

MAR 17 1989

R8/R9 MEETING

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Dr. Wesley Patrick
Center for Nuclear Waste
Regulatory Analyses
Post Office Drawer 28510
6220 Culebra Road
San Antonio, TX 78284

Dear Dr. Patrick:

SUBJECT: MEETING ON R8 AND R9 HELD ON MARCH 17, 1989

Robert Johnson, of the Repository Licensing and Quality Assurance Directorate, and I met with Dr. Ruth Weiner of your staff today to discuss the Draft Analysis of Regulatory Uncertainties Related to the Site Characterization Plan and the Exploratory Shaft Facility (R9). We also discussed a preliminary draft of the Analysis and Evaluation of Regulatory Uncertainties in 10CFR60 Subparts B and E (R8). I am transmitting our major comments on R9 to you via this letter.

Regarding R9, the following changes are required for the final report to be acceptable to NRC.

1. To reduce repetition and redundancy in Appendix B, only state the uncertainties related to 10CFR60 122(c) once. In the Uncertainty Notes section do not include any material below section 1.1.
2. Include an expanded Purpose section in the Introduction which speaks to the NRC request and the CNWRA response (and modify the Purpose section of the Executive Summary accordingly).
3. Throughout the report, differentiate clearly between the uncertainties that should be addressed in the Site Characterization Plan (SCP) review and those that can be addressed later in site characterization. In the meeting, this was recognized as the difference between objections/Exploratory Shaft Facility (ESF) comments and other comments.
4. You should review all of the correlations between uncertainties and ESF attributes, particularly uncertainties with 10 CFR60.131(b).
5. Reword your recommendations as conclusions.
6. Eliminate duplicative tables (Dr. Weiner can provide you with specifics).

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7. Explain the combinations used in the tables.

As we discussed with Dr. Weiner, we expect that any applicable comments will also be considered in the development of R8.

If you have any questions regarding the content of this letter, please contact me.

Sincerely,

LSI

Mark S. Delligatti, Program Element Manager
Special Projects and Analytical Evaluations/
Transportation Program Element
Engineering Branch
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

cc: MMace
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