

PB 6/26 M1 BALLARD

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JUL 9 1987

MEMORANDUM FOR: Ronald Ballard, Chief
Technical Review Branch, HLWM

FROM: John J. Linehan, Acting Chief
Operations Branch, HLWM

SUBJECT: ANNOTATED OUTLINE FOR GENERIC TECHNICAL POSITIONS

Enclosed for your review is an annotated outline for Generic Technical Positions (GTPs). This document formalizes guidance on the scope, purpose and content of GTPs that has been jointly developed with the technical staff through discussions and experience over the past few years. The guidance allows for a flexible product; the length may range from two to several pages and the subject matter may be simple guidance regarding interpretation of regulatory requirements or terminology, or a complex methodology for demonstrating compliance with regulatory requirements.

Once the annotated outline is finalized, we then need to work on a more efficient process for developing GTPs so as to minimize impact on staff resources.

Since the outline presents the approach developed by our staffs over the past few years, I do not anticipate the need for extensive review and comment and request that you provide any comments by July 24, 1987.

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John J. Linehan, Acting Chief
Operations Branch, HLWM

Enclosure:
Draft Annotated Outline

cc: R. Browning
M. Bell
J. Bunting

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ANNOTATED OUTLINE
(To Standardize Generic Technical Positions)

A. General Guidance to Authors of GTPs

The primary purpose of a GTP is to tell DOE what needs to be done to resolve a particular issue or concern or to demonstrate compliance with a particular portion of 10 CFR 60. A GTP should be non-prescriptive. Approaches or methodologies described should be presented as examples of what would be acceptable to the staff, rather than telling DOE how they must resolve an issue or demonstrate compliance.

The audience for a GTP is multiple: DOE, States, and Tribes, including both managerial and technical persons. Thus, authors should use clear, non-ambiguous terms and clear, consistent lines of logic that are understandable to the general technical reader. This does not mean that very technical guidance cannot be offered. Rather, detailed technical material should be subordinated to the main line of discussion.

The GTP should be concise and non-repetitious. The following outline provides a streamlined structure for concise, non-repetitious GTPs.

B. Outline for GTPs

Title Page:

Generic Technical Position on ----
Branch/Division
Agency
Date

Table of Contents:

Section and subsection numbers; section and subsection titles and appropriate page numbers.

(All numbering of sections and subsections should follow the multiple decimal system).

List of figures.

1.0 INTRODUCTION

(This section should include statement of purpose, scope, and plan of development in that order).

- Purpose: As an introduction, simply state that the purpose of this (draft) Generic Technical Position is to provide guidance to the DOE on ... (subject matter of GTP). A statement on the relevance of the subject to the HLW program at this particular time may be added.
- Scope: amplify the purpose by discussing how broad and conversely, how limited the treatment of the subject will be.
- Plan of Development: Briefly and specifically state what will be covered in the following sections of the document.

2.0 REGULATORY BACKGROUND

Focus on specific references to applicable NRC regulations

- Connect the regulations to the position by stating the questions about the regulation(s) that the technical position will address.
- If necessary for a particular subject, include ASME or ANSI standards.
- If necessary to set context may refer to legislative acts; eg. "Under NHPA, the NRC implements the EPA standard..."
- Pertinent information from Part 60 supplementary information should also be addressed.
- Pertinent legal and historical background may be added if it helps clarify the position.

3.0 TECHNICAL POSITION*

A brief, clear and concise statement of the staff's technical position(s) without any discussion. Should the technical position consist of more than one technical point, each should be stated separately and numbered, to extent the subject matter allows. Each technical position should be completely stated so it is reasonably self-standing with minimum need for referencing other documents or other parts of the GTP. The position(s) should state clearly that an acceptable approach has been given, but other approaches, suitably supported, may be equally acceptable.

*In some cases dealing with a complex position (e.g. an acceptable methodology) to avoid unnecessary repetition it may be advisable to combine discussion with position statements as long as the technical position is clear and the discussion is clearly labeled as such. See example at end.

4.0 DISCUSSION

The principal part of the GTP is the discussion regarding the technical position(s) stated.

- Discussion should provide the basis and supporting rationale for each technical position point. A defensible supporting argument anticipates reasonable counter arguments and alternative technical views to those being taken.
- In general, discussions for positions should be presented in the same order and numbered as the positions are presented in Section 3.0. In some instances, however, the supporting logical argument is best presented for a group of position points.
- If there are two or three terms essential for understanding the position(s) presented in this document, provide definition for this. Definitions should be consistent with definitions provided in existing NRC HLWM program documents.
- Should explain the stated position(s) and discuss fundamental reasons for the positions taken. These should be presented in a traceable fashion so that the logic behind the position can be easily followed.

5.0 REFERENCES

- List of cited documents only

6.0 BIBLIOGRAPHY

- Should list documents that are not explicitly cited, particularly for descriptive or critical notes relating to the subject.

APPENDIX:

- A. Glossary - If acronyms and technical terms that may be difficult to understand have been used, definition should be provided here. All definitions should be consistent with existing NRC HLWM program documents.
- B. Other appendices - This subsection may contain calculations, figures, and schematics that would support discussions.

Example of Combining Discussion Clearly with Other Text (See footnote, p.2)

One way to combine discussion and position is to use the following format.

3.0 TECHNICAL POSITION AND DISCUSSION

An approach to that NRC staff finds acceptable is described and discussed in the following subsections. Other approaches, etc.

3.1 Describe the first step

Discussion

3.2 Describe the next step

Discussion

etc.