

MAY 18 1988

MEMORANDUM FOR: John Linehan, Section Leader
Projects Section
Operations Branch, DHLWM

FROM: Joseph J. Holonich, Sr. Project Manager
Projects Section
Operations Branch, DHLWM

SUBJECT: TRIP REPORT ON MAY 4, 1988 TECHNICAL PROJECT
OFFICERS MEETING

On May 4, 1988, I attended the monthly Waste Management Project Office (WMPO) Technical Project Officers (TPO) meeting. The meeting began with Mr. Carl Gertz, the WMPO Project Manager providing an update on recent and future public interactions. The two major upcoming activities are the appearance of WMPO representatives before the Nevada State Legislative Committee on High-Level Waste the week of May 9, 1988 and a potential sub-committee hearing of the U. S. Senate Environment and Publicworks Committee on June 1, 1988.

Another point of interest discussed by Mr. Gertz was a decision by the Secretary of Energy to identify Clark County, Nevada as an affected unit of local government. The requirement to have the Department of Energy (DOE) interact with local governments is contained in the 1987 amendment to the Nuclear Waste Policy Act. By being considered an affected area of local government, Clark County is eligible to request grant money from DOE. Clark County was granted this status because of its proximity to Nye County. There is a total of seven contiguous counties, including Clark County, to Nye County. In its application to be considered an affected local unit of government, Clark County reaffirmed its objection to the repository but further stated that since Yucca Mountain is presently the selected site, Clark County wanted to be considered an affected unit. None of the remaining counties have applied for the status.

With respect to the State of Nevada university system, Mr. Gertz stated that WMPO is continuing its involvement with the state system. The majority of the WMPO effort would be with the University of Nevada (UN) at Las Vegas with UN at Reno and the Desert Research Institute receiving a smaller amount of the WMPO involvement.

Also discussed was the recent lawsuit filed by the State against the Bureau of Land Management (BLM). Basically, the State is contesting that the right of way granted by BLM was not the correct means of providing the land to DOE. Rather, the State believes that BLM should have used the withdrawal process, which requires Congressional and state legislature approval, to provide the land. The Nevada suit centers on the question of state's rights as covered by the 10th Amendment in the Constitution. To date, no restraining order has been issued; therefore, DOE still has access to the land.

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One of the final points raised by Mr. Gertz included a discussion on the fact that Congress has limited future funds and, therefore, it was still a challenge to fit the program into the available funds. In addition, he mentioned that a name change from WMPO to the Yucca Mountain Project was being considered. Finally, he discussed a proposed reorganization of WMPO. The reorganization would not be significant and would create four divisions with branches within the divisions. The present organization has all branches reporting to the Project Manager. The proposed reorganization must still be approved by DOE Headquarters.

Following the WMPO items of interest the discussion turned to the need for qualified quality assurance (QA) plans before site characterization activities could begin. DOE has formed a working group that has developed a strategy on what is involved in order to obtain qualification. It is the opinion of DOE that work can start once DOE has completed its own qualification of the necessary QA plans as well as implementation. Finally, Mr. Gertz reported that DOE was scheduling a meeting with Jerry Szymanski and the DOE reviewers to go over the reviewers comments on the Szymanski report.

Next, the TPOs present reported their items of interest. The major items discussed are given below.

First, Lawrence Livermore Laboratory (LLL) reported that it will have a response to WMPO in about a week on the numerical definition of a substantially complete containment. In addition, LLL is preparing a performance allocation on the waste package that deals with anticipated and unanticipated events.

Holmes and Narver noted that the CLIMAX project was back in operation and that its response to the recent WMPO QA audit was complete.

Fenix and Scission (F&S) reported that its response to the WMPO QA audit of F&S had been submitted to WMPO.

The U. S. Geological Survey (USGS) stated that it understood that there was considerable discussion held on the merit of the significant deficiency reports issued as a result of the WMPO QA audit held the week of April 25, 1988. In addition, the USGS was concerned about the audit process. It raised this as a point of interest and it was decided to discuss it further at the executive session of the meeting. With respect to the Szymanski report, the USGS was organizing a team to work in May on the review. Finally, the USGS reported that the wet/dry drilling prototype had been accepted as a test case.

Several of the DOE TPOs gave reports on upcoming DOE and DOE/WMPO meetings. The upcoming meetings discussed were a May 5 and 6, 1988 meeting to scope the issue resolution approach for the final site characterization plan (SCP). The meeting would also address DOE/NRC interactions and how to develop building blocks for the safety analysis report. A second meeting was a May 10, 1988 meeting with Steve Kale, Ralph Stein, et.al., to discuss SCP completion. The goal is to determine if phase one of the SCP process is complete and if phase two is going in a meaningful way.

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Los Alamos National Laboratory (LANL) reported that its QA program plan (QAPP) had been approved by LANL and included suggestions raised by the NRC staff during its audit. As a result of the QAPP, LANL is requiring three mandatory training sessions in QA. The last point raised by LANL was the fact that a draft of the exploratory shaft facility (ESF) test management plan had been completed and was in for review.

The Sandia National Laboratory (SNL) stated that its report on the ESF seismic design basis analysis was final and being circulated to the TPOs. In addition, the SNL paper on the approach for validation of the design was complete but in draft form. With respect to the State of Nevada, SNL was working with DOE Headquarters and WMPO on an approach to evaluate the effect of state characterization activities on site performance.

Finally, the TPO from REECO gave a short report in which he informed the meeting that REECO was giving support to the State in water sampling collection and rock sampling. He also reported that for the sample storage in area 25 of the test site the weapons related cores had been removed and that storage racks have been installed.

