

NRC FORM 218 (4-76) NRCM 0240		U.S. NUCLEAR REGULATORY COMMISSION		DATE 3/11/82	
TELEPHONE OR VERBAL CONVERSATION RECORD				TIME 10:30 ☒ A.M. ☐ P.M.	
☒ INCOMING CALL		☐ OUTGOING CALL		☐ VISIT	
PERSON CALLING Jim Duguid		OFFICE/ADDRESS ONI, Germantown		PHONE NUMBER EXTENSION 353 4626	
PERSON CALLED Wright		OFFICE/ADDRESS WMHT, Silver Spring		PHONE NUMBER EXTENSION 427 4177	
CONVERSATION					
SUBJECT Paper by Linda Lehman + Ellen Quinn					
SUMMARY Called to say that the paper on geochemical interpretation of groundwater flow in the Columbia Plateau is excellent, "very professionally done" and "worthy of publication." When questioned, Duguid said (1) that the conclusions of the paper should be taken into account in the BWIF SCR; (2) if there is an institutional concern about publication, the paper should at least be circulated to DOE and placed in the PDR.					
REFERRED TO: Lehman, Quinn, Bell, Knapp				☐ ADVISE ME OF ACTION TAKEN.	
ACTION REQUESTED Miller, Justus, Verma				INITIALS	
				DATE	
ACTION TAKEN				INITIALS	
				DATE	

LINDA/ELLEN PAPER
GEOCHEM-FLOW BWIP

3/14/82

Hub,

I have a policy-oriented concern for the publication of any paper by NRC staff on any aspect of an issue that we use or will consider in licensing a facility. The subject paper draws conclusions, or at least makes inferences, that themselves ultimately may become licensing issues. DOE or intervenors may later accuse Linda/Ellen of prejudging their reviews of material that will be submitted by DOE & their contractors that is on Linda/Ellen's own work. Also, by publishing our "preliminary opinions" we force the applicant to consider the opinions (or NRC staff conclusions) as if they are law and must be argued pro or con. If the DOE accepts the Linda/Ellen documents conclusion or inferences then NRC is on the spot should the data or conclusions be later proven wrong OR if other valid hypotheses exist but are not considered by NRC or DOE. It's dangerous, in a sense, for NRC to publish such results. However, these ideas

(cont)

have great value in stimulating discussion and useful action between ORC and applicants/contractors and should be the subject of direct communication between us, soon.

I strongly recommend that this report not be published as a paper in a professional journal, yet, as if it were the results of a conclusion of (albeit, preliminary) research. It is more properly handled as a source of contention with DOE, an inter-agency matter. There will be many other ideas generated as reviews continue; they must serve as stimuli to resolving issues/contentions and not become issues unto themselves.

DRD

Linda
Ellis
Mike
Mark
Bob W.

ITEM 007

Publication note is acceptable of the ideas in the document - a balanced approach to resolving questions raised about the Pasco area - the latter is designed to be uncertainties/risks in data based and in alternative hypotheses.

3/12/82

Bob W. H. H.

I generally agree with
that. He was previous
note to you in this.

Please make sure
that the notes raised
in Lunt's paper get
raised through the notes
project group. I hope in
of your plans.

W.H.