

11.0 Maybell, Colorado, Disposal Site

11.1 Compliance Summary

The Maybell, Colorado, Uranium Mill Tailings Radiation Control Act (UMTRCA) Title I Disposal Site (site) was inspected on September 3, 2020. No changes were observed on the disposal cell or in the associated drainage features. Inspectors identified several minor maintenance needs but found no cause for a follow-up inspection. Groundwater monitoring is not required.

11.2 Compliance Requirements

Requirements for the long-term surveillance and maintenance of the site are specified in the site-specific Long-Term Surveillance Plan (LTSP) (DOE 2008) in accordance with procedures 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 11-1 lists these requirements.

Table 11-1. License Requirements for the Maybell, Colorado, Disposal Site

Requirement	LTSP	This Report	10 CFR 40.27
Annual Inspection and Report	Sections 3.3 and 3.4	Section 11.4	(b)(3)
Follow-Up Inspections	Section 3.5	Section 11.5	(b)(4)
Maintenance	Section 3.6	Section 11.6	(b)(5)
Emergency Measures	Section 3.6	Section 11.7	(b)(5)
Environmental Monitoring	Section 3.7	Section 11.8	(b)(2)

11.3 Institutional Controls

The 251-acre site, identified by the property boundary shown in Figure 11-1, is owned by the United States and was accepted under the NRC general license in 1999. The U.S. Department of Energy (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 (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 sign, perimeter fence and perimeter (warning) signs, site markers, and survey and boundary monuments.

11.4 Inspection Results

The site, 25 miles west of Craig, Colorado, was inspected on September 3, 2020. The inspection was conducted by J. Cario and B. Mays of the Legacy Management Support contractor. J. Nguyen (Office of Legacy Management [LM] site manager) and J. Doebele (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, identify changes in conditions that might affect conformance with the LTSP, and evaluate the need, if any, for maintenance or additional inspection and monitoring.

11.4.1 Site Surveillance Features

Figure 11-1 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 included in the following subsections. Photographs to support specific observations are identified in the text and in Figure 11-1 by photograph location (PL) numbers. The photographs and photograph log are presented in Section 11.10.

11.4.1.1 Access Road, Entrance Gate, and Entrance Sign

Access to the site is from the gravel-surfaced Moffat County Road 53, which runs north from U.S. Highway 40 approximately 8 miles east of Maybell, Colorado. County Road 53 ends at an unlocked gate near the northeast corner of the site (approximately 3 miles from the highway). The road continues west as a dirt two-track road directly north of the site. From the end of County Road 53 to the site entrance gate (and beyond, to the UMRCA Title II Maybell West, Colorado, Disposal Site), LM is responsible for road maintenance under a U.S. Bureau of Land Management right-of-way permit. Entrance to the site is through two locked, metal stock gates in the perimeter fence. One is the entrance gate, which is adjacent to the site marker and entrance sign (PL-1). The second gate is between perimeter signs P3 and P4 in the northwest corner of the property. Both gates were locked and functional. The entrance sign is near the entrance gate and is mounted on a T-post in the perimeter fence. The entrance sign has bullet damage but remains legible. No maintenance needs were identified.

11.4.1.2 Perimeter Fence and Signs

To facilitate land management by LM, a four-strand barbed-wire perimeter fence encloses the disposal cell, drainage structures, and much of the site. The site is in wintering grounds frequented by big-game animals (primarily pronghorn, deer, and elk) and is also surrounded by open range used to graze cattle. As a result, minor damage to the perimeter fence periodically occurs. Perimeter fence strands were broken in two locations (PL-2) near perimeter sign P1, and a loose T-post was observed along the perimeter fence near perimeter sign P7. Damage to the perimeter fence was repaired on September 21, 2020.

There are 26 perimeter signs. On the north, west, and south sides of the site, perimeter signs are attached to T-posts in the perimeter fence. On the east side of the site, perimeter signs are attached to steel posts set in concrete and are inside the property boundary approximately midway between the disposal cell and the perimeter fence (PL-3). Several of the perimeter signs along the dirt road north and west of the site (P5, P6, P8, P11, and P26) have bullet damage but remain legible. Perimeter sign P25 was observed to be damaged (PL-4) and was replaced on September 21, 2020. No other maintenance needs were identified.

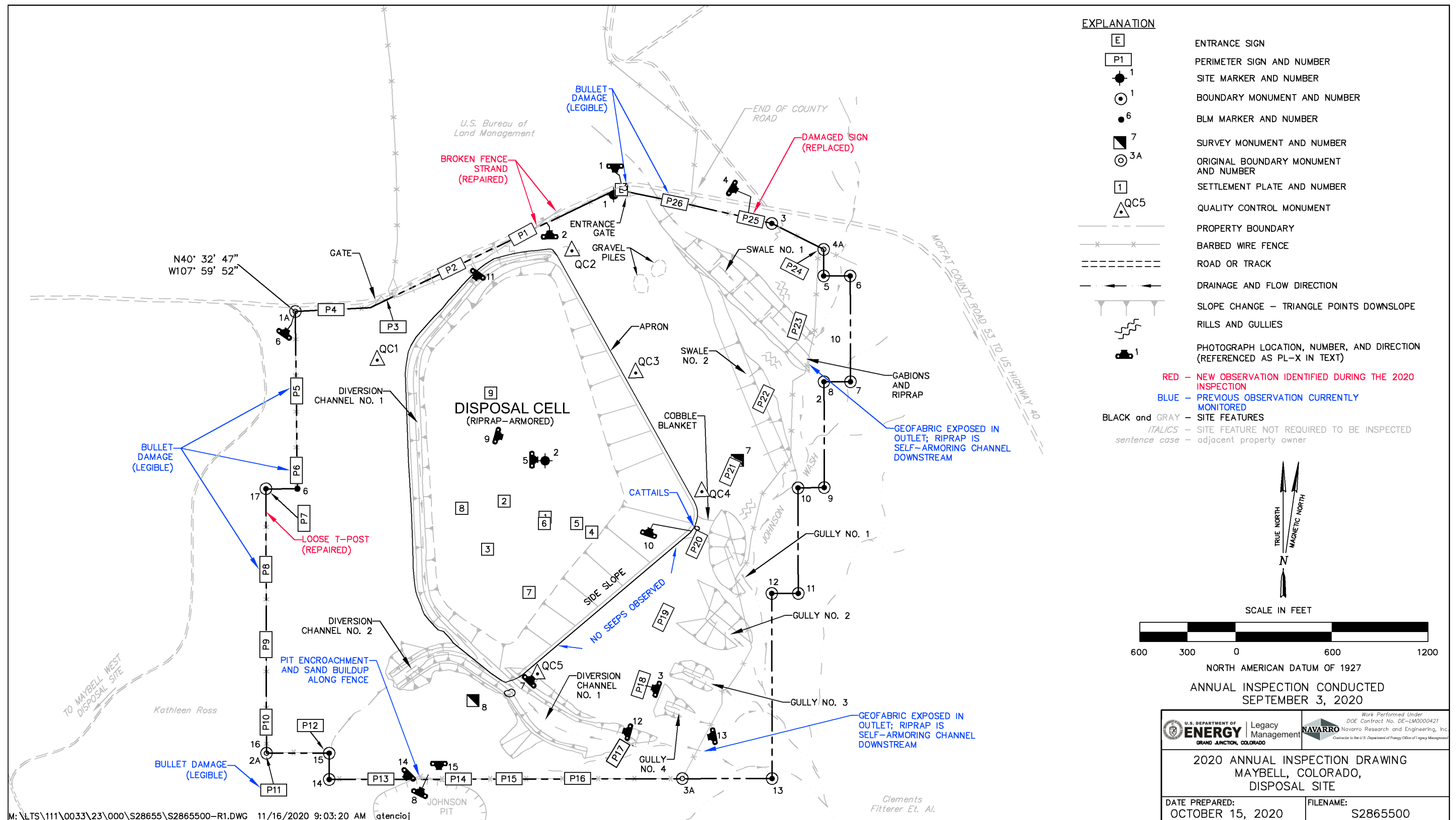


Figure 11-1. 2020 Annual Inspection Drawing for the Maybell, Colorado, Disposal Site

This page intentionally left blank

11.4.1.3 Site Markers

The site has two granite site markers. Site marker SMK-1 is just inside the entrance gate, and site marker SMK-2 is on the top slope of the disposal cell (PL-5). No maintenance needs were identified.

