

405/OK/85/06/03

JUN 25 1985 - 01

- 1 -

Distribution
 WM 3405
 WMRP r/f
 NMSS r/f
 CF
 REBrowning
 MJBell
 PAI tomare
 HJMiller
 JLinehan
 JKennedy
 SCoplan
 RBoyle
 RJohnson
 RWright
 FCameron
 DMattson
 KStablein

JGreeves
 JBunting
 WAltman, IE
 DHedges
 SBilhorn & r/f
 MDelligatti
 FForscher
 MTokar
 JTrapp
 PDR JLPDR

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

Dear Dr. Veith:

During the QA site visit of December 13-14, 1984, the NNWSI project provided a list of ten questions to the NRC concerning quality assurance matters. The NRC team provided responses to all of the questions during the meeting, but also committed to a formal response. The purpose of this letter is to transmit that formal response, which is attached as an enclosure.

It is important to emphasize that DOE should have complete and fully implemented QA programs in place at the start of site characterization at the latest, and preferably as soon as possible. In addition, for tests and other activities now underway which may eventually be used in licensing, it is important that they be well documented so that their quality can be determined at a later date if necessary.

If you have any questions concerning the responses, please feel free to contact J. Kennedy of my staff (FTS 427-4786).

"ORIGINAL SIGNED BY"

Hubert J. Miller, Chief
 Repository Projects Branch
 Division of Waste Management
 Office of Nuclear Material Safety
 and Safeguards

cc: W. Purcell, DOE-HQ
 R. Stein, DOE-HQ
 C. Head, DOE-HQ
 C. Newton, DOE-HQ
 L. Olsen, DOE-BWIP
 J. Neff, DOE-SRPO

WM Record File 102.2
 WM Project 11
 Docket No. _____
 PDR
 LPDR

Distribution: _____

 (Return to WM, 623-SS)

8508010654 850625
 PDR WASTE
 WM-11 PDR

Record Note: This letter and attachment was coordinated with WMPC (M. Delligatti).
 *See previous concurrence

OFC	:WMRP:rs	:WMRP	:IE	:WM	:	:
NAME	:JKennedy*	:HMiller*	:Waltman*	:RBrowning*	:	:
DATE	:06/14/85	:06/17/85	:06/14/85	:06/20/85	:	:

NY102238

H
693

Enclosure

NRC Staff Responses to
NNWSI QA Site Visit Questions

- Q1. Is the NRC's position that if the DOE meets the intent of Appendix A of the NRC QA Review Plan, dated June 1984, the criteria of 10 CFR 50, Appendix B will be satisfactorily implemented? Will the NRC recognize another document as being acceptable to follow to implement the criteria of 10CFR50, Appendix B (e.g., NQA-1 or 45.2)?
- A1. The QA Review Plan was specifically developed to explain how the 10 CFR Part 50 Appendix B QA criteria referenced in Subpart G of 10 CFR Part 60 are to be applied during the site characterization phase. If the DOE meets the guidance of Appendix A of the Review Plan, the staff considers that the requirements of Subpart G will have been satisfied. It should be noted, however, that portions of the Review Plan guidance are subject to different interpretations and therefore agreement between NRC and DOE staffs on specific issues will be needed. Several of these issues and interpretations were discussed during the QA site visits in December, 1984 including determination of the "Q" list, the use of graded QA, and independence of the QA organization. It is expected that the existing mechanisms for resolving generic and site-specific issues that are already in place, such as documented results of meetings and staff technical positions, will be utilized in this effort.

With respect to the second half of the question, concerning NRC's recognition of other documents as being acceptable for meeting the Appendix B requirements, the staff intends to utilize existing documents, such as NQA-1 and ANSI 45.2, to the fullest extent possible, where these documents provide clear and relevant guidance for defining, reviewing, and implementing QA programs for the HLW repository and do not contradict the requirements or guidance in Appendix B or the QA Review Plan. One recent example of a document which does not meet these criteria is Part 2.20 of NQA-2 which addresses subsurface investigations for nuclear reactor siting. Part 2.20 was undergoing modifications by the ASME to include site characterization investigations for repositories, but the staff believed that it would not adequately clarify the general requirements and guidance already in place, such as NQA-1. The NRC voted negatively in the ASME ballots on revising this document for HLW repositories to help avoid a proliferation of requirements documents which provide overlapping and potentially conflicting guidance. If the DOE staff has doubts or questions as to the adequacy of a particular document, they should consult

with the NRC staff on a case-by-case basis. To do otherwise is to risk developing a program which would not be acceptable for licensing.

