



United States Department of the Interior

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Denver Research Center
Ground Control Division

December 14, 1984

Mr. David Tiktinsky
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Division of Waste Management
Office of Nuclear Material Safety & Safeguards
Nuclear Regulatory Commission
1920 Norfolk Avenue
Bethesda, Maryland 20814

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WM Record File
B-6934
BOM

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

Distribution:

TIKTINSKY

(Return to WM, 623-SS)

Dear Dave:

Enclosed are review comments on the document entitled "U.S. Nuclear Regulatory Commission Draft Generic Technical Position on Design Information Needs in the Site Characterization Plan (SCP)".

If we can provide further assistance for this document review, please phone me at FTS 776-0741 or Matt DeMarco at FTS 776-0745.

Sincerely,

R. L. Mundell
Group Supervisor
Mine Design

Enclosure

cc: Harry R. Nicholls, Wash. Office
cc: Earl B. Amey, Wash. Office
Richard H. Oitto, Denver Office
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December 14, 1984

Review Comments

U.S. Nuclear Regulatory Commission Draft Generic Technical Position
on Design Information Needs in the Site Characterization Plan (SCP)

<u>Section</u>	<u>Comment</u>
3.3	Information is requested in this section regarding the material comprising the engineered barrier system. Similar information should be requested for exploratory shaft and borehole seals, which are not engineered barrier systems as defined in IO CFR 60.2.
3.4	The SCP should include a description of borehole and shaft seal design <u>evaluation plans</u> ; developing the evaluation plans will be difficult.
3.5	This section states that performance criteria are needed for the engineered barriers prior to developing testing and characterization plans. A similar approach should be taken for the exploratory shaft and borehole sealing program.
3.6	The first paragraph indicates that the proposed design must establish <u>how much</u> information is needed. <u>What types</u> of information should also be addressed. The <u>second</u> paragraph is vague. It is difficult to determine what is required for the alternative design concepts. This entire section could immediately precede section 3.0.
3.7	Can the uncertainties be adequately defined for the parameters examined in the sensitivity analysis and parametric study? The degree of confidence to characterize design parameters should be addressed in the SCP.
General	The technical position is written in a non-committal tone. The document is difficult to read and understand; this makes the technical position of the NRC unclear concerning the information and level of detail required in the SCP.