



Council of Energy Resource Tribes

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November 5, 1987

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Mr. James E. Kennedy
U.S. Nuclear Regulatory Commission
High-Level Waste Management
Operations Branch, QA Section
Washington, DC 20555

Subject: Review of Final Draft Generic Technical Position on
Items and Activities in the high-Level Waste Geologic
Repository program Subject to Quality Assurance
Requirements

Acoma Pueblo
Cherokee
Jicarilla Apache
Oglala Sioux
Standing Rock Sioux

Dear Mr. Kennedy:

Board Members:

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Cheyenne River Sioux
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Seminole of Florida
Shoshone - Bannock
Southern Ute
Spokane
Tule River
Turtle Mountain Chippewa
Umatilla
Ute
Walker River
Zia Pueblo

The Council of Energy Resource Tribes has reviewed the above-referenced GTP for the Confederated Tribes of the Umatilla Indian Reservation and the Nez Perce Tribe of Idaho. The changes in the line-in, line-out version closely correspond to the notes that we kept of the discussions at the August 25 meeting in Bethesda. A few typos were found, such as the use of "analysis" instead of "analyses" in the first full paragraph on page 7 and the confusing lack of a period after "safety" under 4.2 (d), "Retrieval Process".

The only significant change that is needed is the statement on page 24 that "The following example[s] of how grading can be accomplished are helpful in interpreting the guidance given above." The two examples given in the original document were then deleted. Either this sentence should be deleted, or the "are" should be changed to "is" and the single example under discussion should be clearly identified, not just included as part of the discussion of graded QA.

We appreciate your having allowed additional changes at the August 25 meeting and believe that the changes have clarified the GTP without compromising NRC's regulatory position.

Sincerely,

Stephen S. Hart
Project Engineer

SSH/kg

Executive Director:

A. David Lester

cc: Ron Halfmoon, Nez Perce Tribe
Bill Burke, CTUIR

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WM Project: WM-1

PDR yes

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WM Record File: 108.1

LPDR yes

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PDR WASTE

WM-1

PDR

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108.1

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Docket No.

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