



Department of Energy

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NOV 18 1983

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ANNOTATED TABLE OF CONTENTS - NOVEMBER 14, 1983

In order to make a serious attempt to furnish draft EA chapters to DOE/HQ by the December 15, 1983 and January 3, 1984 deadlines, The NNWSI Project must finalize its internal program guidance. Accordingly, we have prepared Enclosures 1, 2, and 3 to provide detail to our staff for preparation of the subsections of Chapter 4. The basis for preparation of these attachments was the following:

1. Draft annotated table of contents dated November 10, 1983.
2. Performance assessment meeting held in Chicago on November 14, 1983.

The enclosures to this letter are consistent with the presentations and discussions at that meeting. The enclosures and an NNWSI revised annotated table of contents (November 16, 1983) have been distributed to the NNWSI Project members for preparing their inputs to the NNWSI EA.

We will be unable to accommodate further change in: (1) the annotated table of contents or (2) the approach to performance assessment in the EA if we are to meet the December 15, 1983 and January 3, 1984 deadlines you have imposed.

In order to implement the annotated table of contents (HQ 11-14-83 version), there are several items which have required revision. Please inform us immediately if you disagree with these NNWSI revisions (shown in Enclosure 4).

Donald L. Vieth
 Donald L. Vieth, Director
 Waste Management Project Office

WMPO:MBB-229

Enclosures:

1. Format for 4.2.2, 4.3.4, and 4.3.2
2. Format for 4.4
3. Format technical guidelines in 960.4.2 and 960.5.2
4. NNWSI changes to the HQ annotated table of contents (11/10/83 version)

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ENCLOSURE 1

PROPOSED FORMAT FOR ADDRESSING PRECLOSURE SYSTEM GUIDELINES
CHAPTER: 4.2.2 AND 4.3.4

- I. Description of How Section is Organized
- II. Statement of Qualifying Condition
- III. Rationale
 - A) Data Base (e.g., Analogous Existing Facilities, GEIS, etc.)
 - B) Assumptions (Repository will have similar or less impact)
 - C) Site Specific Analyses (where appropriate, including "Roll up" of applicable Technical Guidelines)
- IV. NNWSI Position

PROPOSED FORMAT FOR ADDRESSING POSTCLOSURE SYSTEM GUIDELINE
CHAPTER 4.3.2

- I. Description of How this Section is Organized
- II. Statement of Qualifying Condition
- III. Evaluation Procedure
 - A) Evaluation of the Site with Respect to the Technical Guidelines appropriate to the System Guidelines
 - B) Results of Preliminary Performance Assessment (summary from Chapter 4.4)
- IV. NNWSI Position

ENCLOSURE 2

4.4 Analyses Supporting Evaluations Against System Guidelines

Overview paragraph to contain scope and purpose statement.

4.4.1 Preclosure Supporting Evaluations

- Same as Postclosure

4.4.2 Postclosure Supporting Evaluations

A. Preliminary System Performance Assessment Process

The components of the PA will be summarized here and detailed in a PA appendix.

1. Conceptual model: basis, adequacy, uncertainty, and expected conditions
2. Methods and codes used, their linkage, assumptions and their documentation (by reference or appendix).
3. Repository inventory (common)* system components, identify disturbed zone and engineered barriers
4. Data required and adequacy of available data (confidence, uncertainty)(i.e., identify needs of models and data availability)
5. Data estimates for natural systems and components (deterministic, but emphasize uncertainty).

B. Preliminary System Performance Assessment Results (Results and Uncertainties)

1. Show and interpret results for base case analysis of release to accessible environment; compare to both draft versions of EPA Table 2
2. Discussion of most important parameters and the effects of variability and uncertainty

* 70,000 MTU capacity, 50/50 mix spent fuel, fuel age 10 years out of reactor, burn-up 33,000 Mwd/MTU.

ENCLOSURE 3

FORMAT FOR PRESENTING THE EVALUATION OF THE SITE WITH RESPECT
TO THE TECHNICAL GUIDELINES (960.4.2 AND 960.5.2)

- I. A description of how section is organized
- II. Statement of qualifying condition
- III. Evaluation process
 - A. Listing of relevant data (references, their topics, and types of additional new data contained in the following discussions of favorable, potentially adverse and qualifying conditions)
 - B. Assumptions and uncertainty (general statement of adequacy of data to support positions)
 - C. Analysis (types of analyses contained in the following discussions of favorable, potentially adverse, and qualifying conditions)
- IV. Favorable conditions
 - A. Position statement for each favorable condition
 - B. Brief statement of rationale (refer to position statement)
 1. Critical data (cross reference other favorable and potentially adverse conditions)
 2. Analysis (if appropriate)
 3. Assumptions and uncertainty
- V. Potentially adverse conditions
 - A. Position statement for each potentially adverse condition
 - B. Statement of rationale
 1. Critical data (cross reference other favorable and potentially adverse conditions)
 2. Analysis (if appropriate)
 3. Assumptions and uncertainty
- VI. Disqualifying condition
 - A. Position Statement
 - B. Rationale (Reference Chapter 2)
- VII. Conclusion on qualifying condition
 - A. Statement of position
 - B. Basis for conclusion given the evaluation at favorable and *POTENTIALLY ADVERSE conditions INDIVIDUAL and/or collectively*

ENCLOSURE 4

NNWSI REVISION TO THE HEADQUARTERS ANNOTATED TABLE OF CONTENTS

NOVEMBER 10, 1983 VERSION

1. The page limits proposed for the individual chapters have been ignored. Specifically, the 40 to 50 page limit specified for Chapter 4 will virtually be utilized in simply reiterating the siting guidelines. Instead, the guidance given to the NNWSI Project members is to prepare the chapters to be as concise as possible so that each contains adequate data and analysis to demonstrate compliance with the siting guidelines and the Headquarters guidance for the annotated table of contents. Once we have a full understanding of the amount of information required to demonstrate compliance, then we can summarize the lengthy portions to retain the essence of compliance and relocate the details in appendices. We plan this activity to occur between the December 15, 1983 initial draft and February 15, 1984 version.
2. Page 3, Section 3.1, line 4: change "should be commensurate" to "should be adequate for the reader to understand the evaluation presented in the Chapter 4 comparisons of the site with the siting guidelines, and commensurate."
3. Section 3.1.2: add "The content of this section should be consistent with the siting guidelines. It should contain: stratigraphy, structure, geochemistry, erosion, tectonics, geomorphology, mineral resources, seismicity, volcanism, geologic history, lithology and petrology."
4. Section 3.1.3: add "The content of this section should be consistent with the siting guidelines. It should contain: recharge, discharge, paleoclimate flooding, runoff conditions, regional aquifers, water quality and water use." Delete 3.3.1.1. Surface Water and 3.3.1.2 Ground Water.
5. Section 3.1.5: Add, transportation is to address the existing network.
6. Page 4, Section 3.2, line 1: change "brief ... itself," to "brief physical description, as well as a conceptual description of the repository operation, aimed..."
7. Section 4.2, paragraph 2: add "Reference should be made to Chapter 2 for evaluation of disqualifying condition," to the last line. For topic sentence in front of 4.2.1, delete the work "may."
8. Page 5, Section 4.3, paragraph 2, line 3: delete "both", delete "and the disqualifying", line 5: change "may" to "should", final sentence should read: "Evaluation against system guidelines cannot be supported by comprehensive system assessments in the pre-characterization phases; they will be supported by a simplified performance assessment, based upon available data that evaluates the site's performance from a system analysis of the technical guidelines."
9. Page 6, line 2: delete "may."

United States Government

Department of Energy

memorandum

DATE: NOV 11 1983

REPLY TO
ATTN OF: RW-25

SUBJECT: Revision of Annotated Table of Contents (ATC) and Response to Project Input

TO: Distribution

During the past week, we have received from the projects several very good comments requesting clarification and additional information on various points in the annotated table of contents (ATC) for the environmental assessments (EAs). The purpose of this transmittal is to respond to the concerns you have raised.