Science Applications International Corporation raised a concern about the fact that the amount of unplanned work was increasing and that WMPO and the TPOs needed to meet and develop some type of planning strategy so that future workloads would be anticipated. It was decided that this issue would be discussed in the executive session.

Once the TPO information items were complete, three presentations were made. The first, by Mr. Max Blanchard of DOE, covered the status of the SCP and study plans. The second was made by the TPO from SNL and dealt with a proposed outline for developing action plans for SCP study plans. Following this presentation, the TPOs decided to use Section 8.3.1.2.2.3, "Characterization of Perlocation in the Unsaturated Zone-Surface-Based Study" of the SCP as a test case for the proposed process. Finally, the meeting ended with a presentation by myself on the NRC regulatory role. Copies of the slides from the presentations are contained in Enclosures 1, 2, and 3 respectively.

On May 5, 1988, I meet with Carl Gertz, Ralph Stein, and Pierre Saget of DOE as well as the QA managers from the various contractors associated with the project. The purpose of this meeting was to convey the staff concerns on the USGS audit conducted by DOE/WMPO the week of April 25, 1988. Enclosure 4 contains a listing of the staff concerns. The meeting lasted about an hour and appeared to be of some use to all participants. It should be noted that, at present, the concerns given in Enclosure 4 are preliminary. The final concerns will be documented in the staff summary report on the audit.

Mr. Paul Prestholt, the NRC on-site representative, attended both the TPO meeting and the May 5, 1988 meeting with me.

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Joseph J. Holmich, Sr. Project Manager
Projects Section
Operations Branch

Enclosures: As stated

DISTRIBUTION/CONCURRENCE: SEE NEXT PAGE

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ENCLOSURE 1

Presentation on SCP and Study Plan Status

MAY 4, 1988
PM/TPO MEETING

- **OVERVIEW OF NRC ALTERNATE CONCEPTUAL MODELS WORKSHOP**
- **STATUS OF SCP COMPLETION ACTIVITIES**
- **STATUS OF STUDY PLAN PREPARATION & REVIEW**

5-4-88
PM/TPO Meeting
page 1

STATUS OF SCP COMPLETION ACTIVITIES

OVERALL OBJECTIVES OF SCP COMPLETION ACTIVITIES

- ESTABLISH REALISTIC SCOPE, SCHEDULES, AND COSTS FOR SCP/CD ACTIVITIES
- INCORPORATE TEXT REVISIONS AS APPROPRIATE IN RESPONSE TO COMMENTS FROM THE NRC, USGS, STATE AND OTHERS INCLUDING THOSE RELATED TO THE ALTERNATE CONCEPTUAL MODELS WORKSHOP
- PREPARE STATUTORY SCP FOR PUBLIC RELEASE IN LATE DECEMBER, 1988

STATUS OF SCP COMPLETION ACTIVITIES (CONTINUED)

WORKING GROUP STATUS & OBJECTIVES

- PHASE I QUESTIONNAIRES FOR ASSESSMENT OF THE "IMPORTANCE" OF EACH SITE, PERFORMANCE, AND DESIGN ACTIVITY WERE COMPLETED.

- PHASE II ACTIVITY-LEVEL LOGIC DIAGRAMS HAVE BEEN PREPARED FOR ALL SITE PROGRAMS BY WORKING GROUPS 1-4, AND ARE UNDER PREPARATION BY WORKING GROUPS 5&6 FOR PERFORMANCE AND DESIGN ACTIVITIES INCLUDED IN THE SCP.

- PHASE II OBJECTIVES INCLUDE:
 - ESTABLISH REALISTIC DURATIONS FOR ALL SCP ACTIVITIES

 - USE REALISTIC ACTIVITY DURATIONS TO DEVELOP REALISTIC SITE CHARACTERIZATION SCHEDULE

 - VERIFY IMPORTANT LINKAGES AMONG SITE PROGRAMS AND FROM SITE PROGRAMS TO PERFORMANCE & DESIGN ISSUES

 - ESTABLISH REALISTIC COST ESTIMATES FOR SCP ACTIVITIES

STATUS OF SCP COMPLETION ACTIVITIES (CONTINUED)

INTEGRATION GROUP STATUS & OBJECTIVES

- THE INTEGRATION GROUP HAS PREPARED IMPORTANCE SUMMARIES (ROLL-UPS) FOR ALL SITE ACTIVITIES; ROLL-UPS FOR PERFORMANCE & DESIGN ACTIVITIES ARE UNDER PREPARATION
- A JOINT IG/PROGRAM REVIEW GROUP (PRG) MEETING WAS HELD ON APRIL 28, 1988, TO REVIEW THE STATUS OF SCP COMPLETION ACTIVITIES
- THE IG IS PREPARING GUIDANCE TO WORKING GROUPS TO BE FOLLOWED DURING PHASE II TO DEVELOP REALISTIC COST ESTIMATES FOR THE SCP/CD ACTIVITIES
- THE IG IS DEVELOPING A PLAN (INCLUDING SCOPE AND SCHEDULES) FOR REVISING THE SCP/CD IN RESPONSE TO COMMENTS FROM THE NRC IN THEIR POINT PAPERS AND AT THE ALTERNATE CONCEPTUAL MODELS WORKSHOP, AND IN RESPONSE TO COMMENTS RECEIVED FROM THE USGS
- A NEW WORKING GROUP (#7) WAS FORMED TO ADDRESS:
 1. 8.4 REVISIONS -- IMPACTS OF PENETRATION OF ROCK UNITS BELOW THE REPOSITORY HORIZON
 2. REVISIONS TO SCENARIOS CONSIDERED IN THE TOTAL SYSTEM ISSUE AND TO CALCULATION OF THE CCDF
 3. INTEGRATION AND EXPANSION OF DISCUSSIONS IN THE SCP ABOUT VALIDATION OF MODELS
 4. EXPANSION OF DISCUSSIONS ABOUT THE ISSUE CLOSURE PROCESS

