



Department of Energy
Washington, DC 20585

JUL 24 1990

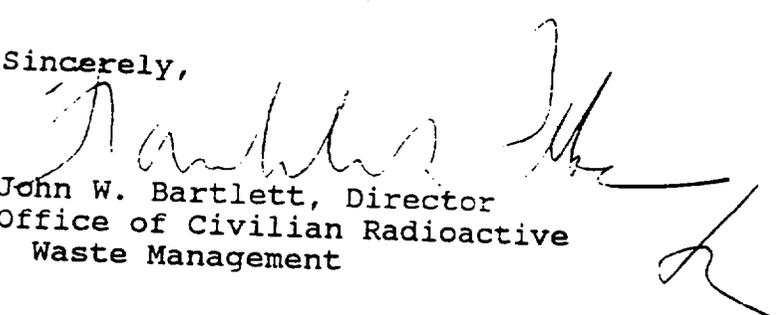
The Honorable Kenneth M. Carr
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Carr:

In accordance with the existing understanding between our Agencies, we have prepared the enclosed draft "Memorandum of Understanding between the U.S. Nuclear Regulatory Commission, Office of the Licensing Support System Administrator and DOE, Office of Civilian Radioactive Waste Management Identifying Guiding Principles for Interface During Development and Implementation of the Licensing Support System" for the purpose of providing a basis upon which we can work together to develop a mutually acceptable final agreement. Such Memorandum of Understanding was anticipated in the preamble to the final LSS rule (54 Federal Register 4/14/89).

We are prepared to begin discussions on any issues you may have regarding this draft. To coordinate the arrangements for such meetings, please have your staff contact Linda Desell of my staff at 586-1462.

Sincerely,


John W. Bartlett, Director
Office of Civilian Radioactive
Waste Management

Enclosure

cc:

R. Bernero, NRC
R. Browning, NRC
J. Youngblood, NRC
D. Moeller, ACNW
R. Loux, State of Nevada
L. Bechtel, Clark County, NV

7/30...To LSS for Direct Reply...Due: 8/13...Cpys: Chrm., RF, EDO, SOC...90-0793
LSS to coordinate with the EDO

MEMORANDUM OF UNDERSTANDING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION, OFFICE OF THE LICENSING SUPPORT SYSTEM ADMINISTRATOR, AND THE U.S. DEPARTMENT OF ENERGY, OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT, IDENTIFYING GUIDING PRINCIPLES FOR INTERFACE DURING DEVELOPMENT AND IMPLEMENTATION OF THE LICENSING SUPPORT SYSTEM

I. INTRODUCTION

a. Background. This Memorandum of Understanding (MOU) outlines procedures for consultation and exchange of information which the Nuclear Regulatory Commission (NRC), Office of the Licensing Support System Administrator (OLSSA), and the Department of Energy (DOE), Office of Civilian Radioactive Waste Management (OCRWM), will observe in connection with the design, development, procurement, implementation, and operation of the Licensing Support System (LSS) under the Nuclear Waste Policy Act (NWPA), as amended, and 10 CFR Part 2 and supersedes all previous LSS specific agreement(s) between NRC and DOE regarding information exchange and consultation for the LSS program.

The LSS is an electronic information management system containing the documentary material of the DOE, NRC, and other parties and interested governmental participants, as well as their contractors, which will be utilized in the licensing of the geologic repository under 10 CFR Part 60. DOE, as the license applicant, and NRC, as the regulator, are potentially the two largest generators of information to be entered into the LSS. Each agency, however, has other special responsibilities in connection with the LSS. DOE is charged with the design, development, and procurement of the LSS. The NRC Office of the LSS Administrator is responsible for management, administration, operation, maintenance, and implementation of the LSS.

b. Purpose. The purpose of this MOU is to permit a review of the DOE license application within the 3-year time period required by section 114(d) of the NWPA, as amended, and to assure that an information flow is maintained between the two agencies which will facilitate the accomplishment by each agency of its responsibilities relative to the LSS. The specific methodology to accomplish this is outlined in the Implementing Agreement in Appendix I. The MOU is to assure that the participants receive adequate information on a timely basis to enable review, evaluation, and comment on DOE activities of regulatory interest in accordance with DOE's Project Decision Schedule and thereby facilitate early identification of potential issues for timely resolution. The MOU is to assure that DOE has prompt access to NRC for discussions and explanations relative to the intent, meaning, and purpose of DOE activities and so that DOE can be aware, on a current basis, of the status of NRC actions relative to DOE activities.

c. Authority. The DOE has authority to enter into this MOU under DOE Order 1280.1, dated September 20, 1985. The NRC has authority to enter into this MOU under [to be provided by NRC]. Neither this MOU nor any activities, reviews, or approvals taken pursuant to this MOU shall take precedence over the requirements of 10 CFR Part 2, nor shall they imply acceptance by the NRC/OLSSA of a completed LSS deemed acceptable for licensing a geologic

repository.

d. Policy. It is the policy of the DOE and NRC to cooperate, to the extent appropriate under the NHPA, as amended, and 10 CFR Part 2, to facilitate the development, implementation, and operation of an LSS.