We recognize that the version of the ATC that you received last week reflected agreements reached at the October 28, 1983, workgroup meeting. We have been careful not to make any major modifications to the ATC that fall outside of the bounds of agreements reached at the workgroup meeting. The revisions contained in the attached version of the ATC provide additional guidance that you have requested. Revisions have been made in eight areas:

- 1) A foreword has been added to discuss the requirement to prepare the EAs, the scope of the EAs, the basis for the EAs, and the public review and comment process.
- 2) An introduction has been added to Chapter 1 to present background information to orient the reader: areas to be discussed include radioactive-waste disposal in mined geologic repositories, the principal features of a repository, the Act and its requirements, and the guidelines.
- 3) The headings of Sections 4.2 and 4.3 have been revised from:

4.2 Suitability of Nominated Site for Development as a Repository

and

4.3 Suitability of Nominated Site for Site Characterization

to:

4.2 Suitability of the Site for Development as a Repository;
Evaluation Against the Guidelines That Do Not Require Site
Characterization

and

4.3 Suitability of the Site for Site Characterization: Evaluation Against the Guidelines That Do Require Site Characterization

- 4) A description of the repository at the site has been added as Section 3.2. It is felt that such a discussion is necessary to prepare the reader for the discussion in Chapter 4 of compliance with the system guidelines.
- 5) Land use is a major concern of many States. Therefore, land use has been identified as a separate item in Chapters 3, 5, and 6.
- 6) Added to Chapter 4 were the following:

4.3.4 Preclosure System Guidelines

4.3.4.1 Preclosure Ease and Cost of Construction, Operation, and Closure 960.5.1(a)(3)

- 7) The format of Chapters 5 and 6 has been revised slightly to incorporate three major headings within which the previously listed effects may be arranged. We believe that this will give the Projects greater flexibility in addressing this very important effects section. Also, added are sections on irretrievable and irreversible commitments of resources.
- 8) To provide guidance on the extent of discussion, numbers of pages for each chapter of the EA have been suggested.

Again, we do not believe that these revisions alter any major agreements previously reached, but rather provide additional guidance and direction. We would welcome your comments on these revisions. Comments may be directed to Carol Hanlon (301/963-5223) of my staff, Larry White (301/963-6820) of WESTON or Craig Toussaint (301/963-6822) of WESTON.


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ANNOTATED TABLE OF CONTENTS FOR NWPA SITE NOMINATION
ENVIRONMENTAL ASSESSMENTS (EAs)

Foreword

(Prepared by HQ)

A brief discussion of the purpose of the EA, the scope of the EA (including a reference to the public hearings held for that purpose), the basis for the EA (i.e., available data), and the public review and comment process.

Executive Summary

(Prepared by HQ; based on input from Projects)

Chapter 1 SUMMARY OF THE DECISION PROCESS LEADING TO SITE NOMINATION

(prepared by HQ; based on input from Projects)

1.1 Introduction

(Prepared by HQ)

The introduction will provide the reader with background information. It will briefly discuss radioactive-waste disposal in mined geologic repositories, the principal features of a repository, the Nuclear Waste Policy Act and its requirements, and the guidelines.

1.2 Summary of the Overall Decision Process

A summary of the overall decision process from screening to the selection of sites for nomination.

1.3 Identification of the Nine Potentially Acceptable Sites (PASs)

Summary description of how the nine PASs were identified. This historical overview section will discuss the process used to select the nine PASs (summary of Section 2.2 combined from all EAs).

1.4 Evaluation of PASs

Summary of evaluation of nine PASs against the disqualifying conditions (summary of Section 2.3 combined from all EAs). Results may be presented in matrix format.

1.5 Grouping of Sites by Geohydrologic Setting

Description of the basis for grouping by geohydrologic setting. This is an application of the guidelines requiring the DOE to consider a diversity of rock types and geohydrologic settings (siting guidelines 960.3.1.1 and 960.3.2.2).

References for Chapter 1

Chapter 2 DECISION PROCESS BY WHICH THE SITE PROPOSED FOR NOMINATION WAS IDENTIFIED

(Prepared by each Project)

Sections 2.1, 2.2, and 2.3 will be included in all EAs; Section 2.4 will be included in salt-site EAs only. The suggested length for this chapter is 40 to 50 pages.

2.1 The Geohydrologic Setting of the Site

A description of the geohydrologic setting. This section will concentrate on a specific geohydrologic setting (i.e., the Permian Basin, the Paradox Basin, the Gulf Interior region, the Southern Great Basin, or the Pasco Basin).

