



Department of Energy

Washington, DC 20585

MAR 26 1992

Mr. 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
Washington, DC 20555

Dear Mr. Holonich:

The U.S. Nuclear Regulatory Commission's (NRC) On-Site Representative's (OR) in Las Vegas, Nevada, has asked the U.S. Department of Energy (DOE) to establish a protocol between the two agencies with respect to NRC's use of a video camera for recording various activities, features, or objects at the site during site characterization. This request originally arose a few months ago about obtaining a visual record of the walls of open trenches or soil pits. At a meeting on March 3, 1992, between the OR and Office of Geologic Disposal (OGD) staff, the request was reiterated and extended to include acquiring videotape of activities undertaken by drill crews implementing core handling procedures, or other videotape and audio records of people at work.

The original concept expressed by the OR, acquisition of geologic records of inanimate objects or geologic features, can be accommodated. DOE, however, regards videotaping of people performing various processes or activities to be beyond a reasonable request and an inappropriate manner for NRC to review site characterization activities. Also, indiscriminate videotaping could distract workers during the performance of processes or operations, causing a potential safety hazard.

The OR now has complete latitude to observe DOE operations in the field. The purpose of quality assurance audits and surveillances is to determine whether DOE has correctly performed work to procedures. Such discretion to videotape at will is regarded as beyond the scope of a Nuclear Waste Policy Act prelicensing activity. In addition, the NRC successfully regulates the activities of nuclear reactors without employing this manner of surveillance.

Standard industry experience will verify that utilities do not allow NRC to videotape construction activities while a utility is a potential license applicant, or operations once a license has been issued. Discretion beyond that provided to NRC by utilities in the private sector is not a precedent that should be established in the high-level waste program.

9203310047 920326
PDR WASTE
WM-11 PDR

102-8
WM-11
NH03

Some utilities have provided NRC film or videotape records of specific processes or operations upon request, and DOE is prepared to review requests of this type on a case-by-case basis. DOE can provide film or videotape of geologic features or inanimate objects upon request by the staff or through the vendor on the Nevada Test Site that routinely provides this service for DOE.

If you have any questions, please contact Priscilla Bunton at (202) 586-8365.



John P. Roberts
Acting Associate Director for
Systems and Compliance
Office of Civilian Radioactive
Waste Management

cc:

C. Gertz, YMPO
R. Loux, State of Nevada
K. Whipple, Lincoln County, NV
M. Baughman, Lincoln County, NV
J. Bingham, Clark County, NV
D. Bechtel, Clark County, NV
S. Bradhurst, Nye County, NV
B. Raper, Nye County, NV
P. Niedzielski-Eichner, Nye County, NV
R. Campbell, Inyo County, CA
R. Michener, Inyo County, CA
G. Derby, Lander County, NV
P. Goicoechea, Eureka, NV
C. Schank, Churchill County, NV
C. Jackson, Mineral County, NV
F. Sperry, White Pine County, NV
L. Vaughan, Esmeralda County, NV
K. Hooks, NRC