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REPORT TO NRC. RE: NUREG-1804,,,,YM Review Plan for Comment,,,,

To: NRC Staff and Members of Congress,

Again THANKS for sending so much information. We here in Pahrump, Nye County, NV really appreciate that you hold NRC meetings here because YM Is in Nye County. We've been together with your staff going on ten years now....

Enclosed my short report to Darlene Higgs, 6-02-02 and we will be looking forward to more of the comment periods. When will there be an updated NRC licensing criteria report after this one? Congress must wee that you have required some plans, proper science, current, current research, perhaps re-involvement with the Dept. of Interior and their Licensed Mining Engineers for design and ventilation and of course the most important deletion, COST or some estimate or plan since we the public will foot the bills. We'd like to see some kind of a QA plan because of the new NUSS (7/02) standards.

The following are six deletions that might be considered or required or added to DOE's request for licensing.

1. Re: GAO reports 02-373 SP, Wash. DC, (3/02)....A Method of Strategic Human Capital Mgt. The DOE doesn't need a plan for hiring but todays and future recruitment is going to be very difficult. Are they required to learn from successful business that has procedures for success in planning and hiring.... This project will demand only the best scientific people....Right?
2. Of the 293 projects questioned at NWTRB meeting.... What were the 38 that have been Resolved? Where can we get that information?
3. Federal Acquisition Regulations" provide for the (DOE & DOD other government agencies?) reimbursement to their contractors for reasonable legal costs. (2,100 cases involving various types of complaints against DOE contractors) The tax-payers (that's you and me) paid out \$292 million for litigation & disposition (settlement & judgment) costs. "Prudent Business Judgment" is the term GAO uses. 1672 cases from 1995 t0 2001, 444 are still ongoing. \$50 million alone was paid for equal opportunity cases. How much is in the POT if YM blows?

Template = ADM-013

F. RDS = ADM-03
Add = J. Cocco (SAC3)
H. Boranek (AFB)

4. P.3.24 ...Reports: Within ½ hour of the discovery of accidental criticality or any loss of special nuclear material....Also Review Method 3 on page 4.5-94 Review method 1....DOE commitment to....notify off-site response organizations and request off-site assistance....including medical assistance....treatment of contaminated injured on site workers. There is no QA on these medical or engineering emergency problems because there is no "Safety Evaluation" required to obtain licensing. Remember in either direction from YM there is approximately 100 miles between drinks....(my usual funny joke)
5. P 3.34....Acceptance Criteria 2....So happy to see you using some site characterization investigations specific to YM and NTS and their environments. What will DOE & NTS do for scientific testing of the movement of COLLOIDS from NTS to YM? U & PU movements are new science. Will they be in the licensing-protocol? -Also 4.1-63-Review Methods 4...D. Method 4....Who in the Dept. of Interior....Mining engineers are working on this project in the planning stages? I see no mention of MY BUGS....MY BUGS will eat all of DOE's canisters unless a prototype experiment is planned. Microbial Influenced Corrosion is a brand new science....You can't sweep my BUGS under these huge canisters.....
6. p.4.5-7....DOE is not expected to have prepared plans for start up activities etc. at time of licensing....P 6-11 paragraph 2, refers to DOE searching for an Indian Tribe willing to host a repository. Does this infer that DOE does not have title to Area 25 or the small portion of the TTR it might occupy? We are watching SB 958 which Senator Reid introduced that has been on going for 20 years..The Indians still stand by the Ruby Valley Treaty of 1863 which remains before our Supreme Court. Does the Air Force have title? Army?

Looking forward to answers to these questions...Have lots more...As always...Your friend,
but don't forget I remain one of the few lonely L.O. L.'s that really reads these long reports.

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