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John Reuss, Deputy Chief
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U.S. Bureau of Mines
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SUBJECT: COMMENTS ON THE METHODOLOGY REPORT DRAFT OUTLINE, MILESTONE 1, TASK ORDER 003, INTERAGENCY AGREEMENT NRC-02-85-004

Following are my comments and recommendations on the subject document received on January 29, 1986. I have tried to apply the principles discussed during our meeting on February 12, 1986 and transmitted to you on February 20, 1986. The emphasis of my recommendations is toward a refocusing of the purpose and objective of the report to meet NRC's regulatory responsibility.

1) Section 1 should be entitled something like: Regulatory Basis for Evaluating Natural Resources in the Candidate Area for a High-Level Nuclear Waste (HLW) Repository.

The regulations directly applicable to natural resources are: 10 CFR Part 60.21(c)(13), and 10 CFR Part 60.122(c)(17),(18),(19),and (20).

There should be several paragraphs explaining the relationship of this report to the regulations. I have made some attempt to arrange the following items in some logical order of presentation, however, it is not necessary that they be presented in this order. Rather, I intend that the items listed stimulate thought. They are intended to provide guidance and, although it may occur, they should not be strictly adhered to and parrotted back to me.

a) NRC's responsibility is to make a finding that the Department of Energy (DOE) has adequately demonstrated compliance with the regulations.

b) This document is intended to provide guidance to DOE on acceptable methods for demonstrating compliance with the regulations.

c) The results of data acquisition may contain significant uncertainty with regard to natural resources because exploration for natural resources is not a primary goal of site characterization investigations.

d) Data acquired during site characterization can serve to augment existing models of natural resources potential based on literature and data base searches.

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e) Natural resources encountered during site characterization may also be addressed by the use of subjective probability resource estimation methods applicable to evaluating undiscovered resources.

The objective of Section 1 is to orient the reader to the regulatory nature of the HLW program, discuss the limitations on natural resource assessment imposed by the HLW program, and focus the reader to the task at hand. I think that if we accomplish this, we not only help the reader, but it will focus the task for us, and the remainder of the report will be easier to complete.

2) Section 2.1.3 should be renumbered 2.2 and entitled something like "Identify and prioritize areas of similar size to the site that are representative of and are within the geologic setting". The application of the term "geologic setting", in addition to that in 10 CFR Part 60.2, Definitions, is that area around a site within which natural resource exploitation could affect the ability of the geologic repository to isolate waste (See 10 CFR Part 60.21(c)(13)). Section 2.2 is a principle emphasis of the report and, subsequently, is a large section. It should describe a method or methods for comparing natural resource potential of a hypothetical site with other similarly sized sites within the geologic setting. This should be accomplished by utilizing the information obtained during Sections 2.1.1 and 2.1.2 above.

3) Because the emphasis of the report is on comparison of sites based on literature and existing data base searches, there should be a new Section 2.1.4 that describes methods for developing models from literature and data base searches.

4) Sections 2.2 through 2.4 should be abridged into a brief Section 2.3 (probably not to exceed a couple of pages in the final report) that briefly describes the kinds of analyses or surveys DOE may wish to consider when conducting site investigations.

5) As discussed in the February 12 meeting, Sections 2.7.3 through 2.7.7 should be moved to follow Section 2.6.1.

6) Section 2.1.4 should be moved to Section 2.6 or 2.7 but should certainly proceed Section 2.8.

7) Section 3 should be deleted and replaced by an application of the information developed in Section 2 to the regulations discussed in Section 1. The information contained in the existing Section 3 should be incorporated into the discussions of various methods in earlier sections (i.e. see item 2 above).

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These comments are sufficiently extensive to require the development of a revised outline reflecting the format changes I have recommended. Following receipt of these comments, you should contact both Don Bleiwas and Nick Wetzel to determine that they understand how they are to implement these recommendations. I suggest that at that time I come to your office to participate in a telephone conference call to assure my instructions are understood. At that time, we can discuss your estimates regarding the amount of additional time needed to implement these recommendations.

The action taken by this letter is considered to be within the scope of the current contract (NRC-02-85-004). No change to costs or delivery of contracted products are authorized. Please notify me immediately if you believe this letter would result in changes to costs or delivery of contract products.

/S/

Richard Lee, Project Officer
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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