December 29, 2000

Mr. Arthur Kleinrath, Project Manager
U. S. Department of Energy
Grand Junction Office
2597 B 3/4 Road
Grand Junction, CO 81503

SUBJECT: U.S. DEPARTMENT OF ENERGY - DRAFT GUIDANCE FOR IMPLEMENTING THE LONG-TERM SURVEILLANCE PROGRAM

The NRC staff has reviewed a draft of a revision to "Guidance for Implementing The Long-Term Surveillance Program For UMTRCA Title I and Title II Disposal Sites," dated February, 2000. This document is intended to supercede the 1996 guidance document that only addressed Title I sites. The comments provided below were discussed on several occasions with members of your staff in meetings and by telephone.

Overall, we consider the document to be relatively complete. However, we suggest that Section 2.4.5 be modified to include more specific procedures that will be used to determine if emergency measures should be immediately implemented. In Section 2.4.5, DOE indicates that inspectors will evaluate the problem and make recommendations for the next step. We consider that the recommendations that will be made by DOE to either perform immediate remedial action or to continue evaluating the situation should be based on a detailed evaluation of the adequacy of the damaged feature to perform its intended function. As part of this detailed evaluation, DOE should indicate in Section 2.4.5 that the following specific actions will be undertaken: (1) DOE will assess the design bases governing the adequacy of the damaged site feature and the ability of the site design to control or accommodate the observed problems; (2) DOE will determine the extent of the damage or degradation and will compare existing conditions to design conditions; (3) as necessary, DOE will evaluate the existing conditions to determine if a design basis event can be withstood by the feature in its existing condition; and (4) DOE will provide to NRC (in either the annual report or a separate report) a clear and technically defensible basis for concluding that remedial measures are or are not necessary.

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December 29, 2000

This review was performed by Ted Johnson. If you have any questions, please contact Mr. Johnson at (301) 415-6658.

Sincerely,

/RA/ Dan Gillen for

Philip Ting, Chief
Fuel Cycle Licensing Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards

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