

Statement by the
PYRAMID LAKE PAIUTE TRIBE
before the
NUCLEAR REGULATORY COMMISSION
MAY 15, 1997

Good morning, my name is Maurice Eben, I am an enrolled member of the Pyramid Lake Paiute Tribe and currently serve as a Tribal Councilman. Our tribal offices are located in Nixon, Nevada. The Tribe appreciates the opportunity to present our statement to the Commissioners of the Nuclear Regulatory Commission.

The Pyramid Lake Indian Reservation was surveyed in 1859 and was confirmed by Executive Order in 1874 by Ulysses S. Grant. The Tribe has been through many social, economic and cultural changes since the reservation was created.

Since time immemorial, we Indian People have had a respect for the land that we walk upon. At no time has that caretaking responsibility changed. Indian People are still the rightful caretaker of this land. As we proceed and continue our discussions from this day forward, we will remind you of this responsibility and stand by the prayer and sincerity to our Creator in allowing us to continue that responsibility.

I am a descendent of the two major tribes of the Great Basin, Cui-ui-Ticutta of the Northern Paiute and Timbisha of the Western Shoshone. The Cui-ui-Ticutta are from the Pyramid Lake region of the Great Basin and the Timbisha of Death Valley region of the Great Basin.

Due to the Indian Reorganization Act, our parents were forced to enroll their offspring with one tribe. My parents chose my father's tribe. Although I was

brought up in Northern Nevada, we traveled to Death Valley on a regular basis to enjoy my mother's side of our family. Both my parents spoke their respected languages. Both of my parents attended the Stewart Indian School in Carson City, Nevada. After my birth I lived on the Pyramid Lake Paiute Indian Reservation and as most families we moved into the Truckee Meadows where my parents could find employment.

The Reno Sparks Indian Colony sat on land donated by a kind hearted elderly non-Indian lady for the three Nevada Indian Tribes (Paiute, Shoshone and the Washoe). The Colony's residents were mostly related to each other or knew family from respected reservations or the Stewart Indian School. We were brought up around great uncles and aunts, grandparents and cousins to most degrees. The extended family truly was a common part of life at the Colony. Fortunately for me I was taught some of the Coyote Stories and Legends of the three tribes of the Reno Sparks Indian Colony. The Washoe are mostly from the Sierra Nevada Mountain areas with ancient ties to the Great Basin before moving into the mountains. The Western Shoshone came into the Basin about 10,000 years ago in search of food. The Paiute People according to the scientists were in the Great Basin for about 15,000 years.

The 400,000 square miles is bordered on the east by the Wasatch Mountain Range in Utah, the Snake River to the North, the Sierra Mountains on the west and as far south as the Mojave Desert.

The Timbisha People lived and died in the regions from the Sierra Nevadas to the west to as far as the Colorado River to the east. Following the traditions of the other Great Basin Peoples burials took place in the eastern side of the valleys and in the rock crevices in outcrops on the sides of mountains that at one time were islands of the Lahotan Inland Sea. These burial caves are found through out the Great Basin

and are known to grave robbers too. Mr. Jack Harrelson of Grants Pass, Oregon was one of those grave robbers, he was convicted in the State of Oregon for taking two bodies from graves found in areas of the Great Basin which are similar to Yucca Mountain. As with the Southern Paiute the Timbisha share common cultural beliefs and legends such as Coyote being the jester. The morals are the same as both Northern and Southern Paiute.

I would like to say this for the record. There is an on going effort by many tribes to correct their histories. In the past there were some attempts to change tribal history by a few misguided tribal members. This was done with the thorough knowledge of a number of anthropologist and ethnohistorians with only the publication of their work, ^{in mind,} instead of accuracy and truth. The process taken in identifying and notifying affected tribes is was purposefully flawed. There is a concerted effort by Federal Agencies today to change the history of the Great Basin People. The Bureau Of Land Management and the State of Nevada Museum have taken the position that the first inhabitants of the Great Basin have only been in the region for 1,000 years. There is no known scientific data to support their theory, none the less they are attempting to use their theories against us. I would request that the Nuclear Regulatory Commission study all the ethnohistories for accuracy and factual material. With out the truth from the original inhabitants of the Yucca Mountain region is a insult to the entire process. The history of the ~Timbisha People should be studied very closely for it's accuracy. Most important the anthropologist doing the histories of the Great Basin Tribes should also be investigated.