2.2 Identification of PASs Within the Geohydrologic Setting

A description of the process used for identifying the PASs within the geohydrologic setting.

2.3 Evaluation of the PASs within the Geohydrologic Setting

Evaluation of PASs considered within the geohydrologic setting against the disqualifying conditions. The evaluation will be based on currently available information, taking into consideration uncertainty in data. The results of this evaluation will represent a decision point as to whether the site is retained for further consideration (i.e., the site is not disqualified on the basis of available information).

The following disqualifying conditions will be used in this evaluation:

- Geohydrology, 960.4.2.1(d)
- Erosion, 960.4.2.5(d)
- Dissolution, 960.4.2.6(d)
- Human Interference (Natural Resources), 960.4.2.8.1(d)
- Population Density and Distribution, 960.5.2.1(d)
- Environmental Quality, 960.5.2.5(d)
- Rock Characteristics, 960.5.2.9(d)

2.4 Decision Process and Analysis Supporting Selection of the Preferred Site Within a Setting

This section will describe how the preferred site was selected from the PASs within the geohydrologic setting. It will include an evaluation of the available data base to determine those guidelines that allow a reasonable comparison of the sites within a setting. This will be followed by a comparative evaluation based on those guidelines of the sites within the setting.

References for Chapter 2

Chapter 3 THE SITE AND THE REPOSITORY

(Prepared by each Project)

The suggested length for this chapter is about 30 pages.

3.1 The Site

Description of the site, including those characteristics that may be affected both by site-characterization activities and by repository development at the site. The depth of the discussion should be commensurate with the importance of the potential effect, with less important material summarized or incorporated by reference. Graphics (maps, photos, diagrams) and tables should be used to organize and display information.

3.1.1 Location, General Appearance and Terrain, and Present Uses

3.1.2 Geologic Conditions

3.1.3 Hydrologic Conditions

3.3.1.1 Surface Water

3.3.1.2 Ground Water

3.1.4 Environmental Setting

3.4.1.1 Land Use

3.4.1.2 Terrestrial and Aquatic Ecosystems

3.4.1.3 Air Quality and Weather Conditions

3.4.1.4 Noise

3.4.1.5 Aesthetic Resources

3.4.1.6 Archaeological, Cultural, and Historical Resources

3.1.* Transportation

3.1.6 Socioeconomic Conditions

3.1.6.1 Population Density and Distribution

3.1.6.2 Economic Conditions

3.1.6.3 Community Services

3.1.6.4 Social Conditions

3.1.6.5 Fiscal Conditions and Government Structure

3.2 The Repository

A brief description of the repository itself, aimed at introducing the reader to concepts that will be discussed in Chapter 4, such as engineered barrier and controlled area.

References for Chapter 3

Chapter 4 SUITABILITY OF THE SITE FOR SITE CHARACTERIZATION AND FOR DEVELOPMENT AS A REPOSITORY

(Prepared by each Project except for Section 4.1)

The suggested length for this chapter is 40 to 50 pages.

4.1 Guidelines That Do and Do Not Require Site Characterization (Prepared by HQ)

The rationale for distinguishing between guidelines requiring site characterization and those not requiring site characterization.

4.2 Suitability of the Site for Development as a Repository; Evaluation Against the Guidelines That Do Not Require Site Characterization

The purpose of this section is to meet the requirements of Section 112(b)(1)(E)(ii) of the Act by evaluating the site proposed for nomination against the guidelines that do not require site characterization. The scope and content of this chapter will be determined by the definition of site characterization as contained in the Act. For each technical guideline there are qualifying, favorable, and potentially adverse conditions. This section will evaluate the site against these conditions, as applicable. Favorable and potentially adverse conditions need not be evaluated if they do not apply to the site being evaluated, and the evaluation of compliance with any condition need not be final.

