

OCTOBER 3, 1989

NOTE TO: Phil Altomare

FROM: Jerome Pearring

SUBJECT: REVIEW OF DRAFT RR 1002 SUBSTANTIALLY COMPLETE CONTAINMENT
PROGRAM ARCHITECTURE DATA

At your request I have reviewed the subject document and consider the following comments appropriate.

- 1) The chart titled "REG. REQ. 1002-SUBSTANTIALLY COMPLETE CONTAINMENT ELEMENT OF PROOF LOGIC DIAGRAM" is very helpfull as an aide to understanding the relationship of the various elements of 10CFR60 to this topic.
- 2) The Regulatory Requirement Input Form, which apparently contains a number of data blocks necessary to the control of the data base in addition to the data blocks necessary to developing the Regulatory Requirement topic itself, is very difficult to work with as one must search through a number of data blocks to find the data one needs. Perhaps a restructuring of the form could be worked out such that all included Regulatory Text citations and the rational for their inclusion or exclusion (data blocks 3.5a, 3.5c, 3.6a, and 3.6c) could be grouped to the front of the form and the other data blocks moved to follow.
- 3) The Uncertainty Input Form, the Potential Composite Uncertainty Form, and the Uncertainty Component Input Form are also difficult to work with for the same reason as above. Consideration of a restructuring of these forms to add to their utility to NRC technical staff reviewers is requested.
- 4) Both the Regulatory Element of Proof Set Input Form and the Individual Regulatory Element of Proof Input Form are easy to work with, as most of the data blocks of primary interest to an NRC technical reviewer are grouped in close proximity to each other.
- 5) The utility of a sepearte Technical Review Component Set Input Form for each of the 16 TRC sets is not apparant. Record 6.8 and 6.10 do not present substantive information related to the rationale for logic relationships nor do they present substantive comments related to why and how the specific technical review components that are presented were developed. As Individual Technical Review Component Input Forms have not been provided, it is not possible to judge the overall value of this form to an NRC Technical reviewer.
- 6) The Alternative Individual Program Analysis Input Form is a very useful form to an NRC technical reviewer. As used in this Regulatory Requirement database it provides, at this early time in the developmont of the total data base, by far the most information of importance, more--so than in all the other forms. Perhaps there is another title that can be given to it to highlite the fact that it provides information regarding the status of efforts underway related to the Regulatory Requirement.
- 7) As presented in this Draft submittal the format of the forms on NRC Compliance Determination Method offer great promise of utility to an NRC technical reviewer. However as filled in they are of little to no

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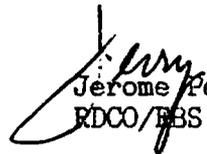
utility. In the main the information presented is directed to answering the question "What is to be done?" rather than "How is it to be done?". As filled in, section 12h of the form contains no information addressing development of a compliance determination method that is sufficiently specific and detailed to provide the basis for identifying future "Information Requirements" for record 20. In addition no mention or reference is made to the uncertainty related to the term "substantially complete containment" or to the on-going feasibility study directed toward development of technical data which would impact compliance determination methods.

- 8) Record forms for many required records such as records for Uncertainty Components and Information Requirements are not included in this Draft.

In addition I have reviewed the print out of Elements of Proof, Technical Review Components, and Compliance Determination Methods presented as a supplement to the Program Architecture forms provided. While the results of the development of the implicit Technical Review Components has provided a high order review component that does answer the question " what does DOE have to demonstrate?" in a general way, the effort to identify how NRC will determine compliance has not documented any specifics as to how it is to be done. As I have already stated in my comment 7 above , I feel that much more specific detail of technical compliance determination methodology needs to be input to this record.

In summary my review of the formatting of the Program Architecture data base indicates that while some progress has been made in developing a usefull product that is somewhat "user friendly" for technical reviewers it appears that additional refinements would be helpful. Furthermore in regards to the specific data base content of the Draft RR 1002 Substantially Complete Containment there is very little substantive technical content presented at this time. Although it is recognised that much of the compliance determination method for some of the Technical Review Components is currently under review in association with the Substantially Complete Containment Feasibility Study, at least some attempt could, and should, be made to document those records with a reference to that fact. Furthermore the Compliance Determination Method record for those Technical Review Components that will be unaffected by the feasibility should be appropriately completed.

If you would care to discuss any aspect of my above comments, please feel free to contact me at your convenience on x20508.


Jerome Fearing
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cc: J. Bunting
R. Weller
C. Peterson
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