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January 23, 1986
Contract NRC-02-85-008
Fin. No. D-1020
Communication No. 22

Mr. Jeff Pohle
Division of Waste Management
Mail Stop SS-623
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

WM-885
WM Docket File
D1020
WFA

WM Project 10,11,16
Docket No. _____
PDR ✓
LPDR B, N, S

Distribution:
x Pohle _____
(Return to WM, 623-SS) _____ *WFA*

RE: SALT

Dear Jeff:

We have examined the list of issues from each of the three salt sites; our comments follow. An up-to-date list of all salt related documents currently in our library is enclosed also. This letter and enclosed document list constitute the report requested in Subtask 3.1 of the Statement of Work for Contract NRC-02-85-005. The comments are based on issues as presented in Exhibits 5, 6, and 7 of the same contract. We have elected to treat all three exhibits as one basic issue set and refer to specific sites only when individual issues are different or when specific comment is merited.

The issue concept has presented a problem in the past; the review of these issues renews consideration of this problem. The way in which the issues are structured often causes a formal assessment or response to the issue to be repetitive and of somewhat limited value. The issues are intended to cover every possible factor that may have some bearing on the characterization and performance of a given waste repository. This objective is commendable; however, this goal could be achieved without formalizing every possible factor as a separate issue or sub-issue. It would be more workable technically to have several issues which define a framework and then to have lists of parameters or data that the NRC deems essential to adequate resolution of those several issues. The manner in which the issues currently are presented encourages splitting of parameter/data needs into progressively narrower categories. The attempt to define data needs more closely is not undesirable, but to place each of these needs in a separate formal framework makes

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ultimate evaluation and response more difficult and time consuming.

An example of the tendency to narrow these data needs and to create additional issues is provided when issue 1.1.2 of the bedded salt sites is compared with the same issue of the dome site. In each of the bedded salt site's issue 1.1.2.3 contains reference to the effect on groundwater flow "by structural, stratigraphic and lithologic discontinuities and heterogeneities." In Exhibit 7 this single issue becomes two separate issues: issue 1.1.2.3, which deals with "structural discontinuities", and issue 1.1.2.4, which covers "stratigraphic and lithologic discontinuities and heterogeneities". The reason for splitting this issue into two issues for the salt domes is not immediately clear. Presumably it reflects the idea that structures associated with a salt dome potentially may be of greater significance on groundwater than structures associated with a bedded salt deposit. Whether this is correct or not is subject to debate; however, it seems to us that regardless of the relative importance of structural discontinuities on groundwater flow at each of the proposed sites, the subject will receive the appropriate level of technical scrutiny regardless of whether it is combined with other factors in a single issue or is presented as a separate one. The disadvantage of having many separate issues is that when formal evaluation of issues is required a series of highly repetitive responses often results. The repetitive nature of these responses results because of the close similarity among individual issues and because unique data sets which allow independent evaluation of each issue often are unavailable. Such repetitive responses consume large amounts of time and provide little additional information on the status of characterization activities.

In addition to the general comment presented above we also have the following specific comments regarding issues.

1. Issue 1.1.1.2 addresses the characterization of the hydrogeologic system of "the geologic setting." This issue raises a question regarding the definition of geologic setting. Geologic setting is a somewhat ambiguous term which can be taken to mean many things. In our opinion the issue would be less likely to produce confusion if the phrase "of the geologic setting" were deleted. We do not believe that removal of this phrase would lessen the significance of the issue in any way because it already specifies characterization of "the hydrogeologic system."
2. Issue 1.1.2.7 asks for the "3-dimensional distribution of hydrogeologic data within the local groundwater flow system." Evaluation of the data base used for site characterization is

very important; however, it is questionable whether data distribution is really an issue. The real issue is whether or not the flow system is characterized adequately, not how data are distributed. We believe that this statement should not be listed as an issue.

3. Issue 1.5 asks for future effects on "groundwater flowpaths, velocities, fluxes and discharge rates." Earlier issues refer to defining present-day flow paths and discharge rates but no specific mention is made of determining present-day groundwater velocities or fluxes. If future changes in fluxes and velocities are significant, and if the approach to be taken in the issues is to define all possible parameters which may be important to characterization, then knowledge of present-day groundwater velocities and fluxes should be a specific issue.

With the exception of the comments noted above, it is our opinion that the issues as stated in Exhibits 5, 6, and 7, adequately delineate the information needed to evaluate site characterization and performance. We believe the issues might be reorganized in a more workable form; but we find no major problems or deficiencies in the issues as they are presented.

Sincerely,

Jeffrey C. Brown
Jeffrey C. Brown

JCB:sl

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