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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 WEEK OF NOVEMBER 28, 1983

Time was spent preparing for and attending the In-Situ/Exploratory Shaft Test Plan Workshop among NRC, DOE and RHO representatives at Richland. The following are considered major observations stemming from this workshop:

1. Analytical bases for in-situ testing, described in a draft RHO plan presented at the workshop, do not exist in formal documents. RHO is in the process of preparing documentation to link testing to analyses planned for repository system performance assessment.
2. In-situ plans do not cover testing to validate models for containment and controlled release or for predicting repository conditions pertinent to engineered system performance assessments, except for some testing in the area of rock mechanics. As noted by the staff in the meeting report, this area of performance confirmation testing needs to be addressed in a separate workshop. This area of testing would appear to have a major influence on the scope of the in-situ test facility and would appear appropriate for integration into RHO's final test plan. Currently RHO actions are not directed at accomplishing this integration. This area of testing remains to be coordinated by DOE Headquarters.

I consider it is as important to resolve this area of in-situ testing as the thermal-mechanical-hydraulic coupling issue we have highlighted in the past. (10 CFR 60.140 (a), (b) and (c) provides requirements for testing in this area).

3. RHO noted that their schedule for in-situ testing does not provide contingency time for investigating unforeseen events and phenomena even though it was agreed such events and phenomena would likely be encountered. This observation was initially included in draft staff observations but was later deleted based on the conclusion that the scheduling of testing was outside the cognizance of the staff and remained a DOE prerogative. If such scheduling can effect the quality of data collected during in-situ investigations, then it would come within the cognizance of NRC. I am concerned that keeping to national program schedules may in the future be an overbearing influence on the activities of investigators and should be evaluated by the staff in this light to assure objective investigations are being planned.

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