

TOPLTR/1/31/90

JAN 31 1990

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MEMORANDUM FOR: Mary Mace, ADM/CAB

THRU: Shirley Fortuna, PMDA

FROM: Philip Altomare, HLEN/DHLWM

SUBJECT: FINAL TECHNICAL OPERATING PROCEDURE (TOP) 001-02

As a test of the revised Technical Operating Procedure (TOP) 001-02 for development and preparation of information for the Program Architecture Support System, the CNWRA provided completed input forms and Synopsis of information for two worked Regulatory Requirement Topic examples - Erosion and Substantially Complete Containment (Allen Whiting letter to Phil Altomare of November 2, 1989). This was considered a "baselining" of the Program Architecture and a number of discussions and meetings on the subject matter have been held since the receipt of these example cases. The basic process and modifications for database content, as presented in the TOP-001-02 and Attachment A, are acceptable with incorporation of the changes noted in the attachment and should now be formalized in a controlled procedure. Noting, however, that it has been the conclusion of both the NRC and the CNWRA, that further experience should be gained with the intent to streamline the process and the procedures and to establish resource efficient operability and maintainability of the Program Architecture Support System.

B/

Philip Altomare
 WSE&I Program Elements Manger

Enclosure:
 As stated

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Philip Altomare
 WSE&I Program Elements Manager ^A

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ENCLOSURE

NRC COMMENTS ON TECHNICAL OPERATING PROCEDURE (TOP) 001-02

GENERAL COMMENT

The Technical Operating Procedure (TOP) 001-02 and Attachment A are very thorough and provide detailed explanation for the preparation of input for the Program Architecture Support System (PASS). Unfortunately, in obtaining completeness, the resulting quantity of information has had a negative effect on the reviewers in that it leaves a perception of complexity and detail that may be difficult to implement. Although this may be a false impression, possible problems in following or implementing the TOP should be carefully observed in the coming months and simplification of the process and/or instructions proposed, as appropriate. Also, the operability and maintainability of the PASS is very important, particularly as regards minimizing resources required for information collection, input preparation, and update. In general, information collection should be part of the normal work activities. Also, the TOP should state that DOE, State and others program and technical information is only for reference purposes. Instructions should be given to not expend special effort collecting DOE program or technical information for the Program Architecture, particularly in view of the changing DOE program, but to concentrate upon preparation of NRC technical and program information for input to the Program Architecture. The PASS should not be perceived as a means to record and track all DOE activities.

It is requested that the implementation of the TOP 001-02 procedures continue to be monitored with the intent of further streamlining the process and procedures and developing resource efficient operability and maintainability.

SPECIFIC COMMENTSTechnical Operation Procedure

Page 2, first paragraph under 2.2, first sentence beginning with "The PASS ___": change the sentence to read as follows, "The PASS is a management tool for use in recording and monitoring the extensive information and activities that comprise the NRC HLW repository licensing program."

Attachment A

1. Page A5: request that we do not introduce a new acronym, NWMS.
2. Page A9: recommend that site characterization include all site investigations prior to Construction Authorization (including surface exploration) rather than just those between Exploratory Shaft Construction and Construction Authorization.

3. Page 24, Related Issues: 1) it should be clarified that DOE Issues are intended to be the DOE Issue Hierarchy; 2) "State" issues should be changed to "State and others" issues and it should be clear these issues are for information purposes not NRC action. (If NRC adopts the issues of others, they are included as open items or uncertainties and then subject to NRC action.)
4. Page A30, Section 5.6, second sentence: "methods and models" should not be indicated to be included in the Format and Content Guide.
5. Page A66, item 10.1: the General Guidelines and Criteria should be moved to the NRC Compliance Determination Methods.
6. Page A77, Compliance Determination Strategy: the Erosion and SCC Regulatory Requirement, examples each used different approaches to describing the strategy. The record description should be modified to describe a consistent approach that can assist in establishing the level of detail for the regulatory requirement and will be consistent with the NRC License Application Review Strategy.
7. Page A78, first paragraph: recommendations should be submitted to the WSE&I Program Element Manager (PEM) and cognizant technical PEM for review and concurrence or redirection. The WSE&I PEM has coordination responsibility and the cognizant technical PEM has responsibility for the specific technical area. The HLWM Technical Sponsor has overall responsibility for HLWM technical direction.
8. Page A99, second paragraph, item 2: delete this item. An uncertainty on "how to reduce a previous uncertainty" is still the same uncertainty.
9. Page A119, Uncertainty Component: It is not clear that this set of records continue to serve a useful purpose. I suggest that this be considered for removal from the database.
10. Page A129 Composite Uncertainty Reduction Methods Analysis and Page A161, Composite Rank Ordering: Consider treating attribute ranking as off-line activities (see Ted Romine letter to Phil Altomare of 8/22/89).
11. Page A144, item 19f: "Other" should be included under the uncertainty reduction method types. It is not clear that a complete set is given.
12. Page A173, second paragraph, second sentence: delete "for recommendation to the NRC" and replace with "in consultation with NRC."

13. Page A193, Recommended NRC Overall Research Program Plan, Section 24.1.4: the following should be included:
- (a) A clear simple statement of the research need,
 - (b) Technical reason the research is needed,
 - (c) Regulatory reason the research is needed,
 - (d) Reference to NRC programs that will use the research results,
 - (e) Associated NRC research and Technical Assistance, and
 - (f) Associated DOE research or investigations
14. Page A201, Open Items, first paragraph: delete "DOE compliance demonstration methods." NRC will not track uncertainties related to DOE compliance demonstration methods in the PASS as open items. If it is of sufficient concern to NRC it would become an NRC uncertainty to be tracked as an open item. Note, the open item described here is that related to the Program Architecture. At some future time, the open items as defined in the NRC Site Characterization Analysis are to be included, or accessible, from the PASS.

Technical Content of Erosion and SCC Example Regulatory Requirement Topics

The example Regulatory Requirement Topics served to demonstrate the Program Architecture process and application of the PASS database content description, i.e., they served to "Baseline" the Program Architecture. There is still a need to refine and update the technical content of the example cases. Also, this exercise indicated a need for a standardized hardcopy report for Regulatory Requirement Topics in addition to access to the computer database. Accordingly, consideration should be given to preparing a standard report for Erosion and Substantially Complete Containment to be used as a guide for future PASS data preparation.