

The

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## CHANGE IN 2nd REPOSITORY DEADLINES REQUIRES LEGISLATION SAYS COUNSEL

In response to an August 21, 1986 request from House Interior Chairman Morris K. Udall asking for a copy of what was initially explained as an already existing legal memorandum, Secretary Herrington has forwarded to the Arizona Congressman a recently written DOE counsel opinion stating that the provisions of the Nuclear Waste Policy Act (NWP) "requir[ing] recommendations concerning a second repository are not themselves supplanted by an amendment to the Mission Plan required by Section 301 of the Act." This contrasts with the view voiced by OCRWM Director Rusche at recent Congressional hearings. He has maintained that DOE was complying with the NWP by including in a revised Mission Plan DOE's decision to indefinitely delay the second repository program.

The legal opinion was forwarded to Mr. Udall on September 9, with a cover letter from the Secretary explaining that he had misunderstood the Interior Chairman's question (See **Legal Opinion in the HLW Focus**)

## NO SURPRISES, NC DESIGNATED AS HOST FOR 2nd SE LLRW SITE

On September 11, the Southeast Compact Commission, by a vote of 14-2, designated North Carolina as the state to host the second Southeast regional LLRW disposal facility. The designation followed the Commission's acceptance of Dames & Moore's technical report on the state rankings on Wednesday, September 10. The two North Carolina Commissioners voted in opposition to the designation. Prior to the vote NC officials, tried in vain to convince the Commission to accept a waste volume projection scenario that would have resulted in Georgia being designated as the top ranked state.

NC Commissioner Captain Bill Briner, an Associate Professor at the Duke Medical Center, reported that the Commission listened to the new data presented by the state but was not convinced. When asked about his personal view of whether North Carolina would pull out of the agreement he replied that in his view the state should stay in. (See **North Carolina** pg. 2)

(North Carolina from pg. 1)

### **Future Of NC Uncertain**

Captain Briner expressed a high degree of uncertainty as to what future activities could occur in North Carolina following the State's designation. The biggest unknown is what the legislature will do when it reconvenes. A bill to revoke the State's membership in the compact remains under active consideration and will surely be one item on the top of the upcoming legislative agenda.

### **NC Data Supported Designation ?**

Though the Commission did reject a new volume projection scenario presented by North Carolina for the first time at the Atlanta session, the two South Carolina Commissioners stated that they voted in favor of the North Carolina designation based on the comprehensive volume projection data developed by North Carolina Governor's Science Advisor Dr. Earl MacCormac and forwarded to all the Commissioners for their review on August 14. Of the nine volume projection scenarios provided by Dr. MacCormac, six ranked North Carolina as the top candidate host state.

This particularly impressed SC Commissioner, Dr. John Stucker, who in casting his vote with the majority, stated that he was doing so, "based largely on the information submitted to the Commissioners in the August 14 letter by Dr. MacCormac on behalf of North Carolina." From reports received from others at the session, Commissioner Stucker's citing of Dr. MacCormac's data as supporting the designation of North Carolina was not taken lightly. \*\*

### **NRC RELEASES BRC POLICY AS FINAL RULE**

A week or two before even the NRC staff expected action, the NRC Commissioners approved and released without public hearing the staff-developed Below Regulatory Concern Policy Statement which sets out the manner in which the Commission will handle petitions for rulemaking to exempt

specific waste streams from disposal in licensed LLRW facilities.

Though the Commission Policy Statement issued as a final rule in the August 29 **Federal Register** (FR, Vol. 51, No. 168, Pg. 30839) does not differ significantly from the earlier reported staff recommendations, the Commission did direct the staff to prepare a generic rulemaking on BRC waste stream exemptions and issue an Advanced Notice of Proposed Rulemaking (ANPR) within ninety days of the issuance of the Policy Statement.

### **Petitions Acceptable Now**

According to the NRC staff and the FR notice, the Commission's decision to proceed with a generic rulemaking was made in order to assure full compliance with the provisions of the Low Level Radioactive Waste Policy Amendments Act. This does not mean that action on petitions for BRC exemptions submitted according to the policy statement guidelines will not be accepted until the rulemaking is completed. Petitions can be submitted and will be processed according to the policy statement guidelines while the generic rulemaking is underway.