STATUS OF SCP COMPLETION ACTIVITIES (CONTINUED)

PROGRAM REVIEW GROUP (PRG) STATUS AND OBJECTIVES

- FIRST OFFICIAL MEETING WAS HELD IN LAS VEGAS, NV ON APRIL 28, 1988
 - THE PRG GAVE THE IG AN ACTION ITEM TO REEXAMINE THE NEED FOR COMPREHENSIVE GEOLOGIC MAPPING IN ES-2
 - THE PRG ALSO RECOMMENDED THAT THE DOE SHOULD NOT PLAN TO PENETRATE ROCK UNITS BELOW THE REPOSITORY UNTIL COMPLETION OF A THOROUGH ANALYSIS OF THE IMPACTS
- ANALYSIS OF NRC POINT PAPERS BY WESTON IS DUE TO THE PRG ON MAY 4, 1988. PRG WILL REVIEW AND APPROVE RECOMMENDATIONS FOR COMMENT DISPOSITION & PROVIDE GUIDANCE TO INTEGRATION AND WORKING GROUPS
- ANALYSIS OF USGS COMMENTS BY WESTON IS DUE TO THE PRG ON MAY 18, 1988. PRG WILL REVIEW AND APPROVE RECOMMENDATIONS FOR COMMENT DISPOSITION & PROVIDE GUIDANCE TO INTEGRATION AND WORKING GROUPS
- ANALYSIS OF TRANSCRIPT FROM NRC ALTERNATE CONCEPTUAL MODELS BY WESTON IS DUE TO THE PRG ON MAY 30, 1988. PRG WILL REVIEW AND APPROVE THE RECOMMENDATIONS FOR COMMENT DISPOSITION & PROVIDE GUIDANCE TO THE INTEGRATION AND WORKING GROUPS

NRC WORKSHOP ON ALTERNATE CONCEPTUAL MODELS: OVERVIEW

- THE COMPLETE TRANSCRIPT OF THE WORKSHOP IS EXPECTED TO BE AVAILABLE THE SECOND WEEK OF MAY (TRANSCRIPT FOR DAY 1 ARRIVED 5/2/88)
- PLANS FOR SCOPING CHANGES TO THE SCP

--WESTON TECHNICAL STAFF WILL ANALYZE THE TRANSCRIPT AND MAKE GENERAL RECOMMENDATIONS ABOUT REQUIRED CHANGES TO THE PRG BY MAY 30, 1988

--THE PRG WILL THEN DIRECT THE IG AND WGS TO BEGIN THE COMMENT RESPONSE PROCESS

--THE IG IS CURRENTLY ANALYZING THE APPROACH TO BE TAKEN FOR INCORPORATING TABLES INTO SITE PROGRAM SECTIONS WHICH INCLUDE THE FOLLOWING ENTRIES:

CURRENT REPRESENTATION OF MODEL	UNCERTAINTY IN CURRENT UNDERSTANDING	ALTERNATIVE HYPOTHESES	PLANNED TESTING TO REDUCE UNCERTAINTY & TEST HYPOTHESES
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--ADDITIONAL TEXT CHANGES MAY BE NECESSARY TO BETTER INTEGRATE THE PERFORMANCE AND DESIGN REQUIREMENTS TO THE SITE ACTIVITIES PROVIDING THE DATA

STATUS OF STUDY PLANS

STUDIES THAT HAVE BEEN REVIEWED AT DOE/HQ

<u>Study plan #</u>	<u>Title</u>	<u>Current status</u>
8.3.1.15.1.5** (USGS)	Excavation Investigations	3rd draft to HQ for final approval on 3/20/88
8.3.1.2.2.2** (LANL)	CI-36 Tracer Tests	3rd draft to HQ for final approval on 4/11/88
8.3.1.4.2.2** (USGS)	Structural Features	2nd draft to HQ for final approval on 4/11/88
8.3.1.2.2.4** (USGS)	ESF Percolation Studies	2nd draft to WMPD on 4/20/88 and to HQ for approval on 5/?/88
8.3.1.15.2.1 (USGS)	Ambient Stress	2nd draft to HQ for final approval on 4/8/88

STUDY PLAN STATUS (CONTINUED)

STUDIES THAT HAVE NOT YET BEEN REVIEWED AT HQ

<u>Study plan #</u>	<u>Title</u>	<u>Current status</u>
8.3.1.5.2.1** (USGS)	Quaternary Regional Hydrology (includes calcite- silica activities)	1st draft to HQ for review on 3/31/88 Revised 1st draft to HQ on 5/?/88
8.3.1.3.2.1** (LANL)	Mineralogy and Petrology of Transport Pathways	1st draft to HQ for review on 5/2/88
8.3.1.3.2.2** (LANL)	Alteration History	1st draft in WMPD review; planned submittal to HQ on 6/1/88
8.3.4.2.4.1 (LLNL)	Waste Package Environment	1st draft to HQ for review 5/?/88
8.3.1.2.3.1** (LANL)	C-Wells Tracer Tests	1st draft to HQ for review on 4/11/88
8.3.1.15.1.1 (SNL)	Lab Thermal Properties	1st draft to HQ for review on 4/11/88
8.3.1.15.1.3** (SNL)	Lab Mechanical Properties	1st draft to HQ for review on 3/31/88