11.4.1.4 Survey and Boundary Monuments

The site has two survey monuments. Survey monument SM-7 is on the bench above Johnson Wash just north of perimeter sign P21, and survey monument SM-8 is south of the disposal cell on the bench above Diversion Channel No. 2. The two survey monuments were not inspected during the inspection but were confirmed to be present and intact during a previous site visit. Seventeen boundary monuments delineate the property boundary (PL-6). No maintenance needs were identified.

11.4.1.5 Aerial Survey Quality Control Monuments

Five aerial survey quality control monuments, installed in 2018, were inspected during the 2020 inspection (PL-7). No maintenance needs were identified.

11.4.2 Inspection Areas

In accordance with the LTSP, the site is divided into three inspection areas (referred to as “transects” in the LTSP) to ensure a thorough and efficient inspection. The inspection areas are (1) the disposal cell, (2) other areas inside the site boundary, and (3) the outlying area. Inspectors examined the specific site surveillance features within each area and looked for evidence of erosion, settling, slumping, or other modifying processes that might affect the site’s conformance with LTSP requirements.

11.4.2.1 Disposal Cell

The disposal cell, completed in 1998, occupies 66 acres. The disposal cell is armored with riprap to control erosion and deter animal and human intrusion (PL-8). There was no evidence of erosion, settling, slumping, rock degradation, or other modifying processes that might affect the integrity of the disposal cell. Scattered shallow-rooted plants continue to establish on the disposal cell top and side slopes (PL-9); these plants do not affect the integrity of the cell. Deep-rooted plants and noxious weeds are controlled as required by the LTSP.

In accordance with the LTSP, inspectors looked for seeps on the east and southeast side slopes of the disposal cell, because slimes were encapsulated in this portion of the cell. No seeps were observed at the toe of the disposal cell in these areas. Cattails continue to grow at the toe of the east corner of the disposal cell, indicating the presence of moisture (PL-10). Stormwater runoff from the disposal cell discharges at this location, and standing water has been observed in this area during past inspections; no standing water was noted during the 2020 inspection. A 2003 laboratory analysis of evaporite minerals from this location confirmed that no constituents attributable to the disposal cell contents were present. No other maintenance needs were identified.

11.4.2.2 Other Areas Inside the Site Boundary

The surface conditions at the site are a combination of rock-armored drainage and diversion channels, along with contouring of soil surfaces to achieve the necessary surface water drainage control to protect the disposal cell from erosion. The rock-armored diversion channels, swales, and gullies are performing as designed (PL-11 and PL-12). Erosion directly downgradient of the outlets of Diversion Channel No. 1 and Swale No. 1 that has exposed the underlying geofabric had not changed significantly (PL-13). Riprap placed within the outlets continues to provide protection against headcutting. Minor rills adjacent to Swale No. 1 and Gully No. 1 continue to stabilize due to natural armoring and increased vegetation growth. Minor erosion on the northern portion of the site directly downslope of the perimeter fence (between perimeter signs P1 and P2) continues to stabilize. Minor erosion perpendicular to the perimeter fence near boundary monument BM-3 was observed. These occurrences of erosion do not threaten the disposal cell, and there was no evidence of sediment moving offsite into Johnson Wash. No maintenance needs were identified.

11.4.2.3 Outlying Area

The area beyond the site boundary for a distance of 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 impacts were observed.

