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Mr. Sheldon Meyers
Deputy Assistant Secretary for
Nuclear Waste Management
U.S. Department of Energy
Mail Stop B-107
Washington, DC 20545

Dear Mr. Meyers:

Attached is a copy of the trip report prepared by the Nuclear Regulatory Commission (NRC) staff on its September 22-25, 1981 review of site investigations at the Hanford Basalt Waste Isolation Project (BWIP). The trip report raises several major issues that I would like to bring to your attention.

The primary concern relates to the development of plans for hydrologic investigations at the site. There are two points to make on this:

1. There are currently several widely different views on the general pattern of groundwater flow in the Pasco Basin. These have been put forth by Rockwell Hanford and other groups working in and having expertise in the Pasco Basin and surrounding region--viz., the U.S. Geological Survey and Pacific Northwest Laboratories of Battelle. The RHO program suffers from a lack of vigorous interaction with the other groups to understand the basis for the differing views and to work to assure that they are resolved so that the whole matter is not left to be litigated as a licensing issue. The questions of hydrogeology are complex and will take some time to sort out. It is important that development of the specific investigations intended to resolve these questions (as presented in the site characterization report) involve close interactions with the Geological Survey and others having the expertise and experience discussed above.
2. It appears the five-year hydrology test program will not result in sufficient data to answer basic questions about groundwater movement.

We also attach considerable importance to two other concerns.

1. At the time of the NRC visit, the conceptual repository design did not consider the effects of the indicated high stress field. We understand, now, that an analysis of this problem is in progress.
2. The scope of the site characterization report (SCR) will be inadequate. As it is being prepared, it will cover only a portion of the tests which will be performed in underground test facilities.

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Mr. Sheldon Meyers

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These issues, and other lesser issues, are discussed in more detail in the trip report. I invite your attention to the conclusions at the front of the report.

We believe that there is an urgent need for in-depth technical interactions on these matters. The objective is to assure that issues relating to the investigations during site characterization are identified and resolved as early as practicable, to avoid unnecessary delay in the DOE schedule. Clearly, such an approach will best serve the national interest in the search for a suitable repository site.

The alternative--to proceed with present site characterization plans with which the NRC is expressing important reservations--is apt to result in an SCR on which the NRC may be unable to render a favorable analysis. Proceeding in this manner would appear to be contrary to our mutual interest in avoiding unnecessary delay.

Because of the ongoing development of the SCR, we place high importance on early discussions to find common ground on the site characterization plans. We are prepared to meet beginning the first week in January. The issues of interest to us, such as hydrogeology, are complex and undoubtedly will take considerable time for discussion and resolution.

I look forward to hearing from you soon to set up such meetings.

Sincerely,

Original Signed by
John B. Martin

John B. Martin, Director
Division of Waste Management

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