



NUCLEAR WASTE REPOSITORY PROJECT OFFICE
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August 10, 1994

Robert M. Nelson, Jr.
Acting Project Manager
Yucca Mountain Site Characterization Project Office
P.O. Box 98608
Las Vegas, NV 89191-8608

RE: Planned Yucca Mountain Site Characterization Office (YMSCO) Surface-based Program to Collect Pneumatic Continuity Data

Dear Mr. Nelson:

As you are aware, the question of repository-wide, pre-disturbance pneumatic continuity data continues to be an issue of significant concern to Nye County, as well as to the State of Nevada, the NRC, the USGS, and others involved with the Yucca Mountain Project. Those concerns were the subject of a scientific workshop on the subject which Nye County hosted in January, 1994 in Las Vegas. The proceedings of that workshop have been made available to the Office of Civilian Radioactive Waste Management (OCRWM) and to other interested oversight and regulatory entities.

At the workshop, YMSCO personnel presented some details of an accelerated surface-based testing program which contained a commitment to obtain a minimal amount of pre-disturbance pneumatic continuity data along the planned Tunnel Boring Machine (TBM) route. The accelerated surface-based testing program has been presented several times subsequent to the workshop by YMSCO personnel.

We now understand that YMSCO intends to instrument only holes NRG-6 and NRG-7/7a to accomplish its planned pneumatic continuity program during the winter of 1994-95. An integral part of YMSCO's commitment, we understand, is to slow the TBM's rate of progress, or stop it at certain "hold points", until the necessary pneumatic continuity data is obtained.

Nye County strongly believes that YMSCO's planned pneumatic continuity data gathering effort under the accelerated surface-based testing program along the TBM route should be a more comprehensive undertaking, and that the planned effort is indeed the absolute minimum level which should be considered. The NRC staff, we believe, agrees with this. In that respect I refer you to two letters on this subject from Joe Holonich to Dwight Shelor, both dated June 21, 1994.

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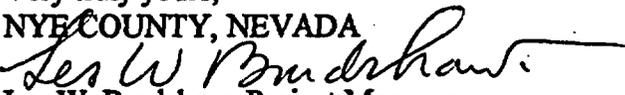
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It now appears that YMSCO will not be in a position to gather meaningful pneumatic continuity data over the coming winter season in advance of TBM passage of bore hole locations NRG-6 and NRG-7/7a because of delays in completing instrumentation in those holes. That raises serious concerns in our minds regarding the adequacy of that aspect of the surface-based testing program, and prompts the following questions:

1. Will NRG 6 and NRG 7/7a be completed, instrumented, and producing data before the TBM advances to those sites?
2. Are DOE and YMSCO still committed to acquiring adequate pre-disturbance pneumatic continuity data before the TBM penetrates the bedded zone, including stopping the TBM at certain "hold points" until that data is gathered?

I look forward to your response on these issues.

Very truly yours,
NYE COUNTY, NEVADA

Les W. Bradshaw, Project Manager
Nye County Nuclear Waste Repository Project

- cc: Nye County Board of Commissioners
William L. Offutt, County Manager
Dan Dreyfus, OCRWM
John Cantlin, NWTRB
Joe Holonich, NRC
Carl Johnson, State of Nevada
Affected Units of Local Government
Nick Stellavato, Nye County On-Site Representative
Stan Sims, Nye County Assistant Project Administrator
Phil Niedzielski-Eichner, Governmental Dynamics, Inc.
Malachy R. Murphy, Lane Powell Spears Lubersky
Martin D. Mifflin, Mifflin & Associates, Inc.