**Studies on the "high-priority" list sent to NRC--see next page

PRELIMINARY LIST OF "PRIORITY" STUDY PLANS TO BE SENT TO THE NRC

Study #	Study plan title	Estimated date to the NRC
1. 8.3.1.2.1.3	CHARACTERIZATION OF THE GROUND-WATER FLOW	4/89
2. 8.3.1.2.2.1	CHARACTERIZATION OF UNSATURATED ZONE INFILTRATION	1/89
3. 8.3.1.2.2.2	WATER MOVEMENT TRACER TESTS USING CHLORIDE AND CHLORINE-36 MEASUREMENTS OF INFILTRATION AT YUCCA MOUNTAIN	5/88
4. 8.3.1.2.2.3	CHARACTERIZATION OF PERCOLATION IN THE UNSATURATED ZONE - SURFACE-BASED STUDY	11/88
5. 8.3.1.2.2.4	CHARACTERIZATION OF YUCCA MOUNTAIN PERCOLATION IN THE UNSATURATED ZONE - EXPLORATORY SHAFT FACILITY INVESTIGATIONS	6/88
6. 8.3.1.2.2.8	HYDROCHEMICAL CHARACTERIZATION OF THE UNSATURATED ZONE	4/89
7. 8.3.1.2.3.1	CHARACTERIZATION OF THE SITE SATURATED ZONE GROUND-WATER FLOW SYSTEM (TWO PARTS)	9/88 4/89
8. 8.3.1.3.2.1	MINERALOGY, PETROLOGY, AND CHEMISTRY ALONG TRANSPORT PATHWAYS	10/88
9. 8.3.1.3.2.2	HISTORY OF MINERALOGIC AND GEOCHEMICAL ALTERATION OF YUCCA MOUNTAIN	1/89

PRIORITY STUDY PLAN LIST - CONTINUED

10. 8.3.1.3.4.1	BATCH SORPTION STUDIES	11/88
11. 8.3.1.4.2.2	CHARACTERIZATION OF STRUCTURAL FEATURES WITHIN THE SITE AREA	10/88
12. 8.3.1.5.2.1	CHARACTERIZATION OF THE QUATERNARY REGIONAL HYDROLOGY	11/88
13. 8.3.1.15.1.3	LABORATORY DETERMINATION OF THE MECHANICAL PROPERTIES OF INTACT ROCK	10/88
14. 8.3.1.15.1.5	EXCAVATION INVESTIGATIONS	3/88
15. 8.3.1.17.4.1	HISTORICAL AND CURRENT SEISMICITY	4/89
16. 8.3.1.17.4.2.	LOCATION AND REGENCY OF FAULTING POTENTIAL NEAR PROSPECTIVE SURFACE FACILITIES	2/89
17. 8.3.1.17.4.6	QUATERNARY FAULTING WITHIN THE SITE AREA	4/89

REPORTS FOR DEMONSTRATION OF REGULATORY COMPLIANCE

STUDY REPORTS (SRs)

Study Reports will include compilations of raw and interpreted data, and data/information integration and synthesis reports. These reports will be prepared by participant Principal Investigators (PIs) within the NNWSI Project to fulfill technical milestones as detailed in SCP Chapter 8.3. The information and conclusions of these reports will provide the technical basis for the documentation of regulatory compliance and reference technical information needed by other portions of the technical program.

Position Papers (PPs)