As a general rule and wherever practical, the NRC program requirements developed for the repository will be consistent with those imposed on reactor licensees. The reactor staff of the NRC is finalizing endorsement of NQA-1 (in Regulatory Guide 1.28 Revision 3) as being acceptable for meeting the requirements of Appendix B Part 50. Several additional staff positions were provided in the Regulatory Guide as a condition of the endorsement. The ASME/ANSI is currently in the process of modifying NQA-1 to include guidance for the HLW program in such areas as peer reviews, test control, and records. This process is still in its early stages and it would be premature for the NRC to formally endorse NQA-1 for the repository program until these and other appropriate revisions have been made. In the meantime, however, many areas of the existing NQA-1, such as independence of the QA organization, procurement control, and audits, compliment the QA Review Plan and can provide more detailed guidance to the DOE. The NRC staff will accept use of NQA-1 in the areas that do not contradict the guidance of the Review Plan. Where the DOE is uncertain as to the applicability of a particular section, it should develop independently a sound and defensible rationale for whichever approach is decided upon. The DOE is also advised to consult with the NRC staff on specific interpretations after an internal decision has been made to obtain additional confidence in the approach selected.

- Q2. What is the NRC's position regarding a graded QA approach? Will the NRC be involved with activities that are not radiologically related, e.g., other than important to waste isolation or important to safety as per 10 CFR 60?
- A2. NRC regulations (10 CFR Part 50 Appendix B) permit the application of a graded QA approach within the items and activities covered by the NRC required QA program. These are items and activities which are important to safety or waste isolation as defined in 10CFR Part 60 and comprise what is referred to as the Q-list. At this point in time no generic comprehensive implementation guidance for grading of QA programs exists either for reactors or for HLW activities. Some general guidance is contained in Appendix 4A of NQA-1. In the experience of the staff, graded QA is most often found in the type and amount of testing and/or verification/inspection applied to an item or activity, the extent of involvement of the independent QA organization in audits, surveillances, & other reviews, and the extent of recordkeeping. The key to development of a graded QA approach would be to relate the QA activity to its safety or waste isolation significance in meeting the Part 60 performance

objectives via an analytic approach that is logical, repeatable, internally consistent, documented, and technically defensible.

Grading of QA during the early stages of the program may be difficult given the absence of any unambiguous measure of how important individual items and activities will be to safety and waste isolation due to the insufficient amount of available data. At this point, the prudent approach would be to treat everything with an equal (high) level of quality effort. DOE can reduce the extent of QA in some areas where they can show that the amount of QA is consistent with plans on allocation of performance to components of the repository systems. The topic of performance allocation is addressed with greater detail in the NRC comments on the DOE Mission Plan (see objection #4 of Enclosure 2 in letter to Ben Rusche, DOE, dated July 31, 1984).

The DOE efforts toward developing a graded approach to QA should be undertaken with the following thought in mind: the adequacy of the quality assurance applied to any aspect of the HLW program will be judged in the licensing process and in the hearings. DOE needs to have a logical, defensible and documented approach to whatever graded QA approach(es) DOE eventually implements. During the prelicensing consultation phase, the NRC staff remains willing to participate in any DOE discussions/meetings that address this topic, and to review specific DOE proposals for developing a comprehensive approach to grading QA activities in the HLW program.

With respect to the second part of the question concerning NRC involvement in activities which are not radiologically related, the Appendix B QA program applies only to those items and activities which are important to safety or waste isolation (see Subpart G of Part 60 for specifics on the applicability of the QA program). In its licensing review under Part 60, however, (see section 60.31 for standards for NRC issuance of a construction authorization to DOE), the NRC considers and assesses matters not only related to public health and safety, but also the common defense and security (i.e. safeguards), the environment, worker safety, and other areas. The QA measures to be applied in these programs are addressed in other NRC documents and criteria. Part 20, for example, contains various provisions related to monitoring, use of procedures, and recordkeeping which, while not referred to as "QA", are, in fact, assurance measures for providing confidence in the quality of the work performed. QA programs will be necessary for environmental monitoring (see, for example, Regulatory Guide 4.15, "Quality Assurance for Radiological Monitoring Programs (Normal Operations)-Effluent Streams and the Environment"). These other QA measures are not reviewed under the Appendix B QA program, but are generally handled as part of the technical reviews performed by

the NRC technical staff. DOE must still be able to adequately document and demonstrate compliance with those requirements in order to obtain a license.

