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JUN 16 1988

Mr. John E. Latz, President  
Center for Nuclear Waste  
Regulatory Analyses  
P.O. Drawer 28510  
6220 Culebra Road  
San Antonio, TX 78284

SUBJECT: TECHNICAL DIRECTION AND PROPOSED PROGRAM ARCHITECTURE  
ACCELERATION

Dear Mr. Latz:

Technical Direction SE88-1

In response to your letter of June 2, 1988, enclosed please find the Logic Diagram for Program Architecture Terminology, dated June 10, 1988 and the associated Definitions. The diagram and definitions are essentially the same as those previously telexed to you and discussed in our conference call on June 10, 1988. As discussed in our telephone conversation, the definitions have been constructed so as to convey the concept of each term and its interrelationships with the other terms, yet provide the Center the flexibility to elaborate on the definitions so as to serve the needs of the Center in development of the Program Architecture.

As we discussed, the "Regulatory Requirements" and the "Elements of Proof" are the mirror image on the staff side of the hearing process as the "Conclusions of Law" and the "Findings of Fact" are, respectively, on the Licensing Board side. I understand that you will now amplify these definitions and share with us your changes. This resolves the pacing item for approval of definitions cited in your June 13th letter.

Proposed Acceleration of Program Architecture Development

In response to your June 13, 1988 letter on the "proposed approach" to advance the development of the Program Architecture, and as discussed in our June 10th telephone conversation, I committed to provide a statement of the requirement that the deliverable desired by December 21, 1988 should address. That statement is enclosed. I understand that the process chart enclosed in your June 13th letter will be modified to include a block reflecting early resolution of the conceptual requirements for the deliverable, and that the deliverable will contain the information in block 17; and, that the briefing in block 15 will contain the block 17 information. We also understand that we can anticipate an early review of the proposed revisions to the Program Architecture (block 6). I understand the proposed modified process would incorporate "lessons learned" from our experience to date, as well as those

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proposed modifications to time-phase the development of the Program Architecture so as to produce an analysis of those sections of the principal statutes and regulations pertaining to "siting" by December 21, 1988.

Mary Mace and I anticipate meeting with you at the Center the week of June 20th to negotiate your proposal to advance the development of the Program Architecture, including impacts on currently established funding levels, costs, and milestones. It is our desire to work out the final specific revisions during the week of the 20th, grant you the NRC Contracting Officer's oral authority to proceed, and to bring back your official final proposal so that it can be incorporated by a modification to the contract while you are in Washington for the management meeting the following week.

Sincerely,

~~Original Signed By~~

Joseph O. Bunting, Jr., Chief  
High-Level Systems Engineering and  
Evaluation Branch  
NRC/CNWRA Program Manager

Enclosures:  
As Stated

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DEFINITIONS FOR  
PROGRAM ARCHITECTURE TERMINOLOGY

REGULATORY REQUIREMENT

A statement of a requirement pertaining to the high-level waste regulatory system, as quoted from the statute, regulation, or other source which has the force of law.

ELEMENTS OF PROOF

What must be proven to support a conclusion that the REGULATORY REQUIREMENT has been met. This may, or may not, be included in the requirement itself. If not, they must be postulated.

This would include those conditions, specifications, criteria, or procedures which will be the standard by which specific evidence will be compared to evaluate the degree to which the REGULATORY REQUIREMENT has been met.

[CNWRA may amplify, as necessary]

COMPLIANCE DETERMINATION METHOD

How the ELEMENTS OF PROOF can or will be shown to have been met.

Includes those investigative or evaluative procedures, techniques, tests, methods, or any other modes of inquiry, or any combination thereof, that will be acceptable, within the context of NRC's regulatory program, to address the ELEMENTS OF PROOF identified as necessary to demonstrate compliance with a REGULATORY REQUIREMENT. This includes but is not limited to methodologies, models, codes, consensus, certification audits of records, etc.

[CNWRA may amplify, as necessary]

INFORMATION REQUIREMENTS

Information required to execute a COMPLIANCE DETERMINATION METHOD.

This includes but is not limited to facts, test data, plans, analyses, or records.

[CNWRA may amplify, as necessary]

### REGULATORY UNCERTAINTY

Lack of certitude as to what is meant by the REGULATORY REQUIREMENT or with its ELEMENTS OF PROOF, or the adequacy, completeness, and/or necessity of the requirement itself.

REGULATORY UNCERTAINTY may stem from lack of clarity in the quoted statement, the omission of an essential requirement from the regulation, and/or the inclusion of requirements in the regulation that do not contribute to or detract from the regulatory program.

[CNWRA may amplify, as necessary]

### TECHNICAL UNCERTAINTY

Lack of certitude as to how to demonstrate compliance and/or obtain the requisite information (e.g. COMPLIANCE DETERMINATION METHOD or INFORMATION REQUIREMENTS, respectively).

[CNWRA may amplify, as necessary]

### INSTITUTIONAL UNCERTAINTY

The lack of certitude regarding the roles, missions, actions, and schedules of agencies with REGULATORY REQUIREMENTS that effect the high-level waste regulatory program, their impacts, or their integration with NRC's regulatory program.

[CNWRA may amplify, as necessary]

### UNCERTAINTY QUESTION

A component of an uncertainty -- An expression of inquiry that calls for a reply.

To resolve a specific TECHNICAL, REGULATORY, or INSTITUTIONAL UNCERTAINTY, one or more questions will arise that require information to obtain an answer or make a reply. The resolution of uncertainty is dependent upon the answer(s) to the question(s) which, in turn, is dependent on the specific information.

[CNWRA may amplify, as necessary]

OPEN ITEMS

Those REGULATORY, TECHNICAL, or INSTITUTIONAL UNCERTAINTIES, COMPLIANCE DETERMINATION METHODS, INFORMATION REQUIREMENTS, UNCERTAINTY QUESTIONS, and decisions, both "proactive" and "reactive," that have been approved by the Program Architecture Configuration Authority for inclusion in the Open Item Tracking Module of the Program Architecture Support System.

[CNWRA may amplify, as necessary]

EVALUATION FINDING

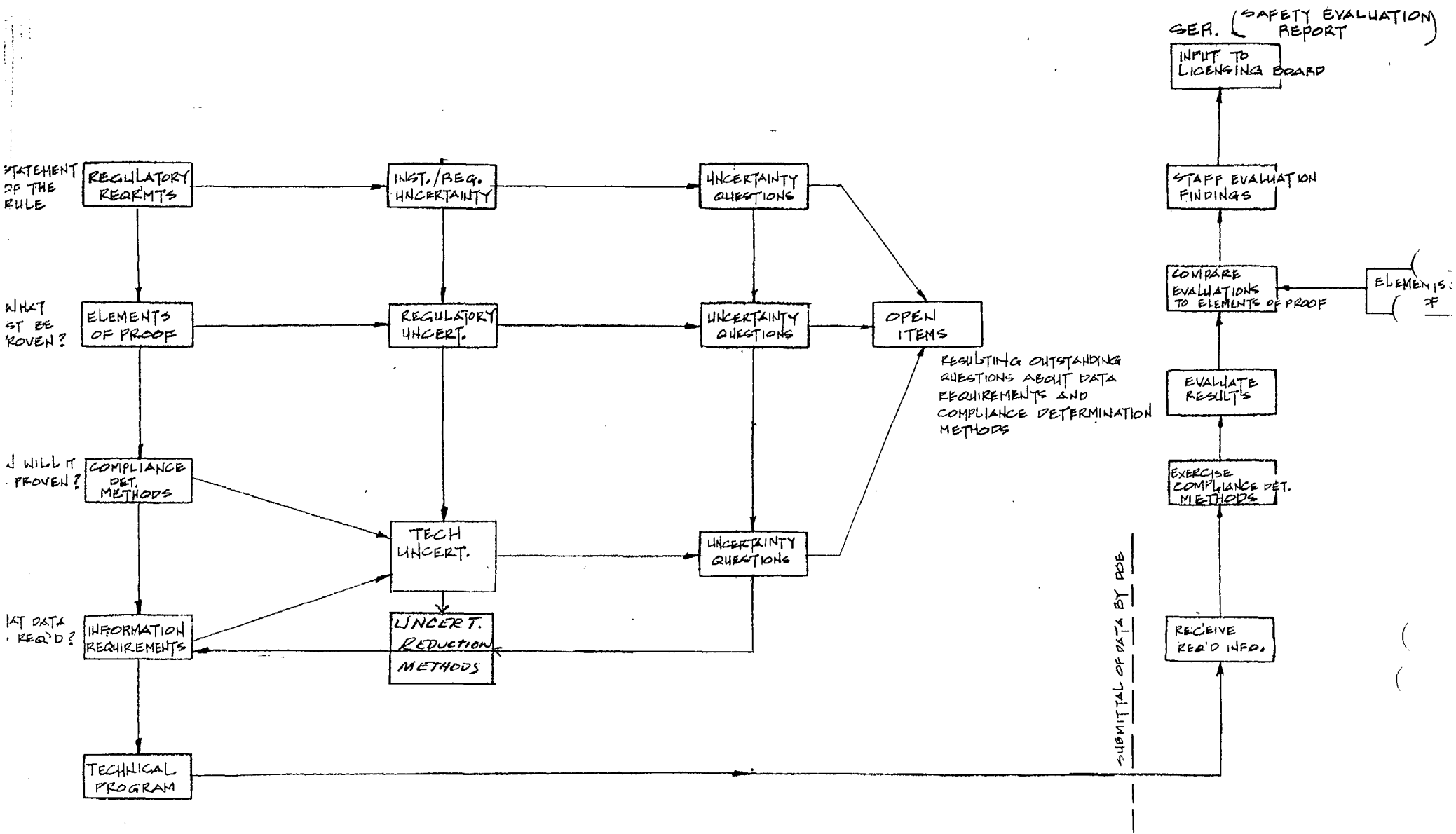
Staff judgment which reflects the merits of the Applicant's information to address the ELEMENTS OF PROOF, and thus, the REGULATORY REQUIREMENT. EVALUATION FINDINGS are included in the Safety Evaluation Report prepared by the staff and submitted to the Licensing Board.

[CNWRA may amplify, as necessary]

UNCERTAINTY REDUCTION METHOD

How the TECHNICAL, REGULATORY, or INSTITUTIONAL UNCERTAINTY will be reduced.

[CNWRA may amplify, as necessary]



LOGIC DIAGRAM FOR  
PROGRAM ARCHITECTURE TERMINOLOGY

JUNE 10, 1988

NOTE: THERE IS POTENTIAL FOR UNCERTAINTIES TO BE DERIVED AT ANY BLOCK IN THE PROCESS. THOSE UNCERTAINTIES MAY OR MAY NOT IMPACT THE TECHNICAL PROGRAM.

CONCEPTUAL REQUIREMENTS  
FOR THE  
PROPOSED DECEMBER 21, 1988  
DELIVERABLE

PURPOSE

The thrust of the proposed acceleration of the program architecture development is to time-phase its development so as to produce, to the extent practical, interim products that assist the NRC management and staff in meeting the programmatic production schedule. To that end, it is desired that the development focus first on those regulatory requirements that pertain to siting. The desired outcome is to produce 1) an analysis and evaluation of those regulatory, institutional and technical uncertainties pertaining to siting, identifying those recommended for resolution by rulemaking, and their relative priority, together with supporting rationale; and 2) an analysis and evaluation of the regulatory requirements and their relative importance to siting, that could be an aid to identifying those aspects of the Site Characterization Plan that should have priority consideration in the NRC staff review. It is understood that certain risks are associated with this approach in that analysis, recommendations and decisions will be made before the systems engineering analysis is completed. NRC recognizes and accepts this risk. Therefore, the deliverable will be a draft only.

SPECIFIC CONCEPTS FOR INCLUSION IN THE DELIVERABLE

NRC suggests that the discussion of requirements for the proposed 12/21/88 milestone be undertaken in conjunction with the requirements for the September 1988 milestone.

September 1988 Milestone

1. Take at least one regulatory requirement through the complete 24 process blocks as a "proof of system".
2. Complete PASS organizational structure - fields defined and capability to generate reports.
3. All data that has been reviewed by PARC loaded in the PASS.
4. NRC access to PASS.

December 1988 Milestone

1. Site constrained regulations identified.
2. Site constrained regulatory requirements identified, analyzed, and prioritized.
3. Site constrained elements of proof identified, analyzed, evaluated, and prioritized.
4. Site constrained regulatory and institutional uncertainties identified, analyzed, evaluated, and prioritized.
5. Regulatory and institutional uncertainty reduction methods postulated, analyzed, and evaluated.
6. Results of previous steps loaded in PASS.
7. Recommendations for rulemaking, priorities, and supporting rationale.
8. Recommendations for focus of staff review of the Site Characterization plan with supporting rationale.
9. Site constrained technical uncertainties and uncertainty reduction methods developed to the extent practical.