### **Intended for Generic Waste Streams**

As stated in the notice, the policy establishes guidelines for the expeditious handling of BRC petitions for rulemaking for waste streams from "multiple producers." Individual licensees seeking approval for disposal of "unique waste streams" are directed to submit disposal plans under 10CFR 20.302(a)

### **Qualification Criteria**

The statement lists fourteen criteria against which BRC petitions will be judged in order to determine whether the waste streams are suitable for expedited BRC action. These fourteen criteria are:

1. Disposal and treatment of the wastes as specified in the petition will result in no significant impact on the quality of the human environment.

2. The maximum expected effective dose equivalent to an individual member of the public does not exceed a few millirem per year for normal operations and anticipated events.
3. The collective doses to the critical population and general population are small.
4. The potential radiological consequences of accidents or equipment malfunction involving the wastes and intrusion into disposal sites after loss of normal institutional controls are not significant.
5. The exemption will result in a significant reduction in societal costs.
6. The waste is compatible with the proposed treatment and disposal options.
7. The exemption is useful on a national scale, i.e., it is likely to be used by a category of licensees or at least a significant portion of a category.
8. The radiological properties of the waste stream have been characterized on a national basis, the variability has been projected, and the range of variation will not invalidate supporting analyses.
9. The waste characterization is based on data on real wastes.
10. The disposal form of the waste has negligible potential for recycle.
11. Licensees can establish effective, licensable, and inspectable programs for the waste prior to transfer to demonstrate compliance.
12. The offsite treatment of disposal medium (e.g., sanitary landfill) does not need to be controlled or monitored for radiation protection purposes.
13. The methods and procedures used to manage the wastes and to assess the impacts are no different from those that would be applied to the corresponding uncontaminated materials.
14. There are no regulatory or legal obstacles to use of the proposed treatment or disposal methods.

#### **Agreement State Involvement**

The Agreement States are to play "an important role in ensuring that the system [the BRC rulemaking process] works on a

national basis and that it remains equitable." The policy specifies that "rulemaking granting petitions will be a matter of compatibility for Agreement States," and thus rulemaking will be coordinated with the states.

#### **The Generic Rulemaking**

When contacted by the EXCHANGE, NRC waste management staff explained that the current intent with regard to the Commission's direction to proceed with a generic rulemaking is to develop a list of questions for the ANPR addressing various aspects of the guidelines and procedures included in the policy statement. At this time staff does not intend to develop a generic rule outlining a specific course of action to be followed by petitioners. \*\*

#### **CANADIAN FIRM BUYS NUS PROCESS SERVICES**

SNC, a Canadian engineering firm (with revenues in excess of \$150 million) headquartered in Montreal and parent company of London Nuclear, is purchasing Columbia, S.C.-based NUS Process Services Corporation (NUSPSC). The purchase is expected to be completed by September 30, 1986. The end result will be that London Nuclear and NUSPSC will be melded into one company, LN Services, with headquarters in Columbia, South Carolina. Gerry Motl, the President of NUS, reported to the EXCHANGE that the resulting union will provide a "synergy" that will be an overall advantage in the very competitive LLRW processing market. He remarked that with London Nuclear's funnel to Canadian waste technology the newly formed company will be able to offer a broad range of expertise to U.S. waste generators.

#### **Officers, Sale Price**

The President of the new company will be Eric LeSurf. Bob Hemmings will be the VP for operations, and Mr. Motl the VP for business development.

Last year London Nuclear had revenues of four million dollars with NUS reaching six million. The purchase price for NUSPSC is rumored to be in the neighborhood of \$8 million, but Gerry Motl would not confirm the amount. \*\*

# Wrap Up (LLRW)

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## IN NEW ENGLAND

**Rhode Island** has ratified compact legislation that establishes a two-state compact with **Massachusetts**. A similar bill has not been introduced in the Massachusetts legislature.

**Maine** wrote to the Northeast Compact Committee inquiring as to the possibility of negotiating a contract to dispose of Maine's waste at Hanford. The Committee rejected the initiative with members commenting that it would undermine the basis and intent of the regional compacts.

## IN THE CENTRAL MIDWEST

In **Illinois**, the designated host state for the Illinois-Kentucky Central Midwest Compact, Dr. Terry Lash, Director of the State's Department of Nuclear Safety, informed the EXCHANGE that the state's Geological survey has completed and submitted to his Department three LLRW disposal facility siting reports as required under state law. The first was a mapping of suitable geological regions within the state; the second a review of proposed siting criteria; and the third a description of how a proposed site would be characterized against proposed siting criteria.

