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9-25-87

Mr. James Knight
Director
Licensing and Regulatory Division
Office of Geologic Repositories
U.S. Department of Energy
RW-20
Washington, DC 20585

Dear Mr. Knight:

We are forwarding a copy of a recent letter we received from a DOE contractor or subcontractor working in QA for the repository program. The letter contained several questions pertaining to QA and the transportation and safeguards of high-level waste. We believe it is more appropriate that DOE contractor questions be handled within or through DOE.

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B. J. Youngblood, Chief
Operations Branch
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure:
As stated

87295210
WM Project: WM-1
PDR w/encl
(Return to WM, 623-SS)

WM Record File: 405
LPDR w/encl

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8905240477 870925
PDR WASTE PDR
WM-1

9-2-87

DEAR MR CRUTCHFIELD,

AFTER HAVING RECEIVED SUCH A FINE RESPONSE TO MY PREVIOUS CONCERN REGARDING WOLF CREEK GENERATING STATION, I FELT COMPELLED TO ASK YOU TO POSSIBLY SUPPLY THE ANSWER TO ANOTHER CONCERN OF MINE. SHOULD YOUR OFFICE NOT BE ABLE TO SUPPLY THE ANSWER, THEN I WOULD APPRECIATE YOU GIVING THIS LETTER OR ITS CONTENTS TO THE APPROPRIATE PARTY(IES).

I AM PRESENTLY WORKING AS A QA REPRESENTATIVE FOR A COMPANY PERFORMING THE DESIGN OF A HIGH LEVEL RADIOACTIVE WASTE REPOSITORY. SOME QUESTIONS COME TO MY MIND REGARDING HOW QA LEVEL I, II, III APPLY IN RESPECT TO ALL THE VARIOUS CODES & STANDARDS USED WHEN DESIGNING & CONSTRUCTING NUCLEAR POWER PLANTS VERSUS A GEOLOGIC REPOSITORY. FOR EXAMPLE, THE WATER & WASTE WATER SYSTEM HAS BEEN DESIGNATED QA LEVEL I. FROM READING 10CFR 50.34, I'M WONDERING IF THE REPOSITORY COULD BE CLASSIFIED AS A "CONTAINMENT" STRUCTURE AND IF SO, WOULD THE PIPING SYSTEMS REQUIRE COMPLIANCE WITH ANSI B31.1 OR ASME SECTION III? WOULD THE HVAC^{SYSTEM} REQUIRE COMPLIANCE WITH AWS D9.1 FOR WELDED SUPPORTS, AWS D9.3 FOR DUCTWORK, ETC?

MY MAIN QUESTION IS HOW TO RELATE THE QA LEVELS TO THE APPLICABLE CODES AND FEDERAL REGULATIONS - ANY SUGGESTIONS?

ONE LAST QUESTION -

10CFR 60.21.4 STATES THAT NO DETAILED INFORMATION NEED BE SUBMITTED ON PROTECTION AGAINST THEFT OR DIVERSION SINCE RADIATION HAZARDS ASSOCIATED WITH HL WASTES

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MAKE THEM INHERENTLY UNATTRACTIVE AS A TARGET FOR THEFT OR DIVERSION. GRANTED, ONCE THE WASTE PACKAGE ARRIVES AT THE REPOSITORY AND IS EMPLACED IN ITS FINAL RESTING PLACE, THEFT OF THAT WASTE PACKAGE WOULD BE NEXT TO IMPOSSIBLE. HOWEVER, WHILE THE PACKAGE IS IN TRANSIT FROM THE MONITORED RETRIEVAL STORAGE FACILITY TO THE REPOSITORY WOULD BE A PRIME TIME FOR ANTI-NUCLEAR GROUPS OR TERRORISTS TO DIVERT IT TO A PUBLIC WATER SUPPLY OR OTHER HEALTH & SAFETY HAZARD AREA. DOES 10CFR 20.21.4 ONLY COVER THE REPOSITORY SECURITY PLAN AND DOES SOME OTHER REGULATION APPLY TO TRANSPORTATION OF THE PACKAGES?

I WILL BE LOOKING FORWARD TO HEARING FROM YOU AND THANKS IN ADVANCE.

SINCERELY,

Paul Hale
12912 E. 24th ST
TULSA, OK 74134

9-25-87

OFFICIAL CONCURRENCE AND DISTRIBUTION RECORD

LETTER TO: Mr. James Knight
 Director
 Licensing and Regulatory Division
 Office of Geologic Repositories
 U.S. Department of Energy
 RW-20
 Washington, DC 20585

FROM: B. Joe Youngblood, Chief
 HLOB/NMSS

SUBJECT: FORWARDING A COPY OF A RECENT LETTER WE RECEIVED FROM A DOE
 CONTRACTOR OR SUBCONTRACTOR WORKING IN QA FOR THE REPOSITORY
 PROGRAM

DATE:

DISTRIBUTION

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CONCURRENCES

ORGANIZATION/CONCUREE	INITIALS	DATE CONCURRED
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