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The following information was submitted by
James R. Wolf (jamesrwolf@hotmail.com) on Friday, June 28, 2002 at 17:32:59

Document_Title: Yucca Mountain Review Plan

Comments: These comments relate to Section 4.5.3.1 - DOE Organizational Structure.

There are two important aspects to this area of review:

First, the licensee must establish and follow clear procedures for the delegation of authority. These procedures should include, among other things, documentation of the authority so delegated as well as evaluation of qualifications of the delegate to carry out the functions in a competent manner.

But, second, there should be an evaluation of the licensee's procedures for assuring that all activities that are delegated are in fact carried out in accordance with the license and the Commission's regulations. In other words, it is the licensee that is responsible and the licensee that must at all times be accountable.

The draft review plan addresses the first of these considerations with some care and with some detail. The weakness is that it is unclear regarding the procedures that DOE itself must use to manage the overall project to assure that Commission requirements are met. Should there be failures, it is surely not acceptable for the licensee to avoid responsibility by observing that some contractor did not properly discharge its delegated authority.

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