



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

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SEP 14 1989

NOTE TO: Robert E. Browning, Director  
Division of High-Level Waste Management

THRU: John J. Linehan, Director  
Repository Licensing and Quality Assurance Project Directorate  
Division of High-Level Waste Management *JJ*

FROM: James E. Kennedy, Section Leader  
Quality Assurance Section  
Division of High-Level Waste Management

SUBJECT: NUREG 1297 APPLICABILITY TO SZYMANSKI REPORT

The NRC's generic technical position "Peer Review for High Level Nuclear Waste Repository", NUREG-1297, establishes criteria for a review to support material used as the basis for licensing. It was not developed to address the evaluation of alternate concepts or interpretations proposed, or in contrast or opposition to those which the DOE selects as its basis for licensing. The NUREG-1297 process is rigorous and resource-intensive, and is not appropriate for evaluating the validity of the alternatives to DOE's licensing basis proposed by various parties.

The peer review which DOE performed of the Szymanski Report was an "internal" or "on-project" peer review. It does not meet the review criteria established in NUREG-1297, particularly in the area of independence of the reviewers. The off-project peer review which DOE is proposing may meet these criteria, but we have insufficient information to make that determination. The procedure which DOE is referencing as the basis for the peer reviews, QMP-03-01, Rev. 1, does not appear to be totally in accord with NUREG-1297, particularly in the area of independence of the reviewers.

James E. Kennedy, Section Leader  
Quality Assurance Section  
Division of High-Level Waste Management

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James E. Kennedy, Section Leader  
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