

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

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MEMORANDUM FOR: Homer Lowenberg, Chief Engineer
Office of Nuclear Material Safety
and Safeguards

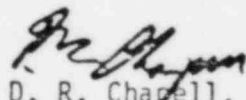
FROM: D. R. Chapell, Deputy Director
Division of Safeguards, NMSS

SUBJECT: CRBR FUEL CYCLE ENVIRONMENTAL REVIEW

We agree with your opinion that the material submitted by DOE to cover its fuel cycle activities in the CRBR environmental report is inadequate. DOE has primary responsibility for demonstrating to the public that the CRBR fuel cycle will not have an adverse environmental impact. With respect to safeguards, the DOE supplement does not accomplish that demonstration. Also, while the reports referenced in the half-page submittal will be of some use, they do not provide sufficient information for us to fulfill our confirmatory role.

As discussed in the February 3 meeting with DOE, they should add to their EIS information on the general safeguards strategies and concepts they plan to use. They should identify and describe the generic systems and technologies they will apply to each component of the fuel cycle (including transportation activities) and specify the overall level of performance they expect to achieve. For systems that have not been demonstrated in operating facilities, evidence from DOE's research and development program should be cited to substantiate their viability. Research and development evidence should also be provided to support the extension of proven technologies to parts of the CRBR fuel cycle that are significantly different from the facilities where the technologies have been established. As indicated by the hearing board, DOE should also add the dollar cost of these safeguards systems to the cost section of the EIS.

In the February 3 meeting, DOE said they would submit a description of a generic reprocessing facility to accompany the safeguards systems information. They said that the exact identity of the facility will not be specified. This approach is acceptable to us, provided DOE's facility description contains enough general information for us to assess the applicability of the safeguards systems they plan to implement. It is our understanding that the Fuel and Material Examination Facility will be used for CRBR core fabrication. Facility design information for this and other CRBR fuel cycle facilities should be provided in a manner comparable to that which DOE indicated it would submit for the reprocessing plant.


D. R. Chapell, Deputy Director
Division of Safeguards, NMSS

cc: R. Erickson