

JAN 15 1991

Mr. Charles A. Pelletier
Manager, LLRW Program
Connecticut Hazardous Waste
Management Service
900 Asylum Avenue, Suite 360
Hartford, CT 06105

Dear Mr. Pelletier:

As requested in your November 6, 1990, letter, we have conducted a review of the Draft Generic Site Characterization Plan (SCP) and Draft Quality Assurance Plan (QA), submitted by the Connecticut Hazardous Waste Management Service. The purpose of this letter is to transmit our comments.

A principal objective of our review was to prepare comments addressing whether the SCP describes a program for collecting data needed to demonstrate whether the regulatory criteria in 10 CFR Part 61, and the guidance provided in NUREG-1199, NUREG-0902, and Regulatory Guide 4.18, will be satisfied. Similarly, a principal objective of our review of the QA Plan was to prepare comments indicating whether the same regulatory criteria and guidance, and the additional guidance provided in NUREG-1383, and NUREG-1293, will be satisfied. Our comments on both documents are enclosed.

Because these documents directly support future licensing related activities, the NRC will be charging a fee for the staff review. The staff expended 10 hours of review time and the Service will be separately billed by our Fee Collection Branch for these hours at the rate of approximately \$90/hour.

We appreciate the opportunity to comment on these documents and hope that the comments will be useful to the Connecticut siting program. If we can be of any further assistance, please call either myself at (301) 492-0553, or Robert Hogg at (301) 492-0579.

Sincerely,
(SIGNED) PAUL H. LOHAUS

Paul H. Lohaus, Chief
Low-Level Waste Management Branch
Division of Low-Level Waste Management
and Decommissioning, NMSS

Enclosure: As stated

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NRC STAFF COMMENTS ON CONNECTICUT
HAZARDOUS WASTE MANAGEMENT SERVICE
SITE CHARACTERIZATION AND
QUALITY ASSURANCE PLANS

I. Site Characterization Plan

- a. This document is appropriate only as a generic plan. The activities described in a generic document are, and must be, only activities that can be carried out at all potential sites. As a result of the nature of the document, the plan does not contain any site specific activities which would be part of any site specific characterization studies. Our review was therefore limited by the scope of the document.
- b. Section 11.0 of the SCP describes the contents of a Site Characterization Report that will be prepared upon completion of site characterization testing. This report will contain findings and conclusions for each site and an assessment of site suitability as a location for a Low-Level Waste (LLW) disposal facility. Because the report may be a part of or incorporated by reference in the license application, we suggest that you consider using the outlines in our Standard Format and Content documents for a Safety Analysis Report and an Environmental Report, NUREG-1199 and Regulatory Guide 4.18 respectively, for the outline of the Site Characterization Report. This would facilitate the use of the document in the licensing process.
- c. Figure 3.1 describes the overall site characterization process for the Connecticut program. One of the decision points in this process is whether any sites fail the site suitability evaluations. However, the only decision addressed in the diagram is if none of the sites fails. The actions to be taken if one or more sites fail are not specified.
- d. The description of the verification testing phase in the SCP is not clear. The SCP states that "These [verification testing] activities will gather the data necessary to verify the identification of the preferred site. Verification testing at the three candidate sites is to be completed when the preferred site has been adopted by the Board." We suggest that the wording be revised to more clearly indicate the purpose and timing of verification testing.
- e. The SCP frequently references portions of the NRC's Standard Review Plan (NUREG-1200), e.g. Sections 5.2, Stratigraphy and 5.3, Structural Geology. It would also be beneficial if the Standard Format and Content Guide (NUREG-1199) was referenced to help ensure that all of the information needed in the license application was obtained.

- f. Although Connecticut has not selected a method for LLW disposal at this time, the staff recommends that the Service consider referencing the staff's guidance on alternate methods of near-surface disposal contained in NUREG-CR-3774, Volumes 1-6. This NUREG contains some general guidance on site characterization activities and their relationship to design of disposal facilities.

II. Quality Assurance Plan

- a. The Quality Assurance Plan should cover all organizations and personnel performing "quality affecting activities" for the Project. Several organizations are identified as being covered by the Battelle Plan, but the Connecticut Hazardous Waste Management Service is not included. The QA Plan should describe the relationship between the Service and the Project. The Service should also identify quality affecting activities that it will be performing and prepare a QA Plan for these activities.

Document Name:
RH/C.PELLETIER/1/8

Requestor's ID:
JONESJ

Author's Name:
R. Hogg 1/8/91

Document Comments:
Connecticut Pre-Licensing doc review