

LETTER TO SAGAR

- 1 -

MAY 17 1990

Dr. Budhi Sagar, Manager  
 CNWRA PA Performance Element  
 CNWRA/San Antonio Office  
 Southwest Research Institute  
 6220 Culebra Road  
 San Antonio, Texas 78228-0510

Dear Dr. Sagar:

SUBJECT: WORK PLAN FOR SUBTASK 2.1, PERFORMANCE ASSESSMENT

Enclosed is a copy of a work plan for Subtask 2.1, Rules and Amendment Support to Conform to the EPA Standard. This work plan has been agreed to and signed by both of us. It describes the one remaining subtask in Task 2 of the Performance Assessment element, Regulatory and Technical Guidance Development, after the transfer of funds into Task 5 of the PA element.

The work plan does not represent a change of scope. The work plan for this rulemaking support does not follow the standard steps for rulemaking assistance because the staff's activity on this rulemaking is well underway and the timing of future steps is highly dependent on EPA's issuance of their standard.

No intermediate or major milestones have been defined for this task. The informal letter report named as the deliverable for activity 2.1 is an interface point. It was received and accepted April 9, 1990.

Sincerely,

131

Pauline Brooks, Program Element Manager  
 Performance Assessment  
 Geosciences and Systems Performance Branch  
 Division of High-Level Waste Management, NMSS

Enclosure:  
 As stated

cc: S. Mearse, ADM/CNB1  
 J. Funches, PMDA/NMSS  
 S. Fortuna, PMDA/NMSS  
 B. Stiltentpole, PMDA/NMSS

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LETTER TO SAGAR

- 2 -

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**WORKPLAN FOR PERFORMANCE ASSESSMENT TASK 2.1 IN FY 90-91**

**I. BACKGROUND**

The purpose of this workplan is to define the work to be accomplished in FY 1990-1991 under Subtask 2.1 of Task 2, Regulatory and Technical Guidance Development, of the Performance Assessment Element. Under Subtask 2.1 the CNWRA provides Rules and Amendment Support to Conform to the EPA Standard. As the NRC staff's schedule for preparing "conforming amendments" to Part 60 is dependent upon the EPA's schedule for reissuing its High Level Waste standards, the emphasis for FY 1990 is on CNWRA support in the development of background information for the rulemaking, Activity 2. Schedules for this support must necessarily be flexible.

**II. TASK DESCRIPTION**

- Activity 1. Support Development of the Scope of the Rulemaking**
- As requested by the NRC, CNWRA shall provide Systems Regulatory Analysis and technical input to support NRC staff development of the rulemaking scope.
- Activity 2. Support the Development of Background Information for the Rulemaking**
- The objective of this activity is to provide technical support to NRC staff.
- 2.1 Provide a written overview of the sources of uncertainty and techniques for treating those uncertainties in demonstrating compliance with an overall system standard.
- The deliverable for this task is an informal letter report.
- 2.2 Provide written comments on any draft Commission Paper prepared in connection with the rulemaking as requested.
- Activity 3. Support the Preparation of an Internal Draft Rulemaking**
- The CNWRA shall support NRC staff by using Systems Regulatory Analysis to evaluate the completeness and internal consistency of the NRC staff's draft conforming amendments to Part 60.
- Activity 4. Support the Evaluation and Incorporation of Internal Draft Review Comments and Preparation of a Draft Rulemaking**
- Activity of this type by the CNWRA in support of this rulemaking shall be undertaken as requested by the NRC.

WORKPLAN 2

- 2 -

- Activity 5. Support the Evaluation and the Resolution of Public Comments on the Draft Rulemaking
- The objective of this activity is to provide technical support to the NRC staff.
- 5.1 The CNWRA shall provide assistance to NRC staff in responding to public comments.
- Activity 6. Support NRC Staff at the Public Comment Resolution Meeting
- If such a meeting is held, activity of this type by the CNWRA in support of this rulemaking shall be undertaken as requested by the NRC.
- Activity 7. Support NRC Staff at the ACNW Meeting on the Final Draft, and Provide Assistance with the Resolution of Comments
- Activity of this type by the CNWRA in support of this rulemaking shall be undertaken as requested by the NRC.

III. ESTIMATED LEVEL OF EFFORT

B. Sagar:	125 hours
R. Weiner:	250 hours
Professional Level 2:	125 hours

IV. SCHEDULE/MILESTONES: (MAJOR AND INTERMEDIATE)

None of the deliverables for this task are major or intermediate milestones. Dates for interface points are incorporated in the description of activities.

V. CONTACT(S)

D. Fehring, NRC

Pauline Brooks 4/19/90  
Pauline Brooks Date  
NRC Program Element Manager  
Performance Assessment

Budhi Sagar 5/19/90  
Budhi Sagar Date  
CNWRA Element Manager  
Performance Assessment