The guidelines that do not require site characterization may include the following:

4.2.1 Technical Guidelines

4.2.1.1 Site Ownership and Control, 960.4.2.8.2

4.2.1.2 Population Density and Distribution, 960.5.2.1

4.2.1.3 Site Ownership and Control, 960.5.2.2

4.2.1.4 Meteorology, 960.5.2.3

4.2.1.5 Offsite Installations and Operations, 960.5.2.4

4.2.1.6 Environmental Quality, 960.5.2.5

4.2.1.7 Socioeconomic Impacts, 960.5.2.6

4.2.1.8 Transportation, 960.5.2.7

4.2.2 System Guidelines

4.2.2.1 Preclosure Radiological Safety, 960.5.1(a)(1)

4.2.2.2 Preclosure Environmental Quality, Socioeconomics and Transportation, 960.5.1(a)(2)

4.3 Suitability of the Site for Site Characterization: Evaluation Against the Guidelines That Do Require Site Characterization

The purpose of this section is to meet the requirements of Section 112(b)(1)(E)(i) of the Act by evaluating the site against the guidelines that do require site characterization. For each technical guideline there are qualifying, favorable, and potentially adverse conditions. This section will evaluate the site against these conditions as applicable. Favorable or potentially adverse conditions need not be evaluated if they do not apply to the site being evaluated, and the evaluation of compliance with any condition need not be final.

Because of the complex interactions among the many technical factors affecting the performance and suitability of any given site, both the qualifying and the disqualifying conditions must be evaluated in terms of their site-specific importance to meeting the system guidelines. Reference may be made to Chapter 2 for evaluation of the site against disqualifying conditions. Such evaluations cannot support comprehensive system performance assessments in the precharacterization phases; they will dictate a simplified preliminary assessment, based on available data, that evaluates the site's performance from a system analysis of the

technical guidelines. Guidelines that require site characterization may include the following:

- 4.3.1 Postclosure Technical Guidelines, 960.4.2
 - 4.3.1.1 Geohydrology, 960.4.2.1
 - 4.3.1.2 Geochemistry, 960.4.2.2
 - 4.3.1.3 Rock Characteristics, 960.4.2.3
 - 4.3.1.4 Climatic Changes, 960.4.2.4
 - 4.3.1.5 Erosion, 960.4.2.5
 - 4.3.1.6 Dissolution, 960.4.2.6
 - 4.3.1.7 Tectonics, 960.4.2.7
 - 4.3.1.8 Human Interference and Natural Resources, 960.4.2.8 and 960.4.2.8.1
- 4.3.2 Postclosure System Guideline, 960.4.1
- 4.3.3 Preclosure Technical Guidelines, 960.5.2
 - 4.3.3.1 Surface Characteristics, 960.5.2.8
 - 4.3.3.2 Rock Characteristics, 960.5.2.9
 - 4.3.3.3 Hydrology, 960.5.2.10
 - 4.3.3.4 Tectonics, 960.5.2.11
- 4.3.4 Preclosure System Guidelines
 - 4.3.4.1 Preclosure Ease and Cost of Construction, Operation, and Closure 960.5.1(a)(3)

Detailed guidance on the format for presenting the evaluation of the site proposed for nomination with respect to these technical and system guidelines is given in Attachment 1.

4.4 Description and Results of Performance Assessment

Additional guidance will be provided as a result of the performance assessment workshop to be held on November 14, 1983.

References for Chapter 4

Chapter 5 EXPECTED EFFECTS OF SITE-CHARACTERIZATION ACTIVITIES

(Prepared by Projects)

This chapter will describe the proposed site-characterization activities and discuss their expected effects, including irretrievable and irreversible commitments of resources. It will also discuss alternative activities that may be undertaken to avoid such effects and proposed measures to mitigate any significant adverse effects. Relevant issues raised in State, tribe, and public comments will also be addressed. The suggested length for this chapter is about 15 pages.

5.1 Site-Characterization Activities

This section will discuss all site-characterization activities that are planned for the site proposed for nomination, using the Act's definition of "site characterization."

5.1.1 Field Studies

5.1.2 Exploratory Shaft

5.1.2.1 Construction

5.1.2.2 Testing

5.1.2.3 Final Disposition

5.1.3 Other Activities

5.2 Expected Effects of Site Characterization

This section will describe the effects expected from each of the activities listed above. The depth of the discussion will be commensurate with the expected effect; the discussion can be presented as a narrative that covers all phases of site characterization, rather than separate sections for each phase. Included in the discussion will be both positive and adverse effects. It should cover, as appropriate, the characteristics and conditions listed in Chapter 3 (geologic conditions; hydrologic conditions; land use; ecosystems; air quality; noise; aesthetic resources; archaeological, cultural, and historical resources; population density and distribution; economic conditions; community services; social conditions; and fiscal conditions). Transportation effects, if any, can be included with social and economic effects.