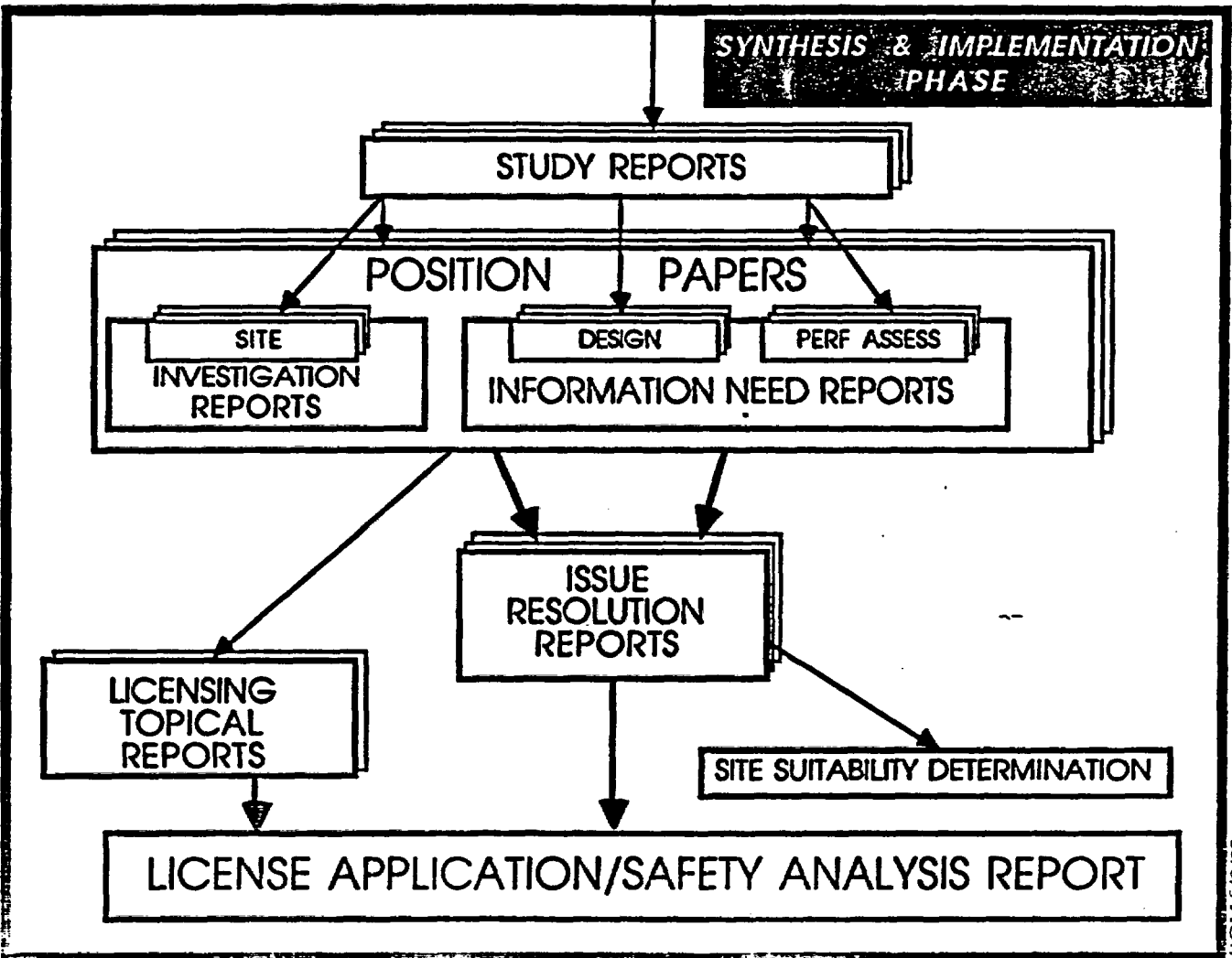
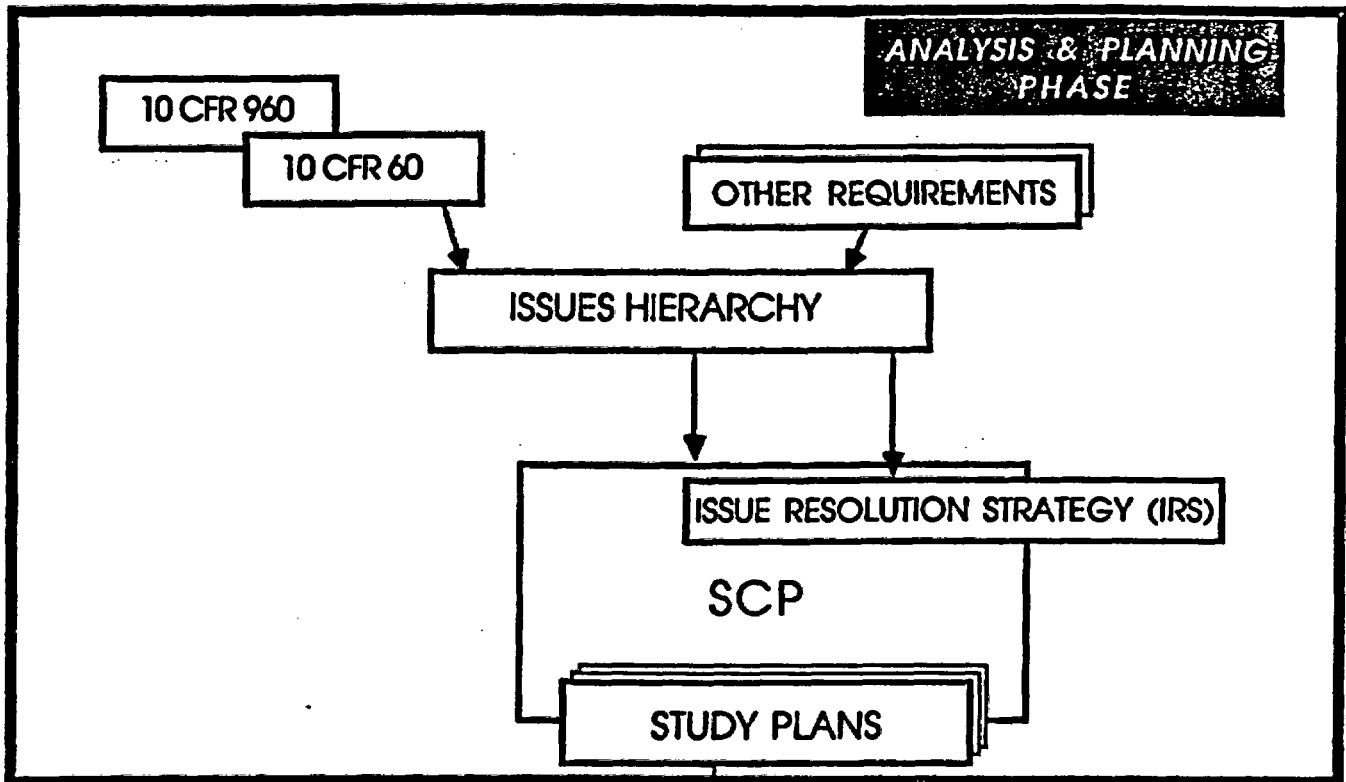
Position Papers will include Site Investigation Reports, and Design and Performance Assessment Information Need Reports, and constitute the initial level of regulatory compliance documentation. These are envisioned as brief reports that address a relatively narrow scope of regulatory requirements and provide the basis for regulatory interaction with the NRC and other outside organizations (State of Nevada, etc.). PPs will be written by the regulatory organizations within the Project aided by technical support from participant PIs. Position Papers will provide information needed to produce all higher level regulatory compliance documentation, and positions established for PP topics will be used in support of other parts of the technical program.

