

109.10

JUN 21 1984

MEMORANDUM FOR: Recipients of Executive Summary--  
 High Level Waste Oversight Committee

FROM: Michael J. Bell, Chairman  
 High Level Waste Oversight Committee

SUBJECT: PAGE CHANGE TO EXECUTIVE SUMMARY

Enclosed please find a revised page I-5 for the above report. This change is being made because the previous version inadvertently implied that the NRC staff had not given attention to the integrity of the NRC regulatory program, and that was not the intent. Please replace this page in your copy of the report.

Original Signed by  
 MICHAEL J. BELL

Michael J. Bell, Chairman  
 High Level Waste Oversight Committee

Enclosure:  
 Revised Page I-5

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the Committee's review and deliberations. Volume 2 will contain more details and set forth the basis for Volume 1. We divided our principal recommendations into two categories:

- A. Technical;
- B. Management and Administration.

#### A. Technical

We conclude that technical programs exist within NRC to permit independent audits of DOE submittals. However, they must be strengthened in the following ways:

##### 1. Model and Code Development and Validation for Compliance Assessment

An independent method of calculating the performance of a site is needed in order to provide the desired credibility to NRC licensing decisions. Some work is underway, but the analysis and modeling are outrunning field and laboratory experimental work. More attention needs to be given to uncertainty analyses in the modeling and to identifying data needs for both model and code validation. We see no impediment to the use of DOE data provided data collection is conducted according to sound principles of quality assurance and quality control; the task is so difficult and resource intensive that the taxpayer should not pay twice unless absolutely necessary. However, NRC should specify, and soon, its further needs in this area, giving careful attention to the question of independence, i.e., of ensuring NRC's regulatory integrity to carry out licensing. A research review group should be established for assessing the HLW model and code development and validation activities of NRC. The group should include both NRC personnel and contractors.

##### 2. Near-Field Effects

We noted that most of the compliance assessment modeling effort tended to focus on the far-field effects. Yet we believe that more attention should be given to validated modeling of storage, retention, and controlled release of