Dr. Lash explained that activities were already underway with the State LLRW Citizen's Advisory Group to develop a siting plan. The intent is to complete a preliminary draft of the plan by January, 1987. The plan is to include details on public hearing procedures, host community incentives and rights, and site monitoring plans.

Under the State's siting procedures a private contractor is to be designated to identify possible locations for the regional disposal facility. The Department Director reported that the contractor is scheduled to be selected in early '87, with the contractors site location recommendations report to be completed by late '87. The selection of the three or four sites to be characterized is to be made in early 1988.

In order to carry out the Department site selection activities, Dr. Lash has acquired the services of **Eric Schwing**, who was formerly with the Michigan Department of Health, and **Dr. Michael Momeni** from Argonne Laboratory. Eric will be the DNS staff attorney. Dr. Momeni has considerable technical expertise in the preparation of Environmental Impact Statements and will be directly involved in final LLRW disposal site selection-EIS process.

## IN TEXAS

Patiently but surely, the Texas LLRW Authority is again progressing toward the naming of a site for a state-only LLRW disposal facility. Lee Matthews of the Authority staff reports that the target date for selection of the two "final" sites is scheduled for November of this year with the final site selection occurring in May 1987. Three sites are currently under consideration. All are in Hudspeth County. The "final" sites will be selected from this group of three.

Lee reported that a Below-Regulatory Concern petition that would allow specific LLRW streams to be disposed of in a sanitary landfill has been submitted to the State's regulatory agency, the Department of Health. In addition, the Authority staff is developing draft legislation that would establish an impact assistance and financial incentives program for the community that would host the LLRW disposal facility.

According to Mr. Matthews, the Authority has also decided to design the state LLRW disposal facility to meet both RCRA and NRC requirements to forestall any future problem that could arise because of the as-yet-unresolved NRC-EPA jurisdictional conflict over the regulation of mixed waste.

## ON MIXED WASTE

**EPA** and **NRC** staff are reporting that substantial progress has been made toward resolving the long lived interagency jurisdictional conflict over the regulation of mixed waste (RCRA-Hazardous waste and LLRW). NRC staff is expected to submit a report to the Commission that will include

recommendations on a final course of action necessary to resolve the current jurisdictional conflicts on September 30. From lengthy discussions with EPA and NRC staff it seems very unlikely that the staff will recommend legislation to reach a solution.

Though EPA will not be able to issue locational siting standards for disposal facilities for RCRA-designated waste any sooner than initially predicted (9/88), there appears to be enough of an agreement between the two agency staffs to lead one EPA staffer to comment that it would be highly unlikely that EPA RCRA locational standards would "submarine" any NRC LLRW disposal facility requirements. However, EPA is giving no concrete guarantee that this could not occur, allowing that the Agency requirements will be developed after a comprehensive rulemaking involving extensive public input.

There has been one significant change in the joint actions that were planned to be taken by the agencies. Earlier both staffs had indicated that a joint guidance document would be developed with regard to the disposal of mixed waste. The plan to issue this joint guidance document has been scrapped by mutual agreement. Both agencies' staff emphasized that the decision not to release such a document is in no way indicative of a major disagreement on moving toward an administrative resolution of the jurisdictional conflict.

#### **IN THE DOE**

Dr. David Rossin was sworn in as Assistant Secretary for Nuclear Energy on August 16, 1986. Dr. Rossin's responsibilities include remedial action and waste technology activities. He was formerly the Director of the Nuclear Safety Analysis Center at the Electric Power Research Institute (EPRI) in Palo Alto, California.

