

Department of Energy

Office of Civilian Radioactive Waste Management 1551 Hillshire Drive Las Vegas, NV 89134-6321

QA: N/A Project No. WM-00011

OCT 26 2006

OVERNIGHT MAIL

ATTN: Robert Johnson, Project Manager Licensing and Inspection Directorate High-Level Waste Repository Safety Division Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, DC 20005-0001

REQUEST FOR EXTENSION OF COMMENT PERIOD ON PRECLOSURE SAFETY ANALYSIS (PCSA) – LEVEL OF INFORMATION AND RELIABILITY ESTIMATION INTERIM STAFF GUIDANCE (ISG) HLWRS-ISG-02

- References: (1) Federal Register Notice, September 29, 2006, Vol. 71 FR 57584,

 Notice of Availability of Draft Interim Staff Guidance Document

 HLWRS-ISG-02, Preclosure Safety Analysis-Level of Information and
 Reliability Estimation
 - (2) Ltr, Williams to Director, Division of High-Level Waste Repository Safety, dtd 8/25/06 (Transmittal of Summary of Preclosure Safety Analysis Reliability Assessment Methodology)

The purpose of this letter is to request a 30-day extension to the comment period from November 13, 2006, to December 13, 2006, for review of the U.S. Nuclear Regulatory Commission's (NRC) draft ISG *Preclosure Safety Analysis - Level of Information and Reliability Estimation* (Reference 1). This ISG is focused solely on methods related to NRC staff review of a license application to be submitted by the U.S. Department of Energy (DOE) pursuant to 10 CFR 63.

In late August, DOE provided NRC the summary report describing methodologies to be used to conduct reliability assessments to support the Yucca Mountain, Nevada, repository PCSA event sequence quantification and categorization (Reference 2). In addition, NRC and DOE have scheduled a Technical Exchange on November 8, 2006, to discuss DOE's approach and NRC staff feedback on the summary report.

The extension is requested to allow sufficient time following the November 8, 2006, Technical Exchange to ensure that DOE's comments resulting from the review of the ISG take into consideration discussions held at the Technical Exchange. I appreciate your consideration of this request.

Please contact me at (702) 794-5567 or e-mail mark_williams@ymp.gov, or contact April V. Gil at (702) 794-5578 or e-mail april_gil@ymp.gov if you have questions on this request. There are no new regulatory commitments in this letter.

RAO:AVG-0050

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