

- CF
- REBrowning
- MJBell
- JBunting
- PAItomare
- MRKnapp
- PSJustus
- JTGreeves
- LBHigginbotham JLinehan
- HJMiller JKennedy
- RRBoyle RLJohnson & r/f
- RJWright PDR
- SMCoplan

Mr. Jefferson O. Neff
 Program Manager
 U.S. Department of Energy
 Salt Repository Program Office
 505 King Avenue
 Columbus, OH 43201

FEB 24 1984

Dear Mr. Neff:

This letter confirms information on NRC's plans and preparations for reviewing the draft Environmental Assessments (EA's) which H. Miller presented at the November 15-16, 1983, meeting among DOE, NRC and the salt states (see Attachment 1) and which R. Johnson discussed in more detail with you in a telephone conversation on January 22, 1984. It also is in response to your January 23, 1984, letter to H. Miller which described potential state/DOE interactions.

I am enclosing a copy of the November 30, 1983, letter from R. Browning to J. W. Bennett and the November 16, 1983, letter from S. Coplan to D. Vieth (Attachment 2) which we telefaxed to you on December 5, 1983. These letters describe NRC's rationale for reviewing portions of the EA's, our needs for access to data as provided for in the DOE/NRC Procedural Agreement, and our views on what interactions are needed in general to keep pace with DOE data gathering and planning efforts.

As R. Johnson explained to you during the January 22, 1984, telephone call, the borehole summaries (first portion of the complete data inventory) together with the list of EA references received from you on December 30, 1983, have allowed us to more clearly plan what future interactions with DOE will assist the NRC staff in preparing to review the salt EA's. The interactions which we suggest are as follows:

- 1) Conference calls between NRC and DOE technical and management staff in each technical area for discussing the following topics:
 - a) Data inventory - type, location, and documentation of available data
 - b) Key documents
 - c) EA chapter/appendix content (e.g., discuss the use of modeling in EA's).
- 2) Data reviews with DOE/contractors (as identified in section 3a of the DOE/NRC Procedural Agreement) in geology, hydrogeology, geochemistry and rock mechanics to review data in unreleased data reports and other forms (e.g., Palo Duro basin completion

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reports). Data reviews would be 2-3 days and would involve very little DOE/contractor time except to generally describe the type, location, and form of available data and provide access to data and documents. No consultations are included at this time. Data reviews would most likely be held in Columbus, Ohio and in the March-May time period.

- 3) Technical meetings of 1-2 days would be useful in geology, hydrogeology, geochemistry, rock mechanics/design, and waste package to discuss selected topical areas identified during earlier data and document reviews. Additional selected data reviews might also be included here. These meetings should be planned for the late May-July time period, but their specific topics are presently not known.

The Performance Assessment workshop postponed from October, 1983, should be conducted in the late May to early June time period. This workshop would involve discussion of the modeling which will be used to support the EA's as well as consultation on overall performance assessment methodology.

As H. Miller mentioned in the November meeting minutes, DOE may desire putting off consultation on issues and future plans for addressing licensing issues to work on EA's. However, some of these issues (e.g., exploratory shaft construction and in-situ testing) are now on critical path for completion of site characterization and potential repository licensing. Therefore, putting off detailed technical meetings and consultation on licensing issues may cause delays in longer term schedules.

- 4) Early drafts of the EA's: During the January 25-26, 1984, meeting with the salt states and NRC and in your letter to H. Miller of January 23, 1984, DOE/SRPO offered to provide copies of early drafts of the EA's. While we would appreciate receiving any early EA drafts that you release, these early drafts will only be used in our planning and preparing for EA reviews. We are not planning at this time to comment on these early drafts since our work prior to receiving the draft EA's in August will be focused on reviewing the detailed results of data collection and analysis work conducted at each of the potential salt sites which will support the information summaries, evaluations, and conclusions presented in the draft EA's.