The history of our People in the Great Basin is from oral history and scientific. According to the time measurement of the Great Basin Curvilinear attributed to petroglyphes found in the Great Basin our People have been in the region for up to 15,000 years. Many of our ceremonies are the same, and are practiced during the same time of year. The Cry Dance is done when a death occurs, the meaning of the

dance is the same with the Southern and Northern Paiute. Our legends of how the pine nut got to the top of the mountain is the same with the same outcome and meaning. The Park Service told the Indian People they were no longer welcome to pick pine nuts in the Wildrose Mountains in 1944-45, the site chosen was the Yucca Mountain area. This area was known to our People for other cultural uses.

The story of the Ghost Dance and of Wodziwob's vision was one of the many histories told to us by elders from the Paiute's side. In this vision he saw the return of our brothers who had traveled to the other side of the world.

As prophesied our older brother was in chains put there by our little brother. They had new things we would not understand. Our Dance would help us as one people to understand each others ways. The understanding of our Mother Earth would come from the Red People. Should this Dance be done correctly the Creator would bring water in it's many forms and cleanse and bless us. Wodziwob's vision showed the dance steps and the songs, the vision showed the clothing required to be worn and what they should be made of. Deer hide with long fringe on the front of the shirt to shake off the sicknesses and to be shaken off through the fringes onto our Mother Earth.

With most ceremonies there comes a negative side and in the case of the Ghost Dance it is said that four men would come out of the east who will turn the dance into it's opposite. Wodziwod's vision was one of love and peace. The vision met the Dance would be turned into a war dance. Should this happen the worse would happen. People would die! Our Dance would one day return and be brought to us by the one's who came to the Great Basin to get it. Over the years gifts have been sent to the Cui-ui-Ticutta and the Tagi-Ticutta from the people who took our Dance to their homes. Seventeen years ago our Dance returned to the Great Basin and was given to Stanley Smart of Paiute, Shoshone, Pit River lineage. The prophesy told the Dance would be given to a Snake Person, who we were before the name Paiute was

put on US. Wodziwod's vision is only a piece of the total prophesy believe by. It is believed that when the four races return to the basket we will be able to make the sound the Creator is waiting for us to make.

It is our understanding that since our creation we have always followed the south end of the lake we call Cui-ui-Pah (Pyramid Lake). Our culture is tied to the Ancient Inland Sea known as Lahotan Lake. 14,000 years ago the climate of the Great Basin was wet and full of lakes, during the Pleistocene Era (1.8 million years ago) there was over 27,000,000 acres of lakes, today there are only 2,500,000 acres. 5,000 years ago the Inland Sea started to dry up. The Lahotan Inland Sea covered a vast area of 8,000 square miles and was 900 feet deep. During the drought period the water slowly drained south and east. On the east side of the many valleys the sands were halted which became one of the areas used to bury our dead. During periods of high water the cliffs exposed by the ever beating of wave after wave, the volcanic up lifts help to make natural burial chambers. These chambers were prepared with loving care by place mats made of tule reeds Food was stored in willow woven baskets, blankets made of rabbit hides were made to keep the body warm. Clothing was made for the journey home. The cave would be used when it was necessary by placing another body on top of the previous grave. This practice was used up until recent times.

The Tribe is currently directly involved with an issue with the nuclear industry that includes the Departments of Energy, Defense and Navy, and the private sector. The project is known as the Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel. This Program will result in the transportation of spent nuclear fuel through our Tribal Lands. Although it is known that transportation is an old practice, the issue of involving our Tribe is new. As a matter of fact, the Record of Decision was issued on May 13, 1996 but the Tribe did not receive official notification from the federal government until January 1997. Furthermore, we received a notice from the State of Nevada on October 3,

1996 inviting the Tribe to a meeting in San Francisco to discuss shipment of foreign nuclear fuel.

The National Environmental Policy Act was violated. No consultation occurred between the federal government and the Tribe. Had DOE followed the spirit of Executive Order 12898, pertaining to Environmental Justice, they would have been on notice to at least contact the Tribe. This DOE never did. At this point we do not visualize any consultation occurring in the near or distant future. This treatment between two governments is all too familiar, and we request that the Commission seriously consider and reconsider its authority by which it is vested towards federal agencies responsible for carrying out the obligations of the federal government.

When an Indian Tribe is affected either directly or indirectly by any project involving the nuclear industry, the seriousness of impacting the environment must be the primary consideration and not secondary. This nuclear energy and nuclear waste is not part of our Indian society to which we belong. This makes it harder to understand and accept. Although the science and technology can be taught and shared, there is a fundamental and conceptual difference that exists between the natural law and the man-made written laws. It is important to us to demonstrate to you that we are unique, but that we do not feel any superiority to you. All we expect is equal treatment from you just as you would treat your relatives and families.

We would like to acknowledge the efforts of the National Congress of American Indians over the years for their monitoring of and providing education to Tribes on the effects of nuclear waste. The Tribe is willing to work with the federal government and its regulatory agencies to come to a common understanding, but only as long as the consultation process is done fairly and legally. We will support the NRC in its efforts in the development of an Indian Policy as other federal

agencies have done in compliance with the President's Executive Memorandum of April 29, 1994 to all heads of departments and agencies regarding government to government relations of Native American Tribal Governments.

STATEMENT OF
ROBERT R. LOUX, EXECUTIVE DIRECTOR
NEVADA AGENCY FOR NUCLEAR PROJECTS
NUCLEAR WASTE PROJECT OFFICE
TO THE
UNITED STATES NUCLEAR REGULATORY COMMISSION
ROCKVILLE, MARYLAND

MAY 15, 1997

The Nevada Agency for Nuclear Projects was established by the State Legislature, in 1985, to carry out the State's oversight and participation duties pursuant to the Nuclear Waste Policy Act of 1982. In the course of this work, from time to time we request a meeting with the Commission to present some of our views on current matters relevant to the Commission's pre-licensing considerations and activities associated with the Office of Civilian Radioactive Waste Management's (OCRWM) high-level nuclear waste management and disposal program. Our last presentation to the Commission was on September 9, 1994.

We appreciate the opportunity to meet with the Commission at the same time OCRWM is providing you with an update of its waste program. It is our hope that this will help broaden the perspective from which the Commission considers some of the issues which will come before it in the near term.

We will be discussing four major topics today in terms of their relation to the Commission's responsibilities: 1) the site characterization and licensing approach described in the May 1996 OCRWM Revised Program Plan; 2) the proposed OCRWM revision of the 10 CFR 960 Siting Guidelines; 3) the OCRWM Viability Assessment; and 4) NRC regulations regarding transportation of spent nuclear fuel.

Site Characterization and Licensing Approach

We discussed this topic in our 1994 presentation to the Commission relative to the OCRWM's Proposed Program Approach. With the subsequent 1996 OCRWM Revised Program Plan, the primary issue remains unchanged. It still appears that OCRWM intends to submit a less-than-complete repository license application to receive a Construction Authorization.

The most notable deficiency in the license application will be the lack of data to support a thermal loading design. An accelerated drift scale heater test is planned to be initiated later this calendar year, with maximum heat-up expected in late calendar year 1999. It is understood that the heat-up period may require significant extension. Even if this portion of the experiment goes as scheduled, there is little time to collect and analyze data on critical aspects of cool-down before the scheduled submission of a license application in early 2002. Also, we know of no plans for further work to confirm the representativeness of the underground location of the drift scale heater test in the context of the entire proposed repository block.

Yucca Mountain Project managers have begun to speak of the License Application as the "Initial License Application" for a Construction Authorization, with two additional "Updated License Applications" to follow, one to receive and possess, and one for repository closure. This approach was most recently revealed in an April 30, 1997, NRC/DOE Management Meeting, in which Yucca Mountain Project managers outlined their interpretation of the statutory and regulatory basis for the phased submission of a License Application. (See Attachment 1.)

OCRWM's phased approach to the development of a License Application appears to be in conflict with the regulatory approach of 10 CFR Part 60, and should be carefully studied by the Commission. In 10 CFR 60, it seems clear that the Commission's disposal decision, based on a finding of reasonable assurance of regulatory compliance, is made with the issuance of a Construction Authorization. That decision is then to be further confirmed with a license amendment to receive and possess. And finally, after the operational period and at the end of the retrievability period, an amendment is to be submitted for repository closure, which is intended to be the final confirmation of the Commission's initial "reasonable assurance" finding.

Conversely, the OCRWM licensing approach would have the Commission taking incremental steps toward a disposal decision, which would occur after its review of the License Amendment for Repository Closure. If this were the case, the Commission's determination of reasonable assurance of compliance with the EPA standard would not be made until after as much as 100 years of repository operation and all the waste had been emplaced.

"Disposal," according to 10 CFR Part 60, "means the isolation of radioactive wastes from the accessible environment." And, "retrieval means the act of intentionally removing radioactive waste from the underground location at which the waste had been previously placed for disposal." Therefore, it would be inconsistent with Part 60 to consider the repository operation and retrieval period to be a time during which new and necessary information to support a disposal decision is to be collected.

OCRWM has incorrectly interpreted the Commission's requirement for a "performance confirmation" program to be a continuation of site characterization, for example, establishing the scientific basis for an effective thermal design, when instead, the intent of the requirement is to assure evaluation of the "accuracy and adequacy" of the information used to support the original disposal decision, which was made at the time of issuance of a Construction Authorization.

Further confirmation of the Commission's intent that the disposal decision be made based on the original License Application is found in the Commission's 1990 Waste Confidence Decision, which states in part:

"The Commission finds reasonable assurance that at least one mined geologic repository will be available within the first quarter of the twenty-first century...to dispose of commercial high-level radioactive waste and spent fuel..." (emphasis added).

Accepting the OCRWM's incremental licensing approach, which defers the disposal decision for up to 100 years into the future - long after the Commission's 2025 date - would invalidate this crucial finding of the Commission's Waste Confidence Decision.

Since passage of the Nuclear Waste Policy Act, nearly 15 years ago, the Commission has repeatedly reminded OCRWM that it must submit a complete and high-quality license application in order for it to be reviewed in the short time mandated by the Act. Throughout those years, we have periodically raised the question of the acceptability of a phased licensing approach with Commission staff. It appears that the time is rapidly approaching for the Commission to clarify its meaning of a "complete and high-quality License Application."

Proposed Revision of OCRWM Siting Guidelines

As you are aware, on December 16, 1996, the Department of Energy published in the Federal Register proposed amendments to its 10 CFR Part 960 "General Siting Guidelines for the Recommendation of Sites for Nuclear Waste Repositories." In order for the Guidelines or any subsequent amendments to be finally promulgated, the concurrence of the Commission is required.

In the Commission's previous concurrence proceedings, a guiding principle was that, in order to gain concurrence, the guidelines should be consistent with, or at least not in conflict with the Commission's repository licensing rule, 10 CFR Part 60. Also, implicit in the consideration was whether the guidelines were consistent with the requirements of the Nuclear Waste Policy Act.

By incorporating the requirement that the repository be found to perform in accordance with the EPA standard and the relevant regulations of the Commission, the Proposed Guidelines (assuming the NRC Staff's April 17, 1997, recommended language change is adopted) may meet the consistency test for the Commission's regulations. The Staff recommendation correctly clarifies that, contrary to OCRWM's interpretation, 10 CFR Part 60 has a broader scope than simply the implementation of the EPA standard. For example, if Part 60 was intended only to implement the EPA standard, the subsystem performance requirements of 60.113 would not be applicable in the Commission's licensing decision. The OCRWM interpretation in the proposed guideline amendment may be a suggestion to the Commission that, in its planned amendment of Part 60, the scope should be limited only to implementation of the EPA standard. If this is being suggested, we strongly disagree with OCRWM's position.

The Commission's concurrence in the guidelines prior to a new site-specific EPA standard for a Yucca Mountain repository and conforming amendments to Part 60 poses a problem. But, according to OCRWM's schedule, there is no immediate need for final guidelines. The current schedule calls for finalization of the guidelines in February 1998, with a draft site recommendation based on the guidelines scheduled for late calendar year 2000. During that nearly three year period, it is expected that both EPA and NRC will have revised regulations for Yucca Mountain in place. For this reason, it is our recommendation that the Commission withhold its concurrence decision until revisions to the EPA standard and Part 60 are promulgated. This will not delay or disrupt OCRWM's performance-based evaluation of the Yucca Mountain site.

The matter of whether the proposed guidelines comply with Section 112(a) of the Nuclear Waste Policy Act should be taken up at the time the Commission considers its concurrence. The Attorney General of Nevada, in commenting on the proposed guidelines on January 23, 1997, said that the proposed guidelines violated the requirements of the Act, primarily because they do not specify, as required, factors that qualify or disqualify the site. Nevada will challenge the guidelines if promulgated as proposed.

