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PROJECT WM-11/AE/83/11/03/0

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Dr. Donald L. Vieth, Director
Waste Management Project Office
Department of Energy
Nevada Operation Office
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Dear Dr. Vieth:

I am writing in reference to your letters dated October 13, and 21, 1983 with regard to the indefinite postponement of four workshops previously scheduled as follows: (1) Performance Assessment, October 13; (2) Geochemistry, October 25-26; (3) Repository Design, November 8-9; and (4) Quality Assurance, during the week of December 7. When you informed me of these postponements by telephone before sending the letters, I expressed concern that they be rescheduled in sufficient time to allow the NRC staff to become familiar with data prior to the time that the draft Environmental Assessment (EA) will be made available for public comment.

Under the NWPA, the EA is a principal document in support of site screening decisions. As such, we anticipate that it will be a major technical review of investigations conducted to date at all of the sites being investigated by the DOE. Accordingly, we would also expect that sufficient information will be provided (a) to establish the accuracy, reliability and applicability of the data and (b) to support interpretations of data made in applying the siting guidelines. Therefore, either by directly presenting them in the EA itself, or by reference to other documents and information sources, we would expect the EA to present all of this data and the DOE interpretation of it in terms of basic features that will determine site suitability (i.e. the selection factors established in siting guidelines). This data base is massive. It includes raw data and detailed information about their collection and many levels of data reduction and assessment. In the data base are the results of the hydrogeology, geology, geochemistry and engineering tests and investigations of potential sites. Specific examples of such data include hydrologic heads, lithologic, drillers and other well logs, material properties and many others.

Experience in connection with both the BWIP SCR and earlier NTS workshops has shown that our data interpretations can be significantly different from those of the DOE. We will, of course, be doing a thorough data review in connection with our review of the SCP. At that time, we will

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review the existing data to establish what is known and not known about the site. However, I trust that you would agree that it would be prudent for NRC to complete a comprehensive review and criticism of the data base and interpretations made by DOE in the draft EA before major suitability decisions are made.

Therefore, for the purpose of EA review, the NRC staff needs the opportunity to examine the data and information base where wide dissemination is not possible because of form or recency of collection. In addition, we will need to be briefed on the assessment models and codes DOE plans to use for the quantitative assessments of performance, if any, that will be included in the EAs. We need the opportunity for in depth data review and limited consultation with the principal investigators on location in the near future in each of the technical areas that will be addressed in the EA. This should amount to no more than what you are already doing to make data available to the state; it could be done in a way that requires little more than making space available for NRC staff and providing someone to guide them to specific data. Also, it would facilitate our preparation for the review if you would send us an outline, table of contents, and a set of all of the references for the EA as early as practicable before the draft EA is issued.

The cancelled workshops had a dual purpose: (1) review of existing data and data interpretations to identify potential licensing issues and (2) consultation on plans to generate data to resolve those issues. A data review of the kind described above for the EAs addresses the first purpose; however, there may also be plans for gathering data which are on the licensing critical path that need to be discussed. We should discuss ways that we can effectively deal with any such items.

Please call me as soon as possible so that we can establish an approach and schedule that will allow the NRC staff to complete its pre-EA review preparations.

Sincerely yours,

"ORIGINAL SIGNED BY"

Seth M. Coplan, Project Manager
Repository Projects Branch
Division of Waste Management

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