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MEMORANDUM FOR: Robert J. Wright
BWIP Project Manager
High-Level Waste Technical
Development Branch
Division of Waste Management

WM Record File

WM Project WM-10

Docket No. _____

PDR _____

LPDR _____

FROM: F. Robert Cook
High-Level Waste Licensing
Management Branch
Division of Waste Management

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SUBJECT: STANDARD OUTLINE FOR CHAPTER OF THE DRAFT SITE
CHARACTERIZATION ANALYSIS: PRACTIAL PROBLEMS WITH
ACHIEVING

Your memorandum of December 15, 1982 requested revising Draft Chapters for the SCA in accordance with Attachment A to this memorandum. This included a request to revise Chapter 8, Waste Package. The request was that this be accomplished in Draft 2, scheduled for completion by December 22, 1982.

I find this request impractical to accomplish for the following reasons:

1. None of my team's efforts to date have been oriented at trying to describe material presented in the SCR. On the contrary, the team has identified issues which must be resolved to demonstrate the waste package relative to performance elements 3, 4 and 5 described in Appendix C to the SCA.
2. Assessment of BWIP plans for demonstrating waste package performance has been with respect to the key NRC issues identified in SIA's. Hence, SCR BWIP issues which were not of importance in resolving NRC SIA's were not assessed in the chapter. There are many BWIP issues and work elements which are not addressed in this regard.
3. The proposed outline does not tie the evaluations of site characterization plans and programs to the NRC SIA's. If this is not

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the basis, an entire re-evaluation of the plans and program from some other viewpoint would need to be initiated. This will take considerable time and would necessarily have to be based on some technical logic, not yet identified. On the other hand, if we are not changing the ground rules for assessing BWIP plans and programs, i.e., those pertinent to resolution of key NRC issues, then the outline must highlight major NRC issues, not BWIP issues. This feature is clearly missing from the attached outline.

Aside from the impracticality of accomplishing the requested changes in the time frame identified (1 week), I find the proposed outline unsatisfactory for discussing separate technical issues. I cannot make a coherent technical story by grouping unrelated issues in one section, unrelated evaluations in another and unrelated actions to be resolve issues in yet a third section.

Also, I find the items 1 and 2 of the attached outline redundant with either the SCR itself or other chapters or appendices of the SCA and, hence, a waste of space, not pertinent to addressing the major technical issues.

ORIGINAL SIGNED BY

F. Robert Cook
High-Level Waste Licensing
Management Branch
Division of Waste Management

PDR on delayed basis.

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STANDARD OUTLINE FOR DSCA CHAPTERS

1. Introduction
 - 1.1 Type of material presented in the SCR
 - 1.2 Relevant sections of 10 CFR 60
 - 1.3 Relation of SCR and NRC issues (making use of Appendix C)
2. Summary of SCR conclusions and assertions
3. Analysis and discussion of issues, conclusions and assertions in the SCR
4. Evaluation of site characterization plans and program
5. Recommendations for site characterization plans and program