



AGENCY FOR NUCLEAR PROJECTS  
NUCLEAR WASTE PROJECT OFFICE

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April 5, 1988

Mr. Ralph Stein, Director  
Engineering and Geotechnology Division  
Office of Civilian Radioactive Waste  
Management  
U.S. Department of Energy  
Washington, DC 20585

Dear Mr. Stein:

Thank you for your letter of March 18, 1988. Please be assured that the State of Nevada will continue to participate with the Department of Energy (DOE) and the Nuclear Regulatory Commission (NRC) in all meetings and workshops relative to the characterization of the Yucca Mountain site. In regard to the alternative conceptual models meeting scheduled for April 11-14, 1988, the State of Nevada and many of its researchers will attend and participate in this meeting, since we have raised concerns on this topic similar to those of the NRC, since at least 1984.

The need for the meeting on alternative conceptual models, was suggested by the NRC staff (letter of February 12, 1988, from B.J. Youngblood to you) as a result of the NRC having identified its preliminary concerns regarding the consultation draft site characterization plan (SCP/CD). It is quite clear that the NRC's primary purpose in suggesting the meeting(s) was to afford the DOE an early opportunity to understand, and potentially resolve or mitigate the NRC's concerns prior to its regulatory Site Characterization Analysis of the DOE's statutory Site Characterization Plan. Within this context, it is reasonable that the NRC raise the issue of alternative conceptual models of the geohydrologic setting in order to assure that the SCP's scope of inquiry is adequate, from a regulatory standpoint.

In the first of the suggested meetings (held March 21-24, 1988, with the participation of Nevada), DOE representatives indicated that a broad array of conceptual models had been reviewed and screened prior to the DOE arriving at a "preferred model" to guide further site plans and studies.

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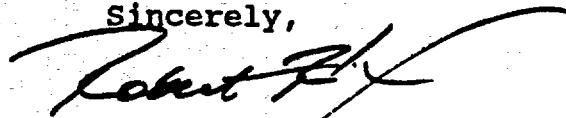
In simplistic terms, the NRC, as well as the State of Nevada, is looking forward to the DOE's description, and then joint discussion of the substance of this prior review and screening process. This will assist us in understanding the basis for the preferred model selection. In addition, it will aid in assuring, from our point of view, that the SCP does not exclude the possible discovery of data leading to alternative credible explanations of the site and setting that bear directly upon the evaluation and projection of the site's suitability for waste isolation.

Therefore, while the State of Nevada is pleased to fully cooperate and consult with the DOE in this endeavor, it is not the State's role to generate models alternative to those proposed by the DOE as a basis for comprehensive understanding of the site and geohydrologic setting of Yucca Mountain. Information and other data presented by the DOE on April 11-14 will be considered and discussed by Nevada representatives at the meeting, and eventually, if necessary, may be used by the State in its comments on the SCP. If the DOE proves unresponsive to Nevada's technical concerns during site characterization planning and implementation, the specific issues may arise again should the DOE seek a repository license from the NRC for the Yucca Mountain site.

I want to thank you, again, for your letter and assure you that the State of Nevada will be fully represented at the upcoming meeting in April on alternative conceptual models.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Robert R. Loux  
Executive Director

RRL/mm

cc: Nevada Congressional Delegation  
Nevada Commission on Nuclear Projects  
Nevada Legislative Committee on High-Level Radioactive Waste  
Robert Browning, NRC