ISSUE RESOLUTION REPORTS (IRRs)

Issue Resolution Reports will be used to demonstrate resolution of the issues of the OGR Issues Hierarchy, as outlined by the milestones of Chapter 8.5 of the SCP. These reports will be prepared by the DOE/HQ regulatory organization, assisted by the NNWSI Project, with technical support from participant PIs, as needed, and will be largely based on the input from component PP topics. As currently envisioned, IRRs dealing with 10 CFR 60 issues will provide modular sections for inclusion in the Safety Analysis Report (SAR), and for 10 CFR 960 issues, will provide the basis for site suitability determination.

LICENSING TOPICAL REPORTS (LTRs)

Licensing Topical Reports will address critical issues/positions which require NRC management attention, possibly through the Commission level, including areas addressed by NRC "objections". LTRs will be prepared by DOE/HQ regulatory organization, assisted by the NNWSI Project, with technical support from participant PI's, where needed.



RATIONALE FOR USE OF THE "BUILDING BLOCK" APPROACH IN THE DEVELOPMENT OF REGULATORY COMPLIANCE DOCUMENTATION

The NNWSI Project has proposed using a "building block" approach, utilizing three levels of regulatory reports, to develop the results of site characterization, design, and performance assessment activities into documentation of regulatory compliance and issue resolution which will serve as input to the License Application (LA) and site suitability determination. These reports are Information Need Reports (INRs), Issue Resolution Reports (IRRs), and Licensing Topical Reports (LTRs). The primary purpose of this three-level approach is to enable the Project to resolve regulatory concerns as early in the licensing process and at the lowest level of reporting and interaction with outside organizations (NRC, State of Nevada, etc.) as possible.

Position Papers (PPs), which include Site Investigation Reports and Design and Performance Assessment Information Need Reports, are the initial level of regulatory compliance documentation. They will report concise subjects that can be reviewed by a fairly "narrow" regulatory audience. Virtually all subjects of regulatory concern will be covered by a PP, and these reports are envisioned as the primary vehicle for interaction with the NRC to establish NNWSI Project positions. Position Papers will contain more technical detail than higher level regulatory reports, and PP preparation will begin as soon as information needed from supporting Study Reports (SRs) is available. PPs will be prepared jointly by participant Principal Investigators (PIs) and NNWSI Project regulatory organizations. Selection of PP subjects will be primarily keyed to a "bottom up" approach, in which report topics are largely determined based upon the technical milestones described in Site Characterization Plan (SCP) Chapter 8.3 and the Study Plans.

Issue Resolution Reports will address resolution of the issues of the DGR Issues Hierarchy, as developed from 10 CFR 60 and 10 CFR 960 and outlined in Chapter 8.5 of the SCP. IRR content structuring for 10 CFR 60 issues will be keyed to NRC licensing requirements as addressed by the Safety Analysis Report (SAR) outline currently under development by DOE/HQ. Issue Resolution Reports will address much broader subject areas than PPs, and most IRRs will be produced by integration of the input from a number of PPs and their supporting SRs. IRRs will be prepared primarily DOE/HQ regulatory organization, assisted by the NNWSI Project, with technical support from participant PIs, where needed. It is currently expected that IRRs will be cited as references in both in the SAR and site suitability determination.

Licensing Topical Reports will address critical issues and positions that DOE has been unable to resolve at the PP or IRR levels. LTRs will require DOE and NRC management attention, possibly through the Commission level. Licensing Topical Reports will be produced by integrating the input of supporting IRRs, PPs, and SRs, and other information, as required. LTRs will also be cited directly in the SAR, and it is anticipated that some LTRs may become component sections of the SAR. Licensing Topical Reports will be written by DOE/HQ

regulatory organizations, assisted by the NNWSI Project, with technical support from participant PIs, as needed.

The "building block" approach provides the Project with several advantages over a less-structured approach, as follows.

1. Because the PPs cover relatively narrow subjects, their production is less likely to be delayed awaiting component information from multiple studies or participant groups. This allows an earlier start for most PPs than for wider-scope reports.
2. Because of the early availability and narrow scope of PPs, they should move through the review and interaction cycle much faster than would larger reports, allowing the Project to establish regulatory positions earlier than would otherwise be possible.
3. Since much of the content of IRRs will have already been through the review, interaction, and position establishment process as PPs, review and approval of these larger documents should proceed much faster than would otherwise be possible.
4. As PPs are technical-subject oriented, they should be usable in the preparation of any PP or LTR of which this subject forms a component part.
5. Since IRRs will have been keyed to the SAR content from the outset, writing of the SAR should be considerably streamlined.

ENCLOSURE 2

**Presentation on the Proposed Process for
Developing Study Plans**

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Primary Study Plan
Action Plan

1. Select a Study Plan from priority list, identify principal activity within plan, if more than 1
2. Select uncommitted team and leader for package

<u>Participant</u>	PI & helpers
<u>SAIC</u>	process coordinator
<u>Other Participants</u>	project review
<u>QA</u>	QA
<u>HQ</u>	review coordinator

3. Review status of SCP and determine current status of study for priority
4. Prepare list of products:

Study Plan
Experiment procedure
Technical procedure
Hierarchical list of QA documents

- 196-17
- Participant QAPP
- QALA package
- QA procedures
- Personnel certification

Data Flow requirements

- draft data compilation forms

5. Prepare list of Precursor requirements and documentation

Land access agreements
Env. permitting
NTSO requirements

6. Present contents of package at TPO meeting
7. Prepare time-phased network (start to completion)
8. Complete Study Plan
 - Project review
 - HQ review
 - NRC interaction (schedule and conduct meeting)

