

LETTER ON IAEA DOCUMENT

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APR 27 1990

Mr. Carl Cooley
Office of Environmental Restoration and
Waste Management (EM-55)
U.S. Department of Energy
Washington, D.C. 20545

Dear Mr. Cooley:

SUBJECT: NRC COMMENTS ON IAEA DOCUMENT "LONG-TERM ASSESSMENT OF WASTE
DISPOSAL SYSTEMS"

I am providing the U.S. Department of Energy (DOE) with the following general comments prepared by the U.S. Nuclear Regulatory Commission (NRC) staff on Chapter 8 of the International Atomic Energy Agency's (IAEA's) radioactive waste management source book, "Long-Term Assessment of Waste Disposal Systems," which was sent to DOE by IAEA in a letter dated March 21, 1990.

The NRC staff recognizes the importance of public understanding of radioactive waste disposal programs, including the approach for predicting repository performance over long time periods. However, we are unable to support the draft document for two reasons. First, some statements in the document are technically unsupportable, such as the discussion on page 8.12 regarding the ease of obtaining relevant data for testing models on pitting corrosion. Second, we have a fundamental objection to the document as a whole because it duplicates efforts underway at the Organization for European Cooperation and Development's Nuclear Energy Agency (NEA) to develop an international consensus document on long-term safety assessment of high-level waste repositories, the "Collective Opinion on Safety Assessment."

NRC's resources for international activities are limited, and we cannot support redundant activities by IAEA and NEA. Cognizant staff of both of these organizations are aware of this. As you know, NRC has been participating in the NEA's high-level waste disposal activities, both by providing an NRC staff member to the U.S. delegation for meetings of the Radioactive Waste Management Committee, and by participating in subgroups of this Committee. For example, NRC is a participating member of the NEA's Performance Assessment Advisory Group (PAAG). We believe the appropriate forum for NRC to provide comments on long-term performance assessments of high-level waste disposal systems is through the PAAG.

We would note that NEA has provided IAEA with the current draft of the Collective Opinion, and has offered IAEA the opportunity to co-sponsor the

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document. We would suggest that IAEA consider the possibility of co-sponsoring the Collective Opinion, or adopting it when it is issued in late-1990.

If you have any further questions on this matter, please contact me or Julia Corrado, the Project Manager for international high-level waste activities, at 492-0434.

Sincerely,

/s/

Robert E. Browning, Director
Division of High-Level Waste Management
Office of Nuclear Material Safety and
Safeguards

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