

FCRG/STEIN

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JAN 16 1990

Mr. Ralph Stein, Associate Director
for Systems Integration and Regulations
Office of Civilian Radioactive Waste Management
U. S. Department of Energy, RW 30
Washington, D.C. 20545

Dear Mr. Stein:

This letter is in response to the U.S. Department of Energy's (DOE's) letter of December 14, 1989, commenting on the Table of Contents (TOC) of the draft Format and Content Regulatory Guide for the License Application for the High-Level Waste Repository (FCRG). The staff appreciates your comments and has responded below to each of the concerns expressed in the letter.

First, DOE suggested adding a list of the design criteria and more specific and quantitative criteria for the natural system (to be developed by DOE) to the Safety Analysis Report (SAR). As DOE acknowledged in its letter, the FCRG is being developed to one or more additional levels of detail by the staff. Presently the staff plans to issue the complete FCRG for public comment in the Spring of 1990. Once DOE has reviewed the additional information contained in the detailed chapters it may find that it is unnecessary to add a separate list to the FCRG. If, however, after reviewing the public comment draft, DOE still believes that more detail is necessary, the staff would welcome your comments and suggested changes.

The staff agrees with your comment that it is beneficial to combine the SAR and the general information in a single document. This is in accordance with 10 CFR 60.21(a), which states that both general information and the SAR are parts of the License Application (LA). It should be noted that the delineation between the general information and the SAR in the LA has been made clearer in the draft FCRG.

The third comment in the DOE letter was that the level of detail of the TOC did not make it possible to determine if all of the necessary information would be included in the FCRG. DOE provided as examples eleven topics. Having reviewed the text of the draft FCRG, the staff has confirmed that it addresses each of those topics.

In response to the final DOE comment, the draft FCRG clearly addresses favorable conditions and the mitigating effects that favorable conditions may have on potentially adverse conditions in Section 5 of Chapter 5. Also note that Chapter 4 has been revised and that the term Repository Induced Phenomena has been eliminated.

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Based on the information discussed above, the staff believes that it has acceptably responded to all of the concerns about the FCRG expressed by DOE. The staff looks forward to your review and comment on the draft FCRG when it is issued this spring. If you have any questions about the information in this letter or on any other aspect of the FCRG, please contact Mark Delligatti, the FCRG Project Manager at 492-0430.

Sincerely,

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John J. Linehan, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-level Waste Management
Office of Nuclear Material Safety
and Safeguards

- cc: R. Loux, State of Nevada
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