

101.1/RW/85/06/20

WM Record File 101.5

WM Project 10

- 1 -

Docket No. _____

JUN 25 1985

PDR

LPDR

NOTE TO: John Linehan
FROM: Robert J. *RJW*

Distribution: _____

(Return to WM, 623-SS)

SUBJECT: OBSERVATIONS ON REVIEWS OF THE BWIP DRAFT EA BY OTHER AGENCIES

The BWIP team has reviewed the EA comments prepared by:

- A State of Washington
- State of Washington - Revised
- B Yakima Indian Nation
- C Environmental Protection Agency
- D Department of Interior
- E Edison Electric Power Institute

Attached is a hand-written tabulation, "Other Agencies Review of the Hanford EA". It lists comments that differ significantly from ours in substance or supporting evidence. The tabulation was considered by the BWIP team on June 19. In the right hand margin I indicate the team's view of each comment, especially as to whether the matter should have been included in the NRC comments.

In summary, the team noted no comment that we missed and that should have been included in our EA comments. Two comments draw on supporting evidence we do not have, and we will follow-up on these: #12, page 3 and #4, page 4.

The environmental comments by the Yakima Nation represent a special matter. They call into question D. G. Rice's two studies of 1984, which provide the main basis for DOE's findings. They assert that "religious or sacred sites" are present. They call for a reversal of DOE's findings on disqualifying condition 960.5-2-5 (d)(1); qualifying condition 960.5-2-5 (a); and favorable condition 960.5-2-5 (c)(2). The Yakima Nation comments reflect access to tribal knowledge that is outside the contents of the EA and not available to our reviewers. Our comment 4-3 on archaeological surveys points out that the draft EA omits reference to consultation activities.

Attachment: Other Agencies Review of the Hanford EA

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PDR WASTE
WM-10 PDR

Other agencies review of the Hanford EA

11/13

①

(A)

State of Washington EA Review

1.) lateral extent of Buzz candidate repository horizon may not be large enough due to possibility of defense wastes as stated in NWPA (section 86) J. Buckley

Beyond our rec

2.) Comment 3.3.2.3 (D)

Borehole wall spalling binding the drill bit. Too detail J. Buckley

3.) Comment 3.3.2.3 (E)

Contingency plans for sealing a partially completed shaft. J. Buckley

Too detail for inclusion in our comm

4.) Comment 3.4.3.2(A)

Construction methods and technology not available to control a reduction in isolation capability following waste emplacement. J. Buckley

Question? maybe

5) p. 7 of Summary letter: "There is no separate section or chapter in the Hanford draft EA dealing specifically with defense wastes."

Beyond our

K Chang

Washington (Cont)

6) p. 13 ... The ~~at~~ discussion under "Hydrocarbon ^{Disturbance} Intrusion; Natural Gas" may not be discussed in the same context as in NRC's hearing. (The Materials Group of WMEG did not provide a comment in this area. Therefore I would rather defer this to the Geologists.)
- K Chang

7) p. 6-10 Comment 6.2.1.2(c) This has not been addressed in NRC's Comments ^{with} (damaged rock and disturbed rock zone as part of ^{of} waste package)
K Chang

8) p. 4 - WA says feds don't have water rights ^{or} for repos. characterization ^{Out}
M. Gordon

9) p. 6-19 - The use of a high value of eff. ^{thick} thickness is misinterpreted as a ^{use of} conservative assumption. M. Gordon

10) p. 3-72 - state note that hydrochem data is in conflict with DOE assume of downward grad at ~~well~~ ^{Base} _{provided}
M. Gordon

Washington (Cont.)

11) A comparison is made with Hanford's 1982 Site Characterization Report. One significant point not raised by NRC in our D.E.A. comments is that since 1982 little new data has been presented "in spite of continued field and laboratory work (p. 9)

K Westbrook

Interesting
of Brewster's
Outside our
scope

12) It is stated that "recent" and presumably active faulting has been discovered at the eastern end of Yaking Ridge. No basis for this statement is made and no references given. I will check with Bill Brewster about this, it is news to me unless its based on fault activity evidenced by earthquakes

K Westbrook

No basis given
for this
Westbrook will
follow up

Yakima Indians EA Review

- ① p. 6-32 Comment # 6-65 on QA procedures
QA comments have not been included
in NRC Review. K Chang Outside
our scope
- ② p. 6-95 Comment # 6-64 (settling parameters of
disturbed rock-affect on radionuclide transport) K Chang
- ③ p. 6-99 Comment # 6-74
(performance of the total isolation system) K Chang
Not in EA
- ④ p. 6-34 YIN note several Fenwick + Wilson reports that we are not aware of and should obtain. M Gordon We will follow up
- ⑤ p. 6-36 YIN note strong interconnection seen between two flow tops at one of the cluster holes. We did not note this in our comments. M Gordon Agree will not include in our review
- ⑥ p. 6-48ff YIN reviewed the "probability encoding method" papers. We have not done so. Gordon's general message
- ⑦ p. 6-91 YIN note that MAGNUM-MC + POKMC codes yield different results for same problem. M Gordon Gordon says that codes are not benchmarked, i.e. same message.

EA review that codes are not benchmarked, i.e. same message.

EPA EA REVIEW

1) EA page G-222 to 226

"The discussion of potential on-site radiological hazards under normal conditions is inadequate"

Beyond our scope

Our comments on worker exposure were eliminated by project management as permit

Bliley

2) EA page G-59

The Hanford Reach of the Columbia River under consideration as a Wild and Scenic River and the "potential conflict" was not discussed in the EA.

We considered the Wild and Scenic River consideration for the Hanford Reach of the Columbia but do not consider the RRL a "potential conflict."

We do not agree with EPA

Bliley

We agree with EPA that the subject should have been discussed in the EA, we do not agree that there is a potential conflict with the same and Wild River Act

3

In the cover letter, tectonic activity is listed as a factor unlikely to have a significant effect on waste isolation and should not have equal status with such critical factors as geohydrology and geochemistry.

We question this conclusion

4

In the general comments (p. 2) Natural Resources is said to merit special emphasis for post-closure along with Geohydrology, Geochemistry, and Rock Characteristics

5

Under p. 1 of Hanford Site comments, EPA states that the DEA should discuss the effect of Mt. St. Helens.

We agree

6/7

Under p. 12 of Hanford Site comments, EPA points out that DOE's conclusion that earthquakes larger than historical seismicity will not occur on the Columbia Plateau appears to question NRC conclusions (presumably regarding 6.5 magnitude along RAW).

7

DOE should discuss stratigraphy below basal

Info. limited to geochemical results

8

DOE should perform a more detailed water balance for the Pasco Basin to determine contribution of ground-water to Columbia

Current opinion is that info. is too limited to do this for

(D)

Interior EA Review

Review of USGS comments on BWP DEA

USGS Comment

The fracture zone in the Unit. at
KLL-2 should not be assumed to
be a localized feature

Category

(A)

This is covered in our
EA, but in general
terms.

(E)

EEI EA Review

There have been no comment by the BWIP Team on EEI's review of the Hanford EA.