#### **IN THE INDUSTRY**

Duratek Corporation (DRTK-OTC), a subsidiary of national Patent Development Corp. (NPD-AMEX/PSE) has been awarded a contract to process low-level nuclear

waste water at the Maine Yankee Atomic Power Station, operated by the Maine Yankee Atomic Power Company of Augusta, Maine. Duratek has installed an Enhanced Volume Reduction (EVR) Processing System at the single unit, 825-megawatt reactor in Wiscasset, Maine. Duratek's system can use either the company's new Durasil technology or conventional ion exchange resins. Maine Yankee will be the first New England utility to install an EVR System. Duratek has installed full-service units at Public Service Electric & Gas Co.'s Salem Plant in New Jersey, the New York Power Authority's Indian Point 3 Station, Virginia Power Co.'s North Anna Power Station, and Florida Power & Light's Turkey Point Plant. A system will soon be operational at the Donald C. Cook Nuclear Power Plant in Bridgman, Michigan. Duquesne Light Company's Beaver Valley Plant and Toledo Edison's Davis-Besse Plant have each purchased an EVR System.

The **Electric Power Research Institute (EPRI)** has awarded a contract to **NUSPSC** to perform a study entitled "Low-Level Radwaste Disposal - A Look at Six Burial Sites". The basic purpose of the study is to describe what went right at the three sites currently operating and what went wrong at those that are now shut down. In addition, regulations existing at the time of initial site licensing will be compared to the current 10 CFR 61 requirements. The study is scheduled for completion later this year.

**NUS Process Services Corporation (NUSPSC)** just completed a successful liquid abrasive decontamination project at the Rochester Gas & Electric Ginna Station. The LADS unit, which was positioned on-site at Ginna since January, was used to decontaminate various scrap metal, scaffolding, tools, and chainfalls. The equipment is now available for reassignment.

**Waste Management Inc.**, the parent company of **Chem Nuclear** and **Chemical Waste Management** has undergone some structural reorganization. Chem Waste has also filed with the Securities and Exchange Commission to issue a public offering of up to 19-20 percent of their stock. Under the

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restructuring Chem Nuclear will apparently become a subsidiary of Chemical Waste so the proposed stock offering would include Chem Nuclear. The SEC registration was filed on September 5th.

#### ON THE MOVE

**David A. Zigelman** has been appointed Director of marketing and projects for Westinghouse Hittman Nuclear, Inc. In his new assignment, Dave will be responsible for all marketing and sales activities and customer liaison with commercial nuclear power plant operators.

**Dr. Ralph R. DiSibio** has been named Director

of Westinghouse's Advanced Power System Division's newly created Value Ventures unit. Dr. DiSibio will be responsible for managing external ventures and investments related to business development and diversification and will coordinate this activity with the divisions to ensure mutual benefit from joint ventures, licenses and other business arrangements. As appropriate, and in conjunction with the APSD divisions, Value Ventures will serve as the focal point in the management of new enterprises that may be added to the division portfolio at a later time. Dr. DiSibio was most recently the Manager of Business Development for the Advanced Power Systems Division. \*\*

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#### REPORTS OF NOTE (LLRW)

**Survey of Statistical and Sampling Needs for Environmental Monitoring of Commercial Low-Level Radioactive Waste Disposal Facilities** (NUREG/CR-4162); Division of Radiation Programs and Earth Sciences, Office of Nuclear Regulatory Research, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. This document presents the results of Task 1 of a project entitled "Application of Statistics in Siting and Managing Commercial Low-Level Radioactive Waste Disposal Sites." Task 1 was designed to develop guidance for determining the overall needs for sampling and statistical work in characterizing, surveying, monitoring, and closing commercial low-level waste sites. The overall project is designed to produce information for developing guidance on implementing 10 CFR Part 61.

Results are listed in the Executive Summary and areas requiring additional investigation are discussed. If cost-effectiveness and statistical reliability are considered of prime importance, then double sampling, compositing, and stratification (with optimal allocation) are identified as key issues for NRC's consideration. Alternatively, if the principle concern is avoiding questionable statistical practices, then the applicability of kriging (for assessing spatial pattern), methods for routine monitoring, and use of standard textbook formulae in reporting monitoring results should be reevaluated. Other important issues are identified in the report. Copies available from: The NRC Public Document Room, 1717 H Street, N.W., Washington, D.C. 20555; Superintendent of Documents, U.S. Government Printing Office, P.O. Box 37082, Washington, D.C. 20013-7082 or The National Technical Information Service (NTIS), Springfield, VA 22161.

