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MEMORANDUM FOR: John J. Linehan, Acting Chief
Repository Projects Branch

FROM: John T. Greaves, Chief
Engineering Branch

SUBJECT: RESPONSE TO DOE ON WAPS for WVDP AND DWPF

This is in reply to WMRP's request that we review DOE's Draft Waste Acceptance Preliminary Specifications (WAPS) for the West Valley Demonstration Project (WVDP) High Level Waste Form (OGR/B-9), April 1986 and Waste Acceptance Preliminary Specifications for the Defense Waste Processing Facility (DWPF) High-Level Waste Form (OGR/B-8), April 1986.

We have reviewed these two documents and our three main comments are presented below.

Our first main comment is that these specifications are very general rather than specific. The specifications do not address any key issues regarding the durability of the waste form. The Draft Waste Acceptance Preliminary Specifications (WAPS), therefore, appear to be primarily an outline of information that is to be supplied at a later, unspecified date by the waste form producer and/or by the repository project. In this sense WAP is an administrative document that identifies topics or attributes that must be addressed by the waste form producer in the Waste Form Compliance Plan (WCP) and in the Waste Form Qualification Report (WQR). For example, the WAPS state that at the time of publication the test procedures and acceptance criteria for Specification 1.3, Radionuclide Release Properties, were not available (these procedures are being developed along with each project's Site Characterization Plan and depend upon site-specific performance allocations for the waste form. These procedures and acceptance criteria will be added to the specifications when they become available). We feel that these procedures and criteria are the most important parts of the description of the waste form. We, therefore, do not understand how DOE can proceed meaningfully without them.

We continue to encourage DOE to complete the six activity items recommended in our letter of December 16, 1985, before producing the WVDP and DWPF high-level waste forms. We believe that such a course of action would minimize the risk of producing waste forms that could not be accepted by a repository for disposal.

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Our second main comment is that DOE should plan to interact with NRC on the Waste Form Compliance Plan, the Waste Form Testing Programs and the Specific Waste Form Qualification Reports (Steps 9, 10 and 11 of the Waste Acceptance Process).

Our third main comment is that each of the specifications should contain a section on references. The documents that support the various sections of the WAPS should be cited.

Detailed comments are presented in the enclosure.

We propose that after DOE has reviewed our comments a meeting be arranged with them to discuss the WAPS for DWPF and WVDP and possible future interactions on this subject.

If you have any questions or wish to discuss this further, please contact Everett Wick or Tim Johnson at x74111 and 74088, respectively.

ORIGINAL SIGNED BY

Timothy C. Johnson

John T. Greeves, Chief
Engineering Branch

Enclosure:
As stated

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