

JAN 14 1993

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MEMORANDUM FOR: Charlotte Abrams, Senior Project Manager  
Repository Licensing and Quality Assurance  
Project Directorate, DLHWM

THRU: Margaret Federline, Chief  
Hydrology and Systems Performance Branch, DHLWM

FROM: Dan Fehringer, Acting Section Leader  
Repository Performance Assessment Section  
Hydrology and Systems Performance Branch, DHLWM

SUBJECT: DOE RESPONSES TO SCA COMMENTS 100, 104, 106, 108, 110,  
112 AND 113

The Systems Performance Section has reviewed DOE's responses to the subject Site Characterization Analysis comments, as transmitted to J. Holonich by J. Roberts on August 31, 1992. In general, we find DOE's responses to be satisfactory. For a couple of DOE's responses, we continue to have minor questions or concerns. However, since we expect that these can readily be resolved during future technical exchanges or other interactions with DOE, and since they are technically detailed, we agree that all comments should be closed.

At least one of DOE's responses (comment 108) anticipates future information exchanges between DOE and NRC as DOE's program progresses. Any correspondence documenting closure of these comments should reserve the right to reopen these comments if the expected information exchanges fail to materialize.

DOE's response to comment 104 indicates that the form of the waste (glass, spent fuel or other) is better treated as an initial condition of the system rather than as part of a scenario analysis. We agree, and concur in closing the comment. We should note, however, that closure of the comment is not an endorsement of glass as the preferred waste form for reprocessing wastes.

DOE's response to comment 110 suggests that NRC has adopted certain positions regarding treatment of potential human intrusion when evaluating repository safety. I do not think DOE's statements accurately characterize the Commission's positions, and any correspondence documenting closure of these comments should note our disagreement with DOE's characterization of the Commission's views.

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Dan Fehringer, Acting Section Leader  
Repository Performance Assessment Section  
Hydrology and Systems Performance Branch, DHLWM

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DOE's response to comment 110 suggests that NRC has adopted certain positions regarding treatment of potential human intrusion when evaluating repository safety. I do not think DOE's statements accurately characterize the Commission's positions (or lack thereof), and any correspondence documenting closure of these comments should note our disagreement with DOE's characterization of the Commission's views.

Dan Fehringer, Acting Section Leader  
 Repository Performance Assessment Section  
 Hydrology and Systems Performance Branch, DHLWM

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