

NUCLEAR WASTE CONSULTANTS INC.

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December 14, 1988

009/5/NWC.014  
RS-NMS-85-009  
Communication No. 296

U.S. Nuclear Regulatory Commission  
High-Level Waste Management  
Technical Review Branch  
OWFN - 4H3  
Washington, DC 20555

Attention: Mr. Jeff Pohle, Project Officer  
Technical Assistance in Hydrogeology - Project B (RS-NMS-85-009)

Re: Task 5: Topical Report on GWTT

Dear Mr. Pohle:

Nuclear Waste Consultants (NWC) is in receipt of your letter of November 18, 1988, assigning NWC to prepare a topical report assessing "technical uncertainties" associated with implementing 10 CFR 60.113(a)(2), the performance objective for groundwater travel time (GWTT). The topical report is to be prepared under Task 5 of the current contract, NRC-02-85-009.

I regret the delay in responding to the letter, which was not received at NWC until November 28. At that time, the NWC Project Manager was on family leave in North Carolina and did not return until December 7. Unfortunately, in his absence, the staff did not identify the issue, and it was not brought to my attention again until December 12.

Mr. Brown and I now have reviewed the letter and the attached Task Description developed by Mr. Ross and the Hydrologic Transport Section. As is well known by the Staff, we concur with the need for and the timeliness of such a product. We consider the Task Description to be generally very well written and exceptionally clear. In particular, we consider the statement of scope for the task to be fully adequate, and we can see no need for expenditure of federal funds to develop a "final scope". That is, we are pleased to accept the statement in the Task Description as the scope for the assignment.

We do, however, have major reservations about the schedule that is included in the task description and in your letter. The nature of the work to be performed is such that we consider - and we believe that the Staff agrees - that several hundred NWC staff hours over a period of perhaps six months will be required to produce the final product. As you and all of the NRC Staff are fully (even painfully) aware, the GWTT performance objective has been enormously contentious, both technically and institutionally, for the better part of a decade. In light of past history and the need to develop technically sound bases to evaluate and choose between several fundamentally different approaches (as outlined in the statement of scope in the Task Description) only a major commitment of resources - of both time and technical effort - seems likely to be at all productive.

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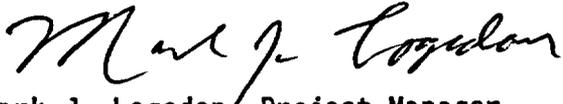
We consider, and conversations with NRC Staff confirm, that the schedule presented is an artifact of the current period of performance for Contract NRC-02-85-009, which is due to expire on January 16, 1989. The required product cannot possibly be developed on that schedule (see NWC Monthly Status Reports for June 1988 - November 1988). Instead of the schedule proposed in the Task Description, NWC proposes the following alternative schedule:

- o Detailed outline - January 16, 1989
- o Draft Topical Report - March 1, 1989
- o Staff review of the Draft - March 31, 1989
- o Response to Staff Comments - May 1, 1989
- o Final Topical Report - June 1, 1989.

Clearly, this schedule is incompatible with the current period of performance for NRC-02-85-009. Therefore, NWC proposes that there be a no-cost extension of the period of performance for the current contract. As of November 30, 1988, there remained \$282,876 in the committed funding for the contract, more than enough to complete the topical report. Contract NRC-02-85-009 allows up to three one-year extensions at the Government's option, of which the NRC has exercised only 1 so far. Thus, particularly since there will be no overall impact to cost to the Government, we consider that a no-cost extension is the appropriate manner in which to provide continued support to the Staff. Without an extension, the product cannot be fairly begun, much less completed. In light of the schedule proposed above, we respectfully recommend that the contract be modified to extend the period of performance to close-of-business on June 1, 1989.

If you have any questions about this letter, please contact me immediately.

Respectfully submitted,  
NUCLEAR WASTE CONSULTANTS, INC.



Mark J. Logsdon, Project Manager

Att

cc: US NRC - Director, NMSS (ATTN PSB)  
HLWM (ATTN Division Director)  
Edna Knox, Contract Administrator  
HLGP (ATTN Branch Chief)  
D. Chery, HLGP  
F. Ross, HLGP

bc: L. Davis, WWL