



Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221

NOV 08 1994

Don Hancock
Director, Nuclear Waste Safety Project
Southwest Research and Information Center
P. O. Box 4524
Albuquerque, NM 87106

Dear Mr. Hancock:

Thank you for your recent letters of September 20 , October 17 and 25, 1994. I had anticipated that the Systems Prioritization Method (SPM) meeting of September 28-29, 1994, answered your concerns, especially my comments and Mr. Bills' comments, regarding the short time available. In the event you have not received a copy of the transcript, I said: "This is an iterative process. If you found yourself short of time... All your comments don't have to be in today on the issues... those can come whenever you have them and they will be addressed." Mr. Bills also stated, "If you go back and three weeks from now have a concern, please write it. We'll gladly address it..." On October 20 and 21, 1994, I received stakeholder comments on the Scenario and Salado position papers. As I have promised, my staff and Sandia National Laboratories are actively addressing these comments.

If you have not had time to fully research the position papers, feel free to come to the SPM meeting and ask questions. Then you may return to your office and after thinking about our answers, write down any concerns you may have and mail them to me.

As you know, I am committed to meaningful stakeholder input to the SPM process. Even if concerns are raised too late to go into the second iteration of the SPM, they will be addressed. I will meet my earlier commitment that all stakeholder concerns will be addressed prior to any final compliance application submission.

With regard to your concern that the position papers do not explicitly discuss the implications for performance assessment (PA) of the various competing models, that activity would require that we prejudge the results of the PA and SPM. I have painstakingly avoided prejudging these results. I assure you that any concerns that you raise will not be prejudged either, but will be placed into the SPM process after full initial research has been accomplished on them.



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Your concern that the papers are not complete is, I believe, proof of our sincerity in desiring stakeholder input. If the documents were final, there would be no reasonable chance for addressing stakeholder concerns. Only by sending out documents that are still in preparation can I ensure that stakeholder involvement occurs at the earliest possible moment. These papers will be reissued as necessary until the final compliance application is prepared. With each revision, you will have an opportunity to comment on the paper and ensure that your concerns have been addressed.

I cannot agree with your conclusion of October 17, 1994, that it is time to either change the schedule of the SPM process or abandon it to retreat to the Experimental Program Plan to prepare a new PA. The SPM process uses the PA codes and thus is a new PA. The main difference is that the SPM uses data that fully exists today and attempts to give stakeholders a voice in the process.

I regret that you were not able to attend the October 27-28, 1994, SPM meeting, because we do value your participation and input as well as that of other stakeholders. Remember the timelines for submission of specific concerns are not restricted to the SPM topical meeting schedule.

I hope that this information addresses your concerns and that you reconsider your decision not to attend or participate in the SPM process.

Sincerely,


George E. Dials
Manager

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cc:

B. Neill, EEG
C. Wentz, NMEM&NR
B. Garcia, NMED
B. Russo, EPA
G. Harris, CARD
L. Bird, WIN
L. Lovejoy, NMAG
J. Rolland, PSR
K. Sabo, CCNS
J. Montes, NM Alliance
I. Aeby, NM Alliance
J. Heaton, Carlsbad
A. Kubo
M. McFadden, CAO
J. Mewhinney, CAO
P. Sallani, CAO
P. Davis, SNL

Barbara
Stevie Z
Wipp file
Chucha