



United States Department of the Interior

BUREAU OF MINES

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June 10, 1988

To: Charlotte Abrams, Project Officer, Geotechnical Branch,
Division of Waste Management, U.S. Nuclear Regulatory
Commission, Washington, DC

From: Chief, Branch of Engineering and Economic Analysis

Subject: Review of NRC Generic Technical Position--Guidance for
Determination of Anticipated Processes and Events and
Unanticipated Processes and Events, Work Directive-016,
Task Order 002, under Interagency Agreement NRC-02-85-004

NRC FIN D 1018

Pursuant to Work Directive-016, Task Order 002, under Interagency Agreement NRC-02-85-004, the subject document was reviewed by the Western Field Operations Center. Enclosed are six copies of the review comments.


Robert D. Weldin

Enclosure

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Review Comments

Generic Technical Position Guidance for Determination of Anticipated Processes and Events and Unanticipated Processes and Events

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The draft Generic Technical Position (GTP) entitled "Guidance for Determination of Anticipated Processes and Events and Unanticipated Processes and Events" was reviewed by the Western Field Operations Center, Spokane, WA. Comments pertaining to the GTP are listed below:

- The NRC is commended for its rejection of the proposed probabilistic approach for classifying processes and events as anticipated or unanticipated. The Bureau of Mines concurs with the NRC's rationale for rejecting the approach.

- Last paragraph, p. 6 through first paragraph, p. 7. ". . . the program of exploration, assumed in the analysis, should be based on a comparison of drilling histories of similar deposits." The meaning of this sentence is unclear.