

SUMMARY OF DISCUSSIONS AT THE JUNE 3, 1992, TECHNICAL EXCHANGE  
ON THE REPOSITORY ANNOTATED OUTLINE AND DG-3003

The staff of the Nuclear Regulatory Commission met with representatives of the Department of Energy (DOE), the State of Nevada (NV) and Clark County, NV to discuss items of mutual interest regarding DOE's annotated outline (AO) initiative and NRC's Draft Regulatory Guide DG-3003, "Format and Content of the License Application for the High-Level Waste Repository" (FCRG). Other affected units of local government were informed of the meeting, but were not present. An attendance list is included as Attachment 1.

The DOE representatives began the exchange by reiterating comments on the FCRG which had been transmitted to the NRC staff in September 1991 and also providing comments on the FCRG which reflected the experience gained through development of the planning package and the first iteration of the skeleton text (Attachment 2). The DOE representatives noted that they believed the FCRG was an acceptable and useful format for license application development. The NRC staff expressed its willingness to consider these additional comments generated during development of the AO, as it prepares a final regulatory guide. However, the staff did note that before these comments could be addressed, they must be formally submitted to the NRC's Regulatory Publications Branch, the Division of Freedom of Information and Publication Services, Office of Administration. The NRC staff also discussed its schedule for further development of the FCRG. DOE intends to formally transmit these additional comments.

The NRC staff began its discussion (Attachment 3) of the AO initiative by reiterating a series of questions posed in a May 22, 1992, letter to John Roberts (DOE) from Joseph Holonich (NRC staff). The staff also provided a brief overview of its review of the April 17, 1992, version of the AO. Representatives of DOE made two presentations regarding the process for developing the AO (Attachment 4) and responded to several questions from the staff and from the representative of the State of Nevada. The questions centered on the way in which the AO related to other programmatic documents, particularly those that were either statutorily required or had been the subject of previous agreements related to issue resolution or performance allocation in the high-level waste program (particularly the Site Characterization Plan). The representative from the State of Nevada suggested that DOE apply the AO concept to site suitability. The DOE representatives responded that it would seriously consider the State's suggestion.

The NRC staff requested further information from DOE on the specific type of review which DOE is requesting from the NRC staff for the AO. As discussed at the February 6, 1992, meeting on issue resolution, the focus of NRC staff reviews during prelicensing is on the review of programs, plans, assumptions, interpretations, and methodologies, not on the adequacy of compliance with

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10 CFR Part 60. The DOE representatives stated that AO's are submitted to provide information to NRC so that the NRC staff may provide guidance to DOE. DOE further stated that if DOE wishes guidance in a particular area that would be noted in the cover letter for that iteration of the AO. The DOE representatives commented that the statement on the AO development and review process which they had agreed to prepare at the February 6, 1992, NRC/DOE Meeting on Prelicensing Consultation was nearly complete.

It is anticipated that further discussions will be necessary on specific and generic concerns related to the AO, other DOE programmatic documents, and NRC licensing and prelicensing guidance documents.

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*Corinne J. Macaluso 8/6/92*  
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Regulatory Integration Branch  
Office of Civilian Radioactive  
Waste Management  
Department of Energy

June 3, 1992  
ATTENDANCE LIST  
FCRG/AO TECH. EXCHANGE

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**NRC STAFF PRESENTATIONS ON FCRG DEVELOPMENT AND  
CONCERNS WITH DOE'S ANNOTATED OUTLINE FOR A REPOSITORY LICENSE APPLICATION**

**MARK DELLIGATTI  
DIVISION OF HIGH-LEVEL WASTE MANAGEMENT  
JUNE 3, 1992**

**NRC Plans for Revision of the FCRG**

- o The NRC staff will review the FCRG and issue a final guide in FY-94**
- o The NRC staff does not anticipate any major changes in format of the FCRG.**

- o The NRC staff has reviewed the April 17, 1992 version of the Annotated Outline.
- o The NRC staff believes that the Annotated Outline basically is consistent with the FCRG. The staff believes that the data is too preliminary to comment on at this time.

- o November 13, 1990 Linehan/Shelor Letter forwarding the FCRG to DOE.

"After the public comments have been considered and any changes have been made, the NRC staff will request that DOE prepare an annotated outline of the license application for the Yucca Mountain site, based on the FCRG, for NRC staff review. This will allow the staff to determine if DOE's understanding of the FCRG is consistent with the staff's intent."

**What is the purpose of the A0**

- o What is the exact relationship of the A0 to:**
  - the Site Characterization Plan (SCP),**
  - study plans,**
  - SCP progress reports,**
  - Early Site Suitability Evaluation (ESSE).**

- o DOE views the AO "...as the key to providing NRC with DOE's understanding and interpretation of the regulatory requirements, and the implementation of these requirements in [DOE's] systems engineering and site characterization activities."
  