(1) This MOU shall be subject to the provisions of the Project Decision Schedule that is being established by DOE, and any regulations that may hereafter be adopted by NRC, pursuant to law.

(2) Nothing in this MOU shall be construed to limit the authority of the NRC to require the submission of LSS-related information as part of a management plan (Appendix 1) for LSS activities or the submission of reports on the nature and extent of LSS activities and the information developed from such activities.

(3) It is understood that information made available to either Agency under this agreement may be used at that Agency's discretion in carrying out its responsibilities.

(4) Official policy statements related to the LSS will only be transmitted in writing, signed by the Director, OCRWM, for DOE or the Chairman, NRC. However, nothing in this agreement shall be construed as limiting forms of informal consultation not mentioned in this agreement (for example, telephone conversations or informal exchanges of written, printed or electronic material). These other consultations will be documented in an appropriate and timely manner.

Informal technical communications are intended solely for the exchange of information and ideas by NRC and DOE personnel involved in the various technical areas relating to LSS development, implementation, and operation. Individuals participating in such communications have no authority to present official NRC or DOE positions or to make official policy statements on behalf of either NRC or DOE.

2. MANAGEMENT AND PROGRAM GUIDELINES

a. Management and Review

(1) Responsibilities of participating parties. One of the objectives of developing this MOU is to outline how the DOE/OCRWM and the NRC/OLSSA are to interact in the LSS development process. In the consultations between DOE/OCRWM and NRC/OLSSA, emphasis will be placed on ensuring that there is a smooth transition through design, development, procurement, implementation, and operation of the LSS and that the design effort results in a system that can be accepted in a timely manner by NRC prior to the submission of the license application. The responsibilities of DOE and NRC are stated briefly below. A detailed Implementing Agreement is included as Appendix 1, attached.

(a) Department of Energy. DOE/OCRWM has direct line management responsibility for: the LSS policy for design, development, and

procurement; LSS implementation within DOE; and keeping OLSSA and the LSS Advisory Review Panel (ARP) advised of plans and progress on the LSS development. DOE is responsible for developing the baseline LSS plan, regular 3-month updated plans, progress reports following each prior plan, and managing the entire LSS development effort against these plans. These plans will include a development and implementation schedule for the LSS which will be consistent with the schedule for a repository license application. DOE is also responsible for communicating plans and progress to the NRC/OLSSA and the LSS ARP so that they are kept currently informed of the status of the LSS development effort.

(b) Nuclear Regulatory Commission. The NRC/OLSSA will provide consultation, advice, commentary, and critical review to DOE in the processes of design, development, and procurement of the LSS. OLSSA will review all planning materials such as the baseline, the 3-month plan, and progress reports based on the prior plans and provide comments within 20 working days. OLSSA will also review DOE milestone deliverables generated by DOE and its contractors. These deliverables will include products such as design documentation, procurement plans, specification packages, draft or preliminary procedures, implementation plans, training plans, and other information management tools developed for the LSS. NRC/OLSSA review will address forward-looking aspects of the DOE plans and deliverables, anticipating its operational role when DOE transfers the LSS to NRC.

(2) Designated points of contact. Respective points of contact for the DOE/OCRWM and the NRC/OLSSA are defined in Appendix 2. Either agency may change their points of contact unilaterally with 10-day prior written notification to the other party.

Other organizations within the NRC will work through these designated points of contact within the NRC's Office of the LSS Administrator for interactions with the DOE's Office of Civilian Radioactive Waste Management for issues concerning the LSS.

Other organizations within the DOE will work through these designated points of contact within the DOE's Office of Civilian Radioactive Waste Management for interactions with the NRC's Office of the LSS Administrator for issues concerning the LSS.

b. Guidelines

(1) Meetings. From the time this MOU is signed until it is amended, and for so long as LSS activities are being planned or are in progress, DOE and NRC will schedule and hold meetings periodically as provided in this section. A written summary agreed to by both DOE and NRC will be prepared for each meeting including agreements reached.

(a) Periodic management meetings will be held whenever necessary, but at least biannually, to review the summary results of the technical meetings; to review the status of outstanding concerns and issues; to

update the schedule of technical meetings and other actions needed for resolution of open items regarding the LSS program; and to consult on what generic guidance it is advisable and necessary for NRC to prepare. Unresolved management issues will be promptly elevated to upper management for resolution.

As part of the discussion during management meetings held under this MOU, issues related to policy, budget, program scope, commitment of resources and program schedules may be included, as appropriate. The host agency, i.e., DOE during the design, development, and procurement phase and NRC during the management, administration, operation, maintenance, and implementation phase, has the responsibility for organizing and conducting management meetings.

(b) Technical meetings will be held between DOE and NRC technical staff to: review and consult on the development, implementation, and operation of the LSS; identify potential issues for reference to the LSS Advisory Review Panel; and agree upon the sufficiency of available information and data as needed to facilitate NRC reviews and evaluations of potential LSS issues.

Future technical meeting schedules will be agreed upon during technical meetings. Such schedules will cover approximately a 4-month period, or longer, and will be updated at least monthly and posted prominently in the local and Headquarters public document rooms of both the NRC and the DOE. In addition, a toll-free telephone service (800-368-2235) is operated by DOE Headquarters to announce the meeting schedules.

Affected State, local government, and Tribal representatives will be participants, if they so desire, at the technical meetings. All technical meetings between NRC/OLSSA technical staff and DOE/OCRWM are open for interested members of the public to attend as observers pursuant to the spirit of "Open Meeting Statement of NRC Staff Policy," 43 Federal Register 20858, 6/28/78.

Dates for major technical meetings will be agreed to as far in advance as is practicable with a goal of 4 months in advance. Final agreement as to agenda and participants normally will both be reached a minimum of 10 working days prior to the scheduled date for the meetings, and NRC will mail or telefax meeting schedule notices and agendas to affected State, local government, and Tribal representatives, with a copy to DOE/OCRWM. Deviations from the agreed-to agenda are permitted upon agreement of NRC and DOE. Although both agencies will use their best efforts to provide the indicated lead times, nothing in this section shall be construed as preventing the scheduling of technical meetings with shorter lead times by mutual agreement. The host agency has the responsibility for organizing and conducting technical meetings.

(c) A meeting summary describing important observations and issues discussed at meetings will be jointly prepared by DOE and NRC for the technical and management meetings discussed above, and signed by representatives of both agencies within 2 weeks of the conclusion of

each meeting. An opportunity will be provided for State, local government, and affected Tribal representatives to add their comments and observations to the summaries of meetings they attend. A standard format, shown in Appendix 3, will be used in the preparation of meeting summaries. The meeting summaries will be issued by the host agency within 2 weeks after the meeting. Actions and/or commitments made by either party at a meeting will not be final until formally transmitted over the signature of the respective official of DOE (TBD) and NRC (TBD). The NRC will provide the meeting summaries to the affected States, local governments, and Tribes.

(d) Schedules of activities pertaining to technical meetings will be made publicly available. Potential host States, affected Indian Tribes, and local governments will be notified of the technical meetings covered in this section (Paragraph b.1(b)). The notification will be given 10 working days prior to the date of the meeting by the NRC. If, however, DOE and NRC agree to a meeting on shorter notice, NRC will provide notification as far in advance as possible. These technical meetings will be open, with members of the public being permitted to attend as observers.

(2) Source Evaluation Board Participation. The OLSSA shall identify a representative to participate as a member of the DOE Source Evaluation Board for the procurement of hardware and software for the design and development of the computer system necessary to implement the LSS and the follow-on redesign and procurement of equipment to maintain the LSS, as per 10 CFR 2.1011(b).

(3) Timely Release of Information

(a) Materials developed by the DOE during design of the LSS will be made available to NRC on a current, continuing basis after the DOE (or DOE contractor) quality assurance checks that are inherent in determining the materials have been developed and documented properly.

(b) DOE's analyses and evaluations of LSS design materials will be made available to NRC in a timely manner. NRC's analyses, evaluations and comments on design materials will be made available to DOE in a timely manner, so as not to interfere with design progress or procurement.

c. Program Funding. To the extent practicable, NRC/OLSSA and DOE/OCRWM will consult with each other during funding interactions with the Office of Management and budget concerning the LSS program. Each agency is individually responsible for obtaining the funding necessary to carry out its responsibilities with respect to the LSS. Specifically, DOE is responsible for the design, development, and procurement of the LSS; NRC is charged with managing, administering, operating, maintaining, and implementing the LSS.

d. Management Arrangements. This memorandum of understanding envisages direct communication between DOE/OCRWM and NRC/OLSSA program officials involved in managing the development, implementation, and operation of the LSS. The Implementing Agreement, contained in Appendix 1, sets forth more

specific arrangements for LSS program design, development, procurement, implementation, and operation.

3. LSS MATTERS NOT SUBJECT TO THIS MOU

a. Evaluation and Certification of DOE Compliance with the LSS Rule on Document Submission. Under 10 CFR 2.1003, the LSS Administrator is required to evaluate, at 6-month intervals, DOE's compliance with respect to submission of documentary material relevant to the licensing of the geologic repository to the LSS. At least 6 months before DOE submits its license application to NRC, the LSS Administrator must, under 10 CFR 2.1003(h), certify whether or not DOE has substantially complied with those obligations. The criteria for making such certifications are not subject to this Memorandum of Understanding.

b. Relationship to Other Affected Interests. Nothing in this Memorandum of Understanding shall be construed to impair the rights or to relieve the responsibilities of DOE, NRC, the LSS Advisory Review Panel or other LSS participants as established in 10 CFR Part 2.

4. ADMINISTRATION.

a. Patents, Technical Data, and Financial Policy. It is the policy of DOE/OCRWM and NRC/OLSSA to make the results of the research, development, or demonstration of work contemplated by this Memorandum of Understanding available to the public consistent with applicable security and other regulations. Because DOE/OCRWM has a specific statutory patent policy directing how this should be accomplished, DOE patent policy normally shall apply to interagency agreements executed between DOE and NRC. DOE's technical data policy normally will be followed in view of its close relationship to DOE's patent policy. DOE's financial policy normally will be followed in view of differences in financial restrictions placed on agencies.

b. Quality Assurance. The DOE/OCRWM is developing and implementing a quality assurance program meeting the requirements of 10 CFR Parts 50, 60, 71, and 72. The quality assurance controls necessary to achieve the high level of quality demanded by the transportation and storage of radioactive waste are imposed on, and implemented by each organization participating in the program through DOE/RW-0214, Quality Assurance Requirements for the Civilian Radioactive Waste Management Program (QAR). The QAR provides the requirements for the development of a consistent framework for implementing quality assurance programs at every level within the DOE/OCRWM program. The DOE/OCRWM quality assurance program is applied to items and activities in a graded manner commensurate with their importance to safety, waste isolation and other DOE/OCRWM program objectives. Consistent with this quality assurance program, design, development, and procurement of the LSS have been determined not to be quality affecting work. This document does not contain information that will be used for establishing site characteristics, developing designs, or in the licensing process. However, DOE/OCRWM will perform design, development, and procurement functions in a quality manner which will result in an LSS of sufficient quality to be used during the licensing of the geologic repository.

c. Public Information Coordination. Subject to the Freedom of Information Act (5 U.S.C. 552), decisions on disclosure of information to the public regarding projects and programs implemented under the Memorandum of Understanding will be made following consultation between DOE/OCRWM and NRC/OLSSA or by either party upon 10-day written notice to the other.

d. Amendment and Termination. This Memorandum of Understanding will be reviewed annually and may be modified, amended or terminated by mutual written agreement between DOE/OCRWM and NRC/OLSSA, or may be terminated at any time by either party upon 30-day written notice to the other. It is agreed that this MOU will be closely reviewed and updated to reflect necessary changes at the time OLSSA assumes control of the operation of the LSS.

e. Dispute Resolution. Disputes between DOE/OCRWM and NRC/OLSSA concerning each of technical, administrative, and procedural matters will be referred to individuals with expertise in these areas. Lists of such individuals, agreed upon by both DOE and NRC, are contained in Appendix 4.

Disputes between DOE/OCRWM and NRC/OLSSA concerning policy matters will be referred to successively higher levels of management until resolved.

f. Effective Date. This Memorandum of Understanding is effective when signed by both parties.

Director
Office of Civilian Radioactive
Waste Management

Chairman
U.S. Nuclear Regulatory Commission

Date: _____

Date: _____

APPENDIX 1

PROPOSED IMPLEMENTING AGREEMENT
LICENSING SUPPORT SYSTEM

1.0 Purpose

The objective of developing a management plan is to outline how the Department of Energy (DOE) Office of Civilian Radioactive Waste Management (OCRWM), and the Nuclear Regulatory Commission (NRC) Office of the LSS Administrator (OLSSA), are to interact in the LSS development process. It defines an initial baseline to be used in managing the working environment, details areas of responsibility, and how DOE/OCRWM and NRC/OLSSA are expected to manage their areas of responsibility.

2.0 Regulatory Basis

The direction provided in the final Negotiated Rule provides in Section 2.1011, "LSS Management and Administration", that:

"(a) The Licensing Support System shall be administered by the LSS Administrator who will be designated within 60 days after the effective date of the rule.

(b)(1) Consistent with the requirements in this subpart, and in consultation with the LSS Administrator, DOE shall be responsible for the design and development of the computer system necessary to implement the Licensing Support System, including the procurement of computer hardware and software, and, with the concurrence of the LSS Administrator, the follow-on redesign and procurement of equipment necessary to maintain the Licensing Support System."

(b)(3) DOE shall implement consensus advice from the LSS Advisory Review Panel under paragraph (f)(1) of this section that is consistent with the requirements of this subpart."

3.0 Participants

3.1 Department of Energy

DOE has direct line responsibility for the design, development, and procurement activities as outlined in 10 CFR Part 2. To achieve this mission, DOE must support two major focal points, consistent with the DOE cost, schedule, and technical baselines and DOE Change Control Board procedures. DOE will request NRC to designate one NRC person to serve as a member of the DOE Change Control Board.

The first focal point is the responsibility for developing the baseline plan, regular 3-month plans, progress reports against the prior plan, and managing the entire LSS development effort against these plans. These plans will include a development and implementation schedule for the LSS which will be

consistent with the schedule for a repository license application.

The second focal point is the responsibility for communicating plans and progress to the Office of the LSS Administrator and the LSS Advisory Review Panel (ARP) so that they are fully informed of the status of the LSS development effort. DOE will provide all planning materials such as the baseline, the 3-month plan, and progress reports to the NRC/OLSSA before these materials are formally presented to the ARP. Additionally, DOE will provide appropriate copies of milestone deliverables generated by DOE and its contractors. These deliverables will include products such as design documentation, procurement plans, specification packages, draft or preliminary procedures, implementation plans, training plans, and other information management tools developed for the LSS.

3.2 Office of the LSS Administrator

The NRC/OLSSA has responsibility to provide consultation, advice, commentary, and critical review to DOE/OCRWM in the processes of design, development, and procurement of the LSS. In reviewing the materials provided by DOE/OCRWM, the OLSSA will address forward-looking aspects of the plans and deliverables anticipating the OLSSA operational role when DOE transfers the LSS to NRC. In the consultations between DOE and OLSSA, emphasis will be placed on ensuring that the proper transition from LSS development and implementation and that the design effort results in a system that can be validated and accepted in a timely manner by NRC prior to the license submission. The following criteria will be used to determine when the LSS is complete and ready for NRC acceptance:

- o The system delivered by the DOE turnkey vendor has gone through integration testing, system testing and acceptance testing by DOE.
- o When the remediation called for by DOE in these testing phases, if any, has been delivered and accepted by DOE.
- o When, after any such remediation has been completed, DOE and NRC perform a highly-structured walk-through to review the completeness and quality of the system. When any final remediation identified in this walk-through has been completed to the satisfaction of DOE, the system is presented to OLSSA for certification.
- o The LSS's Primary Installation has been established at the University of Nevada at Las Vegas.
- o Output from capture system of 650,000 pages to validate the system's functionality, and sufficient CPU transactional resources, data storage, and telecommunications (e.g., central and shared hardware and software resources) are installed and operational to support the eventual storage, retrieval, and provision of 40 million pages of information (header, text, and image).

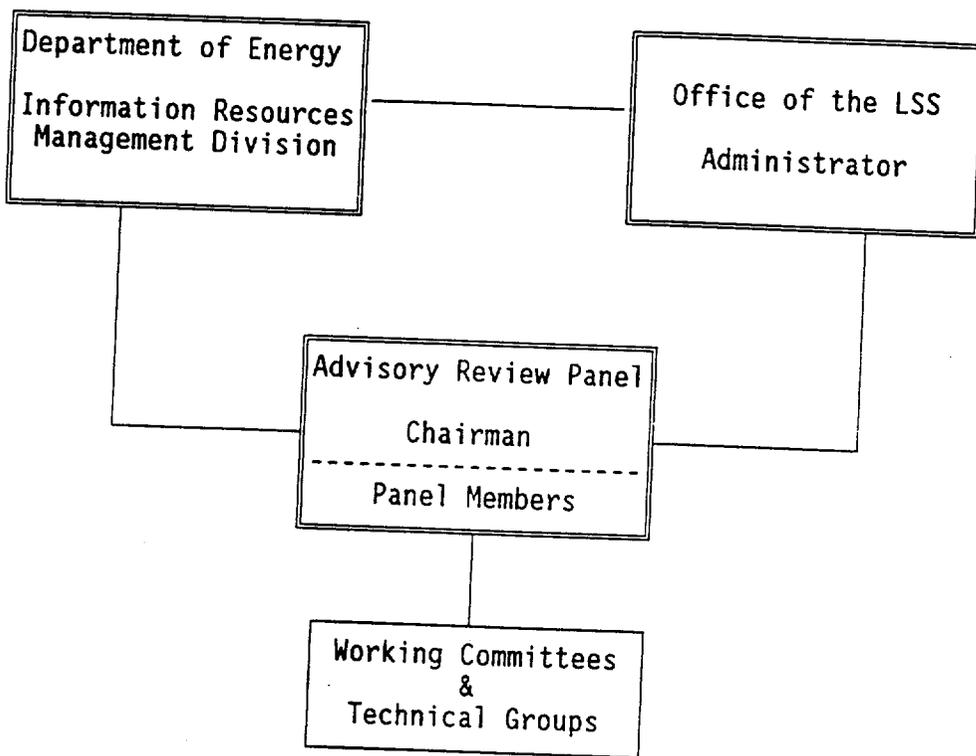
- o Sufficient stand-alone Capture Systems are available to meet backlog and current processing requirements as reasonably anticipated so that the system is in a current processing mode six months prior to DOE's scheduled license application submission date.

3.3 LSS Advisory Review Panel

The LSS Advisory Review Panel is authorized by 10 CFR 2.1011(e) and (f). The DOE and NRC, as parties to the licensing process, are represented on the ARP as are other future LSS users and Federal agency representatives with expertise in automated information systems. The purpose of the ARP is to provide consensus advice to the NRC/OLSSA and DOE/OCRWM on issues related to LSS design, development, and operation. DOE/OCRWM and the NRC/OLSSA are required by 10 CFR 2.1011(b)(3) and (c)(1) to implement such consensus advice, consistent with the objectives of 10 CFR Part 2. Information concerning the ARP is included in this Implementing Agreement so that the relative interactions of DOE/OCRWM and NRC/OLSSA may be understood in the context of their relationship to the ARP. Inclusion of information concerning the ARP does not imply that the ARP is party to or bound by this Implementing Agreement.

