

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

TRIP REPORT  
October 25, 1990

SUBJECT: CNWRA Discussions with NRC Regarding LSS Technical Data  
(Account No. 20-3705-001)

DATE AND PLACE: October 1-2, 1990  
NRC Headquarters, White Flint, Maryland

AUTHOR (S): Rawley Johnson, Steve Young, Charles Acree

DISTRIBUTION:

<u>CNWRA</u>	<u>NRC</u>	<u>LSSA</u>
J. Latz	S. Mearse	C. Cameron
Directors	J. Funches	B. Shelburne
Element Managers	B. Stiltenspole	
S. Young	S. Fortuna	
C. Acree		

9011080180 901031  
PDR WASTE PDC  
WM-11

Delete all dist. except CF,  
PDR/LPDR & NUDOC-FT

WM-11  
426.1  
NH15

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

---

TRIP REPORT

SUBJECT: CNWRA Discussions with NRC Regarding LSS Technical Data

DATE AND PLACE: October 1-2, 1990  
NRC Headquarters, White Flint, Maryland

AUTHOR (S): Rawley Johnson, Steve Young, Charles Acree

PERSONS PRESENT:

CNWRA

R. Johnson  
S. Young  
C. Acree

NRC

P. Altomare  
S. Fortuna  
S. Scott  
S. Treby  
J. Randall  
D. Chery  
J. Voglewede  
J. Hoyle  
B. Stiltentpole

BACKGROUND AND PURPOSE OF TRIP:

The purpose of this meeting was to provide an opportunity for representatives of the Nuclear Regulatory Commission (NRC) to explain the NRC's production and use of technical data to representatives of the Center for Nuclear Waste Regulatory Analyses (CNWRA). The CNWRA has been engaged by the Licensing Support System (LSS) Administrator (LSSA) to resolve ambiguities pertaining to the term "technical data," to identify organizations generating it, to document existing plans for providing access to it, and to prepare a plan for implementing related requirements of the LSS Rule.

SUMMARY OF PERTINENT POINTS:

The CNWRA told the NRC that it would be briefing the LSS Advisory Review Committee (LSSARP) the following week on the handling of technical data within the LSS. The CNWRA summarized its findings to date, resulting from prior conversations with the Department of Energy's (DOE) Yucca Mountain Project Office (YMPO) and with a representative of the State of Nevada. It explained that the term "technical data" had become problematic. To the DOE and others it meant all data relating to HLW technical activities, but the CNWRA was using it as a convenient way to describe documentary material which cannot be entered into the LSS in text-searchable form (the focus of its task in behalf of the LSSA). To avoid confusion, the CNWRA and NRC agreed to talk strictly in terms of "non-text-

searchable material." The CNWRA explained, to the best of its ability, the YMPO's intended use of packages to collect and describe this material.

The NRC clarified that:

1. The NRC and its contractors (including the CNWRA itself) have produced non-text-searchable material in the past and will continue to do so in the future.
2. Currently, the NRC employs an automated index, called NUDOCS, which provides reference to NRC central record/document holdings.
3. When the LSS becomes operational, the NRC will submit its documents to the LSS through its existing Document Control Center. While the NRC will retain its microfilm records and index, as federally mandated, NUDOCS will cease to exist as a separate system - thereby eliminating duplication of data bases between it and the LSS.
4. The NRC has not budgeted, within its five-year plan, for an LSS capture station of its own. When LSS loading begins, the NRC will centrally submit its non-text-searchable material to the LSSA for entry into the LSS, in accordance with procedures to be established by the LSSA (after the CNWRA makes its recommendations on this matter). Additionally, the NRC will create LSS headers for this non-text searchable material, in accordance with LSSA guidance (after the CNWRA makes its recommendations).
5. The location of non-text-searchable material which also happens to be non-imageable must somehow be identified in the LSS bibliographic header. The NRC intends to provide a central NRC point of contact to furnish this type of documentary material to requestors (in generally the same way that the YMPO intends to furnish it).

The NRC said that it was unable to comment on the adequacy of using a single bibliographic header for each DOE Data-Record Package as a whole (rather than sub-dividing it with separate headers) without further clarification of DOE procedures for creating a package -- including package composition, scope, assembly, and timing for submittal to the LSS.

The NRC did not recall any agreement by the LSS Advisory Committee to transfer all non-imageable documentary material to an LSSA-controlled central records center prior to the HLW repository licensing proceeding (as did the Nevada State representative).

The CNWRA and NRC worked together to draft specific language for the viewgraphs that the CNWRA would use to describe the NRC position at the upcoming LSSARP briefing, reflecting the above points.

Another topic discussed was the NRC's desire to obtain direct, on-line access to DOE/YMPO numeric data bases (currently available only on tape). The LSS Rule does not provide for this type of access, because the LSS is intended to be purely an archival data base. The NRC may decide to negotiate a separate agreement with the DOE to obtain this kind of access.

Another topic was policy for the submission of NRC data to the LSS. The NRC considers this an agency decision - based upon internal legal discussion, subject to appeal.

**IMPRESSIONS/CONCLUSIONS:**

The meeting was most helpful in clarifying the NRC's position with respect to the LSS and to the handling of non-text-searchable material in particular.

**PROBLEMS ENCOUNTERED:**

None.

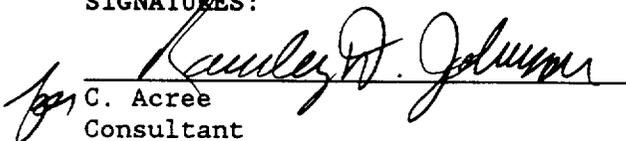
**PENDING ACTIONS:**

The above points will be incorporated, as appropriate, into the CNWRA briefing of the ARP on October 11, 1990.

**RECOMMENDATIONS:**

None.

**SIGNATURES:**

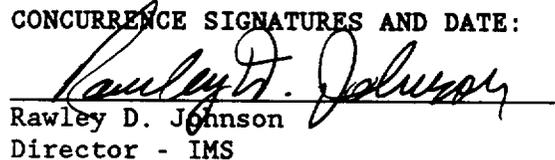
  
C. Acree  
Consultant

  
S. Young

**REFERENCES:**

None.

**CONCURRENCE SIGNATURES AND DATE:**

  
Rawley D. Johnson  
Director - IMS

10/30/90  
Date

  
Allen R. Whiting  
Director-Systems Engineering and Integration

10/31/90  
Date