**Corrective Measures Technology for Shallow Land Burial at Arid Sites: Field Studies of Biointrusion Barriers and Erosion Control** (LA-10573-MS); Los Alamos National Laboratory, Los Alamos, New Mexico 87545. This report summarizes the field research program at LANL involving corrective measures technologies for arid shallow land burial (SLB) sites. Results of field testing of a biointrusion barrier installed at a close-out waste disposal site (Area B) at Los Alamos are presented. Soil erosion and infiltration of water into a simulated trench cap with various surface treatments were measured, and the interaction between erosion control and subsurface water dynamics is discussed relative to waste management.

(Legal Opinion from pg. 1)  
at the July 31 Hearing (See EXCHANGE, Vol. 5, No. 13) when he (the Secretary) said that the Department already had a written legal opinion regarding the legality of the Department's action to delay the second repository program.

The opinion provided to Mr. Udall is dated September 5, 1986, and was forwarded to Mr. Ben Rusche from General Counsel Michael Farrell.

#### **Inclusion In Mission Plan Justified**

The opinion provided by Mr. Farrell does argue that OCRWM was within the law in determining that the Mission Plan was a vehicle through which Congress should be informed of "significant matters, including new information relating to the conduct of the second repository program." It points out, however, that the provision of the Act requiring "recommendations regarding the [second] site in 1989 and 1990...remain intact until repealed, amended, or supplanted by new legislation...."

In the words of the General Counsel, "harmonizing" the elements of the NWPA regarding the Mission Plan and the second round recommendation "would entail treatment of matters such as the second repository in the Mission Plan with a view to consideration of appropriate new additional legislation by Congress."

OCRWM management staff are not offering any reaction to the legal opinion, other than saying that an amended version of the Mission Plan is being prepared and will be submitted to Congress in October.

#### **RECOMMENDATION ON DEFENSE HLW FEE THROUGH CONCURRENCE (ALMOST)**

DOE's recommendation on Defense Program's contribution to the Nuclear Waste Trust Fund is finally on its "final" concurrence go-around with the Department. Though this is about the second or third time the recommendation has been on this track, staff is confident that this is the last. The proposed recommendation should be released to the **Federal Register** before the end of this month.

DOE Defense and Military Applications offices have already concurred. Notification of concurrence has not yet been received from the Office of Management and Budget but is expected within the week.

The proposed recommendation does not differ significantly from what has been reported in the past. However, rather than specifying an absolute dollar amount, it projects the potential range of the Defense contribution. The range was developed by estimating costs based on the different media that could be chosen as the site of the repository and other factors that are taken into account in the methodology proposed to calculate the contribution.

The proposed methodology used to calculate the Defense contribution maintains its two-part structure -- one, a calculation of the defense contribution to the overall repository costs; the other, a calculation for the incremental costs directly attributed to combining defense wastes with commercial wastes in a single repository.

When the methodology is used assuming

current program scenarios the Defense contribution is said to come out to be somewhere between \$4 and \$4.5 billion dollars.\*\*

#### **UNEXPENDED FY86 FUNDS FOR HLW PROGRAM BETWEEN \$100-200 MILLION**

Though the final funding provided by the Congress to support the high-level waste program in FY87 will be well below the \$750 million + requested by DOE (probably somewhere near \$500 million), FY87 HLW program activities may not have to be curtailed to any great degree. According to information obtained by the EXCHANGE, the OCRWM is said to have somewhere between \$200-225 million in unexpended funds for FY86 that will be available for carryover to FY87. DOE officials contacted by the EXCHANGE maintain that the carryover is much lower, nearer \$125 million, but other sources contend that \$200 million is about right. \*\*

#### **WASHINGTON STATE ISSUES RFP FOR HLW REPOSITORY IMPACT STUDY**

The State of Washington has issued a Request for Proposals from outside contractors to complete a "Report on Social and Economic Impacts of a Potential High-Level Nuclear Waste Repository" at the DOE-proposed Hanford site.

The projected time period for completion of the report is 43 months. Funding for the effort is contingent upon obtaining a grant from DOE. The RFP does not put a dollar amount on the contract's value, but it is pointed out that similar work conducted by contractors in other potential repository states ended up costing between "two and four million dollars."

#### **Highlights of Scope of Work**

The objectives of the socioeconomic impact study as listed in the RFP are as follows:

- o Develop factual bases for informed decisions on the repository, and prepare the State and localities for subsequent negotiation or legislation.

