

COMMENTS/SURFACE/REPOSITORY

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NOV 22 1988

MEMORANDUM FOR: Robert E. Browning, Director
Division of High-Level Waste Management
Office of Nuclear Materials Safety and Safeguards

FROM: Joseph O. Bunting, Chief
Engineering Branch
Division of High-Level Waste Management

SUBJECT: COMMENTS OF PROJECTED SCOPE FOR THE TECHNICAL POSITION ON
APPLICATION OF EXISTING REGULATORY GUIDES TO SURFACE DESIGN
OF THE REPOSITORY

Upon review of the Projected Scope for the Technical Position on Application of Existing Regulatory Guides to Surface Design of the Repository, the engineering staff has the following comments.

1. It would be more beneficial to develop a TP on underground repository facilities before development of a TP on surface facilities. This plan will better serve DOE since there is a greater need for guidance on the design and construction of the underground facilities than on the surface waste facilities.

2. It is stated in Section 2.0 that the "Introduction" of the TP will contain a discussion of why the staff has chosen to endorse the positions taken in the existing Regulatory Guides. The engineering staff has the following concerns with this approach. First, positions taken in HLWM TP's should stand on their own technical merits and be put forth as independent positions. If the positions are technically defensible they will again withstand public scrutiny. Second, a description of how the staff adopted the positions taken in NRR Reg. Guides does not seem warranted.

3. It does not seem appropriate for the staff to document why certain positions taken in NRR Reg. Guides are not appropriate in a HLW TP on surface facilities. As stated above, the engineering staff believes it would be more appropriate to make the HLWM TP's independent from the NRR Reg. Guides.

4. In Section 3.0 it states that, "this TP simply takes already established guidance and endorses its use in the HLW program". TP's on surface and underground facilities may be incomplete, if only existing NRR guidance is considered in their development. The engineering staff believes that barring additional positions from the TP's may severely reduce their usefulness.

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5. The staff does not believe that using previously issued NRR positions in HLWM TP's is necessarily an advantage. Even though these positions have been used by the nuclear industry, subjected to the hearing process and reviewed by the public, it was in a different context. In the context of HLWM, each position will again be analyzed in detail.

In general, the staff would make the following recommendations:

1. Develop the underground facility TP before developing the surface facility TP.
2. Develop the TP's as independent HLW positions using NRR and other NRC Reg. Guides appropriately but not exclusively.
3. The scope developed by RLPD be revisited by the responsible engineering staff and an acceptable schedule be developed after appropriate coordination among the staff.

~~Original Signed By~~

R. Weller for

Joseph O. Bunting, Chief
Engineering Branch
Division of High-Level Waste Management

cc: Mysore Nataraja
Brian Thomas

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