

MAY 5 1988

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Dr. Nestor R. Ortiz, Acting Supervisor  
 Waste Management Systems  
 Division 6416  
 Sandia National Laboratories  
 Albuquerque, NM 87185

Dear Dr. Ortiz:

SUBJECT: COMMENTS ON SNL'S MARCH 1988 MONTHLY REPORT FOR FIN A-1165

I have received SNL's March 1988 monthly report for FIN A-1165 and have six comments to make:

- (1) First, I would like to draw your attention to my first two comments on SNL's February 1988 monthly report, transmitted to you in a letter dated May 4, 1988. Obviously, these comments would not yet have been addressed in the March 1988 monthly report. Further problems of a similar nature do, however, appear in the March report. For example, why has \$15K been charged to Task 3 when no activity is recorded under this Task? Also, why has \$7K been charged to Task 4, when the activity report suggests that only \$5K should have been charged to this Task? Such charges should be explained.
- (2) The monthly report indicated that an extension of the due dates for all deliverables under FIN A-1165 is necessary. At our project review meeting of April 6-7, 1988, SNL requested that all due dates, with the exception of the subtask 1.1 interim report, be extended by three months. I can agree in principle to the request to extend due dates on the deliverables, insofar as the work will still be completed in FY89. However, an across-the-board extension of three months for each deliverable may not meet the needs of the NRC. I plan to discuss this at our program review scheduled for May 17-18, 1988, and would like to come to an agreement on a mutually acceptable set of revised due dates for all of the deliverables at this time.
- (3) It was suggested in the monthly report that two letter reports required under FIN A-1165 would be repetitious of material being provided in other reports to be delivered under this contract. The two letter reports are part of subtasks 1.3 and 2.6 and are entitled, respectively, "Modeling efforts needed to support a HLW repository license application" and "The use of expert judgement to estimate data and parameter uncertainty". I agree that the material that was to be presented in these two letter reports will be repetitious of certain chapters to be provided in the subtask 1.1 and 2.3 reports on parameters and components for licensing

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assessment, and on the elicitation and use of expert judgement in dealing with uncertainty in HLW repository performance assessments. Therefore, I would like to inform you that I will be initiating paperwork to amend the Statement of Work (SOW) by deleting these two letter reports.

- (4) I acknowledge timely receipt of the subtask 1.1 interim report, entitled "Components of an overall licensing assessment methodology", in a separate mailing from the monthly report. NRC staff, lead by P. Brooks, is currently reviewing this report; I hope to be able to provide you with comments by mid-May 1988. I have not identified any major problems in my initial review of this report, and consider, on this basis, that it will most likely be appropriate for you to address any comments during preparation of the final formal report required under this subtask.
- (5) Under subtask 2.1 on recommended techniques for assessing compliance with the EPA's HLW repository containment requirements, it is suggested in the monthly report that the paper published in Science by J. Campbell and R. Cranwell will serve as a basis for the required formal report. I am concerned that this paper does not provide an adequate or sufficient basis for this subtask. It would be more appropriate to consider NUREG/CR-4510, "Assessing Compliance with the EPA High-Level Waste Standard: an Overview" (Hunter et al., 1986) as a starting point for completion of this subtask (refer to the SOW).
- (6) Finally, in the discussion under Task 4, you listed six efforts that will not be accomplished in FY88 owing to the transfer of funds from Task 4 to Task 5. The first three of these were (a) quality assurance and installation of the Dosimetry and Health Effects code, (b) correction of errors identified in SWIFT II, and related activities, and (c) generalization and integration of the code coupler programs. Could you please provide separate cost estimates for completing each of these three efforts.

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The action taken by this letter is considered to be within the scope of the current contract (FIN A-1165). No changes to cost or delivery of contracted products are authorized. Please notify me immediately if you believe this letter would result in a change to the cost or delivery of contracted products.

Sincerely,

Daniel A. Galson, Project Manager  
Operations Branch  
Division of High-Level Waste Management  
Office of Nuclear Material Safety  
and Safeguards

cc: P. Davis, Division 6416, SNL  
E. Bonano, Division 6416, SNL  
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