management practice. Groundwater at the site qualifies for supplemental standards because it is designated as limited use, a designation given to groundwater that is not a current or potential source of drinking water. The disposal cell is underlain by 5 to 40 feet (ft) of alluvium. Beneath the alluvium is approximately 700 ft of Mancos Shale, which overlies the uppermost aquifer at the site, the Dakota Sandstone. Groundwater in the site area occurs in thin paleochannels within lower portions of alluvium deposits and in the confined Dakota Sandstone unit. Groundwater in

the Dakota Sandstone is designated as limited use because total dissolved solids (TDS) exceed 10,000 milligrams per liter (mg/L). LM monitors groundwater from three monitoring wells adjacent to and in the disposal cell to verify that groundwater in onsite, alluvial paleochannels is not affected by seepage (i.e., transient drainage) from the disposal cell. The most recent sampling event occurred on May 29, 2020.

Monitoring wells 0731 and 0732 are screened within the alluvial paleochannels adjacent to the disposal cell and extend 5 to 7.5 ft into weathered Mancos Shale. The wells were located in two separate paleochannel systems each downgradient from the disposal cell (DOE 1998). Monitoring well 0733 is screened below the paleochannel monitoring wells in the lower tailings in the disposal cell (Table 6-2 and Figure 6-2). Disposal cell construction was initiated by excavating Mancos Shale, which resulted in the base of the disposal cell being below the weathered Mancos Shale horizon. Monitoring well 0733 is primarily used to measure water levels within the disposal cell. All groundwater monitoring results for the site are reported and published on the LM Geospatial Environmental Mapping System (GEMS) website (https://gems.lm.doe.gov/#site=GRJ).

Table 6-2. Groundwater Monitoring Network at the Grand Junction, Colorado, Disposal Site

Monitoring Well	Hydrologic Relationship
0731	Paleochannel, downgradient, edge of disposal cell, north side
0732	Paleochannel, downgradient, edge of disposal cell, south side
0733	Disposal cell, deepest location, downgradient, center



Figure 6-2. Groundwater Monitoring Network for the Grand Junction, Colorado, Disposal Site

6.8.1 Groundwater-Level Monitoring

Static water level measurements are obtained from each monitoring well before water quality samples are collected (Figure 6-3). Water levels in disposal cell monitoring well 0733 generally increased approximately 4 ft since 1998 and has remained lower than the adjacent water levels in the two paleochannel monitoring wells. Groundwater levels in wells 0731 and 0732 remained relatively constant with the same apparent trend in variability, suggesting the two paleochannel systems are influenced by the same upgradient recharge mechanisms. The 2020 sampling occurred in late May, whereas every previous sampling since 2003 occurred in August or early September. Consequently, water level measurements in 2020 may have a seasonal influence in relation to the historical data.

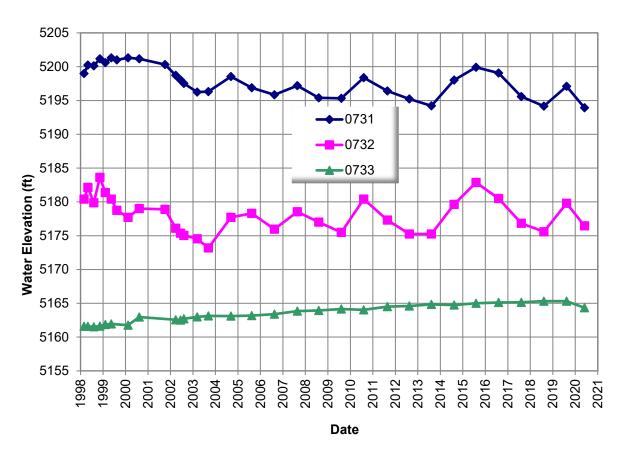


Figure 6-3. Water Level Measurements at the Grand Junction, Colorado, Disposal Site

6.8.2 Groundwater Quality Monitoring

Annual groundwater samples are analyzed for standard field parameters and the following indicator analytes: molybdenum, nitrate, polychlorinated biphenyls, selenium, sulfate, TDS, uranium, and vanadium. Key indicator analytes are molybdenum, nitrate, selenium, and uranium. The U.S. Environmental Protection Agency has established maximum concentration limits (MCLs) for these analytes in groundwater (Table 6-3) (40 CFR 192 Table 1 Subpart A). Monitoring results are compared to the MCLs for evaluation only and not for compliance purposes.

