54

- 1 -

Distribution

WM S/F
WMRP r/f
NMSS r/f
CF
REBrowning
MJBell
JBunting
MRKnapp
LBarrett
HJMiller
RBoyle
SCoplan
JLinehan
JKennedy
RCook
PPrestholt
TVerma
JGiarratana
KStablein & r/f
PDR & LPDR
KGano (O)

WM-11/KS/84/12/31/0

MAR 28 1985

Dr. Donald L. Vieth
Director
Waste Management Project Office
U. S. Department of Energy
Nevada Operations Office
P. O. Box 14100
Las Vegas, NV 89114-4105

Dear Dr. Vieth:

As part of the process of informal, pre-licensing consultation between NRC and DOE staff, members of the NRC staff and NRC consultants undertook a review of NNWSI rock mechanics/design testing procedures and test data at three locations in July and September, 1984. During July 17-20, 1984, NRC staff and consultants visited the Nevada Test Site and the Sandia National Laboratories, Albuquerque, New Mexico; during September 24-25, 1984, the staff reviewed additional NNWSI rock mechanics/design data at the USGS offices in Menlo Park, California.

Such data reviews allow the NRC to conduct its independent assessment of the quality and reliability of data that the DOE has gathered/generated in support of its potential license application. The scope of material reviewed includes the data itself, procedures used to gather and process the data, and documentation that the procedures have actually been used. A data review is solely an information gathering activity that focuses on examination of data by technical specialists. It includes briefings by investigators but involves no consultation with DOE or DOE contractors on interpretation, adequacy, or validity of data, nor is it in any sense a review of DOE's site characterization program or plans. Such matters are instead addressed at the technical meetings that are also a part of the pre-licensing consultation process conducted under the NRC/DOE Procedural Agreement.

During these visits and in my August 20, 1984 letter transmitting to you the Data Review Summary for the July visits, the NRC agreed to provide the DOE with comments concerning the items reviewed after we received copies of data requested during those visits. The bulk of the data requested was sent to the DOE (Hunter (SNL) October 19, 1984 letter to Szymanski (DOE)) and was subsequently received by us on November 2, 1984. We have completed a review of

WM Record File
102.2

WM Project 11
Docket No.
PDR ✓
LPDR ✓

Distribution:
J Gorn, OGC

(Return to WM, 623-SS)

8505170322 850328
PDR WASTE
WM-11 PDR

NMOLLOY H

6025

that data. The attachment to this letter contains our comments on that data and on the data reviewed during the site visits.

I would like to call your attention to the length of time--over three months--that was required for DOE to provide us with the data requested. The NRC/DOE Site-Specific Procedural Agreement calls for hard copy of data requested by the NRC to be provided "normally" within 45 days of its acquisition and after initial quality assurance checks have been performed. The DOE contractor's (Sandia National Laboratory) delay in this instance was apparently due to the contractor not previously having a procedure established for the early release of unpublished data. The contractor considers that with a system in place to accomplish the early release of data, future requests will be addressed much more expeditiously.

Regarding the data one point recurs in a number of the attached comments: namely, inadequate documentation of various items, including calibration data, acceptance/rejection criteria, and data reduction and test procedures. It is especially important that for future tests all of these be documented prior to starting the tests and that changes made during testing be clearly noted. Increased emphasis in this area will facilitate establishment of the reliability of needed data at the time of licensing.

We hope that data reviews and followup comments such as those provided herein are a useful mechanism for NRC/DOE interaction and identification of areas where necessary improvements can be achieved prior to licensing. We would appreciate your informing us on actions being taken to respond to our concerns; furthermore, we anticipate resolution of comments raised herein through followup technical meetings in design/rock mechanics areas after we complete the EA reviews.

OFC	WMRP	WMRP	WMRP	WMRP	WMEG	WMRP	
NAME	KStablein:lem	SCoplan	Kennedy	Linehan	JGreeves	Miller	
DATE	03/ /85	03/ /85	03/ /85	03/ /85	03/ /85	03/ /85	

If you have any questions concerning these matters or the comments attached, please contact Dinesh Gupta (FTS 427-4742) or King Stablein (FTS 427-4611).

Sincerely,

"ORIGINAL SIGNED BY"

Seth M. Coplan, Section Leader
NTS Project Section
Repository Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure:
Tanious to Stablein Memo of 12/14/84

cc: T. Hunter, SNL
W. Dudley, USGS
W. Purcell, DOE

End in File + PDR/LPDR
102

OFC	:WMRP	: WMRP	:WMRP	:WMRP	:WMEG	:WMRP	:
NAME	:KStablein:lem	SCoplan	:Kennedy	:Linehan	:JGreeves	:MMiller	:
DATE	:03/21/85	: 05/22/85	:03/26/85	:03/27/85	:03/28/85	:03/27/85	: