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WM-10(2)  
WM-11(2)  
WM-16(2)

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Hydrogeology • Mineral Resources Waste Management • Geological Engineering • Mine Hydrology

Enc. to In  
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January 15, 1987  
Contract No. NRC-02-85-008  
Fin No. D-1020  
Communication No. 107

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

WM-RES  
WM Record File  
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WM Project 10, 11, 16  
Docket No. \_\_\_\_\_  
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LPDR B, N, S } and

Distribution:  
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Dear Jeff:

This letter constitutes a request that you elevate the NRC document review process to the status of a singularly budgeted task in future technical assistance contracts. My reason behind this request is as follows.

The DOE and its contractors have prepared and continue to prepare a steady string of technical documents that are designed to characterize each of the three high-level sites. In the case of our contract I refer exclusively to technical reports and papers on hydrogeology. The ultimate objective of the documents is to lay the ground work for a position on groundwater travel time and on radionuclide release rates relative to the EPA standard. I am appending to this letter a list of the documents that we have for the three sites. As a part of our technological assistance obligation under our contract, I have pursued a policy of reviewing as many of these technical documents as possible as time permits. The documents that we have reviewed are designated on the attached list. My reason for attaching the list is to put the issue in perspective. My objective is to illustrate the problem that the NRC will face if these technical reports and papers are not reviewed steadily on a day-by-day basis. Clearly the reports and papers on the list, as well as subsequent reports and papers, will constitute the basis for any decisions that are made with respect to site characterization and ultimately the selection of a site for the application for a construction permit. Any position that the NRC ultimately takes with respect to an application for a construction permit will have to be based on approval or disapproval of the subject technical reports and papers prepared by DOE and its contractors. It will be utterly impossible for the NRC to digest the large number of technical documents at the time of the submission of an application for a permit. It is essential that the NRC team be cognizant of the evolution of the technical reports and papers as they are prepared. The NRC cannot afford to wait for a milestone such as the SCP or a construction permit before reviewing the technical reports and documents. We already have encountered somewhat of a problem of this nature. When we reviewed the draft EA's and the final EA's we

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found that we had somewhat of a backlog of unreviewed papers that were used as a technical basis for assertions contained in the EA's. The backlog was not very large; consequently we were able to overcome the problem by an intensified effort. But the EA's were prepared and presented early in the site characterization program. Documents are accumulating now at a much faster rate than they were before the preparation of the EA's by the DOE. This is particularly true of the Palo Duro Basin and the Nevada Test Site.

I believe it is important that the Repository Programs Branch be aware of this problem also. Consequently I am sending a copy of this letter and a copy of the attached list to John Linehan for his perusal. Because I consider this to be a very important activity with respect to the future effectiveness of the NRC licensing activities, I suggest that it would be beneficial for you to discuss this matter with John or one of his staff members so that the issue can be placed in proper perspective in the RP Branch.

I thank you for considering my suggestion.

Sincerely,



Roy E. Williams  
Ph.D. Hydrogeology  
Registered in Idaho

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cc: John Linehan