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WMHL: ✓ 3101.1  
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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

101.1

WM Project WM-10

Docket No.

PDR

LPR

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

Distribution:

(Return to WMA, 623-88)

SUBJECT: DRAFT 2 OF BWIP SITE CHARACTERIZATION ANALYSIS;  
COMMENTS ON

In response to your request for comments on the subject Draft SCA, I have the following main comment. (Recommended word changes are attached.)

Section C.1.1.6 is vague and off the point as it would comment on the adequacy of the conceptual design presented by the SCR as required by 10 CFR 60.11(a)(6)(ii). This section of 10 CFR 60 requires a description of "a conceptual design of a repository appropriate to the site in sufficient detail to allow assessment of the site characterization program with respect to investigation of activities which address the ability of the site to host a repository and isolate radioactive waste, or which may affect such ability."

The main point that our conclusion should make is that the conceptual design does not include design criteria for reliability of the various barriers in the multi-barrier engineered system. Without such criteria the staff cannot determine if the engineered system will likely meet

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performance objectives with reasonable assurance (adequate reliability) and that the various barriers in the engineered system will provide their proportional share of the required isolation and/or containment function.

**Original Signed By:**

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

Enclosure:  
As stated

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## Attachment

Proposed wording for SCA conclusions:

### Section C.1.1.6 - Conclusions -

Revise the 4th sentence as follows: "Second with respect to 60.11(a)(6)(ii) the description of a conceptual design is inadequate in the following respects: a) Reliability design criteria for each component of the engineered system and applicable to their respective functional or performance roles in the multiple barrier system are not described. b) Different engineered systems and components are described without specific statements that any constitute the conceptual design to be described in accordance with 60.11(a)(6)(ii). Discussions relative to "conceptual designs" on pages 17.3-3, 14.3-2, 11.6-4; descriptive material in Chapter 10 and the discussion of "reference" designs in Chapter 11 create ambiguity in this regard.