Ths 62 55 See pocket 12 for enel abert & Drowning WM DOCKET CONTROL CENTER \$2 BEPARTMENT OF ENERGY AUG 27, 5, DEPARTMENT OF ENERGY OF CIVIL FAN RADIOACTIVE WASTE MANAGEMENT CFFICE_UF-CEOLOGIC REFOSITORIES CHANGE CONTROL FOARD UDruary 27-1965-FROM: M. P. Hanson, Secretary 10: Change Control Board Members (By Facsimile) W. J. Purcell J. W. Bennett S. A. Mann J. O. Neff U. L. Olson. D. L. Vieth COFIES TO: Change Control Board Ad Hoc Members (by mail) R. Stein WM Record File WM Project E. S. Burton Dockel No. Additional Copies (by mail) PDR_ Distribution J. R. Hilley R. W. Gale M. W. Frei (Relurn to WM, 623-SS) C. E. Brocks Flim: C. Cook - NRE A conference call was held on Friday, Feb 15, 1985, in which your representative was consulted about two changes to the Generic Requirements for a Mined Geologic Disposal System (OGR/B-2) , BCF B-100 and BCP B-101, which you have already evaluated. 'In an attempt to resolve your previous comments, new changes were proposed during the conference call. These new changes and revised justifications are being distributed for your further evaluation by this memorandum. Please obtain a Baseline Change Proposal Evaluation Sheet from the OGR Frogram Baseline Procedures Handbook and return a Completed evaluation for each change by March 14, 1985. Please telecopy your evaluation to: Martin P. Hanson ROY F. WESTON, INC 2301 Research Blvd, 3rd Floor Rockville, MD, 20850 Telecopyi (301) 840-1552 Confirmation: (301) 963-6800 Telephonei (301) 963-6826 . 8610140150 850227 PDR WASTE WM-10

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PROGRAM *			
February 27, 1985 7 350 101 101			
DATE	SHEETOF		
BCP NUMBER B. 100			
DOCUMENT NUMBER OGR/3-2 REVISION			
DOCUMENT TITLE Generic Requirements for a noss			
ADDITION OF DOCUMENT	· CHANGE BASELINED DOCUMENT		
DESCRIPTION AND JUSTIFICATION FOR PROPOSED CHANGE: Modify the definition of Engineered Barrier System to include a portion of the host rock in the system where appropriate.			
The NRC has specified a performance objective for the engineered barrier system in 60.113(a)(1)(ii)(B). In most cases, the Project Offices have planned to meet this release rate criterion within the waste package. However, the proposed change provides flexibility to the Project Offices to incorporate a portion of the host rock in the definitions of "underground facility" and "engineered barrier system". However, where the host rock is incorporated into the definition of engineered barrier system for purposes of meeting the release rate criterion, the Project Offices will need to demonstrate the ability to characterize the host rock under anticipated conditions and to predict performance over the period of performance (10,000, years) in order to support a finding of reasonable assurance of compliance by the NRC. This may necessitate inclusion of coupled effects testing in the Site Characterization Plan and the Exploratory Shaft Test Plan.			
THER BASELINE DOCUMENTS AFFECTED:			
None None			
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DETAILS OF IMPACT	COST IMPACT SCHEDULE IMPACT		
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Definition Change	Paper work None		
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GEOLOG	IC REPOSITORY DEPLOYMENT		
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DESCRIPTION AND JUSTIFICATION FOR PROPOSED CHANGE: Change the performance criterion on Engineered Barrier System (Postclosure) to be applicable to the waste backer, and change the performance criterion related to excluding radionuclide releases at a , eless than 0.1 percent of the calculated total release rate to a rate less than 1 part in 100,000,000. The first change is intended to serve as a goal for waste package design and performance assessment efforts in the near-term. The change is aimed to assure uniformity among the projects in their activities related to the NRC release rate performance objective. This change, coupled with BCP B-100, provides wach project the opportunity, if needed, to conduct a tradeoff analysis of either modifying the waste package design to assure compliance with the release rate performance objective or moving the boundary for compliance with the performance criterion back cut to the engineered barrier system while taking credit for a portion of the host rock within that system. Changing the boundary for complying with the release rate performance objective back out to the engineered barrier system would require further change control action. The second change improves the clarity of the performance objective, consistent with discussions in the draft EA's. OTHERSASELINE DOCUMENTS AFFECTED:			
DETAILS OF IMPACT ACTIVITY/ITEM AFFECTED	COSTIMPACT	SCHEDULE IMPACT	
Definition Change	Paper Change	Nona	
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2.2.1 HASTE PACKAGE Fostclosure

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" The emplaced waste form, container, any other packing, and absorbant raterials immediately surrounding an individual wasta container, ""

FUNCTIONAL REQUIREMENTS:

- 1. To contain the radionuclides for a specified period of time.
- 2. To contribute to controlling the release of radionuclides after the containment period.

PERFORMANCE CRITERIA:

- The wasta package system shall be designed, assuming anticipated processes and events, so that containment of radioactive wasta will be substantially complete for a period not less than 300 years after permanent closure of the geologic repository. Specific numeric criteria for "substantially complete" and the time period for containment depend on site-specific characteristics (10 CFR 60.113(a)(1)(ii)(A) and 60.113(b)).
- 2. The specific performance criteric for controlling the teleder of radronuclichas from the maste pickage will be raise specific diteringtion.

2. The waste package system shall be designed, assuming anticipated processes and events, so that the total release rate of any radionuclide from all of the waste packages* after the containment period shall not exceed (a) 1 part in 100,000 per year of the inventory of that radionuclide calculated to be present at 1000 years after permanent closure or (b) 1 part in 100,000,000 per year of the total inventory of radionuclides calculated to be present at 1000 years after permanent closure. The total release rate is to be calculated based on the total population of waste packages, and not for an individual waste package.

*The engineered barrier system performance objective of 10CFR60.113 is being applied to the waste package As a goal for design and performance assessment purposes at this time.



PERFORMANCE CRITERIA:

- 1. A Assuming anticipated processes and events, the release rate of any radionuclide from the engineered barrier system, excluding phaft and borehole seals, following the containment period shall not exceed 1 part in 100,000 per year of the inventory of that radionuclide calculated to be present at 1,000 years following permanant closure or such other fraction of the inventory as may be approved or specified by the Cosmission; provided, that this requirement does not apply to any radionuclide which is released at a rate less than 0.1 percent of the calculated total release rate limit. The calculated total release rate limit shall be taken to be one part in 100,000 per year of the inventory of radioactive waste, originally emplaced in the underground facility, that remains after 1,000 years of radioactive decay (10 CFR 60.113(a)(1)(ii)(B)).
 - b. Shaft boreholes and their seals shall be designed to ensure that release of radioactive materials to the accessible environment following permanent closure conforms to such generally applicable environmental standards for radioactivity as may have been established by the EPA with respect to both anticipated processes and events and unanticipated processes and events (10 CFR 60.112).

CONSTRAINTS:

A. The engineered barrier system must be designed such that other components of the repository such as shafts and drifts do not eventually become ground-water flow paths and do not premote the release of radionuclides to the accessible environment.

Definition:

Any material or structure that prevents or substantially delays movement of fluids or radionuclides... This material or structure will generally be manmade, but may include a portion of the host rock.