



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D. C. 20555

October 2, 1989

Memorandum For: Phillip Altomare
 NMSS

From: Bradley W. Jones 
 OGC

Subject: Required Data for Program Architectural Support System

As requested during our meetings at the Center, I have been reviewing the definitions of records for the Program Architectural Support System to determine which records must be on the system to prepare for efficient litigation at the licensing hearing for the high level waste repository. In order to compile this list, I have assumed that there are no contentions in the proceeding. What follows is the minimum information I would want, for presentation to the Licensing Board, to demonstrate the basis for staff approval or disapproval of the licensing application. In the actual hearing I fully expect that there will be numerous proposed contentions, some of which will probably be admitted. Once such issues are identified, I would expect that the PASS system for that issue will be completed to the maximum extent possible to prepare for the hearing.

I have identified below, by section number, those records which should be required entries for the PASS system. Please note, I have not included such items as PASS ID numbers, keywords, etc. which may be necessary entries for searching the system, but which probably would not be presented to the Licensing Board in a hearing.

1. Regulatory Requirement Number
2. Regulatory Text Citations
- 3.5 Included Regulatory Text
- 3.6 Excluded Regulatory Text
- 3.7 Related Regulatory Text
- 3.9 References for Comments/Observations
- 4c. Topic of Related Issue
- 4.f Correlation with NRC Regulatory Requirements
5. Regulatory Elements of Proof
 - 5.2 Parent Regulatory Requirement
 - 5.8 Regulatory Elements of Proof Hierarchy
 - 5.9 Rational for Logical Relationships
 - 5.13 References for Comments/Observations
 - 5.14 Individual Regulatory Elements of Proof

- 6. Technical Review Components
- 6.2 Parent Individual Regulatory Element of Proof
- 6.7 Technical Review Components Set Hierarchy
- 6.8 Rational for Logical Relationships
- 6.12 Individual Technical Review Components

- 8. Evaluation Findings
- 8.b Associated Regulatory Element of Proof
- 8.c Parent Evaluation Finding
- 8.d Topic of Evaluation Finding

- 9. Compliance Demonstration/Evaluation Strategy
- 9.b Associated Regulatory Elements of Proof Set
- 9.c Relationship to Related Issues
- 9.f Demonstration/Evaluation Agency
- 9.g Demonstration/Evaluation Strategy
- 9.h Rational for Strategy
- 9.i References for Relationships, Strategy and Rational

[For purposes of the hearing I am assuming that whatever strategy is selected and recorded under Item 10, Compliance Demonstration/Evaluation Methods, would have been completed and the results recorded elsewhere by the time of a hearing. Therefore, Item 10 would not be a required field. However, if we reach the point of a hearing and some issue has not been resolved or considered, this record would be needed.]

- 11. NRC Compliance Determination Strategy
- 11.2 Associate Regulatory Elements of Proof
- 11.5 Compliance Determination Strategy
- 11.6 Rational for Strategy
- 11.7 References for Strategy and Rational
- 11.8 Compliance Determination Method Hierarchy
- 11.9 Strategies considered, Then Excluded
- 11.10 Rational for Exclusion
- 11.11 References for Rational

- 12 NRC Compliance Determination Methods
- 12.b Associated Individual Regulatory Element of Proof or Technical Review Component
- 12.c Parent Individual NRC Compliance Determination Method

- 12.f thru 12.q inclusive

- 14.g Uncertainty Text
- 14.i Rational for Uncertainty Inclusion or Exclusion
- 14.j References for Uncertainty Text and Rational
- 14.k Uncertainty Action Agency
- 14.l Uncertainty Status

- 16.b Parent Potential Composite Uncertainty
- 16.e Individual Uncertainty Component Texts
- 16.f Rational for Uncertainty Components
- 16.g References for Text and Rational

- 18.2 Parent Potential Composite Uncertainty
- 18.6 Alternative Uncertainty Reduction Method Analyses
- 18.7 thru 18.13 inclusive

- 19.c Parent Potential Composite Uncertainty
- 19.f thru 19.r inclusive

- 20.g thru 20.o inclusive

- 23.9 Recommended Individual NRC Program
- 23.10 Rationale for Attributes Analysis and Recommendation
- 23.11 References for Attributes Analysis, Recommendation, and Rational

All of section 24, Integrated Overall NRC Programs, with the exception of ID numbers and similar information, would be necessary to describe the basis for NRC acceptance or rejection of the License Application.

Assuming all open items have been closed, there should be nothing in item 26 which would be necessary in an uncontested hearing. There will in all probability be intervenors in the licensing proceedings. Item 26 would be important in a contested proceeding and, therefore, should be a required record for purposes of developing the PASS system.

Please note that, because there was some urgency in providing input to the Center so that it could begin entering data on the PASS system, I have not had the above comments circulated throughout OGC and OGC management for concurrence. These comments are my personal views based on my experience in NRC licensing proceedings.