4.0 Management Structure and Responsibilities

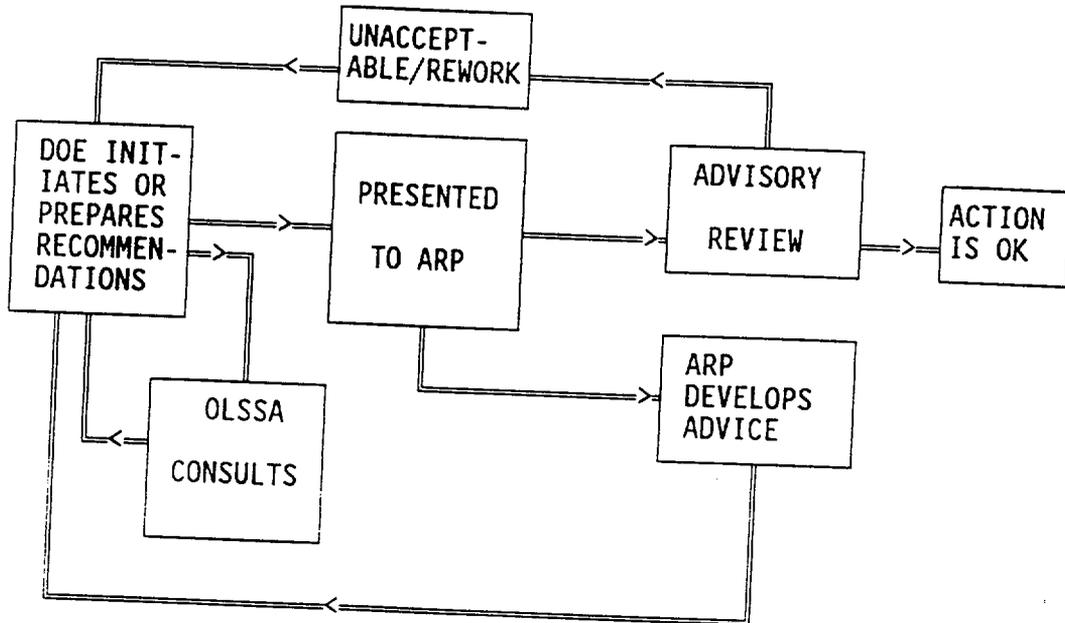
The management structure for the working environment to be established is represented in the following figure.



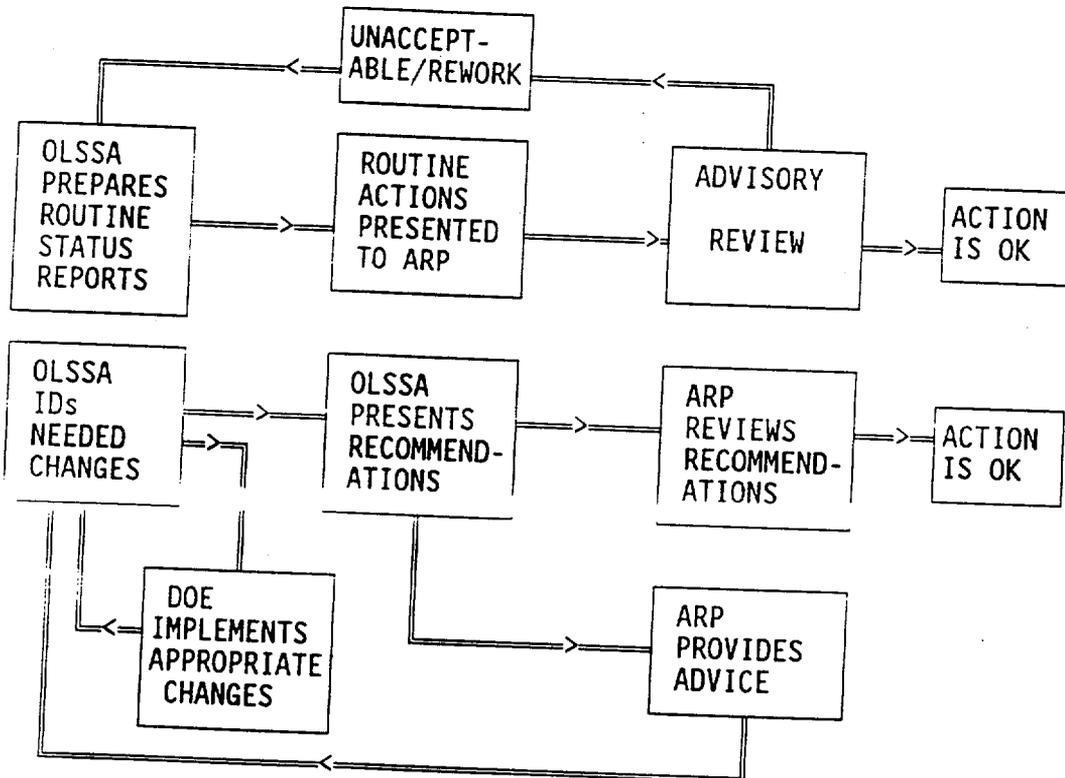
Each of these three groups, ARP, DOE/IRMD, and OLSSA, have varying levels of responsibilities during the development and implementation phase of the LSS. During the design, development, and procurement phases of LSS development, DOE must take the preeminent responsibility for ensuring success. When the system has been loaded and reviewed and accepted by OLSSA per the aforementioned criteria, the OLSSA assumes preeminent responsibility for continuing operations and for identifying subsequent enhancements. DOE is responsible for design, development, and procurement of LSS enhancements, consistent with the DOE cost, schedule, and technical baselines, DOE Change Control Board procedures, technical feasibility and budget considerations.

