

SEP 01 1988

CNWRA880038/D6-R6

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Mr. Wesley C. Patrick, Technical Director
Center for Nuclear Waste Regulatory Analyses
Post Office Drawer 28510
6220 Culebra Road
San Antonio, Texas 78284

SUBJECT: CONCURRENCE ON FINAL SPECIFICATION/ACCEPTANCE CRITERIA FOR WSE&I
MAJOR MILESTONES R7, I7, R8 AND R9 (MILESTONES D6 AND R6)

Dear Mr. Patrick:

Based on our review of the subject document (dated August 12, 1988) regarding acceleration of the Program Architecture (and referred to as the "December 21, 1988 deliverable"), we find it acceptable. In an earlier review of this specification (dated July 21, 1988), a number of comments and suggestions were raised for your consideration. These comments, which Brian Thomas and myself discussed with you and your staff, are enclosed for reference.

However, due to the importance and high visibility of the milestone products, it is requested that my staff and I be consulted on the selection and development of the "proof of system" example and the outline and preparation of the briefings and report for milestones R8 and R9.

Please feel free to contact me if I may be of further assistance to you in this matter.

Sincerely,

~~Original Signed by~~

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

Enclosure: As stated

cc: Mary Mace, DC

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COMMENTS ON PRELIMINARY SPECIFICATIONS/ACCEPTANCE CRITERIA
FOR WSE&I MAJOR MILESTONES R7, R8 and R9.

GENERAL COMMENTS:

The Center proposes to divide the specification into three parts -- A, B, and C. Review of the requirements for each part indicates that there will be a mix of Center Operations Plan data and with data from NRC's HLW program (i.e., a schedule of activities associated with the NWSA, as amended) in order to demonstrate the six basic components of PASS.

We suggest that Part A ("proof of system") for PASS does not comprise a major portion of the Center's demonstration of the December deliverable. Many of the NRC staff are now familiar with PASS and re-visiting it may just divert attention from the objective of the deliverable.

Specific Comments:

1.0 Scope -- No comment.

2.0 References -- No comment.

3.0 Requirements

3.1 Background -- We suggest that process blocks #11 and #12 of Figure 1 reflect the continuing efforts by the Center starting prior to efforts to be undertaken in process block #8 in order to effect inputs or changes to integration efforts planned for in block #9.

In addition, activities for process block #6 will precede activities in block #3 and this is not clearly indicated by the process diagram.

3.2 Definition of the Program Architecture -- No comment.

3.3 Requirements -- Part A, item 3, pages 6-7; the second paragraph states that a schedule will be presented in the format described. It is unclear what elements and activities will be displayed, in the context of time, for the example to be selected that will address either site-related or facility related uncertainties.

We suggest that the example should focus on site-related regulations, regulatory requirements, and elements of proof. Any other pertinent facility-related items should be noted as well.

Part A, item #4 -- For the example to be selected, we suggest that the Center present a detailed breakdown of the levels-of-effort required to perform the work along with a proposed budget. This breakdown should be at both the task and subtask levels.

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Part B, item #2 -- We suggest that the Center do not process 10 CFR 50 Appendix B for the December deliverable. Instead, move those regulations from category #2 (10 CFR 72 and 10 CFR 100 Appendix A) into second tier for processing. To save more time, omit 10 CFR 960 as well. A review of Appendix B of Part 50 at this time will not aid us in meeting the two principal objectives of this exercise: a) the identification of potential rulemakings, and b) the identification and prioritization of uncertainties for use by the staff in their review of the SCP.

4.0 Characteristics -- No Comment.

5.0 Documentation of Requirements

5.2 Letter Report -- NRC would like to receive a hardcopy report of the example including the data and a schedule of the activities associated with reduction of an uncertainty as defined on page 6, Part A, item #3. NRC would also like to receive draft copies of Part B -- Intermediate Milestone I7 (WSEI Major Milestone 12 and the results of processing the first subset of regulations) well in advance of November 23, 1988.

6.0 Personnel and Training Requirements -- We suggest that those professionals targeted for training in use of PASS also include NRC staff.

7.0 Quality Assurance -- No comment.