

10



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 04 1981

MEMORANDUM FOR: Homer Lowenberg, Assistant Director for
Operations and Technology
Division of Fuel Cycle & Material Safety, NMSS

FROM: Robert F. Burnett, Director
Division of Safeguards, NMSS

SUBJECT: FY '82 OPERATING PLAN FOR THE CRBR
CONSTRUCTION PERMIT

We agree with the resource estimates for the Division of Safeguards portion of the safety and environmental reviews. The safety review, however, should only list Chapter 13 Industrial Security for 48 man weeks.

In the schedule for the environmental review, we note that the expected date for receiving additional information from the applicant has already passed. Because of this delay it is doubtful whether the current review schedule can still be met, especially if the DOE response is delayed into January 1982 as you indicated it might be during discussions with my staff.

In the Task Work description enclosed in your memo, the basis of the resource estimates for the safeguards portion of the environmental review should be changed. Please delete the sentence "In the safeguards area...evaluation" and replace it with Attachment 1. This change will make your memo consistent with the information that was requested by PSD in preparation for a meeting between Mr. Dircks and Mr. Davis.

Regarding the possibility of using Battelle Pacific Northwest Laboratories (BPNL) for technical assistance in the environmental review, BPNL has been asked to include a statement of the safeguards and environmental assessment experience of available BPNL personnel in their response to you. Please forward this to us when you receive it.

RFB
Robert F. Burnett, Director
Division of Safeguards, NMSS

Enclosure:
As stated

ATTACHMENT 1

Because of allowed contentions in the CRBR hearing process, the environmental review will necessitate a determination of the adequacy of safeguards provisions sufficient to protect the environment. This determination of adequacy will involve all DOE operations in the CRBR fuel cycle to include Pu Oxide production; fuel fabrication and refabrication; independent spent fuel storage; spent fuel reprocessing; transportation of SNM, fresh fuel and spent fuel; and waste handling facilities.