

EDISON ELECTRIC INSTITUTE

The association of electric companies

1111 19th Street, N.W.
Washington, D.C. 20036
Tel: (202) 828-7400

JOHN J. KEARNEY, Senior Vice President

September 17, 1984

Hubert J. Miller
Chief, Repository Projects Branch
Division of Waste Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

WM Record File

101.6

WM Project

Docket No.

PDR

LPDR

Distribution:

H Miller

M Gordon

M Logsdon

B Wright

(Return to WM, 623-SS)

CZ

Re: Notice of Availability; NRC BWIP Site Technical
Position 1.1: Hydrologic Testing Strategy for
the Basalt Isolation Project (49 Fed. Reg. 28,951)

Dear Mr. Miller:

These comments are submitted on behalf of the Edison Electric Institute (EEI) and Utility Nuclear Waste Management Group (UNWMG) in response to the above-referenced notice. We have reviewed "Site Technical Position No. 1.1: Hydrologic Testing Strategy for the Basalt Waste Isolation Project" (BWIP STP) and believe that it presents a generally sound program of hydrogeologic testing for the Hanford site. Further, as a general comment, we strongly support timely NRC guidance to DOE as the repository program develops and proceeds toward licensing.

In the purpose section of the BWIP STP the NRC Staff notes that:

In light of the current levels of uncertainty about the groundwater flow system and of the dynamic nature of the site characterization process, the NRC Staff considers that the guidance should provide an 'envelope' of approaches broad enough to help guide the detailed decisions that must be made in the future by the DOE.

Further, on page twelve in the conclusion, the Staff observes:

The hydraulic testing strategy which is described in this document is not necessarily the only approach which would lead to an acceptable hydraulic data base and performance assessment; nor is it intended to be a blueprint for the DOE or its contractors.

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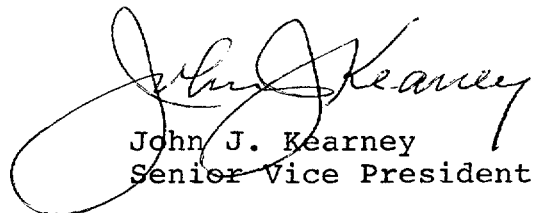
However, the method of arriving at a testing strategy for site characterization is intended to be representative of the type of strategy expected prior to license application.

EEI/UNWMG agree fully with these statements, but are of the view that the existence of other, potentially acceptable programs should be further emphasized.

It might be possible, for example, if strong evidence of certain conceptual models emerged, to reduce the pump test program presented in the BWIP STP. This type of possibility should be specifically noted and its potential acceptability further emphasized. Such clarification would help avoid any residual confusion over the nature of the guidance provided in the BWIP STP, and could facilitate substantial savings in time and expenditures. // ?

We appreciate the opportunity to review the BWIP STP and, in addition to the points discussed above, offer three relatively minor, detailed comments in the Enclosure hereto.

Sincerely yours,


John J. Kearney
Senior Vice President

JJK:jhd
Enclosure

DETAILED COMMENTS ON BWIP SITE TECHNICAL
POSITION NO. 1.1: HYDROLOGIC TESTING STRATEGY
FOR THE BASALT WASTE ISOLATION PROJECT

- p. 8 - Constraint number 4 states that "The time schedule of NWPA must be adhered to, to the extent practicable." This "constraint" is, unlike the others listed, statutorily imposed and should be further emphasized. This may be done by changing the word "practicable" to "possible."
- p. 9 - The descriptive words "Reference Repository Location" should be inserted before the abbreviation "RRL" in the third-to-last line, and the initials "RRL," themselves, should be placed in the parentheses.
- p. 10 - The reference to "Section 2.1.4" in the fourth full paragraph should be changed to "Sections 2.1.4 and 2.1.5."