



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20545

WM Record File

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WM Project = 10

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May 31, 1984

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MEMORANDUM FOR: Robert E. Browning, Director
Division of Waste Management

FROM: F. Robert Cook, Senior On-Site Licensing
Representative, Basalt Waste Isolation
Project (BWIP)

SUBJECT: BWIP SITE REPORT FOR PERIOD OF MAY 13-26,
1984

I continued my review of instrumentation being used in hydrologic testing. My conclusions are similar to those expressed by Golder Associates in various letters and comments of their reviewers, stemming from the January, 1984, hydrologic data review here on-site. Specifically, the use of open piezometers to determine at depth potentiometric conditions is not adequate because of the uncertainty in the characteristics of the water column. In addition instrumentation design control within BWIP quality assurance activities was not effective or was not implemented. The NRC Staff letter which was recently forwarded to Mr. Olson seems to draw the same conclusions, relative to the use of piezometer tubes and other bore holes for head measurements; but it is my judgement, based on DOE/BWIP reactions, that it under emphasizes the issue.

I consider the instrumentation accuracy/instrument design issue to be of utmost importance. I recommend the issue be brought to the attention of the DOE OCRWM Director, since I conclude it reflects a major quality assurance deficiency and appears to have potential program wide significance. I consider the Golder letters referred to above should be used to provide information/analyses concerning the issue to support our concern. I recommend these Golder letters be formally sent to DOE headquarters as well as the Richland Operations Office. We should not wait on our planned QA review to further assess this issue, since it appears the schedule for the review is slipping.

F. Robert Cook
F. Robert Cook
Senior On-Site Licensing
Representative

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