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Hydrogeology • Mineral Resources Waste Management • Geological Engineering • Mine Hydrology

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April 16, 1984

Contract No. NRC-02-83-033

Communication No. 15

Ms. Barbara Cooke  
Division of Waste Management  
Mail Stop 623-SS  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

WM Record File

137-29

WM Project 16

Docket No.

PDR

LPDR

Distribution:

BCOCC

(Return to WM, 623-SS)

Dear Barbara:

We received on this date the trip report for Golder Associates. A few comments are in order.

Golder believes that questions remain regarding the definition of a conceptual model. We found the NRC definition clear and acceptable. What are Golder's questions regarding what they refer to as an "appropriate definition of a conceptual model".

Golder states on page 2 of their trip report "Williams and Associates suggest that we collect data first and then determine if it is needed." This statement is not quite accurate. Williams and Associates feel that the development of a conceptual model of the site requires a certain amount of site specific data. These data enhance the knowledge of the site so as to allow the investigators to define further data needs. We do not suggest that DOE proceed to collect masses of data at the sites prior to conducting any form of data review and evaluation. We believe that we have made our point clear on this item in previous discussions.

We suggest that Golder revise their descriptive terminology in the attachment to their trip report. The particular terminology which should be changed refers to the "unflawed geologic system" and the further references to "natural flaws" and "man-made flaws." We feel that this terminology is inappropriate for geologic systems. A fault is part of normal geology and should not be referred to as a flaw. Golder refers to man-made flaws such as boreholes and shafts. However, the term is misleading; a more appropriate term such as feature should be used. Boreholes and shafts are man-made features or structures not flaws.

We also object to the terminology on the last page of the Golder trip report. Golder refers to "perfect" geology. Consistent hydrogeologic terminology consists of terms such as homogeneous

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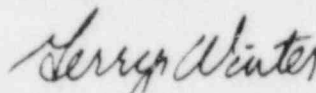
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and isotropic. We are dealing with groundwater flow systems; consequently hydrogeologic terminology is most appropriate. These terms are well accepted in hydrogeology.

We understand that the NRC intends to provide specific guidance to Golder with respect to the processes which would be evaluated. Consequently we do not choose to make any comments regarding the processes listed on the last two pages of Golder's trip report.

If you have any questions, please do not hesitate to call. We regret the delay in responding on Golder's trip report; however, we just received the trip report.

Sincerely,

A handwritten signature in cursive script that reads "Gerry W. Winter".

Gerry W. Winter