Table 6-3. Maximum Concentration Limits for Groundwater at the Grand Junction, Colorado, Disposal Site

Constituent	MCL ^a (mg/L)
Molybdenum	0.1
Nitrate (as nitrogen)	10
Selenium	0.01
Uranium	0.044

Note:

Molybdenum concentrations in all three monitoring wells have remained steady since 1998; 2020 concentrations were less than or equal to 0.003 mg/L. Time-concentration plots from 1998 through 2020 for the other key indicator analytes—nitrate (as nitrogen), selenium, and uranium—are shown in Figure 6-4 through Figure 6-6.

Nitrate (as nitrogen) concentrations in disposal cell monitoring well 0733 continued to decline from 96 mg/L in 1998 to 0.8 mg/L in 2020, significantly below the MCL of 10 mg/L (Figure 6-4). Nitrate concentrations continued to exceed the MCL of 10 mg/L in the paleochannel monitoring wells 0731 and 0732. Concentrations in monitoring wells 0731 and 0732 increased slightly in 2020, with the concentration in monitoring well 0732 remaining near the historic high value, which is just above 50 mg/L.

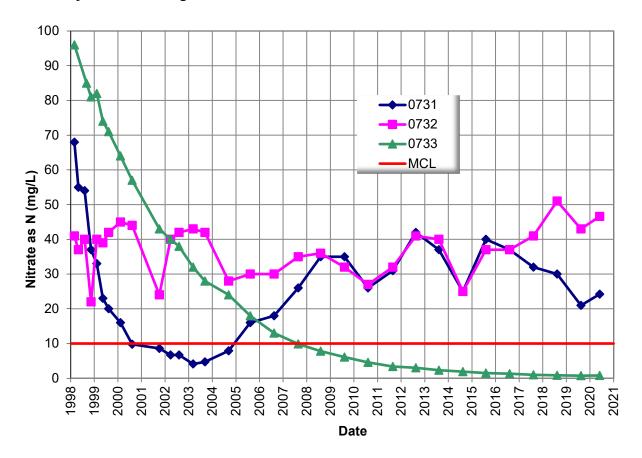


Figure 6-4. Nitrate (as Nitrogen) in Groundwater at the Grand Junction, Colorado, Disposal Site

^a MCLs as listed in 40 CFR 192 Table 1 Subpart A.

Selenium concentrations continued to exceed the MCL of 0.01 mg/L in the paleochannel monitoring wells 0731 and 0732 (Figure 6-5). Selenium occurs naturally in the Mancos Shale deposits that underlie the disposal cell at concentrations slightly greater than the MCL of 0.01 mg/L. Paleochannel monitoring wells 0731 and 0732 are screened at the Mancos Shale unconsolidated soil contact with the alluvium. Background groundwater quality in these wells is brackish, with elevated TDS levels ranging from 870 to 7010 mg/L; this supports the theory that the shale is the source of the elevated selenium concentrations in both paleochannel monitoring wells. Disposal cell monitoring well 0733 is not screened in the weathered Mancos and selenium concentrations remain below the MCL.

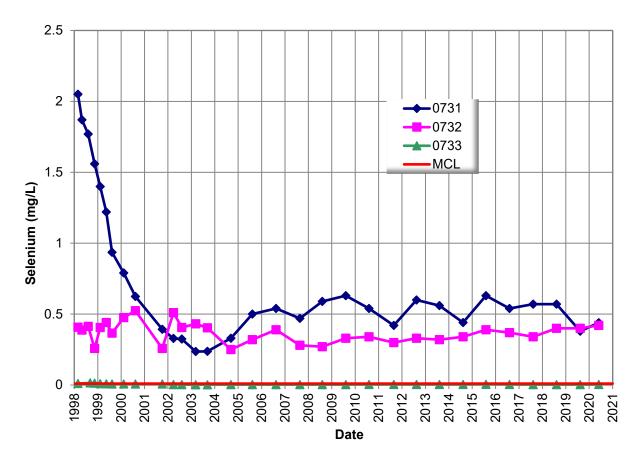
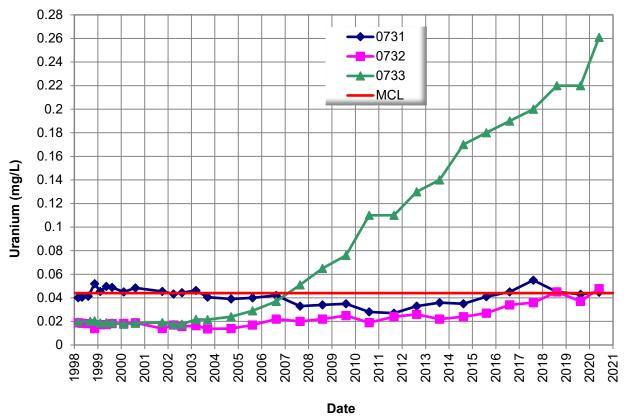


