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WM Record File

WM Project 11

102.2

Docket No. _____

PDR

LPDR N

Distribution:

Jungling

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Loplan

(Return to WM, 623-SS)

T. JOHNSON

DEM L3

16 October 1985

TO: Tom Jungling - NRC Waste Management

FRGM: Lyn Ballou - NNWSI/LLNL *[Signature]*

SUBJECT: Draft Telecon Record Memo

Please review this draft and call me with your comments. I need to transmit this to the DOE-NU within a day or two. Does this sound like the same discussion you were at the other end of ??

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16 October 1985

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MEMORANDUM FOR RECORD OF NRC INTERACTION

DATE/TIME: 16 October 1985 - 10 AM

KING STABLEIN

PARTICIPANTS: NRC - Seth Coplan, Tim Johnson, Tom Jungling

LLNL - Lyn Ballou, Larry Ramspott, Virginia Oversby,
Dan McCright, Mike Revelli, Ed Russell

SUBJECT: 10 CFR 60 Provisions relating to "anticipated and unanticipated processes and events"

SUMMARY:

During the NNWSI/NRC meeting on 23-24 July 1985, LLNL asked for guidance relating to the various provisions of Part 60 that refer to assessments of performance and compliance with performance objectives under anticipated and unanticipated processes and events. NRC indicated that the staff appropriate to discuss this subject were not present, but that they would follow up on the request at a later date. This topic was identified as an open item in the Meeting Summary.

A telephone conference was arranged by Jungling and Ballou to discuss the subject. This memo summarizes that teleconference.

Ballou restated the request for clarification of the NRC intent in two sections of the rule. Specifically, in Subpart B, Section 60.21(c)(1)(ii)(C), the requirement for an evaluation of the repository performance under both anticipated and unanticipated processes and events in the SAR is stated. In Subpart E, Sections 60.112 and 60.113, there are several references at the system and subsystem level to performance objectives assuming anticipated processes and events, and a "wild card" reference in 60.113(c) to additional requirements that may be necessary related to unanticipated processes and events.

Coplan responded to the request with a discussion of the distinction between the procedural sections of the rule (Subparts A-D) and the technical sections (Subparts E-I). He indicated that the intent is for the assessments in Subpart B to show compliance with the technical criteria in Subpart E. Recognizing that rigorous "proof" of compliance in the strict sense will not be possible, the assessments will have to consider the consequences of unanticipated scenarios and will require probabilistic evaluations in the development of a "complementary cumulative distribution function" (Appendix B, 40CFR191). He indicated that an equivalent level of attention would be needed to both anticipated and unanticipated conditions in order to support these assessments. LLNL pointed out that this position can have major implications on the R&D program required to establish a data base needed to support the assessments.

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The discussion then turned to some of the inconsistencies between the present Part 60 and the recently issued 40 CFR Part 191. In particular, Part 191 does not use the terms "anticipated" and "unanticipated" in the context of Part 60, but introduces the (undefined) term "significant processes and events" in Section 191.13(a). NRC indicated that rulemaking is in progress to revise Part 60 to conform to both the NWA and the EPA rule, but those involved in this discussion were not aware in detail of what, if anything, was being done in that activity to deal with these differences in terms.

Finally, *Ray* raised the point that this whole topic was of a specific basis. Coplan agreed, and indicated that NRC would consider a direct interaction with DOE/OCRWM to deal with this subject at the program level. NRC also agreed to review and determine the intent of the reference to additional requirements in 60.113(c). LLNL expressed their appreciation for the effort by NRC to assist in clarifying the intent of the rule, and the conference call was terminated.

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SUFFICIENTLY BROAD PROGRAM NATURE THAT IT WAS PROBABLY INAPPROPRIATE TO PURSUE THE SUBJECT FURTHER ON AN NNW SE OR WASTE PACKAGE

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LAWRENCE LIVERMORE NATIONAL LABORATORY

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OMNIFAX G32:

VERIFICATION:

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FROM: Lyn Ballou
LLNL

TO: Tom Jungling
NRC

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NUMBER OF PAGES, EXCLUDING COVER SHEET 3
Barbara Bryan SIGNATURE DATE: 10-17-85

FROM LLNL		DATE OF DOCUMENT Oct. 16, 1985	DATE RECEIVED 10/22	NO. WM-85942
TO Tom Jungling		LTR	MEMO XX	REPORT OTHER
CLASSIF		POST OFFICE	REG. NO.	FILE CODE: WM-102.2
DESCRIPTION (Must Be Unclassified)		REFERRER TO	DATE	RECEIVED BY
Draft-10CFR60 Provisions relating to "anticipated & unanticipated processes and events"		J. T. Greeves	10/22	
		T. Jungling		
ENCLOSURES ACTION CLOSED TELEPHONEICALLY 10/18/85 DISCUSSION WITH Lyn Ballou, LLNL.				
REMARKS				

U. S. NUCLEAR REGULATORY COMMISSION

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FORM NRC 326
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