

MAY 01 1992

MEMORANDUM FOR: Ronald L. Ballard, Chief  
 Geology and Engineering Branch  
 Division of High-Level Waste Management

Margaret V. Federline, Chief  
 Hydrology and Systems Performance Branch  
 Division of High-Level Waste Management

Joseph J. Holonich, Director  
 Repository Licensing and Quality Assurance  
 Project Directorate  
 Division of High-Level Waste Management

FROM: B.J. Youngblood, Director  
 Division of High-Level Waste Management

SUBJECT: DEVELOPMENT OF THE LICENSE APPLICATION REVIEW PLAN (LARP)

On March 6, 1992, the respective managements for the Division of High-Level Waste Management (HLWM) and for the Center for Nuclear Waste Regulatory Analyses agreed to the enclosed general plan for developing the LARP (see enclosure 1). It was also agreed that more detailed planning information was needed before work could commence. The following enclosures contain the needed detailed planning information developed with your input and should be used as additional guidance for developing the LARP:

- FY92 LARP Team (enclosure 2);
- FY92 Working Groups for CDS/CDM Development (enclosure 3);
- Structural Task Force -- Implementation Phase (enclosure 4);
- Grouping of Preliminary RR Topics for CDS/CDM/Review Plan Development (enclosure 5); and
- Schedules for LARP Development Tasks (enclosure 6)

To supplement this guidance, biweekly LARP team meetings and periodic Structural Task Force meetings will be scheduled to provide additional guidance and training as the work proceeds. The first biweekly LARP team meeting is scheduled for Monday, May 4, 1992, from 1:30 pm to 2:30 pm in room 4-B-11. This schedule has already been discussed with the HLWM Section Leaders and LARP team members, where possible.

Overall, the Repository Licensing and Quality Assurance Project Directorate (HLPD) will be assigned the responsibility for preparing the LARP. HLPD is charged with developing the basic policy for the review strategy as well as defining the format for the LARP. In addition, HLPD is responsible for management of the project and for ensuring that the work being done meets the schedule defined in the FY92 Office Operating Plan. The HLWM technical branches will be responsible for preparing the LARP sections consistent with the format developed by HLPD. Development of the LARP sections will be achieved using the approach described in the Systematic Regulatory Analysis of 10 CFR Part 60.

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 PDR WASTE  
 WM-1 PDR

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 414.8.1  
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The Project Manager for this task is Michael P. Lee. If you have any questions, regarding this plan, please contact him at 504-2421.

151

B.J. Youngblood, Director  
Division of High-Level Waste Management

Enclosures (6): As stated

cc: HLWM Section Leaders  
S. Treby/OGC  
W. Patrick/CNWR  
P. Mackin/CNWR  
M. Silberberg/RES  
K. Stablein/HLWM

DISTRIBUTION

BYoungblood/HLWM	MLee/HLPD	JLinehan/HLWM	RBallard/HLGE
MFederline/HLHP	JHolonich/HLPD	On-Site Reps	RJohnson/HLPD
MDelligatti/HLPD	DLoosely/PMDA	HLPD r/f	AGarcia ,HLPD
CNWR	NMSS r/f	LSS	
PDR	LPDR		

OFC :HLPD	:HLPD	:HLWM	:HLWM	:	:
NAME: RJohnson	: JHolonich	: JLinehan	: BYoungblood	:	:
Date: 05/1/92	: 05/1/92	: 05/1/92	: 05/1/92	:	:

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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The Project Manager for this task is Michael P. Lee. If you have any questions, regarding this plan, please contact him at 504-2421.



