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NUCLEAR REGULATORY COMMISSION
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SEP 20 1984

MEMORANDUM FOR: Robert E. Browning, Director
Division of Waste Management

FROM: Tilak R. Verma, Senior On-Site
Licensing Representative

SUBJECT: SRP SITE REPORT FOR THE WEEKS OF
SEPTEMBER 4, 1984 THROUGH SEPTEMBER 17, 1984

1. Have been reviewing Chapter 6 (5th Draft) of the seven EAs being prepared by the Salt Repository Project Office. This chapter deals with the evaluation of a proposed site relative to the Guidelines. The Guidelines are divided into two major groups: those that require site characterization, and those that do not require site characterization. The Guidelines further consist of sets of System Guidelines, each of which has a corresponding group of Technical Guidelines. The Guidelines include "qualifying conditions," "disqualifying conditions," "favorable conditions," and "potentially adverse conditions." In this chapter each System Guideline follows its corresponding Technical Guideline. Evidence (data) from the Technical Guideline is used in the System Guideline directly and/or in performance assessments used to support the System Guideline. This chapter is of great significance to the NRC staff, primarily due to the fact that the data have been used either directly or indirectly to support the analysis and evaluations of the application of the Guidelines. Numerous assumptions (often being called conservative assumptions) have been used to support the analysis. Though there is a mention of uncertainties in the data, there are hardly any discussions about the type of uncertainty and no efforts are made to quantify these uncertainties. Details about the performance assessment models that are used for each of the System Guidelines are not provided. Analytical results such as 771,000 years of groundwater travel time are given without any qualifying of the data that are used in the models.

It should also be noted that there is no mention of quality assurance in discussions of the data used throughout the chapter.

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R. Browning
Page 2

2. Have been making preparations for a field trip to the Permian Basin.

Tilak R. Verma
Tilak R. Verma
Senior On-Site
Licensing Representative
Salt Repository Project

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cc: M. Bell
J. Bunting
H. Miller
M. Knapp
L. Barrett
J. Linehan
R. Johnson
R. Cook
P. Prestholt
N. Numark