

APR 27 1992

Mr. John P. Roberts, Acting Director
for Systems and Compliance
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Roberts:

SUBJECT: PHASE I REVIEW OF U.S. DEPARTMENT OF ENERGY (DOE) STUDY PLAN,
PALEOCLIMATE STUDY: LAKE, PLAYA, AND MARSH DEPOSITS

On December 6, 1991, DOE transmitted the study plan, "Paleoclimate Study: Lake, Playa, and Marsh Deposits" (Study Plan 8.3.1.5.1.2), to the U.S. Nuclear Regulatory Commission for review and comment. NRC has completed its Phase I Review of this document using the Review Plan for NRC Staff Review of DOE Study Plans, Revision 1 (December 6, 1990).

The material submitted in the study plan was considered to be consistent, to the extent possible at this time, with the NRC-DOE agreement on content of study plans made at the May 7-8, 1986, meeting on Level of Detail for Site Characterization Plans and Study Plans. The NRC staff recognizes that some of the information required in the agreement, especially many of the technical procedures for field and laboratory tests, cannot be provided until the prototype testing described in the study plan is completed. The staff did not consider that the absence of such information compromised its ability to conduct its Phase I Review of the material provided. However, the NRC staff requests that the procedures, methods, and other relevant details be provided to NRC for its review as soon as that information is available.

A major purpose of the Phase I Review is to identify concerns with studies, tests, or analyses that, if started, could cause significant and irreparable adverse effects on the site, the site characterization program, or the eventual usability of the data for licensing. Such concerns would constitute objections, as that term has been used in earlier NRC staff reviews of DOE's documents related to site characterization (Consultation Draft Site Characterization Plan and the Site Characterization Plan for the Yucca Mountain Site.) It does not appear that the conduct of the activities described in this study plan will have adverse impacts on repository performance and the Phase I Review of this study plan identified no objections with any of the activities proposed.

After completion of the Phase I Review, selected study plans are to receive a second level of review, called a Detailed Technical Review, based on the relationship of a given study plan to key site-specific issues or NRC open items, or its reliance on unique, state-of-the-art test or analysis methods. Based on these criteria, we have decided not to proceed with a Detailed Technical Review of this study plan at this time, but, due to the importance of data to be collected under this study, a detailed technical review may be performed after all of the test procedures related to the study have been developed.

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If you have any questions concerning this letter, please contact Charlotte Abrams, of my staff, at (301)504-3403/FTS 964-3403.

Sincerely,

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Joseph J. Holonich, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

cc: C. Gertz, DOE/NVDM
R. Loux, State of Nevada
S. Bradhurst, Nye County, NV
P. Niedzielski-Eichner, Nye County, NV
C. Thistlethwaite, Inyo County, CA
M. Baughman, Lincoln County, NV
D. Bechtel, Clark County, NV
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