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Mr. W. Wade Ballard, Jr.  
Acting Director  
Division of Waste Repository Deployment  
and Remedial Action  
Office of Nuclear Energy  
U.S. Department of Energy  
NE-330  
Washington, DC 20545

Dear Mr. Ballard:

This is in response to your letter of July 15, 1982 addressed to John Martin. The letter transmitted comments by Rockwell, dated May 19, 1982, on an NRC draft report comparing groundwater modeling efforts of Pacific Northwest Laboratory and Rockwell.

First, it should be noted that the draft NRC report is an internal working document, the purpose of which is to highlight areas where additional data gathering and analyses are needed at the BWIP. There was no intent to publish this as an external report. This is consistent with our policy of identifying potential issues at an early time so these can be addressed on a schedule that avoids delay. The document was provided to Rockwell, upon request, as part of our ongoing effort to have an exchange of information, and discussion, on site characterization issues.

We have reviewed Rockwell's evaluation and comments of May 19. A main concern, similar to that of our draft report is that "boundary conditions for the Pasco Basin are not a known quantity" (page 4, paragraph 2). Further, the ultimate sentence (page 5) expresses a view that is entirely consistent with the purpose of our report, as discussed above: "The differences in the preliminary models have served as a useful catalyst in focusing upon important areas of uncertainty." While there are some useful clarifications in the Rockwell document, the comments are not complete and clear enough to completely understand the concerns that are raised. Furthermore, some of the comments are based on information not available to the NRC staff.

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I suggest that questions as complicated as these can, practically speaking, only be sorted out through direct technical communication. This confirms the usefulness of the informal technical interactions, such as workshops, that are under way at the BWIP.

During the June 1982 workshop on in situ testing, we were provided with an undated review, by Rockwell's Siting Department, of another internal NRC working paper. This paper evaluates geochemical data as it provides insight to groundwater flow paths in the Pasco Basin. The paper was developed by NRC in the same manner and with the same purpose as the model studies comparison. We have found that the draft paper is useful in focusing discussions with Rockwell and expect to continue mutual evaluation of these matters through the workshops.

Sincerely,  
"ORIGINAL SIGNED BY"  
Hubert J. Miller, Chief  
High-Level Waste Technical  
Development Branch  
Division of Waste Management

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