OFC	:WMRP:mkg RL	:WMRP	:WMRP	:	:	:	:
NAME	:RLJohnson	:JJLinehan	:HJMiller	:	:	:	:
DATE	:2/23/84	:2/ /84	:2/ /84	:	:	:	:

- 5) Establishment of technical contacts in each technical area:
 During the January 25-26, 1984, meeting we discussed the need for establishing NRC/DOE/contractor contacts in each technical area to facilitate our data reviews and exchange of technical information. We suggest these contacts be established in the immediate future.

In addition, please direct all future correspondence on the salt projects to my attention. R. Johnson will continue to be the contact for interaction with L. Casey of your staff.

We would appreciate any suggestions you have to facilitate these proposed interactions. R. Johnson will be contacting L. Casey to work out details concerning these interactions in the near future. As H. Miller stated in the November 16 meeting, careful upfront planning with proper information will result in activities which will best prepare the NRC staff for responding to DOE's request for comments on the draft EA's while at the same time not impacting DOE and contractor staff preparing the EA's.

Sincerely,

"ORIGINAL SIGNED BY"

John Linehan, Section Leader
 Salt Section
 Repository Projects Branch
 Division of Waste Management

Enclosures:

- 1. November 15-16, 1983, DOE/NRC/State meeting minutes
- 2. November 30, 1983, letter from R. Browning to J. W. Bennett and the attached November 16, 1983, letter from S. Coplan to D. Vieth

cc: L. Casey, DOE/SRPO

*See previous concurrence page.

Enclosures Already In File

OFC	: WMRP:mkg	: WMRP	: WMRP	:	:	:	:
NAME	: RLJohnson *	: JJLinehan	: HJMiller	:	:	:	:
DATE	: 2/23/84	: 2/27/84	: 2/7/84	:	:	:	:

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Sincerely,

John Linehan, Section Leader
 Salt Section
 Repository Projects Branch
 Division of Waste Management

Enclosures:

- 1. November 15-16, 1983, DOE/NRC/State meeting minutes
- 2. November 30, 1983, letter from B. Browning to J.W. Bennett and the attached November 16, 1983, letter from S. Coplan to D. Vieth

cc: L. Casey, DOE/SRPO

OFC	:WMRP:mkg	:WMRP	:WMRP	:	:	:	:
NAME	:RLJohnson	:JJLinehan	:HJMiller	:	:	:	:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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DATE 12/5/83

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AND REMOVE ALL STAPLES

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VERIFICATION NUMBER 976-7674

NO. OF PAGES 4 PLUS INSTRUCTION SHEET RETURN COPIES- YES ()
NO (+)

STATE & CITY Columbus Ohio

MESSAGE FROM: Robert Johnson

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301-427-4403 3M VRC AUTOMATIC

VERIFICATION NUMBER 301-427-4287 MAIL ROOM #100

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DATE: 12/5/83

TO: L. Casey

FROM: R. Johnson

SUBJECT: NRC's Preparation for EA Reviews

I have attached the NRC letters to Bennett and Vieth concerning NRC's preparation for EA reviews which H. Miller and J. Neff discussed this morning. Please give a copy of these letters to J. Neff. I will soon complete a specific letter to J. Neff on this subject.

Robert Johnson

WM-11/SMC/83/11/26

- 1 -
NOV 30 1983

J. William Bennett
Geologic Repository Division
Nuclear Waste Policy Act
Project Office
U.S. Department of Energy
S-10
Washington, D.C. 20545

Dear Mr. Bennett:

Attached is a November 16 letter from Seth M. Coplan of my staff to Donald L. Vieth, project manager of the NNWSI. The letter is concerned with the indefinite postponement of four previously scheduled workshops. As discussed in this letter, the NRC staff will need an opportunity to review the data upon which the Environmental Assessment (EA) is being based prior to the time that the draft EA is made available for public comment. The postponed workshops could have contributed to such an opportunity. Some substitute approach is now needed to allow NRC to conduct a thorough review of the data and data interpretations before important site suitability decisions are made. The attached letter outlines one such approach and followup discussions between Vieth and Coplan are occurring. Similar letters are being sent to other projects.