9. Complete balance of products
10. Conduct readiness review
11. Present status at TPO meeting (present lessons learned)
12. Begin field operations
13. Write data report
14. Write interpretative report
15. Analyze lessons learned

ENCLOSURE 3

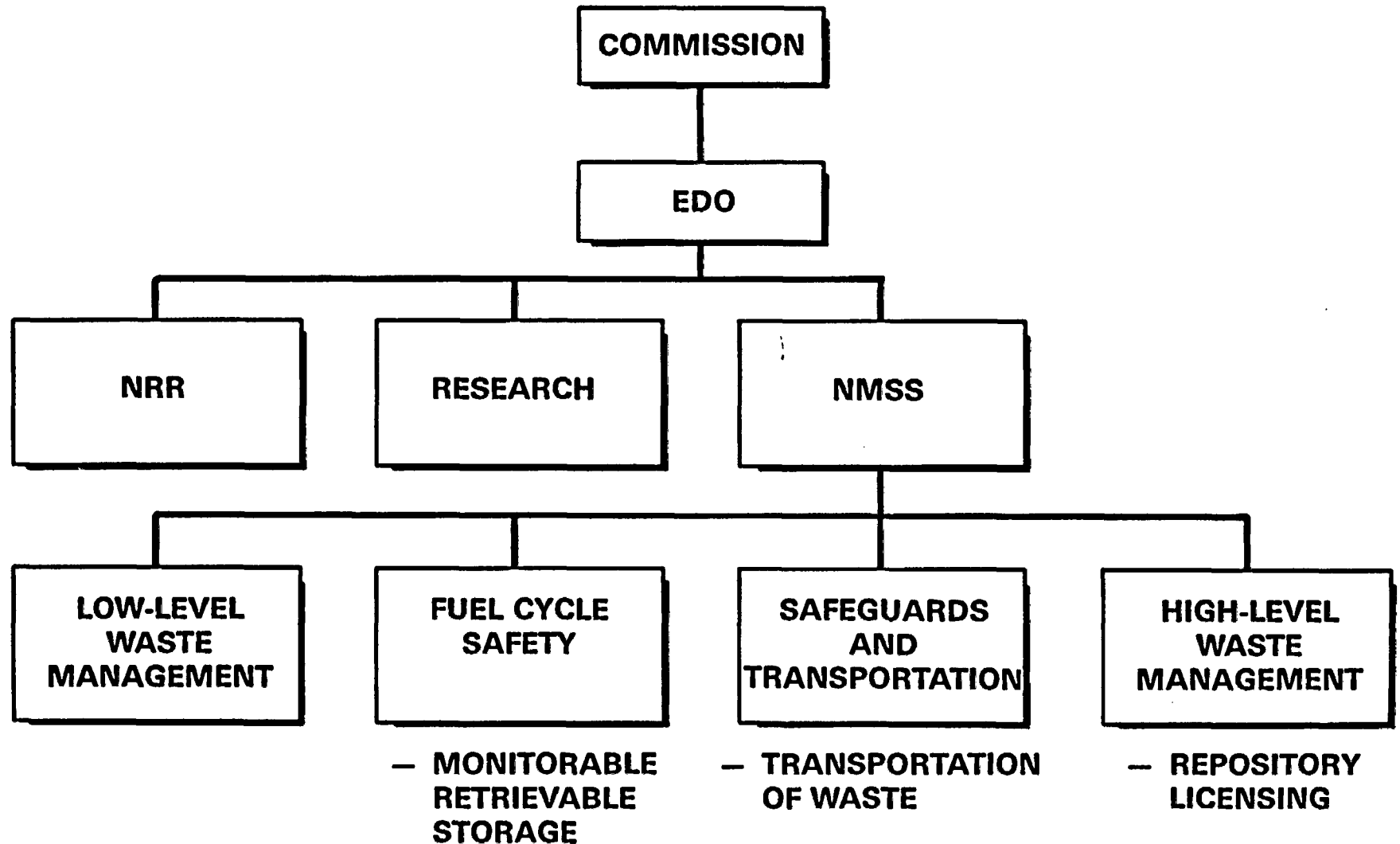
The NRC Regulatory Role

THE NRC REGULATORY ROLE

JOE HOLONICH

**SENIOR PROJECT MANAGER
DIVISION OF HIGH-LEVEL WASTE MANAGEMENT
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS**