Directly south of the site is a former open-pit uranium mine known as the Johnson Pit (PL-14). Over time, slumping of the pit wall resulted in the pit encroaching several feet onto property now owned by DOE. This encroachment presents no threat to the integrity of the disposal cell and occurred before reclamation and transfer of the site to DOE for long-term surveillance and maintenance. This encroachment is visually monitored annually; it is periodically documented with photographs to assess whether there is any further slumping of the pit wall and to verify the integrity and functionality of the perimeter fence. There was no evidence of any additional encroachment of the pit onto the site at the time of the inspection. However, windblown sand continues to accumulate along the northern crest of the pit wall along the perimeter fence line (PL-15). The perimeter fence remains functional, but continued accumulation of sand will require vertically extending the fence or removing the sand. Inspectors will continue to monitor this area. No immediate maintenance needs were identified.

11.5 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.

11.6 Maintenance

Inspectors documented minor maintenance needs that were completed following the inspection, including:

- Spraying noxious weeds and deep-rooted plants on the disposal cell
- Replacing perimeter sign P25
- Repairing loose T-post south of perimeter sign P7 along the western perimeter fence
- Repairing broken fence strands east of perimeter sign P1 along the northern perimeter fence

No other immediate maintenance needs were identified.

11.7 Emergency Measures

In compliance with the LTSP, emergency measures are the actions that LM will take in response to unusual damage or disruption that threatens or compromises site safety, security, or integrity. No need for emergency measures was identified.

11.8 Environmental Monitoring

11.8.1 Groundwater Monitoring

In accordance with the LTSP, groundwater monitoring is not required. Supplemental standards have been applied to site groundwater because it is designated as limited use, a designation given to groundwater that is not a current or potential source of drinking water. Groundwater in the uppermost aquifer is designated as limited use because it contains widespread ambient contamination that cannot be cleaned up by treatment methods reasonably employed in public water systems (40 CFR 192.11[e]). There are no current or future uses of the uppermost aquifer in the area. Water level monitoring did not detect disposal-cell-related impacts to the groundwater system, such as transient drainage downgradient of the cell, and NRC concurred that stipulated groundwater level monitoring requirements had been satisfied (Janosko 2005). Therefore, no further groundwater monitoring was required.

11.8.2 Vegetation Monitoring

In accordance with the LTSP, annual visual inspections are conducted to verify the continued health of the onsite vegetation and to ensure that undesirable plant species (deep-rooted plants on the disposal cell cover and noxious weeds) do not proliferate on the site. Minor occurrences of noxious weeds and deep-rooted plants were noted on the disposal cell during the inspection. Annual noxious weed treatment will continue. Following reclamation, the disturbed soil surfaces on the site were revegetated with a mix of native and adaptive grasses to provide soil stability. These revegetated areas appeared to be healthy, with similar diversity and density as the surrounding non-disturbed areas.

11.9 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*.

DOE (U.S. Department of Energy), 2008. *Long-Term Surveillance Plan for the Maybell, Colorado (UMTRCA Title I) Disposal Site, Moffat County, Colorado*, DOE-LM/1605-2008, Revision 4, April.

Janosko, G.S., 2005. Gary S. Janosko, chief of Fuel Cycle Facilities Branch, U.S. Nuclear Regulatory Commission, letter (about decommissioning of monitor wells at the Maybell, Colorado, Uranium Mill Tailings Radiation Control Act [UMTRCA] Title I Disposal Site) to Michael Tucker, site manager, U.S. Department of Energy, January 5.

11.10 Photographs

Photograph Location Number	Azimuth	Photograph Description
PL-1	180	Entrance Sign
PL-2	0	Broken Fence Strands Along Northern Perimeter Fence
PL-3	290	Perimeter Sign P18
PL-4	120	Damaged Perimeter Sign P25
PL-5	90	Site Marker SMK-2
PL-6	35	Original Boundary Monument BM-1A
PL-7	45	Quality Control Monument QC5
PL-8	25	Disposal Cell
PL-9	105	Vegetation on Top Slope of Disposal Cell
PL-10	20	Cattails Adjacent to Disposal Cell Toe Slope and Apron
PL-11	215	Diversion Channel No. 1 and North Side Slope of Disposal Cell
PL-12	285	Diversion Channel No. 1
PL-13	260	Perimeter Fence near Outlet to Diversion Channel No.1
PL-14	225	Sand Accumulation Around Perimeter Fence with Johnson Pit in Background
PL-15	180	Sand Accumulation Around Perimeter Fence near Johnson Pit