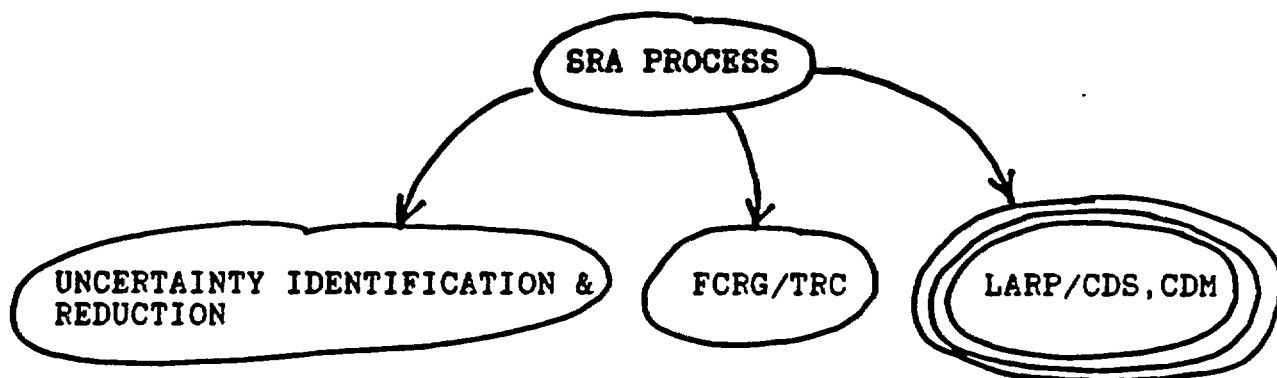
B.J. Youngblood, Director  
Division of High-Level Waste Management

Enclosures (6): As stated

cc: HLWM Section Leaders  
S. Treby/OGC  
W. Patrick/CNWRA  
P. Mackin/CNWRA  
M. Silberberg/RES  
K. Stablein/HLWM

**PLAN FOR RESTARTING THE SYSTEMATIC REGULATORY ANALYSIS**

- **Product**
- **Approach**
- **Tasks and Procedures**
- **General Schedule**
- **Resource Estimate**



DEVELOP LARP

- o FOCUS ON LARP AS THE PRODUCT AND SRA AS THE PROCESS TO DEVELOP THE LARP
- o DEVELOP LARP/REVISION 0 IN FY92
- o CONTENT OF LARP/REVISION 0
  - OUTLINE OF LARP
  - STANDARD ANNOTATED OUTLINE OF INDIVIDUAL REVIEW PLANS
  - REVIEW STRATEGY (TAKEN FROM ORS)
  - LOGIC STRUCTURE/RELATIONSHIPS OF PART 60 REQUIREMENTS AND ASSOCIATED FINDINGS
  - INDIVIDUAL REVIEW PLANS (HIGH PRIORITY)
  - STRATEGIES (CDS)
    - QA
    - LAND OWNERSHIP, WATER RIGHTS
    - NATURAL RESOURCES PACS (60.122(c))
    - GROA DESIGN CRITERIA -- SHAFTS AND RAMPS
    - SEISMOTECTONIC PACs (10 CFR 60.122(c))
    - EPA STD (10 CFR 60.112)
    - SCC & EBS (10 CFR 60.113 (a)(1))
    - FLOODING PAC
  - METHODS AND ACCEPTANCE CRITERIA (CDM)
    - NATURALLY OCCURRING MATERIALS PAC
    - GROA DESIGN CRITERIA -- SHAFTS AND RAMPS
    - REMAINING NATURAL RESOURCE PACs IF ACHIEVABLE

REVISED SRA APPROACH FOR DEVELOPING LARP

- STF WORKING GROUPS WILL PROVIDE REVISED RR/REOPs, PART 60 LOGIC STRUCTURES/MATRIX, AND LARP OUTLINE
- GROUP RRs FOR CDS AND CDM PREPARATION TO IMPROVE EFFICIENCY AND INTEGRATION
- CONTINUE TO PREPARE CDS BEFORE CDM
- DEVELOP REVIEW TYPE AND CDS TOGETHER FOR EACH RR (DO NOT TYPE ALL RRs AT ONE TIME)
- CONDUCT RR/REOP REVISION AND CDS TASKS IN PARALLEL
- CONTINUE TO DO WORK FOLLOWING CDS AND CDM PROCEDURES
- ESTABLISH A LARP WORKING GROUP
  - ONE NRC PROJECT MANAGER TO MANAGE PROJECT
  - EMPHASIS ON TECHNICAL LEADS TO MANAGE TECHNICAL TASKS
  - ASSIGN MULTIDISCIPLINARY WORKING GROUPS OF NRC AND CENTER STAFF INCLUDING PERFORMANCE ASSESSMENT
  - INVOLVE LARP WORKING GROUP MEMBERS AS NEEDED
- USE FOCUSED WORKSHOPS
- USE TRAINERS/FACILITATORS TO TRAIN AND HELP IMPLEMENT PROCEDURES