- Q3. An important part of Site Characterization and the assessment of the natural barrier for waste isolation is the information gathered from the performance of experiments and research. Where the information obtained is not used directly as input to design performance assessment, or modeling, but is used to point a direction for further activities, do the QA requirements of the Review Plan apply?
- A3. The QA program described in the Review Plan applies to all information and activities required to demonstrate that a particular site meets the performance objectives and other criteria in 10 CFR Part 60. Information contained in or referenced in the license application to support the Part 60 findings should fall under the Subpart G QA program. It is unlikely that DOE will know, prior to initiation of tests, whether the data to be obtained will be used to support the licensing application and should therefore have the Appendix B QA program applied to it. Given the uncertainties that will exist even at licensing time, especially with respect to geology-related matters, it is most likely that every piece of data available will be utilized by DOE in assessing performance and making findings. All data collected will be subject to review and challenge by NRC staff and intervening parties to licensing hearings including those data which do not agree with subsequent confirmatory testing and which thereby may alter the results of performance assessments. This would include information already collected at sites. Without documented action of the kind described in NRC letters on data reviews conducted in 1984 (letter from S. Coplan, NRC to D. Veith, DOE dated March 28, 1985), licensing reviews and proceedings can be severely disrupted.

As phrased, the DOE question stated above omits consideration of information which not only points a direction for further activities, but also will be utilized indirectly in performance assessments. This information needs to have QA applied commensurate with its importance to waste isolation, if this is known or can be conservatively estimated or described. The staff notes that the USGS proposals for grading QA presented at the December 1984 NNWSI QA site visit deal with this issue and deserve further consideration by both our staffs in the near future. The basic problem at this early stage of the program is that without knowing how important individual activities or components of the natural system will be in contributing to the overall performance of the repository it will be difficult, if not impossible, to grade QA.

- Q4. What is NRC's position regarding the use of information from recognized technical journals as input to design, experiment, or research activities? If used, must this information be verified, validated, or authenticated prior to use?
- A4. Any data used in the license application to demonstrate that the performance objectives and design criteria of Part 60 have been met must be obtained under the QA program. In the case of data found in technical journals where DOE does not repeat the work or perform similar examinations, the data must be authenticated so that the results can be defended as adequate in the licensing process. DOE should propose specific approaches for reviewing such data based on these considerations and consult with the staff on their potential acceptability for licensing. DOE should also furnish specific cases and examples for the staff to review and comment on.
- Q5. What does NRC mean by conceptual (thought notion, abstract of ideas) as it relates to design control? (ref. 3.1 of NRC QA Review Plan). Conceptual is a basis thought notion or an abstract of ideas. It is the NNWSI position that the QA controls implied by the NRC QA Review Plan will start with Title I design activities.
- A5. The term "conceptual design" as used by the NRC originates in 10 CFR Part 60, section 60.11(a)(6)(ii), and has a definition which may be different from the same term when used in design organizations. This section of the regulation requires the DOE to submit in their Site Characterization Plan a "conceptual design" of sufficient detail to allow the NRC to make a determination (1) if the types and quantities of testing and analysis to be performed during site characterization will be adequate and (2) whether the suitability of the site will be compromised by the facilities that will be constructed during site characterization. These reasons for submitting a "conceptual design" in the SCP are consistent with the NRC's responsibility during the prelicensing phase to review DOE approaches early on and identify issues which could eventually affect the licensability of a site. The staff has recently issued a document entitled "Draft Generic Technical Position on Design Information Needs at the Time the Site Characterization Plan is Submitted" which provides more specific information on the types and amounts of design information to be included in the SCP.

Section 3.1 of the QA Review Plan states that the design control program for the conceptual design should be implemented by the time the SCP is submitted. Failure to implement the design control program at that time could lead to development of site characterization plans and tests based

on incorrect premises (e.g. incorrect design bases) or errors later in the program when changes are being made to the conceptual design. Because the results of many of site characterization tests will be the subject of license reviews, it is important that a QA program be in place to help assure that the results will be adequate for licensing and work will not have to be repeated. We therefore do not agree with the NNWSI position stated above. We believe that failure to effectively implement the QA program early could affect DOE's ability to license a site.

- Q6. Is it the NRC's intent that QA become involved in special process qualifications beyond the activities of surveillance and audit? (ref. 9.3 of the NRC QA Review Plan)
- A6. Section 9.3 of the QA Review Plan states that "Procedures, equipment, and personnel associated with special processes are [to be] qualified and are [to be] in conformance with applicable codes, standards, QA procedures, and specifications. The QA organization is [to be] involved in the qualification activities to help assure they are satisfactorily performed."

There is some ambiguity in the question. We interpret the question to essentially be: given that the formal quality assurance organization has the responsibility to conduct surveillances and audits of the entire special process program activities, is it the NRC's intent that the formal quality assurance organization become involved as part of the in-line approval process for the qualification of procedures/processes and personnel for the performance of special processes?

As with all procedures and processes, the answer to this question is no, it is not the NRC's intent that the formal QA organization must become involved in the in-line approval process, provided that the formal QA organization maintains a surveillance and audit program which contains appropriate and sufficient programmatic and technical reviews to assure the achievement of quality within the overall program. Amplification of this position is given below.

The management and QA controls embodied in 10CFR Part 60 and Appendix B do make it incumbent upon management to ensure that special process activities, as well as any other activities that may be important to safety or waste isolation, be subject to management controls that ensure that the activities are established and conducted in a technically correct manner. Generally, the line organization (e.g. engineering) is responsible for quality of the implementation of the special processes program. Subsequent formal review of the implementation of the special

process program should embody both procedural and technical considerations; procedural to ensure that the established program is being followed, and technical to ensure that the program, as implemented, is achieving the desired results (i.e., to determine how effective the program is). It is management's responsibility to ensure that both kinds of implementation reviews are performed periodically, results documented, and effective corrective action taken to address identified problems.

Management has flexibility in determining how such a review program is organized, staffed, and executed. It may choose to combine the procedural and technical implementation reviews or perform them separately. There is no requirement that the QA organization perform or participate in the formal technical implementation reviews, as long as the technical reviews are periodically conducted, but the results of such reviews should be available to the QA organization and used by them in the programmatic implementation reviews, such as surveillances and audits. The QA organization will normally perform surveillances and audits of programmatic aspects associated with special processes, (i.e., are applicable procedures in place, are they being followed, is there an effective corrective action program for identified problems?).

From reactor experience, the NRC has observed that in some of the more effective utility programs, the utilities have chosen to ensure that the personnel performing the surveillances or audit activities conducted under the auspices of the QA program are knowledgeable in the technical areas being reviewed. Such personnel may be either part of the QA organization, or technical specialists from other organizations used to support the surveillance or audit activity. Knowledgeable personnel are better able to assess the effectiveness of the subject activity and determine if it is achieving the desired results. Review teams not utilizing such personnel tend to focus more on the programmatic aspects of the activity (i.e. are there written procedures, are they being followed), rather than on whether the results of the activity are consistent with what the activity is supposed to achieve. Such reviews (i.e. those not including technically astute reviewers) must guard against becoming little more than checklist-heavy paperwork exercises which provide management with little useful information regarding how well a program is meeting its objectives.

- Q7. Is the NRC's position that the QA organization should actually perform all inspection activities? (ref. 10.2 of the NRC QA Review Plan)
- A7. Section 10.2 of the NRC QA Review Plan states: "Organizational responsibilities for inspection are described. Individuals performing inspections are part of the QA organization. For inspections requiring

special expertise, other individuals may be used provided the independence of the inspection function is maintained."

Therefore, the answer is no, the formal QA organization need not be tasked with the responsibility for performing all inspection activities. The following position discussion is meant to amplify and clarify the above passage from paragraph 10.2 of the NRC QA Review Plan.

The integration of the mandatory and nonmandatory guidance found in ANSI/ASME NQA-1-1983, Basic Requirements Section 1; Supplement 1S-1, Section 2.1; and Appendix 1A-1, Section 2, provides a position that closely reflects current NRC policy. NQA-1 states that "quality assurance should be recognized as an interdisciplinary function involving many organizational components and, therefore, should not be regarded as the sole domain of a single quality assurance group." Indeed, everyone is responsible for the achievement and assurance of quality in their work activities. NRC requirements stipulate that, beyond this individual level of assurance, there must be a formal program to provide independent confirmation of the achievement of quality in safety-related activities. NQA-1 goes on to say that "the organizational structure and the responsibility assignments [for inspection activity in this instance] shall be such that: (a) quality is achieved and maintained by those who have been assigned responsibility for performing work; and (b) quality achievement is verified by persons....not directly responsible for performing the work." As such, the persons or organizations performing the QA activities (inspections), when not part of the formal QA organization, "shall have sufficient authority, access to work areas, and organizational freedom to (1) identify quality problems; (2) initiate, recommend, or provide solutions to quality problems through designated channels; (3) verify implementation of solutions; and (4) assure that further processing, delivery, installation or use is controlled until proper disposition of a nonconformance, deficiency, or unsatisfactory condition has occurred." When these persons or organizations who perform the inspection activities are not part of the formal QA organization (i.e., part of line management), then the "quality assurance group should overview and monitor the agreed upon quality assurance activity [inspections]." These comments apply not only to inspections of hardware, but particularly to design and data collection activities conducted during the site characterization phase.

- Q8. What is the NRC's intent regarding further DOE/NRC interchanges, formal inspections/audits, or informal information exchanges? If the latter, when will this change?

- A8. The interactions between the DOE and NRC during the prelicensing phase of the repository program (i.e. until a license application is submitted, now scheduled for 1990) are defined in the Nuclear Waste Policy Act, 10 CFR Part 60, in the NRC/DOE Procedural Agreement (FR38701, August 25, 1983), and in the the Site Specific Procedural Agreements (see letter from W. Bennett, DOE to R. Browning, NRC, dated September 9, 1984). The purpose of these agreements is "to assure that information flow is maintained between the two agencies which will facilitate the accomplishment by each agency of its responsibilities relative to site investigation and characterization..." With respect to the NRC's responsibilities, this means providing timely guidance to DOE on NRC regulatory requirements and reviewing DOE plans for conducting site activities to identify early on concerns or issues which could potentially affect the licensability of a site. Specifically, this means that NRC and DOE staffs need to agree on what information (i.e. data and data collection/analysis methods) are acceptable for the purposes of making findings on the requirements and criteria of 10 CFR Part 60. It also means that NRC must monitor and observe work in progress and the results of completed work on an ongoing basis in order to identify any potential licensing issues promptly as they arise. The formal inspections normally associated with licensing are expected to begin after the construction authorization application is submitted.

The existing procedures for NRC/DOE prelicensing interactions provide for meetings between the NRC/DOE staffs, data reviews by the NRC staffs, assignment of a full time on-site licensing representative to each of the projects, and other interactions. At this time, assuming that the procedures in place are found to be effective, we see no need to modify the approach already in place in the Procedural Agreements.

- Q9. What is the role of I&E in the Waste Management Project?
- A9. At this early point in the prelicensing process, IE's role is not one of inspecting and enforcing (there is nothing yet to provide the basis for inspection and enforcement activities), but rather one of QA consultant to the Office of Nuclear Material Safety and Safeguards to help establish in more detail what is contained in 10 CFR Part 60 licensing information needs and requirements. IE will continue to be involved in this role with the NRC's Division of Waste Management in the area of quality assurance during the prelicensing phase of the repository program. As the prelicensing phase develops, IE will become part of the NRC team involved in reviewing implementation of the QA program associated with the repository.

IE has special expertise in QA which can be utilized in the HLW program. Some of the QA practices and programs developed for reactors, as well as lessons learned from reactors, can be equally applicable to the repository program. For example, IE has the lead responsibility for endorsing NQA-1 through Regulatory Guide 1.28 Revision 3, and the Division of Waste Management will rely in large part on this work in future applications in the repository program.

- Q10. Section 2.3 of the NRC Standard Review Plan contains a quote from NRC Regulatory Guide 4.17 which states in part that "The QA methods should be presented in sufficient detail to allow NRC to make an independent evaluation of the precision, accuracy, reproducibility, analytic sensitivity, and limitation of data acquisition and analysis methods that were used during site exploration and will be used during site characterization." In section 3.1, 2nd paragraph, of the NRC Standard Review Plan, it states, "A list of QA and technical procedures which implement the program description in the Site Characterization Plan should be identified and referenced in the SCP." It appears that the Standard Review Plan has established two different levels of detail for the same requirement. Is it NRC's intent that all the procedures used on the NNWSI Project be paraphrased in the QA section of the SCP or will reference to the procedures satisfy the intent as implied by the NRC QA Review Plan?
- A10. The SCP should contain descriptions of the QA programs to be applied during the site characterization phase and reference detailed QA and technical procedures. All procedures need not be paraphrased in the SCP. More details on exactly what is required in the SCP have been the subject of recent consultation between the NRC and DOE staffs. In February of this year, our staffs discussed the Annotated Outline prepared by DOE which expands on and interprets the guidance in Regulatory Guide 4.17. The NRC staff found this outline to be generally acceptable for use in preparing the SCP. In addition, Regulatory Guide 4.17 is in the process of being revised (the final revision is expected to be issued in the near future). The latest revision is consistent with the guidance given in the Quality Assurance Review Plan.

It should be emphasized that not only must the description of the QA program be complete in the SCP, but that also the references utilized to support the descriptions must be made available to the staff prior to or at the time of SCP issuance (see the Introduction to Rev. 1 of Regulatory Guide 4.17, "Standard Format and Content of Site Characterization Reports for High-Level Waste Geologic Repositories", pages x and xi, for additional details on this subject).

405/JK/85/06/03

- 1 -

Distribution:
 WM S/F 3405
 WMRP r/f RJohnson
 NMSS r/f Waltman, IE
 CF DHedges
 REBrowning SBilhorn & r/
 MJBell MDelligatti
 JBunting FForscher
 MRKnapp MTokar
 JTGreeves JTrapp
 HJMiller PDR
 RRBoyle
 SMCoplan
 JJLinehan
 FCameron
 DMattson
 RWright
 KStablein

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

Dear Dr. Veith:

During the QA site visit of December 13-14, 1984, the NNWSI project provided a list of ten questions to the NRC concerning quality assurance matters. The NRC team provided responses to all of the questions during the meeting, but also committed to a formal response. The purpose of this letter is to transmit that formal response, which is attached as an enclosure.

If you have any questions concerning the responses, please feel free to contact J. Kennedy of my staff (FTS 427-4786).

*DO NOT
 TYPE
 DUPLICATE*

~~Robert E. Browning, Director
 Division of Waste Management
 Office of Nuclear Material Safety
 and Safeguards~~

*Hubert J. Miller, Chief
 Repository Projects Branch
 D of W M*

Record Note: This letter and attachment was coordinated with WMPC (M. Delligatti).

OFC	: WMRP:rs	: WMRP	: IE	: WM	: WM	:	:
NAME	: JKennedy	: HMiller	: Waltman	: MJBell	: REBrowning	:	:
DATE	: 06/14/85	: 06/ /85	: 06/14/85	: 06/ /85	: 06/ /85	:	:

405/JK/85/06/03

- 1 -

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

Distribution

WMP r/f	KStablein
NMSS r/f	RJohnson
CF	WAltman, IE
REBrowning	DHedges
MJBell	SBilhorn & r/f
JBunting	MDelligatti
MKnapp	FForscher
JGreeves	MTokar
HMiller	JTrapp
RBoyle	PDR
SCoplan	
JLinehan	
FCameron	
DMattson	
RWright	

Dear Dr. Veith:

During the QA site visit of December 13-14, 1984, the NNWSI project provided a list of ten questions to the NRC concerning quality assurance matters. The NRC team provided responses to all of the questions during the meeting, but also committed to a formal response. The purpose of this letter is to transmit that formal response, which is attached as an enclosure.

If you have any questions concerning the responses, please feel free to contact J. Kennedy of my staff (FTS 427-4786).

Hubert J. Miller, Chief
Repository Projects Branch
Division of Waste Management

DO NOT
TYPE
A/P

Record Note: This letter and attachment was coordinated with WMPC (M. Delligatti).

* See previous concurrence

OFC :WMP:rs	:WMP	:IE	:	REY	:	:
NAME :JKennedy *	HMiller	:WAltman *	:	BROWNING	:	:
DATE :06/ /85	:06/17/85	:06/ /85	:	2/20/85	:	: