

March 12, 1999

Mr. John L. Russell
Director
Center for Nuclear Waste Regulatory Analyses
Washington Office
12300 Twinbrook Parkway
Rockville, Maryland 20852-1606

**SUBJECT: PROGRAMMATIC AND TECHNICAL REVIEW OF INTERMEDIATE MILESTONE
REPORT 1293-001-820, ASSESSMENT OF THE U.S. DEPARTMENT OF
ENERGY GENERAL METHODOLOGY FOR WASTE CLASSIFICATION AT
SAVANNAH RIVER SITE HIGH-LEVEL WASTE TANK FARMS**

Dear Mr. Russell:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the subject report, submitted as final, and does not consider it to be acceptable in its present state. A number of open items have been identified in this report, and only limited conclusions have been made with respect to some issues. For example, the report's discussion of waste classification Criterion 3 does not address three of the four performance objectives of 10 CFR 61 Subpart C or make a general conclusion regarding compliance with the criterion. The staff's desire is that the report reach conclusions regarding the acceptability of the U.S. Department of Energy at Savannah River (DOE-SR) methodology for each criterion, and for the entire "incidental" waste classification methodology. If such conclusions can not be reached due to open items, then the issues need to be addressed satisfactorily before a final report is written. For the foregoing reasons, in its current form, this report is not suitable for attachment to a Commission paper and/or letter to DOE-SR. *b*

Staff recognizes that some issues remain to be resolved. Accordingly, the staff is planning to meet with Center for Nuclear Waste Regulatory Analyses staff and DOE-SR staff and contractors to gather more information. Following this meeting, we would like to develop a plan for preparation of a background information document for an eventual Commission paper on the DOE-SR methodology. *104 7
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Please contact me at (301) 415-5874 if you have any questions regarding this letter.

Sincerely,

/s/

B. Jennifer Davis, Materials Engineer
Engineering and Material Section
Engineering and Geosciences Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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