The routine interaction flows which are supported by this management structure are represented in the following figures. (See next page.)

DESIGN, PROCUREMENT & IMPLEMENTATION STAGES



OPERATIONAL PHASE



The responsibilities of each of the participants are represented in the charts detailed below.

	DOE/OCRWM	NRC/OLSSA	Advisory Review
DESIGN	Manage Technical Contract		
	Develop Baseline		
	Present Baseline to OLSSA	Review Baseline and Provide Commentary to DOE	Evaluate Baseline
	Present Baseline to ARP		Advise on Baseline
	Implement C/S/T Baseline, DOE Change Control Board	Designate DOE Change Control Board Member	
	Evaluate Ongoing Options & Alternatives as Identified During Continuing Development	Review Options & Alternatives Presented by DOE and Provide Commentary to DOE	
	Present Options & Alternatives to OLSSA and ARP		Consider Options & Alternatives Presented and Develop Consensus
	Implement ARP Advice, as Appropriate		

	DOE/OCRWM	NRC/OLSSA	Advisory Review
DEVELOPMENT	Technical Contract Management		Examine as Milestones
	Accept Deliverables	Review Deliverables and Provide Commentary to DOE	Examine 3-Month Plans Against Baseline
	Prepare 3-Month Plans	Review Plan and Provide Commentary to DOE	Examine Progress Reports Against Baseline
	Prepare Progress Reports	Review Progress Reports and Provide Commentary to DOE	Consider Extraordinary Items Presented and Develop Consensus
	Identify Extraordinary Items Requiring OLSSA and ARP Review	Review Extraordinary Items and Provide Commentary to DOE	
	Implement ARP Advice, as Appropriate		
PROCUREMENT	Prepare Specification Packages	Review Specification Packages and Provide Commentary to DOE	Examine as Milestones
	Lead Technical Evaluation Panels	Membership in Technical Evaluation Panels	
	Contracting Office Technical Representative (COTR)	Advance Consideration for Processes and Procedures	
	Implement ARP Advice, as Appropriate		

	DOE/OCRWM	NRC/OLSSA	Advisory Review
IMPLEMENTATION	Technical Contract Management Through Preliminary Load	Develop Processes and Procedures; Elicit Participant Consensus	Examine as Milestones
	Accept Interim Deliverables	Review Deliverables and Provide Commentary to DOE	Examine as Milestones
	Prepare 3-Month Plans	Review Plan and Provide Commentary to DOE	Examine 3-Month Plans Against Baseline
	Prepare Progress Reports	Review Progress Reports and Provide Commentary to DOE	Examine Progress Reports Against Baseline
	Evaluate Ongoing Options & Alternatives as Identified During Continuing Implementation	Review Extraordinary Items and Provide Commentary to DOE	
	Present Options & Alternatives to OLSSA and ARP		Consider Extraordinary Items Presented and Develop Consensus
	Implement ARP Advice, as Appropriate		
	Accept Completed System as Deliverable; Present to LSSA at Least 6 months Prior to License Application Submission	LSS Administrator Reviews System for Acceptance	Examine as Milestones
	System Accepted by LSS Administrator		

	DOE/OCRWM	NRC/OLSSA	Advisory Review
OPERATIONAL	Provide Training & Documentation to OLSSA Designees		Examine as Milestones
	Transfer COTR Status to OLSSA	COTR for Operations & Maintenance Contracts	Examine as Milestones
	Channel for Contract Administration & Payments of Invoices		
	Implement Enhancements as Recommended by OLSSA, as Appropriate	Identify Enhancements or Options and Alternatives and Present to ARP	Evaluate Enhancements & Provide Advice
		Accept Deliverables	Examine as Milestones
		Prepare 3-Month Plans	Examine 3-Month Plans Against Baseline
		Prepare Progress Reports	Examine Progress Reports Against Baseline
		Implement ARP Advice	
		Collection Scheduling for Intake	

The above tables reflect an approach whereby planning and reporting are institutionalized in the task area responsibilities of each of the parties throughout the life of the LSS. It recognizes that these responsibilities will change as the LSS moves from the implementation phase into the operational phase, at which time the OLSSA assumes the role and responsibilities previously handled by DOE. Recognizing this change, critical hand-off points are identified in the baseline and as key milestone items in the above charts.

5.0 Planning

5.1 Model Baseline

This section presents a model baseline which may be used as a foundation for that which is to be developed and used as the methodology for LSS implementation efforts. It is only a suggested model, and its level of detail may be raised or lowered to meet the needs of a baseline plan.