5.2.1 Effects on the Physical Environment

This section will discuss the expected effects of site-characterization activities on various components of the physical environment (e.g., surface water, ecosystems, air quality), as appropriate.

5.2.2 Socioeconomic Effects

5.2.3 Irreversible and Irretrievable Commitments of Resources

5.3 Alternative Site-Characterization Activities That Would Avoid Adverse Effects

References for Chapter 5

Chapter 6 REGIONAL AND LOCAL EFFECTS OF LOCATING A REPOSITORY AT THE SITE

(Prepared by each Project)

This chapter will discuss the environmental, socioeconomic, and transportation effects expected to result from locating a repository at the nominated site and their significance. The discussion of effects will cover the preclosure phase of the repository (construction, operation, and closure), taking care to include only applicable effects for each phase. It will identify possible conflicts between proposed repository activities and the objectives of Federal, regional, State, local, and affected Indian tribe land-use plans, policies, and controls. A discussion of means to mitigate adverse environmental and socioeconomic effects will also be included. The discussion will distinguish between regional and local effects, and for local effects between onsite and offsite effects. The suggested length for this chapter is 20 pages.

Because of their potential significance, socioeconomic effects are given more detailed treatment in the outline that follows.

6.1 Expected Effects on the Physical Environment

This section will discuss the expected effects, if any, on geologic and hydrologic conditions; land use; ecosystems; air quality, noise; aesthetic resources; and archaeological, cultural, and historical resources.

*+ radiological & non-radiological
+ repository description*

6.2 Expected Effects of Transportation

+ radiological & non-radiological

6.3 Expected Effects on Socioeconomic Conditions

6.3.1 Population Density and Distribution

6.3.2 Economic Conditions

6.3.3 Community Services

6.3.4 Social Conditions

6.3.5 Fiscal Conditions and Government Structure

6.4 Irreversible and Irretrievable Commitments of Resources

References for Chapter 6

Chapter 7 COMPARATIVE EVALUATION OF SITES

(Prepared by HQ with input from Projects)

A comparative evaluation and discussion of all nominated sites against each guideline (including, in matrix form, a summary of data for each site against all guidelines, technical and system, and the qualitative results of performance assessment) and against one another.

Glossary

Acronyms and Abbreviations

Index

FORMAT FOR PRESENTING THE EVALUATION OF THE SITE WITH RESPECT TO THE TECHNICAL GUIDELINES (960.4.2 and 960.5.2)

- I. A description of how this section is organized
- II. Statement of qualifying condition
- III. Evaluation process
 - A. Relevant data
 - B. Assumptions and data uncertainty
 - C. Analysis (or reference to system calculations)
- IV. Favorable conditions
 - A. Position statement for each favorable condition
 - B. Brief statement of rationale (refer to position statement)
- V. Potentially adverse conditions
 - A. Dismiss those which do not apply
 - B. Discuss mitigating aspects where appropriate
 - C. For those remaining potentially adverse conditions, provide:
 1. Position statement for each potentially adverse condition
 2. Brief statement of rationale for each position
- VI. Conclusion on qualifying condition
 - A. Statement of position
 - B. Basis for conclusion given the evaluation at favorable and potentially adverse conditions individually and/or collectively.

FORMAT FOR PRESENTING THE EVALUATION OF THE SITE WITH RESPECT TO THE SYSTEM GUIDELINES

Nevada's approach to evaluating sites with respect to the system guidelines was not discussed. It will be discussed in detail in a separate workshop on Performance Assessment. The following is a suggested modification of Nevada's approach along the lines of the Technical Guideline format agreed to at the October 28 meeting.

- I. Description of how this section is organized
- II. Statement of qualifying condition
- III. Evaluation process
 - A. Statement of technical guidelines appropriate to system guideline
 - B. Composite consideration of evaluations of technical guidelines appropriate to system guideline (including preliminary performance assessments)
- IV. Conclusion on qualifying condition