- o On February 6, 1992 AO was described as primarily a DOE management tool.

- o The AO is viewed by DOE as "...a mechanism to facilitate active exchanges, both internal and external, for the identification, clarification, and resolution of issues in a timely manner...."
- o How does this relate to issue resolution, as discussed at the February 6, 1992, meeting. (At that meeting the DOE representatives stated that the AO and associated topical reports would not change the existing issue resolution process and mechanism, previously agreed to by the NRC staff and DOE, and implemented in the SCP and the SCP progress reports.

- o **NRC staff would like to see the brief statement on AO development discussed at the February 6, 1992 meeting. It is particularly difficult for the NRC staff to determine the appropriate review of the AO iterations until it has a clearer understanding of the purpose of the AO and how DOE proposes to incorporate the AO into the existing program framework.**

- o Does DOE expect NRC review and comment or not? On February 6, 1992, DOE stated that future versions of the AO would be sent to NRC for the staff's information and to facilitate NRC's guidance to DOE.

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# **DOE/NRC Technical Exchange**

## **DOE COMMENTS ON DG-3003 (FCRG)**

**N. Henderson  
June 3, 1992**

# **Purpose**

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## **Present Status of DOE FCRG Review**

## **Overview**

- **DOE comments on FCRG transmitted Sept. 23, 1991**
- **New DOE comments on FCRG from AO Initiative**

- **Bartlett to NRC letter, dated September 23, 1991**
- **Bartlett letter contained general and specific comments**

## **Examples of DOE General Comments**

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- **Need for a stronger correlation between FCRG and regulations**
- **Redundancy: Same information requested in several places**
- **Need for distinction between guidance and technical preferences**

## **Examples of DOE Specific Comments**

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- **Rewording for precision**
- **Adding information for completeness**
- **Corrections (e.g. editorial)**

## **Status of September 23, 1991 FCRG Comments**

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- **AO lead authors reviewed September 23, 1991 letter**
- **Lead authors believe September 23rd comments are still valid**

- **NRC feedback on September 23 letter**

- **Comments generated by AO Authors**
- **Comments generated during the review of the AO**

## **General Comments**

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- **Basic FCRG structure appears workable**
- **Some rearrangement or changes may be warranted**

## **Recommended Changes to FCRG from the AO Initiative**

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### **[ Where did we deviate from the Draft FCRG? ]**

- **Added Waste Package/EBS Model Descriptions to Chapter 5 [ Sec.5.1.X]**
- **Made Minor Word Changes to Subsection Titles**
- **These changes are documented in the April, 1992 AO Submittal**

## **Potential Changes Now Being Evaluated by DOE**

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- **Distinguish data from interpretations based on data**
- **Distinguish data and data interpretations from PA**
- **Distinguish natural conditions, processes, and events from human - induced conditions, processes, and events**

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# **DOE/NRC Technical Exchange**

## **ANNOTATED OUTLINE INITIATIVE**

**T. M. Williamson  
June 3, 1992**

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# **Overview**

- **Introduction**
- **Annotated Outline Initiative**
- **Annotated Outline Development**
- **Current Status**
- **Schedule**
- **Conclusions**

# **Introduction**

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**The Annotated Outline (AO) is a management tool**

