WM Record File 101

WM Project 10

Docket No.

JUN 25 1985

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MEMORANDUM FOR: Robert Wright
Repository Projects Branch
Division of Waste Management, NMSS

FROM: Kristin Westbrook
Geology-Geophysics Branch
Geotechnical Branch
Division of Waste Management, NMSS

SUBJECT: PROBLEMS WITH TELEPHONE COMMUNICATIONS - ACCESS TO ROCKWELL SCIENTISTS DIFFICULT AT BWIP PROJECT

Background

By memorandum to you dated April 29, 1985, I indicated that I was having difficulty determining, in a comprehensive way, what information exists for the BWIP in geology/geophysics. I am approaching this problem by first determining what information is currently being collected or planned in the near future.

In my discussions with you, my Branch Chief - Malcolm Knapp, and my Section Leader - Philip Justus, I have been directed to use the communicator system as one of the primary means to understand the geology/geophysics program at BWIP. This system is formally established in the September 18, 1984, DOE/NRC Site Specific Procedural Agreement (Appendix 1 - BWIP; Enclosure 1 of this memorandum). The specific authority of BWIP's communicators is in an August 16, 1983 letter from DOE's O.L. Olson to you (Enclosure 2).

Earlier this year, you informed the BWIP team that DOE was concerned about not being aware of NRC communications with RHO. In my view, DOE's concern was difficult to understand because the August 16, 1983 letter cited above requires RHO to send DOE a telecon. The NRC BWIP team were directed by you to call a DOE contact before calling RHO if we were going to discuss anything of substance. This policy did not correspond to the written guidance and agreements. After pointing out these facts, I received a note from Philip Justus (Enclosure 3 of this memorandum) directing me to follow the supplemental procedures.

Current Problems

Notification to DOE of planned telecommunications is not actually what DOE seems to want. Rather, DOE is requiring prior approval of contacts with RHO. DOE has recently refused to allow telecommunications of substance to take place

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with RHO staff, has required DOE to be present during discussions with RHO, and has required scheduling of calls to be handled by DOE. These actions by DOE are not consistent with any of the written guidance I have received including the modified procedures outlined by Philip Justus (Enclosure 3 of this memorandum).

Specific examples of recent problems include: (1) refusal by DOE to allow telecommunications of substance regarding seismology as I requested to DOE and RHO in May 1985 and (2) delays and questioning of the appropriateness of NRC attempts to determine the status and planned release of current geology/geophysics work in June 1985. For documentation of delays, see telecon (Enclosure 4).

This paragraph documents DOE's questions on the appropriateness of NRC's attempts to determine who is performing current geological studies as RHO subcontractors. It is possible that DOE has not been publicly releasing contractor reports in a timely manner. For example, an Aeroservices company contractor report from FY1980 for an aeromagnetic survey is not on the November 1983 "Accession List." It is also not on the July, 1984 "Accession List". It is listed on the September, 1984 "Accession List" with a date of 9/30/80. The September 1984 entry does not have an asterisk next to it but all new entries are supposed to be designated by an asterisk when they first appear on the list. It is appropriate for NRC to know the names of RHO subcontractors for all current BWIP studies and I intend to continue compiling this information for geology/geophysics.

DOE's recent refusal to allow discussions between NRC's and RHO's seismologists apparently was because DOE viewed these discussions as possibly involving interpretations. The seismology topics NRC requested discussion on with RHO are as follows:

- o microearthquake swarms in RRL-impacts on repository design
- o microearthquake analysis techniques, such as - stereo pairs, down dip projections, spectral corner frequencies
- o single event earthquake analysis techniques such as - focal mechanisms, moments
- o approaches for analysis of hydrologic relationships to single earthquakes and to swarm earthquakes

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I am concerned that telephone restrictions on interpretive discussions for geology eliminates the exchange of scientific information by telephone. Unless we have our hands on a rock sample or are standing on an outcrop, all communications of substance in geology are interpretive.

Upon request, I can provide further details about the various points contained in the memorandum.

