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Washington, D.C. 20585

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WM Project

Docket No.

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SEP 3 1985

Mr. Robert E. Browning
Director
Division of Waste Management
Mail Stop 623-SS
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Browning:

As you know, the Nuclear Waste Policy Act of 1982 (Act) mandates that the Department begin to accept waste for disposal by January 31, 1998. The Department is firmly committed to meeting this date and has structured its program accordingly.

An important element of the overall planning is to put into place a process whereby the Nuclear Regulatory Commission (NRC), working in concert with the Department, receives the information it needs to meet the schedules mandated by the Act. Over the past few months, we have been working closely with you and your staff to more clearly define these information needs. As a result, it is our expectation that a number of steps will be put into place by the Office of Civilian Radioactive Waste Management (OCRWM) to keep the Commission fully informed, during the prelicensing period, of the Department's activities and programs leading to the submission of a License Application (IA) for a geologic repository. Further, this program for rapid and complete transfer of information will continue throughout the IA process. Specifically, the OCRWM's Office of Geologic Repositories (OGR) will continue and/or put into place the following interactions with the Commission and other parties:

1. Prelicensing Consultations

The OGR will continue to meet regularly with the NRC staff in a free and open exchange to present its plans and program for site characterization, repository design, Environmental Impact Statement (EIS) and IA development, and data collection and interpretation. These meetings will be arranged and scheduled so that the NRC staff will have ample opportunity to review the material prior to the meetings, and scheduled sufficiently early in the process, so that the staff's advice can be considered and incorporated into the activity.

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Recently, the OGR and NRC staffs met to develop a schedule for joint meetings on the repository program. The meetings encompassed a broad range of topics, from those with management orientation to topics strictly technical in content. In all, 30 meetings were identified between June and December 1985. Later this fall, we expect to meet again with the NRC staff to identify additional topics that would be scheduled next calendar year. In particular, the OGR will meet with the NRC staff in the next three to six months to describe specific activities planned and milestones from now through submittal of the IA. This will provide a detailed and systematic basis for determining and agreeing upon what are appropriate points for consultation between the two agencies.

2. Licensing Information System

For the past several months the OCRWM has had under development a computer based licensing information system. This system will be designed to capture virtually the entire span of activities which relate to the repository program and the licensing process. We have had two meetings on this system with the NRC staff and believe we understand your position on the critical elements of such a system. Basically, we plan to put into place a system which will provide you and others with on-line full text access to the extent possible, for retrieval of program documents. This includes correspondence, internal memos, reports, issue tracking and other appropriate records. We will continue to work with your staff in developing the system. It is our belief that this system will not only provide your staff with current and complete records of the program but also serve as a vehicle to support the licensing process. In particular, we believe the system that we plan to adopt will ensure rapid turnaround and complete recovery of appropriate program documents during the discovery process.

3. Quality Assurance Plans and Activities

We have developed a quality assurance program for both the OCRWM's Headquarters organization and the Project Offices. Substantial progress has been made in implementing these programs. We met with the NRC staff in November 1984, to provide a briefing on the status of the quality assurance programs at Headquarters and in each project. In December 1984, representatives from NRC's Division of Waste.

Management and Office of Inspection and Enforcement visited each of DOE's three first-repository projects and received a briefing on each project's quality assurance program. In addition, NRC personnel attended DOE Headquarters' audits of the Tuff and Basalt projects during March and May 1985, and the Salt project audit in July 1985.

In turn, DOE Headquarters and each of the projects have been briefed by NRC on the lessons learned from nuclear power plant quality assurance experience as set forth in NUREG-1055, "Improving Quality and the Assurance of Quality in the Design and Construction of Nuclear Power Plants."

