

WM Record File

101

WM Project

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JUL 28 1986

NOTE FOR: John Trapp
 FROM: Harold Lefevre
 DATE: July 28, 1986
 SUBJECT: DOE'S APPARENT CONSIDERATION OF NRR'S SAFETY EVALUATION REPORTS AS WMTG GEOLOGY/GEOPHYSICS "TECHNICAL POSITIONS"

DOE, in responding to several of NRC's draft BWIP EA comments used, as bases for the responses, positions taken by NRR geoscientists in conjunction with the Hanford Site nuclear power reactor Safety Evaluation Reports. These include, among others, positions on faulting, seismicity, and volcanic hazards. These NRR positions, which were taken for critical surface facilities (power reactors) with a projected commercial use of forty years, do not necessarily represent positions that will ultimately be taken by WMTG geoscientists when applied to the surface and subsurface waste repository facilities over longer time frames (100 and 10,000 years).

DOE should be advised that the NRR Hanford Reservation Safety Evaluation Reports (SER's) should not be considered as necessarily reflecting current or future WMTG geotechnical positions. DOE, by assuming that the NRC nuclear power reactor SER's represent de facto positions that are or will be taken by WMTG, can, and probably is, being lulled into what may be a false sense of security on numerous site issues.

I propose, over the next several weeks, to develop a draft statement addressing areas where positions that may be taken by WMTG may differ from those taken by NRR. The above statement will require considerable interaction and coordination with NRR.

DOE must be made aware that NMSS is not bound to accept NRR nuclear-power-plant-related safety evaluation report positions. DOE should also be reminded that one must constantly "readjust" to new concepts and thoughts which will continue to "surface" during the forthcoming extensive site characterization phase for the BWIP site.

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