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M E M O R A N D U M

TO: Michael Lee, Division of High-Level Waste Management
U.S. Nuclear Regulatory Commission

FROM: Carl A. Johnson, Administrator of Technical Programs *Carl*

DATE: March 20, 1992

SUBJECT: State of Nevada Comments on March 17 and 18, 1992
Technical Exchanges

Enclosed are State of Nevada comments on the March 17 Technical Exchange on the NRC's Thermal Loads STP and the March 18 Technical Exchange on air and vapor movement. It would be appreciated if these comments could be added to the meeting summary for the public records.

Call me if there are any questions.

CAJ:jem

Enclosures

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NRC\DOE Technical Exchange on NRC STP
on Geologic Repository Operations Area Underground
Facility Design - Thermal Loads

March 17, 1992

State of Nevada Comments

The State of Nevada is satisfied with the NRC staff's responses to the State's comments on the STP. In its closing remarks the State reiterated two points presented in its comments and in staff responses.

1. A cornerstone of the STP is the assumption that Performance Assessment models will exist for evaluating compliance with 10 CFR 60 performance objectives. NRC staff in response to a State comment asserted that the assumption was reasonable, and cites the Performance Assessment efforts of NRC, DOE, and EPRI to support the assumption. While the State does acknowledge the present efforts of NRC, DOE, and EPRI in Performance Assessment, it is skeptical of the staff's assertion that adequate PA models will exist for evaluating compliance with 10 CFR 60. The current level of PA model sophistication, especially when coupled with the present schedule for site characterization, does not seem to support such an optimistic view.

2. The State agrees with the staff's response that the Geologic Repository Operations Area design is an iterative process. Thermal

loads are a key component in assessing whether designs meet performance objectives. The State does not agree with the staff's response that the iterative process covers the period of design, construction, and operation. For Yucca Mountain, the iterative process begins with ESF Title 1 design and continues to the final repository design which accompanies the construction license application. The design including the assessment of the effects of thermal loads on the design must be sufficiently mature to meet 10 CFR 60 requirements with reasonable assurance. Construction and operation phases provide confirmation that the design presented in the license application is adequate. As the State understands 10 CFR 60, construction and operation phases are not for iteratively increasing the maturity of repository design.

CAJ:jem

NRC/DOE Technical Exchange On Air
And Vapor Movement Due to Thermal Gradients

March 18, 1992

State of Nevada Comments

A comment by the State of Nevada on the process of Technical Exchanges was presented in its closing remarks. The protocol of the Technical Exchanges is a free and open exchange of technical views by all parties with no positions or agreements reached. The objective is an exchange of information on activities, data gathering, results, interpretations, and conclusions obtained to date. The meeting summary prepared subsequent to the exchange documents for the public record the purpose of the exchange, the agenda, the participants, and the information presented. At the March 18 exchange, some parties for reasons not expressed chose not to submit their information for the public record. As conceived by the Nuclear Waste Policy Act and confirmed in the NRC's 10 CFR 60 regulations, the High-Level Waste repository program is a public-process program. The public has the right to any information discussed between the applicant and the regulator. To insure the "public's right to know" the State requests that all information presented in technical exchanges as visual aids or reports be incorporated in the public record of the exchange.

State of Nevada



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Facsimile Transmission

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