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FROM: Robert J. Wright, Senior Technical Advisor
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PDR
(Return to WM, 623-SS)

SUBJECT: SCHEDULE OF ACTIVITIES FOR REVIEW AND ANALYSIS OF
THE BWIP SITE CHARACTERIZATION REPORT

Background

The Site Characterization Report (SCR), being prepared by the Department of Energy (DOE) for the Basalt Waste Isolation Project (BWIP), is expected to be received by the NRC on November 15, 1982. We understand that it will be a document of about 1,800 pages.

Planning for NRC's review of the SCR and preparation of the Site Characterization Analysis (SCA) has been underway for some time. The purpose of this memorandum is to outline the proposed review activities; to identify the products therefrom; and to point out some constraints in the process.

Nature of the SCR

The SCR is a document that was conceived to fit the particular nature of the HLW repository licensing process. It is a unique, pre-licensing document, that, unlike documents in reactor licensing, is largely devoted to future site characterization plans. For this reason, NRC's response

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to the SCR is expected to differ from the customary actions of NRR in responding to documents prepared by license applicants. While provision is made for a public comment period, no public hearings are now planned during the SCR review. No findings will be made by NRC; rather, an opinion will be issued by the director of NMSS.

The limited scope of the NRC response to the SCR has been recognized by the NRC in setting an 8-month period for:

- (a) publication of a draft Site Characterization Analysis (DSCA), followed by
- (b) a 90-day (minimum) public comment period, followed by
- (c) publication of the SCA, with responses to public comments.

Meeting the 8-month time period means adoption of two approaches which differ from the customary procedures of reactor licensing. One - the SCA evaluation of issues at the site can not include a description of the staff's detailed analysis, examination of alternatives and defense of findings like that of the reactor licensing process. Rather, the SCA analysis of site issues will work directly toward a critique of the matters remaining to be resolved during site characterization (SC) and the plans therefor. This will be embraced, along with the director's opinion, in a document of about 40 pages, supplemented by previously prepared position papers, and other supporting documents, as appendices. A proposed outline of the SCA is attached. Two - only two months are allowed for the preparation of the SCA and the response to public comments. Depending on the volume of public comments, short cuts may be needed to avoid an extensive preparation period, as was required for the response to comments on Subpart E of 10 CFR 60. One approach is to streamline the length of each response. Another is to group similar comments and address the group with a single response. However, comments from states, indian tribal and local governments require individual responses, per 10 CFR 60.61(c). If the volume of public comments is very large, a response within 2 months may be impossible - regardless of streamlining.

Schedule of Activities

Attached is a proposed schedule of activities for NRC's review and analysis of the SCR. This schedule is predicated on two assumptions:

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- (1) The SCR will be received on November 15, 1982, as now planned by DOE.
- (2) The Site Characterization Analysis (SCA) will be published within 8 months after receipt of the SCR.

The proposed schedule has been prepared by myself after consultation with the topic review coordinators and the appropriate section leaders in WMHL and WMHT. It presents my best judgment on how to efficiently use the 8-month period, by identifying tasks to be done, their order, and the time for completion of each. Products of the review process are shown in the column on the right.

Clearly, the 8-month period is tight. Nevertheless, through prior preparation and close coordination within the review team, we believe that a high quality, sound, credible DSCA and SCA can be published within the prescribed time frame. The proposed schedule has been prepared to optimize efforts to this end.

Constraints in the review and analysis of the SCR

It is important to note that the proposed effort is constrained by the following:

- o Success depends upon the availability of NRC staff people commensurate with the schedule now in preparation by Paul Prestholt.
- o The SCA will be a document of about forty pages, single spaced. Supporting material, as appendices, will amplify the SCA. However, all appendix material must be in final draft form, approved by NMSS, before SCR receipt.
- o The schedule provides a total of three weeks for review, revision and final approval of the DSCA at branch, division, OELD and NMSS levels. Similarly, three weeks are provided for review, revision and final approval of the SCA. If more time is consumed in review/revision/final approval of either document, the 8-month goal can not be met.
- o Response to public comments will be limited to (a) specific, brief, representative, responses to states, indian tribal and

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local governments and (b) brief, representative responses to typical comments from other sources.

- o If the 90-day public comment period is extended, publication of the SCA will be delayed.
- o If responses are needed to comments offered after close of the 90-day period, these responses may not be completed until after publication of the SCA.
- o No documents other than those shown in the attachment will be prepared after SCR receipt, e.g., Commission papers, position papers, additional analyses, expanded response to public comments, and the like.

Conclusion

To ensure a successful SCR review and analysis and to meet the 8-month goal for completion, it is necessary for managements, through the NMSS director, to endorse the plans, the products to be developed and, especially, the constraints noted above.

"ORIGINAL SIGNED BY"

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Attachments:
As stated

"Pre-Decisional" JA, 8/19/82

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Outline of the Site Characterization Analysis

<u>Team Responsibility</u>		<u>No. of Pages</u>
P. M.	Analysis of Site Characterization Program Completeness Realism Appropriateness to resolve licensing issues	3
P. M.	Director's Opinion Issues not addressed Specific objections Specific recommendations	6
P. M.	1. Introduction Purpose of site characterization report Purpose of site characterization analysis Method of site characterization analysis Attention to prime issues Description of the BWIP Site Characterization Report	3
Institutional	2. Site Selection Process Basis for site selection State interaction Other sites in the same medium Other sites for which a site characterization report may be issued Comments on site selection process	4
Groundwater	3. Groundwater flow General statement of issues	6

		SCR treatment of prime issues Plans for resolution of prime issues during SC Analysis of SC plans	
Stability	4.	Geologic stability	4
		General statement of issues SCR treatment of prime issues Plans for resolution of prime issues during SC Analysis of SC plans	
Retardation	5.	Geochemical retardation	4
		General statement of issues SCR treatment of prime issues Plans for resolution of prime issues during SC Analysis of SC plans	
Design	6.	Design of facilities	6
		General statement of issues SCR treatment of prime issues Plans for resolution of prime issues during SC Analysis of SC plans	
Waste Package	7.	Waste package	4
		General statement of issues SCR treatment of prime issues Plans for resolution of prime issues during SC Analysis of SC plans	
P. M.	8.	Tabulation of issues from chapters 2, 3, 4, 5, 6 and other issues not discussed in the text.	2

Appendix

- A Background information - maps and sections of the BWIP
- B Table of contents of the BWIP SCR
- C. Identification of all issues and prime issues
- D Position papers completed before November 15
- etc do.

Outline - BWIP SCR Activities

<u>Week</u>	<u>Specific Activities</u>	<u>Continuing Activities</u>	<u>Products</u>
<u>Preparation for SCR Receipt</u>			
1982 9/5		TRG prepare site issue analyses, SCA appendices and graphics; PM prepares PSCA <hr/> PSCA reviewed by WHHT, WHHL, WM, NMSS	Notes from waste pkg./geochem. w.s. PSCA, draft site issue analyses Notes from per- formance workshop
9/12			
9/19			
9/26			
10/3	Facilities design workshop Geologic stability workshop		
10/10	(Provisional) Performance assessment workshop		
10/17			
10/24			
1/7			
<u>Preparation of DSCA</u>			
11/14	SCR arrives and is partitioned into review portions		
11/21	SCR portions are delivered to reviewers		
11/28	Reviewers analyze portions of SCR		
12/5	Reviewers prepare site issue analyses		
12/12	TRG receive site issue analyses from reviewers, prepare sections of SCA		

Abbreviations: DSCA - draft site characterization analysis,
 PM - project manager, PSCA - preparatory SCA, SCR - site
 characterization report, TRG - topic review groups

<u>Week</u>	<u>Specific Activities</u>	<u>Continuing Activities</u>	<u>Products</u>
12/19	TRG prepare sections of DSCA and compile site issue anal.		
12/26	PM compiles DSCA; TRG prepare site issue analyses		
1983 1/2	PM completes DSCA; TRG complete site issue analyses		
1/9	DSCA reviewed by TRG, WMHL and WMHT		
1/16	DSCA reviewed by WM, OELD		
1/23	DSCA reviewed by NMSS		
1/30	DSCA given final revision and approval		
2/6	DSCA is published, site issue analyses delivered to P.D.R.		DSCA, site issue analyses
<u>Public Comment Period</u>			
2/13		TRG finalize site issue analyses and SCA appendices and graphics TRG analyze public comments as received PM reworks DSCA	
2/20			
2/27			
3/6			
3/13			
3/20			
3/27			
4/3			
4/10			
4/17			
4/24			

<u>Week</u>	<u>Specific Activities</u>	<u>Continuing Activities</u>	<u>Products</u>
5/1 5/8	Continuation of public comment period	As above	SCA appendices and graphics

Preparation of SCA

5/15	TRG and PM analyze public comments		
5/22	TRG prepares sections of SCA		
5/29	PM compiles SCA, TRG prepare responses to public com.		
6/5	PM completes SCA, SCA discussed with DOE		
6/12	SCA and response to pub. com. reviewed by TRG, WMHL, WHHT		
6/19	SCA and response to pub. com. reviewed by WM, DELD		
6/26	SCA and response to pub. com. reviewed by NMSS		
7/3	SCA and response to pub. com. given final approval		
7/10	SCA published; response to public comments and site issue analyses delivered to P.D.R.		SCA, response to public comments, site issue analyses