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MEMORANDUM FOR: John G. Davis, Director
Office of Nuclear Material Safety
and Safeguards

FROM: Robert E. Browning, Director
Division of Waste Management

SUBJECT: BENEFITS OF DOE/NRC EARLY INTERACTIONS

This memo is in response to your January 21, 1986 note requesting information on the benefits of early interaction between NRC and DOE.

We have defined a positive benefit as the following:

A positive benefit is maintaining an up to date knowledge of DOE programs and activities allowing early identification of potential licensing issues or licensing information needs which allow initiation of activities leading to timely issue resolution and a complete license application.

We have sent a copy of this to DOE but have yet to receive any comments back from DOE as to whether or not they agree. When we receive comments from DOE, we will get back with you.

Original Signed by
MICHAEL J. BELL

for Robert E. Browning, Director
Division of Waste Management

Enclosure:
Results of DOE/NRC Early Interactions

WM Record File <u>109</u>	WM Project <u>111</u>
	Docket No. _____
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RESULTS OF DOE/NRC EARLY INTERACTIONS

A positive benefit is maintaining an up to date knowledge of DOE programs and activities allowing early identification of potential licensing issues or licensing information needs which allow initiation of activities leading to timely issue resolution and a complete license application.

POSITIVE BENEFITS WITH EXAMPLES

- 1) Enable NRC to maintain up to date knowledge of DOE program and activities so that NRC is up to speed and ready to comment knowledgeably and effectively on DOE reports and activities or meet with DOE within time frames requested by DOE
 - Review of Draft EAs within 90 day comment period requested by DOE
 - Meeting on Contents of SCP, 10/85
- 2) Early identification of potential licensing issues during the pre-licensing period, so that DOE can consider NRC comments in planning stages.
 - NNWSI core logging procedure letter: during site visit identified lack of documented procedures to control storage and handling of core.
 - NNWSI and SRP waste package meetings: identified concerns with current material selected and the need to consider alternative materials.
 - Draft EA review comments
 - BWIP SCP review comments
- 3) Progress towards early resolution of potential licensing issues including the identification of areas of agreement or disagreement, and issues that are "ripe" for resolution.
 - Palo Duro basin structural/tectonics meeting: reached agreement that current data permit a range of structural geology interpretations.
 - NRC STP on BWIP hydrology testing: identified need for determining that the existing data is adequate to define baseline prior to disturbing the site through shaft construction or hydrologic stress testing.
 - Seismo-tectonics meeting

- 4) DOE and NRC identifying and jointly agreeing where guidance is needed.
 - Salt waste package meeting
 - NNWSI Exploratory Shaft design meeting
 - NRC STP on BWIP hydrology testing: agreed on logic for testing including decision and consultation points
- 5) Access and exposure to new data, information, and draft plans which indicate how DOE interprets data and how DOE is progressing in a given program area, both of which give NRC an opportunity to give DOE early feedback during the planning stages before plans or activities are fixed.
 - BWIP hydrology meeting: identified that drilling with mud might preclude the ability to obtain hydrologic data such as permeability.
 - data reviews
 - Appendix 7 visits: identification of data not aware of previously
- 6) NRC giving early guidance to DOE in developmental stage of major program documents before plans or activities are fixed.
 - SCP annotated outline meeting
 - Seismo-tectonics meeting
 - Salt Performance Assessment Plan comment letter
 - SCP chapter 8 guidance meeting and comment letter
 - Performance allocation meeting
- 7) Participation by affected States and Indian tribes, and others in pre-licensing consultation with DOE provides an opportunity for identifying issues early in the licensing process so that they can be considered by NRC and DOE and resolved in a timely fashion.
 - Retrievability meeting
 - NNWSI Geochemistry meeting
- 8) Identify potential site characterization activities that might compromise the performance of the site or preclude the acquisition of adequate information for licensing.
 - BWIP hydrology testing meeting
 - Exploratory shaft concern letters
- 9) NRC giving major guidance on specific program areas to help assure that major areas of the program are functioning in place when needed.
 - QA program interactions leading to implementation of QA programs prior to start of site characterization
 - Licensing information retrieval system interactions

10) Opportunity to give DOE and NRC management timely feedback on how the program is progressing.

- NRC-DOE management meetings
- BWIP hydrology testing meeting

All of the above-mentioned efforts are still underway as steps in the issue resolution process, and will continue through the pre-licensing period and final issue resolution. As site characterization progresses and more data and information become available NRC/DOE interactions will focus on development of technical positions which will allow substantial progress toward issue resolution.