

April 27, 2004

H. Lawrence McKague  
Element Manager  
Center for Nuclear Waste Regulatory Analysis  
6220 Culebra Road  
P.O. Drawer 28510  
San Antonio, Texas, 78238-5166

SUBJECT: REVIEW AND APPROVAL OF IM 06002.01.051.445 - REVIEW OF DOE DOCUMENTS PERTAINING TO IGNEOUS ACTIVITY KEY TECHNICAL ISSUE AGREEMENTS 2.11 AND 2.14

Dear Mr. McKague:

We have performed a review of the above reference Intermediate Milestone and find it both programmatically and technically acceptable provided one minor change is made to the document. In the introduction to the report the relationship of these two agreement items to the NRC's risk rankings was unclear. This concern has been discussed with Dr. B. Hill of your staff who provided the following suggested modification:

This review addresses Igneous Activity Key Technical Issue Agreements 2.11 and 2.14, which were made between DOE and NRC during the Igneous Activity Technical Exchange and Management Meeting (Reamer, 2001). Subsequent to this meeting, NRC staff developed a basis for risk-ranking the key technical issue agreements (Travers, 2003). Agreements necessary to provide the baseline information about the site generally were considered to have low risk significance relative to repository performance. In contrast, agreements that affected risk calculations through moderate increases in radionuclide transport characteristics were considered to have medium risk significance. Using qualitative risk-ranking methods, NRC preliminary analyses suggested that Agreement 2.11 had medium significance to risk calculations, whereas Agreement 2.14 had low significance (Travers, 2003). Staff conducted more detailed risk-ranking analyses, which showed that processes affecting airborne mass loads and subsequent inhalation dose estimates had high significance to risk calculations (NRC, 2004). Thus, Agreements 2.11 and 2.14 have high risk significance relative to repository performance because the subjects of these agreements affects an overall understanding of airborne mass loads.

NRC. "Risk Insights Baseline Report. Revision 00. Washington DC: NRC. April, 2004.

H. L. McKague

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We consider that substitution of this paragraph for the present second paragraph within the Intermediate Milestone resolves our concerns.

If there are any questions please contact me at (301) 415-8063 or by e-mail at [jst@nrc.gov](mailto:jst@nrc.gov).

Sincerely,

/RA/

John S. Trapp, Program Element Manager  
Igneous Activity Key Technical Issue  
Division of High-Level Waste Repository Safety  
Office of Nuclear Material Safety  
and Safeguards

cc: B. Meehan, ADM/DCPM/CMC1  
C. W. Reamer, NMSS/DHLWRS

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Office of Nuclear Material Safety  
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cc: B. Meehan, ADM/DCPM/CMC1  
C. W. Reamer, NMSS/DHLWRS

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