

R8 RESPONSE

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NOV 16 1988

Mr. John Latz, President  
Center for Nuclear Waste  
Regulatory Analyses  
P.O. Drawer 28510  
6220 Culebra Road  
San Antonio, TX 78284

Dear Mr. Latz:

We have received the draft outline for WSE&I Milestone R8, "Recommendations for Regulatory Actions Resulting from Analysis of 10 CFR 60." You have proposed an approach in which the CNWRA lists actions available to NRC to resolve regulatory uncertainties. The approach involves the CNWRA judging the difficulty NRC would have in applying the various regulatory options presented. This may not be the most effective way to present this information to NRC decision makers.

I strongly suggest that you consider presenting your findings to NRC as the results of attribute analyses of both the uncertainty and the resolution. This method provides for the evaluation of the uncertainties in relation to the attributes (significance, timing, etc.). This kind of uncertainties analysis also allows for determination of which attribute(s) should be maximized for each recommended uncertainty method. Once presented with this type of analysis, NRC can then pick the most appropriate regulatory option. This is essentially the same logic the CNWRA would be required to go through in order to recommend a specific regulatory approach. The only difference is to document the logic and stop there.

I call your attention to the requirement that analyses provided by the CNWRA include a rank ordering of relevant attributes (Attachment 4 of the contract).

We will be prepared to discuss this with you during our visit to San Antonio the week on November 28, 1988.

Sincerely,

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Joseph O. Bunting, Chief  
Engineering Branch  
CNWRA Program Manager  
Division of High-Level Waste Management  
Office of Nuclear Material Safety  
and Safeguards

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