

WM Record File

WM Project 11

Docket No. _____

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MEMORANDUM FOR: Avi Bender
 DWM Pilot Project Issue
 Identification Task Group

THRU: John T. Greeves, Chief
 Engineering Branch, DWM

FROM: Mysore Nataraja, Section Leader
 Rock Mechanics Section
 Engineering Branch, DWM

SUBJECT: COMMENTS ON NNWSI HLW OPEN ITEMS GUIDANCE

The Engineering Branch has reviewed the document entitled "NNWSI HLW Open Items Guidance." The following are our comments on that report:

1. It is not clear what is meant by "non-overlapping" in the section on open items as found on page 2 of the "Guidance for Completing Open Items Form." There should be clear recognition in the guidance document that many open items will overlap between disciplines. How these cases will be handled should be discussed in the guidance document. For example, in the open item for Geology/Geophysics entitled "the possible consequences of fault rupture....," will have an impact on the waste package design and the underground facility design. However, there is no recognition on the form that this is a multidisciplinary problem. This problem would definitely have an impact on the contents and usefulness of the open items report.
2. It is stated in the section on Initial Identification on page 2 of the "Guidance for Completing Open Items Form" that if an open item can not be referenced to a source document or meeting it should be stated as "non-documented" or an open item which has not been brought to DOE's attention. It is also stated in the section entitled "open item," that an open item is a major technical, policy or institutional licensing concern. Therefore, if an item is important enough to track in the open items system, then it should not be acceptable to allow an item to be entered into the system until it has been brought to DOE's attention.
3. "Guidance for Completing Open Items Form" page 2, Open Items. This section includes details such as "the importance or relevance to the licensing process should be explained..." However, since this

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section is supposed to be only one line in the open items report, it is not appropriate to discuss or require that type of information in this section. We suggest that points such as the one mentioned above, be added to the section entitled "background" and also be added to the "interim guidelines summary."

- 4. "Interim Guidelines Summary." The discussion in the guidance for completing for the open items form is not consistent with the interim guidelines summary. The report should discuss in more detail, not less than, what is required on the guidelines summary. We recommend that the discussion in the document entitled "guidance for completing the open items form" be expanded to discuss all the required items that were included in the interim guidelines summary.
- 5. The review and concurrence process for entering an open item into the system form should be discussed in the guidance document.
- 6. The frequency needed for updating the open items system should be discussed in the guidance document.

It appears that the preparation of open items reports with appropriate changes in the guidance document as stated in this letter can be useful as a summary of open items on high level waste programs. We believe that the open items forms will be useful to management and the public which will have available to them a short summary of what NRC considers to be their major technical, policy or licensing concerns. However, it does appear that it will require a fairly large staff effort to complete the initial identification of open items. The impact on time requirements will be even greater if each report must be reviewed and approved (not discussed in document) and constantly updated (also not discussed in document).

It will be desirable that the Issue Identification Task Group make concerted effort to demonstrate the benefits of this effort to the technical staff. We believe that only by working closely with the technical staff and by using a streamlined implementation process, the proposed system for tracking and resolving potential licensing issues can be made to work effectively.

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We will be happy to discuss with you our comments on the open items guidance at a mutually agreeable time. If you have any questions please contact Mr. David Tiktinsky (x74649) of my staff.

Sincerely,

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Mysore Nataraja, Section Leader
Rock Mechanics Section
Engineering Branch, DWM

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FROM Avl Bender		DATE OF DOCUMENT 3/7/86	DATE RECEIVED 3/13/86	NO. WM-86213
TO JGreeves		LTR	MEMO XX	REPORT XX
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REG. NO.				
DESCRIPTION (Must Be Unclassified) Submission of NNWSI HLW Open Items (Issues) for Review & Comment		REFERRER TO JGreeves	DATE 3/13	RECEIVED BY
ENCLOSURES <i>Action closed 3/28</i> <i>Memo to Bender</i>		MNataraja		
REMARKS				