

MS 623 SS

April 16, 1984

WM Record File
101

WM Project 10
Docket No.
PDR
LPDR

Distribution: REB HM
1 MJB JG
JOB MK
(Return to WM, 623-SS) rec'd by Wright
04/18/84

To: R. J. Wright, Waste Management Projects Branch, BWIP Project
From: F. R. Cook, Sr., On-Site Licensing Representative, BWIP Project
Subject: CURRENT BWIP PROJECT ISSUES FOR DISCUSSION WITH DAVIS

Per your request today I have reviewed my notes and identified eight problem areas for discussion with Davis. They follow:

1. Access to technical information and people by the Site Rep. is currently a problem. DOE has indicated that they want to limit access to a selected few individuals in DOE and their contractors. They don't want the Rep. to have any contact with RHO subcontractors. (this appears to be as problem at other sites also. Their reasoning is that he will take too much time of the people he talks to, and hence interfere with the contractors meeting schedules. The other reason, which I believe is the prime reason, is that they are concerned that by asking questions and identifying Staff viewpoints and concerns to the respective management responsible for the technical activities that I am managing the project. Of particular concern were the sessions which were formally set up at the geochemistry workshop to review procedural control of testing at RHO and their subcontractors. Various QA matters were invoked by Rockwell as a result of the questions I asked (and Staff viewpoints that I noted that related to the questions) and DOE'S own QA audit which followed shortly after the session. Rockwell management does not conclude that my questioning is defacto managing. They welcome the questions and identification of Staff concerns. The issue is at the DOE level.

Also tied up with this issue is the applicability of 10CFR21 to contractor design activities including their R&D work. I refer you to my weekly memo for the second week in February for discussion of this issue. Rockwell is currently reviewing the applicability of Part 21 to their activities and their subcontractor activities. I would note that applicability of Part 19 is also a question in my mind.

2. Implementation of satisfactory QA procedures at BWIP is a current problem as it appears to be at other projects. The introduction of Stone and Webster in the bedded salt project in Texas would appear to be a step in the correct direction since they have had extensive experience in licensing reactors and should input generally applicable procedural control in the

B405150046 B40416
PDR WASTE
WM-10 PDR

ORIGINAL IS IN TELECOPY FORM

192
1 00774

2

geotechnical arena.

3. The definitions of the "fastest path of likely radionuclide travel" and the "disturbed zone" are key definitions which need to be resolved between the Staff and BWIP to allow BWIP to assess the adequacy of their hydrologic test plans to determine groundwater travel time and confidence in this parameter.

4. The apparant conflict of interest issue with Golder Associates and others working for DOE and NRC at the same time needs to be resolved.

5. The question of resources--gas, oil, coal, and warter in particular--needs to be addressed by BWIP.

6. Related to #3 is EPA action to define the assessible environment by referring to potable water supplies and the effects of potential irrigation on the fastest travel time discussed in #3. These are both questions or issues the resolution of which could determine the adequacy of the site, assuming no change in the 1000 year travel time requirement is granted.

7. I believe BWIP will announce a major change in the conceptual design they plan to pursue in the near future. This will indicate substantial changes in our TA and RES contracts are warranted to reflect the changes they are making.

8. The question of thermal-mechanical testing in-situ needs to be resolved. It is somewhat tied to the definition of the disturbed zone discussed in #3 above. Also an obvious question is whether or not the disturbed zone will effectively connect the engineered portion of the repository with the assessible environment or high conductivity zones leading to the assessible environment. Assuming the engineered system will not meet future EPA standards by itself, the thermal-mechanical testing and its effect on the hydrologic parameters around the engineered system is a key issue to resolve during site characterization.

F. Robert Cook

F. Robert Cook
Sr. On-Site Licensing Representative

cc. REBrowning, HJMiller, JTGreeves, JDBunting, MRKnapp

192

MS 623 SS

April 16, 1984

WM Record File 101 WM Project 10
 Docket No. _____
 PDR
 LPDR
 Distribution: REB HM RWright
MJB JG
JOB MK
 (Return to WM, 623-SS) rec'd by Wright
 4/18/84

To: R. J. Wright, Waste Management Projects Branch, BWIP Project
 From: F. R. Cook, Sr., On-Site Licensing Representative, BWIP Project
 Subject: CURRENT BWIP PROJECT ISSUES FOR DISCUSSION WITH DAVIS.

Per your request today I have reviewed my notes and identified eight problem areas for discussion with Davis. They follow:

1. Access to technical information and people by the Site Rep. is currently a problem. DOE has indicated that they want to limit access to a selected few individuals in DOE and their contractors. They don't want the Rep. to have any contact with RHD subcontractors. (this appears to be as problem at other sites also. Their reasoning is that he will take too much time of the people he talks to, and hence interfere with the contractors meeting schedules. The other reason, which I believe is the prime reason, is that they are concerned that by asking questions and identifying Staff viewpoints and concerns to the respective management responsible for the technical activities that I am managing the project. Of particular concern were the sessions which were formally set up at the geochemistry workshop to review procedural control of testing at RHD and their subcontractors. Various QA matters were invoked by Rockwell as a result of the questions I asked (and Staff viewpoints that I noted that related to the questions) and DOE'S own QA audit which followed shortly after the session. Rockwell management does not conclude that my questioning is defacto managing. They welcome the questions and identification of Staff concerns. The issue is at the DOE level.

Also tied up with this issue is the applicability of 10CFR21 to contractor design activities including their R&D work. I refer you to my weekly memo for the second week in February for discussion of this issue. Rockwell is currently reviewing the applicability of Part 21 to their activities and their subcontractor activities. I would note that applicability of Part 19 is also a question in my mind.

2. Implementation of satisfactory QA procedures at BWIP is a current problem as it appears to be at other projects. The introduction of Stone and Webster in the bedded salt project in Texas would appear to be a step in the correct direction since they have had extensive experience in licensing reactors and should input generally applicable procedural control in the

ORIGINAL IS IN TELECOPY FORM

192
 1 05774
 Susanna 4/27/84

2

geotechnical arena.

3. The definitions of the "fastest path of likely radionuclide travel" and the "disturbed zone" are key definitions which need to be resolved between the Staff and BWIP to allow BWIP to assess the adequacy of their hydrologic test plans to determine groundwater travel time and confidence in this parameter.

4. The apparent conflict of interest issue with Golder Associates and others working for DOE and NRC at the same time needs to be resolved.

5. The question of resources--gas, oil, coal, and water in particular--needs to be addressed by BWIP.

6. Related to #3 is EPA action to define the assessible environment by referring to potable water supplies and the effects of potential irrigation on the fastest travel time discussed in #3. These are both questions or issues the resolution of which could determine the adequacy of the site, assuming no change in the 1000 year travel time requirement is granted.

7. I believe BWIP will announce a major change in the conceptual design they plan to pursue in the near future. This will indicate substantial changes in our TA and RES contracts are warranted to reflect the changes they are making.

8. The question of thermal-mechanical testing in-situ needs to be resolved. It is somewhat tied to the definition of the disturbed zone discussed in #3 above. Also an obvious question is whether or not the disturbed zone will effectively connect the engineered portion of the repository with the assessible environment or high conductivity zones leading to the assessible environment. Assuming the engineered system will not meet future EPA standards by itself, the thermal-mechanical testing and its effect on the hydrologic parameters around the engineered system is a key issue to resolve during site characterization.

F. Robert Cook

F. Robert Cook
Sr. On-Site Licensing Representative

cc. REBrowning, HJMiller, JTGreeves, JDBunting, MRKnapp

192