



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 23, 1990

Note to: J. Linehan

From: R. Ballard

Subject: Review of CNWRA Report "Identification and Evaluation of Regulatory and Institutional Uncertainties in 10 CFR Part 60"

At your request, I have had various staff review and comment upon specific regulatory uncertainty rationales presented in the subject report. We have limited our review to those portions of the report indicated in your note.

Although commenting on different areas, the individual staff comments generally fall into three categories. These are: (1) incomplete explanations of uncertainties, (2) uncertainties that appear to actually be recommendations for substantive changes to regulatory requirements, and (3) potential uncertainties not identified in the report.

Furthermore, individuals have not identified any areas in which they disagree with the comments prepared by either OGC or other DHLWM staff. However, J. Trapp has some specific comments directed toward the previously prepared comments. These are included in his comment package.

By way of a general observation, the uncertainty rationales appear to be developed in a manner that cannot be directly related to the criteria (see page 6) used by the CNWRA to identify them. This appears to be a generic deficiency that should be corrected during preparation of the next draft.

Copies of the individual staff comments that are attached have been forwarded to P. Altomare and R. Johnson for their consideration.

Ron Ballard
R. Ballard

Attachments:
As stated

cc: D. Brooks
P. Justus
S. Coplan
P. Altomare
R. Johnson

FULL TEXT ASSEMBLY

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FDR WASTE
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