

January 18, 1989

Note to: P. Justus  
From: R. B. Neel *RBN*  
Subject: Comments on Draft Technical Position on  
Retrieval Demonstration

GENERAL

The draft should clearly state in the introduction if it is generic or if it is applicable only to Yucca Mountain. Any condensation of the text would enhance readability significantly.

SPECIFIC

A number of typos and minor comments are indicated in the text with red pencil. The most substantive of these comments are listed below.

<u>PAGE</u>	<u>SECTION</u>	<u>COMMENT</u>
5	2.1.1	Add the following subsection to follow (2) in order to pave the way for the design basis accident rulemaking which will include a guidance on dose of 5 rem:  "(3) designing the GROA to any general subsurface performance objectives promulgated by the Commission" [60.21 (c) (2)].
6	2.1.2	Should a sentence be added to the second-to-last paragraph to indicate that <u>all</u> of 60.131 applies to retrieval?
7	2.2	Change Appendix A to Appendix B in the last sentence.
9 13	3.4/3.5 4.1.4	Several phrases/words need to be defined in the Glossary: off-normal; proof of principle (concepts); multiple-excavations.
10	4.1	I suggest that subsections 4.1.1, 4.1.2 and 4.1.5 be incorporated into other parts of the document in order to maintain the parallelism of structure between each subsection in the technical position, section 3, and its corresponding text in the rationale, section 4.
15	4.1.6	Include this section as a continuation of 4.1.3 since it refers primarily to timing (periods, contemporaneous with repository construction, etc.).
16	4.2	Perhaps this section should address the need for a performance assessment (requirements are described in the draft Standard Format and Content outline given to Joe Holinich).

- 22 4.1.4 In the first sentence, should section 3.4 be changed to section 2.0?
- 24 4.4.1 The phrase "unanticipated processes and events" should be struck. It does not apply to preclosure phase. (See also this usage on page 26, section 4.4.2).
- 29 4.4.4 The training area should demonstrate the radiological safety procedures to be used in retrieval.

*H. B. Keel*