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WM Record File 102

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WM-86578

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SEP 12 1986

MEMORANDUM FOR: Joseph O. Bunting, Chief
Policy and Program Control Branch
Division of Waste Management

FROM: Philip M. Altomare, Section Leader
Program Planning Section
Policy and Program Control Branch

SUBJECT: REVIEW OF DRAFT "NNWSI PROJECT INFORMATION MANAGEMENT SYSTEM CONCEPTS EVALUATIONS REPORT" (WM-86578)

Comments on the subject report are enclosed for your information.

Original Signed By:

Philip M. Altomare, Section Leader
Program Planning Section
Policy and Program Control Branch

Enclosure:
As stated

Information on enclosure transmitted to Karen Hatch, NNWSI 9/12/86 JMJ

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Review of Draft "NNWSI Project Information Management System Concepts Evaluation Report" of May 1986

P.M. Altomare, Sept. 9, 1986

This report is excellent in its discussion of document management concepts and is recommended reading for those concerned with the development of a Licensing Support System for use in the high-level waste (HLW) repository hearing. However, I do not entirely agree with the approach or conclusions. Comments are provided below.

1) The document used Technical Criteria and Cost to evaluate six systems, three using microfilm and 3 using page image and full text retrieval.

a) The system concepts selected may not be the best to support a HLW repository hearing.

b) Different criteria, weights and ratings could easily be envisioned and no information was given as to how the ratings were obtained i.e. a single opinion, delphi method etc.

c) The only clear division is that electronic image and full text are better than microfilm systems. Five year cost is about 20 million for all systems

2) It is not clear that labor cost for the day to day staff search and retrieval of documents is considered. Electronic systems could make a substantial difference here. DOE appears to treat the licensing document system as separate from day-to-day usage, e.g., there is an implication that they have two systems one for day-to-day usage by the staff and one to keep information they plan to release at the time of licensing. This could be a duplication cost.

3) The document recommends that only information passed between project participants and the project office be included in the system. This would cut down on the number of documents and still capture 70% of the licensing documents.

a) as above, what do they do with the other documents for day to day use and at what cost

b) losing 10% of the licensing documents could result in more and longer discovery actions costing more in delays than is saved and the three year licensing hearing required by the Nuclear Waste Policy Act (NWPA) probably would not be met.

4) The concept of using full text to generate a controlled word index is very imaginative and interesting, however, as I understand their concept, they do not use full text search to find documents, only full text search of abstracts. They do capture full text in three of their concepts and abstracting is very expensive. The basis for not using full-text search when full text is available is not clear

5) There is no clear indication of what records have to go into the system.
   a) there is an indication that some records would be restricted distribution but no criteria is given nor are the implications of FOIA and discovery discussed in detail
   b) The NRC Negotiated Rulemaking effort must be considered in any system design (including procedures).
   c) Common procedures need to be developed for use by all parties to a licensing hearing i.e. DOE Headquarters, Project Offices, NRC, States and Indian Tribes

6) The document stressing indexing rather than full text for search and retrieval of documents. The needs of "recall and precision" in a three year licensing hearing needs to be considered

(p 91)

7) the document indicates that nonerraseability of optical disk is a disadvantage. where it is desired to protect against record tampering this is an advantage.

8) It is noted that optical disk are the only readily accessable electronic storage media for the size of data base needed (p 117). I believe this is true.

9) Photographs are not planned (p 134) to be converted to digital images. I believe this is possible with todays technology.

10) The document indicates that labor costs are higher for a distributed versus a centralized system (p 176). This may not be true when substantial data input may originate at the distributed site i.e. the concepts used might be reconsidered.

11) The document notes wisely that the best system selection will be that which offers future cost reductions i.e. the electronic system.

12) I agree with the pilot project approach to test concepts and would like to coordinate with DOE to share theirs and our experience

In summary, I believe this is an excellent report although I do not feel that the concepts considered covered ~~all~~ some of the desirable possibilities. I do not therefore support all of the conclusions particularly as regards obtaining only 90% of the licensing information, the approach to what should or should not go into the system and the limitation on searching available full text to increase recall and precision in finding documents.

Phil Altomare

FROM	DATE OF DOCUMENT	DATE RECEIVED	NO
U.S. DOE Donald L. Vieth	6/18/86	6/27/8[illegible]	WM86-578

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Joseph P. Bunting		XX	

ACTION NECESSARY	XX	CONCURRENCE	☐	DATE ANSWERED
NO ACTION NECESSARY	☐	COMMENT	☐	BY ~~7/11/86~~

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DESCRIPTION (Must Be Unclassified)	REFERRED TO	DATE	RECEIVED BY	DATE
Draft Concepts Evaluation Report on NNWSI	JO Bunting, WMPC	6/27		
	P. Altomare	6/27		

ENCLOSURES

[illegible] on 9/12/86

REMARKS

Rec. 6/27/86

[illegible] 7/9/86

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