/s/

Kristin Westbrook
Geology-Geophysics Section
Geotechnical Branch
Division of Waste Management, NMSS

Enclosures:
As stated

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United States Government — Enclosure 1 — Department of Energy

memorandum

COPIES TO ALL RP STAFF

DATE: September 18, 1984

REPLY TO ATTN OF: RW-23

SUBJECT: DOE/NRC Site-Specific Procedural Agreement for Geologic Repository Site Investigation and Characterization Program

TO:

R. Stein, RW-23	C. Vieth, NNWSI
C. Head, RW-23	C. Baker, CRPO
S. Mann, CRPO	L. Casey, SRPO
J. Neff, SRPO	J. Mecca, BWIP
L. Olson, BWIP	J. Szymanski, NNWSI

After a long and arduous negotiation and signing process, the DOE/NRC Site-Specific Procedural Agreement has been completed and is hereby issued for use. Appendix 7 is, of course, still under development and will be issued later. Thank you all for your help in completing this agreement.

J W Bennett

J. William Bennett
Acting Associate Director
Office of Geologic Repositories

Attachment:
Signed copy of DOE/NRC
Site-Specific Procedural Agreement

cc:

R.E. Browning, NRC	(w/o attach.)
R. Purple, RW-43	(w/attach.)
J. Fiore, RW-22	(w/attach.)
R. Balney, RW-22	(w/attach.)
M. Frei, RW-23	(w/attach.)
A. Jelasic, RW-24	(w/attach.)
C. Cooley, RW-24	(w/attach.)
E. Burton, RW-25	(w/attach.)
B. Gale, RW-25	(w/attach.)
G. Parker, RW-25	(w/attach.)

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Appendix 1 - BWIP

1. Points of contact between NRC and DOE projects

   a. Formal Communications

      BWIP Project Manager to and from NRC BWIP Project Section Leader

DOE	NRC
Project Office Manager U.S. Department of Energy Richland Operations Office BWI Project Office P.O. Box 550 Richland, WA 99352	Section Leader BWIP Project Section Division of Waste Management U.S. Nuclear Regulatory Commission 7915 Eastern Avenue Silver Spring, MD 20910

   b. Technical Communications

Area	NRC	BWIP Staff/ Contractors
Performance Assessment	Salt Project Section Leader or designee	R. T. Wilde
Repository Design	Mining, Geoengineering Facility Design Section Leader or designee	R. J. Gimera
Quality Assurance	BWIP Project Section Leader or designee	M. S. Karol
Geology	Geology/Geophysics Section Leader or designee	S. M. Price
Geochemistry	Geochemistry Section Leader or designee	P. F. Salter
Hydrogeology	Hydrology Section Leader or designee	G. S. Hunt
Waste Package	Materials Engineering Section Leader or designee	M. J. Smith
General	BWIP Project Section Leader or designee	J. Mecca

#/kmt 7/30 BWIP file

Enclosure 2

WM Record File 101.2 WM Project 10 Docket No. PDR ✓ LPDR ✓

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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

AUG 16 1983

Dr. Robert J. Wright
Senior Technical Advisor
High Level Waste Technical
Development Branch
Division of Waste Management
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Wright:

GUIDELINES FOR NRC INTERFACE

During your visit to Richland the week of July 11, guidelines for technical interface between NRC and DOE and designated contacts for information exchange were discussed. Enclosed is a list of designated BWIP communicators and guidelines for implementing their information exchange responsibilities. NRC's staff counterparts to the BWIP communicators were identified by you and attached to the Summary Meeting Notes - DOE/NRC Meeting on Hydrology Testing - Richland, Washington, July 11-15, 1983.

These contacts between the NRC and DOE/Rockwell staff will allow exchange of technical information and status of project activities. However, as indicated in the enclosed guidelines, official requests or exchange of information between NRC and DOE will continue to be handled by my office. If experience confirms the effectiveness of these arrangements, they should be incorporated in the procedural agreement between the NRC and BWIP.

If you have any questions covering this material, please contact Dave Squires of my staff.