If the Commission withholds its concurrence and defers it until appropriate EPA and NRC regulations are in place, the litigation, if necessary, is likely to have been resolved, and the Commission can then evaluate whether it believes the guidelines for which concurrence is sought comply with the requirements of the Act.

Viability Assessment

OCRWM will be issuing a Viability Assessment for the Yucca Mountain site in September, 1998. As you have been told, the

Viability Assessment will consist of four reports to be delivered to the President and Congress: 1) the critical elements of repository and waste package design; 2) a total system performance assessment for the repository system based on current designs; 3) a plan, schedule, and cost estimate to develop a license application; and 4) a total waste management and disposal system cost evaluation.

The Viability Assessment is defined only by the four reports, and OCRWM does not intend to make a statement on its view of the viability of the site. Instead, "viability" is expected to be in the eye of the beholder - in this case, the decision-makers who may determine whether to continue work toward a repository license application at Yucca Mountain.

The term and meaning of Viability Assessment was invented by OCRWM and only later included in legislation. The Commission has no role in assessing the "viability" of the site since the intent of the exercise is to inform an investment decision on whether to continue to pursue repository development at Yucca Mountain, and according to OCRWM, the Viability Assessment is "independent of regulation."

The Commission's sole responsibility regarding the Viability Assessment should be to decide the extent to which it wants to review and comment on the design and performance assessment reports, as it does with all other prelicensing documents when its participation is not required by law.

The Viability Assessment has been, and will continue to be misconstrued by many as a statement of the site's suitability for development as a repository. But, suitability, in the context of the Nuclear Waste Policy Act, includes a determination of whether the site is qualified under the DOE 10 CFR Part 960 siting guidelines. This determination, which supports a recommendation to the President to proceed with a repository license application, is scheduled to be made by the Secretary of Energy in 2001, after additional site characterization work has been completed. Therefore, any inference of the suitability of Yucca Mountain for development of a repository at the time of the Viability Assessment would be incorrect and prejudicial.

Section 114 of the Nuclear Waste Policy Act requires that the Commission provide, at the time of the Secretary's recommendation of the site to the President: "preliminary comments...concerning the extent to which the at-depth site characterization analysis and the waste form proposal for such a site seem to be sufficient for inclusion in any application to be submitted by the Secretary for licensing of such site as a repository."

In response to the Viability Assessment, the Commission need not, and should not, provide a draft or early "preliminary

comments" on "sufficiency" of the site characterization information. There are two important reasons for this: 1) OCRWM, by including the license application plan as part of the Viability Assessment, is indicating its own belief that the information is insufficient for a license application or a suitability determination; and 2) the Commission making an early statement regarding sufficiency of information for a license application will only reinforce the wide-spread misrepresentation that the Viability Assessment is somehow a statement of the suitability of the Yucca Mountain site.

Regulations Regarding Transportation of Spent Fuel

Because of proposed legislation that would begin transport of spent fuel to an interim storage site adjacent to Yucca Mountain, on the Nevada Test Site, there is growing nation-wide interest in the safety of nuclear waste transportation. Transportation cask certification standards and criteria and safeguards during transport are two elements that are consistently raised as safety concerns, both by oversight groups and the public.

Rail and highway conditions and technologies, cask designs, and the ability to willfully disrupt transport have changed greatly in the many years since the Commission's regulations regarding these two areas were promulgated. Casks are being designed for larger payloads with lighter fabrication materials than were originally contemplated when the regulations were written. And, there has been an enormous increase in the power and sophistication of weapons available to would-be terrorists since the issue of transportation safeguards was last considered.

To promote public confidence, we recommend that the Commission hold a broad-based public review and dialogue regarding spent fuel transportation risk for both normal and off-normal conditions and events. The existing cask certification standards and criteria and safeguard regulations should be reviewed and revised as necessary, in the context of the outcome of this public dialogue. Included in the review should be an analysis of the radiological risk from routine transportation operations, severe accident conditions, and disruption by terrorist activity.

Such a review is timely in that large numbers of spent fuel shipments could begin in the near future if new legislation is adopted. Also, it is reasonable to expect that a number of new designs for transportation casks will be submitted to the Commission for certification in the next few years, since the demand for a new generation of transport and dual-purpose transport and storage casks is expected to grow in the near term.

