



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JAN 21 1987

MEMORANDUM FOR: Philip S. Justus, Acting Chief
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John T. Greeves, Chief
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Division of Waste Management, NMSS

John J. Linehan, Acting Chief
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Division of Waste Management, NMSS

Frank A. Costanzi, Chief
Waste Management Branch, DES
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FROM: Joseph O. Bunting, Chief
Policy and Program Control Branch
Division of Waste Management, NMSS

SUBJECT: TECHNICAL REVIEW OF 10 CFR PART 60 REQUIREMENTS ANALYSIS

In order to prepare for licensing of the HLW repository facility, NRC must develop the capability to provide an independent, technically competent evaluation of DOE activities. In addition, NRC must assure that its licensing requirements are complete and implemented in a timely manner and that guidance is provided to DOE on information needs, acceptable methodologies, and design considerations necessary to support licensing decisions; all in sufficient scope and detail for individual findings required by 10 CFR Part 60.

Enclosed is a draft requirements analysis of 10 CFR Part 60. The document interprets 10 CFR Part 60 for the purpose of ascertaining what individual licensing determinations are required for each section of the regulation, determining which sections of the regulation require input from NRC, and the nature of the required staff action. Collectively, these so-called "licensing findings" or "requirements" will serve HLW-related program planning and integration in several ways. Foremost among these are the identification of information needs necessary to evaluate DOE's site and design and the identification of those principal technical, policy, or institutional concerns (open-items) that must be resolved prior to licensing.


The requirements analysis lists 402 findings (or requirements) and is comprised of four parts. It was prepared using the January 1, 1986 edition of the Code of Federal Regulations and other, more current editions of the Federal Register. The first two parts are, respectively, the 10 CFR Part 60 section number and section title. Section numbers are listed in ascending order and section titles are cited directly from the regulation itself. In instances where 10 CFR Part 60 cites no section title, one has been provided

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parenthetically. The third part paraphrases the 10 CFR Part 60 regulation. The last part describes the particular licensing finding or work action which DOE or NRC must perform in order to satisfy the regulation.

The document has already been forwarded to the OGC for comment. We are distributing it to you now so that a technical review may commence. Specifically, we would like you and your staff to review and comment on the required licensing findings or work actions that have been proposed and present any differing interpretations you may have. The required licensing findings or work actions should be described succinctly and yet, sufficiently caveated to clarify any ambiguities that appear in the description.

In closing, it should be noted that the requirements analysis is founded in part and in substance upon work previously performed by a few Division staff members. By integrating this work into the document, we believe that the Division can begin to achieve significant inroads towards defining objectives and coordinating a strategic approach to all future HLW activities. After reviewing the document, we hope you will share our opinion concerning its importance to the HLW program and will afford it your highest priority for action. I will schedule a briefing on this activity in the near future. Please prepare and submit your comments to me by February 27, 1987. Michael Lee (x74444) has been designated to answer your questions and comments. Thank you for your time and cooperation.


Joseph O. Bunting, Chief
Policy and Program Control Branch
Division of Waste Management, NMSS

Enclosures: As stated

cc: R. E. Browning

OFFICIAL CONCURRENCE AND DISTRIBUTION RECORD

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John J. Linehan, Acting Chief, WMRP
Joseph O. Bunting, Chief, WMPC

FROM: Robert E. Browning, Director, WM

SUBJECT: COORDINATING TECHNICAL REVIEW OF 10 CFR PART 60
REQUIREMENTS ANALYSIS

DATE: February 2, 1987

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