

SEP 05 1991

RC/IAEA DOC REVISION

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MEMORANDUM FOR: Cynthia G. Jones, Acting Chief
Operations Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety and Safeguards

FROM: B. J. Youngblood, Director
Division of High-Level Waste Management
Office of Nuclear Material Safety and Safeguards

SUBJECT: REVIEW OF INTERNATIONAL ATOMIC ENERGY AGENCY (IAEA) DOCUMENT,
"SAFETY FUNDAMENTALS: THE SAFETY OF NUCLEAR INSTALLATIONS"

This is in response to your memorandum dated August 27, 1991 requesting review and comment on the subject document. Based on a conversation with the U.S. point of contact for this subject, Mr. James Heltemes, Jr., on September 3, 1991, it is unclear whether the current structure and scope of the document "Safety Fundamentals: The Safety of Nuclear Installations," is intended to include waste disposal. Often, the term waste storage is defined to include waste disposal. However, although the document does discuss waste storage, this seems to focus more on how to minimize the generation of waste. Therefore, it does not appear that the document addresses waste disposal.

Specifically, no mention of high-level waste disposal facilities is made in the Scope (para. 104, pg. 1) section when describing various types of nuclear installations affected by this document. In addition, no mention of natural barriers is made in the Design and Construction (para. 504, pg. 12) section of this document, or in the draft comments (ref. attachment, comment no. 7, pg. 2) to this document, when describing the multiple barrier approach systems to mitigate the consequences of design failure of a nuclear facility. The natural barrier is one of the barriers present in the multiple barriers for a waste disposal facility. Additionally, the section on Radioactive Waste Management and Decommissioning (pg. 16) does not address waste disposal, and is geared primarily towards nuclear reactors.

In summary, the Division of High-Level Waste Management recommends that the document state directly that it either includes or excludes waste disposal. If the choice is the former, then the subject document will need significant revisions by individuals knowledgeable on IAEA waste disposal concepts.

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B. J. Youngblood, Director
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