**FINAL AGENDA
NRC/DOE MANAGEMENT MEETING**

Video Conference

April 30, 1997

Hillshire Blue Room; NRC Headquarters, T2B5; DOE Headquarters, GF-277

10:00 AM PST (1:00 EST)

- **OPENING REMARKS** ALL
- **PROGRAM STATUS**
 - Update on DOE/NRC briefing to Commission ALL
 - Legislative/FY-98 budget update DOE/NRC
 - Status of Licensing Strategy DOE
 - Early Feedback to DOE Prior to VA NRC
 - Additional Work for VA Risk Mid-year Course Correction DOE
 - Discussion of NRC's Annual Report NRC/DOE
 - Status of DOE's Waste Containment and Isolation Strategy DOE
 - Status of Project Integrated Safety Assessment (PISA) DOE
 - Management Issues Raised by State NRC
 - Interim Storage Topical Report DOE/NRC
 - Tribal Pre-notification of Shipment DOE
- **CLOSING REMARKS** ALL
- **ADJOURN**

2:00 PM PST (5:00 PM EST)

*Annotated with
actual language*

Level of Detail for Information in the Initial LA

Overview

- **DOE will submit a complete, docketable LA by 2002**
 - This LA will allow NRC to make its reasonable assurance determination for the Construction Authorization
- **It is important for DOE and NRC to have a common understanding of what is needed for the initial LA**
 - How much is enough?

How Much is Enough?

- Enough = When uncertainties have been sufficiently understood and bounded
 - Further testing and analysis will not add significantly to this understanding
- Sufficiency depends on what the information will be used for
- Three levels of sufficiency
 - ~~Initial~~ LA (for Construction Authorization) 60.31
 - ~~Updated~~ LA (for License to Receive and Possess) 60.33
 - ~~Updated~~ LA (for Closure) 60.51
- This step-wise process was contemplated by both the Nuclear Waste Policy Act and 10 CFR 60

Amendment
of Construction
Authorization
Amendment

Sufficiency for Initial LA

Nuclear Waste Policy Act (NWPA)

- The NWPA restricts site characterization to what the Secretary decides is necessary for the ~~initial~~ LA and for compliance with NEPA (§ 113(c))

*For a
construction
authorization*

- House Report 97-491 (accompanying H.R. 3809, ultimately enacted as the NWPA):

“Site characterization activities are intended to be kept to the reasonable minimum expense and impact and are intended not to be so extensive as to result, through physical impact or through economic commitment, in the prejudicing of decisions regarding further development of the site.”

Sufficiency for Initial LA

(continued)

NWPA (cont'd)

- The Site Recommendation is to be based, among other things, on limited site characterization information and preliminary engineering specifications (§ 114) *specifications for the facility*
- The NWPA requires DOE to submit the LA shortly after the Site Recommendation becomes effective
 - As a practical matter, there would be little new information between the Site Recommendation and LA
- Therefore, the ~~initial~~ *for construction authorization* LA would also be based on limited site characterization information and ~~a~~ preliminary design engineering specifications *for the facility*

Sufficiency for Initial LA

(continued)

10 CFR 60

- Part 60 requires the initial LA to be as complete as possible in light of information available at the time of docketing (§ 60.24(a))

- The Commission ~~contemplates that there will be~~ ^{may take} “uncertainties and gaps in knowledge”, (§ 60.101)

into account, provided that the Commission can make the specified finding of reasonable assurance as specified in paragraph (a) of this section.

that is reasonably

Sufficiency for Initial LA

(continued)

10 CFR 60 (cont'd)

- The Commission recognized that it would be unable to make definitive findings on some issues at the early stages of repository licensing
- Consequently, Part 60 requires DOE to identify issues requiring further study, including a schedule for their resolution (§ 60.21(c)(14))

research
and
development

Sufficiency for Initial LA

(continued)

- In summary, DOE will provide in the initial LA the information sufficient for the decision being made
 - To authorize construction of the repository
- Consistent with the NWPA and Part 60, additional information will be provided in subsequent LA *amendments* ~~updates~~ to support future decisions
 - To grant a license to receive and possess
 - To amend the license to close the repository
- This is also consistent with the step-wise information provided to support reactor licensing