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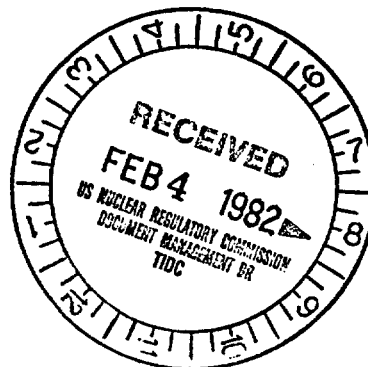
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Dr. Frank E. Coffman
Deputy Assistant Secretary for
Nuclear Waste Management
U.S. Department of Energy
Mail Stop B-107
Washington, D.C. 20545



Dear Dr. Coffman:

Thank you for your letter of January 6, 1982 responding to matters we had raised in several recent discussions and letters from me to Sheldon Meyers dated December 1 and December 15, 1981.

In those letters we stressed the need to: (1) identify early what are the potential major issues in licensing of the high level waste repository; and (2) reach early agreement on the programs of site characterization and technical development that should be conducted to be able to adequately evaluate and resolve these issues in licensing. The interest of such efforts is to settle prelicensing questions as early as possible to assure they are not put off to a time when they might disrupt DOE programs and schedules. This is important because most of the technical concerns raised in previous letters, such as hydrology testing, are complex and involved. They will take some time to work out and it is for the reason that we have raised them with a sense of urgency about working expeditiously to resolve them.

Your letter responded favorably to the request in my December 15, 1981 letter for an early meeting between our organization, the Richland DOE Field Office and Rockwell to review issues of hydrology and hydrology testing at Hanford. It further conveyed your interest in establishing procedures to guide continuing direct interaction between cognizant NRC staff and the Field Office and noted that our staffs are working on revisions to the formal Procedural Agreement between our agencies to this end.

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The requested meeting on Hanford hydrology was held during the week of January 10, 1982 and significant progress was made in sorting out and getting conceptual agreement on virtually all important issues discussed. We believe that this meeting worked well toward a common understanding of site characterization needs at the Hanford project. Continued discussions between our staffs, the Field Office and Rockwell are needed and are progressing on the other technical issue referred to in your letter (viz., in-situ stress in basalts at Hanford), as well as on the continuing issue of hydrology testing and other issues to be raised in the Site Characterization Report (SCR). Our staffs are working together and will next meet on February 2, 1981 to formalize the arrangements for continued direct contact with the Field Office. I consider this is a matter that you and I, should both follow closely to assure there is no disruption in continued technical exchange with DOE personnel preparing the Hanford SCR.

You noted in your letter that the degree to which procedures for geotechnical investigations can be standardized is limited, given the complexity and diversity of conditions encountered in geologic and hydrologic studies. We agree with this point; it is the chief reason for developing individual site characterization programs and site specific SCR's which recognize the conditions and issues that are unique to each site. However, the point of my December 1, 1981 letter is that these are at least several, defineable technical areas where it would be most efficient and appropriate to develop a common or standardized approach to testing and data gathering. The work of the Materials Characterization Center (MCC) and Materials Review Board (MRB) is the example used in my letter of an effective way to get wide agreement on questions of testing and data quality in the waste form and package area. Other areas where similar efforts appear warranted include geochemistry data gathering and shaft and borehole seal testing. You may be able to identify additional areas where such efforts would be beneficial.

I have been urging that some action be taken to expand efforts like those of the MCC-MRB for quite some time and our staffs have been working together to find specific mechanisms for doing this. Little progress has been made, however. I would again urge that you give this careful consideration so that at the next meeting between our staffs on this matter (February 2, 1982), some specific mechanisms for building consensus on the testing and data gathering issues can be identified.

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Again thank you for your letter. I would be pleased to discuss the above points with you further at your convenience.

John B. Martin, Director
Division of Waste Management

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