

Rdg 2



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

Seth -

Attached is suggested  
wording for the NRC/DSE  
MOU as it concerns  
Site Reps.

FKlook  
2/8/84.

WM Record File

101

WM Project

10

Docket No.

PDR

LPDR

Distribution:

(Return to WM, 623-SS)

Copy to Bunting  
2/8/84

8508140147 840208  
PDR WASTE  
WM-10 PDR

The NRC Site Resident Licensing Representative shall be afforded immediate unfettered access to personnel, project records and facilities equivalent to access provided DOE, DOE Contractor or Subcontractor employees, at the respective site, geologic repository operations area and adjacent areas, research facilities and other contractor and subcontractor areas. Access will be subject to applicable requirements for proper identification and compliance with applicable access control measures for security, radiological protection and personnel safety applied to regular employees. Records as used above shall include any records which potentially would be subject to discovery, either public or confidential, at a later date during a licensing proceeding for the respective repository. Included in this category are all records required to be kept by DOE, DOE Contractors and Subcontractors per policies, quality assurance requirements, applicable laws, government regulations and NRC rules. Unscheduled consultation by the Site Representative with all levels of cognizant project DOE, DOE Contractor and Subcontractor personnel may be accomplished in groups or one-on-one at the discretion of the respective project site representative, consistent with the availability of personnel. Such personnel interaction, visiting of spaces, and facility review of records, etc. shall be accomplished only with the objective of fulfilling onsite licensing representative duties and actions which follow:

## **REGULAR DUTIES**

Represents the Director of the Division of Waste Management at the site for all high-level waste repository site activities relating to the most difficult projects for the potential disposal of large quantities of highly radioactive waste at the site.

Proposes research programs, studies, safety reviews, and environmental impact assessments related to the future high-level waste repository licensing review.

Acts as on-site liaison between the NRC and DOE Project Manager related to the HLW repository licensing review.

Assists in the development of regulatory waste management policies, recommending improvements in procedures designed to accelerate the licensing process.

Develops and participates in liaison mechanisms with other agencies in waste management activities, including EPA, DOE, state and local government specifically to maintain cognizance of on-going research and to assure the adequacy and appropriateness of program direction.

Maintains awareness and proficiency in current and developing techniques and theories of systems analysis by frequent contact with researchers in the field through site visits and professional meetings.

Develops methods for the analysis and evaluation of license applications with respect to waste management activities, through review of present regulatory procedures.

Arranges meetings with senior DOE Field Office (FO) executives to discuss areas of mutual interest that may need clarification by the Division Director WM.

Recommends to the Division Director WM improvements to NRC/DOE interaction relating to site characterization.

Provides quality assurance (QA) reviews, as deemed necessary, in all areas of the DOE site characterization program to understand DOE's on going QA program and provide comments and recommendations to the Director WM as appropriate.

Expedites the flow of facts, information and plans regarding site characterization activities between DOE's Field Office and/or contractors and the Division of Waste Management.

As the representative judges to be appropriate or at the specific request of the Director, observes, reviews and evaluates onsite actions undertaken or sponsored by the DOE related to site characterization.

Arranges and/or coordinates site visits by NRC technical staff.

Prepares policy analysis papers and technical reports pertaining to the waste management program for use by the Division Director in developing waste management policy. As the representative judges to be appropriate or at the specific request of the Director, reviews documents related to the characterization of the candidate repository site, including environmental assessments and site characterization plans.

Independent Action

Independently assesses effectiveness of DOE's on-site activities and based on his judgments, brings issues or potential issues which may affect NRC's licensing actions to the attention of the NRC Division Director and appropriate NRC Branch Chief.

Independently assesses the effectiveness of NRC regulations and guidance on DOE's site characterization activities and, based on his judgment, brings issues or potential issues involving NRC regulatory actions and guidance to the NRC Division Director and appropriate NRC Branch Chief.

Represents Division Director in meetings with DOE, State or Tribal officials relating to site project activities. Based on knowledge of Division technical, and regulatory policy positions, uses judgement to articulate NRC positions and provide clarification.

Identifies, defines, and recommends to NRC Headquarters studies in support of the waste management effort. Monitors the activities of special study groups, task forces, and contractor studies directed at obtaining data and developing licensing procedures and standards for repository licensing activities and directs the use of information gained from studies in his onsite review activities.

Explores need for and establishes working liaison with multiple Federal agencies and acts as a liaison with other agencies involved in waste management activities including EPA, DOE, state and local government, especially as they deal with the Federal repository.

Makes specific recommendations concerning site characterization plans and activities to Division Director and/or NRC technical and project management staff.

Develops recommendations for the Division Director concerning NRC policy and technical positions on repository licensing issues.

Identifies and communicates pertinent information/data related to site characterization to responsible NRC technical and project management staff.