



PLANNING DEPARTMENT

YUCCA MOUNTAIN REPOSITORY ASSESSMENT OFFICE

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County of
INYO

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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
M/S 4H3
Washington, D.C. 20555

Dear Mr. Holonich:

Inyo County would like to go on record as being opposed to the proposed changes to the format and content of the SCP Study Plans by the DOE, as described in their July 8, 1992 letter (Roberts-Holonich). Inyo County, an affected unit of local government under the Nuclear Waste Policy Act as Amended, is approximately fourteen miles from the proposed repository site at Yucca Mountain. As Inyo County is also hydrologically down-gradient from the site, we have specific concerns about the geologic and hydrologic site characterization activities the DOE will perform.

The proposed deletion of reference to QA controls will seriously affect the quality of the review performed by statutory and regulatory oversight agencies, as the implementation of QA controls in the Study Plan activities can only be seen if the controls are cited in the plans. The deletion of both the QA controls and technical procedures is also inconsistent with the DOE's stated goal of ultimately determining both the suitability and the licensability of Yucca Mountain as a repository for High-Level waste. In addition, elimination of the NRC Phase I Review seems guaranteed to encourage "activities that ... could cause significant and irreparable adverse effects on the site". Inyo County is specifically concerned with boreholes through the repository

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horizon to the saturated zone. We consider the potential for creation of a migration path to the aquifer to be great, but have been unable to generate any concern on the DOE's part for this potential disqualifier.

Continued review of detailed Study Plans by the NRC and affected parties is crucial to a site characterization program that is both scientifically and publicly acceptable.

Sincerely,



Brad Mettam
Project Coordinator