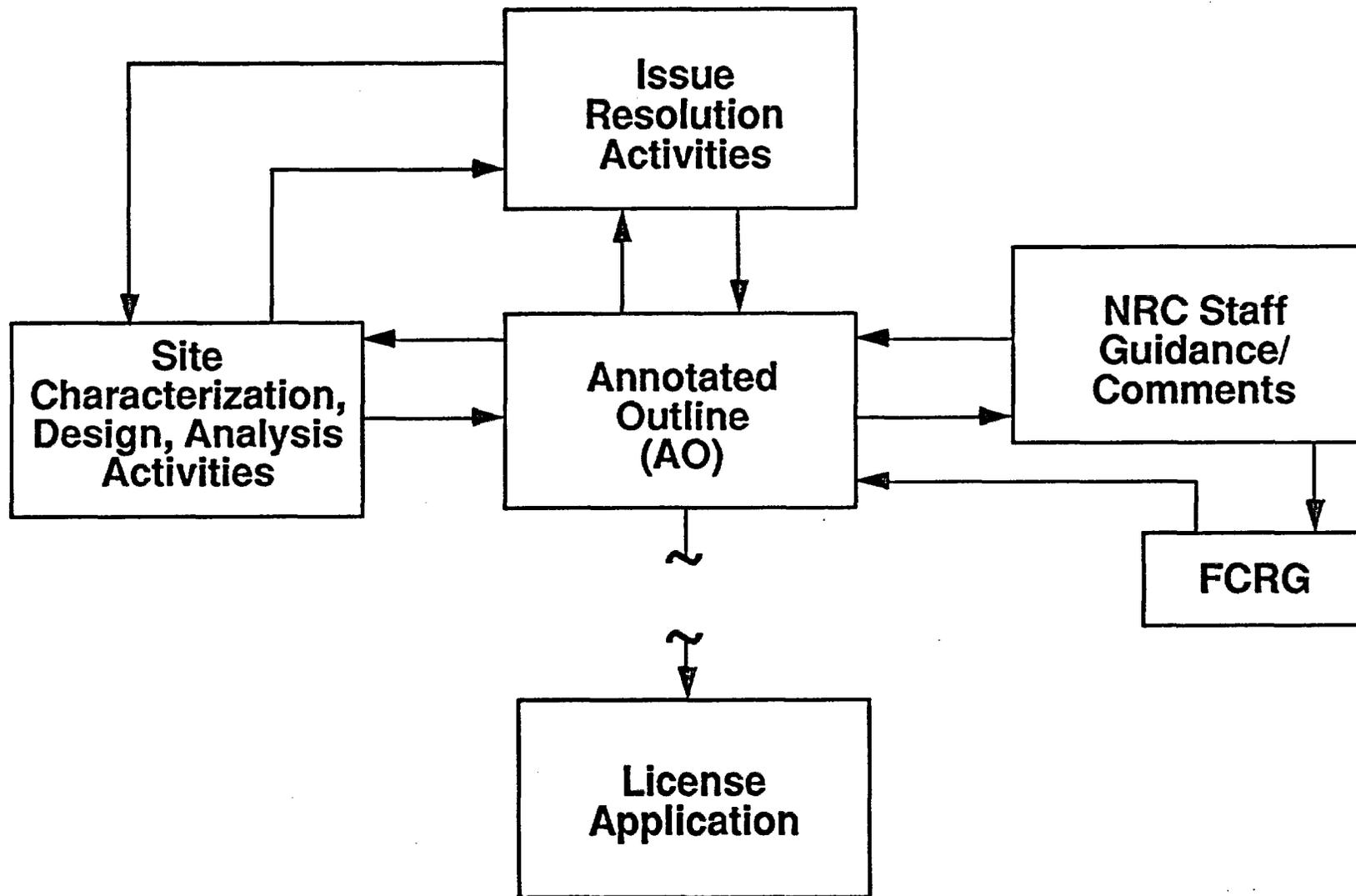
- **Developed by the Management and Operating Contractor (M&O) under DOE direction**
- **Product oriented project management approach**
- **Focal point for integrating compliance strategies and documentation**

# **Annotated Outline Initiative**

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- **Iterative process**
- **Distributed to the Nuclear Regulatory Commission (NRC) semi-annually for information, guidance, and comment**
- **Centralized approach for clarification and resolution**
  - **Shared understanding of applicable regulations and their interpretations**
- **Compatible with issue resolution activities**

