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**To:** <nrcprep@nrc.gov>  
**Date:** Tue, Jun 18, 2002 11:15 PM  
**Subject:** Response from "Contact the Web Site Staff"

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 67 FR 5257  
 (4)

The following information was submitted by Paul Sanchez (SWEATDAM@HOTMAIL.COM) on Tuesday, June 18, 2002 at 23:15:31

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Document Title: NUREG 1804 NRC YUCCA MOUNTAIN REVIEW PLAN

Comments: As an ex regulator for the WIPP project, I have the following comments:

Traceability, Transparency, Retrievalability, Reproducibility, Consistency

1) The EPA required the application to be hypertext to the supporting documentation so we (the regulator) didn't have to manually pull the string. It would also help with problems to ensure inadvertent consistencies that send you on wild goose chases. If you don't tell them, they won't do it. Stress you will review consistency and a tool to accomplish it. (remember the horizontal slice issues with the SR)

2) Data Traceability: 10 CFR 63 gives no guidance on this term as it relates to data, although it is discussed vaguely at 66 FR 55765. Issue: Their DTNs are like big bags of tax receipts and they send you to look for the receipts they used. Don't stand for it. Require a road map to any data used from a DTN, specifically to create a parameter.

3) Transparency: If you have a hypertext document, it will work a long way toward giving the picture that is supposed to be transmitted to you, instead of wild goose chases on depending on references to documents that quickly become dated. Make them give it to you on a silver platter.

4) Traceability and transparency: Your review plan does treat these issues evenly. You seem to emphasize it most in the biosphere model but barely mention it in other models...and you still miss the mark. These are QA requirements that have failed in VA and the SR (some labs do better than others, and the independent agency USGS is the worst). You give them no mandate to correct this explicit issue brought in the review of the SR, but fail to provide guidance. Each organization does it differently, one provides a table for a DTN and another a report. Ask them for road maps to the EXACT data they used..don't waste your review time.

Parameter development is even less defined. The project mixes engineering parameters definitions with PA definitions leading to project confusion. Give them guidance that all parameter development will be clearly explained and justified. Engineering and PA parameters are inherently different.

5) Retrievalability: WIPP had paper records where any information for an experiment was on a rack in the records. YMP has a system that separates records. If you try to retrieve supporting records for an experiment you better have a lot of patience. A single DTN can take a week to trace records to. They may be retrievable, but if its a maze what good is it? Require a road map to supporting components of the DTN..

6) Reproducibility. The ability to recreate the results of a calculation or model. YMP is not bad at this with model warehouse, but the nested loop to source DTNs are misleading. Furthermore, inputs and outputs are just a list of numbers. There should almost be an AMR for each input output file. At WIPP they had a parameter bank. When a modeler ran a model, they made a withdraw, defined by date, time and database version. YMP does not have this. Require them to.

7) Technical basis: the YMRP should really make the connection in each section to the 10 CFR 63 language technical basis: that it means all of the above. Else the application will be hard to decipher, or worse it could be meaningless.

Template = ADM-013

E-RIDS = ADM-03  
 Add - J. Cloed (JACB)  
 A. Beane (AFB)

8)The YMP QARD does not give adequate guidance for the above terms because it was geared for experimental activities and calculations, not performance assessment. If they can't do it, make them do it with the YMRP. At least define the terms up front that captures the recurring problems above.

9) The YMRP is the last and best chance to get the program straight as they move from science to compliance. Good luck

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SUBMIT2: Send Questions or Comments

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