Information Management

- Vocabulary Tools Development
- Controlled Organization Lists
- Controlled Document Type Lists
- Controlled Subject Vocabulary - Thesaurus
- Cataloging Procedures
- Update Record Submission Procedures

Capture System (Including Correction Station)

- Capture System Design Documentation
- Capture System Specifications
- Capture System RFP Completed
- Capture System Facilities Designs
- Capture System Facilities Build-Outs
- Capture System Duplicate Check Communications Network In-Place
- Capture System Hardware Delivery
- Capture System Software Design Documentation
- Capture System Software Delivery
- Capture System Software Documentation & Maintenance Manual
- Capture System Operations & Procedures Manual Delivery
- Capture System Training Plan
- Capture System Training
- Capture System Installation/Integration
- Capture System Test Plan
- Capture System Operational Testing & Acceptance

Search/Image/Workstation

Search System Requirements Documentation
Search System Design Documentation
Search System DBMS Specifications
Search System Hardware Specifications

Image System Design Documentation
Image System Specifications

Search/Image System Facility Design
Search/Image System Facility Build-out Complete

Workstation Level II Design Documentation
Workstation Level II Specifications

Search/Image/Workstation System RFP Completed
Search/Image/Workstation System Hardware Delivery
Search/Image/Workstation System Software Design Documentation
Search/Image/Workstation System Software Delivery
Search/Image/Workstation System Software Documentation & Maintenance
Manual
Search/Image/Workstation System Operations & Procedures Manual Delivery
Search/Image System Training Plan
Search/Image System Training
Search/Image System Test Plan
Search/Image System Operational Testing & Acceptance
Workstation User Training Plan
Workstation User Training

Communications System

Telecommunications Plan
Communications Design Documentation
Communications Circuit Specifications
Communications Hardware Specifications
Communications Network Management Specifications
Communications Circuit Implemented via FTS2000
Communications Hardware and Network Management RFP Completed
Communications System Operational
Communications Procedures & Documentation Delivery
Communications Training Plan
Communications Training

LSS Integration of Modules

- System Integration Test Plan
- System Integration Test
- System Integration Acceptance
- System Performance Validation Plan
- System Performance Validation

LSS Operational]

Presented by DOE 6 months Prior to License Application Submission
Operations transferred during 6-month review
LSS Formally Accepted by LSS Administrator (date certain)

Contract Administration Transfers:
Hardware Maintenance Agreements
Software Licenses and Maintenance Agreements
Facility Lease Agreements
Facility Utility Accounts Transferred

COTR Redesignations:
Capture System/Correction Station Operations Contract
LSS Search/Image Computer Center Operations Contract

As envisioned, each of these milestone events would be identified as such in the baseline, used in the development of all planning documents, and reported against accomplished activities.

6.0 Reporting

Reports on plans and progress against plans shall be prepared by DOE/OCRWM for submission to OLSSA on a regular monthly basis to provide the NRC/OLSSA a continuing source of information required for the NRC/OLSSA to generate the biannual reports called for by the Rule. These reports would be consistent with the format agreed to for the quarterly (3-month) reports against the last prior Plan-Ahead to facilitate tracking against the Plan-Ahead.

At 3-month sessions, reports are made against the prior Plan-Ahead and presented by DOE/OCRWM (or the NRC OLSSA/during the subsequent operational phase of the LSS) to the ARP.

APPENDIX 2

POINTS OF CONTACT

1. Points of contact between NRC and DOE.

a. Formal Communications

DOE

Director, Office of Civilian
Radioactive Waste Management
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

NRC

Designated Commissioner or
Chairman
U.S. Nuclear Regulatory Commission
One White Flint North
Washington, DC 20555

b. Meeting Arrangements

DOE

Chief, Licensing Branch
Office of Civilian Radioactive
Waste Management
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

NRC

Administrator, Office of the
LSS Administrator
U.S. Nuclear Regulatory Commission
One White Flint North
Washington, DC 20555

c. Technical Communications

DOE

Director, Information Resources
Management Division
Office of Civilian Radioactive
Waste Management
1000 Independence Ave., SW
Washington, DC 20585

NRC

NRC Contact TBD

APPENDIX 3

STANDARD FORMAT FOR MEETING REPORTS

DATE/LOCATION OF MEETING

ATTENDEES/ORGANIZATIONAL AFFILIATION

BACKGROUND/FACTS

1. What information was reviewed, exchanged, and discussed (Summary listing fashion)
2. Agenda of discussion

OBSERVATIONS

1. NRC questions, suggestions, or comments on scope and direction of the DOE technical program. (Best attempt made to identify all important matters)
2. DOE observations
3. State/Tribal observations of technical meeting

AGREEMENTS

OPEN ITEMS

1. Technical questions for further discussion
2. Specific responsibilities for information exchange and commitment on other business matters
3. Actions and assignments

APPENDIX 4

TECHNICAL EXPERTS FOR DISPUTE RESOLUTION

This Appendix will provide lists of individuals to be relied on for dispute resolutions regarding each of technical, administrative, and procedural matters. The persons on these lists will be determined in negotiations between DOE and NRC.