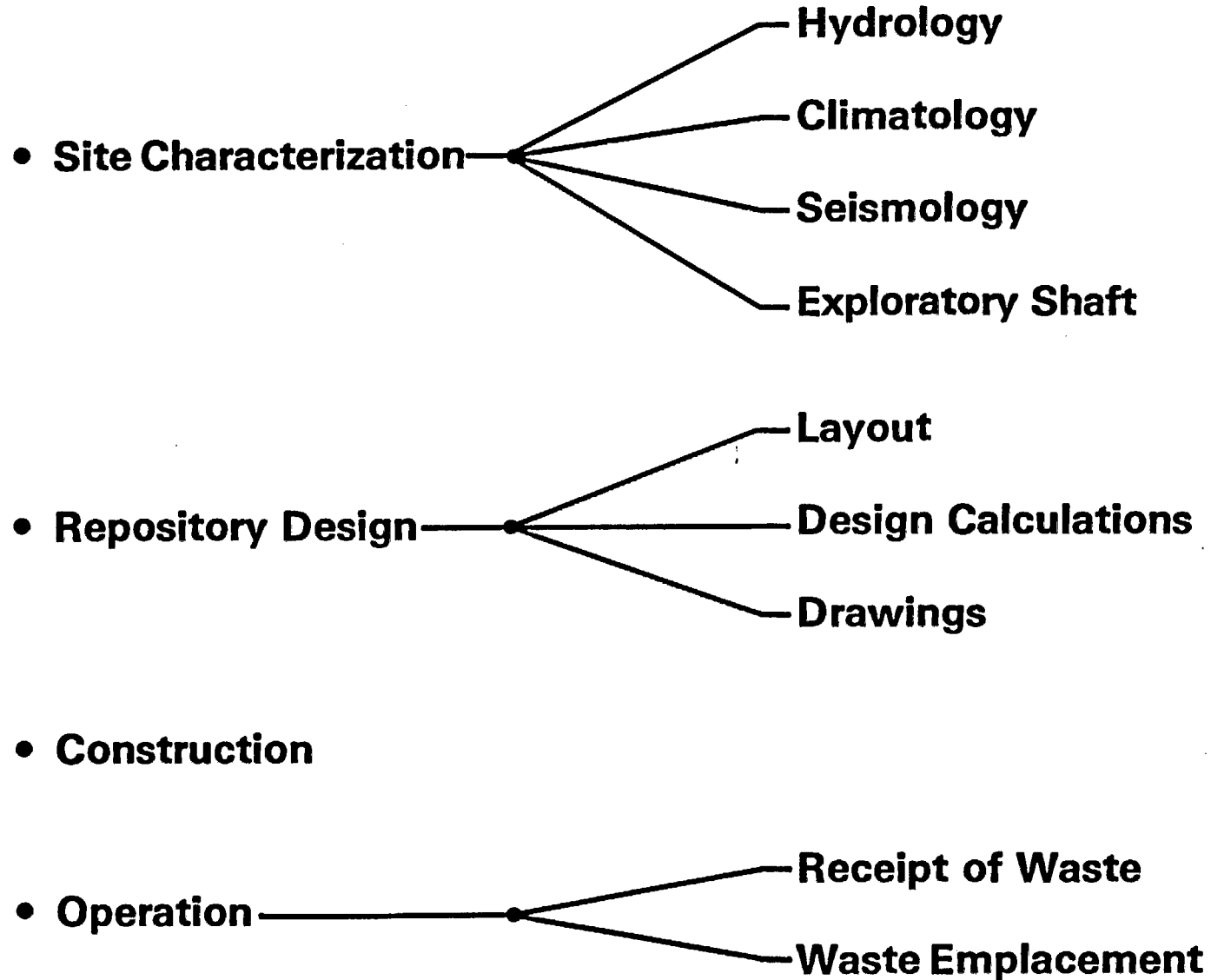
U.S. NRC ORGANIZATION MAJOR PROGRAM OFFICES



BACKGROUND ON NRC

- **Independent regulatory agency**
- **Approximately 3,000 staff members**
- **Responsible for licensing of civilian use of radioactive materials**
 - **Reactors**
 - **Special nuclear, source, and byproduct material**
 - **Transportation**
 - **Low-Level and High-Level Waste**

DOE'S ACTIVITIES



NRC REVIEW

- **Audit Approach**
 - **SCP evaluation**
 - **Design review**
 - **License application evaluation**
 - **Audits**
 - **Inspections**

NRC POSITION ON PRE-LICENSING

- 1. As the Commission noted in its development of 10 CFR Part 60, during site characterization there would be no facility for storage of HLW, and therefore, no basis for the exercise of the Commission's Licensing Authority. (46 Federal Register 13971, 13975, February 25, 1981).**
- 2. Furthermore, the Commission stated that "The Commission cannot direct the Department to comply with the provisions for involving it during site characterization activities." (44 Federal Register 70408, 70409, December 6, 1979).**
- 3. However, the Commission also noted that "[A]lthough the Commission cannot direct the Department to comply with the provisions for involving it during the site characterization activities, any failure to do so is likely to result in imprudent expenditures and subsequent delays, and ultimately could result in the denial of the application for the proposed site."**

NRC PRELICENSING ACTIVITIES

- **NRC does have an interest in DOE pre-licensing activities**
- **Satisfy NRC interest through “informal” but documented means**
 - **Reports**
 - **Meetings**
 - **Site visits**
 - **Audit observations**
- **DOE’s interest is to resolve differing views during pre-licensing stage**
- **Cannot exercise jurisdiction until DOE becomes an applicant, i.e., inspection and enforcement**

IMPORTANCE OF DOE QA

- **NRC cannot review or inspect everything**
- **DOE QA**
 - **Structured and systematic method of obtaining facts and data and performing analyses**
 - **Assurance work done properly**
- **DOE records**
 - **Supporting documentation for NRC licensing decision**
 - **Provide traceability of work**
 - **Lack of complete records; NRC cannot make a finding that work was done properly**

"It's not data unless the NRC says it's data"

"Yogi" Gertz

ENCLOSURE 4

**Staff Concerns on the
USGS DOE/WMPD Audit**

Staff Concerns on the
USGS Menlo Park Audit

- Scope of audit should have been expanded
 - All applicable Appendix B Criteria
 - Other SIPs and SIP development
 - Issues arising from checklist
- More information on auditor qualifications
- Technical specialist did not follow checklist
- Needed equipment not available
- Poor coordination of meetings
 - No team interactions
 - USGS personnel present at first caucus
 - No significance of findings discussed
 - No adjustment of team members
 - No root cause determination
- Length of audit too short
- Technical specialist were too detailed
- Order of audits; Denver vs Mento Park