SRA TASKS AND PROCEDURES FOR DEVELOPING LARP

- OVERALL REVIEW STRATEGY
- REVIEW AND REVISE RR/REOP STRUCTURE (STF WORKING GROUPS)
  - REVISE RR/REOP STRUCTURE
  - DEVELOP LOGIC STRUCTURE/RELATIONSHIPS OF PART 60 REQUIREMENTS AND ASSOCIATED FINDINGS
  - REVISE LARP OUTLINE FROM STF REPORT (CONSISTENT WITH REVISED RR/REOP STRUCTURE AND REVISED FCRG OUTLINE)
- CDS DEVELOPMENT
  - FINALIZE CDS PROCEDURE BEFORE CDS FINAL
  - FOCUS ON GROUPS OF RRs
  - HIGH PRIORITY RR GROUPS
    - PERFORMANCE OBJECTIVES FOR 60.112 AND 60.113(a)(1)
    - NATURAL RESOURCES RRs
    - SEISMOTECTONIC RRs
    - FLOODING RR
  - GROA DESIGN CRITERIA--SHAFTS AND RAMPS RR
  - LAND OWNERSHIP WATER RIGHTS RRs
  - QA RRs
- CDM DEVELOPMENT
  - PREPARE CDM PROCEDURE
  - PREPARE TWO EXAMPLES
    - NATURALLY OCCURRING MATERIALS (OTHERS, IF ACHIEVABLE)
    - GROA DESIGN CRITERIA--SHAFTS AND RAMPS
- SYNTHESIS OF SRA OUTPUTS INTO LARP/REVISION 0

# GENERAL SCHEDULE FOR DEVELOPING LARP/REV.0

March | April | May | June | July | August | Sept |

draft A review A time A

## SRA TASKS

- Overall Review Strategy
- RE/REP Revision
- CDS Development
- CDM Development
  - procedure
  - 2 examples
- Synthesis of SRA output into LARP



▲ Major Milestone

△ Intermediate or Admin milestone

RESOURCE ESTIMATE

o NRC STAFF FTE ESTIMATE

- SRA IMPLEMENTATION FY 92 BUDGET -- 8.5 FTE
- FTE EXPENDED IN FIRST 4 MONTHS -- 2.8 FTE (5.7 FTE REMAINING)
- FTE ESTIMATED FOR SRA RESTART PLAN -- 4 to 5 FTE
- ROUGH RESOURCE ESTIMATE APPEARS TO BE WITHIN BUDGET

## FY92 LARP TEAM

Project Manager -- M. Lee

<u>TECHNICAL AREAS*</u>	<u>NRC TECHNICAL LEADS</u>	<u>CNWRA TECHNICAL LEADS</u>
General Information	M. Lee	P. Mackin
Natural System -- Climatological/ Meteorological System	R. Wescott	G. Wittmeyer
Natural System -- Geologic System	H. Lefevre	M. Miklas
Natural System -- Hydrologic System	R. Wescott	G. Wittmeyer
Geologic Repository Operations Area	M. Nataraja	A. Chowdhury
Engineered Barrier System	C. Interrante	P. Nair
Overall System	D. Codell	B. Sagar
Performance Confirmation	**	**
Land Ownership	M. Delligatti	S. Spector
Quality Assurance	K. Hooks	B. Mabrito

\* Technical areas are chapters/sections from the License Application Format and Content Regulatory Guide and LARP outlines.

\*\* Technical lead for each system.

