

MAY 15 1981

Mr. Colin Heath
Office of Waste Isolation
Nuclear Waste Management Programs
Office of Nuclear Energy
Department of Energy
Washington, D.C. 20545

Dear Mr. Heath:

Thank you for your letter of April 23 regarding the benchmarking project recently proposed by the Swedish Nuclear Power Inspectorate.

We have carefully considered your recommendation that the NRC reconsider its position and take an active role. We agree that an international comparison of models and computer programs can have beneficial results. We also agree that our planned study of computer codes could complement the proposed Swedish effort.

However, we still consider our resources and present needs to be inconsistent with participation in this project at this time.

Our benchmarking project will not be initiated until the end of this fiscal year, and we expect any preliminary results to require an additional six months. At that time, we will reconsider active participation in the Swedish project. We remain very willing to provide any information from our ongoing studies which will assist the project, and we will be pleased to maintain communication on this subject with the Swedish Inspectorate.

Sincerely,

Original Signed by
John B. Martin

John B. Martin, Director
Division of Waste Management

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DATE	5/13/81	5/11/81	5/14/81				



Department of Energy
Washington, D.C. 20545

APR 23 1981

*Knapp - note + return
Bell
discuss when
[Signature]
4/28*

Noted

Mr. John B. Martin, Director
Division of Waste Management
U.S. Nuclear Regulatory Commission
M.S. 905-SS
Washington, D.C. 20555

Dear Mr. Martin: *Jack*

We learned with some dismay that NRC has declined an opportunity to participate in an international "benchmarking" study to be initiated by the Swedish Nuclear Power Inspectorate. Because this is the type of activity which should be of critical interest to regulatory agencies, we had proposed that NRC take the U.S. lead role in this study while DOE would provide assistance in formulating the study.

We have found that melding the thinking of other countries and that of the U.S. has often been beneficial to all concerned. In particular, it develops and strengthens the approaches to the point that a technical issue receives support from the international scientific community. We view this as particularly important on regulatory issues where models must be used as the only basis for predicting future impacts.

We understand that NRC is currently undertaking a study of computer codes including those supplied by DOE through ONWI. Since these activities include approaches to benchmarking, it would seem that the benefit of your studies, as well as the benefit of the international effort, would nicely complement each other and improve NRC confidence in the value of benchmarking.

We recommend that you reconsider NRC's involvement in such an international comparison. The proposed group has not scoped out the detail of the cooperation, and the commitment for future work is not yet developed. The most important part of this work is formulating the method by which benchmarking can be made appropriate. What better way is there than trying to do it?

In view of the uncertainty about your participation, we are advising the Swedish Nuclear Power Inspectorate that we still hope to have your participation. In the meantime, DOE and our contractor, ONWI, will attend the first organization meeting without a commitment to yet participate until the group formulates what is to be done, how it is to be done, and the overall schedule and likely commitments. This is of serious concern to other countries as well as to us because of the limited resources available for this work.

Again, we trust that you will reconsider an opportunity for NRC and DOE to work through an international arrangement where the work does not have to be tied to the issues of a particular U.S. site. This is the type of opportunity which we understood that you were looking for but now have declined. Therefore, we suggest that you still plan to attend the first meeting and reconsider based on the outcome of that meeting.

Sincerely,



Colin A. Heath, Director
Office of Waste Isolation
Nuclear Waste Management Programs
Office of Nuclear Energy

WI:CRC:mjc

cc: J. Vanderryn, IA
D. Vieth, NE-332
C. Newton, NE-332
A. Perge, NE-30
J. Neff, NPO
S. Goldsmith, ONWI
M. Conroy, ONWI
G. Boyer, NE-331