

JUL 11 1988

Mr. John Latz, President
Center for Nuclear Waste
Regulatory Analysis
6620 Culebra Road
San Antonio, TX 78284

SUBJECT: TOP-001-01 (JULY 1, 1988 LETTER FROM ALLAN WHITING TO PHILIP
ALDOMARE)

Dear Mr. Latz:

Section 4.2 has been the subject of several telephone discussions between the Center and NRC staffs over the last week, culminating in our telephone discussion today. As we have discussed, it is my understanding that the Center desires to preserve the "Required Finding" field of information in the Program Architecture data base at least for the time being. On the other hand, the NRC staff believes that essentially the same information is already in the data base under the "Regulatory Requirement" field. Further, the NRC staff strongly objects to characterizing the current information in the "Required Finding" field as "Elements of Proof", which would be the result of changing the title of the field as the TOP proposes.

If it is desired by the Center to preserve the information and perform the crosscheck outlined in Section 4.2, we have no objections. However, we do object to changing the title to "Elements of Proof", since the input to this field was not performed with the intent of inputting data that constituted "Elements of Proof". It is suggested that the procedure as outlined in the TOP could still be performed essentially as stated, but that the wording of the procedure would be modified to eliminate reference to "Elements of Proof".

Since this is a validation exercise, the "Elements of Proof" field should be left open until the first instance of a conscious attempt to identify them, which the TOP indicates will be the subject of a later technical operating procedure.

151

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

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