



Department of Energy

Washington, DC 20585

DEC 1 1988

John Linehan, Chief
Project Management and Quality
Assurance Branch
Division of High Level
Waste Management
Office of Nuclear Materials
Safety and Safeguards
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Linehan:

The Department of Energy (DOE) has given careful consideration to your letter of August 5, 1988, concerning the two study plans (8.3.1.2.2.2 - Water Movement Test, and 8.3.1.15.1.5 - Excavation Investigation) submitted to the Nuclear Regulatory Commission (NRC) on May 27, 1988.

Your letter states that NRC staff's Acceptance Review found the study plans to be incomplete, and that you have therefore postponed the technical review. NRC technical concerns center on absence of, or insufficient detail in the descriptions of interference between tests, applications of data, interrelationships and schedules of studies.

Based on the May 7-8, 1986, agreement it is DOE's perception that the study plans are supplemental supporting documents to the SCP and were never intended to serve as independent documents. Chapter 8 of the SCP contains the description of the performance allocation process which resulted in the testing strategies reflected in the study plans, discusses where the information will be used, and how the studies are related. Section 8.3 of the SCP describes the investigations, the rationales, applications of data and interrelationships of investigations and studies. Section 8.4, which has been substantially revised for the statutory SCP, will discuss data needs, test-to-test interference, the representativeness of test methods, and potential impacts of tests on waste isolation. In addition, the logic diagrams and tables in Chapter 8 provide the links between studies in terms of data feeds and timing. Study plans reference this information and contain specific information required by the agreement, but generally do not repeat the SCP text.

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As a result of the NRC comments, the DOE has reviewed the study plans and believe that some modification is necessary. Additional details that are absent will be provided and more specific references to relevant parts of the SCP and technical procedures will be included. These modifications should resolve most of the NRC concerns by providing additional clarification on several topics. We therefore plan to revise the study plans and resubmit them during the same timeframe as issuance of the statutory version of the Yucca Mountain SCP.

Questions relating to this correspondence should be directed to myself or Gordon Appel of my staff at 586-1462.


Ralph Stein
Associate Director for Systems
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