

CNWRA890057/TOP-001-04

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JUL 12 1989

Mr. Allen R. Whiting, Director  
 Waste 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 COMMENTS ON TECHNICAL OPERATING PROCEDURE (TOP)-001-04 --  
 SELECTION OF REGULATORY TOPICS FOR PROGRAM ARCHITECTURE ANALYSIS

This letter is a follow-up to our telephone conversation of June 30, 1989 and to the previous telephone conversation between Mark Delligatti and Bruce Mabrito on the above subject. As noted during these conversations, work performed prior to the issuance of the Center's Quality Assurance Manual (CQAM) must be documented in order to be in compliance with final CQAM. Under the "Purpose and Scope" section of this TOP, the use of the phrase "Although a decision was made to conduct the initial selection without strict procedural control" implies that NRC approved a deviation from the quality assurance (QA) requirements of the contract, which is not the case. Accordingly, this phrase should be omitted. Please discuss the QA requirements for documentation of prior work with Mr. Mabrito and ensure that this meets with the approval of Mr. Delligatti.

It is also noted that TOP-001-04 does not provide for an overview of the regulatory requirements to evaluate whether there has been an omission in a regulation, i.e., whether the pertinent regulations are sufficient and complete. While we hope that there are no omissions, it must be recognized that omissions could occur and they may be made evident by the disclosure of new information. A procedure for the evaluation for potential regulatory omissions could perhaps be incorporated in Section 5.6 as part of the "systems" functional analysis.

Recognizing that this and all other TOPs are subject to configuration control, I suggest that the changes discussed herein be incorporated into a forthcoming revision of TOP-001-04.

Sincerely,

ORIGINAL SIGNED BY

Philip M. Altomare  
 CNWRA Program Element Manager  
 Waste Systems Engineering and  
 Integration  
 Division of High-Level Waste Management

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