Very truly yours,

O. L. Olson, Project Manager
Basalt Waste Isolation Project Office

BWI:DJS

Enclosure

cc, w/encl: M. W. Frei, DOE-HQ
R. A. Deju, Rockwell

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RECOMMENDED

GUIDELINES FOR TECHNICAL INTERFACE BETWEEN THE NUCLEAR REGULATORY COMMISSION, THE DEPARTMENT OF ENERGY-RICHLAND OPERATIONS OFFICE, AND ROCKWELL HANFORD OPERATIONS REGARDING THE BASALT WASTE ISOLATION PROJECT

The purpose of these guidelines is to streamline the flow of technical information between the staff of the Basalt Waste Isolation Project (BWIP) [both the Department of Energy (DOE) and Rockwell Hanford Operations (Rockwell)] and the Nuclear Regulatory Commission (NRC) staff. Timely, accurate, and efficient exchanges are of paramount importance in this process of pre-licensing consultation.

DESIGNATED COMMUNICATORS

The basis for the interface will be the following designated communicators in each main area of study. The communicators are knowledgeable experts in their fields and hold a current managerial position of at least group manager. With the exception of Quality Assurance, all designated communicators are Rockwell BWIP staff members.

Performance Assessment	R. T. Wilde (FTS 444-7207) Manager, Systems Department
Repository Design	R. J. Gimera (FTS 444-8919) Associate Director, BWIP
Quality Assurance	M. S. Karol (FTS 444-7305) Manager, Quality Assurance DOE-Richland Operations Office G. J. Bracken (Alternate) FTS 444-6579
Geology	S. M. Price (FTS 444-2421) Manager, Geosciences Group
Geochemistry	P. F. Salter (FTS 444-4200) Manager, Waste Package Design and Geochemistry Group
Hydrogeology	G. S. Hunt (FTS 444-7981) Manager, Site Department
Waste Package	M. J. Smith (FTS 440-3535) Manager, Waste Package Department

Counterparts to each of the above BWIP communicators have been named from within the NRC staff. (Summary Meeting Notes - DOE/NRC Meeting on Hydrology Testing - Richland, Washington - July 11-15, 1983.)

AUTHORITY OF COMMUNICATORS

1. The BWIP communicators are authorized to have open discussions and exchange of views with NRC counterparts on exchanged information and related technical matters.

2. The BWIP communicators are authorized to accept telephone calls directly from their NRC counterpart communicators.

   a. If the NRC requests technical information which the BWIP communicator can provide during the initial call, he/she is authorized to do so.

   b. If the NRC requests technical information which the BWIP communicator is unable to answer during the initial call, a date for providing the information should be agreed upon. The BWIP communicator is required to provide the information on or before the agreed upon date. If the information requires a transmittal, the transmittal will be by DOE.

3. The BWIP communicators are authorized to contact the NRC by telephone to status pertinent areas of the BWIP.

4. BWIP communicators are not authorized to address NRC requests on issues outside their areas of expertise but may contact the communicator in that area in responding to NRC inquiries.

5. Only technical information pertaining to BWIP may be discussed by the BWIP communicator. The NRC must contact the DOE directly with requests on programmatic matters, legal questions, tours and visits to BWIP, and other non-technical questions. Official correspondence is to be transmitted by DOE.

6. Requests in writing from the NRC should be handled as they are currently. The NRC writes directly to DOE and DOE responds to the request.

7. The BWIP communicators do not have the authority to make commitments on behalf of Rockwell or DOE other than to verbally respond to NRC inquiries.

DOCUMENTATION OF INTERFACE

1. The BWIP communicator shall, within two working days of any telephone conversation with NRC, complete a Telecon Report. The Telecon Report should be of sufficient detail to highlight issues discussed and information provided and should be typed. The originating BWIP communicator should sign the original and retain a copy. The following are to be on distribution to receive copies of the Telecon Report:

- Manager, Office of Licensing
- BWIP Director
- Originator's end function manager, if applicable
- DOE-Richland Operations Office, Basalt Waste Isolation Project Office (BWIPO)
- Records Retention Center
- NRC communicator
- Resident NRC Representative
- NRC Site Project Manager

2. In addition to writing the Telecon Report, the communicator is responsible to maintain copies of his/her Telecon Reports.

3. The Manager, Office of Licensing, is responsible to maintain copies of all Telecon Reports.

RESPONSIBILITIES OF DOE-RL

1. The DOE-RL is responsible for direct response to NRC requests pertaining to policy decisions, legal questions, tours of and visits to BWIP, and other technical and non-technical questions.

2. The DOE-RL is responsible for direct response to all NRC requests submitted in writing.

3. The DOE-RL is responsible for transmittal of all written information requested through designated communicators.