



Department of Energy
Washington, DC 20585

APR 24 1992

Mr. Joseph J. Holonich, Director
Repository Licensing and Quality Assurance
Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Holonich:

As discussed in the November 20, 1991, regulatory strategy meeting between the U.S. Department of Energy (DOE) and the U.S. Nuclear Regulatory Commission (NRC), we are transmitting the enclosed DOE Mined Geologic Disposal System (MGDS) Annotated Outline (AO) Skeleton Text for the Preparation of a License Application, dated April 17, 1992, for your information and to facilitate your guidance to us.

This annotated outline skeleton text is the first in the planned iterative development of the basis for a potential license application, in consultation with NRC. DOE will need guidance during the years prior to license application submittal. The annotated outline is a vehicle that allows NRC to recognize those areas where DOE requires guidance as a potential applicant under 10 CFR Part 60. The usefulness of the AO depends, in large part, on NRC's provision of guidance on this complex and first-of-a-kind activity. The document demonstrates the DOE capability to integrate principles of systems engineering with the site characterization process to produce materials appropriate for use in a licensing process under 10 CFR Part 60. In this sense the MGDS AO is complementary to other major program documents such as the Semiannual Progress Reports.

The Department views this document as the key to providing NRC with DOE's understanding and interpretation of the regulatory requirements, and the implementation of these requirements in our systems engineering and site characterization activities. The document is intended to allow NRC to provide guidance by which DOE can evaluate further systems engineering and site characterization activities. Any changes to the Office of Civilian Radioactive Waste Management Program or AO in response to NRC guidance, will be reflected in subsequent iterations of the MGDS AO and the Semiannual Progress Reports.

The DOE also views the MGDS AO as a mechanism to facilitate active exchanges, both internal and external, for the identification, clarification and resolution of issues in a timely manner so as to

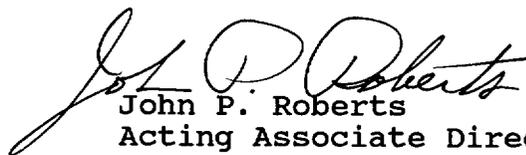
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allow DOE to prepare a license application, if the site is found suitable. In this way, the MGDS AO closes the loop between individual issues and the systems engineering and site characterization activities.

Please note that this annotated outline skeleton text is a contractor controlled document. Therefore, only changes, not the entire document, will be transmitted to you in the future. We plan to transmit the changes for the next iteration to you in September, 1992. Accordingly, your guidance or comments on this iteration would be most useful if provided by the end of May 1992, to enable us to respond in the September iteration. Otherwise, your guidance or comments will be addressed in future iterations. We expect to issue future iterations at approximately six months intervals. Please call Corinne Macaluso of my staff at (202) 586-2837 if you have any questions.

Sincerely,



John P. Roberts
Acting Associate Director for
Systems and Compliance
Office of Civilian Radioactive
Waste Management

Enclosure: *All enclosure on shelf*

Mined Geologic Disposal System (MGDS) Annotated Outline Skeleton Text for the Preparation of a License Application, April 17, 1992 (25 copies)

cc: w/enclosure

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