# Annotated Outline Initiative (con't)

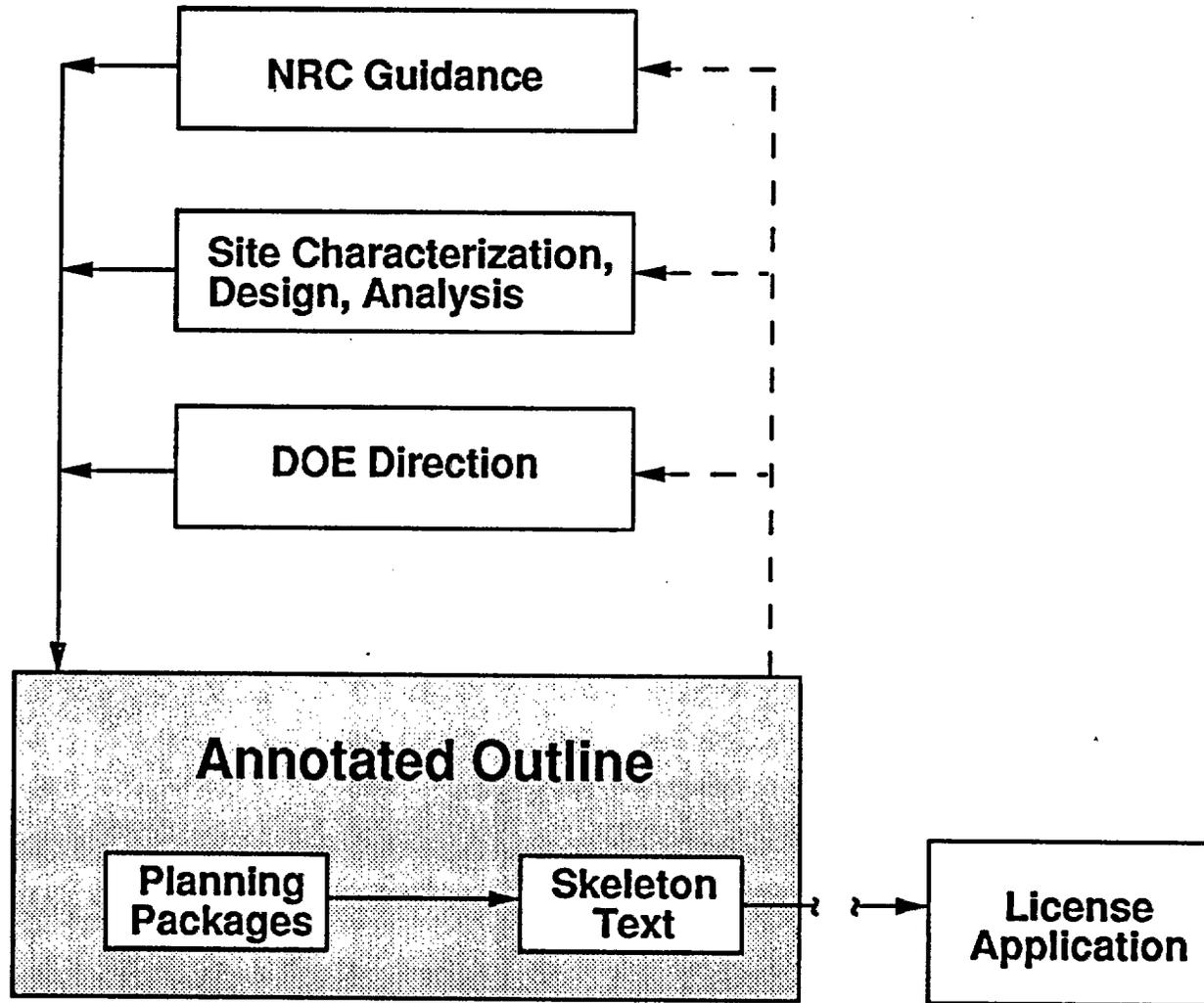


# **Annotated Outline Development**

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- **Identification of qualified authors**
  
- **Two phase development process**
  - **Planning Packages**
  - **Skeleton Text**
  
- **Iterative process**
  - **Development**
  - **Review**
  - **Rework**
  - **Author reassignment, as necessary**

# Annotated Outline Development (con't)



# **Annotated Outline Development (con't)**

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## **Planning Packages**

- **Form 1 - Text**
- **Form 2 - Figures and Tables**
- **Form 3 - References**
- **Form A - Information Request**
- **Form B - Information Response**
- **Form C - Information Request Tracking Log**

# **Annotated Outline Development (con't)**

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## **Skeleton Text**

- **Text with blank spaces**
- **Available information is referenced**
- **Missing information is identified**
- **Written in present tense**
- **References to applicable regulations**

## **Current Status**

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- **DOE submitted AO Planning Packages to NRC on 12/13/91**
- **DOE submitted AO Skeleton Text to NRC on 4/24/92**
- **AO is now an M&O controlled document**
- **Currently expanding AO skeleton text for submittal to NRC in September**
  - **Focusing on references to applicable regulations in each section**

## Current Status (con't)

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### References to applicable regulations

#### Generic example of section/subsection introduction:

- The purpose of this section/sub-section is to demonstrate compliance with 10 CFR 60.113(a)(1)(i)(A)
  - Verbatim "quote" of applicable regulations, as appropriate
  - Description of the compliance strategy
- [Conclude that sufficient information is provided to demonstrate compliance with 10 CFR 60.113(a)(1)(i)(A)\*]

\* Conclusions not yet supported by available information are enclosed in brackets.

## **Schedule**

- **Submit Annotated Outline iterations to the NRC semi-annually**
  - **September 1992**
  - **March 1993**
  - **September 1993**
  - **March 1994 . . .**

## **Conclusions**

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- **Programmatic benefits from the AO initiative**
  - **Enhances awareness of regulatory requirements throughout the Program**
  - **Produces comments from actual experience with draft FCRG**
  - **Identifies information needed in a potential MGDS License Application**
  
- **Requests for information derived from the AO initiative are forwarded to participants involved in**
  - **Site characterization (i.e., study plan implementation)**
  - **Design development**
  - **Analysis activities**
  
- **Facilitates more focused pre-licensing interactions between DOE and NRC**