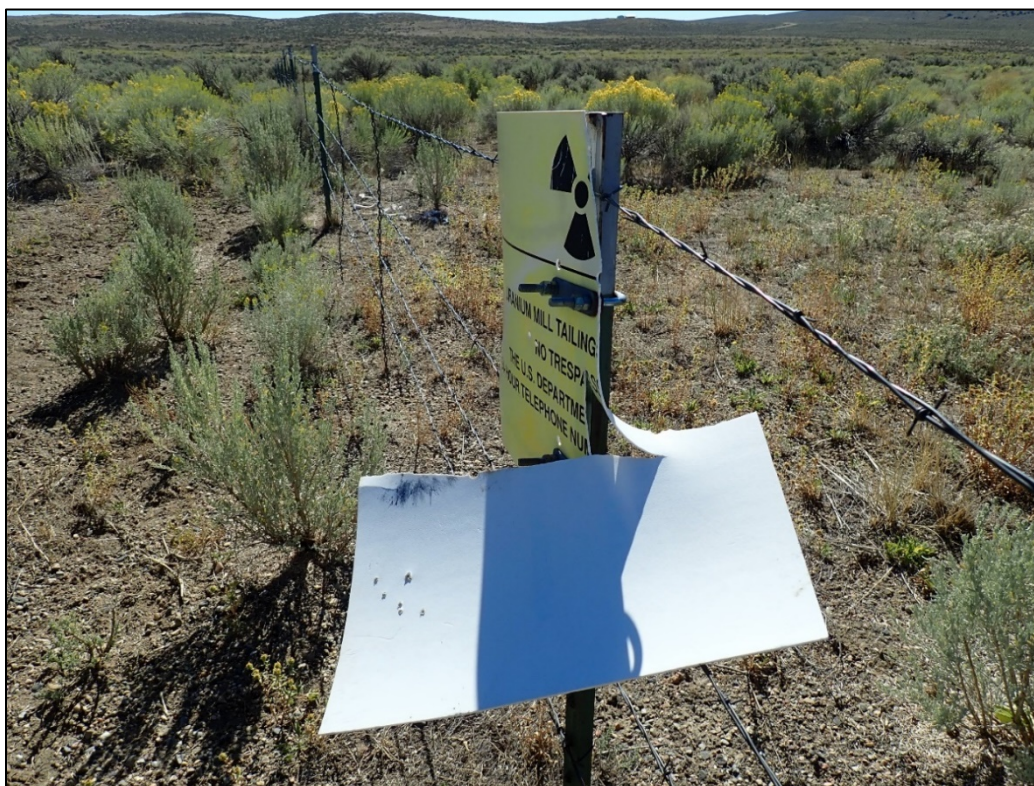
PL-1. Entrance Sign



PL-2. Broken Fence Strands Along Northern Perimeter Fence



PL-3. Perimeter Sign P18



PL-4. Damaged Perimeter Sign P25



PL-5. Site Marker SMK-2



PL-6. Original Boundary Monument BM-1A



PL-7. Quality Control Monument QC5



PL-8. Disposal Cell



PL-9. Vegetation on Top Slope of Disposal Cell



PL-10. Cattails Adjacent to Disposal Cell Toe Slope and Apron



PL-11. Diversion Channel No. 1 and North Side Slope of Disposal Cell



PL-12. Diversion Channel No. 1



PL-13. Perimeter Fence near Outlet to Diversion Channel No.1



PL-14. Sand Accumulation Around Perimeter Fence with Johnson Pit in Background



PL-15. Sand Accumulation Around Perimeter Fence near Johnson Pit