

NOV 5 1984

DISTRIBUTION
WM S/F 3101.1
WMP r/f
NMSS r/f
CF
REBrowning
MJBell
JBunting
PAItomare
MRKnapp
LBarrett
LBHigginbotham
HJMiller
RJWright & r/f
RRBoyle
SCoplan
JKennedy
JLinehan
PDR
~~LPDR, B~~

MEMORANDUM FOR: Hubert J. Miller, Chief
Repository Projects Branch
Division of Waste Management

FROM: Robert J. Wright
Senior Technical Advisor
Repository Projects Branch
Division of Waste Management

SUBJECT: TRACKING SITE ISSUES

I believe that a useful starting point in thinking about issue identification and tracking is provided by the two-year experience of ourselves, and others, in identifying and following the issues at BWIP. With this in mind, I summarize below source of the key the events in this experience, discuss them and then offer some suggestions.

Key events in identification of issues by NRC and others

1. In preparation for the review of DOE's Site Characterization Report for BWIP (SCR), the NRC review group identified a set of issues. These are based on the required assessments necessary to independently evaluate, during licensing, the performance of a proposed repository. An issue "is a question about a site that must be answered or resolved to complete licensing assessments of the site and design suitability in terms of 10CFR60." For BWIP, 141 issues were identified:

Performance assessment	11
Groundwater	23
Waste package	27
Geochemistry	29
Repository design	20
Geology	31
	<u>141</u>

These issues were used for our review of the SCR and form the basis for the ensuing interactions with BWIP.

2. In DOE's SCR, published in November 1983, DOE divided issues in another way. Three "key issues" and 12 "issues" were identified. Also, among the scores of "work elements" are some that contain some matters included in the NRC issues.

8407260090 840705
PDR WASTE
WM-10 PDR

WM Record File

101

WM Project 10

Docket No. _____

PDR

LPDR

Distribution:

(Return to WM, 623-SS)

882

3. In Appendix C of NUREG-0960, we reported that the issues identified by NRC cover the same overall ground as covered by DOE in the three key issues, twelve issues and certain of the work elements. The SCR presentation of key issues, issues and work elements was correlated with the 141 NRC issues in Table C-2 of Appendix C.
4. On May 11, 1983, the U. S. Geological Survey released review comments on DOE's SCR. The document addresses only earth-science issues in 50 single-spaced pages. It is in narrative form and does not isolate individual issues as such. I estimate that 50 to 100 issues may be embraced within the technical matters that are discussed in the narrative.
5. During May 1983, Rockwell prepared a recapitulation of the "comments and concerns" expressed by NRC in NUREG-0960. We discussed these, to ensure clarity and accuracy, with DOE on June 13-17. The corrected tabulation (BWI-DIC-001) was published September 1. The 304 pages probably contain 900 open items, of which all are sub-sets of the 141 NRC issues.
6. During the geochemistry workshop, January 9-12, 1984, Rockwell released a list of 25 geochemical issues. In our comments on this material we stated that we consider these to be open items, "issues" being reserved for those identified in NUREG-0960.
7. On April 20, 1984, Rockwell released (BWI-DIC-003) responses to the state of Washington's critique of the SCR. The critique had been prepared by Golder Associates. The responses, in 94 pages, identify about 250 specific "comments and concerns" of the state. This document is now in the hands of the BWIP team for correlation of the comments and concerns with the NRC issues.
8. On May 29, DOE released (BWI-DIC-002) Rockwell's responses made by the U.S. Geological Survey on the SCR (event 4, above). Four "major open items" and about 170 "general comments" are identified and discussed in 97 pages. This document is now in the hands of the BWIP team for correlation of the major open items and general comments with the NRC issues.

Discussion

The above chronology shows that the questions to be resolved at licensing time can be collected, expressed, divided, and combined in a myriad of ways. Different approaches may be needed for the purposes of different groups. However, for tracking purposes we need a single approach that is logical, consistent, and traceable. Further, if it is to serve the purposes of a broad

OFC	:WMP:mkg	:WMP	:	:	:	:	:
NAME	:RJWright	:HJMiller	:	:	:	:	:
DATE	:84/07/02	:7/ /84	:	:	:	:	:

range of users, the issue list must be understandable and not overly complicated.

Applying the foregoing, I believe that the BWIP issues, as expressed in NUREG-0960, serve us well. They are properly rooted in performance objectives of 10CFR60. They break down complex questions into manageable parts. They provide a reference standard against which other sets of licensing questions concerns, comments and problems are correlated and calibrated. They are reasonably understandable.

It should not be claimed, however, that the NUREG issues are perfect and should remain unchanged for all time. Some imperfections have been identified; for example, the environmental issues need expansion. All the issues need periodic reexamination in the light of increased knowledge and experience. When changes are advisable, an orderly procedure (yet to be developed) needs to be followed, something like the "change order" in engineering circles.

Suggestions

1. For tracking purposes, I suggest adoption of the sets of issues now under development for each of the three projects. Each set will consists of the issues identified in the umbrella site technical positions. For BWIP, the issues in umbrella site technical position will be based on those in NUREG-0960, Appendix C.
2. A change order system is needed to permit orderly, documented, evolutionary changes in issues when needed.
3. Issues, concerns, comments, questions and observations of other parties should be tracked by reference to the NRC issues.
4. It is essential that the input to the tracking system be provided by the NRC people most knowledgeable about the sites. These are the site technical teams and the project managements.

Robert J. Wright
Senior Technical Advisor
Repository Projects Branch
Division of Waste Management

OFC	:WMRP:mkg	:WMRP	:	:	:	:	:
NAME	:RJK Wright	:HJM Miller	:	:	:	:	:
DATE	:84/07/02	:7/ /84	:	:	:	:	:
