SHAW, PITTMAN, POTTS & TROWBRIDGE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
2300 N STREET, N. W.
WASHINGTON, D. C. 20037

TELEX/CABLE
89-2693 (SHAWLAW WSH)

TELEPHONE
(202) 663-8063

VIRGINIA OFFICE
1501 FARM CREDIT DRIVE
MCLEAN, VIRGINIA 22102
(703) 790-7900

TELECOPIER
(202) 223-3760 & 223-3761

JAY E. SILBERG, P.C.

March 16, 1989

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Final Rulemaking on the Licensing Support System for High-Level Waste Licensing -- Response to Request by Commissioner Rogers for Cost Estimate of Alternate Licensing Support System

Gentlemen:

At the Commission's February 7, 1989 briefing on the final rule regarding the High-Level Waste Management Licensing Support System, Commissioner Rogers asked the Industry Coalition to provide a cost estimate of the alternative licensing support system that the Coalition had proposed. The alternate system was a microfilm-based system with computerized document indexing and coding system and overnight document delivery.

As we noted during that briefing, the Industry Coalition did not have the resources or data to develop its own cost estimate of an alternative LSS. Since that time, we have been seeking such information from organizations which have created and operated litigation and licensing support systems. As a result of that effort, we received a letter yesterday from Aspen Systems Corporation, a company with extensive experience in this field. Over the last seven years, in the course of providing licensing and litigation support for nuclear utilities, Aspen has used the type of system proposed by the Industry Coalition to manage more than 500 million pages of material. As explained in the enclosed letter, Aspen estimates that the alternative system suggested by the Industry Coalition would save an estimated $125 to $150 million as compared to the DOE baseline system. In addition, the alternative system would be able to load all backlog documents (i.e., those in existence when the system goes into operation) almost four years faster than the DOE system. Aspen concludes that the full text system envisioned by DOE and the LSS rule is of questionable value and that the incremental cost is neither prudent nor justifiable.

3/16...To Secy for Appropriate Action...Cpys to:
Cmrs, OGC, EDO, ASLBP, ASLAP, GPA/SP....89-0238

The information submitted by Aspen is completely consistent with the views expressed by the Industry Coalition at the February 7 briefing and in its comments on the proposed LSS rule and demonstrates why the system contemplated by DOE and the proposed rule is unjustifiable.

Very truly yours,

Jay E. Silberg
Counsel to the Industry Coalition

cc: Chairman Lando W. Zech, Jr.
Commissioner Thomas M. Roberts
Commissioner Kenneth M. Carr
Commissioner Kenneth Rogers
Commissioner James R. Curtiss
Francis X. Cameron, Esquire
LSS Negotiating Committee Members

Aspen Systems Corporation

March 15, 1989

Steven Kraft
Director,
Utility Nuclear Waste and
Transportation Program
Edison Electric Institute
1111 19th Street, N.W.
Washington, D.C. 20036-3691

Dear Mr. Kraft:

Upon your request, Aspen has performed a preliminary review of the SAIC reports relative to the design, creation and implementation of a Licensing Support System for the high level waste repository program. Our review was directed primarily at considering alternative approaches to the SAIC Baseline Approach from a cost and functionality perspective.

An alternative approach which we feel should be seriously considered is one which Aspen has very successfully utilized and refined over the last seven years to support the litigation and licensing support requirements for twenty-seven nuclear utilities. With some minor variations due to project specific requirements, the overall approach has been used to manage in excess of 500,000,000 pages of material representing some 7,000,000 documents actually coded. The overall approach envisions an extensive surrogation process rather than searchable full text and the use of microfilm as the image media for distribution of materials.

The alternative approach is one whereby Aspen would go to the various sites where relevant documents are located and microfilm the material. The microfilm would then be processed, inspected and utilized to generate hard copy for coding purposes. Once the hard copy images from the film are unitized into discreet document entities, coders, utilizing our proprietary on-line coding system, would enter basic bibliographic or header information which will allow the system to detect duplicate documents in an on-line real time environment. Duplicates thus identified are tracked but excluded from further treatment. Since our experience in processing nuclear related collections would indicate a duplication rate of 20-25%, the identification of duplicates early in the process can result in significant savings in cost and time.

Non-duplicate documents will then be coded. While the SAIC reports do not provide a definitive list of data elements for the coding process, data elements which should be considered would include:

- Document Number
- Microform Address
- Other Document Numbers
- Document Date
- Report Number
- Revision Number
- Access Restriction
- Document Type
- Submitting Organization
- Submitter's Reference Number
- Title
- Author/Affiliation
- Recipient/Affiliation
- Copyees/Affiliation
- Names Referenced
- Organizations Referenced
- Subjective Analysis (Keywords, Subject/Topical Codes, Abstract)

Subsequent to the coding and quality control process, the coded data is then passed through several formatting and validation programs prior to database loading for on-line retrieval. Searches can then be performed by authorized users from anywhere in the country with requests for hard copy fulfilled within 24 hours via generation from microfilm or copying from a hard copy library.

Utilizing the above approach, Aspen estimates that we could microfilm, detect duplicates, code and load to a retrieval system the 11,000,000 page/2,000,000 document backlog, within fifteen (15) months of finalization of a coding design, at our estimated cost of approximately $20,000,000. The elimination of the backlog in a fifteen (15) month time frame rather than the sixty (60) month schedule envisioned by SAIC will not only provide for more timely access to the backlog information but will also result in significant savings due to the diminished impact of inflation and the elimination of possible delays in the licensing process.

The approach outlined above, if utilized for all of the 27,500,000 pages projected by SAIC for the project life cycle, would save an estimated $125,000,000 - $150,000,000 vis-a-vis the SAIC Baseline Approach, <u>without</u> consideration of the impact of inflation. This

projected overall cost savings of 60-75% is significant. Our alternative varies from the SAIC Baseline Approach only in the elimination of full text and the use of microfilm as the sole image media. Considering the existing state-of-the-art in image technology and the questionable value of a full text database of the magnitude envisioned (especially in light of the extensive level of subjective coding envisioned by SAIC), Aspen feels that the incremental cost of $125,000,000 - $150,000,000 vis-a-vis the benefits derived is not prudent or justifiable.

We believe the above information should respond to your request. Should you have any questions on our alternative approach or the cost provided, please feel free to contact either of us at anytime.

Sincerely,

JAY KOZA
Vice President/National Accounts

RICHARD J. McHUGH
Vice President/Senior Consultant