

WM-39/MFW/85/07/01

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MEMORANDUM FOR: File

FROM: Michael F. Weber, WMGT
Division of Waste Management

SUBJECT: NRC PARTICIPATION IN WORKING GROUPS FOR UMTRAP GENERIC
DESIGNS - TAR 85045

The attached memorandum was discussed with Dan Gillen, WMLU, on June 26, 1985, thereby eliminating the need for its transmittal. Prior to its discussion, the memorandum was prepared with the cooperation of staff and management in the Hydrology, Geochemistry, and Geology sections of the Geotechnical Branch.

Enclosure:
As Stated

WM Record File

WM Project: 39

Docket No.

PDR

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WM-39

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DFC :WMGT							
NAME :MWeber:mw							
DATE :85/07/01							

MEMORANDUM FOR: Leo B. Higginbotham, Chief, WMLU
Division of Waste Management

FROM: Malcolm R. Knapp, Chief, WMGT
Division of Waste Management

SUBJECT: NRC PARTICIPATION IN WORKING GROUPS FOR UMTRAP GENERIC
DESIGNS - TAR 85045

TAR-85045 requests the participation of several of my staff in NRC-DOE working groups for the development of a "generic design manual" for UMTRAP sites. Based on our review of the information provided with the request, however, it appears that NRC's participation in the working groups may constitute a conflict of interest. Adherence to the manual could force us to regulate ourselves rather than DOE. To enable me to respond to your request regarding the participation of my staff in the working groups, please provide me with clearer explanations of the goals, descriptions of NRC and DOE roles and responsibilities, and standing rules of the working groups to evaluate whether NRC participation would constitute a conflict of interest.

Independent of my concern about the potential conflict of interest, I would like to discuss with you the following concerns:

- ° Is 40 to 80 hours an accurate estimate of WMGT resources for NRC's participation in the working groups? The TAR requests the participation of M. Weber, T. Johnson, M. Blackford, and J. Valdes. If we do participate in the working groups, I recommend that we include Bill Dam in the Water Resources group. Because we do not know the roles and responsibilities of the NRC staff in the groups, however, I cannot estimate the amount of time required of these five staff persons or evaluate how this project impacts ongoing or planned UMTRA projects within WMGT.
- ° Will working groups consist of staff from EPA, states, tribes, and NRC-URFO in addition to NRC-WM and DOE staff and contractors? If the goal of the working groups is to identify "procedures, methods, and approach for meeting the EPA standards," EPA's participation in the groups would appear advantageous.
- ° Will travel funds be available to sponsor group meetings in New Mexico? The descriptive information included with the TAR proposes working group meetings in Albuquerque, which were not included in planning our travel budget for the fourth quarter of FY85.

In addition to considering the concerns discussed above, I ask you to consider whether the benefits to be gained by developing the "generic design manual"

justify future expenditures of staff and travel resources for this effort. It appears to me that the Standard Review Plans (SRP's) being prepared by NRC staff may provide adequate guidance to DOE for meeting the EPA standards for remedial actions at UMTRAP sites. If they provide adequate guidance, the SRP's may obviate the need for the working groups and the "generic design manual".

Please contact me at your convenience to arrange a meeting where we can discuss my concerns about establishing NRC-DOE working groups for the UMTRAP Generic Design Manual.

DFC	:WMGT	:WMGT	:WMGT	:WMGT	:WMGT	:	:
NAME	:MWeber:mw	:MFliegel	:KJackson	:PJustus	:MKnapp	:	:
DATE	:85/06/	:85/06/	:85/06/	:85/06/	:85/06/	:	: