

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

OCT 1 8 1984

MEMORANDUM FOR: Robert E. Browning, Director

Division of Waste Management

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FROM:

Tilak R. Verma, Senior On-Site Licensing Representative Salt Repository Project (SRP) CENTER OPT 22

SUBJECT:

SRP SITE REPORT FOR THE WEEK

OF OCTOBER 15, 1984

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- I have learned from Neff that DOE is in the process of mailing 5th draft of EAs to the states, affected Indian Tribes, NRC and to some other Federal agencies. Draft 5 is quite different from draft 4; however, it is being revised and it is far from being final. I have seen some chapters from draft 6 and find some significant changes that have been made.
- 2. I have read the statement by DOE before the Udall Committee on October 12, 1984 in Salt Lake City, Utah. In my opinion there are two or three areas which call for a response from the Division. DOE claims that preliminary working drafts were provided to states and Federal agencies for review and to receive input. NRC had not reviewed any of the preliminary working drafts and never intended to provide any input.

In responding to Question 2 from the Committee, DOE claims that extensive state-of-the-art hydrologic testing were conducted on all DOE boreholes. In my opinion the hydrologic testing done at the GD No. 1 borehole was in a 'drill and test' mode and results from this type of testing are considered rough estimates at best. Also, the techniques used by DOE could not be considered state-of-the-art by the technical community. Our hydro team has reviewed some of the hydrologic testing data from GD No. 1 borehole.

In responding to Question No. 5 from the Committee, DOE claimed to have a formal Quality Assurance Program which meets the NRC requirements as well as Quality Assurance Program requirements for nuclear facilities published by the ANSI in conjunction with the ASME. NRC has not audited DOE's QA program. I attended several of DOE/ONWI QA audits as an observer. As I mentioned to you earlier, DOE's peer reviews are ineffective and serve no useful purpose.

Filax R. Verma

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