Mr. Ralph Stein, Acting Associate Director Office of Systems Integration and Regulation Office of Civilian Radioactive Waste Management U.S. Department of Energy RW-24 Washington, D.C. 20585

Dear Mr. Stein:

We appreciated receiving your April 11, 1988, letter to R. Browning which transmitted for our information the document titled "Guidance for Completion of the Yucca Mountain SCP." This document describes DOE's organization, schedule, and six tasks for completing the statutory Site Characterization Plan (SCP) for the Yucca Mountain Site in late 1988. We have read this document, and I would like to bring to your attention the following two observations.

First, as described in the guidance document, an issue-closure methodology will be developed under Task 1 and presented in the SCP. If not already included, this methodology should recognize the need for consultations with the NRC to allow for consideration of NRC concerns in determining when sufficient testing has been completed. In addition, the methodology should specifically include how DOE will consider any NRC open items related to an issue.

Second, network schedules will be developed under Task 4 and included in the SCP. The description of the task in the guidance document in the first paragraph on page 3 and the first full paragraph on page 4 mention sequencing activities and appear to emphasize consideration of funding in developing schedules. I would like to remind you that our review of the SCP will check that the sequences and schedules of activities take into consideration possible interferences among tests as well as between tests and exploratory shaft construction activities.

We are providing these observations for your consideration in preparing the SCP; therefore, no specific response is required. If you have any questions or comments on our observations, please call John Linehan (492-0411) or me (492-3387).

Sincerely,

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B.J. Youngblood, Chief Operations Branch Division of High-Level Waste Management, NMSS

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