

HLWYM HEmails

From: Elmo Collins
Sent: Wednesday, November 24, 2004 3:47 PM
To: Jack Guttman; Lawrence Kokajko; Janice Moore; Mitzi Young; Wesley Patrick; C.W. (Bill) Reamer; Frederick Brown; Gregory Hatchett; Marissa Bailey; King Stablein
Cc: Kien Chang; Omid Tabatabai
Subject: Re: Management Review Board vote on groundwater panel recommendation
Attachments: Elmo's voteGroundwater Panel Recommendations.wpd

as requested - see attached
Elmo

>>> Marissa Bailey 11/19/04 11:24AM >>>

As Lawrence pointed out at the end of yesterday's meeting, we have three options:

- (1) Accept the all of the panel's recommendations
- (2) Reject the all of panel's recommendations
- (3) Partially accept/reject the panel's recommendations

If you choose Option 2 or 3 (or even Option 1, if you'd like), please give me your vote on each recommendation, comment/concern with each recommendation, and proposed solution/path forward in the format shown on the attached document.

Please provide your input by COB Wednesday, November 24.

Thank you.

Marissa

Hearing Identifier: HLW_YuccaMountain_Hold_EX
Email Number: 1223

Mail Envelope Properties (Elmo.Collins@nrc.gov20041124154639)

Subject: Re: Management Review Board vote on groundwater panel recommendation
Sent Date: 11/24/2004 3:46:39 PM
Received Date: 11/24/2004 3:46:39 PM
From: Elmo Collins

Created By: Elmo.Collins@nrc.gov

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Post Office:

Files	Size	Date & Time
MESSAGE	642	11/24/2004 3:46:39 PM
Elmo's voteGroundwater Panel Recommendations.wpd		17043

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

HLWRS Management Review Board of Groundwater Panel Recommendations

GW Panel Conclusion and Recommendation	Agree or Disagree	Comment or Concern with Panel Conclusion or Recommendation	Your Proposed Solution
<p>Slide 10: Must DOE provide the dimensions of the representative volume? Yes</p> <p>Conclusion: Clarification needed. The Yucca Mountain Review Plan may allow DOE to skip the requirements of 10CFR63.332(b) [i.e. two methods for determining representative volume]</p> <p>Recommendation: Revise YMRP to ensure that the method used to determine the representative volume is consistent with 10 CFR 63.332(b)</p>	<p style="text-align: center;">agree</p> <p>an ISG to clarify may be sufficient</p>		
<p>Slide 11: Could multiple years of contamination exist within the representative volume? Yes</p> <p>Conclusion: Clarification needed. NRCs current approach that in any given year, all of the radionuclides crossing the accessible environment boundary are mixed into 3000 acre-feet of water and withdrawn, is not consistent with EPA's stated goal of pollution prevention.</p> <p>Recommendation: Revise YMRP to ensure that the approach used to calculate "groundwater protection" maximum concentration limits is consistent with EPA's intent not allow the "remediation" of the ground water in order to meet ground water protection standards.</p>	<p style="text-align: center;">Disagree</p>	<p>A consensus view from which to move forward has not been developed.</p>	<p>Need to 1) understand the downside of using the multi-year approach and 2) make sure that OGC view of whether or not this approach is consistent with the regulations is considered</p>

HLWRS Management Review Board of Groundwater Panel Recommendations

GW Panel Conclusion and Recommendation	Agree or Disagree	Comment or Concern with Panel Conclusion or Recommendation	Your Proposed Solution
<p>Slide 12: What is the basis of NRC approval of the DOE choice between the two approaches to determine the dimensions of the “representative volume.” Either is acceptable provided that the assumptions made do not result in a distorted result</p> <p>Conclusion: Clarification needed. Yucca Mountain Review Plan should provide for a clear review of assumptions to assure that results are not distorted.</p> <p>Recommendation: Revise YMRP to ensure that the assumptions use to determine the representative volume do not distort the results</p>	<p>agree clarification would be useful</p> <p>an ISG may be sufficient</p>		
<p>Slide 13: Can the representative volume be located fully or partially within the controlled environment? No</p> <p>Conclusion: Clarification needed. The current Yucca Mountain Review Plan requires the representative volume to be in the controlled area.</p> <p>Recommendation: Revise YMRP to ensure the representative volume is not within the controlled area.</p>	<p>Agree</p>		

HLWRS Management Review Board of Groundwater Panel Recommendations

GW Panel Conclusion and Recommendation	Agree or Disagree	Comment or Concern with Panel Conclusion or Recommendation	Your Proposed Solution
<p>Slide 14; Must the calculation for the IPS and the GWPS be identical? No, but they are similar</p> <p>Conclusion: Clarification needed. The extensive use of the words “consistent with” throughout the Ground-Water Protection Standard sections of the Yucca Mountain Review Plan creates confusion between compliance with the Ground-Water Protection Standard and the Individual Protection Standard.</p> <p>Recommendation: Revise YMRP to provide clarification</p>	<p>agree to provide clarification as needed after the multi-year issue is addressed</p>		
<p>Slide 16: Is the “Peak of the Mean” appropriate for demonstration of compliance with the Individual Protection Standard? Yes</p> <p>Conclusion: No clarifications needed. The “mean of the peaks” (which provides higher dose values) than the “peak of the means” is also acceptable. It is DOE’s decision.</p> <p>Recommendation: No changes to needed</p>	<p>agree</p>		

HLWRS Management Review Board of Groundwater Panel Recommendations

GW Panel Conclusion and Recommendation	Agree or Disagree	Comment or Concern with Panel Conclusion or Recommendation	Your Proposed Solution
<p>Slide 17: Is the “Peak of the Mean” appropriate for demonstration of compliance with the Ground Water Protection Standard? Yes</p> <p>Conclusion: No clarifications needed. Further, the “mean of the peaks” (which provides higher dose values) than the “peak of the means” is acceptable. It is DOE’s decision.</p> <p>Recommendation: No changes needed</p>			