



Department of Energy
Washington, DC 20585

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R. Carlson
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USNRC
OFFICE OF ADMINISTRATION
6/17/93

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David L. Meyer
Chief, Regulatory Publications Branch
Division of Freedom of Information and
Publication Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Dear Mr. Meyer:

This letter transmits comments from a U.S. Department of Energy (DOE) review by the Office of Civilian Radioactive Waste Management (OCRWM) of the U.S. Nuclear Regulatory Commission's (NRC) draft Staff Technical Position (STP) on Consideration of Fault Displacement Hazards in Geologic Repository Design.

General Comments

The STP accurately documents past DOE/NRC interactions which have reached a common understanding of the NRC position. DOE concurs with the general nature of the STP and believes that; 1) it provides sufficient guidance to DOE with one exception at this time, and 2) the on-going scientific investigations will provide the information needed to determine specific solutions that meet this guidance.

DOE agrees with the NRC staff position that the presence of a Type I fault does not, by itself, represent a disqualifying feature for a candidate repository site. This does not prohibit designing the geologic repository against the effects of such a potentially adverse condition.

DOE is planning a topical report that will discuss both deterministic and probabilistic approaches to determining fault displacement hazards in geologic repository design.

SPECIFIC COMMENTS:

- Section 1.1 - The wording of the first sentence implies that fault displacement is separate and distinct from seismic hazards. Suggest revising the wording to "...there is uncertainty associated with the design and evaluation of nuclear facilities for seismic hazards, and specifically for fault displacement hazards."

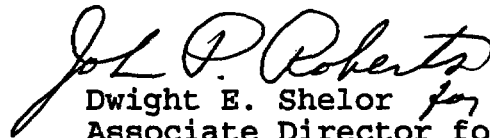
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- Section 1.1 - The wording of the second sentence is confusing. It is not clear what parameters are being referred to, and the use of "accurate" and "accurately" is redundant. If it is appropriate to your intent, DOE suggests rewording to say, "Inadequate or inconclusive geologic evidence has made it difficult to accurately establish parameters for specific locations or the design basis for individual facilities." In addition, the parameters should be specified.

Should you have any questions, please contact Chris Einberg of my office at (202) 586-8869.

Sincerely,



Dwight E. Shelor
Associate Director for
Systems and Compliance
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