FUNCT WORKPLAN/6/20/90

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Mr. Ted Romine Center for Nuclear Waste Regulatory Analyses Southwest Research Institute 6220 Culebra Road San Antonio, Texas 78228-0510

SUBJECT: APPROVAL OF FUNCTIONAL ANALYSIS WORK PLAN AND PREPARATION OF TECHNICAL OPERATING PLAN FOR "NUCLEAR WASTE MANAGEMENT SYSTEM FUNCTIONAL ANALYSIS"

Dear Mr. Romine:

The Draft Functional Analysis Work Plan, forwarded by your letter of June 7, 1990, is approved subject to the following items as have been discussed in our telephone conversation:

- 1. It is understood that the work plan covers the full functional analysis effort to determine "sufficiency" of 10 CFR Part 60 although the work plan discusses primarily the relationship to the Repository Operation Criteria which is the major part of the analysis.
- 2. It is understood that the Functional Analysis "depth" of detail will be limited by consideration of whether functions are safety related, as well as the Technical Operating Procedure (TOP) limitation of requiring design or siting assumptions.
- The plan will be extended to include an appropriate review or involvement of the NRC staff to obtain the benefit of their expertise.
- 4. A formal report will follow the interim letter report of the work plan which will be complimentary to the parent effort reported in CNWRA 90-003, "Identification and Evaluation of Regulatory and Institutional Uncertainties in 10 CFR Part 60," and which will develop any uncertainties identified to the same level of definition and rationale as for that report.
- 5. Please delete Jerry Pearring as technical lead on this task.

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426.1 WH-11 Please proceed to prepare the TOP, Nuclear Waste Management System Functional Analysis," for NRC approval. The TOP should incorporate experience gained to date and also, should incorporate the "test for completeness" concept suggested in the May 25, 1990 meeting and letter to you of June 1, 1990. It is also suggested that Functional Analysis has a broad application and might be written more generically rather than just for the repository Functional Analysis application.

Sincerely,

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Philip M. Altomare, WSE&I Program Element Manager

cc: S. Mearse, NRC, CAB
J. Funches, NRC, PMDA

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The action taken by this Technical Direction is considered to be within the scope of the current contract NRC-02-88-005. No changes to cost or delivery of contracted services and products are authorized. Please notify me immediately if you believe that this Direction would result in changes to cost or delivery of contracted services or products.

Sincerely.

Philip M. Altomare, WSE&I Program Element Manager

cc: S. Mearse, NRC, CAB J. Funches, NRC, PMDA

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