

NOTE TO: B. J. Youngblood, Chief
THRU: J. Linehan, Section Leader
FROM: J. Holonich, Senior Project Manager
SUBJECT: USE OF ESTABLISHED REGULATORY GUIDES FOR YUCCA MOUNTAIN

APR 11 1988

On April 4, 1988, you met with myself, Seth Coplan, and Bob Neel to discuss the possibility of using established Regulatory Guides (Reg Guides) in the staff review of the high-level waste repository. The subject discussed at the meeting was the possibility of reviewing Reg Guides to determine what Guides were applicable to pre-closure activities at Yucca Mountain. If it were determined that the positions established in Reg Guides could be applied, the staff would use these positions instead of developing new ones.

You agreed that this would be prudent and could help conserve Division resources. The approach to determining what Reg Guides would apply would be to request that the Office of Nuclear Regulatory Research review all of the Guides and provide a list of possible candidates. This preliminary list would then be reviewed by the Technical Review Branch to determine what Regulatory Positions in the Guides could be used. Once a final list of Reg Guides and Regulatory Positions were determined, you suggested that the Division of High-Level Waste Management publish its own Reg Guide that contained the staff positions for Yucca Mountain.

Because of the amount of staff resources needed to publish a new Reg Guide that contains individual positions, it may be more efficient to publish a Guide that contains a listing of the applicable sections. This approach was used by the Fuel Cycles Safety Branch (FCSB) and was also discussed at our meeting. The Reg Guide published by FCSB dealt with the design and operation of independent spent fuel storage installations. In its Guide, FCSB listed the affected area, the applicable Reg Guide, the appropriate Regulatory Position and those portions of 10 CFR that were addressed by the individual Guides. Although you preferred the former approach, I am suggesting that you consider the FCSB method because of the resource savings. A copy of the FCSB Reg Guide is attached for you information.

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J. Holonich, Senior Project Manager

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