Figure 6-5. Selenium in Groundwater at the Grand Junction, Colorado, Disposal Site

Uranium concentrations in groundwater remained near the MCL of 0.044 mg/L in both paleochannel monitoring wells in 2020. Uranium concentrations in wells 0731 and 0732 have shown a gradual, apparent increasing trend since 2011 (Figure 6-6). Uranium concentrations in disposal cell monitoring well 0733 have increased from 0.02 mg/L in 2002 to 0.26 mg/L in 2020. Relatively high concentrations of uranium and other constituents are expected for a well screened in the disposal cell tailings. Constituents of concern and water levels in well 0733 are not subject to compliance goals and are monitored solely for information gathering purposes.



Note: Well 0733 is screened in the disposal cell tailings and is not subject to compliance goals.

Figure 6-6. Uranium in Groundwater at the Grand Junction, Colorado, Disposal Site

6.9 References

10 CFR 40.27. U.S. Nuclear Regulatory Commission, "General License for Custody and Long-Term Care of Residual Radioactive Material Disposal Sites," *Code of Federal Regulations*.

40 CFR 192. U.S. Environmental Protection Agency, "Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings," *Code of Federal Regulations*.

40 CFR 192 Table 1 Subpart A. U.S. Environmental Protection Agency, "Maximum Concentration of Constituents for Groundwater Protection," *Code of Federal Regulations*.

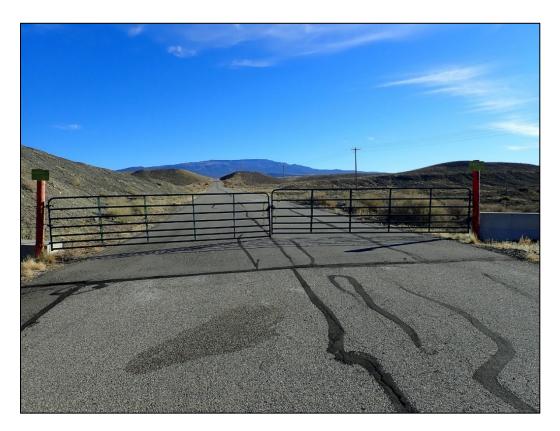
DOE (U.S. Department of Energy), 1998. *Interim Long-Term Surveillance Plan for the Cheney Disposal Site Near Grand Junction, Colorado*, DOE/AL/62350-243, Rev. 1, Environmental Restoration Division, UMTRA Project Team, Albuquerque, New Mexico, April.

6.10 Photographs

Photograph Location Number	Azimuth	Photograph Description
PL-1	90	Site Access Gate
PL-2	90	Site Access Gate Signs
PL-3	95	Solar-Powered Site Entrance Gate
PL-4	90	Perimeter Sign P1
PL-5	180	Perimeter Sign P20 with Bullet Damage
PL-6	_	Boundary Monument BM-1
PL-7	90	Monitoring Well 0733
PL-8	250	South Slope of Disposal Cell
PL-9	250	South Side of Disposal Cell
PL-10	160	South Diversion Channel

Note:

^{— =} Photograph taken vertically from above.



PL-1. Site Access Gate



PL-2. Site Access Gate Signs



PL-3. Solar-Powered Site Entrance Gate



PL-4. Perimeter Sign P1



PL-5. Perimeter Sign P20 with Bullet Damage



PL-6. Boundary Monument BM-1



PL-7. Monitoring Well 0733



PL-8. South Slope of Disposal Cell



PL-9. South Side of Disposal Cell



PL-10. South Diversion Channel

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