



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

89001297

APR 1 1991

MEMORANDUM FOR: B. J. Youngblood, Director
Division of High-Level Waste Management

THRU: John J. Linehan, Deputy Director *JJL*
Division of High-Level Waste Management

FROM: Ronald L. Ballard, Chief
Geosciences & Systems Performance Branch
Division of High-Level Waste Management

Joseph O. Bunting, Chief
Engineering Branch
Division of High-Level Waste Management

Joseph J. Holonich, Acting Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management

SUBJECT: REPORT ON UNCERTAINTY REDUCTION

Enclosed is the task team report, "Systematic Regulatory Analysis Regulatory and Institutional Uncertainty Reduction Recommendations." The task team reviewed the regulatory and institutional uncertainties identified by the Center for Nuclear Waste Regulatory Analyses (CNWRA) in CNWRA 90-003, "Identification and Evaluation of Regulatory and Institutional Uncertainties in 10 CFR Part 60," and by the staff in SECY-90-207, "First Update of the Regulatory Strategy and Schedules for the High-Level Waste Repository Program," and has recommended techniques for reducing the 49 uncertainties considered. The majority of the work required to reduce the identified uncertainties will be carried out as part of presently budgeted activities. The exceptions would be those items for which the recommended reduction approach involves minor rule changes or, in some cases, where further analysis has been recommended. The staff found many of the uncertainties to be of a minor nature and it is the staff's belief that these uncertainties are addressed in the Draft Regulatory Guide DG-3003, "Format and Content for the License Application for the High-Level Waste Repository" (FCRG) or can be addressed in the final version of the FCRG or in the License Application Review Plan.

A major open issue between the staff and the CNWRA concerning a group of uncertainties related to the adverse conditions of 10 CFR 60.122 has been identified. The staff believes that the requirements of 10 CFR 60.122 are to be considered in relation to the performance objectives (e.g., 10 CFR 60.112 and 10 CFR 60.113). The CNWRA staff has proposed a different interpretation of the rule. Therefore, these uncertainties have been placed in the "further analysis" category pending discussions on April 25, 1991 between the CNWRA and NRC management and staff to attempt to resolve the issue. We will report to you after that meeting on the final recommended resolution of those uncertainties.

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The need for this task was identified to the Commission in SECY-90-207 in June, 1990. At that time the staff proposed a two part effort to resolve existing identified regulatory and institutional uncertainties. The first part was an effort to select the appropriate reduction methods. The attached report completes and documents that activity. The second part, which the staff presented as its initial view, was to prepare a single staff position to resolve most of the uncertainties that would not be reduced by ongoing or planned rulemakings or that were not significant enough to warrant a special staff position. However, as documented in the enclosed report, the staff concluded that no staff positions were needed at this time. The staff will inform the Commission of the status of this activity in its next update to SECY-90-207 which is scheduled for June 1991.


If you need further information on this report, please contact Philip M. Altomare, the task team leader.



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Enclosure: As stated

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