



**Department of Energy**  
Yucca Mountain Site Characterization  
Project Office  
P. O. Box 98608  
Las Vegas, NV 89193-8608

WBS 1.2.13.3.3  
QA: N/A

AUG 09 1993

Robert R. Loux  
Executive Director  
Agency for Nuclear Projects  
State of Nevada  
Evergreen Center, Suite 252  
1802 North Carson Street  
Carson City, NV 89710

ADMINISTRATIVE PROCEDURE (AP) 8.1, LAND ACCESS AND ENVIRONMENTAL COMPLIANCE APPROVAL PROCESS (SCP: N/A)

Reference: Ltr, Loux to Gertz, dtd 7/6/93

Your letter of July 6, 1993, suggests that we have not provided you with the AP-8.1 files in sufficient time for you to track site characterization activity disturbance to the environment. The AP-8.1 process was not intended for that purpose. We will, however, add Dr. C. R. Malone to the list of individuals who receive copies of the AP-8.1 approval letter that is issued to the responsible Division Director. My letter of January 21, 1993, indicated that Dr. Malone would be added to the list of people receiving project-controlled environmental program documents. With the addition of the AP-8.1 approval letter, this will provide you with the information of approval of activities in a timely manner.

The approval letters or any supporting reference materials are not controlled documents. The six Field Change Requests (FCRs) to which your letter referred were issued as controlled documents because they are making changes to the job packages which are also issued as controlled documents. All six of the FCRs were approved prior to November 1, 1992, and have either added the AP-8.1 approval letter with environmental stipulations or changes to the environmental stipulations to the job package. By adding Dr. Malone to the distribution of the AP-8.1 approval letter, it will not be necessary for you to acquire the FCRs.

The AP-8.1 files are not controlled documents. We believe you are confusing the controlled document system and the records information system. The documents generated by AP-8.1 are submitted to the records system. These records are not quality records.

179137

YMP-6

9308180100 930809  
PDR WASTE  
WM-11 PDR

102.8  
WM-11  
NHDZ 1/0

AUG 09 1993

Robert R. Loux

-2-

We wish to clarify that the AP-8.1 information is not intended to become an Environmental Impact Statement baseline. The AP-8.1 process is intended to identify and minimize any environmental impacts resulting from site characterization activities. If the U.S. Nuclear Regulatory Commission has need of the environmental information, it will be in the records system.

We believe the AP-8.1 process is structured, sufficient, and consistent, and we are continuing to improve the environmental compliance and land access process. If you have any questions, please call Wendy R. Dixon at (702) 794-7947.

  
Carl P. Gertz  
Project Manager

POCD:WRD-5386

cc:

J. B. Youngblood, NRC, Washington, DC