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Mr. Robert W. Browning
Director, Division of Waste Management
U.S. Nuclear Division Regulatory Commission
Washington, D.C. 20555

Dear Mr. Browning:

The U.S. Department of Energy (DOE) has reviewed the Nuclear Regulatory Commission (NRC) Draft Generic Technical Position (GTP) on Design Information Needs in the Site Characterization Plan, February, 1985. We appreciate the opportunity to review this critical NRC document in draft. Our comments (Attachment A) are directed at identifying modifications which we believe will eliminate any residual potential areas of confusion or ambiguity between this position and the Annotated Outline for the SCP Conceptual Design Report (OGR/B-6), and the appropriate section of the Annotated Outline for Site Characterization Plans (OGR/B-5), which have been developed in consultation with your staff.

As stated in the Forward of the attached Annotated Outline for the SCP Conception Design Report, May 1985 (Attachment B), DOE considers that this Annotated Outline meets the intent of the draft February 1985, GTP and the philosophy contained therein. We feel this statement still applies if the modifications we propose are implemented.

DOE believes that with the conclusion of the effort on this GTP, a high priority should be given to the publication of Reg. Guide 2.6, Format and Content Guide for the Repository License Application. If NRC could define within this document what they require in the License Application Design, this along with the completed position on the SCP design information would significantly strengthen our mutual understanding of the design scope and requirements.

We would be pleased to discuss these comments with you as appropriate prior to your finalization of the GTP. If you should have any questions on this matter, please let me know.

Sincerely,

Ralph Stein

Ralph Stein, Director
Engineering and Licensing Division
Office of Civilian Radioactive
Waste Management

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Enclosures

ATTACHMENT A .

COMMENTS ON NRC DRAFT GENERIC TECHNICAL
POSITION ON DESIGN INFORMATION NEEDS IN THE SITE
CHARACTERIZATION PLAN

1. In Section 3.0, Discussion of Design Information Needs for the SCP on page 4, the last two sentences of this paragraph should be rewritten as follows:

"Identification of design issues which will require site specific characterization is needed to evaluate testing needs at the time of SCP submittal. All of the design details need not be contained in the SCP, but the documents containing sufficient design information to establish site characterization needs should be referenced and made available to the NRC at the time the SCP is submitted."

The original first sentence implied NRC needing a list of design issues prior to the SCP. Deleting the word early in this sentence does not change the basic requirement. The SCP Conceptual Design supporting document that will be referenced is being produced at the same time as the SCP design chapter. Therefore, they both should be provided to the NRC at the same time.

2. In Section 3.1.2 "Structures, Systems, and Components Important to Safety" 60.131.b on page 5, the last sentence should be rewritten as follows:

"If a system is determined to be important to safety a careful assessment must be conducted to establish what, if any, site characterization data are needed to properly design the system, considering 10 CFR 60.131.b requirements, to avoid or mitigate off-site radiation problems."

It is not believed that a listing of 10 CFR 60.131.b requirements is necessary as referencing them should be sufficient.

3. In Section 3.3 Addition Design Criteria for the Underground Facility (10 CFR Part 60.133, the last two sentences) beginning with "A discussion of . . ." should be replaced with the following:

"Potential events (e.g., Water inflow, earthquake, rock burst, etc.) which would disrupt operations or compromise the repository's integrity should be identified in the SCP along with the present site data that addresses these considerations. Data needed to better quantify the risks involved should be defined."

It is believed the above is a clearer presentation of what is needed to satisfy these concerns.

4. In Section 3.4 Design of Seals for Shafts and Boreholes (10 CFR 60.134) on page 6, second sentence should be rewritten as follows:

"Performance requirements for shaft and borehole seals, should be defined and justified. How the seal designs fulfill these requirements should then be discussed."

It is believed this is a clearer statement of the process required to validate the seal design.

5. In Section 3.6 Design Process for the SCP on page 7 delete the first two paragraphs and replace with:

"The design of the repository operations area must be in sufficient detail to establish what site characterization data are needed. (Full analysis and justification of the design will occur during the review of the PSAR in the License Application.) Alternative designs which are currently being considered to accommodate (a) uncertainties in site parameters; (b) site properties which may vary within the developed area; and (c) local unacceptable conditions which could reasonably be expected to be encountered, should be discussed. In addition, alternative designs being considered which may require different types or accuracy of the data should be discussed."

6. In the total document the title and text references vary from "60.131.a" to "10 CFR 60 Part 132" to "10 CFR Part 60.2". These should be made consistent throughout the document.

7. Restate first sentence in 3.7 as follows:

"The design presented in the SCP should identify and allow for uncertainties at the conceptual level in the site parameters . . ."

The basis for this comment is that we may not have conceptual design for all the components, systems, at the time of SCP submittal.

8. In item 3.5, at the end of the second sentence, add:

" . . . , of any radionuclide released at a rate greater than 0.1% of the calculated total release rate limit."