



**Department of Energy**  
Office of Civilian Radioactive Waste Management  
Office of Repository Development  
1551 Hillshire Drive  
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QA: N/A  
Project No. WM-00011

**AUG 17 2004**

**OVERNIGHT MAIL**

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**U.S. DEPARTMENT OF ENERGY'S (DOE) DESCRIPTION OF PLANS FOR  
RETRIEVAL OF RADIOACTIVE WASTES AT A GEOLOGIC REPOSITORY AT  
YUCCA MOUNTAIN, NEVADA**

The purpose of this letter is to inform the U.S. Nuclear Regulatory Commission (NRC) staff of DOE's approach to addressing waste retrieval in the License Application (LA) and to request feedback on this approach. Retrieval is defined in 10 CFR 63.2 as the act of permanently removing radioactive waste from the underground location at which the waste had been previously emplaced for disposal. A description of plans for retrieval and alternate storage is required to be included in the LA by 10 CFR 63.21(c)(7).

As required by 10 CFR 63.111(e), the design of the repository will preserve the option of waste retrieval. Since any potential need for retrieval is speculative, DOE is providing information in the LA regarding the feasibility of retrieval using the currently designed facility equipment to show that the design of the repository preserves the option of retrieval.

The design approach that DOE is using to satisfy this requirement is to ensure the repository design and emplacement processes do not preclude the retrieval of any or all waste packages prior to completion of the Performance Confirmation Program. If a decision for retrieval is made, specific plans for retrieval and storage would be developed and defined in detail at that time. Safety analyses would be performed to evaluate the safety aspects of actions necessary to remove the waste from the underground emplacement area.

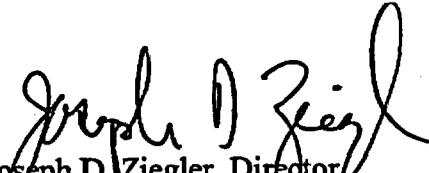
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Waste retrieval plans would include descriptions of proposed equipment and operations to support development of the safety analyses. These analyses would include the specific conditions under which retrieval operations would be performed. These plans would be submitted to the NRC for review and appropriate licensing action prior to initiating waste retrieval. The LA will describe this conceptual plan and approach for retrieval. A more specific, detailed retrieval plan will not be submitted to NRC unless and until a decision has been made to retrieve the waste.

The DOE believes this approach, to be reflected in the LA, is consistent with the requirements of 10 CFR 63.21(c)(7) and 63.111(e). It is requested that the NRC review this approach to the submittal of waste retrieval plans and advise if any aspect is inconsistent with NRC requirements.

There are no new regulatory commitments in the body of this letter. Please direct any questions concerning this letter to Kirk D. Lachman at (702) 794-5096 or e-mail [kirk\\_lachman@ymp.gov](mailto:kirk_lachman@ymp.gov), or April V. Gil at (702) 794-5578 or e-mail [april\\_gil@ymp.gov](mailto:april_gil@ymp.gov).

  
Joseph D. Ziegler, Director  
Office of License Application & Strategy

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