- o Encourage public and local government participation in defining impacts, risks and compensation needs.
- o Evaluate impacts of commercial and defense waste activities at all stages of repository development.
- o Identify the full range of impacts which the State, local governments, business enterprises or citizens might incur, as the basis for mitigation or compensation claims.
- o Avoid adverse impacts where possible, obtain full and timely mitigation where impacts are not avoidable, and obtain compensations, if appropriate, for any impacts that are not mitigable.
- o Ensure equitable distribution of impact payments among affected governments.
- o Maximize potential benefits from repository development activities.
- o Minimize risks and results of possible accidents.
- o Obtain full federal responsibility for social and economic costs and damages resulting from accidents.

Specific details on contractor tasks to be completed in order to meet these objectives are detailed in the RFP. As stated in the cover memo accompanying the announcement:

"Proposals will be evaluated on the basis of the qualifications, experience, and demonstrated ability of the proposer to conduct a technically superior study, and on the quality of the study design that is submitted. The state is not interested in "boilerplate" or "off-the-shelf" proposals. The final study must combine the ability to meet the most rigorous standards of scientific peer review with relevance to the policy needs of the state and its local governments."



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## Procurement Contact

For a copy of the RFP contact **Jerry Parker** at **(206) 459-6678**. Proposals are due by 12 Noon, Pacific Time, on Thursday, October 30, 1986. \*\*

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## REPORTS OF NOTE (HLW)

**ERG REVIEW OF CONTAINMENT FAILURE PROBABILITY AND REPOSITORY FUNCTIONAL DESIGN CRITERIA** (BMI/ONWI-608); June, 1986; Office of Nuclear Waste Isolation, Battelle Memorial Institute, 505 King Avenue, Columbus, OH 43201-2693. The Engineering Review Group (ERG) was established by the Office of Nuclear Waste Isolation (ONWI) to help evaluate engineering-related issues in the U.S. Department of Energy's nuclear waste repository program. The June 1984 meeting of the ERG considered two topics: (1) statistical probability for containment of nuclides within the waste package and (2) repository design criteria. This report documents the ERG's comments and recommendations on these two subjects and the ONWI response to the specific points raised by ERG.

**Salt Dissolution and Collapse at the Wink Sink in West Texas** (BMI/ONWI-598); June 1986, prepared for Office of Nuclear Waste Isolation, Battelle Memorial Institute, 505 King Avenue, Columbus, OH 43201-2693. The Wink Sink, in Winkler County, Texas, is a collapse feature that formed in June 1980 when an underground dissolution cavity migrated upward by successive roof failures until it breached the land surface. The original cavity developed in the Permian Salado Formation salt beds more than 1,300 feet below ground level. Natural dissolution of salt occurred in the vicinity of the Wink Sink in several episodes that began as early as Salado time and recurred in later Permian, Triassic, and Cenezoic time. Although natural dissolution occurred in the past below the Wink Sink, it appears likely that the dissolution cavity and resultant collapse were influenced by petroleum production activity in the immediate area. Drilling, completion, and plugging procedures used on an abandoned oil well at the site of the sink appear to have created a conduit that enabled water to circulate down the borehole and dissolve the salt. When the dissolution cavity became large enough, the roof failed and the overlying rocks collapsed into the cavity. Similar collapse features where underground salt beds have been intentionally dissolved during solution mining or accidentally dissolved as a result of petroleum production activities.

**Preliminary Analyses of Scenarios for Potential Human Interference for Repositories in Three Salt Formations** (BMI/ONWI-553), Office of Nuclear Waste Isolation, Battelle Memorial Institute, 505 King Avenue, Columbus, OH 43201-2693. Preliminary analyses of scenarios for human interference with the performance of a radioactive waste repository in a deep salt formation are presented. The following scenarios are analyzed: (1) the U-Tube Connection Scenario involving multiple connections between the repository and the overlying aquifer system, (2) the Single Borehole Intrusion Scenario involving penetration of the repository by an exploratory borehole that simultaneously connects the repository with overlying and underlying aquifers, and (3) the Pressure Release Scenario involving inflow of water to saturate any void space in the repository prior to creep closure. The methodology to evaluate repository performance in these scenarios is described and this methodology is applied to reference systems in three candidate formations: bedded salt in the Palo Duro Basin, Texas; bedded salt in the Paradox Basin, Utah; and the Richton Salt Dome, Mississippi, of the Gulf Coast Salt Dome Basin.

