



# United States Department of the Interior

GEOLOGICAL SURVEY  
RESTON, VA 22092

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AMERICA

In Reply Refer To:  
WGS-Mail Stop 423  
ER 88/904

Mr. John J. Linehan, Acting Chief,  
Project Management and Quality Assurance Branch  
Division of High-Level Waste Management, MS-4-H-3  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Re: Draft Technical Position on Postclosure Seals in an Unsaturated Medium -  
Federal Register Notice September 30, 1988 (38393)

Dear Mr. Linehan:

We have reviewed the subject technical position paper and offer the following comments for your consideration:

Because deterioration and disintegration of seals over time must be anticipated, consideration should be given to emplacing swelling clays at strategic locations above the seals. Performance of any clay to be emplaced should be evaluated at maximum prevailing temperatures prior to use. The lower portions of boreholes that reach the water table but do not penetrate the repository might be used as part of a drainage system to cope with the problem of diverting water working downward in the unsaturated rock surrounding the facility.

Sincerely,

for James F. Devine  
Assistant Director  
for Engineering Geology

Copy to: Director, Office of Environmental Project Review, DOI

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