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STATE OF UTAH

SCOTT M. MATHESON
GOVERNOR

OFFICE OF THE GOVERNOR
SALT LAKE CITY

84114

January 4, 1985

John Linehan, Section Leader
Nuclear Regulatory Commission
Salt Project Section
Repository Projects Branch
Division of Waste Management
Office of Nuclear Material Safety & Safeguards
Washington, D.C. 20555

Dear Mr. Linehan:

In October of this year, the State Geologist of the Utah Geologic and Mineral Survey (UGMS) released a document titled Geologic Issues, High Level Nuclear Waste/Paradox Basin, which was presented or forwarded to you and your staff. This document reflected some of the general geologic concerns that the state has on the repository siting activity conducted by DOE. At that time, the state agreed to transmit to you copies of our complete geologic review along with reviews of the other major technical issues when completed.

Specifically, the Geohydrologic Technical Review Group, coordinated through the Utah High Level Nuclear Waste Program, consists of a number of the State Division of Oil, Gas and Mining hydrologists and geologists, a representative of UGMS, and a number of university and private geologic and geohydrologic consultants for the state. This group has conducted extensive review of DOE geologic and geohydrologic studies and evaluated the testing completed (and lacking) and the manner in which DOE has applied the data for site nomination. This group can be considered well informed of the types of data which will be used in the Environmental Assessments for Davis and Lavender Canyons. A number of critical issues have been raised by the group which are addressed in the attached geologic issues paper compilation of state review of the working drafts for the Environmental Assessments.

Among these is the importance of a multiple barrier system (which includes geology, the canisters, and the engineered repository itself) for containing the radionuclide wastes for the 10,000 year duration required by the EPA rules. The importance of the geologic barriers should not be overemphasized. The issues papers note the importance of an interactive multiple barrier system.

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Please find enclosed the Geologic and Geohydrologic Issue Summaries prepared by the Geohydrologic Technical Review Group which reflect the technical deficiencies in data application of the DOE program, and the issues papers for the other areas of technical review. I hope these documents will offer insight into the position that Governor Matheson has taken on these critical issues.

Sincerely, .



Judith Hinchman
High Level Nuclear Waste Program Manager

JH:SJK:rmn

enc.

cc: Genevieve Atwood, UGMS w/encs.

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