

CNWRA890055/PASS MS LEVELS

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JUN 15 1989

Mr. Allen R. Whiting, Director
 Systems Engineering and Integration Department
 Center for Nuclear Waste Regulatory Analyses
 P.O. Drawer 28510
 6220 Culebra Road
 San Antonio, Texas 78284

Dear Mr. Whiting:

SUBJECT: NRC CONCURRENCE ON THE "RECOMMENDED LEVELS OF SCHEDULES FOR IMPLEMENTATION IN PASS"

We have reviewed the subject document submitted by your facsimile transmission of May 31, 1989. In the letter accompanying the May 31 submission it was requested that U.S. Nuclear Regulatory Commission (NRC) staff review, comment, and/or concur on the proposed project management features of the Program Architecture Support System (PASS) necessary to support the commitments made at the joint NRC/Center for Nuclear Waste Regulatory Analyses (CNWRA) meetings of May 18-19, 1989.

As noted in our May 18-19 meeting, NRC supported the development of milestone levels to that level encompassing the "proactive" and "reactive" programs defined in SECY-88-285 and in the Division of High-Level Waste Management (DHLWM) FY89 Division Operating Plan (DOP). We felt that this level of detail was necessary in order to illustrate (1) how NRC was supporting the U.S. Department of Energy's (DOE's) High-Level Waste (HLW) program production schedule, (2) how NRC was reducing uncertainty in the Nuclear Waste Policy Act, as amended, (NWPAA/NWPAA) HLW program, and (3) where NRC's and the CNWRA's respective HLW programs were interfacing. NRC concurred on the Center's milestone tracking proposal in concept during the May 18-19 meetings; the staff continues to support the recommended approach.

We have one major comment and it concerned understanding what information would appear at the milestone levels designated as "2" and "3." Although it is clear what information would appear in PASS for milestone levels 0 (NWPAA/NWPAA) and milestone level 1 (PDS), it was not especially clear to the NRC reviewers what types of information would actually appear at the milestone level 2 (NRC's Technical Programs) and later in milestone level 3. In this regard, a statement of the types of information in milestone levels 2 and 3 would be desirable. We suggest that in order to be consistent, that milestone level 3 should represent the projects inherent in each NRC program defined previously under milestone level 2. This information currently resides in the DOP. In this manner, Center activities could be represented and tracked, as is the case in the DOP to a limited extent, and in greater detail (e.g., milestone level 4) in the Center's Commitment Control Log.

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In closing, we recommend that you proceed with developing this project management feature of PASS, consistent with your plans for continued analysis of NRC's HLW management system and the comments contained herein. If you have any questions concerning our review, please contact me or Mike Lee.

Sincerely,

ORIGINAL SIGNED BY

Philip M. Altomare
CNWRA Program Element Manager
Waste Systems Engineering
and Integration

Enclosure: As stated

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SPECIFIC COMMENTS AND DISCUSSION POINTSMilestone Level 0

As a matter of reference, it should be noted that there are six statutory requirements at the milestone level 0 level of resolution that "fix" the timing as well as the sequence of milestones between the respective NWPAN/NWPAA programs. These correlation points and the walk-through between the programs in question should also be included as a milestone level 0 feature in PASS.

Milestone Level 1

Content -- It should be noted that section 114(3)(1) of NWPAN, as amended, requires the preparation of a Project Decision Schedule (PDS) for the purpose of identifying all "objectives," "activities," and "schedules" necessary to achieve the operation of only the repository. As the HLW program is integrated in nature, the PDS requirement should, in retrospect, apply to all NWPAN/NWPAA programs for which there are engineering or design interfaces, and not just to the repository. Furthermore, it could be argued that this requirement could be extended to the Defense Waste Processing Facilities as well. However, it would appear that DOE has recognized the need for this additional level of detail as they have included some of what is regarded as milestone level 1 information (for the MRS and transportation programs only) in its current PDS. This information appears to have been derived from DOE's Monitored Retrievable Storage Program Plan (March 1987) and the Transportation Instructional Plan (August 1986). It is not clear, though, how complete or comprehensive this information is, or how consistent it is with the requirements of the repository.

Rationale/Requirement -- Again, as the PDS has been tracking only the repository program, this statement is incorrect.

Note: Although the origin of many of the level 1 milestones can be traced to the PDS or the statute itself, several milestones have origins that are regulatory in nature (e.g., 10 CFR Part 2, 10 CFR Part 50, and 10 CFR Part 60), and the discussion should reflect this.

Milestone Level 2

Content -- As previously noted, the milestone level 1 level of detail identifies those NRC activities and events necessary to support the DOE production schedule. At present, there are 15 major NRC programs distributed between four broad programmatic headings that support DOE's schedule. Because the Center is supporting both NRC's "proactive" and "reactive" programs in response to the milestone level 1 requirements, we would expect to see some initial information on those Center activities supporting milestones at the level 2 level of detail as well as at the level 3 level of detail, as currently proposed.

SPECIFIC COMMENTS AND DISCUSSION POINTS (continued)Milestone Level 3

Content -- Under this milestone level designation, we would expect to see the specific projects supporting the 15 major programs previously described and as contained in the Division Operating Plan. Included with this description would be some of the Center's programs and schedules, as appropriate. As presently described, it sounds like NRC's program description ends at milestone level 2 and the Center's begins at milestone level 3.

Milestone Levels 4 and 5

Content -- As presently described, milestone levels 4 and 5 are primarily for internal Center use. Although this level of detail has not been developed internally by the DHLWM, the Center is free to develop what additional milestone levels it feels are necessary to support the internal management of those programs approved under the FFRDC contract.