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NRC

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Utility Nuclear Waste Management Group

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cc: Steve Kale
enc. Steve Brocoun
Don Alexander
Carl Gertz
Dave Sufkan

MEMBERS

- Alabama Power Company
- Arizona Public Service Company
- Baltimore Gas & Electric Company
- Boston Edison Company
- Carolina Power & Light Company
- The Cleveland Electric Illuminating Company
- Commonwealth Edison Company
- Consolidated Edison Co. of New York, Inc.
- The Detroit Edison Company
- Duke Power Company
- Duquesne Light Company
- Florida Power Corporation
- Florida Power & Light Company
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- Gulf States Utilities Company
- Houston Lighting & Power Company
- Indiana & Michigan Electric Company
- Iowa Electric Light & Power Company
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- Mid-Atlantic South Services, Inc.
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- New York Power Authority
- Niagara Mohawk Power Corporation
- Northeast Utilities
- Northern States Power Company
- Omaha Public Power District
- Pacific Gas & Electric Company
- Pennsylvania Power & Light Company
- Philadelphia Electric Company
- Portland General Electric Company
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- Public Service Electric & Gas Company
- Rochester Gas & Electric Corporation
- Sacramento Municipal Utility District
- SNUPPS
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- Kansas Gas & Electric Company
- Kansas City Power & Light Company
- South Carolina Electric & Gas Company
- Southern California Edison Company
- Texas Utilities Company
- Toledo Edison Company
- Virginia Power
- Washington Public Power Supply System
- Wisconsin Electric Power Company
- Wisconsin Public Service Corporation
- Yankee Atomic Electric Company

cc: Ed Kay
w/o enc.

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8/17/88

August 12, 1988

Mr. Ralph Stein,
Acting Director for
System Integration and Regulations
Office of Civilian Radioactive
Waste Management
U.S. Department of Energy
Washington, D.C. 20545

Re: U.S. Department of Energy, Consultation
Draft Site Characterization Plan, Yucca
Mountain Site, DOE/RW-0160 (Jan. 1988)

Dear Mr. Stein:

The enclosed report provides the comments of the Edison Electric Institute (EEI) and Utility Nuclear Waste Management Group (UNWWMG) on the Department of Energy's Consultation Draft of the Site Characterization Plan (CDSCP) for the Yucca Mountain Site. EEI is the association of the nation's investor-owned electric utilities. UNWWMG is a group of 45 electric utilities providing active oversight of the implementation of federal statutes and regulations related to radioactive waste management. Together, EEI/UNWWMG represent the majority of the holders of contracts with DOE for disposal of spent nuclear fuel. To date, electric utilities (along with a few non-utility companies owning limited amounts of spent fuel) have paid over \$3.3 billion into the Nuclear Waste Fund. These funds are collected from the electricity consumer. It is extremely important that characterization of the Yucca Mountain site proceed in an efficient and cost effective manner.

EEI/UNWWMG are of the view that the CDSCP issued by DOE is thorough and fundamentally sound, and far more extensive than the general plan, descriptions and repository conceptual design information specified in Section 113(b) of the Nuclear Waste Policy Act, as amended. Accordingly, the CDSCP

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forms a sound basis upon which to proceed with the preparation of the statutory SCP and for performing the actual site characterization work itself.

The Nuclear Regulatory Commission's (NRC's) May 11, 1988 Final Point Papers on the CDSCP contain five "Objections." "Objections," contained in the Final Point Papers, identify "matters of such immediate seriousness to the site characterization program that NRC would recommend DOE not start work until they are satisfactorily resolved." EEI/UNWMO agree with the Objections noted in the NRC's Final Point Papers, and urge that DOE continue its efforts to resolve these matters on a priority basis.

In this connection, EEI/UNWMO have been concerned for some time over the lack of progress in developing Quality Assurance plans, and procedures for the DOE repository program. This same concern is the subject of Objection 5 in the Final Point Papers. We are very encouraged, however, by DOE's recent progress in this area. The appointment of a permanent Director to head the Office of Quality Assurance is an important step in establishing direction and long-term accountability in the QA program. In addition, aggressive pursuit of the plan and schedule for obtaining NRC acceptance of the DOE QA program, as presented at the July 7, 1988 DOE/NRC meeting on QA open items, should assure the establishment of a QA plan sufficient to support new site characterization work on a timely basis. DOE's approach to addressing the NRC's concerns with respect to QA as expressed in Objection 5, should be a model for resolving the issues raised in other Objections.

EEI/UNWMO agree with DOE and NRC that there is no basis to believe, at this time, that the Yucca Mountain site would be found unsuitable for a repository. However, at this juncture in the development of the high-level radioactive waste disposal system, all parties would agree that there is a possibility-- however remote -- that the Yucca Mountain site may be found unsuitable. From the standpoint of program efficiency and cost effectiveness, it is extremely important to know if such a determination would likely be made. Therefore, we strongly urge DOE to develop a methodology for an ongoing evaluation of the suitability issue separate from the site characterization program. This would go a long way to assure those paying for the program that site characterization activities at Yucca Mountain are being carried out in a cost effective manner by limiting the possibility for costly work at depth to proceed when it would no longer be effective.

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Additional, specific comments are offered in the Enclosure. All are intended to be constructive, and each contains a recommendation or suggestion directed at indicating how the particular comment might be addressed.

EI/UNWVG appreciate the opportunity to review the CDSCP and hope our comments are helpful. Please let us know if you have any questions or if we may otherwise be of assistance as the Department proceeds with preparation of the statutory SCP and site characterization activities.

Sincerely,


S.P. Kraft
Director

NSM/mlf
Enclosure

cc: Mr. Robert Browning, NRC