



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

MAY 12 1982

*Stearns*

Let's prepare a  
response to this.

*WMP*

*File*

WMHT: 3109

Dr. Franklin E. Coffman  
Deputy Assistant Secretary  
for Nuclear Waste Management  
and Fuel Cycle Programs  
U.S. Department of Energy  
Washington, DC 20545

Dear Dr. Coffman:

This is in response to the letter from Wade Ballard dated March 22, 1982 requesting estimates of licensing schedules for the first repository. Attached is our current best estimate of the times it will take to conduct each of the steps in the review of the construction authorization application and associated hearings. This is essentially the schedule that was reviewed in a meeting between our staffs on April 19, 1982.

The total estimated time for licensing is three and one-half years. If legislation pending in the Congress (S.1662) passes with the provisions for NRC use, to the extent possible, of DOE NEPA assessments (Section 405(f)(3)) and the DOE does a good job in these assessments, we will be able to reduce this time. We can substantially eliminate the activities shown in the attached sheet under environmental review. With this and the ability to direct freed resources to the safety review, we estimate we may be able to reduce the time of licensing somewhat.

There are several very important assumptions supporting these estimates. First, a high quality and complete license application is assumed. The schedules are based on DOE having completed all of the technical work and testing needed to make the findings required in 10 CFR 60.31. However, as I indicated in my recent letter of April 15, 1982, we are concerned about whether your current plans for underground testing and site characterization will be adequate to result in a complete application.

The second assumption is that there will be a free and open exchange between the DOE and NRC to establish what information will be needed for the license application and that the NRC will be kept abreast of information and data as it is developed at sites being characterized. This is the kind of consultation called for by S.1662 (Section 404 (c)). In light of recent difficulties in scheduling discussions at the BWIP

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*Ballard*

Franklin E. Coffman

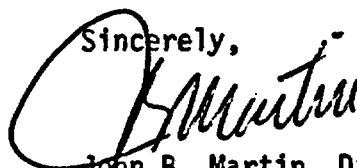
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project, we are not confident on this point. For example, since the end of January, we have attempted to followup, within constraints posed by your program responsibilities, on a BWIP project proposal for a series of meetings and workshops on selected, important site issues. Despite many meetings and discussions with DOE headquarters, no progress was made until our meeting on April 27, 1982 when we were given for the first time, a proposed agenda for a meeting during the last week of May. Since then, even these plans have been put off. Because starting such interactions soon is so important to schedule, I think it is essential that we both give this matter our personal support and attention.

Any use of this schedule by the DOE in its planning must include statement of the above assumptions. Until such time as our concerns are resolved, we are not sanguine about the prospects for the sort of orderly licensing proceedings that are depicted in the attached schedules.

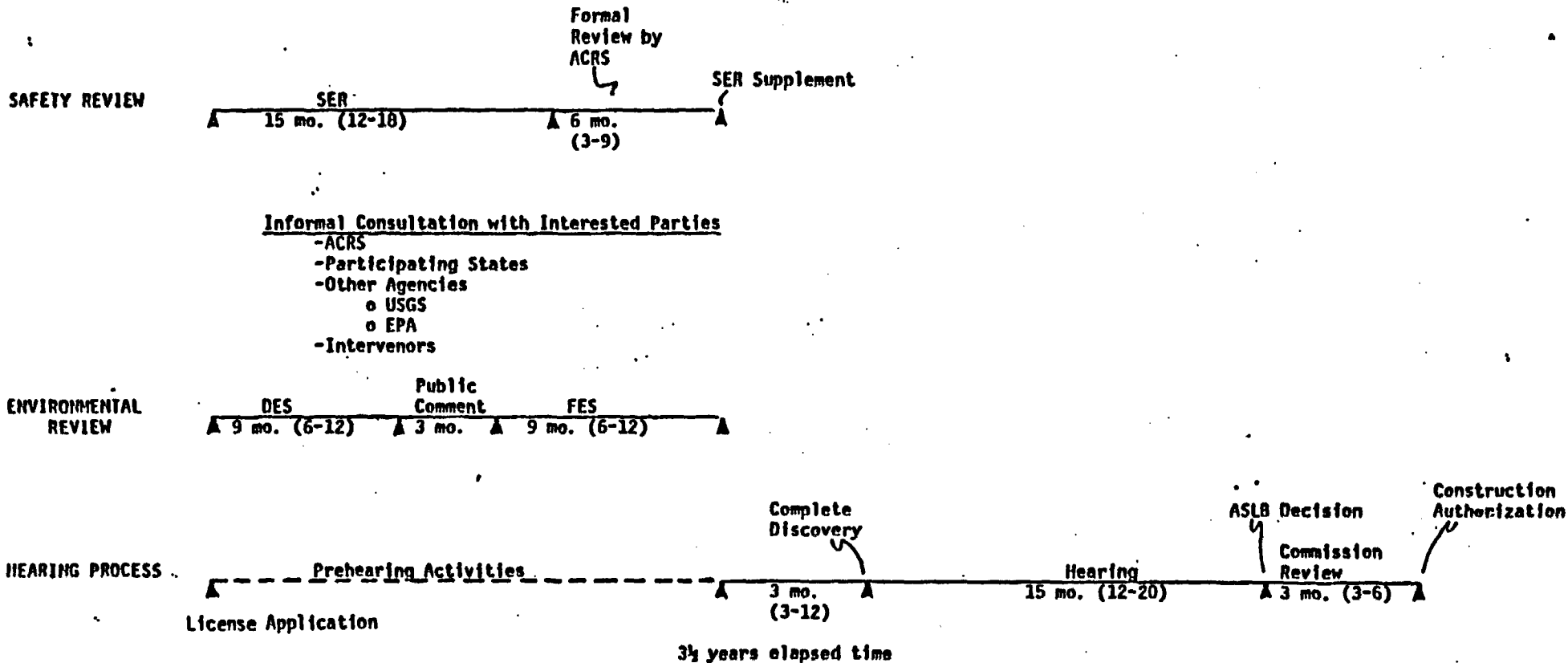
Sincerely,



John B. Martin, Director  
Division of Waste Management

Enclosure

SCHEDULE ESTIMATES FOR HLW REPOSITORY LICENSING



**FOOTNOTES**

1. A high quality and complete license application is assumed. All technical work and testing needed to make the finding required in 10 CFR 60.31 are assumed complete.
2. A free and open exchange between the DOE and NRC to establish what information will be needed for the license application and that the NRC will be kept abreast of information and data as it is developed at sites being characterized is assumed.
3. Uncertainties in times are shown in parentheses. Greatest uncertainties are associated with the hearing process.