As you know, a final quality assurance plan has been issued by the OGR. In addition, quality assurance plans have also been issued by the Nevada Nuclear Waste Storage Investigations project (NNWSI) and the Basalt Waste Isolation Project (BWIP). The Salt Repository Project Office (SRPO) has issued a draft quality assurance plan; following incorporation of OGR comments a final plan will be issued. NRC has been provided with copies of the HQ plan and also all project plans. OGR and the projects are now developing procedures to implement these plans and to have a fully qualified program in place prior to submittal of the SCPs. We will request NRC to audit our program so that we might demonstrate compliance with the QA requirements.

4. Environmental Impact Statement

The Nuclear Waste Policy Act requires that the Department's Environmental Impact Statement (EIS), used in selection of the repository site, be adopted to the extent practicable by the Commission in connection with the issuance of a construction authorization and license for the repository. The OGR is presently developing a conceptual plan for the preparation of the EIS. We will discuss this plan with you before it is finalized. Further, we expect to invite NRC to participate, as a cooperating Agency, in the preparation of the EIS and to consult with the staff as the EIS is being developed. We hope that the NRC will agree to become a cooperating agency in order to facilitate the development of an EIS that can be adopted by NRC. We expect that our initial meeting with the staff will be scheduled within the next few months.

5. States, Affected Indian Tribes, and Outside Parties

The OCRWM is committed to an open program where data and information pertaining to the sites is readily available. In this regard, we expect to continue our efforts of involving the States and affected Indian Tribes in our program activities including meetings with the Nuclear Regulatory Commission such as described in item 1 above. Further, it is our plan that the States and affected Indian Tribes will have an opportunity, if they so desire, to access our licensing information system. In all meetings with the NRC staff, we will provide review materials pertaining to the meetings in a timely manner as agreed to in the DOE/NRC Management meeting of May 30, 1985. In regard to outside parties, the OGR plans to address and to the extent possible, resolve concerns, both technical and institutional, that we are able to identify, prior to issuance of the IA.

These steps, along with others to be identified in future discussions with you, will greatly facilitate the Commission's participation and understanding of the repository program during the next six years prior to submittal of a Licensing Application. Accordingly, at the time of the Department's submittal of the License Application, we anticipate that the Commission will be fully prepared to act upon the Application in a manner consistent with considerations of the public health and safety, and hopefully, as discussed in our mission plan.

I am fully committed to continue to work with your office and would welcome the opportunity to discuss any of the above items with you, as well as any additional activities which might help enhance the process.

Sincerely,



William J. Purcell
Associate Director
for Geologic Repositories
Office of Civilian Radioactive
Waste Management

ACTIONS

MISSION PLAN TESTIMONY
by - Commissioners
- Dircks

July 26, 1985
Sept. 12, 1985
Nov. 6, 1985
Oct. 30, 1985

Comment Letter on Draft PDS

Oct. 24, 1985

Various Meetings with DOE.

QA
Management Meetings
License Info.

[Moxian question on 1998]

FROM DOE		DATE OF DOCUMENT 9/3/85		DATE RECEIVED 9/16/85		NO WM-85821	
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DESCRIPTION (Must Be Unclassified)		REFERRER TO		DATE		RECEIVED BY	
NHPA mandate that DOE begin to accept waste for disposal by January 31, 1998		HJMiller		9/16		for appropriate action	
ENCLOSURES		ACTION NECESSARY <input checked="" type="checkbox"/>		CONCURRENCE <input type="checkbox"/>		DATE ANSWERED	
REMARKS		NO ACTION NECESSARY <input type="checkbox"/>		COMMENT <input type="checkbox"/>		BY 9/30	
<p><i>Actions closing tickets</i></p> <p><i>(12/11/85)</i></p> <p><i>1. mission Plan Testimony by Commissioners & Dick</i></p> <p><i>9/26/85 - 9/12/85 - 11/6/85 - 10/30/85.</i></p> <p><i>2. Comment letter on Draft PDS - 10/24/85</i></p> <p><i>3. Various mtgs w/ DOE.</i></p>							