



## Department of Energy

Washington, DC 20585

September 12, 1991

Mr. Robert Bernero  
Director  
Office of Nuclear Material Safety  
and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Bernero:

As discussed during the U.S. Nuclear Regulatory Commission/U.S. Department of Energy (NRC/DOE) interactions meeting of May 30, 1991, we welcome your staff's suggestion that we prepare an annotated outline of the license application for the repository. This is to explain how we plan to implement the use of an annotated outline.

First, a draft annotated outline will be developed through discussions with DOE personnel involved in the project and use of NRC published guidance, such as the draft Format and Content Regulatory Guide (FCRG), and industry experience. DOE personnel will use the annotated outline as a format to develop tables and text for a Safety Analysis Report (SAR) and a license application. This process pinpoints early in the license application development process what information may be needed, assuming the site is found to be suitable, to complete the SAR or license application and how the information will be obtained.

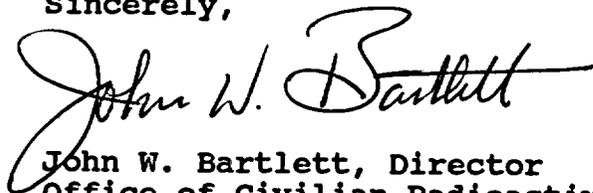
Then, the draft annotated outline will be revised and refined several times by DOE internally prior to the first submission to NRC for review. As a repository design progresses and is updated, we will update drafts of the annotated outline based on the new design information. These drafts will also incorporate guidance from the subsequent revisions of the FCRG, as well as responding to internal DOE and NRC comments. The development of the annotated outline will be an iterative process, with further reviews, revisions and refinements until the license application can be developed. Development of the license application will not begin until a site is found to be suitable.

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If you have any questions regarding this matter, please contact Dwight Shelor at 202-586-6046.

Sincerely,



John W. Bartlett, Director  
Office of Civilian Radioactive  
Waste Management

cc:

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