

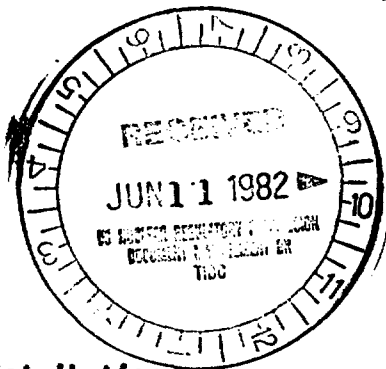
WM-1
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JUN 01 1982

MEMORANDUM FOR: Distribution

FROM: John T. Greeves, Section Leader
Design Section
High-Level Waste Technical
Development Branch
Division of Waste Management

SUBJECT: BASIC NRC HEALTH & SAFETY RESPONSIBILITIES IN
REPOSITORY LICENSING (RELATED PRIMARILY TO DESIGN)

Attached for your information is a chart (draft) which lists the minimum requirements that impact repository design. This chart was derived directly from current and proposed regulations. The purpose of this chart is to clearly identify the minimum requirements that must be considered in repository design. If you have any comments, note them on the chart and return your comments to me.

ORIGINAL SIGNED BY

John T. Greeves, Section Leader
Design Section
High-Level Waste Technical
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Enclosure

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WM-1 PDR

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DATE	6/1/82	6/1/82					

Areas of Responsibilities

Radiological Safety

- On Site
Normal Operation

Accidents

- Off Site
Normal Operation

Accidents

Non-Radiological Safety

(Protection of workers from injury and death)

Other Supporting Requirements

OPERATION

RET(VAL

CONTAINMENT/ISOLATION

10 CFR 60/EPA STD.

RETRIEVAL*

Part 20 (5rems/yr - Control Area)

No directly applicable limit

EPA STD. (25mrems/yr)

Part 20 (500 mrems/yr) & Part 60.111

Part 60.2 (500 mrems per event)

+Concerns such as covered in
MSHA/OSHA Regs.

Assure Ability to Retrieve
10 CFR 60.111(b)

Maintain Stable Openings
10 CFR 60.133(e)

- o Releases to the accessible environment shall be less than the limits specified by EPA STD.
- o Engineered System to meet 10^{-5} release rate
- o Waste Package to meet 1,000 yr. containment
- o 1000 yr. groundwater travel time to accessible environment

Support for Meeting EPA Std. and Performance Objectives

- o Maintain integrity of the waste package
- o Assure construction-related effects (e.g., subsidence, fracturing) do not result in significant transport pathways

+There is no statutory requirement for NRC to consider this; however, the staff is concerned about these requirements. WMHT is currently working with the Department of Labor, MSHA, to establish what role will be played by Federal regulating agencies given that DOE's interpretation that by law they will be regulating themselves in this area.

*Is a higher than normal occupational exposure unit acceptable or appropriate during a retrieval period? Currently Part 20 limits (5 rems/yr) appear to apply; however, following the completion of the retrieval contract, WMHT will review these requirements based on experience gained from this contract.

Pittiglio Rev. 1 5/27/82