## FY92 WORKING GROUPS FOR CDS/CDM DEVELOPMENT

<u>SYSTEMS/GROUPS/RRs</u>	<u>NRC</u>	<u>CNRA</u>
<u>Natural System -- Geologic System</u>		
- Natural Resource Group	H. Lefevre*	M. Miklas
-- Natural Occuring Materials	N. Coleman*	
-- Mining for Resources	J. Park	
-- Drilling		
-- Human Activities		
- Seismology Group	B. Ibrahim*	R. Hoffmann
-- Historic Earthquakes	HLGE TBD	
-- Frequency of Earthquakes Increasing		
-- Higher Magnitude Earthquakes		
- Volcano-Tectonics Group	J. Trapp*	G. Stirewalt
-- Igneous Activity	K. McConnell*	
-- Structural Deformation		
<u>Geologic Repository Operations Area</u>		
- Shafts and Ramps	B. Jaggannath*	J. Hageman
<u>Engineered Barrier System (EBS)</u>		
- Substantially Complete Containment	D. Dancer*	C. Tschoepe
- EBS Release Rate	T. Ahn*	
<u>Overall System</u>		
- EPA Standard	J. Park*	B. Sagar
<u>Land Ownership and Water Rights</u>		
- Land Ownership and Water Rights	M. Delligatti*	S. Spector
	K. Winsberg	
<u>Quality Assurance (QA)</u>		
- QA	K. Kalman*	B. Brient
	J. Buckley	

\* Designates NRC Staff Lead(s)

## STRUCTURAL TASK FORCE (STF) -- IMPLEMENTATION PHASE

Repository Licensing and Quality Assurance Project  
Directorate (HLWM)

- Mark Delligatti/STF Chair
- John Buckley/Quality Assurance (QA)

Geology and Engineering Branch (HLWM)

- Harold Lefevre/Natural Systems (Geology)
- Kien Chang/Engineered Barrier System (EBS)
- Banad Jaggannath\*/Geologic Repository Operations Area (GROA),  
Repository Operations

Hydrology and Systems Performance Branch (HLWM)

- Rex Westcott/Natural Systems (Hydrology/Geochemistry/Meteorology)
- Dan Fehringer\*/Overall System Performance Assessment

Office of the General Counsel

- Kathryn Winsberg/Land Ownership and General Legal

Center for Nuclear Waste Regulatory Analyses

- Pat Mackin/CNWRA Coordinator
- Steve Spector/Land Ownership and General
- Pat Laplante/General
- Mike Miklas/Natural Systems
- Bob Brient/QA
- Chuck Tschoepe/GROA/EBS
- John Hageman/Repository Operations
- Budhi Sagar\*/Overall System Performance Assessment

Office of Nuclear Regulatory Research (RES)

- Janet Lambert/RES Liaison

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\* Assistance will be augmented by other staff, as appropriate.

## GROUPING OF PRELIMINARY RR TOPICS FOR CDS/CDM/REVIEW PLAN DEVELOPMENT

<u>GROUP</u>	<u>DESCRIPTION</u>	<u>LEAD BRANCH/ SECTION*</u>
General Information	RRs for License Application, General Information	HLPD-SP (all)
	General Facility Description, Basis for Licensing Authority, Schedules	Do.
	Certification of Safeguards	Do.
	Physical Security Plan	Do.
	Site Characterization Program Review, Statement of Compliance with Performance Objectives, Summary of Performance Assessment Results	Do.
	RRs for SAR General Information	Do.
	Identification of Agents and Contractors, Material Incorporated by Reference, Use of NRC Staff Technical Positions, Requirements for Further Technical Information	Do.
	Radioactive Material	Do.
	License Specifications	Do.
	Natural System	RR for §60.21(c)(1)(ii)(A) -- Analysis of the Geology, Hydrology, etc.
RR for FC §60.122(b)(6) -- Low pop. density		HLGE-Geol./ HLHP-Hydro.
RR for FC §60.122(b)(1) -- Nature and Rate		Do.

\* Where two branches are listed-shared lead is anticipated. Within groups, individual RR leads are not provided.

<u>GROUP</u>	<u>DESCRIPTION</u>	<u>LEAD BRANCH/ SECTION*</u>
Natural System (continued)	RR for §60.21(c)(1)(i)(F) -- Integrated Response	HLGE/HLHP
	RR for §60.21(c)(1)(ii)(D) Effectiveness of Natural Barriers	Do.
Geology	RRs for §60.122:	
	§60.122(b)(5) -- Placement at 300 feet	HLGE-Geol.
	§60.122(c)(10) -- Evidence of Dissolution	Do.
	§60.122(c)(16) -- Extreme Erosion	Do.
	§60.122(c)(11) -- Structural Deformation during Quaternary	Do.
	§60.122(c)(15) -- Igneous activity	Do.
	§60.122(c)(12) -- Historic earthquakes	Do.
	§60.122(c)(13) -- Frequency of earthquakes may increase	Do.
	§60.122(c)(14) -- Higher magnitude quakes	Do.
	§60.122(c)(17) -- Naturally occurring materials	Do.
	§60.122(c)(18) -- Surface mining	Do.
	§60.122(c)(19) -- Drilling	Do.
	§60.122(c)(2) -- Human activity to affect groundwater	HLHP-Hydro.
§60.122(c)(21) -- Geomechanical properties	HLGE-Geol.	
Hydrology	RR for GWTT Performance Objective	HLHP-Hydro.
	RRs for PAC/FCs §60.122:	
	§60.122(b)(1) -- Nature and rate of hydrogeologic processes	HLHP-Hydro./ HLGE-Geol.
	§60.122(c)(3) -- Natural phenomena such as landslides	HLHP-Hydro.
	§60.122(c)(4) -- Structural deformation affecting groundwater flow	HLGE-Geol.
	§60.122(c)(20) -- Complex engineering measures	HLHP-Hydro.
	§60.122(c)(22) -- Water table rise	Do.
	§60.122(b)(2) -- Saturated zone- permeability hydraulics	Do.
§60.122(b)(7) -- groundwater travel time	Do.	

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<u>GROUP</u>	<u>DESCRIPTION</u>	<u>LEAD BRANCH/ SECTION*</u>
Hydrology (continued)	§60.122(b)(8) -- Unsaturated zone-flux, water table permeability, free drainage	HLHP-Hydro.
	§60.122(c)(1) -- Flooding	Do.
	§60.122(c)(5) -- Potential for changes in hydrologic conditions	Do.
	§60.122(c)(6) -- Changes in hydrologic conditions due to climate changes	Do.
	§60.122(c)(23) -- Perched water tables	Do.
Geochemistry	§60.122(b)(3) -- Geochem. conditions that promote precipitates or sorption, inhibit particulates or colloids and inorganics and organics, inhibit radionuclides	HLHP-Hydro.
	§60.122(c)(7) -- Groundwater Eh-pH	Do.
	§60.122(c)(8) -- Reduce sorption	Do.
	§60.122(b)(4) -- Mineral assemblages	Do.
	§60.122(c)(9) -- Groundwater conditions -- not reducing	Do.
	§60.122(c)(24) -- Potential for movement in gaseous state	Do.
Climat/Meteor.	RR for FC §60.122: §60.122(b)(8)(v) -- Climatic regime... evapotranspiration	HLHP-Hydro.
Geologic Repository Operations Area (GROA)	RR for Surface Facilities	HLGE-Geot.
	RR for Shafts/Ramps	Do.
	RR for Underground Facilities	Do.
	RR Radiation Performance Objectives	HLGE-Geol./ HLHP-PA
	RR for Interface	HLGE-Geol.
	RR for Retrievability Performance Objectives	Do.

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<u>GROUP</u>	<u>DESCRIPTION</u>	<u>LEAD BRANCH/ SECTION*</u>
Engineered Barrier System (EBS)	RR for Waste Package	HLGE-Mat.
	RR for Waste Form	Do.
	RR for Underground Facility.	HLGE
	RRs for Containment and Release Performance Objectives	HLGE/HLHP
	RR for Effectiveness of Engineered Barriers	HLGE-Mat.
Overall System Performance	Either one RR or three RRs to reflect EPA standard structure	HLHP-PA
Repository Operations	RR for Rad. Protection Program	HLGE-Geol./ HLHP-PA
	RR for Maintenance	HLGE (all)
	RR for Organizational Structure	Do.
	RR for Procedure Development	Do.
	RR for Records and Reports	Do.
	RR for Training Programs	Do.
	RR for Schedules	Do.
	RR for Operating Controls and Limits	Do.
	RR for Preservation of Records	Do.
RR for Site Markers	Do.	
Performance Confirmation (PC)	RR for Natural System PC	HLGE-Geol./ HLHP-Hydro.
	RR for GROA structures, systems and components PC	HLGE-Geol.
	RR for EBS PC	HLGE-Mat.
	RR for Radiation Protection PC	HLHP-PA
	RR for Changes to PC Baseline	HLHP

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<u>GROUP</u>	<u>DESCRIPTION</u>	<u>LEAD BRANCH/ SECTION*</u>
Performance Confirmation (continued)	RR for Unresolved Safety Questions	HLPD
Land Ownership	RR for Land Ownership and Control	OGC
QA	RR for QA	HLPD-QA
Emergency Planning	Reserved	

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\* Where two branches are listed-shared lead is anticipated. Within groups, individual RR leads are not provided.

## BREAKDOWN OF PRELIMINARY RR LIST BY BRANCH AND SECTION\*

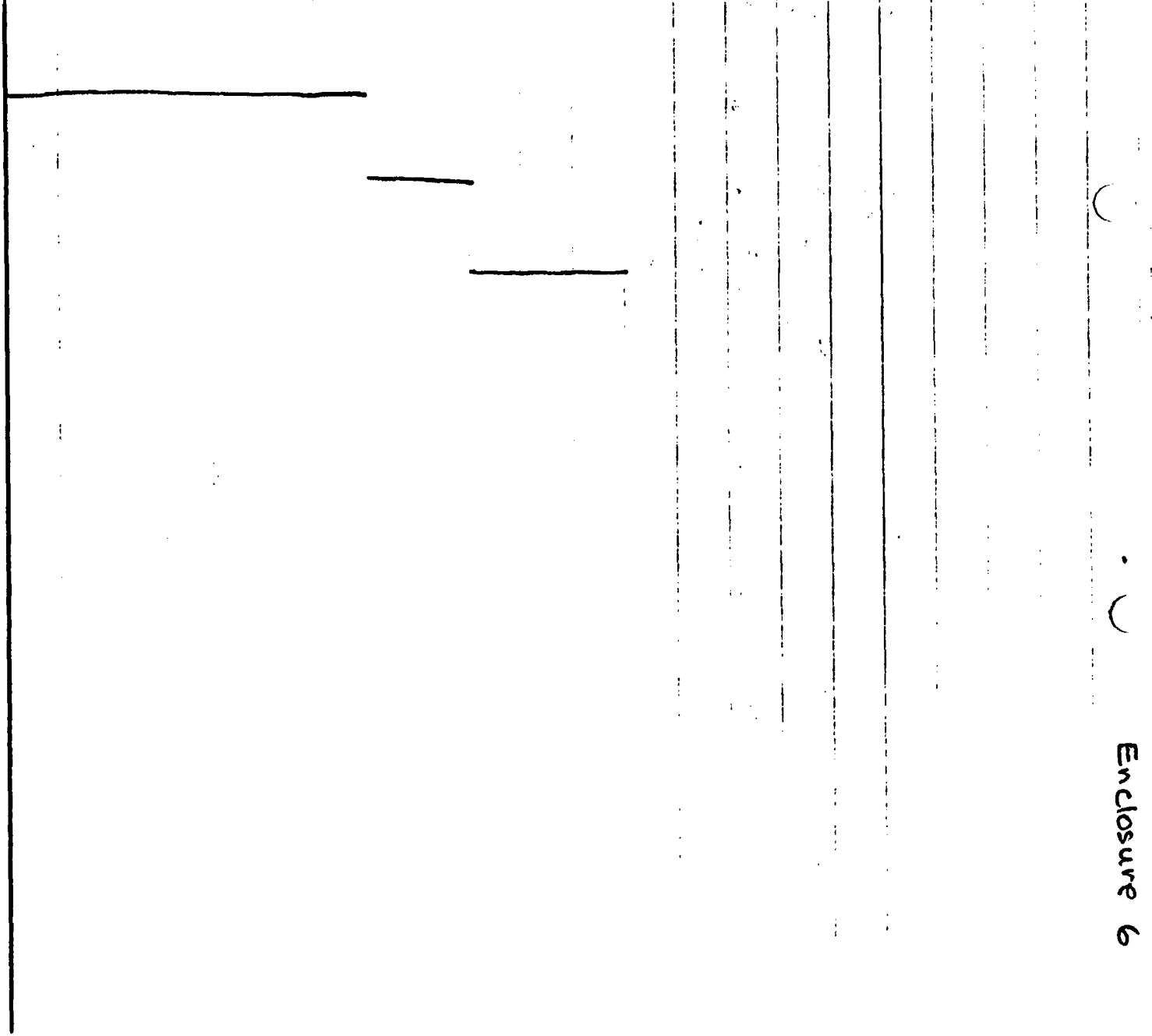
<u>BRANCH/SECTION</u>	<u>NUMBER OF REGULATORY REQUIREMENTS (RRs)</u>
<u>Repository Licensing and Quality Assurance Project</u>	
<u>Directorate (HLPD)</u>	
Special Projects	All General Information RRs corresponding to Chapters 1 and 2 of the FCRG.
Quality Assurance	1 RR
<u>Hydrology and Systems Performance Branch (HLHP)</u>	
Hydrology	21 RRs (note 19 are PAC/FC RRs which may benefit from a combined rationale and a "template" RR/REOP structure).
Performance Assessment (PA)	2 RRs (note Total system performance may be Divided into three RRs for a PA total of 4)
<u>HLHP TOTAL RRs</u>	<u>24</u>
<u>Geology and Engineering Branch (HLGE)</u>	
Geology	14 RRs (13 are PAC/FC RRs -- see HLHP hydrology)
Materials	4 RRs (includes new DBA RR)
Geotechnical	15 RRs (10 are for Repository Operations, several of which are quite simple)
HLGE joint	1 RR (shared responsibility among all HLGE sections)
<u>HLGE TOTAL RRs</u>	<u>34</u>
<u>HLHP/HLGE</u>	
Joint Responsibility	<u>9</u> RRs
<u>Office of the General Counsel</u>	
Singular Responsibility	<u>1</u> RR