As I expect that ultimate resolution of the matter may eventually require your involvement, I am bringing it to your attention now. I would appreciate any attention that you might give to assure resolution. If you have any questions, please call either me or Hubert J. Miller.

Sincerely,

Original Signed by
Robert E. Browning

Robert E. Browning, Director
Division of Waste Management

cc: D. L. Vieth (DOE)

Enclosure:
Letter of November 16, 1983 to Donald L. Vieth



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

NOV 16 1983

Dr. Donald L. Vieth, Director
Waste Management Project Office
Department of Energy
Nevada Operation Office
P. O. Box 14100
Las Vegas, NV 89114

Dear Dr. Vieth:

I am writing in reference to your letters dated October 13, and 21, 1983 with regard to the indefinite postponement of four workshops previously scheduled as follows: (1) Performance Assessment, October 13; (2) Geochemistry, October 25-26; (3) Repository Design, November 8-9; and (4) Quality Assurance, during the week of December 7. When you informed me of these postponements by telephone before sending the letters, I expressed concern that they be rescheduled in sufficient time to allow the NRC staff to become familiar with data prior to the time that the draft Environmental Assessment (EA) will be made available for public comment.

Under the NWSA, the EA is a principal document in support of site screening decisions. As such, we anticipate that it will be a major technical review of investigations conducted to date at all of the sites being investigated by the DOE. Accordingly, we would also expect that sufficient information will be provided (a) to establish the accuracy, reliability and applicability of the data and (b) to support interpretations of data made in applying the siting guidelines. Therefore, either by directly presenting them in the EA itself, or by reference to other documents and information sources, we would expect the EA to present all of this data and the DOE interpretation of it in terms of basic features that will determine site suitability (i.e. the selection factors established in siting guidelines). This data base is massive. It includes raw data and detailed information about their collection and many levels of data reduction and assessment. In the data base are the results of the hydrogeology, geology, geochemistry and engineering tests and investigations of potential sites. Specific examples of such data include hydrologic heads, lithologic, drillers and other well logs, material properties and many others.

Experience in connection with both the BWIP SCR and earlier NTS workshops has shown that our data interpretations can be significantly different from those of the DOE. We will, of course, be doing a thorough data review in connection with our review of the SCP. At that time, we will

review the existing data to establish what is known and not known about the site. However, I trust that you would agree that it would be prudent for NRC to complete a comprehensive review and criticism of the data base and interpretations made by DOE in the draft EA before major suitability decisions are made.

Therefore, for the purpose of EA review, the NRC staff needs the opportunity to examine the data and information base where wide dissemination is not possible because of form or recency of collection. In addition, we will need to be briefed on the assessment models and codes DOE plans to use for the quantitative assessments of performance, if any, that will be included in the EAs. We need the opportunity for in depth data review and limited consultation with the principal investigators on location in the near future in each of the technical areas that will be addressed in the EA. This should amount to no more than what you are already doing to make data available to the state; it could be done in a way that requires little more than making space available for NRC staff and providing someone to guide them to specific data. Also, it would facilitate our preparation for the review if you would send us an outline, table of contents, and a set of all of the references for the EA as early as practicable before the draft EA is issued.

The cancelled workshops had a dual purpose: (1) review of existing data and data interpretations to identify potential licensing issues and (2) consultation on plans to generate data to resolve those issues. A data review of the kind described above for the EAs addresses the first purpose; however, there may also be plans for gathering data which are on the licensing critical path that need to be discussed. We should discuss ways that we can effectively deal with any such items.

Please call me as soon as possible so that we can establish an approach and schedule that will allow the NRC staff to complete its pre-EA review preparations.

Sincerely yours,



Seth M. Coplan, Project Manager
Repository Projects Branch
Division of Waste Management