



WM Record File 101 WM Project 10
 Docket No. _____
 UNIFIED STATES
 NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D. C. 20555

WM-10
 PDR
 LPDR

Distribution: _____

 January 26, 1984

~~Return to WM, 623-SS) back to KEB 4/84~~

MEMORANDUM FOR: Robert E. Browning, Director Waste Management

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

SUBJECT: BWIP SITE REPORT FOR WEEK OF JANUARY 15, 1984

1. During this week I reviewed a copy of Volume I of DOE's mission plan per WM Staff request. Comments were provided verbally to J. Jiarratana. These comments are contained in the attachment to this memorandum.
2. Also during the week I reviewed a copy of the Staff review plan for future Environmental Assessments. These comments were forwarded separately to Hubert Miller.
3. Two significant observations and comments coming from these reviews follow:
 - a. In the mission plan DOE does not evaluate financial, political, legal or institutional problems consistently nor in any summary fashion. Institutional characteristics within DOE involving their chains of command (which may or may not be addressed in study of alternate means of financing per Section 303 of the NWP) will present a problem in effecting consistent management of repository activities and will provide problems for the Staff in accomplishing site characterization reviews. One key area is the management of quality assurance activities. Another is the inconsistent approach to accomplishing performance assessments in the salt, tuff and basalt projects. The Staff should identify problems per item 3 of Section 301, and provide these in our comments back to them.
 - b. Concerning EA content and Staff reviews of EA's, I would recommend that all environmental matters which NRC considers pertinent for evaluation in a later EIS (see 10CFR51.20) should be addressed in the EA's to the extent possible given available information. This will provide for early public input on such matters and their assessment during site characterization, although such information is not mandatory for the EA's per the NWP. It will further potentially eliminate the need for a separate environmental report per 10CFR51.40(d) if pertinent environmental matters are addressed in other DOE documents.
4. Concerning review of BWIP QA for testing, I have arranged for January 30 and 31 to review various waste package test activities and geochemistry testing. DOE (QA and BWIP) personnel are accompanying me. They (DOE) have not reviewed these activities and are encouraging the review. I will look at RHO, Westinghouse and PNL testing. I plan to focus on whether required QA system test documentation is in existence and if so whether or not other required details are in order.

Attachment: Attachment A

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

cf: w/attachment
 HJMiller ETTana
 JTGreeves RJWright
 JOBunting PSJustus
 MK... FRCook

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Attachment A.

1. Use of the term backfill in the description of the waste package (page 3-A-2) is inconsistent with usage in 10CFR60. Backfill is part of the engineered barrier system but not part of the waste package per 10CFR60.
2. The description of waste package leaves out the key technical functional requirement of containment. (page 3-A-2)
3. We should say that the policy on 3-A-5 to emphasize the natural system is not a requirement of IIRC. This is a change from DOE's earlier position to treat the site and the engineered components as a system.
4. Waste package and repository descriptive text (3-A-19&20) does not reflect systems integration discussed on p 2-15. This appears to be a major comment for the whole mission plan, ie, the systems integration work is not reflected in stated schedules. For example, handling, interim storage and transportation issues are not reflected in the discussion on page 3-A-19.
5. The last sentence on page 3-A-20 is wrong--work has not concentrated on generic design concepts--concepts have been site specific for the most part and do not reflect transportation, interim storage and handling issues.
6. Page 3-A-25 discussion regarding TEF is vague--what is meant by repository site designation? Also a TEF at a site, per Sec 305 of the NWPA, must not be initiated until a construction authorization is issued. The term "designation" is not a meaningful term to use in this discussion of TEF's.

7. The discussion of "in-situ testing" on page 3-A-25 is out of context. In-situ testing goes on for a long time after construction and during operation. Also final waste package designs should be presented with the construction authorization, otherwise the Staff will not be able to review the system relative to performance objectives and design requirements.
8. The plan for in-situ testing is inconsistent with 10CFR60 requirements. For example, Section 2, page 3-A-26, concerning timing for various activities, is inconsistent with procedural requirements in 10CFR60 and the NHPA, Section 305(b).
9. Regarding the discussion on page 3-A-41, per Section 114 of NHPA, DOE must have completed site characterization for 3 sites, hence paragraph (1) page 3-A-4, suggesting incomplete site characterization is okay, is wrong. It would appear DOE should have 3 acceptable sites and recommend one to the President for construction. This is consistent with 10CFR50.40(d).
10. There is no indication of planning to get a MRS licensed by NRC. This should be added to the planning in the mission plan, not left to a plan for licensing (see 3-B-11, 2nd to last paragraph 6).
11. Interim storage planning and concepts should be linked with and compatible with repository disposal plans.
12. Per figure III-B-3, 2 1/2 years seems a long time to take for NRC to license a MRS, particularly if prelicensing consultation with NRC has occurred in a way similar to that planned for repository licensing. The repository license construction authorization will be substantially harder to evaluate, yet it appears only 3 years are allocated.



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*Juan -
File
Bunting
Miller
follow-up*

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M

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F. Robert Cook

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 Senior On-Site Licensing Representative

cf: w/attachment
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 MRKnapp FRCook

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