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MEMORANDUM FOR: B. J. Youngblood, Director
Division of High-Level Waste Management, NMSS

FROM: Margaret Federline, Chief
Hydrology and Systems Performance Branch
Division of High-Level Waste Management, NMSS

SUBJECT: REVIEW OF THE DIVISION OF HIGH-LEVEL WASTE MANAGEMENT MANUAL

At your request we have completed a review of the Draft Division of High-Level Waste (HLW) Manual. The following comments resulted from the review.

Chapter 0220 General Operating Procedure No. 4.1 should more clearly define the terms "analytical techniques" and "process-like activities," and should give examples.

General Operating Procedure No. 7.1 authorizes the secretary to the Director, HLWM to assign work to members of the division by preparing and assigning tickets. This procedure does not capture the actual practice which is for managers and supervisors to decide on work assignments which are then implemented through the ticketing process. The secretary's responsibility is limited to recording those assignments by issuing tickets.

In general, guidance for the interaction with the Center for Nuclear Waste Research and Analysis (CNWRA) may be better facilitated in a separate guidance document. Revisions to the CNWRA contract are not uncommon; therefore, the guidance for the CNWRA contract should be maintained separately to avoid the publication of a new version of the HLW manual for every change in the CNWRA contract or guidance related to its implementation.

In addition, the manual should not contain information which is contained in other published guidance documents given to the staff. This information should be incorporated by reference.

We also suggest that review plan guidance be maintained in a separate document and incorporated by reference. The Manual only provides guidance for the review of DOE Study Plans. Since the staff is required to review other DOE documents in addition to Study Plans, (e.g., Sandia's Total System Performance Assessment, DOE Progress Reports), additional specific or generic review plan guidance will be appropriate. If such guidance is incorporated in the Manual, additional revisions will be required.

The manual was also compared to the existing Waste Management (WM) Policy Memorandum in order to determine if there are any discrepancies between the

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current policies and the Draft Manual. Although the Draft Manual contained most of the policy memoranda there were many omissions.

Enclosure 1 contains a list of the Current WM Policy Memorandum which may be appropriate for inclusion in the Draft HLW manual. A few of the policies contained in the policy memoranda were originally established for use in the Division of Waste Management (DWM) and may no longer be applicable to the Division of High Level Waste Management (HLWM). Enclosure 2 lists the policies that are acceptable omissions from the Draft HLW Manual, because they are no longer applicable to HLWM.

We recommend that the policies identified in Enclosure 1 and 2 be reviewed in revision of the draft HLWM Manual to ensure that policies are up-to-date and that all appropriate policies are included. Questions regarding this review should be directed to Heather Astwood on 504-3466.

/s/ MVF

Margaret Federline, Chief
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Enclosures: As Stated

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Enclosure 1 - Omissions of Waste Management Policy Memoranda from the DHLWM Manual that may be inappropriate.

- **WM #6 Federal Register (FR) Notice of Receipt of License Applications**
- **WM #9 Advanced Preparation for Meetings and Trips**
- **WM #13 Technical Work in Waste Management**
- **WM #16 DWM Participation in Preparation of Environmental Impact Statements**
- **WM #18D Correspondence Between Division of Contracts and Waste Management Project Managers**
- **WM #18F Assurance of Absence of Duplication Between NRC and DOE**
- **WM #20 Suspense Copies**
- **WM #23 Procedures for Notification of Regional Headquarters**
- **WM #31 Interim Work Flow Policy**
- **WM #32 Development of Work Plans for Planning and Tracking WM Projects**
- **WM #37 Ensuring Fair Selection for GG-13 and Above Positions**
- **WM #38 Record of WM Briefings and Speeches**
- **WM #41 Standard Training for New Employees**

Enclosure 2 - Omissions of Waste Management Policy Memoranda from the DHLWM Manual that appear to be appropriate

- **WM #2 Information and Training Meetings**

This memorandum developed information and training sessions to be held every other Wednesday in DWM. However this memorandum was signed in April of 1979 and the procedure is no longer followed.

- **WM #8 New Information to Licensing Boards**

These were temporary procedures to follow while the SECY paper describing the procedure was being revised. This procedure probably does not apply currently.

- **WM #12 Interface and Division of Responsibility Between the Office of NMSS and I&E**

Since the office of I&E no longer exists, this direction should be reviewed to see if appropriate functions are covered in office procedures. Also, the HLW manual should not repeat information found in other documents.

- **WM #15 Deletion of 10 CFR 20.304**

This procedure explained the result of omitting 20.304 and how to respond to requests for a 20.304 burial. This is more applicable to Low-Level Waste Management.

- **WM #21 Procedure Governing Retiring of DWM Licenses**

This policy describes the procedure to follow when retiring a source, byproduct or a special nuclear materials license. This procedure was developed for DWM and is now more applicable in the Division of Low-Level Waste.

- **WM #28 Printer Procedures for the IBM 5520**

The 5520 system is no longer in use in the agency.