\* The Structural Task Force may find it necessary to further refine this list either by consolidation, separation, or through a determination that other RRs must be developed to ensure that all regulatory requirements are addressed.

OVERALL REVIEW STRATEGY  
DEVELOPMENT

MARCH	APRIL	MAY	JUNE	JULY	AUG	SEPT	
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- Prepare draft
- Review draft
- Prepare final



RR/REOP REVISION  
(STF)

	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEPT
- TRAINING/BACKGROUND		—					
- PART 60 LOGIC STRUCTURE		—					
- PART 60 MATRIX			—				
- REVISE RR/REOPS (ARP OUTLINE)			—	—	—		
- SYSTEM REVIEW OF ALL REOPS				—			

CDM

CDS

LAND OWNERSHIP + CONTROL

QUALITY ASSURANCE  
QA

SHARPE/BRANDS  
MEDICAL RESISTANCE  
OPERATIONS AREA

60.113

ENGINEERED BARRIER SYSTEM

60.112

OVERALL SYSTEM

LOADING

VOLCANO-TERTIARY GROUP  
- MICROLOGIC SYSTEM -

SEISMOLOGY GROUP

NATURAL RESOURCES GROUP

NATURAL SYSTEM  
- GEOLOGIC SYSTEM -

CDM/CDM  
DEVELOPMENT

MARCH

APRIL

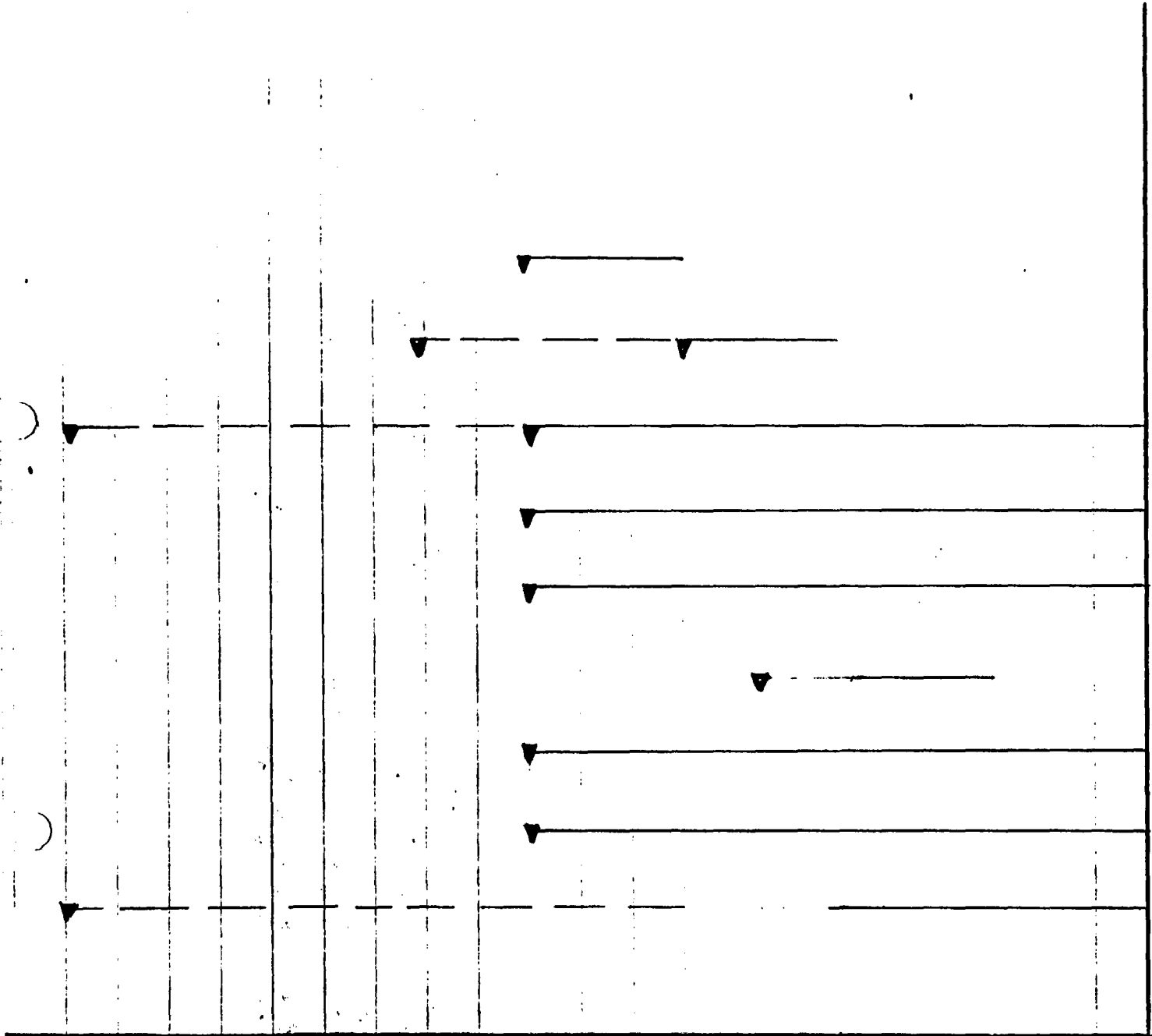
MAY

JUNE

JULY

AUG

SEPT



# MAJOR REACTIVE REVIEWS

	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEPT
WALK-THROUGH TO SCA OBJECT. #1 AND COMMENTS		_____					
NAS REPORT ON COUPLED PROCESSES		_____					
EARLY SITE SUITABILITY EVALUATION		_____					
SCP PROGRESS REPORT					_____		
DGE PERFORMANCE ASSESSMENT		_____					
TOPICAL REPORTS EROSION CA/31				_____			_____
STUDY PLANS  CHEM 8.3.1.3.2.2	_____						
H7D20 8.3.1.5.1.3		_____					



OTHER MAJOR

PRACTICE ACTIVITIES

DBE RENEWALING (RM)

COMPLETE RM PACKAGE/  
TRANSUIT TO ACHU

REVISE ACHU

RECEIVE COMMENTS

DIVISION DIRECTOR/  
OFFICE DIRECTOR  
OPUCURRENCE

TRANSUIT TO EDO

IPA "PHASE 2"

COMPLETE MODELS

PERFORM TRIAL  
RUNS

PERFORM PRODUCTION  
RUNS

PREPARE  
DOCUMENTATION

PREPARE SUMMARY  
REPORT

	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEPT
DBE RENEWALING (RM)							
COMPLETE RM PACKAGE/ TRANSUIT TO ACHU							
REVISE ACHU							
RECEIVE COMMENTS							
DIVISION DIRECTOR/ OFFICE DIRECTOR OPUCURRENCE						(REVISE)	
TRANSUIT TO EDO							
IPA "PHASE 2"							
COMPLETE MODELS							
PERFORM TRIAL RUNS							
PERFORM PRODUCTION RUNS							
PREPARE DOCUMENTATION							
PREPARE SUMMARY REPORT							

SCENARIOS  
TECH. SACH.